EXHIBIT 4

SECTION P

Logistec
Everglades LLC

SAFETY
MANUAL

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INTRODUCTION

This **Emergency Action Plan** has been developed to provide employees with information and response actions to take in the event of emergency situations occurring in the workplace. While it is impossible to identify every possible emergency situation that may be encountered, this plan will cover the most likely scenarios, and this information can be adapted to most other situations. It should be understood that emergency situations are dynamic, and may change suddenly in both scope and nature.

Every situation will require the same initial approach, and then depending on the nature of the incident, incident specific actions will be taken according to the plan. Every incident will require consideration of the following:

INCIDENT SIZE-UP: A determination must be made as to the nature of the incident, the extent of the incident, and what resources are required to adequately address the incident. Specifically, it must be determined if the incident involves INJURY, PROPERTY DAMAGE, FIRE, or SPILL or CHEMICAL RELEASE. Each one of these types of incidents will involve a specific protocol for handling the incident.

EVACUATION REQUIRED? : Supervisory staff will determine whether evacuation is necessary. In the event that evacuation of the work area is necessary, employees will be given the evacuation signal/alarm, and will report to the primary or secondary evacuation assembly area. The alarm will consist of a broadcast over the radio to evacuate to the assembly area, and in the event that a ship is being discharged, repeated blasts from an air-horn or siren will signal evacuation if radios are not available. The pre-planned evacuation route will be followed at each location in the facility. Once at the assembly area, supervisors will account for all employees that had been working prior to the evacuation. The primary evacuation assembly site is the truck staging area, at the pre-vessel assemble point. In the event that this primary assembly area falls within the evacuation area, employees will be directed to a secondary evacuation assembly area. Employees working inside the office building shall evacuate the building immediately on hearing the internal alarm and assemble parking lot. In the event that that building has been determined to be within the evacuation zone employees shall report to the secondary assembly area at the security gate. Employees will refer to the Evacuation Routes on the site map to determine the best route to follow to the assembly areas. **Upon hearing the evacuation signal, all employees are to report to the assembly area immediately!**

COMMUNICATIONS:

Reporting Fires or Other Emergencies:

Fires and other emergencies requiring outside resources shall be immediately reported via the 911 emergency activation systems. Supervisors shall be notified via the portable radios. Supervisors have two-way radios, which can communicate with the dispatch desk. During normal business hours, initial notification of an incident will be made through the two-way radio to the dispatcher or foreman. The dispatcher or foreman will then activate the appropriate protocol for the situation. Communication with agencies outside the facility will be through the telephone system. In the event that power is interrupted and the telephone system is not functioning, a cellular telephone will be used to contact the appropriate agencies. In the event that an incident occurs outside of normal working hours, or when the dispatch area is not staffed, contact with outside agencies will be made directly by the supervisor. The supervisor will use land telephones or cell phones, as appropriate. For fires occurring inside buildings with fire alarm systems, employees shall activate the alarm immediately upon discovering the fire.

Alarm systems:

There are three types of alarm systems used in emergency situations at this facility.

1. Two-way radios – yard employees and supervisors have a radio, or work in proximity to an employee who does. This is the primary means of notifying employees of an emergency situation.
2. The main office building is equipped with an internal fire alarm. Upon hearing the activated alarm, all employees are to exit the building following the emergency exiting procedures.
3. Longshore employees working on discharging a vessel and/or not equipped with a radio, will be alerted of an emergency evacuation order through the use of an audible alarm. This alarm will sound as repeated blasts on an air-horn type of device, sounded on the pier.

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DUTIES OF EMPLOYEES: There are no critical facility functions or operations that must be implemented prior to evacuation. All employees are to report immediately to the employee assembly area when an evacuation has been ordered, or when the fire alarm has been activated. Those employees trained in first aid may assist others requiring such assistance, but should not do so if providing such help will place the provider in any danger. In the event of a small fire, controllable with the use of a fire extinguisher, employees trained in the use of fire extinguishers may use them. Employees not trained in the use of fire extinguishers should not attempt to use them. Rescue and fire suppression activities will be performed by outside emergency response personnel only. Supervisors will account for all employees working on the job at the time of the evacuation to determine if any workers are missing. In the event that the main office building or areas of the yard or dock need to be evacuated, workers are to:

1. Stop work immediately;
2. Shut off any motorized or mechanized equipment you are operating;
3. Quickly exit the building or work area using the established escape routes;
4. Supervisors and hatch bosses should conduct a rapid survey of their work area to be sure it has been evacuated.
5. Report immediately to the designated assembly area.
6. Report any injuries or missing co-workers to your supervisor immediately;
7. **Do Not** attempt to re-enter the evacuated building or work area for any reason;
8. Remain at the designated assembly area until given instructions to return to work or to leave the area.

At no time are employees to place themselves in danger during an incident.

PROCEDURES TO ACCOUNT FOR EMPLOYEES:

During an incident that requires an evacuation, employees shall proceed to the designated primary or secondary evacuation assembly area. The following procedures shall be used to account for personnel on site:

Terminal Personnel – The Director of Operations will be responsible to account for all workers assigned to the terminal operations. The absence of any employee, visitor or outside contractor must be reported to the supervisor and emergency personnel immediately.

Longshore Personnel – The Superintendent shall have overall responsibility to account for longshore workers. The Superintendent shall bring the assignment roster to the assembly area to verify the accounting of workers. Each lead man (header) shall account for individuals under their supervision, and report this information to the timekeeper.

Outside Truck Drivers and Contractors – The port security department will keep a log of all non-drivers on site. Outside contractors will sign in with either the security guard or the dispatcher upon entering the facility. In the event of evacuation, the sign in log will be brought to the assembly area for the accounting of personnel.

Refer to the specific Action Plan for the type of emergency encountered. For additional information regarding the EMERGENCY ACTION PLAN, please contact your supervisor, or Bert Suarez / Director of Operations. 1-786-371-6402

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1. Keep immediate work area reasonably free of equipment and materials not in use.
2. Clear immediate work area of debris and other objects not directly associated with the work in progress and which might present a hazard to employees.
3. Maintain clear pedestrian and vehicular aisles and passageways.
4. Eliminate slippery walking and working surfaces in areas used by employees and to the extent possible, the conditions causing the slippery surfaces.
5. Encourage good housekeeping practices by seeing that trash containers are provided at specific locations and emptied when full.
6. Readily maintain a liberal supply of sand or other suitable absorbent materials to use as an aid in eliminating slippery surfaces.
7. Stack cargo and pallets to provide stability against sliding, shifting or collapse.
8. Provide proper and adequate illumination around immediate work areas.
9. Provide and maintain proper and adequate firefighting equipment.
10. Maintain clear and unobstructed access to all firefighting equipment.
11. Open fires and fires in metal drums or similar containers are prohibited.
12. Smoke only in authorized areas. (No smoking on the dock or vessels)
13. Perform repair or reconditioning of damaged cargo packages in an area that will not endanger employees.
14. Assure that floors of railcars and trucks are in visible safe condition prior to commencing loading and unloading.
15. Move with caution or otherwise prevent railcars and truck trailers from moving while employees are working within or near ends of these vehicles.
16. Provide protection from exposure to impact from other moving railcars when employees are working in or on stationary railcars.
17. Before fully opening rail car or truck trailer doors, slightly open doors to ensure that freight inside has not shifted during transit.
18. Stand clear of gondolas and flat cars while cargo is being hoisted or lowered unless there is a safe place to stand in or on the railcars.
19. Adequately support and secure truck trailers and containers on chassis being stuffed or stripped with use of forklifts to prevent landing gear collapse and vehicle movement.
20. Use cargo handling gear and equipment within its rated capacity.
21. When employees are known to have heart disease, epilepsy, defective, uncorrected eyesight or hearing or similar ailments which. May suddenly incapacitate them, they should be assigned tasks other than operating cranes, winches and other power-operated hoisting equipment or vehicles.
22. In the vicinity of each vessel being worked keep a U.S. Coast Guard, approved life ring with at least 90 feet of attached line and ladder giving access to the water readily available.
23. Maintain properly supplied first aid kits and make readily available near each job site.
24. Approved eye protection equipment should be provided to all employees.
25. Employees entering or working in hazardous atmospheres should be provided with and trained in the use of respiratory protective equipment.
26. Employees exposed to nuisance dust or to pneumoconiosis producing or toxic dusts should be provided with and trained in the use of respirators or approved dust masks.
27. Approved protective hard hats will be worn by all employees.
28. Special protective clothing will be worn by employees when circumstances necessitate such clothing.
29. Bridge Plates (car plates, dock plates) must be:
    (a) Strong enough to carry loads imposed on them.
    (b) Secured in position to prevent slipping or shifting.
    (c) Sufficient size to practically fill rail car or truck trailer door openings.

30. Portable ramps must be:
    (a) Strong enough to carry loads imposed on them.
    (b) Provided with sideboards to prevent vehicles from rolling off edge.

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(c) Equipped with approved guard railing if slope is more than 20 degrees horizontal or if employees are exposed to falling more than 4 feet.
(d) Provided with a slip resistant surfaces.

31. Spray painting or sandblasting should not be permitted in the immediate vicinity of cargo handling or other dock operations unless employees are properly protected.
32. Shield electric arc or gas welding operations so as to prevent eye injury to employees working in or near vicinity. Also, ensure that required permits have been obtained.
33. Park private vehicles in authorized areas.

SHIPBOARD SAFETY RULES

In addition to general rules and special duties for precarious work categories, specific safety rules applying to shipboard work sites are recognized as a means of preventing injuries. Some of these are:

1. Maintain good housekeeping in working and walking areas. Remove or render safe with absorbent sand, oil dry, sawdust, salt, covering or other suitable means all slippery conditions caused by oil, grease, hydraulic fluid, cargo spillage, ice, snow or other substance.
2. Use safety ladders that are secure and unobstructed. At least one safe and accessible ladder should be provided for each gang in the hatch.
3. Rig ship's cargo handling gear for safe and efficient operation. Raise or lower booms with the supervisor present.
4. When working cargo over a deck load, provide a safe and adequate walkway for the designated signalman.
5. When an edge of a permanent landing platform is so exposed that there is danger of a person falling, guard the edge with a line, safety net, railing or similar safety device so placed as not to interfere with movement of cargo.
6. When two gangs are working in the same hatch on different levels, provide adequate protection to prevent workers and cargo from falling.
7. Keep work areas where winch drivers stand or sit in good order and see that seats are substantial and well secured.
8. Stow strong backs and hatch covers so as not to interfere with a safe walkway from hand rails to hatch coming or fore and aft, and secured so they cannot be tipped over or dragged into hatches or overboard by cargo or gear. This applies to all decks.
9. Secure stowed or piled cargo in a ship's hold when there is the possibility of collapse on workers below.
10. Use double slings where practical on cargo where in danger of sliding (dunnage, lumber, pipe, etc.).
11. Always use proper gear when slinging pallets.
12. Do not hoist baled cargo by hooks attached to the bands or fastenings unless the straps are of sufficient strength to support the weight of the bale.
13. Lift truck, dozer and loader operators must wear seat belts when equipment is in operation, even while working in the ship's hold. This is an OHSA requirement; non-compliance will result in disciplinary action.
14. Take necessary precautions to prevent falling, sliding, or spreading of cargo that is being raised or lowered by hoisting gear. Cargo should not be lifted or maneuvered over the heads of workers.
15. Protect manholes and other flush deck openings with covers or railings.
16. Handle hazardous materials in accordance with the Department of Transportation, state and local regulations and ensure appropriate handling and placards.
17. Check to make sure hatch cover is open to give more light before any personnel attempts to go down ladder into Hold through manhole.

DUTIES OF EQUIPMENT OPERATORS

The duties of equipment operators are:

1 Test brakes, steering gear and mechanisms for raising, lowering and tilting mast before starting work, and report any defect to the foreman, or other supervisory representative on the job.

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2. Operate lift truck in such a manner as to give an unobstructed view of the direction of travel and drive in reverse when necessary.
3. Be especially cautious and use horns when approaching blind corners or other places where vision is limited.
4. Obey all speed and traffic regulations and other applicable haulage equipment rules.
5. Have the equipment under control at all times so that it can be brought to an emergency stop.
6. Unless equipment is designed to accommodate passengers, employees are not permitted to ride on vehicles except on specific instructions from supervision.
7. Operate vehicle from seat or platform only, and not while standing or walking alongside unless equipment is designed to operate in this manner.
8. Operate vehicle in a safe manner.
9. Safety devices should not be removed or made inoperative.
10. A distance of at least 20 feet shall be maintained between the first two vehicles in line, and behind any vehicle which employees must work.
11. All lines to the chassis braking system should be connected during trucking operations.
12. Loads on lift truck- should not be suspended or swung over any person.
13. No lift trucks should travel with a load of loose material, which exceeds the height of mast.
14. When lift trucks are parked, forks should be tilted forward and be flush with floor and clear of aisles. When moving, lift trucks should be elevated high enough to clear all surfaces.
15. Shut off motor and apply parking breaks when leaving vehicle.
16. Do not drive under suspended loads.
17. Never pull or push loaded or empty rail cars without first checking the switch to insure that it is in the proper location.
18. Never pull or push loaded or empty rail cars over a road crossing without the assistance of a flagman.
19. Do not operate any company vehicle without a seat belt.
21. Insure that the safety basket is properly attached to the fork truck tines before lifting personnel. Do not lift personnel in any other way.
22 Perform pre-operational inspections and equipment checks.

DUTIES OF CRANE & WINCH OPERATORS

The safety duties of crane operators are:

1 Before starting hoisting operations, crane operators will do the following:
   (a) Follow all established "start up" procedures.
   (b) See that the crane is working properly by testing it without a load on the hook.
   (c) Be familiar with all operating procedures of the particular piece of equipment to be operated.
   (d) Report any defects to the foreman or stevedoring manager.
2. Operate the crane only on clear understood signals.
3. At all times operate the crane in a safe manner keeping the load under complete control.
4. When it is necessary to hold loads, insure that they are held over or landed on the deck or dock and not suspended overheads of men working under the hook.
5. Keep both hands free when going up and down ladders. Articles, which are too large to go into pockets or belts, shall be lifted to or lowered from the crane by hand line (except where stairs are provided).
6. If crane power goes off, immediately throw all controllers to "off" position until instructed to turn power on again by authorized person.
7. Pay special attention to the relative position of the blocks to avoid unnecessary tripping of the limit switch.
8. Do not hoist sling loads, which are improperly slung.
9. Adhere to manufactures operating procedures and applicable load ratings.
10. When two cranes are used to hoist a load, the load shall be rigged in a way, which will distribute the load in direct relation to the capacity of each crane. Two crane lifts should be made only under the supervision of a supervisor.
11. Side loading of crane booms is prohibited.
12. See that booms do not strike fixed objects or are struck by swinging loads.
13. Determine the capacity of the crane under the conditions of use and weight of loads to be hoisted, the crane must not be overloaded.

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14. Adhere to all established wind warnings and crane securing procedures-.
15. Accessible areas within the swing radius of the out most part of the body of a revolving crane shall be guarded by suitable means during cargo operations so as to prevent an employee being in a position to be caught between the body of a crane and fixed parts of the vessel or of the crane itself.
16. When leaving the cab, see that all "shut down" procedures are followed including the position of all master controls in the neutral position, the placing of all friction controls in the disengaged position and the locking of all foot brakes.
17. Leave the cab and upper deck clean of all debris, oily rags, oilcans and trash. Restow all tools and equipment in the proper place.
18. Perform pre-operational checks on the equipment as directed.

Use of Electronic Devices while operating equipment

Purpose:

To enhance the safe operation of heavy motorized equipment at company facilities.

Policy:

The use of certain electronic devices while operating forklifts, cranes, and other motorized equipment is prohibited. The prohibited devices include cellular telephones, portable musical devices requiring headphones, (i.e. walkmans, radios, cd players, etc). These prohibited devices shall not be used, worn, or otherwise engaged while operating motorized equipment.

This prohibition does not include devices used in the routine course of work, such as portable two-way radios or radios used for signaling. Vehicle installed radios not requiring the use of headphones are allowable when played at levels which do not interfere with the safe operation of the equipment.

Compliance / Non-Compliance:
All operators of equipment shall comply with this policy. Due to the safety implications of non-compliance, individuals not complying with this policy may be immediately removed as an equipment operator, and shall be subject to the discipline policy.

Vehicle/Forklift Safety

It is the responsibility of the operator to report any defects that my affect the operation of a vehicle. A checklist will be furnished with each vehicle to be completed each day before the vehicle is dispatched. At any time the vehicle does not meet expectations, notify the supervisor immediately.

The Facility will establish a preventive maintenance program for each vehicle. Separate preventive maintenance programs will exist for vehicle. The Maintenance Foreman is responsible for maintaining the PM Program

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The vehicle operator is responsible for:

1. Performing a pre/post vehicle inspection.
2. Safe operation
3. Vehicle cleanliness
4. Reporting of all accidents

COMPANY VEHICLES WILL, AT ALL TIMES, BE OPERATED IN A SAFE MANNER.

OSHA also requires that employers direct vehicle operators to comply with posted traffic controls signs (e.g., posted speed limits) or signals, and written traffic instructions (§1917.44). Other traffic controls that employers can implement include:

- Speed limit signs at appropriate locations;
- Stop lines and lane markings on pavement;
- Rumble strips/surface indentations at intersections and other critical areas to remind drivers of speed;
- Utility vans parked to guard terminal mechanics working in a container yard, traffic cones to alert vehicle operators of the location of employees, and alerts to warn drivers about the work;
- K-rails (Jersey barriers) or other barriers used for directional traffic controls and to separate pedestrians from motor vehicle traffic;
- Sign(s) and barriers to alert drivers of construction projects and other changes to traffic routes;
- Traffic control information for OTR trucks entering terminals, including terminal maps and driving rules; and
- Supervisors or traffic guards to direct traffic in the terminal at busy intersections and work areas.

Traffic control - Install traffic controls and remind drivers to operate at safe speeds and protect pedestrians. Safety Manager will ensure the following traffic controls are in place and/or available for use as needed marine terminals:

- Stop signs shall be posted at main entrances and exits of structures where visibility is impaired;
- Stop signs shall be posted at blind intersections, unless direct traffic control or warning mirror systems or other systems of equivalent safety are provided; Vehicular routes, parking areas, and traffic rules shall be established, identified, and used; and
- Signs indicating pedestrian traffic shall be clearly posted at vehicular check-in and check-out lines and similar locations where employees may be working (§1917.44).

Vehicle selection and maintenance - Selecting safe vehicles and maintaining them in proper condition are critical components to effectively minimize traffic accidents in marine terminals. Employers should ensure that vehicle safety equipment such as horns, backup alarms, seatbelts, brakes, mirrors, and warning devices are maintained in good repair and utilized properly by the operator. Employers should also ensure that vehicle operators follow the manufacturer's design and operation parameters. Employers must also ensure that the equipment is not modified without either the manufacturer's prior written approval or the written approval of a professional engineer experienced with the equipment who has consulted with the manufacturer, if available.

OSHA standards for PITs used for material or equipment handling at a marine terminal are contained in 1917.43 and 1910.178(l). The rules apply to every type of PIT used for material or equipment handling within a marine terminal (e.g., straddle carriers, hustlers, top loaders, and container reach-stackers)[3]. The following are some of the provisions in §1917.43 that pertain to safe operation of PITs:

- Modifications that might affect the vehicle's capacity or safety shall not be performed without either the manufacturer's prior written approval or the written approval of a professional engineer experienced with the equipment who has consulted with the manufacturer, if available;
- Unauthorized personnel shall not ride on PITs. A safe place to ride shall be provided when riding is authorized;

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- When a PIT is left unattended, load-engaging means shall be fully lowered; controls neutralized; and brakes set. Unless the PIT is in view and within 25 feet (7.62 m) of the operator, power shall be shut off. Wheels shall be blocked or curbed if the PIT is on an incline;
- PITs shall not be operated inside damaged highway vehicles or railcars if the vehicle or railcar could affect operational safety;
- PITs shall be marked with their rated capacities, which shall be visible to the operator;
- Only stable and safely arranged loads that are within the rated capacity of the PIT shall be handled;
- The employer shall direct PIT drivers to ascend and descend grades slowly;
- The employer shall direct PIT drivers to slow down and sound the horn at cross-aisles and other locations where visibility is obstructed;
- If the load obstructs the forward view, the employer shall direct PIT drivers to travel with the load trailing;
- Steering knobs shall not be used unless the PIT is equipped with power steering;
- When cargo is being towed on trucks or similar equipment, a safe means shall be provided to protect the PIT driver from sliding loads;
- Only designated persons shall perform maintenance and repair;
- Replacement parts whose function might affect operational safety shall be equivalent in strength and performance capability to the original parts they replace;
- Braking systems or other mechanisms used for braking shall be in safe and operable condition; and
- PITs shall be maintained in safe working order. Safety devices shall not be removed or made inoperative except as otherwise provided in §1917.43. PITs with a fuel system leak or any other safety defect shall be taken out of service until properly repaired.

Section 1910.178(l) establishes training requirements for PIT operators, including those working at marine terminals. The type of training required will be based on the type and amount of the operator's prior training; the operator's knowledge and demonstrated ability to operate PITs safely; the types of PITs the operator will be using at the terminal; and the conditions present in the workplace. For example, if an operator has received prior training in the topics below and been evaluated as competent to operate a PIT safely in the working conditions to be encountered, then initial training need not be repeated.
Where initial training is necessary, it must cover the following truck and work-related topics that are applicable to safe operation of the PIT in the terminal:

PIT-related topics:

- Operating instructions, warnings, precautions, and limitations, including those listed in the operator's manual;
- Differences between PITs and automobiles;
- PIT controls and instrumentation;
- Engine or motor operation;
- Steering and maneuvering;
- Visibility;
- Fork and attachment operation and limitations;
- Vehicle capacity and stability;
- Vehicle inspection and maintenance the operator will perform; and
- Refueling or recharging.

FORK LIFT OPERATING RULES & PROCEDURES

The company has adopted the OSHA rules and regulations on the following pages as the basic minimum guidelines for the safe operation of forklifts. The key to the success of our program is the use of qualified and competent drivers.

The company will ensure that all operators are **"qualified"** or trained prior to allowing anyone to operate a forklift. Each driver will be reviewed at least annually for his or her ability to perform using the forklift safely. This will be done by utilizing a planned program review by qualified oversight personnel within the company or to use the services of an outside agency to **"Certify"** our forklift operators.

- Both drivers and employees who work around these vehicles are required to follow these operating rules and procedures:
- Only authorized drivers who are trained in safe operation may operate forklifts.
- Do not ride on the forks of any lift truck/forklift.
- Passengers are not allowed on any forklift.
- Do not place any part of your body outside the running lines of a forklift, or between the mast uprights or other parts of the truck where shearing or crushing hazards exist.
- Do not stand, pass, or work under the empty or loaded elevated portion of any industrial truck, unless it has been blocked effectively to prevent it from falling.
- Check the vehicle at least once each shift to ensure that the following are operating properly:

TIRES	LIGHTS	FUEL SYSTEM	BATTERY	STEERING	MECHANISM
CONTROLLER	HORN	LIFT SYSTEM	BRAKES	BACK-UP ALARM	

- Any vehicle in need of repair should not be used until repairs have been made.
- Look in the direction of travel, and don't move the vehicle until you see that your path is clear of people and objects.
- Do not drive toward anyone standing in front of a bench or other structure; if the vehicle fails mechanically, or you misjudge distance, that person may be trapped between your truck and the structure.
- Do not exceed the authorized safe speed.
- Do not pass other trucks traveling in the same direction at intersections, blind spots, or other dangerous locations.
- Maintain a safe distance from other vehicles. For trucks traveling in the same direction, a safe distance would be 3 truck lengths or a 3 second time lapse passing the same point.
- Observe all traffic regulations.
- Slow down and sound the horn at cross aisles and other locations where vision is obstructed.
- Carry the forks as low as possible consistent with safe operation.
- Cross over railroad tracks diagonally wherever possible. Do not park closer than eight feet six inches from the centerline of the railroad tracks.
- Do not load industrial trucks in excess of their rated capacity.
- Do not move a loaded vehicle until the load is secure.
- If the load obstructs forward view, drive backwards.
- Ascend or descend a grade slowly with the load upgrade.
- Do not tilt the load with the mast extended past the center of gravity.
- Do not drive a vehicle into any elevator unless you are specifically authorized to do so.
- Before entering the elevator, make sure that your vehicle and load will not exceed the rated capacity of the elevator. Once your vehicle is on the elevator, shut the power off, and set the brakes.
- Before you drive your vehicle on a floor, platform, or into rail cars, trucks, or trailers be certain the structure will support the loaded vehicle.
- When you leave the fork lift bring the mast to the vertical position, place the forks on the floor, shut the power off and curb or block the wheels (if parked on an incline).

USING A FORKLIFT TRUCK TO ELEVATE EMPLOYEES

THE PLATFORM

- When a forklift is used to elevate employees, the lift must be equipped with a **"safe" work platform.**

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- The platform must be at least 24" x 24" square and it must be large enough to accommodate the employee and the material to be elevated.
- The platform must be securely attached to the forks and/or must be equipped with a standard guardrail with mid-rails on all open sides.
- The platform must have a slip-resistant floor and cannot have spaces or holes between the floor sections larger than 1 inch in size.
- The side of the platform resting against the forklift mast must be equipped with a substantial covering so that an employee cannot reach into the operation of the lifting mechanism. This covering or guard must extend from the floor of the platform to a minimum of 7 feet above the workers feet.

THE FORKLIFT

- The forklift must be the proper size and capacity for the intended job.
- The forklift must be equipped with overhead protection whenever it is operated under conditions that expose the operator to danger from falling objects.

THE OPERATOR

- The operator of the forklift must be at the control position of the lift while employees are on the elevated platform.

OPERATING RULES WHEN ELEVATING EMPLOYEES ON FORK LIFTS

- Use a securely attached "safety platform".
- Make sure the lifting mechanism is operating smoothly.
- Place the mast vertical and never tilt it forward or rearward when it is elevated.
- Place the gears in neutral and set the parking brake.
- Lift and lower the work platform smoothly and with caution.
- Watch for overhead obstructions.
- Keep hands and feet clear of controls other than those controls being used
- Never travel with personnel on the work platform other than to make mirror adjustments for final positioning of the platform.
- Surface conditions where the PIT will be operated;
- Load composition, stability, manipulation, stacking, and un-stacking;
- Pedestrian traffic in areas where the PIT will be operated;
- Narrow aisles and other restricted places where the PIT will be operated;
- Hazardous (classified) conditions and closed environments where the PIT will be operated;
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation; and ramps and other sloped surfaces that could affect the vehicle's stability.

Training must be a combination of formal instruction (e.g., lecture/discussion, interactive computer learning, videotape, written material), practical training (e.g., demonstrations performed by trainer, training exercises by trainee), and evaluation of the operator's performance in the workplace.

Operators must also receive refresher training when they have been observed operating the vehicle in an unsafe manner, been involved in an accident or near-miss incident, received an evaluation of unsafe operation, are assigned to operate a different type of PIT, or when changes in workplace conditions could affect safe operation. In addition, every operator's performance must be evaluated at least once every three years.

Walking safely in marine terminals - The employer should inform anyone walking and/or working in marine terminals about traffic hazards and how to protect themselves from injury. Employers should point out the following to pedestrians in marine terminals:

- The OSHA requirement that designated walkways must be provided and used. Marked or designated areas shall be set aside within a container or roll-on/roll-off terminal for passage of employees to and from active cargo transfer points, except where the employer provides transportation to and from these points (§1917.71(d)(1));
- Pedestrians should be aware that drivers cannot see them when they are in a vehicle's "blind spot." Pedestrians should avoid these blind spots whenever possible. When approaching or walking near vehicles, it is essential that they make eye contact with the operator and be sure that the operator acknowledges them;
- The OSHA requirement that each employee working in the immediate area of container handling equipment or in the terminal's traffic lanes wear a high visibility vest (or equivalent protection) (§1917.71(e));
- Pedestrians should make sure that their movements are predictable (not darting out suddenly from behind or between containers and not suddenly changing directions);
- Avoid placing items on rolling or moving equipment. Loose items can fall off the equipment and strike someone; and
- Be aware of the swing radius on forklifts and other similar vehicles. The rear wheels of forklifts enable these machines to turn sharply and quickly.

VEHICLE MAINTENANCE

In the normal activities of vehicle maintenance, it is essential that adequate safety standards be prescribed and observed by all shop and company personnel. This should help promote efficiency and reduce the possibility of personal injury and property damage.

Oil and grease-soaked rags or other waste should be disposed of in self-closing metal waste cans approved (UL or FM) by SAFETY recognized fire protection laboratories.

MECHANICAL HOIST/LIFTS

- Every mechanical automotive hoist should have a brake that will automatically hold twice the rated load at whatever level it may be when lifting ceases.
- Hydraulic lifts have devices that will hold the load independently of the lifting means at the maximum "up" position.
- Hoists should never be used to lift vehicles that weigh beyond the rate lift's capacity or to lift one end of the vehicle only.
- The condition of lifts should be checked monthly. Leaks should be repaired and oil levels maintained on hydraulic lifts.
- Controls on lifts should require continuous pressure from the operator and at a distance so the operator will not be struck by the falling load if the lift falls.
- No person should stand in front of vehicles being driven onto the lifts and no person should remain in a vehicle being lifted. No bystanders should be allowed near equipment being lifted.
- All lifts should have safety legs which will hold the load if the lift fails.
- Employees must always place these legs properly before working under raised equipment.
- Wearing safety goggles will save the annoyance of workers getting dust and an occasional serious injury from foreign particles in the eye.
- Employees should never put their hands over grease gun nozzles (grease can be forced under the skin if the gun handle is pulled).
- When lubricating springs, stand clear of lubricant spray to avoid inhalation.
- The tops of grease cylinders must be securely screwed or clamped in place to prevent blowing off under pressure.

JACKS

- The rated load should be legibly and permanently marked in a prominent location on the jack by casting, stamping, or other suitable means.

OPERATION AND MAINTENANCE:

- In the absence of a firm foundation, the base of the jack should be blocked. If there is a possibility of slippage of the cap, a block should be placed in between the cap and the load.
- The operator should watch the stop indicator, which should be kept clean, in order to determine the limit of travel. The indicated limit should not be overrun.
- After the load has been raised, it should be cribbed, blocked, or otherwise secured at once.
- Hydraulic jacks exposed to freezing temperatures should be supplied with an adequate antifreeze liquid.

TIRE REPAIRS (MULTI-PIECE AND SINGLE PIECE RIM WHEELS)

All employees will not attempt repairs to any wheels. Tire Repairs, or wheels shall be taken to an outside sources (Tire Dealer).

CONTROLLING MOVING VEHICLES/TRAFFIC

1. Movement of vehicles inside shops, and garages should be regulated by rigidly enforced traffic rules.
2. Vehicles with air brakes should not be moved until sufficient air pressure has been built up.
3. Mirrors should be installed at blind corners.
4. Vehicles should be moved in low gear and at low speed inside shop areas, especially up and down ramps.
5. Employees should stand out of the way of moving vehicles.
6. No vehicle should be backed in a garage without assistance from a signalman.
7. Mechanics should not work under vehicles while lying on "creepers" if there is any danger another vehicle will pass over the area where their legs are sticking out. If necessary, adjacent vehicles should be locked and tagged and/or adjacent spares should be blocked with barricades.
8. Mechanics should follow lockout procedures when working on vehicles to ensure that engines are not started and vehicles are not moved while they are at work.
9. Mechanics should:
   a. Lockout the starting switch;
   b. Place a warning tag on the starting control or steering wheel; and
   c. Block wheels and all moving parts during maintenance.
10. Tilt cabs and engine hoods should be propped up when not in place.
11. To prevent steam burns, all vehicles should be equipped with a safety petcock, which should be opened to bleed steam off before removing radiator caps.

Equipment Qualification Procedures/Policy

1. Due to the degree of training and safety considerations needed for equipment and to comply with OSHA regulations, qualification cards are formulated for operators.

2. The prospective operator must demonstrate knowledge of the machine's safety precautions, preoperational checks, controls and emergency operations. The person will also demonstrate the ability to safely operate the machine, discuss the reporting of damage equipment during initial inspection and during operation.

3. A list of the equipment qualifications are as follows:
   a. Loader operator

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b. Excavator operator
c. Skid steer operator
d. JLG operator
e. Top pick Container lift operator
f. Fork lift operator
g. Sweeper operator
h. Track-mobile operator

4. Qualification Procedures:
   a. Safety Precautions:
      -Identify all general safety precautions related to the safe operation of the unit. -Identify all emergency stop stations.
      -Know and discuss the limitations of the equipment
   b. Basic / General knowledge of machine:
      -Read and understand the operator's manual for the specified equipment
      -Identify all of the major components of the machine.
      -Identify and explain the functions of all controls at all stations.
   c. Operational Tasks:
      With qualified supervision:
      -Perform a pre and post operational checks and
      -Prove the ability to safely operate the equipment.
   d. Final qualification requirements:
      -Supervisor will conduct an oral and/or written examination and give a recommendation for qualification.
      -Department manager, final signature
      -Noted/update qualification chart by Supervisor.
      -Supervisor/ HR will ensure logged in individual training record.

Refresher Training Policy

Enclosure 1: Refresher Training Guide and Signature Sheet.

1. Per OSHA regulation 29 CFR 1910.178(l)(4)(i) Refresher training, including an evaluation of the effectiveness of that training, shall be conducted as required by paragraph (l)(4)(ii) to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck(equipment) safely.
2. Refresher training/evaluation in relevant topics shall be provided to the operator when: (one of the following applies)
   a. 1910.178(l)(4)(ii)(A) The operator has been observed to operate the vehicle(equipment) in an unsafe manner;
   b. 910.178(l)(4)(ii)(B) The operator has been involved in an accident or near-miss incident;
   c. 1910.178(l)(4)(ii)(C) The operator has received an evaluation that reveals that the operator is not operating the truck(equipment) safely;

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d. **1910.178(l)(4)(ii)(D)** The operator is assigned to drive a different type of truck(equipment);
e. **1910.178(l)(4)(ii)(E)** A condition in the workplace changes in a manner that could affect safe operation of the truck(equipment).
f. **1910.178(l)(4)(iii)** An evaluation of each powered industrial truck(equipment) operator's performance shall be conducted at least once every three years.

3. **1910.178(l)(5)** ***Avoidance of duplicative training.*** If an operator has previously received training in a topic specified in paragraph (l)(3) of this section, and such training is appropriate to the truck and working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent to operate the truck safely.
4. The employer shall verify the operator being retrained/evaluated has been previously qualified, has been trained and evaluated as required by this paragraph (l). The certification/evaluation shall include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation.
5. The operator must demonstrate knowledge of the equipment's safety precautions, pre-operational checks, controls and emergency operations. The qualified trainer/observer will be determined by management to be competent by reason of training or experience.
   a. Safety Precautions:
      -Understand all general safety precautions related to the safe operation of the equipment.
   b. Basic / General knowledge of machine:
      -Understand all of the major components of the equipment.
      -Understand and explain the functions of all controls at all stations.
   c. Basic operation skills:
      -Perform basic operation skills for maintenance and or production.
   d. Workplace-related topics:
      - Surface conditions where the vehicle will be operated;
      - Composition of loads to be carried and load stability;
      - Load manipulation, stacking, and un-stacking;
      - Pedestrian traffic in areas where the equipment will be operated;
      - Narrow aisles and other restricted places where the equipment will be operated;
      -Hazardous (classified) locations where the equipment will be operated;
      -Ramps and other sloped surfaces that could affect the equipments stability;
      -Closed environments and other areas where insufficient ventilation or poor equipment maintenance could cause a buildup of carbon monoxide or diesel exhaust;
      -Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

6. The Director of Operations will ensure the posted qualification list is updated with the latest training dates and posted. In addition, conduct quarterly audit of Training/qualifications. Human Resources will ensure the employee's jacket is updated and maintained.

PERSONAL PROTECTIVE EQUIPMENT

APPLICATION

Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

In areas and on the jobs requiring safety protection, wear and properly care for any special protective equipment provided. Special protective equipment includes respirators, life jackets, hoods, hearing protection, and safety belts, etc. Worn or damaged safety equipment should be returned to your supervisor for a replacement.

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EYE PROTECTION

Eye protection must be worn at all times when in the terminal. The only exceptions are

(1) When you are between the gate and the break room.
(2) When inside break areas, offices or rest rooms.
(3) When operating vehicles or equipment with enclosed cabs.

HEAD PROTECTION

Hard hats must be worn when there is a danger of an overhead fall hazard or when working with-in the working radius of a crane. The only exceptions are

(1) When you are between the gate and the break room.
(2) When inside break areas, offices or rest rooms.
(3) When operating vehicles or equipment with overhead protective covering.

Hard Hats, which conform to ANSI Standard Z89.1-1969, will be worn at all times.

Mechanics cannot always wear head protection, especially when in an awkward position such as working on engines, motors, etc. Where the head is below the shoulders. In these situations, the hard hat will be kept nearby and handy so it can be placed on the head when the job or task is complete.

(a) Safety shoes must be worn by all outside salaried and hourly employees. The only exception will be front office employees and employees with a doctor's excuse.
(b) Reflective vest will be worn in all areas of the terminal by all personnel..

NOTE: Personal Protective Equipment will be worn in all areas mandated by your Immediate Supervisor. Your Supervisor can not allow you to wear Personal Protective Equipment that is less than Company Policy. This Policy is to include all PPE, Respiratory Protection, Electrical work and hot work

1. **Employee-Owned Equipment**
   Where employees provide their own protective equipment, the employer shall be responsible to assure its adequacy, including proper maintenance, and sanitation of such equipment.
2. **Design**
   All personal protective equipment shall be of safe design and construction for the work to be performed.

EYE AND FACE PROTECTION

GENERAL REQUIREMENTS

Each affected employee shall use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.

Each affected employee shall use eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors (e.g. clip-on or slide-on side shields) meeting the pertinent requirements of this section are acceptable.

Each affected employee who wears prescription lenses while engaged in operations that involve eye hazards shall wear eye protection that incorporates the prescription in its design, or shall wear eye protection that can be worn

over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.

Eye and face PPE shall be distinctly marked to facilitate identification of the manufacturer.

Each affected employee shall use equipment with filter lenses that have a shade number appropriate for the work being performed for protection from injurious light radiation. The following is a listing of appropriate shade numbers for various operations.

As a rule of thumb, start with a shade that is too dark to see the weld zone. Then go to a lighter shade that gives sufficient view of the weld zone without going below the minimum. In oxy fuel gas welding or cutting where the torch produces a high yellow light, it is desirable to use a filter lens that absorbs the yellow or sodium line in the visible light of the (spectrum) operation.

These values apply where the actual arc is clearly seen. Experience has shown that lighter filters may be used when the arc is hidden by the work piece.

EYE AND FACE PROTECTION SELECTION CHART

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 (P,) lenses must wear either protective devices fitted with prescription (P,) lenses or protective devices designed to be worn over regular prescription (13) eye wear.
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 may 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. See note 4. Select the darkest shade that allows task performance.

CLEANING AND MAINTENANCE

1. It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision.
2. For the purposes of compliance with §1910.132(a) and (b), PPE should be inspected, cleaned, and maintained at regular intervals so that the PPE provides the requisite protection.
3. It is also important to ensure that contaminated PPE, which cannot be decontaminated, is disposed of in a manner that protects employees from exposure to hazards.

TRAINING

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The Facility shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know at least the following:

1. When PPE is necessary
2. What PPE is necessary
3. How to properly don, doff, adjust, and wear PPE
4. The limitations of the PPE
5. The proper care, maintenance, useful life and disposal of the PPE

Each affected employee shall demonstrate an understanding of the training specified in this section, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

When a supervisor has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by this section, the supervisor shall retrain each such employee. Circumstances where retraining is required include, but are not limited to, situations where:

1. Changes in the workplace render previous training obsolete
2. Changes in the types of PPE to be used render previous training obsolete
3. Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill

The supervisor shall verify that each affected employee has received and understood the required training through a written certification that contains the name of each employee trained, the date(s) of training, and that identifies the subject of the certification.

HAZARD ASSESSMENT AND EQUIPMENT SELECTION

The Facility shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of Personal Protective Equipment (PPE). If such hazards are present, or likely to be present, will:

a. Select and have each affected employee use the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment
b. Communicate selection decisions to each affected employee
c. Select PPE that properly fits each affected employee

The Facility shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and identifies the document as a certification of hazard assessment.)

This program is intended to provide compliance assistance for employers and employees in implementing requirements for hazard assessment and the selection of Personal Protective Equipment.

CONTROLLING HAZARDS

PPE devices alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

ASSESSMENT AND SELECTION

It is necessary to consider certain general guidelines for assessing the foot, head, eye and face, and hand hazard situations that exist in an occupational or educational operation or process, and to match the protective devices to the particular hazard. It should be the, responsibility of the Safety Manager with the assistance of supervisors to exercise common sense and appropriate expertise to accomplish these tasks.

ASSESSMENT GUIDELINES

In order to assess the need for PPE the following steps should be taken:

1. **Survey** Conduct a walk-through survey of the areas in question. The purpose of the survey is to identify sources of hazards to workers and co-workers. Consideration should be given to the basic hazard categories:

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a. Impact
b. Penetration
c. Compression (roll-over)
d. Chemical
e. Heat
f. Harmful dust
g. Light (optical) radiation

2. **Sources**

During the walk-through survey the employee should observe:

a. Sources of motion (i.e., machinery or processes where any movement of tools, machine elements or particles could exist; or movement of personnel that could result in collision with stationary objects
b. Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.
c. Types of chemical exposures
d. Sources of harmful dust
e. Sources of light radiation (i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.)
f. Sources of failing objects or potential for dropping objects
g. Sources of sharp objects which might pierce the feet or cut the hands
h. Sources of rolling or pinching objects which could crush the feet
i. Layout of workplace and location of co-workers
j. Any electrical hazards

In addition, injury/accident data should be reviewed to help identify problem areas.

3. **Organize Data**

Following the walk-through survey, it is necessary to organize the data and information for use in the assessment of hazards. The objective is to prepare for an analysis of the hazards in the environment to enable proper selection of protective equipment.

4. **Analyze Data**

Having gathered and organized data on a workplace, an estimate of the potential for injuries should be made. Each of the basic hazards should be reviewed and a determination made as to the type, level of risk, and seriousness of potential injury from each of the hazards found in the area. The possibility of exposure to several hazards simultaneously should be considered.

5. **Selection Guidelines**

After completion of the procedures in paragraph 3, the general procedure for selection of protective equipment is to:

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

6. **Fitting the Device**

Careful consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected.

7. **Devices with Adjustable Features**

Adjustments should be made on an individual basis for a comfortable fit that will maintain the protective device in the proper position. Particular care should be taken in fitting devices for eye protection against

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dust and chemical splash to ensure that the devices are sealed to the face. In addition, proper fitting of helmets is important to ensure that it will not fall off during work operations. In some cases a chinstrap may be necessary to keep the helmet on an employee's head (Chin straps should break at a reasonably low force, so as to prevent a strangulation hazard). Where manufacturer's instructions are available, they should be followed carefully.

8. **Reassessment of Hazards**
   It is the responsibility of the Safety Manager to reassess the workplace hazard situation as necessary, by identifying and evaluating new equipment and processes, reviewing accident records, and reevaluating the suitability of previously selected PPE.

PERFORMING THE JOB SAFETY ANALYSIS

One way to increase the knowledge of hazards in the workplace is to conduct a job hazard analysis on individual tasks. A job safety analysis (JSA) is a procedure which helps integrate accepted safety and health principles and practices into a particular operation. In a JHA, each basic step of the job is examined to identify potential hazards and to determine the safest way to do the job. Other terms used to describe this procedure are Job Safety Analysis (JSA), Job Hazard Assessment, and Task Hazard Analysis. For the purposes of this course we will consider the words "analysis" and "assessment" as synonymous.

The term "job" is used here to indicate a fairly broad activity which may or may not include all responsibilities of a single employee. A "job" might be "forklift operator" or "warehouse manager". A job is too broad to analyze so it is broken down into "tasks". "Task" is used to mean a specific work assignment, such as "operating a grinder for a specific purpose," or "using a pressure washer in a specific application."

The Job Safety Analysis observes a worker as he/she actually perform the task. The major advantages of JSA include that it does not rely on individual memory and that the process prompts recognition of hazards. For infrequently performed or new jobs, observation may not be practical. With these, one approach is to have a group of experienced workers and supervisors complete the analysis through discussion. An advantage of this method is that more people are involved allowing for a wider base of experience and promoting a more ready acceptance of the resulting work procedure.

Initial benefits from developing a JSA will become clear in the preparation stage. The analysis process may identify previously undetected hazards and increase the job knowledge of those participating. Safety and health awareness is raised, communication between workers and supervisors is improved, and acceptance of safe work procedures is promoted.

A written work procedure based on the completed JSA can serve as a teaching aid for initial job training and as a briefing guide for infrequent jobs. It may be used as a standard for health and safety inspections or observations and it will assist in completing comprehensive accident investigations.

As the auditor observes the employee performing the task, he/she notes any activity or situation that could reasonably be perceived as presenting a potential risk of injury. The auditor then determines if each hazard identified can be abated through use of Engineering Controls. If so, the appropriate actions are taken to ensure hazard abatement through Engineering Controls. If not, the auditor then determines if the hazard can be abated through Administrative Controls. If the hazard cannot be abated through Administrative Controls the auditor then determines what PPE would be required to protect the employee.

Ideally, all jobs and their related tasks should be subjected to a JSA. This may represent a very time consuming project in which case you must prioritize your JSA to ensure that the most critical jobs are examined first. In assigning a priority for analysis of jobs the following should be considered:

- Accident frequency and severity: jobs where accidents occur frequently or where they occur infrequently but result in disabling injuries
- Potential for severe injuries or illnesses: the consequences of an accident, hazardous condition, or exposure to harmful substance are potentially severe
- Newly established jobs: due to lack of experience in these jobs, hazards may not be evident or anticipated
- Modified jobs: new hazards may be associated with changes in job procedures
- Infrequently performed jobs: workers may be at greater risk when undertaking non-routine jobs and a JHA provides a means of reviewing hazards

Preparing for the JSA

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After a job has been chosen for analysis, the next stage is to break the job into tasks. A job task is a segment of the job of sufficiently limited scope to allow a thorough job hazard analysis. Care must be taken not to make the tasks too general, thereby missing specific steps and their associated hazards.

The worker to be observed should be fully briefed on the scope and purpose of the JSA and assured that the JSA is neither a time and motion study in disguise, nor an attempt to uncover individual unsafe acts. The job, not the individual, is being studied in an effort to make it safer by identifying hazards and making modifications to eliminate or reduce them. The job should be observed during normal times and situations. For example, if a job is routinely done only at night, the JSA review should also be done at night. Similarly, only regular tools and equipment should be used. The only difference from normal operations is the fact that the worker is being observed.

Based on observations of the job, knowledge of accident and injury causes, and personal experience, the auditor notes the things that could go wrong at each step. A second observation of the job being performed may be needed in order to ensure a thorough assessment.

Five Steps of a JSA

This section is designed as an explanation of the Job Safety Analysis form included with this course. There are five primary steps to performing the JSA.

Step 1. Identify the Job to be Assessed. This section is discussed above.

Step 2. Identify The Tasks That The Job Requires. List these tasks on the form. If there are more than five tasks, use an additional form.

Step 3. Identify Potential Hazards Associated with Each Task. Note Potentially Hazardous Sources of:

A. Motion
B. Temperature Extremes
C. Chemical Exposures
D. Harmful Dust
E. Light Radiation
F. Falling Objects
G. Dropping Objects
H. Sharp Objects
I. Rolling Pinching Objects (Which Could Crush the Feet)
J. Hazards Due to Layout of the Workplace
K. Hazards Due to Location of Co-workers
L. Exposed Energized Electrical Equipment
M. Falls (Working Above Floor Level, Slips/Trips/Falls)
N. Noise
O. Stress
P. Repetitive Motion
Q. Lifting Hazards
- Twisting
- Turning
- Bending
- Reaching
- Heavy Lifting

R. Sharp Objects
S. Other

Step 4. Determine Hazard Abatement or Control by Engineering Controls or Administrative Controls:
List each hazard you identified above by Hazard Source and Task Number, such as P3 for Repetitive Motion for Task3. Then determine if the hazard can be abated through Engineering Controls. If it can, note the method. If it cannot, determine if the hazard can be abated through Administrative Controls. If it can, note the method. If it cannot, mark "Neither".

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Step 5. Determine Proper PPE. List each hazard that can not be abated through Engineering Controls or Administrative Controls, by Hazard Source and Task Number, and determine if PPE provides proper protection.

- Eye & Face Protection from Flying Particles, Molten Metal, Liquid Chemicals, Acids/Caustics, Gases/Vapors, Other. See 1910.133
- Respiratory Protection from Gases, Smokes, Sprays, Vapors, Other, Harmful Dusts, Fogs, Fumes, Mists, Gases, Smokes, Sprays, Vapors, Other. See 1910.134.
- Head Protection from Falling Objects, Electrical Conductors, Other. See 1910.135.
- Foot Protection from Falling or Rolling Objects, Objects Piercing the Sole, Electrical Hazards, Other. See 1910.136.
- Electrical Protection. See 1910.137.
- Hand Protection from Skin Absorption. Severe Cuts/ Lacerations, Severe Abrasions, Punctures, Chemical Burns, Temp. Extremes, Cuts, Electrical Shock, Amputation, See 1910.138.
- Fall Protection. See 1910.27, .66

ACCIDENT/LOSS REPORTING PROGRAM

PURPOSE

To establish a standard system for the notification and reporting of accidents involving occupational injury or illness, property damage of public or private property.

OBJECTIVES

1. To obtain the information necessary for the local, state and federal agencies and the insurance carriers.
2. To inform management of accidents resulting in serious employee injury or illness and property damage.

PROCEDURE

GENERAL REQUIREMENTS

Timely reporting, within 4 hours, of any accident or loss is mandatory. The supervisor must thoroughly investigate the cause of each accident or loss occurring within their area of operation and record their findings and recommendations on the Accident/Injury/Damage Investigation Report form (Appendix 1-1). The office copy should be critically reviewed and signed by the Safety Manager, where applicable and routed to the Director of Operations. A copy may be retained in the supervisor's file for their record.

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REPORTING EMPLOYEE INJURIES

1. Regardless of the degree of injury, the employee must report to his supervisor or in writing on the date he was injured. **THIS REPORT MUST BE COMPLETED WITHIN 24 HOURS.**

First aid/medical treatment will be provided or arranged for by the supervisor. If necessary, the injured employee will be taken to the designated medical facility as applicable.

2. The supervisor must complete the form " Accident/Injury/Damage Investigation Report form " within 24 hours. Once the supervisor is told by the employee or is aware of the work-related injury, **IT MUST BE REPORTED TO THE OFFICE WITHIN 24 HOURS EVEN IF THEY THINK THE INJURY**:
   a. Is minor;
   b. Or might have been caused by unsafe actions such as inattention;
   c. Or negligence;
   d. Or aggravated an old injury;
   e. Or is not work-related.

If the supervisor thinks any of the four above items are applicable, it should be stated on the "report" forms. **AT NO TIME SHOULD A SUPERVISOR WITHHOLD OR HINDER THE FILING OF AN EMPLOYEE INJURY REPORT TO THE OFFICE.**

3. A SUPERVISOR MUST **NOT ALLOW** AN EMPLOYEE TO RETURN TO WORK AFTER AN OCCUPATIONAL INJURY OR OCCUPATIONAL ILLNESS UNLESS THEY RECEIVE A SIGNED AUTHORIZATION TO RETURN TO WORK FROM THE TREATING PHYSICIAN. IF THE INJURED EMPLOYEE HAS BEEN OFF WORK MORE THAN 30 CALENDAR DAYS AND IS IN A NON-SEDENTARY POSITION, HE/SHE WILL BE REQUIRED TO TAKE A FIT FOR DUTY EXAM.

Upon their return to work, we will make every attempt to put employees to work within the limitations specified by the treating physician.

4. BECAUSE OF THE COMPLEXITY OF WORKER'S COMPENSATION LAWS, RULES, AND PROCEDURES, THE SUPERVISOR SHOULD NOT ATTEMPT TO ANSWER ANY QUESTIONS ABOUT WORKERS' COMPENSATION INSURANCE. REFER THE INJURED EMPLOYEE TO THE HUMAN RESOURCES OFFICE.

SERIOUS EMERGENCY REPORTING

Serious emergencies are accidents that are life threatening or require more than routine first aid. If it is necessary to call for emergency medical service and transportation outside of the facility, by dialing the number **911**, tell them you have a **serious accident.** Describe the nature of the accident, i.e. burn, fall, electrical shock, cut, etc.

Tell them the **accident location.** Give them directions to the accident site, especially the specific location. If the location is difficult to find, send an employee to meet and direct emergency vehicles.

Insist on an immediate response. Note the time you called and with whom you talked. Make sure transportation for the injured to a doctor or a hospital is immediately dispatched. Give the doctor and/or hospital notice that the injured is in transit to them.

Attend to the injured. Make sure that there is no chance of further injury to the injured employee or anyone else. Provide immediate first aid as necessary until the emergency personnel arrive.

Clear and secure the area so that emergency treatment can be administered to the employee and there is clear access to the accident site for emergency vehicles and personnel.

If after hours, notify chain of command and the Safety Manager.

After the injured has been removed from the area, **rope off the area** and do not allow access to anyone until completion of all investigations, and authorization to proceed by the Safety Manager.

Report to the office any sudden severe illness or injury occurring to employees during regular hours requiring **EMERGENCY MEDICAL TREATMENT** (such as possible heart attacks, strokes, seizures, fainting, serious injuries, etc.). These must be reported to the Safety Manager and Personnel Department **by telephone** as soon as possible. They should then contact the family of the injured employee.

OSHA NOTIFICATION. Serious injuries must also be reported to OSHA **within 8 hours.** Serious injury is defined as "any injury or illness which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers loss of any member of the body or any serious degree of permanent disfigurement".

HANDLING NON-SERIOUS ACCIDENTS

Provide first aid for the injured employee. First aid supplies are available in the kits provided in the office.

Arrange for the employee to be seen by a doctor if there is any question that the first aid treatment may not be adequate. If the employee receives medical treatment he may not return to work unless he has a release from the doctor or treatment center.

All non-serious accidents and injuries are warning signs that a serious accident may occur. Report all non-serious accidents **(see ACCIDENT REPORTING SECTION)** as soon as possible to the immediate supervisor, Safety Manager and the Office, but don't delay in taking corrective action at the site.

FIRST AID TREATMENT

The first priority in the treatment of an injured employee is to obtain proper medical attention. In an extreme emergency, immediate first aid may be necessary.

Normally we send our employees to a medical facility where first aid treatment is readily available. In the event that there may be a delay in getting to a medical facility or that there is not one reasonably accessible to provide treatment to the injured, a person with a valid certificate in **FIRST AID** training must be available at the site.

Each shift must have at least one supervisor on site at all times who is trained in First Aid. First Aid Training should be American Red Cross or American Heart Association, or their equivalent. Employees are encouraged to be CPR trained also.

PROPERTY/EQUIPMENT DAMAGE

When property or equipment, including vehicles, is damaged or stolen, it must be reported on the proper report form provided by our insurance company. A formal investigation should follow within **24 hours**. The " Accident/Injury/Damage Investigation Report" should be used and filled out immediately.

VEHICLE ACCIDENT REPORTING

1. When an employee is involved in a collision while operating a company or personal vehicle during business hours, he/she must call the police to the scene for investigation. Supervision must not interfere with police investigation.
2. The supervisor of the employee must also investigate the collision and complete the appropriate Accident/Injury/Damage Investigation Report within **24 hours**.
3. Employees, supervisors and Safety Manager must follow the Vehicle Policy.

CITIZEN/PUBLIC ACCIDENTS (NON-AUTO)

Public accidents must be reported on an accident /incident form and forwarded to the Safety Manager within **24 hours** of the time the incident occurred. The " Accident/Injury/Damage Investigation Report " form should also be completed

within **24 hours**. However, when there is a serious injury, it must be reported by telephone immediately to the Safety Office and followed by the reports listed above.

ACCIDENT/INJURY/DAMAGE INVESTIGATION REPORT

This report is to be used for the reporting or investigation of serious employee accidents/injuries, accidents involving property damage, or vehicle accidents, and any others.

RECORDKEEPING

All accidents or injuries of any type must be recorded, logged, and filed in their respective office and personnel folders as may be applicable.

EMPLOYEE INJURIES

1. **OSHA LOG OF RECORDABLE INJURIES**
   When an injury occurs which is more than a first aid injury (See definition below), this would be classified as a "recordable injury" by OSHA definition. This log of injuries will be maintained by HR on the OSHA 300 log (see OSHA Record-keeping Guidelines).

(NOTE: A "FIRST AID" injury is one which only minor injuries occur and which can normally be handled by a trained first aid person. This also includes initial treatment and a onetime follow-up visit even if treated by a physician. However, once prescription medication is provided or stitches are required, the injury is then required to be classified as a "recordable injury" per OSHA.)

VEHICLE, PROPERTY DAMAGE, AND PUBLIC LIABILITY ACCIDENT REPORTS

All other accidents and injuries reported to the office will be kept in separate accident files in order to maintain and monitor the accident history for each type category; I.E. vehicle accidents, customer property damage, and public liability. The files will identify the persons involved, i.e., driver, etc., site/location, supervisor, a short description of the accident, injury, time, date, and estimated cost.

ACCIDENT INVESTIGATION

ALL ACCIDENTS MUST BE INVESTIGATED BY THE SUPERVISOR OR SAFETY MANAGER

A supervisor's Accident/Injury/Damage Investigation Report must be filled out, signed by the supervisor, and then sent to the Safety Manager for each and every accident.

The main purpose of the investigation is not to determine who was at fault, but to understand what occurred and how to prevent it from happening again.

A sample copy of the Accident/Injury/Damage Investigation Report has been attached to this document. (See Appendix 1-1). Additional copies are available from the Safety Manager or the office. Also in computer form in the "I" drive, under COMPLIANCE,policies,safetymanual,accident investigation.

ACCIDENT INVESTIGATION PROCEDURE

PURPOSE

The purpose of accident investigation is to identify those unsafe conditions and acts which contribute to injuries in order that solutions for accident prevention may be proposed.

Accident investigation is an invaluable tool in controlling losses. Each accident must be considered a total loss unless its true cause is objectively determined and all contributing deficiencies are corrected. Thorough

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investigation, reporting, recording and corrective follow-up of each incident/accident can be time consuming. However, putting forth the necessary time and effort to prevent the recurrence of each accident is an invaluable investment that will pay compounded benefits to employees and management as the number of accidents decreases.

EMPLOYEE ACCIDENTS

All accidents regardless of whether or not they result in injury should be thoroughly investigated by the employee's immediate Supervisor and reported to the Safety Office within **24 hours.**. This should include "near miss" accidents. The investigation should be extensive enough to allow the Supervisor to suggest practical corrective action.

A written report should be made which includes:

1. Injured employee's statement concerning the accident.
2. Statements from other witnesses.
3. Complete description of the accident including the type of work in which the employee was involved.
4. Evaluation of unsafe conditions and acts.
5. Recommendations for action to prevent similar accidents.

DEFINITIONS

1. **Industrial Injury:**
   An injury arising out of and during the course of employment.
2. **Occupational Illness:**
   A disease caused by specific hazardous conditions or materials when there is a direct relationship between the conditions under which the work is performed and the occupational disease.

PROCEDURES FOR INVESTIGATING AN ACCIDENT/LOSS

CHECK THE SCENE

1. Begin where the accident occurred. The first step is to carefully examine where the injury occurred.
2. Reconstruct as much as possible the chain of events leading up to the injury, and attempt to determine the single event that caused the injury. Have the employee tell you what happened. If necessary, have him/her show you up to the point where the injury occurred. **DO NOT let them do the part of the incident that resulted in the injury.**
3. Draw a diagram of the location if it will be helpful in arriving at a conclusion.
4. Sketch in machinery, equipment and any other nearby physical objects, together with the places where witnesses were standing.

WRITE IT DOWN

1. Make notes on all facts that may relate to the cause of the injury. As an example: employee had complained of dizziness or employee had not used proper equipment, etc.
2. Write down any procedure used, i.e. unsafe act, or unsafe procedure, etc.
3. Write down any unsafe conditions in the work area, i.e. defective tools or faulty equipment noted.
4. Write down other items such as: the time of your investigation, the lighting conditions, the weather conditions, if pertinent a description of supplementary evidence, and conversations having a bearing on the case.

COLLECT THE EVIDENCE

If an injury or near miss occurs when machine parts or structures fail, it is essential to determine what failed and why. This can frequently be done without laboratory analysis and corrective action can be initiated without great expense. If, however, a detailed study is determined to be essential, then all components must be collected and submitted for study immediately if cost of analysis is economically feasible.

INTERVIEW WITNESS

It is important to interview witnesses at the scene or as soon thereafter as possible. Make brief notes and identify who gave the information. It is good practice to have the witnesses provide individual signed written statement.

INTERVIEW THE VICTIM

1. Timing is important. If the injury is minor, the interview should be made as soon as the investigation of the scene and a review of the medical report are complete.
2. If the injury is serious, selecting the right time is a judgment factor. Too soon afterward and the victim may be confused and inaccurate; waiting too long may cause them to be cautious and evasive. Let the employee tell the story as they wish without actual interrogation, but a complete picture should be encouraged. The interview must be complete, and it may be necessary to question the employee or witnesses several times in order to verify information and stories.

WEIGH THE EVIDENCE

1. It is essential to eliminate any inconsistencies in the testimony of the injured or witnesses even if further questioning is required.

2. When assembled, all facts should be reviewed for completeness before submission on the " Accident/Injury/Damage Investigation Report" to the Office. Ensure to provide a copy of all notes, sketches, pictures and/or interview sheets with the " Accident/Injury/Damage Investigation Report".

Incident Photo Procedures

- Taking Effective Photos - Always use adequate lighting; ensure unobstructed view of the area or object; date the photograph; reference the measurement (i.e. place a ruler, measuring tape, another object or person, etc. next to the area or object); and keep copies of all photos taken. The more pictures you take at the scene, the better chance a few of them will come out perfectly. Take as many photos as possible.

  Keep in mind the following tips when taking photos at the scene:
  - Begin by taking general photos of the entire scene - Take wide shots from several angles. General photos of the scene will set the stage for the more detailed photos to follow.
  - Photograph all items (vehicle, mobile equipment, building, signs, etc.) involved in the incident - Photograph their proximity to the actual incident spot, and to each other. Include enough photos to demonstrate their position at the time of the incident.
  - Photograph weather conditions - Include any clouds, rain, or falling snow. Photograph the sun and its position on the horizon. Include night photos of the sky and an illuminated moon. Photos like these can prove or disprove an at-fault employee's contention weather played a role in the incident.
  - Photograph damaged objects - Look for and take photos of objects damaged by the incident.
  - Get close-ups of damage - Take close up photos of the damaged object. Remember to take photos from different angles. Incident photos should be as detailed as possible.
  - Look for broken or damaged parts not attached to damaged object - Check around the site for any debris that came off objects at the moment of impact. Take photos from close and wide angles to help identify which object the parts came from.
  - Include photos that identify the time and date of the incident -You can take a picture of someone else's cell phone, where the time and date are projected on its screen. Make sure the incident scene is in the frame. Be sure to engage the time and date stamp function on your camera.
  - Photograph injuries - Take a visual record of injuries sustained by everyone involved in the incident. Try to capture graphic images of lacerations, contusions, abrasions, blood, and broken bones.
- Video Footage – Logistec has surveillance cameras located throughout the facility. If the incident occurs in one of these areas you will need to review footage and make a copy for future reference.

EXHIBIT 4

HAZARD COMMUNICATION AND CONTROL PROGRAM

PURPOSE

This document is the **Transport Company Inc** program for HAZARD COMMUNICATION AND CONTROL. Its purpose is to set forth guidelines and procedures for the proper handling, storage, and disposal of hazardous substances in order to ensure a healthful and safe environment for all persons engaged in activities at the company's facility.

Upon request, this document shall be made available to employees, their designated representative, and authorized, State, or Federal safety officials.

LEGAL REFERENCES

It is the intent of this document to reflect and incorporate the legal requirements of: OSHA Section 5194, AB2185, AB2187, and AB3377; Federal Hazard Communication Standard, CFR1910.1200; and SARA Title III, Emergency Planning and Community Right to Know Act of 1986, as they apply to Hazard Communication Standards.

SITE OFFICER

The Director of Operations will be the site Officer for the Hazard Communication Program. The Director of Operations will be responsible to coordinate and manage the company Hazard Communication Program.

As appropriate, the Director of Operations may designate key personnel to assist with the Hazard Communication Program.

It is the responsibility of Director of Operations with the supervisors to ensure that storage, handling, and disposal of hazardous substances takes place in accordance with the guidelines and procedures set forth in this document.

HAZARD DETERMINATION AND DISCLOSURE

Hazardous substances are those chemicals that are designated as hazardous by one of the following: the manufacturer; by the Material Safety Data Sheet; or if they are listed on the "Directors List" of hazardous chemicals, or similar Government List.

Manufacturers and suppliers are required to provide health and safety information to their customers on hazardous substances purchased. This is done through the use of Material Safety Data Sheets (MSDS), which must be provided to the purchaser prior to, or at the time of shipment.

HAZARD COMMUNICATION AND CONTROL

The company is mandated by law to maintain copies of the required SDS for each hazardous substance in the work place and to ensure that these are readily accessible to employees when they are in their work area(s).

1. An ongoing inventory shall be taken and a complete and current list, including quantity, of all hazardous substances shall be compiled for each area where such substances are stored, handled, or utilized. The inventory shall be reported to the Safety Manager's office monthly. **(See front of SDS book for Inventory Sheet)**
2. Safety Data Sheets (SDS) shall be requested from manufacturers and suppliers, and all purchases of any item containing a "Hazardous Substance" must include the MSDS with the delivery.
3. Any hazardous substance received without the Safety Data Sheet (SDS) **should not be utilized** until a follow-up request has been sent and an MSDS received. If the vendor has not provided the SDS within 25 working days of the request, the local office of OSHA shall be notified for assistance as specified in the Law.
4. **Employees** shall have the authority to make purchases that involve "hazardous materials". All "designated" company employees who purchase materials **will ensure** that vendors and suppliers are notified of the SDS requirement. And, a copy of SDS is supplied to the Director of Operations.

5. It shall be the responsibility of Director of Operations to ensure that Safety Data Sheets and hazardous substance lists are developed, maintained in a current status, and posted or filed in the work place for employee use.
6. The Director of Operations will rely upon the manufacturer's determination of hazardous material as stated in the information provided on their published Safety Data Sheet (SDS) and the designated government lists of hazardous substances.

LABELS AND OTHER FORMS OF WARNING

1. Each product, which contains hazardous substances, must be properly labeled, tagged, or clearly marked with: (1) the identity of hazardous substance(s) within; (2) appropriate hazard warnings; and (3) manufacturer's name.
2. Existing labels on incoming containers shall NOT be removed or defaced unless the container is immediately marked with the information required above.
3. If existing labels on containers received from suppliers already convey the required information, new labels do not need to be affixed.
4. Hazardous chemicals that are transferred to containers which are intended **only for "immediate use"** need not be labeled providing that such containers, upon completion of the transfer and use, shall be emptied and devoid of any hazardous residue.
5. Large containers or other stationary process containers may be labeled with signs, or other appropriate written information as long as the container to which the information applies is identified.
6. Substances that do not have the proper label and/or cannot be identified shall not be used, handled, or stored. In such cases the Director of Operations must be notified immediately. The material must then be identified and properly labeled or removed from the site under the direction of the company.

EMPLOYEE INFORMATION AND TRAINING

1. At each department, or area where hazardous substances are used or stored, employees shall be provided with information and training on:
   a. How to handle hazardous materials safely and use personal protective equipment.
   b. Where to find and how to use Safety Data Sheets (SDS) and the hazardous substances labeling system.

c. Potential physical and health hazards associated with the use of hazardous substances or mixtures.
d. Methods and observations used to detect the presence or release of hazardous substances in the work place.
e. First aid and emergency procedures to be utilized in the case of spills or accidental overexposure.
f. General safety precautions necessary to prevent or minimize exposure to hazardous substances.
g. Throughout the company, employees shall be informed whenever any temporary activity involving the use of hazardous materials is to take place. In such cases, employees shall be informed of the nature of the activity and advised of any necessary precautions or potential hazards to be avoided.
h. Employees shall be advised of the location and availability of the company's written Hazard Communication and Control program.
i. Employees shall be advised:
a). Of the right of the employee and/or the employee's physician to receive information regarding hazardous substances to which the employee may be exposed.
b). That the employee is protected against any form of discrimination due to the employee's exercise of the rights afforded to the provisions of the Hazardous Substances Information and Training Act.

OUTSIDE CONTRACTORS

Whenever outside contractors, vendors, suppliers, or emergency responders enter or work at/in the company where hazardous substances are stored or utilized, **the Director of Operations, or supervisor shall inform them that their employees may encounter hazardous substances while performing their work, and provide the visitors with access to Safety Data Sheets (SDS) and suggested appropriate protective measures.**

Further, **a site map shall be prepared** to identify the location of areas where hazardous materials are stored or in use. The site map shall be made available to emergency responders and shall be provided upon request, or at the site Officer's discretion, to employees of outside contractors, vendors, or suppliers.

Whenever it becomes necessary for an employee to perform an unfamiliar, non-routine task, which involves exposure to or utilization of a hazardous substance, the **employee's supervisor shall ensure that the employee receives appropriate safety and hazard awareness training prior to the work.**

STORAGE OF HAZARDOUS SUBSTANCES

1. To the maximum extent possible, all poisons, acids, and flammable chemicals shall be stored separately from all other substances, preferably in designated storage areas or cabinets that are approved for the type of exposure anticipated.
2. The Director of Operations shall schedule periodic inspections to ensure that all hazardous substances within the company are appropriately labeled and stored.
3. Chemicals and substances utilized in maintenance, and which are particularly vulnerable to incompatibility and possible adverse reaction or accident due to improper storage, should be minimized. To the maximum extent possible, for storage purposes, chemicals and substances should be separated into organic and inorganic groupings and further sorted into compatible families within the two major groupings.

HAZARDOUS WASTES DISPOSAL PROCEDURES AND REGULATIONS

Federal, state, and local environmental regulations require strict control of the handling, storage, and disposal of all materials identified as being hazardous or toxic to human health or the environment. Once such materials have been used within the operations, specific restrictions and procedures apply as to their disposal. The Safety Manager's office will maintain a monthly inventory based on information gathered during his survey and reporting by the department, accordingly, the following procedures shall be carried out for all departments that generate hazardous waste:

1. No hazardous waste may be dumped in drains, sewers, dumpsters, or onto the ground. The only exception is small quantities of some chemicals may be disposed of by drain or dumpster, in accordance with local Sanitation District rules or OSHA guidelines or the Safety Data Sheet (SDS).
2. The Director of Operations office shall be the contact point for all information regarding storage and disposal of hazardous materials. It will arrange for periodic removal (a minimum of quarterly, or as required by law) of hazardous waste by a licensed hazardous waste hauler as needed.
3. Department of Transportation (DOT) storage drums are required for storage of waste oils, sludge, and solvents. Prior to removal, waste oils, sludge, and solvents shall be stored in Department of Transportation (DOT) approved and labeled storage drums with lids. Labels shall clearly identify the material being stored for removal and the date it was placed in

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the drum. The average monthly quantity of each category and waste name shall be maintained and reported to the Safety Manager.

4. Hazardous wastes designated for disposal or treatment must be removed from the company by a licensed hazardous waste hauler. Arrangements for any hazardous materials disposal MUST be made through the Safety Manager's office. For removal, send an inventory sheet to the Safety Manager's office with name, quantity, and location of hazardous materials. **Before choosing the hauler, his identification and record will be checked.**
5. When hazardous waste is disposed of from a given site, a manifest list must be prepared by the hauler. Each list must identify the name and amount of each material for disposal. A copy of the Environmental Protection Agency (EPA) manifest list and any related documents MUST be forwarded to the Safety Manager's office as soon as they are completed. The ORIGINAL shall be kept on file.
   After the waste has been deposited at an approved dumpsite, another copy of the manifest will be returned to the Safety Manager's office to document proper disposal and site location.
6. The Director of Operations and affected department supervisors shall be responsible for keeping an on-going Hazardous Waste Disposal Manifest File, with copies of all information for the master file.

DISCLOSURE PROCEDURE FOR EMERGENCY RESPONDERS AND EMERGENCY RESPONSE PLAN FOR HAZARDOUS SPILLS

1. Compulsory Federal Law (SARA Title III) provides that counties adopt ordinances mandating that businesses or persons using, handling, or storing hazardous materials provide information regarding the location, type and health risks of such materials to emergency responders such as fire department and paramedics.
2. To comply with SARA Title III, the company will provide the designated area agencies the Hazardous Chemical Inventories and Emergency Response Plans. Currently the law applies only to businesses or persons using, storing or handling hazardous materials where:

THERE IS AN ESTIMATED TOTAL YEARLY USE IN EXCESS OF 55 GALLONS OF LIQUIDS, 500 POUNDS OF SOLIDS, OR 200 CUBIC FEET OF GASEOUS SUBSTANCES.

ONCE THE COMPANY HANDLES THIS AMOUNT OF PRODUCT, IT IS NECESSARY TO DETERMINE HOW MUCH WASTE IS THEN BEING GENERATED. IF IT IS NECESSARY TO RECYCLE OR DISPOSE OF WASTE THROUGH A LICENSED WASTE HAULER, RECYCLER, ETC., THEN THE COMPANY MUST THEN BECOME LICENSED AS A GENERATOR OF HAZARDOUS WASTES.

Each department shall maintain an inventory of all hazardous chemicals, the quantities, and the Safety Data Sheets. The updated inventories shall be sent to the Director of Operations' office on a monthly basis.

IMPORTANT REFERENCE INFORMATION

SAFETY DATA SHEETS

Valuable information for the safe use, handling and disposal of chemical materials on the site may be obtained from the manufacturer or supplier in the form of a Safety Data Sheet (SDS). Each SDS describes the physical and chemical properties of one chemical material or substance. It also provides information for first aid treatment and special personal protection, procedures for cleanups, and precautions for storing and handling that are appropriate to the material.

The Safety Data Sheet is designed to inform the user of the properties of the material and to suggest proper controls for protecting employees, property and the environment against injury or damage. The data sheet also helps the user set up and maintain appropriate controls so that he can avoid preventable accidents.

Below is an outline of the contents of a Safety Data Sheet.

MANUFACTURING IDENTIFICATION

Name, address and phone number of the manufacturer. Material and trade names, chemical family and other designations. Pay particular attention to the EMERGENCY TELEPHONE NUMBER. Should an emergency occur, this information should be readily available. The date the SDS was prepared is important because you should always refer to the most recent SDS for accurate information. Not only does new information on chemicals become available with time, but also product formulas change.

HAZARDOUS INGREDIENTS
Hazardous ingredients and the percent (%) concentrations in the material, as well as their toxicity; also hazardous mixtures of other substances.

PHYSICAL DATA
Properties such as boiling point, vapor pressure and density, solubility in water, evaporation rate, percent (%) volatile, and characteristic appearance and odor.

FIRE AND EXPLOSION HAZARD INFORMATION
Properties such as flash point (method of ignition), auto ignition temperature, and lower and upper limits in the air. This information is very important for materials used near sources of ignition or within poorly ventilated spaces. Also, means of extinguishment and special procedures for fire fighting.

HEALTH HAZARD DATA
Threshold limit value (TLV), effects of overexposure, and first aid treatment for eye or skin contact and inhalation. This information offers a guideline for monitoring exposure during use or handling.

REACTIVITY DATA
Stability of the material and related conditions to avoid. Other materials that are incompatible. Hazardous decomposition products and hazardous polymerization with related conditions to avoid. This information outlines conditions of use and storage under which the material will remain stable, as well as likely conditions that could cause a dangerous chemical reaction.

SPILL OR LEAK PROCEDURES
Recommended action for safe clean-ups and for final disposition without posing a hazard to people, property, or the environment.

SPECIAL PROTECTION INFORMATION
Suggestions covering the need for ventilation, respiratory protection, eye protection, gloves, and other protective equipment during exposure to the material.

SPECIAL PRECAUTIONS
Information on safe storage and handling to avoid hazardous reactions, and Department of Transportation classification.

GLOSSARY OF MATERIAL SAFETY DATA SHEET TERMS
Information sheets, such as Safety Data Sheets for hazardous or toxic substances contain words that may be unfamiliar. The following explanation of terms will help you to understand the SDS.

ACGIH:
The abbreviation for the American Conference of Governmental Industrial Hygienists. A private organization of occupational safety and health professionals. The ACGIH recommends occupational exposure limits for numerous toxic substances and it updates and revises its recommendation as more information becomes available.

CARCINOGENIC:
Capable of causing cancer.

CEILING LIMIT:
The maximum amount of toxic substance allowed to be in workroom air at any time during the day.

COMBUSTIBLE:
Able to catch fire and burn.

CONCENTRATION:
The amount of one substance in another substance.

DECOMPOSITION:
Breakdown of a chemical.

DENSITY:
How much space a given weight of substance takes up. Gold is a very dense substance because a small piece of it weighs a lot. Styrofoam is not very dense because it weighs very little but takes up a lot of space. The density of a substance is usually compared to water, which has been given a density value of one (1). Substances more dense than water (which sink in water) have a density greater than one (1); substances that float on water have a density of less than one (1).

DERMAL:
By or through the skin.

EXPLOSIVE LIMITS:
The amounts of vapor in air sufficient to form explosive mixtures. Explosive limits are expressed as **LOWER EXPLOSIVE LIMITS and UPPER EXPLOSIVE LIMITS**; these give the range of vapor concentrations in air that will explode if heated. Explosive limits are expressed as a percentage of vapor in the air.

FLAMMABLE:
Catches on fire easily and burns rapidly.

FLAMMABLE LIMITS:
See EXPLOSIVE LIMITS

FLASH POINT:
The lowest temperature at which the vapor of a substance will catch on fire, and then go out, if heat is applied. Provides an indication of how flammable a substance is. Not to be confused with IGNITION TEMPERATURE.

HEALTH HAZARD:
Anything that can have a harmful effect on health under the conditions in which it is used or produced. There can be both ACUTE and CHRONIC health hazards.

IGNITION TEMPERATURE:
The lowest temperature at which a substance will catch on fire and continue to burn. The lower the ignition temperature, the more likely the substance is going to be a fire hazard.

INFLAMMABLE:
Same as FLAMMABLE.

INGESTION:
Swallowing.

LC50:
The concentration of a substance in air that causes death in 50% of the animals exposed by inhalation. A measure of acute toxicity.

LD50.
The dose that causes death in 50% of the animals exposed by swallowing a substance. A measure of acute toxicity.

mg/kg
A way of expressing dose: milligrams (mg) of a substance per kilogram (kg) of body weight. Example: a 100 kg (220 pound) person given 10,000 mg (about 0.02 pounds) of a substance would be getting a dose of 100 mg/kg (10,000 mg/100 kg).

mg/m
A way of expressing the concentration of a substance in air: milligrams (mg) of substance per cubic meter (m) of air.

MILLIGRAM:
One one-thousandth of a gram.

MUTAGENIC:
Capable of changing cells in such a way that future cell generations are effected. Mutagenic substances are usually considered suspect carcinogens.

NIOSH:
Abbreviation for the SAFETY Institute for Occupational Safety and Health, U.S. Department of Health and Human Services. NIOSH does research on occupational safety and health questions and makes recommendations to OSHA.

ODOR THRESHOLD:
The lowest concentration of a substance's vapor, in the air, that can be smelled. Odor thresholds are highly variable depending on the individual who breathes the substance and the nature of the substance.

OXIDIZER:
Any substance that reacts violently with oxygen or that gives off large amounts of energy in a chemical reaction.

PEL:
Permissible Exposure Limit: means the same as TLV. PEL is often used in OSHA Standards instead of TLV.

PH:
A measure of how acidic or caustic (basic) a substance is on a scale of 1-14. Ph 1 indicated that a substance is very acidic; Ph 7 indicates that a substance is neutral; and Ph 14 indicates that a substance is very caustic (basic).

PPM:
Parts per million: Generally used to express small concentrations of one substance in a mixture.

REACTIVITY:
The ability of a substance to undergo change usually by combining with another substance or by breaking down. Certain conditions, such as heat and light, may cause a substance to become more reactive. Highly reactive substances may explode.

SOLUBILITY:
The amount of a substance that can be dissolved in solution, usually water.

SUSPECT CARCINOGEN:
A substance that might cause cancer in humans or animals, but has not been proven to do so.

TERATOGENIC:
Capable of causing birth defects.

TLV:
Abbreviation for Threshold Limit Value (TLV). The average 8-hour occupational exposure limit. This means that the actual exposure level may sometimes be higher, sometimes lower, but the average must not exceed the TLV. TLV's are calculated to protect most workers for a working lifetime.

TOXIC SUBSTANCE:
Any substance that can cause acute or chronic injury to the human body, or that is suspected of being able to cause disease or injury under some conditions. Many toxic substances are chemicals or chemical mixtures, but there are other kinds of toxic substances as well (bacteria and viruses, for example).

VAPOR:
The gas given off by a solid or liquid substance at ordinary temperatures.

VAPOR DENSITY:
The density of the gas given off by a substance. It is usually compared with air, which has a vapor density set at 1. If the vapor is denser than air (greater than 1) it will sink to the ground; if it is less dense than air (less than 1), it will rise.

VOLATILITY:
A measure of how quickly a substance forms vapors at ordinary temperatures. Vapor pressure is a measure of volatility. The lower the vapor pressure, the lower the volatility.

HAZARDOUS WASTE MANAGEMENT PROGRAM

TITLE AND PURPOSE

This document is Coleary's program for HAZARD WASTE MANAGEMENT. Its purpose is to set forth guidelines and procedures for the proper disposal of hazardous substances. Upon request, this document shall be made available to employees, their designated representative, and authorized State, or Federal safety officials.

LEGAL REFERENCES

It is the intent of this document to reflect and incorporate the legal requirements of: SARA Title III, the Federal Emergency Planning and Community Right to Know Act of 1986, as they apply. Also as applicable is the Resource Conservation and Recovery Act (RCRA).

SITE OFFICER

The Director of Operations will be the site Officer for the Program and will be responsible to coordinate and manage the Program in conjunction with the company's Hazard Communication Program.

It is the responsibility of Director of Operations to ensure that storage, handling, and disposal of hazardous substances takes place in accordance with the guidelines and procedures set forth in this document.

STORAGE OF HAZARDOUS SUBSTANCE

To the maximum extent possible, all poisons, acids, and flammable chemicals shall be stored separately from all other substances, preferably in designated storage areas or cabinets that are approved for the type of exposure anticipated. All flammable liquids must be stored in UL or FM approved flammable storage cabinets.

The Director of Operations shall schedule periodic inspections to ensure that all hazardous substances within the company are appropriately labeled and stored.

Chemicals and substances utilized in maintenance, and which are particularly vulnerable to incompatibility and possible adverse reaction or accident due to improper storage, should be minimized. To the maximum extent possible, for storage purposes, chemicals and substances should be separated into organic and inorganic groupings and further sorted into compatible families within the two major groupings.

HAZARDOUS WASTES DISPOSAL PROCEDURES AND REGULATIONS

Federal, state, and local environmental regulations require strict control of the handling, storage, and disposal of all materials identified as being hazardous or toxic to human health or the environment. Once such materials have been used within the operations, specific restrictions and procedures apply as to their disposal. The Safety Manager's office will maintain a monthly inventory based on information gathered during his survey and reporting by the department, accordingly, the following procedures shall be carried out for all departments that generate hazardous waste:

1. No hazardous waste may be dumped in drains, sewers, dumpsters, or onto the ground. The only exception is small quantities of some chemicals may be disposed of by drain or dumpster, in accordance with local Sanitation District rules or OSHA guidelines or the Safety Data Sheet (SDS).
2. The Director of Operations office shall be the contact point for all information regarding storage and disposal of hazardous materials. It will arrange for periodic removal (a minimum of quarterly, or as required by law) of hazardous waste by a licensed hazardous waste hauler as needed.
3. Department of Transportation (DOT) storage drums are required for storage of waste oils, sludge, and solvents. Prior to removal, waste oils, sludge, and solvents shall be stored in Department of Transportation (DOT) approved and labeled storage drums with lids. Labels shall clearly identify the material being stored for removal and the date it was placed in the drum. The average monthly quantity of each category and waste name shall be maintained and reported to the Safety Manager.
4. Hazardous wastes designated for disposal or treatment must be removed from the company **by a licensed hazardous waste hauler**. Arrangements for any hazardous materials disposal **MUST** be made through the Safety Manager's office with name, quantity, and location of hazardous materials. **Before choosing the hauler, his identification and record will be checked.**
5. When hazardous waste is designated for disposal or treatment from our site, a **"MANIFEST LIST"** must be prepared by the hauler. Each list must identify the name and amount of each material for disposal. A copy of the Environmental Protection Agency (EPA) manifest list and any related documents MUST be forwarded to the Safety Manager's office as soon as they are completed. The ORIGINAL shall be kept on file.

   After the waste has been deposited at an "approved dump site", another copy of the manifest will be returned to the Safety Manager's office to document proper disposal and site location.
6. The Director of Operations shall be responsible for keeping an on-going Hazardous Waste Disposal Manifest File, with copies of all information for the master file. As provided by law, the site Disposal Manifest File is subject to regular inspection by the local HEALTH DEPARTMENT. Appropriate fines may be levied for noncompliance.

DISCLOSURE PROCEDURE FOR EMERGENCY RESPONDERS AND EMERGENCY RESPONSE PLAN FOR HAZARDOUS SPILLS

EXHIBIT 4

1. Compulsory Federal Law (SARA Title III) provides that counties adopt ordinances mandating that businesses or persons using, handling, or storing hazardous materials provide information regarding the location, type and health risks of such materials to emergency responders such as fire department and paramedics.
2. To comply with SARA Title III, will provide the designated area the Hazardous Chemical Inventories and Emergency Response Plans. Currently the law applies only to businesses or persons using, storing or handling hazardous materials where:

THERE IS AN ESTIMATED TOTAL YEARLY USE IN EXCESS OF 55 GALLONS OF LIQUIDS, 500 POUNDS OF SOLIDS, OR 200 CUBIC FEET OF GASEOUS SUBSTANCES.

ONCE COMPANY NAME. HANDLES THIS AMOUNT OF PRODUCT, IT IS NECESSARY TO DETERMINE HOW MUCH WASTE IS THEN BEING GENERATED. IF IT IS NECESSARY TO RECYCLE OR DISPOSE OF WASTE THROUGH A LICENSED WASTE HAULER, RECYCLER, ETC., THEN COMPANY NAME. MUST THEN BECOME LICENSED AS A GENERATOR OF HAZARDOUS WASTES.

Each department shall maintain an inventory of all hazardous chemicals, the quantities, and the Safety Data Sheets. The updated inventories shall be sent to the Director of Operations office on a monthly basis. The Safety Manager's office shall assist in coordinating the program.

HEARING CONSERVATION PROGRAM

has established a Hearing Conservation Program to protect workers from the hazards of noise on the job.

OSHA regulations require that each employer implement a hearing conservation program when workers are exposed to noise levels **exceeding 85 dB**. It is not hard to exceed this level of noise on many of the jobs within our work. Typically, noise levels exceeding 85 dB are experienced when working with any type of pneumatic tools or machines, metal saws, and grinders.

has taken a conservative approach to this environmental hazard by establishing this program. The following elements establish the program:

1. An Audiometric Testing Program
2. An Employee Education and Training Program
3. Monitoring and Analysis of Workplace Noise Levels
4. Provide Suitable Engineering Control When Appropriate
5. Provide Hearing Protectors Where Required
6. Maintain Pertinent Records for The Above

AUDIOMETRIC TESTING

Each new employee will receive an Audiometric Test as part of a prescreening physical examination.

Annually, each employee exposed to noise levels **exceeding 85 dB** will be given a follow-up Audiometric examination to monitor for any significant changes in their hearing ability. Employees will be formally notified if there is any change in their hearing as the result of this testing.

EMPLOYEE EDUCATION AND TRAINING

Each new employee upon hire and annually thereafter will receive training in the Company's Hearing Conservation Program. This annual training will include the following:

1. A summary of the State noise standard;
2. Information on the effect of noise on hearing;
3. Specific information about job machine noise;
4. The role of administrative and engineering controls;
5. The contents of the Company's noise control plan;
6. A discussion of hearing protectors - the advantages and disadvantages of various types, and instructions on the selection, fitting, use, and care of the protectors; and
7. An explanation of the purpose of the audiometric testing and the test procedure, as well as the specific noise exposure for employees.

MONITORING AND ANALYSIS OF WORKPLACE NOISE LEVELS

will periodically or as necessary, conduct noise level surveys of the workplace. The results of these surveys will be made available to employees upon request.

Any job area or company location found to be in excess of the allowable designated noise levels that cannot be brought into compliance with the noise standard will be designated as an area where hearing protectors are to be worn. Signs will be posted and areas will be in

PROVIDE SUITABLE ENGINEERING CONTROLS

The noise hazard areas will be marked with caution sign denoting the necessity for personal protective equipment. Do not enter into an area marked with such signs without the proper equipment. If there is any doubt as to the level of noise in an area, vacate the area immediately and report to the supervisor.

Noise exposure levels where hearing protection will be required are as follows: (All levels are based on duration and sound levels measured on the A scale - slow response)

8 hours	85 decibels
90 minutes	102 decibels
1 hour	105 decibels
30 minutes	110 decibels
15 minutes	115 decibels

Exposure to impulsive or impact noise should not exceed 140 decibels peak sound pressure level.

Having determined the degree of noise reduction desired there are three ways to control a worker's exposure to the noise pollution.

Engineering design
Personal protective devices
Limitation of exposure time or (A combination of all three)

Some examples of the noise level of certain activities are:

10 dB	Whisper
30 dB	Quiet House
70 dB	Street Sounds
80-90 dB	Factory
85 dB	Subway
90 dB	Sander
100 dB	Pneumatic
120 dB	Drill
120 dB	Artillery

Where appropriate, will provide suitable engineering controls to reduce noise exposure. Due to the complexity of some jobs, it is difficult if not impossible to institute effective engineering controls for most noise exposures. Should this be the case, then employees will be required to wear suitable hearing protectors.

PROVIDE HEARING PROTECTORS WHERE REQUIRED

will provide and require workers hearing protectors if their **8 Hr. TWA is above 90 dB.**

will also make hearing protectors available to all employees exposed to a TWA above **85 dB**. Any employee who may have a significant threshold shift of hearing level will be required to wear hearing protectors if they are exposed to a TWA of 85 dB.

will provide workers with a choice of at least one type of earplug and one type of earmuff. On most jobs, there will be a choice of two different types of earplugs.

will make a concerted effort to find the right protector for each worker, one that offers the right attenuation, is accepted on the terms of comfort, and is **used** by the employee.

MAINTENANCE OF RECORDS

All recordkeeping for this program will be maintained by the HR office. Records will include: audiometric testing results; employee training. Safety Manager will maintain noise surveys; engineering controls implemented; and distribution and purchase of hearing protectors. Safety Manager will also maintain the spreadsheet for tracking the annual/new hire Hearing Testing. (See Appendix A)

WORK REQUIRING HEARING PROTECTORS

There are many jobs or type of work generally produce noise levels that intermittently or for short durations exceed the permissible TWA. It is the policy of to require all workers who are engaged in the following jobs to war hearing protectors;

1. Area on the pedestal when conveyor is in operation.
2. Workers using or adjacent to the use of pneumatic tools such as chippers, hammers, grinders, or others making excessive noise.
3. Extensive use of metal hammering, cutting, drilling, or forming. Use of impact devices for changing bucket cutting edges and bolts.
4. Work around operating compressors and other noisy machinery.
5. Use around sand blasting equipment.

HEARING CONSERVATION

The following summary briefly discusses the required components of the hearing conservation program. (OSHA 3074).

MONITORING

-The hearing conservation amendment requires employers to monitor noise exposure levels in a manner that will accurately identify employees who are exposed to noise at or above 85 decibels (dB) averaged over eight working hours, called an 8-hour time-weight average (TWA). The exposure measurement must include all noise within an **80 dB to 130 dB range** and must be taken during a typical work situation. This requirement is performance oriented since it allows employers to choose the monitoring method that best suits each individual situation.

-Under this revised amendment, employees are entitled to observe monitoring procedures and they must be notified of the results of the exposure monitoring of their workplace. The method used to notify employees is left to the discretion of the employers.

-Instruments used for monitoring employee exposures must be carefully checked or calibrated to ensure that the measurements are accurate. Calibration procedures are unique to specific instruments. Employers have the duty to assure that the measuring instruments they are using are properly calibrated. They may find it useful to follow the manufacturer's instructions to determine when and how extensively to calibrate.

AUDIOMETRIC TESTING

-Audiometric testing not only monitors the sharpness or acuity of an employee's hearing over time, but also provides an opportunity for employers to educate employees about their hearing and the need to protect it.
-The important elements of an audiometric testing program include baseline audiograms, annual audiograms, training, and follow-up procedures.
-Audiometric testing must be made available to all employees who have average exposure levels over an **8-hour period of 85 dB**. And the audiometric testing program follow-up should indicate whether hearing loss is being prevented by the employer's Hearing Conservation Program.
-A professional audiologist (specialist dealing with individuals having impaired hearing), an otolaryngologist (physician specializing in the diagnosis and treatment of disorders of the ear, nose, and throat), or a physician must be responsible for the program. Both professionals and trained technicians may conduct audiometric testing. The professional does not have to be present when a qualified technician is conducting testing, however. The professional responsibilities include overseeing the program and the work of the technicians, reviewing problem audiograms, and determining whether referral is necessary.
-There are two types of audiograms required in the hearing conservation program: baseline and annual audiograms.

BASELINE AUDIOGRAMS

The baseline audiogram is the reference audiogram against which future audiograms are compared. Baseline audiograms must be provided within 6 months of an employee's first exposure at or above an 8-hour time weighted average, TWA, of 85 dB. Where employers are using mobile test vans to obtain audiograms, baseline audiograms must be completed within one year after an employee's first exposure to workplace noise at or above a TWA of 85 dB. Where mobile vans are used and employers are allowed to delay baseline testing for up to a year, after 6 months their employees exposed at or above 85 dB must be issued and fitted with hearing protectors to be worn until the baseline audiogram is obtained.
Baseline audiograms taken before the effective date of this amendment are acceptable baselines in the program if the professional supervisor determines that the audiogram is valid.

AUDIOGRAM EVALUATION

If an STS is identified, employees must be fitted or refitted with adequate hearing protectors, shown how to use them, and required to wear them. Employees must be notified within 21 days from the time the determination is made that their audiometric test results showed an STS. Some employees with an STS may need to be referred for further testing if the professional determines that their test results are questionable or if they have an ear problem of a medical nature that is thought to be caused or aggravated by wearing hearing protectors. If the suspected medical problem is not thought to be related to wearing protectors, employees must be informed that they should see a physician. If subsequent audiometric tests show that the STS identified on a previous audiogram is not persistent, employees whose exposure to noise is less than a TWA of 90 dB may discontinue the wearing of hearing protectors.

A subsequent audiogram may be substituted for the original baseline audiogram if the professional supervising the program determines that the employee's STS is persistent. This substitution will ensure that the same shift is not repeatedly identified. The professional may also decide to revise the baseline audiogram if an improvement in hearing has occurred. This will ensure that the baseline reflects actual hearing thresholds to the extent possible.

HEARING PROTECTORS

Hearing protectors must be available to all workers exposed to 8-hour time-weighted average noise levels of 85 dB or above. This requirement will ensure that employees have access to protectors before they experience a loss in hearing.

Hearing protectors must be worn by:

1. Employees for any period exceeding 6 months from the time they are first exposed to 8-hour average noise levels of 85 dB or above until they receive their baseline audiograms are delayed because it is inconvenient for mobile test vans to visit the workplace more than once a year;
2. Employees exposed over the permissible exposure level, an 8-hour time-weighted average of 90 dB or above.

Employees should decide, with the help of a person who is trained in fitting hearing protectors, which size and type protector is most suitable for their working environment. The protector selected should be comfortable to wear and offer sufficient attenuation to prevent hearing loss.

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Hearing protectors must adequately reduce the severity of the noise level for each employee's work environment. The employer must reevaluate the suitability of the employee's present protector whenever there is a change in working conditions that may cause the hearing protector being used to be inadequate. If workplace noise levels increase, employees must be given more effective protectors. The protector must reduce employee exposures to at least 90 dB and to 85 dB when a standard threshold shift has already occurred in the worker's hearing. Employees must be shown how to use and care for their protectors and must be supervised on the job to ensure that they continue to wear them correctly.

TRAINING

Employee training is very important. When workers understand the reasons for the hearing conservation program's requirements and the need to protect their hearing, they will be better motivated to participate actively in the program and to cooperate by wearing their protectors and taking audiometric tests. Employees exposed to TWA's of 85 dB and above must be trained at least annually in the effects of noise, the purpose, advantages, and disadvantages of various types of hearing protectors; the selection, fitting and care of protectors; and the purpose and procedures of audiometric testing. The training program may be structured in any format, different parts being conducted by different individuals and at different times as long as the required topics are covered. The Safety Manager is responsible for ensuring initial hire and annual hearing conservation training is conducted.

RECORDKEEPING

Noise exposure measurement records must be kept for **2 years**. Records of audiometric test results must be maintained for the duration of employment of the affected employee. Audiometric test records must include the name and job classification of the employee, the date, the examiner's name, the date of acoustic or exhaustive calibration, measurements of the background sound pressure levels in audiometric test rooms, and the employee's most recent noise exposure measurement.

Recording Occupational Hearing Loss on the OSHA 300 Log

Employers must record work-related hearing loss cases when an employee's hearing test shows a marked decrease in overall hearing. If an employee's hearing test (audiogram) reveals that the employee has experienced a work-related Standard Threshold Shift (STS) in hearing in one or both ears, and the employee's total hearing level is 25 decibels (dB) or more below audiometric zero (averaged at 2000, 3000, and 4000 Hz) in the same ear(s) as the STS, you must record the case on the OSHA 300 Log. Employers can make adjustments for hearing loss caused by aging, seek the advice of a physician or licensed health care professional to determine if the loss is work related, and perform additional hearing tests to verify.

STANDARD THRESHOLD SHIFT: FOLLOWUP AND RECORDING REQUIREMENTS

I. Follow up Requirements

Step 1. When a standard threshold shift from the baseline is identified on an employee's annual audiogram, it is important to determine if this shift is persistent and work related. To make this determination, contact either the original audiometric company or a qualified second provider to obtain a retest within 30 days. The retest can be the annual audiogram.

When any audiogram shows a STS or other problem it must be reviewed by an audiologist, otolaryngologist, or physician to determine the need for further evaluation. The employer must provide the following information to the person performing this evaluation:

(A) A copy of OSHA hearing conservation standard--if needed by the reviewer;
(B) The baseline audiogram and most recent audiogram of the employee to be evaluated;
(C) Measurements of background sound pressure levels in the audiometric test room;
(D) Records of audiometer calibrations.

Step 2. If from Step 1 the standard threshold shift is determined to be persistent and work related, you must:

(A) Inform the employee *in writing* of the STS
(B) Fit the employee with hearing protectors, train the employee in their use and care, and require the employee to use them.
(C) Refit and retrain employees already using hearing protectors. Provide hearing protectors with a greater NRR, if necessary. Encourage an employee to wear dual hearing protection (ear muffs worn over insert plugs) if appropriate.

(D) Refer the employee for a clinical audio logical evaluation or an ontological examination, as appropriate, if additional testing is necessary or if a medical pathology of the ear may be caused or aggravated by the wearing of hearing protectors.
(E) Inform the employee of the need for an ontological examination if a medical pathology of the ear that is unrelated to the use of hearing protectors is suspected.

II. RECORDING REQUIREMENTS FOR OCCUPATIONAL HEARING LOSS ON THE OSHA 300 LOG

Beginning on January 1, 2003, employers were required to record work-related hearing loss cases when an employee's hearing test shows a marked decrease in overall hearing. If an employee's hearing test (audiogram) reveals that the employee has experienced a work-related Standard Threshold Shift (STS) in hearing in one or both ears, and the employee's total hearing level is 25 decibels (dB) or more below audiometric zero (averaged at 2000, 3000, and 4000 Hz) in the same ear(s) as the STS, you must record the case on the OSHA 300 Log. Employers can make adjustments for hearing loss caused by aging, seek the advice of a physician or licensed health care professional to determine if the loss is work-related, and perform additional hearing tests to verify.

Standard Threshold Shift

A Standard Threshold Shift, or STS, is defined in the occupational noise exposure standard at 29 CFR 1910.95(g)(10)(i) as a change in hearing threshold, relative to the baseline audiogram for that employee, of an average of 10 decibels (dB) or more at 2000, 3000, and 4000 hertz (Hz) in one or both ears. In this case the STS must only be reported to the employee. Please refer to the example below.

Frequency (Hz)	Baseline (dB)	Current Audiogram (dB)	Difference (dB)
2000	10	20	10
3000	5	10	5
4000	15	30	15
Average	10	20	10

STS & a 25-dB Overall Reduction in Hearing Level

If the employee has shown an STS you must then examine the employee's overall hearing ability in comparison to audiometric zero. Using the employee's current audiogram, average the hearing levels at 2000, 3000, and 4000 Hz to determine whether or not the employee's total hearing loss exceeds 25 dB from audiometric zero. In this case the STS must be reported to the employee AND recorded on the OSHA 300 log. Please refer to the example below.

Frequency (Hz)	Baseline (dB)	Current Audiogram (dB)	Difference (dB)
2000	20	30	10
3000	30	35	5
4000	10	25	15
Average	20	30	10

Entering a Hearing Loss Case in the OSHA 300 Log

In 2003, employers should record cases of occupational hearing loss either as an "injury" (single event acoustic trauma) or "other illnesses" (long term noise exposure), as appropriate to the situation. Beginning on January 1, 2004, employers will record these cases in a separate column specifically designated for occupational hearing loss on the OSHA 300 log.

EXHIBIT 4

HOUSEKEEPING

Good housekeeping is a must in this company due to the types of material and equipment used and stored, much of which needs to be readily accessible. Loose equipment, slippery surfaces and trash are contributors to slips and falls, which are a significant cause of injuries. Constant emphasis on good housekeeping can reduce these accidents.

Some basic housekeeping rules are:

1. All walkways, steps, etc. should be clear of tools, trash, boards, barrels, hoses and slipping hazards such as oil, grease and water.

2. To the maximum extent possible, floors should be kept clear of tools, trash, boards, equipment and slipping hazards such as oil, grease and water.

3. Each work area should have a storage space or locker for tools and equipment used in that area.

4. Trash and disposal containers should be placed in different areas around the work area. These containers should be emptied often enough to prevent overflowing.

5. Combustible materials such as oil or oily rags are to be placed in covered receptacles specifically for flammable material **ONLY**.

6. Access to safety equipment such as fire extinguishers or hoses **must not be blocked** by any equipment or any other material that will not allow easy, rapid access.

7. All tools and equipment should be cleaned and properly stored after use.

8. All powered hand tools should be cleaned, inspected for damage, repaired (if necessary) and stored in the proper place after use.

9. Spills should be cleaned up immediately.

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10. Non-deteriorating waste such as plastic bags, wrappers, wood, etc. will be properly disposed of in the containers provided.

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LADDER SAFETY

Falls from elevated surfaces account for a large percentage of serious accidents. The following safe practices for ladders can reduce the number and severity of these accidents.

1. Before climbing a ladder, it should be inspected for safe conditions.

2. If any ladder is found to be unsafe, remove it from service immediately and report it to the supervisor.

3. Ladders must not be placed in front of doors that open toward the ladder unless the door is locked or guarded.

4. When climbing or descending a ladder, a person should face the ladder and hold the side rails.

5. When working from a ladder, never extend further than arm's length to reach work. Move the ladder instead of extending outward.

6. Never climb a ladder, which has not been secured, particularly in windy conditions.

7. A person should not stand on top two steps or the spreader of a stepladder.

8. Someone should always hold a stepladder for a person who is working near the top.

9. Portable ladders, which have not been secured, should not be left standing unattended.

10. Ladders designated "For Emergency Use Only" should be used only in an emergency.

11. Properly secure the bottom of the ladder to prevent any movement or slipping.

12. Never use a ladder as a scaffold.

13. Ensure the ladder extends at least 3 feet above the top of the surface if using it to climb on top of a structure.

14. Set the ladder's base one foot out from its supporting structure for every 4 feet of working ladder height.

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Lockout/Tagout Procedure

I. OBJECTIVE

The objective of this procedure is to establish a means of positive control to prevent the accidental starting or activating of machinery or systems while they are being repaired, cleaned and/or serviced. This program serves to:

A. Establish a safe and positive means of shutting down machinery, equipment and systems.
B. Prohibit unauthorized personnel or remote control systems from starting machinery or equipment while it is being serviced.
C. Provide a secondary control system (tagout) when it is impossible to positively lockout the machinery or equipment.
D. Establish responsibility for implementing and controlling lockout/tagout procedures.
E. Ensure that only approved locks, standardized tags and fastening devices provided by the company will be utilized in the lockout/tagout procedures.

II. ASSIGNMENT OF RESPONSIBILITY

A. The Director of Operations will be responsible for implementing the lockout/tagout program.
B. The Director of Operations will be responsible for enforcing the program and insuring compliance with the procedures in their departments.
C. The Director of Operations will be responsible for monitoring the compliance of this procedure and will conduct the annual inspection and certification of the authorized employees.
D. An authorized employee is defined as a person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under 1910.147, The Control of Hazardous Energy (lockout/tagout). They are listed in attachment A.
E. An affected employee is defined as a person whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

III. PROCEDURES

The ensuing items are to be followed to ensure both compliance with the OSHA Control of Hazardous Energy Standard and the safety of our employees.

A. Preparation for Lockout or Tagout

Employees who are required to utilize the lockout/tagout procedure (see Attachment A) must be knowledgeable of the different energy sources and the proper sequence of shutting off or disconnecting energy means. The four main types of energy sources are:

1. electrical (most common form);
2. hydraulic or pneumatic;
3. fluids and gases; and
4. mechanical (including gravity).

More than one energy source may be utilized on some equipment and the proper procedure must be followed in order to identify energy sources and lockout/tagout accordingly.

Electrical

1. Shut off power at machine and disconnect.
2. Disconnecting means must be locked or tagged.
3. Press start button to see that correct systems are locked out.
4. All controls must be returned to their safest position.
5. Points to remember:

a. If a machine or piece of equipment contains capacitors, they must be drained of stored energy.

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b. Possible disconnecting means include the power cord, power panels (look for primary and secondary voltage), breakers, the operator's station, motor circuit, relays, limit switches, and electrical interlocks.
c. Some equipment may have a motor isolating shut-off and a control isolating shut-off.
d. If the electrical energy is disconnected by simply unplugging the power cord, the cord must be kept under the control of the authorized employee or the plug end of the cord must be locked out or tagged out.

B. Hydraulic/Pneumatic

1. Shut off all energy sources (pumps and compressors). If the pumps and compressors supply energy to more than one piece of equipment, lockout or tagout the valve supplying energy to the piece of equipment being serviced.
2. Stored pressure from hydraulic/pneumatic lines shall be drained/bled when release of stored energy could cause injury to employees.
3. Make sure controls are returned to their safest position (off, stop, standby, inch, jog, etc.).

C. Fluids and Gases

1. Identify the type of fluid or gas and the necessary personal protective equipment.
2. Close valves to prevent flow, and lockout/tagout.
3. Determine the isolating device, then close and lockout/tagout.
4. Drain and bleed lines to zero energy state.
5. Some systems may have electrically controlled valves. If so, they must be shut off and locked/tagged out.
6. Check for zero energy state at the equipment.

D. Mechanical Energy

Mechanical energy includes gravity activation, energy stored in springs, etc.

1. Block out or use die ram safety chain.
2. Lockout or tagout safety device.
3. Shut off, lockout or tagout electrical system.
4. Check for zero energy state.
5. Return controls to safest position.

E. Release from Lockout/Tagout

1. Inspection: Make certain the work is completed and inventory the tools and equipment that were used.
2. Clean-up: Remove all towels, rags, work-aids, etc.
3. Replace guards: Replace all guards possible. Sometimes a particular guard may have to be left off until the start sequence is over due to possible adjustments. However, all other guards should be put back into place.
4. Check controls: All controls should be in their safest position.
5. The work area shall be checked to ensure that all employees have been safely positioned or removed and notified that the lockout/tagout devices are being removed.
6. Remove locks/tags. Remove only your lock or tag.

F. Service or Maintenance Involving More than One Person

When servicing and/or maintenance are performed by more than one person, each authorized employee shall place his own lock or tag on the energy isolating source. This shall be done by utilizing a multiple lock scissors clamp if the equipment is capable of being locked out. If the equipment cannot be locked out, then each authorized employee must place his tag on the equipment.

G. Removal of an Authorized Employee's Lockout/Tagout by the Company

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Each location must develop written emergency procedures that comply with 1910.147(e)(3) to be utilized at that location. Emergency procedures for removing lockout/tagout should include the following:

1. Verification by employer that the authorized employee who applied the device is not in the facility.
2. Make reasonable efforts to advise the employee that his/her device has been removed. (This can be done when he/she returns to the facility).
3. Ensure that the authorized employee has this knowledge before he/she resumes work at the facility.

H. Shift or Personnel Changes

Each facility must develop written procedures based on specific needs and capabilities. Each procedure must specify how the continuity of lockout or tagout protection will be ensured at all times. See 1910.147(f)(4).

I. Procedures for Outside Personnel/Contractors

Outside personnel/contractors shall be advised that the company has and enforces the use of lockout/tagout procedures. They will be informed of the use of locks and tags and notified about the prohibition of attempts to restart or re-energize machines or equipment that are locked out or tagged out.

The company will obtain information from the outside personnel/contractor about their lockout/tagout procedures and advise affected employees of this information.

The outside personnel/contractor will be required to sign a certification form (see Attachment E). If outside personnel/contractor has previously signed a certification that is on file, additional signed certification is not necessary.

K. Training and Communication

Each authorized employee who will be utilizing the lockout/tagout procedure will be trained in the recognition of applicable hazardous energy sources, type and magnitude of energy available in the work place, and the methods and means necessary for energy isolation and control.

Each affected employee (all employees other than authorized employees utilizing the lockout/tagout procedure) shall be instructed in the purpose and use of the lockout/tagout procedure, and the prohibition of attempts to restart or re-energize machines or equipment that are locked out or tagged out.

Training will be certified using Attachment B (Authorized Personnel). The documentation of training will be retained in the company's files.

L. Periodic Inspection

A periodic inspection (at least annually) will be conducted of each authorized employee under the lockout/tagout procedure. This inspection shall be performed by the Safety Coordinator.

The inspection will include a review between the Director of Operations and each authorized employee of that employee's responsibilities under the energy control (lockout/tagout) procedure. The inspection will also consist of a physical inspection of the authorized employee while performing work under the procedures.

TRAINING EVALUATION FORM

CONTROL OF HAZARDOUS ENERGY PLAN

Logistec has a control of hazardous energy plan and procedure designed to provide a method of protection from hazardous energy situations employed with Logistec facilities. The following of this policy and procedures will help guarantee the safety of everyone on the facility site.

I understand that before participating in control of hazardous energy I must obtain knowledge in the company's Control of Hazardous Energy plan and situations that may arise in a Logistec facility. I have also been trained and understand the following:

MAINTENANCE TECHNICIAN

Yes	No	
( )	( )	I have accepted knowledge of the company's Control of Hazardous Energy plan and understand the plan is in place for everyone's protection in hazardous situations.
( )	( )	I must follow all safety rules and regulations noted in Control of Hazardous Energy plan
( )	( )	I must review all information and understand the hazards I may face dealing with hazardous energy situations.
( )	( )	I understand how to conduct a lock out / tag out procedure as designed within the Control of Hazardous Energy plan.
( )	( )	I must obey all other job and plant safety rules which may apply.
( )	( )	I understand that failure to comply with all conditions and terms of the plan will result in disciplinary action up to and including discharge.

_____ _____ _____

Date Signature Print Name

Instructor: _____ Duration of Training: _____

Annual Maintenance Technician / Training Certification

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DATE OF TRAINING: ____/____/____

INSPECTOR: _____

SIGNATURE: _____

Machine or equipment on which lock out / tag out procedures were performed:

_____

Associate(s) performing the lock out / tag out procedures:

Associate Name (Please Print) **Associate Signature**

_____ _____

_____ _____

_____ _____

_____ _____

Reviewed with associate(s) who are authorized to perform service or maintenance on the following:

1. Have you had lock out / tag out training **Yes / No** (circle one)
2. Do you have safety lock **Yes / No** (circle one)
3. Are lock out procedures for above machine / equipment available or posted? **Yes / No** (circle one)
4. Does associate(s) understand his/her lock out responsibilities: **Yes / No** (circle one)

Were all the lockout / tag out procedures performed correctly? YES / NO (circle one)

If "NO" … comments on improper lock out / tag out procedures being used (ex. list improper procedures being used that require retraining for the associate or modification of procedures):

_____

_____

_____

_____

Duration of training _____

Contractor/Other Personnel Certification Form

Date:_____

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As an outside contractor from _____, Our Company understands and agrees to follow the Logistec Lockout/Tagout Policy/Procedures when performing work on Logistec equipment/Facility. As the company representative, we agree to inform/train our company personnel on the Logistec Lockout/Tagout Policy/Procedures. We have received a copy of the Logistec Lockout/Tagout Policy/Procedures.

Printed Name: _____

Signed: _____ for Company _____

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MACHINE GUARDING PROCEDURE

The purpose of this machine guarding procedure is to prevent injury or death to personnel by requiring that certain precautions be taken before machine operation begins.

All wheels, pulleys, belts, pinch point or points of operation must be securely guarded before any machining operations begin.

Control systems must be in place using scissors, manual input and more selections. Interlocking and decision-making circuitry and output elements to a machine operating mechanism shall be in place.

An authorized person with authority and responsibility will perform specific inspections of all operating machine mechanisms to assure proper guarding.

All flywheels, belts, pulleys or nip-points less than seven feet off the ground must be guarded with a device which encloses the pulley, belt or wheel.

Prime movers to include steam, gas, oil, air engines, motors, steam and hydraulic turbines and other equipment used as a source of power, will be guarded at all points of operation where cutting, shaping, or forming is accomplished upon stock. And, shall include such other points as may offer a hazard to the operator in inserting or manipulating stock in the operation of a machine.

WARNING

Any person responsible for operating a machine who removes or otherwise defeats a guarding system without authorization will be subject to dismissal.

EMPLOYEE TRAINING

All employees who are responsible for following this procedure must receive training in the procedure. This includes employees who perform any machine operations.

Following initial training in machine guarding principals, each employee will receive an annual follow-up refresher training session. This training will be conducted by the safety manager. These sessions shall include at a minimum the following:

1. Lecture regarding this procedure including its' purpose, scope, and application.
2. Visual support materials including, but not limited to, video presentations of the importance of machine guarding.
3. Written procedure handout and a written quiz.

ENFORCEMENT / INSPECTION

Due to the severity of injury that could occur while not following these procedures, ; will strictly enforce this policy. The primary responsibility lies with each supervisor for monitoring performance of their workers. Those employees found to be in violation of these procedures will be subject to the disciplinary policy.

All surveys of workers performance shall be documented on the Company's Safety Inspection Report Form. The "inspection" must include the following information:

1. Identity of the machine or equipment and how it is guarded and how the guard operates and is utilized.
2. Date of inspection.
3. Employees included in the inspection.
4. Persons performing the inspection.
5. Corrective actions required and taken.

PHYSICAL BARRIER GUARDS

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One category is the guard that is a physical barrier that prevents accidents at the point-of-operation during a production run of successive cycles. Three main types of guards are:

1. **FIXED BARRIER**
   A non-movable enclosure guard arranged to enclose the point-of-operation before the press can be started.
   This type is superior to other methods because of its simplicity and inherent permanence. Various types of materials and methods are used in making these guards including plastics (because of the good visibility they can provide), expanded metal and metal frame guards. Fixed barrier guards should be used whenever possible and when fixed barriers are not adaptable.
2. **ADJUSTABLE BARRIER**
   Similar to the fixed barrier guard, its use is identical with the added adjust ability characteristics. When this type of guard is used, the operator must be instructed on how to make proper adjustments.
3. **INTERLOCK BARRIER**
   An interlocked guard protects by enclosing the danger zone with a shield between the operator and the hand, and is not fixed. The guard may be removed when occasional jams or other situations may require access to the point-of-operations. However, it is mechanically or electrically interlocked with the operating mechanism to prevent operations with the guard removed.

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Respiratory Protection Program

I. OBJECTIVE

The Transport Co. Inc. Respiratory Protection Program is designed to protect employees by establishing accepted practices for respirator use, providing guidelines for training and respirator selection, and explaining proper storage, use and care of respirators. This program complies with Occupational Safety and Health Administration (OSHA) respiratory protection requirements as found in 29 CFR 1910.134.

II. ASSIGNMENT OF RESPONSIBILITY

A. Employer

is responsible for providing respirators to employees when they are necessary for health protection. will provide respirators that are applicable and suitable for the intended purpose at no charge to affected employees. Any expense associated with training, medical evaluations and respiratory protection equipment will be borne by the company.

B. Program Administrator

The Program Administrator for is the Director of Operations. The program Administrator is responsible for administering the respiratory protection program. Duties of the program administrator include:

1. Identifying work areas, process or tasks that require workers to wear respirators.
2. Evaluating hazards.
3. Selecting respiratory protection options.
4. Monitoring respirator use to ensure that respirators are used in accordance with their specifications.
5. Arranging for and/or conducting training.
6. Ensuring proper storage and maintenance of respiratory protection equipment.
7. Ensuring that qualitative fit testing with "Bitrex" is performed.
8. Overseeing the medical review program.
9. Maintaining records required by the program.
10. Evaluating the program.
11. Updating written program, as needed.

C. Supervisors

Supervisors are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the supervisor include:

1. Ensuring that employees under their supervision (including new hires) receive appropriate training, and fit testing.
2. Ensuring the availability of appropriate respirators and accessories.
3. Being aware of tasks requiring the use of respiratory protection.
4. Enforcing the proper use of respiratory protection when necessary.
5. Ensuring that respirators are properly cleaned, maintained, and stored according to this program.
6. Ensuring that respirators fit well and do not cause discomfort.
7. Continually monitoring work areas and operations to identify respiratory hazards.
8. Coordinating with the Program Administrator on how to address respiratory hazards or other concerns regarding this program.

D. Employees

Each employee is responsible for wearing his or her respirator when and where required and in the manner in which they are trained. Employees must also:

1. Care for and maintain their respirators as instructed, guard them against damage, and store them in a clean, sanitary location.
2. Inform their supervisor if their respirator no longer fits well, and request a new one that fits properly.
3. Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding this program.
4. Use the respiratory protection in accordance with the manufacturer's instructions and the training received.

III. APPLICABILITY

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This program applies to all employees who are required to wear respirators during normal work operations, as well as during some non-routine or emergency operations, such as a spill of a hazardous substance.

In addition, any employee who voluntarily wears a respirator when one is not required (i.e., in certain maintenance and coating operations) is subject to the medical evaluation, cleaning, maintenance, and storage elements of this program, and will be provided with necessary training. **Employees who voluntarily wear filtering face pieces (dust masks) are not subject to the medical evaluation, cleaning, storage, and maintenance provisions of this program.**

All employees and processes that fall under the provisions of this program are listed in Attachment D.

IV. PROGRAM

A. Hazard Assessment and Respirator Selection

The Program Administrator will select respirators to be used on site, based on the hazards to which workers are exposed and in accordance with the OSHA Respiratory Protection Standard. The Program Administrator will conduct a hazard evaluation for each operation, process, or work area where airborne contaminants may be present in routine operations or during an emergency. A log of identified hazards will be maintained by the Program Administrator (See Hazard Evaluation, Attachment C). The hazard evaluations shall include:

1. Identification and development of a list of hazardous substances used in the workplace by department or work process.
2. Review of work processes to determine where potential exposures to hazardous substances may occur. This review shall be conducted by surveying the workplace, reviewing the process records, and talking with employees and supervisors.

The proper type of respirator for the specific hazard involved will be selected in accordance with the MSDS for the material being used. A list of employees and appropriate respiratory protection will be maintained by the Program Administrator (see Attachment D).

B. Updating the Hazard Assessment

The Program Administrator must revise and update the hazard assessment as needed (i.e., any time work process changes may potentially affect exposure). If an employee feels that respiratory protection is needed during a particular activity, he/she is to contact his/her supervisor or the Program Administrator. The Program Administrator will evaluate the potential hazard, and arrange for outside assistance as necessary. The Program Administrator will then communicate the results of that assessment to the employees. If it is determined that respiratory protection is necessary, all other elements of the respiratory protection program will be in effect for those tasks, and the respiratory program will be updated accordingly.

C. Training

The Program Administrator will provide training to respirator users and their supervisors on the contents of the Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection Standard. All affected employees and their supervisors will be trained prior to using a respirator in the workplace. Supervisors will also be trained prior to supervising employees that must wear respirators.

The training course will cover the following topics:

1. the Respiratory Protection Program;
2. the OSHA Respiratory Protection Standard (29 CFR 1910.134);
3. respiratory hazards encountered at and their health affects;
4. proper selection and use of respirators;
5. limitations of respirators;
6. respirator donning and user seal (fit) checks;
7. fit testing;
8. emergency use procedures;

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9. maintenance and storage;

Employees will be retrained annually or as needed (e.g., if they change departments or work processes and need to use a different respirator). Employees must demonstrate their understanding of the topics covered in the training through hands-on exercises and a written test. Respirator training will be documented by the Program Administrator and the documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

D. Voluntary Respirator Use
The Program Administrator shall authorize voluntary use of respiratory protective equipment as requested by all other workers on a case-by-case basis, depending on specific workplace conditions and the results of medical evaluations.

E. Medical Evaluation
Employees who are either required to wear respirators, or who choose to wear a half face piece APR voluntarily, must pass a medical review provided by _before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so. Any employee refusing the medical review will not be allowed to work in an area requiring respirator use.

A licensed physician at Health-works, where all company medical services are provided, will provide the medical review.

A list of employees currently included in medical surveillance is provided in Attachment D of this program.

F. Fit Testing
Employees who are required to or who voluntarily wear half-face piece APRs will be fit tested:

1. prior to being allowed to wear any respirator with a tight-fitting face piece;
2. annually; or
3. when there are changes in the employee's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).

Employees will be fit tested with the make, model, and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so that they may find an optimal fit. Fit testing of powered air purifying respirators will be conducted in the negative pressure mode.

The Program Administrator will ensure fit tests are in accordance with the OSHA Respiratory Protection Standard.

G. General Respirator Use Procedures
1. Employees will use their respirators under conditions specified in this program, and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by its manufacturer.
2. All employees shall conduct user seal checks each time they wear their respirators. Employees shall use either the positive or negative pressure check (depending on which test works best for them) as specified in the OSHA Respiratory Protection Standard.
   a. Positive Pressure Test: This test is performed by closing off the exhalation valve with your hand. Breathe air into the mask. The face fit is satisfactory if some pressure can be built up inside the mask without any air leaking out between the mask and the face of the wearer.
   b. Negative Pressure Test: This test is performed by closing of the inlet openings of the cartridge with the palm of you hand. Some masks may require that the filter holder be removed to seal off the intake valve. Inhale gently so that a vacuum occurs within the face piece. Hold your breath for ten (10) seconds. If the vacuum remains, and no inward leakage is detected, the respirator is fit properly.
3. All employees shall be permitted to leave the work area to go to the restroom to maintain their respirator for the following reasons:
   a. to clean their respirator if it is impeding their ability to work;

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b. to change filters or cartridges;
c. to replace parts; or
d. to inspect respirator if it stops functioning as intended.

Employees should notify their supervisor before leaving the area.

4. Employees are not permitted to wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures that would prevent a proper seal. Employees are not permitted to wear headphones, jewelry, or other items that may interfere with the seal between the face and the face piece.
5. Before and after each use of a respirator, an employee or immediate supervisor must make an inspection of tightness or connections and the condition of the face piece, headbands, valves, filter holders and filters. Questionable items must be addressed immediately by the supervisor and/or Program Administrator.

H. Change Schedules

Respirator cartridges shall be replaced as determined by the Program administrator, supervisor(s), and manufacturers, recommendations.

I. Cleaning

Respirators are to be regularly cleaned and disinfected at the designated respirator cleaning station. Respirators issued for the exclusive use of an employee shall be cleaned as often as necessary. Atmosphere-supplying and emergency use respirators are to be cleaned and disinfected after each use.

The following procedure is to be used when cleaning and disinfecting reusable respirators:

1. Disassemble respirator, removing any filters, canisters, or cartridges.
2. Wash the face piece and all associated parts (except cartridges and elastic headbands) in an approved cleaner-disinfectant solution in warm water (about 120 degrees Fahrenheit). Do not use organic solvents. Use a hand brush to remove dirt.
3. Rinse completely in clean, warm water.
4. Disinfect all facial contact areas by spraying the respirator with an approved disinfectant.
5. Air dry in a clean area.
6. Reassemble the respirator and replace any defective parts. Insert new filters or cartridges and make sure the seal is tight.
7. Place respirator in a clean, dry plastic bag or other airtight container.

J. Maintenance

Respirators are to be properly maintained at all times in order to ensure that they function properly and protect employees adequately. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use. No components will be replaced or repairs made beyond those recommended by the manufacturer. Repairs to regulators or alarms of atmosphere-supplying respirators will be conducted by the manufacturer.

1. All respirators shall be inspected routinely before and after each use.
2. Respirators kept for emergency use shall be inspected after each use, and at least monthly by the Program Administrator to assure that they are in satisfactory working order
3. The Respirator Inspection Checklist (Attachment E) will be used when inspecting respirators.
4. A record shall be kept of inspection dates and findings for respirators maintained for emergency use.
5. Employees are permitted to leave their work area to perform limited maintenance on their respirator in a designated area that is free of respiratory hazards. Situations when this is permitted include:
   a. washing face and respirator face piece to prevent any eye or skin irritation;
   b. replacing the filter, cartridge or canister;
   c. detection of vapor or gas breakthrough or leakage in the face piece; or
   d. detection of any other damage to the respirator or its components.

K. Storage

After inspection, cleaning, and necessary repairs, respirators shall be stored appropriately to protect against dust, sunlight, heat, extreme cold, excessive moisture, or damaging chemicals.

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1. Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each employee will clean and inspect their own air-purifying respirator in accordance with the provisions of this program, and will store their respirator in a plastic bag in the designated area. Each employee will have his/her name on the bag and that bag will only be used to store that employee's respirator.
2. Respirators shall be packed or stored so that the face piece and exhalation valve will rest in a near normal position.
3. Respirators shall not be placed in places such as lockers or toolboxes unless they are in carrying cartons.
4. The Program Administrator will store a supply of respirators and respirator components in their original manufacturer's packaging in the supply room.

L. Respirator Malfunctions and Defects

1. For any malfunction of an ASR (atmosphere-supplying respirator), such as breakthrough, face piece leakage, or improperly working valve, the respirator wearer should inform his/her supervisor that the respirator no longer functions as intended, and go to the designated safe area to maintain the respirator. The supervisor must ensure that the employee either receives the needed parts to repair the respirator or is provided with a new respirator.

All workers wearing atmosphere-supplying respirators will work with a buddy. The Program Administrator shall develop and inform employees of the procedures to be used when a buddy is required to assist a coworker who experiences an ASR malfunction.

2. Respirators that are defective or have defective parts shall be taken out of service immediately. If, during an inspection, an employee discovers a defect in a respirator, he/she is to bring the defect to the attention of his/her supervisor. Supervisors will give all defective respirators to the Program Administrator. The Program Administrator will decide whether to:
   a. temporarily take the respirator out of service until it can be repaired;
   b. perform a simple fix on the spot, such as replacing a head strap; or
   c. dispose of the respirator due to an irreparable problem or defect and supply the employee with a new respirator.

When a respirator is taken out of service for an extended period of time, the respirator will be tagged out of service, and the employee will be given a replacement of a similar make, model, and size. All tagged out respirators will be kept in the safety supply room

M. Program Evaluation

The Program Administrator will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include regular consultations with employees who use respirators and their supervisors, site inspections, air monitoring and a review of records. Items to be considered will include:

1. comfort;
2. ability to breathe without objectionable effort;
3. adequate visibility under all conditions
4. provisions for wearing prescription glasses;
5. ability to perform all tasks without undue interference; and
6. confidence in the face piece fit.

Identified problems will be noted in an inspection log and addressed by the Program Administrator. These findings will be reported to USA Inc. management, and the report will list plans to correct deficiencies in the respirator program and target dates for the implementation of those corrections.

N. Documentation and Recordkeeping

1. A written copy of this program and the OSHA Respiratory Protection Standard shall be kept in the Program Administrator's office and made available to all employees who wish to review it.

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Copies of training and fit test records shall be maintained by the Program Administrator. These records will be updated as new employees are trained, as existing employees receive refresher training, and as new fit tests are conducted.

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ATTACHMENT A

Hazard Assessment Log

Hazard Assessment Log DATE _____				
Department	Contaminants	Exposure Level (8 hr TWA*)	PEL**	Controls

ATTACHMENT B

Record of Respirator Use

Required and Voluntary Respirator Use at *USA Inc.*	
Type of Respirator	**Department/Process**
Filtering face piece (dust mask)	Voluntary use for vessel workers
Half-face piece APR or PAPR with P100 particulate filters	

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ATTACHMENT C

Hazard Evaluation

Process Hazard Evaluation for *USA Inc.* DATE_____	
Process	Noted Hazards

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ATTACHMENT D

Record of Respirator Issuance

USA Inc. Personnel in Respiratory Protection Program ***Date***				
Respiratory protection is required for and has been issued to the following personnel:				
Name	**Department**	**Job Description/ Work Procedure**	**Type of Respirator**	**Date Issued**

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ELECTRICAL SAFETY

Legal references:

1. NFPA 70 – National Electric Code
2. NFPA 70B - 'Recommended Practice for Electrical Equipment Maintenance'
3. NFPA 70E- 'Standard for Electrical Safety in the Workplace'

Definitions:

1. **Qualified Person:** The *Ontario Electrical Safety Code* defines a qualified person as:
   'Qualified person means one familiar with the construction and operation of the apparatus and the hazards involved'
2. **Authorized Person:**The *Ontario Electrical Safety Code* defines a qualified person as:
   'means a qualified person who, by the nature of their duties or occupation, is obliged to approach or handle electrical equipment; or a person who, having been warned of the hazards involved, has been instructed or authorized to do so by someone having authority to give the instruction or authorization.'
3. **Competent Person:** The *Occupational Health and Safety Act* defines a competent person as:
   "competent" person' means a person who,
   (a) is qualified because of knowledge, training and experience to organize the work and its performance,
   (b) is familiar with this Act and the regulations that apply to the work, and
   (c) has knowledge of any potential or actual danger to health or safety in the workplace;

Policies – ENERGIZED ELECTRICAL SYSTEMS (LIVE)

1. **General:** Electrical work may only be performed by a knowledgeable worker qualified by the appropriate training and / or knowledge and experience to perform the type of work involved. The worker must know the risks and hazards associated with the process, the equipment, the work area and any adjacent areas affected by the work.

Work 'Permits' or an 'unusual hazards' electrical work approval process should be developed.

Second Person – 'Safety Monitor'

Where a worker is either working on live equipment;
Or Where a worker is near exposed live electrical equipment or wiring and, because of the nature of the work or the conditions and/or the location of the work place, it is necessary for another person to be in the area to ensure the safety of the worker, a second worker who is not engaged in the work must be appointed by the supervisor as a 'safety monitor.

The function of the 'safety monitor' is to:

1) warn other people in the area of the hazard;
2) ensure that all safety precautions and procedures are complied with.
   (a) A **safety monitor** must be:
   1) informed of the duties of a 'safety monitor' and of the hazards involved in the work;
   2) trained and instructed in the procedures to follow in the event of an emergency;
   3) authorized to immediately stop any part of the work that the monitor considers dangerous;
   4) not have any other duties or interruptions that might interfere with the duties as 'safety monitor.

2. **Safety Procedures**
   All testing or work performed on electrical equipment must be performed by a qualified person or a worker under the direct supervision of the qualified person. Where the electrical equipment has a voltage in excess of 120 V (?) between any two conductors or between one conductor and ground:
   1. The qualified person, and any individuals assisting, must use all required insulated protection equipment and tools necessary to protect themselves from injury during the performance of the work; and
   2. All employees working with, or near, the live electrical equipment must be instructed and trained in the use of the insulated protective equipment and tools.
      Where electrical equipment is not live, but is capable of becoming live:
      a. No employee is to work on the equipment unless it is completely isolated by a locking device,
      b. A safety ground is properly connected to that equipment, and

c. The equipment is locked out as required by the (*name of your organization*) lockout procedures.

Rubber Gloves and Mitts

Gloves and mitts issued, or available, to workers must be tested by the worker before being used. Visual and air testing methods are to be used for daily checks. Gloves and mitts issued to or available for use by a worker are to be electrically retested following the CAN/CSA Z259.4-M standard after a maximum of four months usage. Testing must be carried out by an approved testing facility

Qualified Person

Where there is a dispute regarding the term 'qualified person' for purposes of this occupational safety and health standard, the following procedure will be used:

1. The worker or other individual(s) with concerns must raise the matter directly with the supervisor in charge of the area or work.
2. The employee's supervisor will review the employee's qualifications, level of knowledge and experience and decide upon the employee's status and work limitations as a qualified person.

Requirements of the 'Electrical Safety Monitor'

Safety monitors must be present during any work that may breach exclusion zones or during work involving energized equipment or wiring. The 'monitor' does not need to be a licensed electrician or be able to perform the electrical work themselves.

The requirements the 'safety monitor' meet are that they:

1. are competent in emergency electrical response;
2. are aware of hazards and risks;
3. be competent to observe, warn and communicate effectively;
4. warn other individuals about unsafe approaches to the electrical equipment;
5. are competent to assist with the electrical work;
6. are authorized to stop the work if necessary; and
7. not be assigned to other duties while monitoring.

To 'assist' means to facilitate the performance of the work and:

a. be competent in isolation techniques;
b. be competent to rescue the person performing the electrical work; and
c. be able to provide direct assistance in an emergency; and if necessary
d. able to provide resuscitation (assessed in the last 24 months).

Live Test

When Lockout Procedures are being used no employee is to give a 'guarantee' of isolation for the performance of a test on isolated electrical equipment where an auxiliary power source could make the equipment live. This does not apply when any live test to be performed on the electrical equipment will not be hazardous to the safety or health of the person performing the live test.

Where a 'guarantee' of isolation for the performance of a live test of isolated electrical equipment is given to a person in charge of the test, that person then becomes the person in charge of the tests, the work area and all related equipment, while the test is being performed. That person is also the person in charge of any other work that is being performed on the equipment while the 'guarantee' is in effect.

Every person performing a live test must warn all people who, during or as a result of the test, are likely to be exposed to a hazard.

Unless otherwise specified in writing by a competent electrical safety person; no employee is to work on or near live electrical equipment or wiring unless the employee is wearing outer clothing with full-length sleeves fastened at the wrists and the clothing is fabricated from tightly woven natural materials as outlined in the electrical work clothing requirements (NFPA 70E).

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Testing of insulated clothing, equipment and tools

-Determination of the protective clothing and equipment to be used is to be based on the appendices attached to this policy.
-Every article of insulated protective clothing, insulated equipment and insulated device or tool referred to in this policy must be designed, constructed and maintained to ensure it remains safe, adequate and reliable under all conditions of its intended use.
-Unless each article has been certified by a recognized testing agency before initial use, it must be checked and tested by a qualified person. It also must be tested annually (or more frequently) using an approved method to ensure it retains its integrity.
-No employee is authorized to work on electrical equipment unless that employee uses all protective and insulated clothing and equipment as required or is necessary to ensure their safety.

Electrical Test Equipment Inspections

1) Visual:

Test instruments and equipment and all associated test leads, cables, power cords, probes, and connectors shall be visually inspected daily for external defects and damage before the equipment is used. If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item is to be removed from service, and it cannot be used until repairs and tests necessary to render the equipment safe have been made.

2) Specification Check:

Look for the 1000-volt, CAT III (or 600-volt, CAT IV - not recommended for main panel boxes) rating on the front of meters and testers, and a 'double insulated' symbol on the back. There should be approval symbols from two or more independent testing agencies, such as CSA, UL, CE or TUV.
Ensure that the amperage and voltage of meter fuses is correct. Fuse voltage must be equal to or higher than the meter's voltage rating and able to support the full surge current of the maximum listed voltage at the voltage input terminals. Test equipment must perform properly in the presence of impulses on volts and amps measurement functions. Ohms and continuity functions are required to handle the full meter voltage rating without becoming a hazard.
Check the instrument's specifications to verify that the ohms and continuity circuit is protected to the same level as the voltage test circuit.

Separation of access to hazardous and non- hazardous wiring and equipment

Every reasonable attempt must be made to keep electrical wiring and equipment used for communications separate from higher voltage electrical power wiring and equipment.

Where any of the following conditions occur:

1) electrical power is supplied to communication equipment using hard wiring into a panel box;
2) the electrical power panels are located in the same electrical room; or
3) the wiring for the electrical power supply and the wiring for the communications system share the same or similar conduits or raceways.

The panel boxes and / or wiring must be clearly identified as to the hazard and voltages.

Electrical power panel boxes, breaker boxes and any equipment which could be a hazard must be isolated or secured in a manner which prevents a communication specialist, or an unqualified person, from accidentally; or within reason; intentionally opening any box or accessing any other source of voltage over the voltages determined to be safe.

The power lines into the communication panels must be protected in a manner so that a communication specialist, or an unqualified person, cannot make accidental contact with any voltage defined as hazardous.

SUPPLEMENTAL ELECTRICAL SAFETY FOR 'LIVE' EQUIPMENT AND WIRING

When working on an electrical system always consider exposed electrical parts to be 'live' until you have personally ensured that they have been properly disconnected and locked/tagged out and it has been verified that the equipment is off and all components which could store a charge have been discharged!

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A. Electrical wiring and equipment may be:

1. De-energized:
   Which means that any source of energy (electrical, mechanical, pneumatic, chemical, hydraulic) has been removed, lock/tagged out, and the removal or 'isolation' has been verified or 'guaranteed' before the work is started. *Lockout/Tagout* (see Lockout Procedures) is the placement of a padlock and/or a warning tag on an energy-isolating device (disconnect) which ensures that equipment being controlled cannot be operated until the lockout device is removed.
2. Energized (live):
   This means that the equipment is energized, or some energized parts of the equipment, have either not had all sources of electrical power turned off, or are not locked/tagged out, or are in the 'on' position. Live parts which a worker could make contact with must always be turned off and de-energized unless:
   a. The de-energization of the equipment is not possible, due to the design of the equipment or the necessity of checking a power source or power function.
   b. The de-energization of the equipment will cause an additional or increased hazard such as deactivation of emergency alarm systems, shutdown of hazardous location ventilation systems, or removal of illumination for an area.
   If it is determined that work on energized electrical equipment is necessary, safe work practices, as outlined in these policies and procedures, must be followed to prevent injury or death while the work is in process. Safe work practices include following safe procedures, using the correct personal protective equipment, using insulated tools, ensuring a 'safety monitor' is present, and having an emergency plan in place and ensuring appropriate on the job training had taken place.

B. Personal Protective Equipment

All workers who work in/around energized equipment and have the potential to come into contact with 'live' exposed parts must be provided with and use Personal Protective Equipment (PPE).

The following guidelines must be followed:

1) PPE must be used whenever there is a chance of coming into contact with exposed electrical parts. This includes simple operations such as resetting a switch inside a piece of equipment or a panel box that contains exposed live wires, connectors or contacts. .
2) The PPE used must be appropriate for the work being performed. Ensure that electrical rated gloves, insulated tools, and other test equipment or protective devices are rated in excess of the voltage levels they will be used around. Electrically rated tools must be clearly labeled with the level of voltage for which they are approved. Never exceed the tool's electrical rating!
3) Always inspect electrical tools and PPE before each use to make sure they are in good condition and work properly. If a tool has been damaged, or the PPE has tears or holes, replace the item(s) before conducting the assigned work. In order to protect electrical insulated gloves from puncture, they can be worn under thicker, heavier electrically rated leather gloves.
4) Wear non-conductive head protection if working in a location that presents a possible electrical hazard to the head (bumping into exposed lines, parts, etc.). Head Protection: Class 'E' (Electrical): is tested using 20,000 volts; or
   Class 'G' (General): is tested using 2,200 volts
5) Wear eye and face PPE, such as an approved electrical face shield and safety glasses,
   (on higher voltages a chin cup is required) whenever there is a possibility of electrical arcs or explosion. Non-conductive safety glasses with side shields should always be worn underneath a face shield. A face shield alone does not provide enough protection.
6) All test instruments and equipment (volt, amp, ohm meters) and associated leads, cables, power cords, probes, and connectors must be visually inspected for external defects and damage before the equipment is used. If any defect or damage is noted remove the item from service.
7) All electrical workers are required to wear electrically rated steel-toed boots, identified with the omega symbol, at all times.
8) Utilize approved electrical tools and fuse handling equipment that is insulated in excess of the circuit voltage indicated on the box. Never use a non-insulated tool to remove a fuse.
9) You may need to utilize insulating materials, such as non-conductive matting and insulated blankets. They are intended to provide a barrier between your body and the energizedparts.

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C. Safe Work Practices

The following work practices are part of all live electrical work procedures:

1) When normally enclosed live parts are exposed for maintenance or repair, they must be guarded to protect people from making accidental contact. Barricades can be used. If barricades are not sufficient, then an 'Electrical Safety Monitor' must be used.
2) Safety signs and tags must be used to warn employees of electrical hazards.
3) Never approach, or take any conductive object without an approved insulating handle, closer than 1 meter to any exposed energized parts. Approved electrical gloves, sleevesand/or tools must be utilized if approaching closer than 1 meter.
4) Conductive items must not be worn in the vicinity or while working on exposed energized parts.

Examples of items to avoid - jewelry, body jewelry, watch bands, bracelets, rings, key chains, necklaces, hair bands, conductive buttons, metal zippers or zipper parts, coins, etc..

5) Always use non-conducting ladders intended for electrical work when working around electricity. Ensure the ladder is clear of oils, grease or spilled liquids which could conduct electricity.
6) Do not work on circuits in wet locations or on outside outlets which don't have GFCI's (ground fault circuit interrupters) to prevent the worker's body from becoming the path to ground for 'leaking' current.
7) Ensure that all electrical boxes remain accessible at all times and never place equipment, etc. in front of them. Flammable and combustible materials should not be stored in electrical equipment rooms at any time.
8) Use instructions, signs, or barriers to protect people from electrical hazards. Always consider electrical equipment energized unless proven otherwise.
9) Never modify electrical devices beyond the intent of their design.

D. Rescue Procedures

A person working on live power voltage should never be working alone. A 'Safety Monitor', who can assist the worker, but not in the hazardous zones should be present. Electricity, even at voltages of 115V, can cause severe injury or death by causing a person's heart or lungs to stop working. Electricity can also cause minor to severe burns. Serious electrical burns often appear to be minor since most of the damage to body tissues and organs is internal. If a worker has come into contact with electricity the worker may not be able to remove themselves from the electrical source.

DO NOT ATTEMPT TO PULL THE PERSON FROM THE ELECTRICAL SOURCE WITH YOUR BARE HANDS, YOU MAY BE ELECTROCUTED.

The human body is a good conductor of electricity. If you touch a person while they are in contact with the electrical source, the electricity will flow through your body causing electrical shock. Always attempt to turn off the source of the electricity (disconnect). If the electrical source cannot readily and safely be turned off, **use a non-conducting object**, such as a fiber glass object or a wooden pole, to remove the person from the electrical source. Emergency medical services should be called as soon as possible. When the victim has been removed from the electrical source, check to see if the person is breathing and if they have a pulse. If necessary, administer CPR (if you are trained) until emergency personnel arrive at the scene. Never go near a victim that has been electrocuted by a high voltage transformer or line, even if they are no longer in direct contact with the power source, because electricity from the line or other source can arc several feet through the air and you could be electrocuted.

ELECTRICAL EQUIPMENT INSPECTION AND REPAIRS

EXTENSION CORDS, DROP LIGHTS, PORTABLE HAND TOOLS

1. If any electrical equipment is in need of repair, it is the employee's responsibility to turn it in to their supervisor for the needed repairs. The Terminal Maintenance shop will have the necessary repairs made or take steps to replace the equipment if warranted.
2. No repairs should be made on electrical equipment other than by a competent electrical repairman.

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3. It is the responsibility of each supervisor who has the equipment under his control to ensure that the equipment is returned when it is determined to be defective. No defective equipment should be used unless prior permission has been obtained.
4. Prior to issuing any portable electrical tools or equipment to employees, the supervisor will check the equipment to ensure that it is safe to use at that time.

ELECTRICALLY POWERED SHOP EQUIPMENT

1. All electrical powered shop equipment, which is rigidly wired from main switches to equipment, will be inspected on a regular basis. Any equipment found to be in an unsafe condition will be removed from service until repairs are made.
2. Grounding rods and attachments are required and must be used.

OFFICE ELECTRICAL EQUIPMENT

1. Under the Zone Inspection Program all electrically operated office equipment is inspected periodically. This includes fans, typewriters, calculators, water coolers, electrical heaters, air conditioners, etc.
2. Any equipment found to be defective will be taken out of service and tagged "do not use".

GROUNDING OF ALL EQUIPMENT

Upon installation of any electrical power service to any apparatus or device, grounding circuits will be run, attached, and inspected by a qualified electrician.

The highlighted section is what the facility will educate the general employee for electrical safety ....

ELECTRICAL SAFE WORK PRACTICES

Never handle or touch exposed wiring. If wiring is exposed report the condition to your Supervisor immediately

Do not block any electrical panels, or power sources. OSHA regulations require at least 36 inches of clearance

Never attempt to work on any electrical equipment.

Never remove or tamper with any electrical equipment that has a lock out / tag out tag attached to that piece of equipment.

Fall Protection Program

I. OBJECTIVE

The objective of the Fall Protection Program is to identify and evaluate fall hazards to which employees will be exposed, and to provide specific training as required by the Occupational Safety and Health Administration (OSHA) Fall Protection Standard, 29 CFR 1926, Subpart M.

II. POLICY

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It is the policy of to protect its employees from occupational injuries by implementing and enforcing safe work practices and appointing a competent person(s) to manage the Fall Protection Program. The Fall Protection Program shall comply with the OSHA requirements..

III. ASSIGNMENT OF RESPONSIBILITY

A. Employer

It is the responsibility of the Director of Operations to provide fall protection to affected employees, and to ensure that all employees understand and adhere to the procedures of this plan and follow all instructions.

B. Program Manager

It is the responsibility of Director of Operations as the Fall Protection Program Manager to implement this program by:

1. performing routine safety checks of work operations;
2. enforcing safety policy and procedures;
3. correcting any unsafe practices or conditions immediately;
4. training employees and supervisors in recognizing fall hazards and the use of fall protection systems;
5. maintaining records of employee training, equipment issue, and fall protection systems used at jobsites; and
6. investigating and documenting all incidents that result in employee injury.

C. Employees

It is the responsibility of all employees to:

1. understand and adhere to the procedures outlined in this program;
2. follow the instructions of safety coordinator;
3. bring to management's attention any unsafe or hazardous conditions or practices that may cause injury to either themselves or any other employees; and
4. report any incident that causes injury to an employee, regardless of the nature of the injury.

IV. TRAINING

A. All employees who may be exposed to fall hazards are required to receive training on how to recognize such hazards, and how to minimize their exposure to them. Employees shall receive training as soon after employment as possible, and before they are required to work in areas where fall hazards exist.

B. A record of employees who have received training and training dates shall be maintained by the safety coordinator. Training of employees shall include:

1. Nature of the fall hazards employees may be exposed to.
2. Correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems.
3. Use and operation of controlled access zones, guardrails, personal fall arrest systems, safety nets, warning lines, and safety monitoring systems.
4. Role of each employee in the Safety Monitoring System (if one is used).
5. Limitations of the use of mechanical equipment during roofing work on low-slope roofs (if applicable).
6. Correct procedures for equipment and materials handling, and storage and erection of overhead protection.
7. Role of each employee in alternative Fall Protection Plans (if used).
8. Requirements of the OSHA Fall Protection Standard, 29 CFR 1926, Subpart M.
9. Company requirements for reporting incidents that may cause injury to an employee.

C. Additional training shall be provided on an annual basis, or as needed when changes are made to this Fall Protection Program, an alternative Fall Protection Plan, or the OSHA Fall Protection Standard.

V. FALL PROTECTION SYSTEMS

A. Personal Fall Arrest Systems

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1. Personal fall arrest systems shall be issued to and used by employees as determined by safety coordinator and may consist of anchorage, connectors, body harness, deceleration device, lifeline, or suitable combinations. Personal fall arrest systems shall:
    a. limit the maximum arresting force to 1800 pounds;
    b. be rigged so an employee cannot free fall more than six (6) feet or contact any lower level;
    c. bring an employee to a complete stop and limit the maximum deceleration distance traveled o three and a half (3 ½) feet;
    d. be strong enough to withstand twice the potential impact energy of an employee free falling ix (6) feet (or the free fall distance permitted by the system, whichever is less);
    e. be inspected prior to each use for damage and deterioration; and
    f. be removed from service if any damaged components are detected.
2. All components of a fall arrest system shall meet the specifications of the OSHA Fall Protection Standard, and shall be used in accordance with the manufacturer's instructions.
    a. The use of non-locking snap-hooks is prohibited.
    b. Dee-rings and locking snap-hooks shall:
        i. have a minimum tensile strength of 5000 pounds; and
        ii. be proof-tested to a minimum tensile load of 3600 pounds without cracking, breaking, or suffering permanent deformation.
    c. Lifelines shall be:
        i. designed, installed, and used under the supervision of the safety coordinator;
        ii. protected against cuts and abrasions; and
        iii. equipped with horizontal lifeline connection devices capable of locking in both directions on the lifeline when used on suspended scaffolds or similar work platforms that have horizontal lifelines that may become vertical lifelines.
    d. Self-retracting lifelines and lanyards must have ropes and straps (webbing) made of synthetic fibers, and shall:
        i. sustain a minimum tensile load of 3600 pounds if they automatically limit free fall distance to two (2) feet; or
        ii. sustain a minimum tensile load of 5000 pounds (includes ripstitch, tearing, and deforming lanyards).

B. Safety Monitoring Systems
In situations when no other fall protection has been implemented, the safety coordinator or superintendents shall monitor the safety of employees in these work areas. The persons monitoring shall be:
1. competent in the recognition of fall hazards;
2. capable of warning workers of fall hazard dangers;
3. operating on the same walking/working surfaces as the employees and able to see them;
4. close enough to work operations to communicate orally with employees; and
5. free of other job duties that might distract them from the monitoring function.

No employees other than those engaged in the work being performed under the Safety Monitoring System shall be allowed in the area. All employees under a Safety Monitoring System are required to promptly comply with the fall hazard warnings of the persons monitoring.

VI. ACCIDENT INVESTIGATIONS

All incidents that result in injury to workers, as well as near misses, regardless of their nature, shall be reported and investigated. Investigations shall be conducted by the safety coordinator_as soon after an incident as possible to identify the cause and means of prevention to eliminate the risk of reoccurrence.

In the event of such an incident, the Fall Protection Program (and alternative Fall Protection Plans, if in place) shall be reevaluated by the safety coordinator to determine if additional practices, procedures, or training are necessary to prevent similar future incidents.

VII. CHANGES TO THE PLAN

Any changes to the Fall Protection Program (and alternative Fall Protection Plans, if in place) shall be approved by the safety coordinator, and shall be reviewed by a qualified person as the job progresses to determine additional practices, procedures or training needs necessary to prevent fall injuries. Affected employees shall be notified of all procedure changes, and trained if necessary. A copy of this plan, and any additional alternative Fall Protection Plans, shall be maintained at the jobsite by the Director of Operations.

VII RESCUE PLAN FOR EMPLOYEES

This facility has a 24 hours emergency response team that can be notified through any of the roaming security guards or by calling the security office.
All employees have cell phones and 2-way radios for constant communications.
Our employees must utilize the buddy system and always work in pairs when there is a need to utilize fall protection devices.

Working at Heights Rescue Procedures

Introduction

The implementation and maintenance of a safe work environment is the collective responsibility of all employees, contractors, and visitors to the jobsite. It is Logistec policy to provide prompt medical treatment when a worker is injured on the jobsite. To do this, workers may have to perform a working at heights rescue to bring down a worker who has fallen and is suspended in a safety harness.

This procedure applies to all managers, supervisors, forepersons, employees, subcontractors, and visitors of the Logistec facility.

Purpose of Working at Heights Rescues

When a worker falls and is suspended in a harness, it's important to rescue him or her as quickly as possible because of the following reasons.

- The worker may have suffered injuries during the fall and may need medical attention.
- When workers are suspended in their safety harnesses for long periods, they may suffer from blood pooling in the lower body. This can lead to suspension trauma.
- Suspended workers may panic if they are not rescued quickly.
- The event that led to the fall may create additional risks that need to be addressed.

Emergency Planning

The three main parts of emergency planning are:

- Training
- Creating an emergency plan
- Outlining rescue procedures.

Training

Employees shall attend a site-specific safety training session where they will review emergency response procedures and receive instruction on alarms and assembly areas.

- Train Logistec employees on how to perform the rescue. These employees must know how to use the equipment that is available to them at the Logistec and where they can find the equipment. They should review the rescue procedure periodically.

Emergency Response Plan

If a worker falls and is suspended by a safety harness, implement the emergency fall rescue plan by following the steps below.

- The site supervisor (or alternate foreperson) takes control of the situation.

- The site supervisor sounds the emergency alarm—verbal, two way radio and cell phone. All employees in the immediate vicinity of the incident will stop working. The site supervisor quickly evaluates the situation and identifies any further hazards that could arise.
- The site supervisor or their designee goes to get help if workers are close by. If no one is close enough, the site supervisor calls for help using two way radios or cell phone.
- The site supervisor calls 911 to notify local police, fire, and ambulance if required as well as upper Management (GM, Operations Manager and Assistant Manager, Safety Manager, Maintenance Manager
- The site supervisor (or a worker assigned to the task) isolates the incident zone and its perimeter to limit further exposure.
- The site supervisor (or a worker assigned to the task) moves all non-affected personnel to a safe zone or directs them to remain where they are.
- The site supervisor enables radio silence at the facility, except for crisis communications from emergency responders. These communications are conducted on a pre-selected "emergency only" radio channel.
- The site supervisor sends a designated worker to the security entrance gate to meet the response team (police, medical, fire, etc.) and ensure that they have a safe access path to the incident scene.
- The site supervisor assembles the rescue team at the incident site as quickly as possible to determine the best rescue procedure for the situation.

Rescue Procedures

JLG Platform Rescue — If the JLG is available on site and the suspended worker can be reached by the platform, follow the procedure below.

- Bring the JLG to the incident site and use it to reach the suspended worker.
- Ensure that rescue workers are wearing full-body harnesses attached to appropriate anchors in the JLG.
- Ensure that the JLG has the load capacity for both the rescuer(s) and the fallen worker. If the fallen worker is not conscious, two rescuers will probably be needed to safely handle the weight of the fallen worker.
- Position the JLG platform below the worker and disconnect the worker's lanyard when it is safe to do so. When the worker is safely on the JLG, reattach the lanyard to an appropriate anchor point on the JLG if possible.
- Lower the worker to a safe location and administer first aid or CPR as needed.
- Arrange transportation to hospital if required.

Forklift Man Basket Rescue – If the suspended worker can be reached by forklift utilizing a man basket the following procdures should be utilized.

- Attach man basket securely to the fork lift per attachment requirements
- Bring the fork lift to the incident site and use it to reach the suspended worker.
- Ensure that rescue workers are wearing full-body harnesses attached to appropriate anchors in the man basket.
- Ensure that the fork lift and man basket combined has the load capacity for both the rescuer(s) and the fallen worker. If the fallen worker is not conscious, two rescuers will probably be needed to safely handle the weight of the fallen worker.
- Position the man basket below the worker and disconnect the worker's lanyard when it is safe to do so. When the worker is safely in the man basket, reattach the lanyard to an appropriate anchor point on the man basket if possible.
- Lower the worker to a safe location and administer first aid or CPR as needed.
- Arrange transportation to hospital if required.

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Ladder Rescue — If a JLG or forklift with man basket is not available, use ladders to rescue the fallen worker with the procedure outlined below.

- If the fallen worker is suspended from a lifeline, move the worker (if possible) to an area that rescuers can access safely with a ladder.
- Set up the appropriate ladder(s) to reach the fallen worker.
- Rig separate lifelines for rescuers to use while carrying out the rescue from the ladder(s).
- If the fallen worker is not conscious or cannot reliably help with the rescue, at least two rescuers may be needed.
- If the fallen worker is suspended directly from a lanyard or a lifeline, securely attach a separate lowering line to the harness.
- Other rescuers on the ground (or closest work surface) should lower the fallen worker while the rescuer on the ladder guides the fallen worker to the ground (or work surface).
- Once the fallen worker has been brought to a safe location, administer first aid and treat the person for suspension trauma and any other injury.
- Arrange transportation to hospital if required.

Rescue from Work Area or Floor Below — If the fallen worker is suspended near a work area and can be safely reached from the floor below or the area from which they fell, use the following procedure.

- Ensure that rescuers are protected against falling.
- If possible, securely attach a second line to the fallen worker's harness to help rescuers pull the fallen worker to a safe area. You will need at least two strong workers to pull someone up to the level from which they fell.
- Take up any slack in the retrieving line to avoid slippage.
- Once the worker has been brought to a safe location, administer first aid and treat the person for suspension trauma and any other injury.
- Arrange transportation to hospital if required.

Post-Rescue Procedure

All non-affected workers should remain in the designated safe gathering zone until the site supervisor notifies them to do otherwise.

The site supervisor and health and safety representative should

- Begin the accident investigation.
- Quarantine all fall-arrest equipment that may have been subjected to fall fatigue effects and/or shock loading for further investigation.
- Secure the area (the OHSA requires that an accident scene not be disturbed where a fatal or critical injury has occurred).
- Determine whether or not the jobsite-specific rescue and evacuation plans were followed as designed.
- Record modifications or additions to the plans that the rescue team deems necessary.
- Record all documented communications with fire, police, MOL, and other contractors involved. (When a fall occurs and is arrested, you must notify the MOL in writing.)
- Record all documented statements from employees, witnesses, and others.
- Save all photographs of the incident.
- Record all key information such as dates, time, weather, general site conditions, and specific accident locales including sketches of the immediate incident area, complete with measurements if applicable.

Attachment A

Alternate Fall Protection Plan for
Container Operations Handling Procedure

When moving containers onto or off of a vessel, a semi-automatic spreader bar ***(If available)*** will be employed.

When a semi-automatic spreader bar cannot be used due to the capacities of the crane or the location of the containers, and we must employ the use of wire rope cables to discharge or load containers, ladders will be used on the vessel to hook the cables onto the containers.

Any ladder that will be used for this purpose must be in good condition, and have intact non-skid feet ***(Most vessel ladders will not meet these requirements)***. A second employee should foot the bottom of the ladder to secure it from slipping.

If for any reason an employee is to be allowed on top of a container, that employee must:

- Be instructed to use a ladder to gain access onto the container, with another employee securing the feet of the ladder. The ladder must extend a minimum of three feet above the top of the container.
- Be instructed as to the definition of a fall hazard is as it pertains to containers (within 3 feet of the edge).
- Be instructed to stay as far away from the edge of the container as possible.
- Be instructed to stay on hands and knees when approaching the fall hazard.
- Be instructed to move slowly when on top of the containers.

If an employee is to be allowed on top of a container for any reason, there must be a supervisor present at all times to ensure that the above instructions are followed.

Man-baskets attached to forklifts will be employed on the docks to hook or unhook the cables from the containers, eliminating the need for an employee to go on top of a container on the dock.

The supervisor will document any instructions and training given to the employee during the pre-vessel safety meeting as well as the start of the container operations.

There are three (3) elements necessary for a fire:

1. **Fuel** - Combustible material, i.e., wall coverings, paper products, furniture, etc. Flammable liquids, i.e., paints, thinners, lacquers, gasoline, and others.
2. **Heat** - Sufficient to raise the material to its ignition temperature. Primary causes can be cigarette smoking, electrical fires, grease fires, and fires caused by explosions.
3. **Oxygen** to sustain combustion. Oxygen is the one element that could be controlled by closing doors and isolating the fire as much as possible.

FIRE AND EXPLOSION PREVENTION

Each supervisor will be responsible for the following fire prevention activities:

1. Make routine inspections of fire prevention and protection systems regularly and keep in good operating condition.
2. Review evacuation routes, as applicable with employees on a regular basis for each work area. Follow the designated routes and know the pre-designated safe areas previously established.
3. Train key employees, if necessary, in the use of fire protection equipment (extinguishers, hose, etc.).
4. Be familiar with known hazards that may affect your operations inside and outside any building.
5. Coordinate with the public fire department on pre-fire plans, training and evacuation procedures, as they may apply.

FIRE EXTINGUISHERS & EQUIPMENT

General Requirements

1. Portable fire extinguishers must be maintained in a fully charged and operable condition and kept in their designated places at all times when they are not being used.
2. Extinguishers must be conspicuously located where they will be readily accessible and immediately available for use.
3. The selection of fire extinguishers for a given situation will depend upon the characteristics of a potential fire, the construction and occupancy of the individual property, the vehicle or hazard to be protected, ambient temperature conditions, and other factors.
4. The number of extinguishers required must be determined by reference to the layout criteria included in this manual.
5. Only employees who have been trained in their proper use are permitted to use fire extinguishers.

Maintenance:

1. At regular intervals, not less than annually, or when specifically indicated by an inspection, extinguishers must be thoroughly examined, recharged and/or repaired to ensure operability and safety, or replaced as needed.
2. Extinguishers removed from their locations to be recharged must be replaced by spare extinguishers during the period they are gone.
3. Each extinguisher must have a durable tag securely attached to show the maintenance or recharge date and the initial or signature of the person who performs this service.
4. Ensure Emergency Phone Numbers are posted near each phone.

FLAMMABLE AND COMBUSTIBLE LIQUID AND MATERIALS

1. Flammable liquid containers must be clearly labeled and stored in a protected, separate area.
2. Flammable liquids must be used only in small quantities and in **approved (UL or FM)**, self-closing containers.
3. Do not refuel a hot or running engine. Clean up spills before restarting.
4. Never use gasoline as a cleaner or solvent. Anyone who may do so is subject to immediate discharge.
5. Only use approved containers for the transportation of flammable liquids, especially gasoline.
6. Never use air or machines to push flammables out of barrels.

SPECIFIC HAZARDS

Smoking

Smoking is permitted in designated areas only. Don't use ashtrays as waste paper receptacles, or don't use waste paper receptacles as ashtrays.

Electrical

Make sure that all electrical cords are not frayed and that the connections with the receptacles and the machinery are intact. Do not overload wiring. If cords become warm, this is the first sign of a possible overload.

Housekeeping

1. Don't allow excess paper or combustible products to pile up in the open, near equipment, or buildings.
2. Don't allow materials or boxes to be placed in the way of exit travel.
3. Keep material away from access to electrical panels. (3 FT in each direction)

- Fire / Explosion

  - Fire Dept. 911
  - Medical Emergency
  - E.M.T. Fire Rescue 911
  - Hazardous Material / Oil Spill
  - U. S. Coast Guard - Ft. Lauderdale (954) 927-1611
  - National Spill Response (800) 424-8802

PURPOSE

The purpose of this program is for the company to maintain compliance with applicable OSHA standards and requirements regarding bloodborne pathogens. Provided below is additional information regarding how the OSHA standard is now applicable.

SCOPE AND APPLICATION

This program applies to all employees with occupational exposure to blood and other potentially infectious materials.

The risk of infection with bloodborne pathogens is dependent on the likelihood of exposure to blood and other potentially infectious materials wherever that exposure occurs.

EMPLOYEES AT RISK

DEFINITIONS: Before becoming familiar with the program, there are several definitions that should be explained which apply specifically to the program and OSHA regulation. The following definitions are included in paragraph (b) of the OSHA standard and should be clearly understood by all personnel:

BLOOD Human blood, human blood components, and products made from human blood.

Bloodborne Pathogens - Bloodborne means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B Virus (HBV) and Human Immunodeficiency Virus (HIV).

Contaminated - The presence of the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.

Contaminated Sharps - Any contaminated object that can penetrate the skin including, but not limited to, broken glass, edges of metal, wires or edges of any sharp material.

Decontamination - The use of physical or chemical means to remove, inactivate or destroy bloodborne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles and the surface or item is rendered safe for handling, use or disposal.

Occupational Exposure - Reasonably anticipated skin, eye, and mucous membrane contact with blood or other potentially infectious materials that may result from performance of employee's duties.

Universal Precautions - Treating ALL blood or body fluids as potentially infectious. *(Note: Every person who may transmit infection cannot be identified. Do not take chances because it only takes one exposure to become infected.)*

Work Place Transmission - In the work place, bloodborne pathogens are transmitted in the same ways. HBV, HIV and other pathogens may be present in:

* Blood, vaginal secretions and certain other body fluids.
* Unfixed tissues or organs other than intact skin.

Means of Transmission - The method by which the virus enters the body. This can occur in several ways:

*Accidental cuts with a sharp object that is contaminated with infected blood or body fluids.
*Getting infected blood or body fluids on the skin, especially if the skin has open sores, nicks or cuts.
*Getting infected blood or body fluids in the mucous membranes of the eyes, nose or mouth.

OTHER POTENTIALLY INFECTIOUS MATERIALS

1. **The following human body fluids:**
   a. Semen
   h. vaginal secretions

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b. Cerebrospinal fluid
c. Pleural fluid
d. Peritoneal fluid
e. Saliva in dental procedures
f. Any body fluid visibly contaminated with blood
g. All body fluids in situations where it is difficult or impossible to differentiate between body fluids
i. synovial fluid
j. pericardial fluid
k. amniotic fluid

2. **Any unfixed tissue or organ (other than intact skin) from a human (living or dead)**
3. **HIV** - containing cells or tissue cultures, organ cultures, and HIV - or **HBV** - containing culture medium or other solutions: and
4. **Blood, organs, or other tissue from experimental animals infected with HIV or HBV.**

REGULATED WASTE

1. Liquid or semi-liquid blood or other potentially infectious materials;
2. Contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed;
3. Items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling;
4. Contaminated sharps; and
5. Pathological and microbiological wastes containing blood or other potentially infectious materials.

INTRODUCTION

Employees incur risk each time they are exposed to bloodborne pathogens. Any exposure incident may result in infection and subsequent illness. Since it is possible to become infected from a single exposure incident, exposure incidents must be prevented whenever possible.

EXPOSURE CONTROL PLAN

To eliminate or minimize employee exposure to blood and other potentially infectious materials, the company was required by OSHA to develop a written **Exposure Control Plan.**

The **Exposure Control Plan** consists of the following elements:

1. The exposure determination;
2. The schedule and method of implementing other applicable portions of this program, i.e. methods of compliance and recordkeeping provisions; and
3. The procedures for evaluating circumstances surrounding an exposure incident.

One key element of the Exposure Control Plan is the exposure determination. In the exposure determination, we must identify and document the job classifications where occupational exposure to blood can occur. This determination will "be made without regard to using personal protective equipment".

METHODS OF COMPLIANCE

There are various methods of compliance or control against exposure to bloodborne pathogens. It is mandatory that employees utilize at least one of the following methods when there is exposure or potential exposure to blood and/or other potentially infectious materials:

1. Universal precautions;
2. Engineering and work practice controls;
3. Personal protective equipment; and
4. Housekeeping.

UNIVERSAL PRECAUTIONS

Universal Precautions is an approach to infection control. According to the concept of Universal Precautions, all human blood and certain body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne

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pathogens. All employees must follow the written program for **UNIVERSAL PRECAUTIONS** as outlined in this manual.

ENGINEERING CONTROLS

Engineering controls are controls that isolate or remove the bloodborne pathogens hazard from the workplace. Examples of engineering controls that the company requires employees to use include the following:

1. Hand washing facilities and/or antiseptic hand cleaners must be readily accessible to all employees.
2. Should sharps containers be necessary, we will utilize color-coded and puncture resistant ones.
3. Eyewash stations with at least a 15-minute flow capacity will be made available to all affected employees.

Engineering controls and work practice controls shall be used in preference to other methods as good industrial hygiene practices and are compatible in adherence to traditional controls.

MAINTENANCE OF CONTROLS

To ensure their effectiveness, engineering controls shall be examined and maintained or replaced on a regularly scheduled basis. **At least monthly,** the effectiveness of the program is to be evaluated by the Safety Manager as part of their safety survey. The engineering controls are subject to periodic replacement or preventative maintenance by the Safety Manager.

WORK PRACTICE CONTROLS

Work practice controls reduce the likelihood of exposure by altering the manner in which a task is performed. While work practice controls act on the source of the hazard, the protection they provide is based on management and employee behavior rather than installation of a physical device such as a protective shield.

Some examples of work practice requirements for designated employees, which are included in the MEDICAL SAFETY PROGRAM, are:

1. Hand washing is required when gloves are removed and as soon as possible after contact with body fluids.
2. Personal protective equipment (PPE) is to be removed after leaving the work area. It must be properly discarded by placing it in the appropriate container followed by hand washing.
3. Where there is a potential for exposure to bloodborne pathogens, the following activities are strictly prohibited and employees should:
   a. Never eat or drink in the area;
   b. Do not apply cosmetics or lip balm; and
   c. Do not insert or adjust contact lenses.
4. All procedures involving the handling or potential exposure to blood or other potentially infectious material will be performed in such a way as to minimize exposure to splashing, spraying, or related exposure.

Training records:

a. Records of each training session conducted including: The date, summary of the content, names and job titles of attendees, and names and qualifications of the trainers, must be maintained for three years from the date of the training session, and made available for inspection and copying to employees, and authorized OSHA representatives upon request.
b. Copies of the employee's training are placed in the employee's personnel file.

General First Aid Response - Always remember: If not trained in first aid, make as little contact with the injured worker as possible. If the injured worker is bleeding, leave on all regular personal protective equipment and get a pair of leak-proof gloves (latex or rubber) to wear under work gloves. THIS PROCEDURE MAY SEEM TRIVIAL; BUT WEARING LEAK-PROOF GLOVES CAN LITERALLY BE A LIFE SAVER.

Emergency Assistance - In case of emergency:

* Know what to do before an emergency occurs.
* Find a trained emergency care person (first aid trained) if not trained you.
* Do not take unnecessary risks.

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* Shut off machinery if necessary and qualified to operate.
* Ensure someone notifies management and calls 911 for assistance.
* Do whatever must be done to save a life - BUT:
  Do Not Touch Blood or Body Fluids
  Do Not Give Unprotected Mouth-to-Mouth Resuscitation
* Wait for emergency professionals to arrive on scene.
* If you do get blood or other potentially infectious materials on the skin, immediately wash with non-abrasive soap and water. If the mucous membranes of the eyes, nose or mouth are exposed, immediately flush with running water at a sink or eyewash station.
* Considering the information above, focus should be given to stopping bleeding.
* Stay with the injured person.

Clean Up - Safely taking care of the accident victim is just the start of removing infectious bloodborne diseases from the work place. A hazardous situation continues to exist until:
* The entire area is cleaned of blood and/or body fluids.
* Contaminated cleaning equipment has been disinfected or disposed of properly and safely.

Housekeeping - When cleaning blood or body fluids on the job:
* Wear gloves to protect the hands. It is even recommended that two pairs of gloves are worn when cleaning up after an accident. Avoid tearing the gloves on equipment.
* Put on leak-proof apron so blood and/or body fluids will not get on clothes.
* Restrict access to the affected area.
* Use disposable towels to soak up most of the blood.
* Put all contaminated towels and waste in a sealed color-coded or labeled leak-proof container. Dispose of it as regulated waste.
* Clean with an appropriate disinfecting solution. Ten parts water to one part bleach will do. Bleach will kill both HIV and HBV. After cleaning, promptly disinfect mops and any other cleaning equipment. Otherwise the virus may spread to other areas.

Other Exposure Hazards - Accidents are not the only times when concern should be given in dealing with blood and other potentially infectious body fluids. Sometimes hazards that is less obvious while performing routine cleaning or maintenance tasks. These hazards are just as dangerous as an accident. For example; Blood may be present in vomit, urine or feces. Wear gloves and protective equipment if you must clean surfaces soiled with body fluids or excretions. Blood, even if it cannot be seen, can be almost anywhere that has to be cleaned such as:
*Toilets
*Sinks
*Trash

Be Prepared -
*Always wear gloves and a protective smock or apron whenever there is the slightest risk.
*Be alert for sharp objects such as broken glass or can lids when emptying trash.
*Do not pick up broken glass directly with the hands. Use a brush and dustpan.
*Place contaminated sharp objects and other contaminated wastes or cleaning materials in sturdy, puncture resistant, leak-proof containers and dispose of them.

Common Sense Rules - Be sure to wash hands and remove any protective clothing before:
Eating
Drinking
Smoking
Applying cosmetics or lip balm
Handling contact lenses

Keep hands away from the face, especially the nose, mouth and eyes while cleaning.

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Hand washing - This is one of the best defenses against spreading infection, including HBV and HIV. Always wash hands with non-abrasive soap and water at the end of the shift and after removing work gloves.

Summary: Protection from bloodborne diseases on the job requires knowing the facts, practicing good hygiene and taking a few sensible precautions. These are measures, which can be controlled. They are vitally important, so take them seriously.

FIRST AID

Management will maintain a program, which will provide a trained first aid person. Every effort will be made to have members of supervision and the workforce trained and certified in first aid.

It is also policy that a first aid kit with supplies approved by management be maintained in a weatherproof container with individual sealed pack packages for each item. The contents of the kit should be checked at least weekly.

As a minimum, the first aid kit will consist of a weatherproof container with individual sealed packages for each type of item. The contents will include a sufficient quantity of at least the following items:

Gauze roller bandages, 1 and 2 inch
Gauze compress bandages, 4 inch
Adhesive bandages, 1 inch
Triangular bandage, 40 inch
Ammonia inhalants and ampoules
Antiseptic applicators or swabs
Burn dressing
Eye dressing
Wire or thin board splints
Forceps and tourniquet
Leak-proof latex or rubber gloves

The primary objective in first aid is to sustain life by utilizing basic life support techniques to:

Maintain an airway
Maintain breathing
Maintain circulation
Control bleeding
Treat for shock
Get medical care for the victim

The first aid provider must avoid panic, offer reassurance, inspire confidence and do what is necessary until medical help arrives.

RECORDKEEPING

believes that the only valid means of reviewing and identifying trends and deficiencies in a safety program is through an effective recordkeeping program. The recordkeeping element is also essential in tracking the performance of duties and responsibilities under the program.

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This company is committed to implementing and maintaining an active, up to date recordkeeping program.

Injury and Illness Data

will maintain records of all work related injuries and illnesses to our associates and employees.

The following records are applicable only to work related injuries and illnesses.

Applicable forms or records:

- OSHA 300, Log of Work-Related Injuries and Illnesses or equivalent if required.
- OSHA 300A, Summary of Work-Related Injuries and Illnesses
- Supervisor's Report of Employee Injury Investigation
- STATE FORMS AS REQUIRED

The OSHA 300 Log of Work-Related Injuries and Illnesses will be maintained. The OSHA 301 Injury and Illness Incident Report or an acceptable equivalent will be established bearing a case number correlating with a case identifier on the OSHA 300 Log and all pertinent and required information. The information contained in or entered on these records will be maintained current within 6 working days of a recordable accident.

The OSHA 300A Summary will be posted in a conspicuous location for employee review no later than each February 1, for the previous calendar year, and will remain in place for a period of not less than 3 months.

All data pertaining to injuries or illnesses that did not require medical treatment, or were otherwise not recordable on the above-mentioned documents, will be maintained in written record form. This will include first aid treatment of any kind.

All injury and illness documentation will be reviewed on a regular basis by management and supervisors to analyze occurrences, identify developing trends and plan courses of corrective actions.

SAFETY PROGRAM ANALYSIS AND EVALUATION

will review and analyze all records and documentation pertaining to the safety and health program and a written report will be prepared of the findings. This review will be conducted on an annual basis and will focus on hazard analysis and recognition of developing trends.

Trend analysis will identify recurring accidents and near miss incidents resulting in or potentially involving injury, illness and/or property damage. The analysis will also recognize repeatedly identified hazards/violations needing corrective action to establish what program component is failing that allows the hazard to exist.

Supervisors will provide information and recommendations for corrective measures for trends developing in their areas.

Employees will be made aware of developing trends and hazard exposures as they are recognized.

Trends of accidents or hazard recurrences will be a focal point for corrective action and employee training as needed.

Corrective measures will be followed until the causal factor has been eliminated or controlled.

Employee training records will be reviewed on a regular basis to ensure an adequate and effective training program is maintained. Employees will be interviewed from time to time to establish retention of training and determine when information should be supported or repeated.

The following is a list of Audits required with the frequency:

LOTO Audit	Annually	Director of Operations
Hazardous Communicatin	Annually	Director of Operations
Safety and Health Program	Annually	Director of Operations
JSA	Annually	Director of Operations
Training	Annually	Director of Operations
Qualifications	Annually	Director of Operations
Machine Guarding	Annually	Director of Operations

Safety and Health Surveys and Inspections/Program

will maintain and review records of all safety audits and inspections that are conducted within or that affect the company, our employees or facilities.

Reports generated as a result of comprehensive surveys conducted by outside professional agencies will receive immediate attention and consideration. All hazards identified and recommendations will be acted upon in a timely manner. All methods of addressing the issues contained in the reports will be documented in writing and a copy maintained with the survey report. This documentation will also show the date corrections were made or actions taken. These reports and all associated documentation will be maintained for record and periodic review. Members of management that receive these reports will ensure the corrective actions are taken.

Checklists will be developed as part of the inspection process. Checklists will be used and maintained including the name of the person performing the evaluation and the date the inspection takes place. The inspection checklists will be reviewed by management upon completion. All discrepancies identified during the survey will be evaluated as soon as possible. The inspection checklists will be reviewed and evaluated on a regular basis to ensure current applicability. This review will be performed throughout the workplace with input from supervisors and employees. The checklist will be retained along with other applicable data for review. The list will be developed with the assistance of professionals providing comprehensive surveys. The hazards and recommendations noted in the comprehensive surveys will be given consideration for addition to the inspection checklist. Supervisors will be responsible for requisitioning and assisting in the correction process.

Safety or Other Related Meetings

will maintain accurate records of all proceedings associated with the safety and health program of this company.

Applicable forms and records

* Minutes, records and data resulting from safety meetings or other gatherings in which discussion occurs that affects the safety and health program.

A record will be maintained of all proceedings and appropriate management actions affecting the safety and health program. These records will include the name of the recorder, date, a list of attendees, details of the topics discussed and action or corrective measures suggested, recommended or taken. The purpose of these is to ensure that decisions affecting the safety and health program of this company are carried out, implemented and that results are tracked.

A recorder will be designated as responsible for keeping minutes or records at each meeting. During each subsequent meeting, the record of minutes for the previous meeting will be reviewed, discussed, resolved and the document closed with an authorized signature.

Training Records
will document and maintain records of all safety and health related training.
Applicable forms or records
* Training documentation records

All safety and health related training provided to employees of this company would be documented. This documentation will be maintained as proof of attendance and reviewed to assist in determining the need for additional or repeated training for employees on an individual basis. Records and documentation of training will include the presenters name, date of training, topic or subject, legible identification of the attendee and attendee signature. The person providing the training is responsible for generating the documentation. The training record will become part of the employee's permanent file.

Accident Investigation
will ensure proper records and documentation of all accident and incident investigation activities are maintained and reviewed.
Applicable forms and records
* Accident investigation forms and supporting data including photographs.
* Records of corrective action or preventative measures implemented.

All accidents and near miss incidents resulting in injury or illness to a person, property damage of any magnitude or the potential for either will be investigated and documented. All items on the designated accident investigation form will be addressed in detail as soon as possible following the accident/incident. The information acquired will be used and reviewed by management, supervisors and effected employees to establish all contributing factors and causes. From the investigation, a plan of corrective action will be established to prevent recurrence of the mishap. The plan of corrective action and implementation will be documented and reviewed by management.

Equipment Inspection and Maintenance
will maintain records and data pertaining to equipment inspection and maintenance programs performed.
Applicable forms and records
* Routine inspection and maintenance records.
* Documentation of services performed by contract agreement.
* Documentation of repair and replacement of parts or equipment.

Accurate records will be maintained involving all routine inspection and maintenance procedures performed on equipment at this company. Management will periodically review this documentation. The documentation will be utilized to determine an effective, ongoing equipment maintenance program and to ensure compliance with regulations that require inspections on certain equipment.

All records will be maintained for a minimum of one full year with the exception of the OSHA 300 form, which must be maintained for five years.

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SECTION P

LOGISTEC EVERGLADE LLC
SUBSTANCE ABUSE POLICY

GENERAL POLICY STATEMENT

Logistec Everglades LLC (Company) recognizes that the abuse of drugs and alcohol pose very serious problems. The Company has a strong commitment to provide a safe and efficient work place for all its employees and to promote high standards of employee health. The possession, consumption, sale, gift, exchange or use of controlled substances, illegal or unauthorized drugs, or alcohol and related paraphernalia on Company time or on Company property, is prohibited. Likewise, being under the influence of any non-prescribed controlled substance or of alcohol on Company time or on Company property is prohibited, as well as off-the-job illegal drug activity or alcohol abuse that adversely affects an employee's job performance or otherwise jeopardizes the safety of fellow employees, other individuals, or Company equipment. It is prohibited to be under the influence of any medication which may impair work ability, whether prescribed or not.

All applicants for employment must undergo a urine drug test and/or an alcohol screen prior to the commencement of employment for Logistec Everglades LLC.

1.0 Objectives

1. To assist in maintaining a safe and healthy working environment for the Company's employees, contractors, visitors, vendors, suppliers, customers, government officials, and members of the general public.
2. To maintain a work environment that is free from the effects of alcohol or illegal and unauthorized drugs.
3. To prevent injuries to persons and to protect the property of the company, its' employees, contractors, vendors, customers, government agencies, and the general public.
4. To protect the reputation of the Company and its employees within the community, the industry at large, and among our customers.
5. To minimize absenteeism and tardiness, improve productivity, and assure quality performance.
6. To provide a clear, understandable policy regarding substance abuse in our workplace.
7. To assure fairness and equal administration of this policy for all employees of our Company.
8. To articulate the procedures necessary for the administration of this program and policy.

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2.0 Prohibited Behavior

2.1 It is prohibited to possess, and/or use on the Company premises, or on Company time, any substance, including but not limited to alcohol, marijuana, cocaine, stimulants, depressants, narcotics, hallucinogens, prescription drugs not properly prescribed, or not for a bona fide medical use, so called "look-alike" drugs and drug paraphernalia. This clause is not intended to apply to packages received as Christmas gifts and stored in an employee's car, unless such gifts were opened on the work premises.

2.2 It is prohibited for any employee on the Company premises or on Company time to engage in work under the influence of any substance within the provisions of Section 2.1

2.3 It is prohibited for any employee on the Company premises or on Company time to engage in work when that employee has unacceptable levels of a legal substance or unacceptable levels of an illegal substance as determined by proper screening and testing. Unacceptable levels shall be determined in accordance with Attachment A. A positive test result under the Company's random testing program shall constitute a violation of this policy.

2.3 It is prohibited for any employee to engage in any negotiation, barter or agreement regarding the sale or purchase of an illegal drug.

2.4 It is prohibited for any employee to work under the influence of any medication that may impair judgment, coordination or work ability, whether prescribed by a proper person or not. Employees taking such prescription medication must report that information to company management.

3.0 Administration

3.1 The company will select a recognized testing facility at each location where the Company has a terminal facility.

3.2 The company shall issue a formal written policy to each employee hired by the Company.

4.0 Enforcement and Administration Policy

4.1 This policy shall be enforced by qualified Company representatives upon personal observation of a prohibited act or complaint of a prohibited act, or behavior consistent with substance abuse. This policy shall further be enforced through the random testing of employees pursuant to the Substance Abuse Testing Policy.

4.2 Testing/screening for the enforcement and administration of this Company policy and work rule and the determination of unacceptable levels of the substances covered

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under this policy shall be conducted under the authority of the Substance Abuse Testing Policy.

5.0 Consequences for Violation

5.1 Any employee found in violation of Section 2.1 through 2.4 of this policy will be disciplined up to and including termination of employment. No employee will be disciplined or discharged based on a positive test result unless the test has been conducted in accordance with applicable state and/or federal law.

5.2 (a) Any employee in violation of Sections 2.2 or 2.3 or both shall be immediately suspended from employment for fourteen (14) days. Employees shall then be referred to a Substance Abuse Professional (SAP) to determine if there is a chronic dependency problem, which warrants treatment at an approved rehabilitation facility, and any such employee shall be allowed to enter, for the purpose of treatment, a facility acceptable to the Substance Abuse Professional. The cost of such treatment shall be borne either by the employee or Union welfare program depending upon the employee's status and the insurance plan coverage, if any, in effect for the employee at the time he enters treatment, subject to the terms and conditions of such coverage.

(b) Employees who test positive under the substance abuse policy and are receiving treatment for their dependency will be subject to periodic random testing upon their return to work for a period of three years. Such periodic random testing shall not begin until thirty days after the employee's return to work, provided the employee is then actively enrolled in and participating in an ongoing treatment program. If the employee is a commercial motor vehicle operator, follow-up testing and random testing will be conducted in accordance with federal law.

(c) Any employee who tests positive under the substance abuse test policy within three (3) years after the first violation shall be discharged, except as provided in Section 5.5.

5.3 An employee who enters into a treatment program shall remain in the employ of the Company as long as the treatment program is successfully completed and there is no continuation of substance abuse or disregard for this policy.

5.4 Except as provided in Section 5.5, an employee who violates a section of this policy during a period of treatment or after the completion of treatment shall be dismissed from the employ of the Company.

5.5 An employee who tests positive for marijuana only, to the exclusion of all other substances, pursuant to a drug test that has been conducted more than 18 months after the employee's first violation of this policy, and whose use of marijuana as determined by a professional counselor under Section 5.2 is not chronic, shall not be subject to discharge and shall instead be suspended from employment for twenty-eight 28 (days). If such

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employee later tests positive within three (3) years of the employee's second violation, such employee shall be discharged

5.6 All employees shall be paid for all time spent in connection with initial screening or testing provided for under this policy.

5.7 No employee in a safety sensitive position or a commercial motor vehicle operator will be allowed to perform the safety sensitive function or operate the commercial motor vehicle while under the influence of any prohibited substance.

5.8 A refusal to be tested for drugs and/or alcohol will be deemed a positive test result.

5.9 Employees taking medications prescribed by a physician, that may cause impairment, must report such medication use to the company. The company may then verify that the medication will not cause impairment while working.

6.0 Policy Compliance with the Law

6.1 No part of these policies is intended to be in conflict with any state or federal law. To the extend that any section conflicts with state or federal law, then that section shall be null and void.

6.2 All test records will be kept in a confidential employee file, separate and apart from the employee's personnel file and will be maintained on a confidential basis.

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LOGISTEC EVERGLADES LLC
SUBSTANCE ABUSE TESTING POLICY

1.0 Objectives

1.1 To assist in maintaining a safe and healthy working environment for the Company's employees, contractors, visitors, vendors, suppliers, customers, government officials, and members of the general public.

1.2 To maintain a work environment that is free from the effects of alcohol or illegal and unauthorized drugs.

1.3 To prevent injuries to persons and to protect the property of the Company, its employees, contractors, vendors, customers, government agencies, and the general public.

1.4 To protect the reputation of the Company and its employees within the community, the industry at large, and among our customers.

1.5 To minimize absenteeism and tardiness, improve productivity, and assure quality performance.

1.6 To provide counseling or rehabilitation assistance for employees when appropriate.

1.7 To provide a clear, understandable policy regarding substance abuse in our workplace.

1.8 To assure fairness and equal administration of this policy for all employees of our company.

1.9 To articulate the procedures necessary for the administration of this program and policy.

2.0 Definitions

2.1 Abuse: The wrongful use of any substance, legal or illegal, which may cause an alteration of body functions. Any use of an illegal substance shall be deemed abuse.

2.2 Accident: An unplanned event which results in personal injury, damage to property, or loss of time to correct the results of the event.

2.3 Company: Logistec Everglades LLC.

2.4 Company Premises: Includes all property owned or leased, vehicles, machines and areas used temporarily for Company functions.

2.5 Designated Agent: Shall mean the medical and laboratory facilities selected by the Company to implement this policy.

2.6 Employee: Any person employed by the Company directly or under any relevant agreement.

2.7 Reasonable Suspicion: Suspicion to believe that an employee is under the influence of drugs or alcohol which adversely affects or could adversely affect the employee's judgment and job performance. Reasonable suspicion shall be based upon personal observations by a qualified representative of the Company of an employee's physical appearance, erratic behavior, speech, poor or unsafe coordination. Reasonable suspicion may also be based conduct by the employee indicating the use or possession of drugs or alcohol, or other job related circumstances indicating the use or possession of drugs or alcohol, including involvement in an accident.

2.8 Qualified Person or Representative: A qualified person or representative shall mean a person who has successfully completed the prescribed training program which is endorsed by the Company.

2.9 Substance: Any substance that is ingested, inhaled or injected or is introduced into the body by any other means that has an effect on any body function.

3.0 Reasonable Suspicion Testing and Screening

3.1 When a qualified person, as defined in Section 2.8, has reasonable suspicion to believe that another is under the influence of a substance or has abused a substance, he shall, in the presence of a Union Representative, request the testing/screening of that person for substance abuse by the Company's Designated Agent. The Union Representative is present solely in his capacity as a union representative and shall have no right to overrule the request for testing or to advise the employee not to submit to testing.

3.2 When an employee of the Company is involved in an accident involving personal injury, damage to property, or loss of time to correct the result of such accident, a qualified person may request the testing or screening of that individual.

3.3 Any employee tested under this section shall not be allowed to return to work until the results of said testing have been completed. If test results are negative, then the employee shall be paid for any lost work he would otherwise have been eligible for at the Company including any lost work while waiting for the test results.

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3.4 When a request for testing has been made, a refusal to provide an appropriate specimen will constitute a positive test result. In some cases, the employee may be unable to provide a urine specimen. After a reasonable waiting period, the Company Designated Agent may proceed with laboratory testing based upon blood specimens alone.

4.0 Random Testing

4.1 All employees engaged in the Company's Deep Sea and Terminal Operations who are on the lists of regular and casual employees maintained for the Port of Manatee, shall be required to submit to random drug and alcohol testing.

4.2 The Company's random drug and alcohol testing program, including the selection of employees to be tested and the number of employees to be tested on a monthly and annual basis, shall be in accordance with the provisions of 49 CFR Parts 382 and 391 as applicable, and shall be administered by an outside third-party designated by the Company.

4.3 Employees tested under this section of the policy shall receive pay for any time lost during testing in the random testing program. In addition, any employee tested under this section shall be allowed to return to work until the results of said testing have been completed.

4.4 When an employee has been instructed to submit to a random test under this policy, a refusal to provide an appropriate sample or specimen (either urine or breath, as the case may be) will constitute a positive test result. Any inability of the employee to provide an appropriate sample or specimen due to valid medical reasons shall be handled pursuant to the applicable provisions of 49 CFR Part 40.

5.0 Specimen Collection and Chain of Possession Procedures

5.1 The Company reserves the right to take any person who has been identified for testing/screening to an approved laboratory or medical facility where all specimens will be taken. In the alternative, specimens may be collected on site by an individual who is a qualified collector under 49 CFR Part 40.

5.2 The specimen collection and chain of possession procedures of the approved laboratory or medical facility, and those applicable to a qualified collector, shall be followed in all cases.

5.3 All employees requested to be tested under this policy will be required to sign a written consent to the drug and alcohol test and release of information form.

5.4 The Company may take disciplinary action based upon properly obtained laboratory results. Laboratory certification shall be in writing.

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5.5 Any employee who submits or attempts to submit a urine specimen other than his or her own specimen, or who in any way alters or tampers with a urine specimen, or who in any obstructs the testing process, shall be treated as having a positive test result.

LOGISTEC EVERGLADES LLC
SUBSTANCE ABUSE POLICY

ATTACHMENT A

SUBSTANCE	DETECTION LIMIT
Opiates	2000 ng/ml
Cocaine (Benzoylecgonione)	300 ng/ml
Amphetamines	1000 ng/ml
Cannabinoids (THC Metabolites)	50 ng/ml
Phencyclidine (PCP)	25 ng/ml
Methadone	300 ng/ml
Benzodiazepines	300 ng/ml
Barbituates	300 ng/ml
Methaqualone	300 ng/ml
Propoxyphene	300 ng/ml
Ethanol (Alcohol) – breath or blood test	0.04% w/vol

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SECTION P

Logistec Everglades LLC

New Hire Introduction

Introduction

Welcome to Logistec. You are working for one of the nation's premier marine terminal and stevedoring companies, with an international reputation for excellence.

This orientation will provide information that you will need as you begin your Logistec employment, including key Logistec safety policies.

Our goal for orientation is to provide you with important safety and training information as well as key resources. You are encouraged to take time to thoroughly review the information provided as a part of your induction into your new role.

Requirements

1. All new hires for Logistec will have to be given new hire training by a management member or designee for that.
2. Training will have to be completed before the new hire can begin his/her job duties
3. The trainee will be responsible for ensuring the new hire comprehends, understands, and has the ability to perform safety functions as described in the training packet
4. In order to ensure full compliance with the OSHA training requirements, all training documents contained within the training packet will have to be completed before the new hire can begin work for Logistec.
5. All evaluation training and certification will be documented and kept on file

Please let Management know if you have any questions or concerns ...

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Logistec Everglades LLC

NEW HIRE SAFETY ORIENTATION

As an employee for Logistec, you have received information on Logistec's policies regarding Safety and Training. Specifically, Logistec has provided you training on the indicated programs listed below (please initial):

_____ Safety Policy
_____ Safe Practices and Standards of Conduct
_____ 3 point Rule
_____ First Aid / Blood borne
_____ Carbon Monoxide
_____ Confined Space
_____ Electrical
_____ Electronic Devices
_____ Emergency Response/Action Plan
_____ Ergonomics
_____ Eyewash Station
_____ Fall Protection
_____ Fire Prevention
_____ Fire Extinguisher
_____ Hazard Communication
_____ Heat Stress
_____ Hot Works / Welding
_____ Incident Investigation
_____ Ladder program
_____ Line Handling
_____ Lockout / Tagout
_____ Machine Guarding
_____ Man Overboard
_____ Mobile Equipment
_____ Noise Conservation
_____ OSHA Managing
_____ Pedestrian
_____ Personal Protective
_____ Powered Industrial Truck
_____ Railroad Safety
_____ Respiratory Protection
_____ Responsibility and Accountability
_____ Rigging
_____ Safe Lifting
_____ Safety Committee
_____ Seat Belt Policy
_____ Signal Man
_____ Slips Trips and Falls
_____ Smoking policy
_____ Spill Prevention
_____ Strain Injury
_____ Supervising for Safety
_____ Utility Cart
_____ Vessel Crane Operator
_____ Housekeeping

The purpose for providing these safety materials is to assist you in your responsibility in understanding our safety program and safe work practices. It is your responsibility to ensure you follow all safety requirements and procedures set forth by Logistec.

My signature below indicates I have received the indicated information and fully understand all instructions and / or materials given me in their entirety and had opportunity to ask questions. I am aware that it is my responsibility to work safely at all times while in the employ of Logistec USA Inc.

_____New Hire Signature

_____Date of New Hire Training

_____Management Trainer

EXHIBIT 4

SECTION P (5)

Apart from the certificates that are provided herewith, it is important to note that for the union employees, the employers association and the local have the documentation for all their employees.

EXHIBIT 4
Page 99 of 108

Barloworld
Handling

Certificate of Satisfactory Completion

Fundamental Powered Industrial Truck Operator Training

Having attended and demonstrated through attainment of a passing end of course examination score

Ricardo Headley

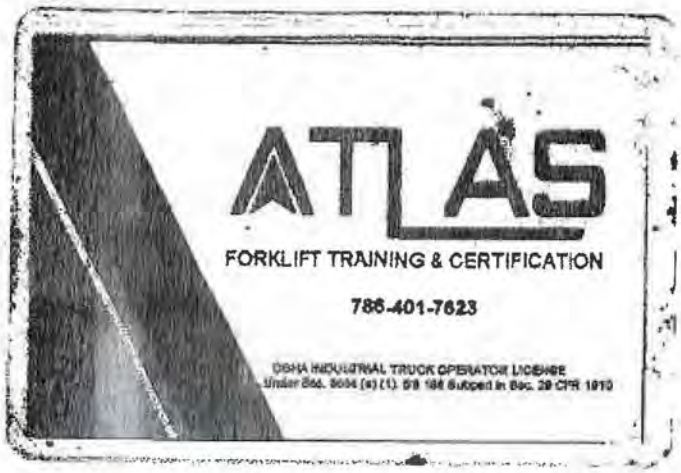
is certified to have satisfactorily completed this course.

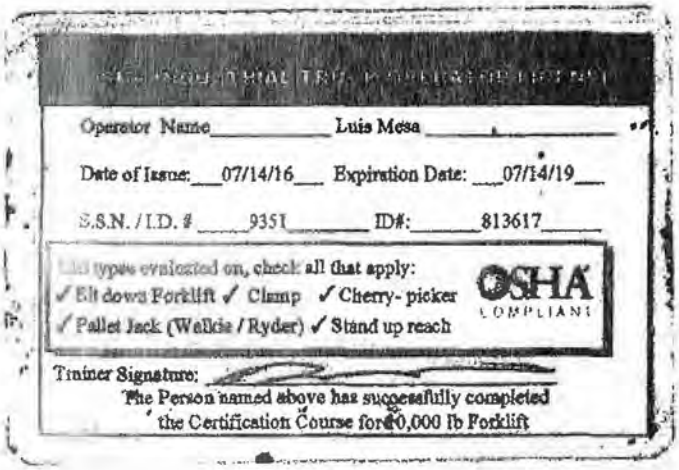
Attested to ***On This Date***

L Kleer — 8/09/07

Trainer

An outline of the material contained in this course is on the reverse side.*


ATLAS
FORKLIFT TRAINING & CERTIFICATION
786-401-7623
OSHA INDUSTRIAL TRUCK OPERATOR LICENSE


Operator Name Luis Mesa
Date of Issue: 07/14/16 Expiration Date: 07/14/19
S.S.N. / I.D. # 9351 ID#: 813617
✓ Sit down Forklift ✓ Clamp ✓ Cherry- picker
✓ Pallet Jack (Walkie / Ryder) ✓ Stand up reach
OSHA
COMPLIANT
Trainer Signature:
The Person named above has successfully completed
the Certification Course for 0,000 lb Forklift

U.S. Department of Homeland Security
United States Coast Guard

Commandant
United States Coast Guard

2703 Martin Luther King Jr., Ave., SE
Stop 7501
Washington, DC 20593-7501
Staff Symbol: CG-INV-3
Phone: (202) 372-1283
Fax: (202) 372-8366
Email: Ternia.r.Pipkins@uscg.mil

5720
FOIA 2019-CGFO-00477
December 12, 2018

Ms. Addy Eiras
Port Everglades Department
1850 Eller Dr., Suite 603
Ft. Lauderdale, FL 33316-4201

Dear Ms. Eiras:

This letter is in response to your Freedom of Information Act (FOIA) request of November 27, 2018, for any environmental infractions, fines, penalties, and resolutions associated with Logistec Everglades, LLC from January 1, 2017 to present. This office received your request on November 28, 2018.

A search of the Marine Information for Safety and Law Enforcement (MISLE) database found no records responsive to your request. The search looked for any environmental infractions, fines, penalties, and resolutions associated with Logistec Everglades, LLC from January 1, 2017 to present. The search was conducted on keywords: Logistec Everglades, LLC from January 1, 2017 to present. This records search was conducted December 11, 2018 by Ms. Ternia Pipkins, IT Specialist, of Commandant (CG-INV-3). We conducted a reasonable search for records responsive to your request and conclude there are no responsive records.

This is not a denial. You may appeal the adequacy of our search. Your appeal must be made in writing and you must submit it within 60 days from the date of receipt of this letter. Your letter should indicate that you are making an appeal based on a "no records" determination of a request made under the Freedom of Information Act and the envelope should be prominently marked "FOIA Appeal." Include in your appeal the reason(s) why you believe the search was inadequate and a copy of this letter. Send your appeal to:

Commandant (CG-611)
U.S. Coast Guard
Attn: FOIA/PA Officer
2703 Martin Luther King Jr. Ave., SE, STOP 7710
Washington, DC 20593-7710

If you have any questions concerning this matter, please contact this office at 202-372-1283 and refer to FOIA NUMBER 2019- CGFO-00477.

Sincerely,

D. Patterson

D. PATTERSON
Chief, Data Administration Division
U.S. Coast Guard
By direction

ENVIROS

Facilities Advanced Search

Search | Reset

No information was found matching your selection criteria. Please try again.

EPD Site Number:

Facility Name: Logistec Everglades LLC

House Number: To:

Street: (All) (All)

Direction Street Name Street Type Suite

City: (All) Zip: (All)

Operator Name:

Storage Tank Facility Type: (All)

Waste Facility Type: (All)

Enter Latitude and Longitude in Deg-Min-Sec format.

Facility Latitude:

Facility Longitude:

DEP Site Number:

State AIRS ID Number:

Search By Section Township Range

Florida Department of Environmental Protection

Hazardous Waste Facilities Search Results

Selection Criteria for This Handler Search:
EPAID: % ; **Name:** LOGISTEC ENVIRONMENTAL LLC% ; **Address:** % ; **City:** % ; **County:** %

For Facility Data Links:
Activities -- provides a list of RCRA compliance activities and violations.

Mapping in GIS -- this opens a |NEW IMPROVED| GIS mapping tool focused on the facility.
Documents -- this provides a list of electronic documents available online.
Error Reporting -- send us feedback to address data errors.
County Verification -- County or RPC verification of Facility and Waste for this site.

For a Generator Status History:
click on the **Status.** - NNOT indicates a facility is a Non-Notifier and may not have been issued the associated EPAID - **Check with DEP before using that EPAID!**

Legend of Status Types

EPA ID	Name	County	Address	Contact	Status	As of	Data Links

Search has retrieved 0 Facilities

Legend of Status Types:
LQG - Large Quantity Generator
SQG - Small Quantity Generator
CES - Conditionally Exempt Small Quantity Generator
UOT - Used Oil Transporter
TRA - Hazardous Waste Transporter
TSD - Treatment/Storage/Disposal Facility
CLO - Closed
NHR - Non-Handler of Hazardous Waste

UNITED STATES
DEPARTMENT OF LABOR

OSHA English | Spanish

Find it in OSHA

A TO Z INDEX

ABOUT OSHA · WORKERS · EMPLOYERS · REGULATIONS · ENFORCEMENT · TOPICS · NEWS & PUBLICATIONS · DATA · TRAINING

Establishment Search

Reflects inspection data through 11/27/2018

This page enables the user to search for OSHA enforcement inspections by the name of the establishment. Information may also be obtained for a specified inspection or inspections within a specified SIC.

Note: Please read important information below regarding interpreting search results before using.

Search By:

Your search did not return any results.

Establishment: Logistec Everglades LLC%

(This box can also be used to search for a State Activity Number for the following states: NC, SC, KY, IN, OR and WA)

State: All States | Fed & State

OSHA Office: All Offices

Site Zip Code: 33316

Case Status: (•) All ( ) Closed ( ) Open

Violation Status: (•) All ( ) With Violations ( ) Without Violations

Inspection Date

Start Date: January | 1 | 2013

End Date: November | 20 | 2017

Submit Reset

Can't find it?

Wildcard use %
Basic Establishment Search Instructions
Advanced Search Syntax

NOTE TO USERS

The Integrated Management Information System (IMIS) was designed as an information resource for in-house use by OSHA staff and management, and by state agencies which carry out federally-approved OSHA programs. Access to this OSHA work product is being afforded via the Internet for the use of members of the public who wish to track OSHA interventions at particular work sites or to perform statistical analyses of OSHA enforcement activity. It is critical that users of the data understand several aspects of the system in order to accurately use the information.

The source of the information in the IMIS is the local federal or state office in the geographical area where the activity occurred. Information is entered as events occur in the course of agency activities. Until cases are closed, IMIS entries concerning specific OSHA inspections are subject to continuing review and updating, particularly with regard to citation items, which are subject to modification by amended citations, settlement agreements, or as a result of contest proceedings. THE USER SHOULD ALSO BE AWARE THAT DIFFERENT COMPANIES MAY HAVE SIMILAR NAMES AND CLOSE ATTENTION TO THE ADDRESS MAY BE NECESSARY TO AVOID MISINTERPRETATION.

The Integrated Management Information System (IMIS) is designed and administered as a management tool for OSHA to help it direct its resources. When IMIS is put to new or different uses, the data should be verified by reference to the case file and confirmed by the appropriate federal or state office. Employers or employees who believe a particular IMIS entry to be inaccurate, incomplete or out-of-date are encouraged to contact the OSHA field office or state plan agency which originated the entry.

DERM

5 yrs.
1/01/13 – 11/29/18

Search

Full-Text Search | Search

Search returned 0 results

No Results

Attribute Search

Facility Name

Logistec Everglades LLC

Case Number

Folio (Exclude Dashes)

More Fields

Search | Reset

EXHIBIT 4

SECTION Q (4)

Aware of the growing importance of environmental aspects in business, we are committed to taking into account the possible repercussions on the environment of all its current and future decisions and operations. In order to attain this objective, while ensuring that it remains competitive in its field, Logistec Everglades subscribes to the following principles:

- To meet or exceed current environmental laws and regulations in the conduct of all our operations;
- To reduce our possible impacts on the environment by adopting protective and preventive measures;
- To promote the installation and use of new technologies that consume less energy and are more environmentally friendly;
- To adopt and apply an Environmental Management Program aimed at continuous improvement, as measured through the monitoring of the environmental impact of our activities;
- To implement and maintain Emergency Preparedness Plans designed to allow an immediate response to incidents and situations that may have an impact on the environment;
- To implement an Environmental Training Program to inform employees of existing environmental laws and regulations, to communicate to them the corporate Environmental Policy and to make them aware of the importance of their participation in attaining the environmental protection objectives;
- To regularly communicate the environmental performance results of our operations to the Board of Directors; and
- We are also committed to reviewing our Policy periodically and revising it in light of new information regarding the types and locations of our activities.

EXHIBIT 4

SECTION R

One of the key elements of the business agreement between Coleary Transport Co., Inc. ("CTC") and Logistec USA Inc. is that the Logistec Everglades LLC will benefit from the work of the Sales, Marketing and Business Development entire team of the Logistec Group.

This will allow Logistec Everglades LLC to benefit from growth opportunities apart from the obvious consolidation of the present business activities of CTC within Logistec Everglades LLC.