

HSE MANUAL FOR

Specialized Storage Systems, Inc

ASSIGNMENT OF RESPONSIBILITIES

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

David Cali

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

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

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



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RESPONSIBILITIES

David Cali is the designated Company Safety Coordinator.

POLICY

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

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

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

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

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

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

Our safety and health program includes:

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

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

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

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

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

Program Goals

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

Responsibility: Having to answer for activities and results

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

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

Benefits of achieving our goals are:

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

Management Commitment

Specialized Storage Systems, Inc is committed to building an effective injury and illness prevention plan, putting it in writing, and integrating it into the entire operation.

The management of Specialized Storage Systems, Inc is committed this safety policy, and to provide direction and motivation by:

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

Labor and Management Accountability

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

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

Assignment of Responsibility

The Safety Coordinator(s) and/or Safety Committee Members Specialized Storage Systems, Inc has designated:

Safety Coordinator	David Cali
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/Vice-chair	

Their cell phone and office phone numbers are:

Safety Person's Name	Office Phone #	Cell Phone #

David Cali will assist managers in initiating, educating, and executing the safety program with:

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

Employee Involvement

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

Communication System:

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

Hazard Identification and Control

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

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

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

Accident/Incident Investigation

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

Worker Training

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

Our plan includes training and instruction:

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

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

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

Program Evaluation

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

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

Supervisor/Foreman

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

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

Employees

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

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

MEDICAL FACILITIES

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

POSTING REQUIREMENTS

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

HSE SUPERVISOR

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

EVALUATING SAFETY PROGRAM PERFORMANCE

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

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

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

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

CODE OF CONDUCT

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

Specialized Storage Systems, Inc employees will not:

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

Reporting Violations

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

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

Communication

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

Disciplinary Actions

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

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

Commitment

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

Owner Name

Owner Signature

Date

POLICY

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

RESPONSIBILITIES

Specialized Storage Systems, Inc Safety Committee members are:

As designated

The Safety Committee will meet a minimum of four times per year.

Committee Goal

Our Company will strive to meet the following goals:

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

Mission Statement

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

Company Commitment

Specialized Storage Systems, Inc is committed to excelling at safety, and will support the safety committee's purpose and recommendations.

Communication of Safety Matters

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

Purpose

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

Organization

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

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

Extent of Authority

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

Functions

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

Recommendations

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

Procedures

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

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

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

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

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

Specialized Storage Systems, Inc has designated:

Safety Coordinator	David Cali
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/Vice-chair	

Their cell phone and office phone numbers are:

Safety Person's Name	Office Phone #	Cell Phone #

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

PROCEDURES

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

Understand a Safety Committee's Seven Essential Activities

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

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

Commitment

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

Accountability

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

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

Employee Involvement

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

Ways the safety committee can encourage employees to get involved:

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

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

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

Hazard Identification

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

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

Accident Investigation

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

Recordkeeping

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

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

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

Evaluation

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

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

POLICY

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

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

THE COMPANY SAFETY AND HEALTH PROGRAM INCLUDES:

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

RESPONSIBILITIES

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

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

GENERAL SAFETY RULES

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

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

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

ENFORCEMENT OF SAFETY POLICIES

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

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

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

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

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

Training Programs

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

Retraining

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

SAFETY INCENTIVE PROGRAMS

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

DISCIPLINARY ACTION

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

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

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

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

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

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

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

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

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

POLICY

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

RESPONSIBILITIES

Accident investigation and reporting is a responsibility shared between the Company and its employees. David Cali is responsible for establishing the Incident Investigation and Reporting policy before there is an incident.

Employer Responsibilities

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

Safety Committee Responsibilities

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

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

Employee Responsibilities

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

TRAINING

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

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

PROCEDURES

Specialized Storage Systems, Inc will investigate all lost-time injuries. Fatalities and catastrophes must be reported to OSHA within 8 hours. Serious accidents must be reported to OSHA within 24 hours. OSHA requires reporting of work related incidents resulting in the death of an employee or the hospitalization of one or more employees. Owner clients require all incidents to be reported including, but not limited to, injuries, spills, property damage, fires, explosions, and vehicle damage.

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

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

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

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

Specialized Storage Systems, Inc will report severe injuries and/or fatalities using one of the following methods:

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

On site first response

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

Prevent further loss

After an immediate rescue, Specialized Storage Systems, Inc will take actions to prevent further loss. For example:

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

Secure the Accident/Incident Scene

For a serious accident, the first action the accident team needs to take is to secure the accident scene so material evidence is not moved or removed. Material evidence has a tendency to walk off after an accident. If the accident is quite serious, OSHA may inspect and require that all material evidence be marked and remain at the scene of the accident

Reporting Requirements

Local reporting sequence of events

Injuries

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

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

Involving the Environment

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

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

Time elements of when incident should be reported

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

Reportable Incidents

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

ACCIDENT/INCIDENT CAUSES

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

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

WHEN ACCIDENT/INCIDENT INVESTIGATIONS ARE REQUIRED

As a rule, investigations should be conducted for:

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

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

Accident/Incident Investigation Plan

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

The plan should include procedures that determine:

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

GATHER INFORMATION

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

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

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

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

Document the scene with photographs, videotape, or sketches AND appropriate measurements.

Evidence

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

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

Develop a Sequence of Events

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

Analyze the Accident/Incident

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

SURFACE CAUSES

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

Hazardous conditions may exist in any of the following categories:

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

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

Some example of unsafe employee/manager behaviors include:

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

ROOT CAUSES

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

System design weaknesses

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

System implementation weaknesses

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

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

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

Corrective Actions

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

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

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

Written Incident report

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

Documentation and Communications of lessons learned

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

SUMMARY

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

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

EMPLOYEE INCIDENT REPORT

Work site: _____

Manager/Supervisor: _____

Employee name: _____ Date: _____

Job title: _____

Incident:

Action taken:

CODE OF CONDUCT:

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

Employee Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Accident / Incident Report

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

POLICY

Specialized Storage Systems, Inc has adopted this Behavior-based Safety Program for the safety of our employees and help prevent occupational injuries and illness.

The elements of our program consist of:

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

OBSERVATION

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

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

Observation Process Training

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

Elements of the Training Program include:

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

The types of training that will be provided are:

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

This training will include:

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

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

FEEDBACK

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

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

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

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

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

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

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

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

DATA COLLECTION

At the end of the observation, the Observer will:

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

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

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

ELEMENTS OF THE ACTION PLAN

In order to address unsafe behaviors Specialized Storage Systems, Inc will construct its Action Plan based on Observation Reports, trend analysis and recommendations from the Observers and employees. David Cali is responsible for the procedures of the Action Plan.

Action planning will include:

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

The committee will:

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

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

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

FOLLOW-UP

Any Action Plans set out by Specialized Storage Systems, Inc at the direction of David Cali will be completed in a time frame agreed upon by the entire committee.

Regularly scheduled meetings will be held to:

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

Behavior-Based Safety Program Employee Training Form

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

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

Employee Signature: _____

Date: _____

BBS Training Form

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

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

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

Signature: _____ Date: _____

Observation Form

Observer Name:	Date:
----------------	-------

Job being observed:

Job Step	Procedure Comments
----------	--------------------

	Positive Behaviors:	At-risk Behaviors
1		

Recommendations:

	Positive Behaviors:	At-risk Behaviors
2		

Recommendations:

	Positive Behaviors:	At-risk Behaviors
3		

Recommendations:

	Positive Behaviors:	At-risk Behaviors
4		

Recommendations:

Employee Comments:

Observer's Signature _____ Date: _____

POLICY

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

RESPONSIBILITIES

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

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

DEFINITION

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

WORK CREW ASSIGNMENTS AND RESTRICTIONS

- A SSE may not work alone
- When crew/group sizes of less than five (5) are assembled, no more than one (1) SSE per group/crew is allowed
- When working with crew/group sizes larger than five (5) members, the SSE's will not exceed 20% of the crew/group make up. When the crew/groups exceed the twenty percent (20%) make up of SSE's, this will only be permitted with a written variance form, which will serve as the mitigation plan; approved by the Supervisor and/or Manager in charge of the project.

COMMUNICATION AND NOTIFICATION

The following procedure will be followed to ensure the host facility knows when a SSE is working at their site. The processes for the proposed crew/group, when using an SSE, are outlined in the Short Service Employee Form. Prior to beginning the job assignment the Supervisor/Manager in charge will submit to the projects coordinator, on-site supervisor, or contractor; the completed SSE form for all the jobs that will contain SSE personnel. The work owner or supervisor/person in charge will decide SSE approval status and will keep the original completed form in the project files.

IDENTIFICATION

All SSE personnel will be visibly identified. This will be done by employing one of the following methods:

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

MONITORING SSE

The supervisor will monitor their employees, which includes the SSE personnel for Health, Environment and Safety (HES) awareness.

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

- Worked safely
- Adhered to all HES policies
- Had no recordable incidents attributed to him/her

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

MENTORING PROCESS

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

The mentor must meet the following requirements:

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

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

SUBCONTRACTOR MANAGEMENT

Subcontractors working on site will have assigned mentors that monitor their employees only. Mentoring of outside employees will be done on an individual basis, and as required. They will also be managed following this policy.

HIGH HAZARD AREAS

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

- Naturally occurring radioactive material (NORM)
- H₂S areas
- Confined spaces
- High Voltage environments, etc

PROCEDURES

Specialized Storage Systems, Inc has set forth these procedures to verify all work is being carried out under the guidelines of this chapter by having:

- The supervisors communicate the SSE policy and procedure at all pre-job meetings
- The supervisor submits the crew/group makeup and all SSE form(s) to the on-site representative of the work owner for approval
- The supervisor will have the on-site representative validate the crew/group makeup and experience level
- The supervisor will see that the on-site representative approves the SSE variance form
- The supervisor will make sure the on-site representative posts the forms to the appropriate database, if required

PROGRAM REVIEW

Specialized Storage Systems, Inc's Short Service Employee Program will ensure the following practices are kept up to date on a regular basis when using and working with SSE's:

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

CONTRACTOR SHORT-SERVICE EMPLOYEE FORM & VARIANCE

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

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

CONTRACTOR SHORT-SERVICE EMPLOYEE FORM & VARIANCE PAGE 2

II. SSE Crew Composition Requirements	
Choose one of the crew types below. If any of the stated limitations are exceeded, proceed to the variance form on next page.	
<input type="checkbox"/> Single person crew-cannot be an SSE (Variance Required)	
<input type="checkbox"/> 2-4 person crew-no more than one SSE	
<input type="checkbox"/> 5 or more person crew-no more than 20% SSE(s) per crew	
<input type="checkbox"/> Exceeding 20% SSE per crew (Variance Required)	
III. SSE Review and Approval	
<input type="checkbox"/> Contractor Supervising Manager:	Date:
<input type="checkbox"/> Work Location Supervisor:	Date:
<input type="checkbox"/> Work Owner:	Date:
IV. Contractor SSE Form Repository	
<input type="checkbox"/> Data Base:	Date:
<input type="checkbox"/> Work location	Date:
<input type="checkbox"/> Work Owner file:	Date:

CONTRACTOR SHORT-SERVICE EMPLOYEE FORM & VARIANCE PAGE 3

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

IV. Variance Information	
Variance Justification (What are the current circumstances and what will be done to ensure an acceptable level of risk?)	
Alternatives to Variance (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)	

List the steps to be taken to manage/mitigate the SSE risk to an acceptable level:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

V. Variance Review and Approvals

Variance Expiration Date: _____

Contractor Manager/Supervisor

Approves Denies

Signed: _____ Date: _____

Work Owner's Onsite Representative

Approves Denies

Signed: _____ Date: _____

Note: For large jobs, please use a separate sheet to list all SSEs on the crew by name and job title.

POLICY

Specialized Storage Systems, Inc has adopted this program for employee safety on or around “Vehicle Mounted Elevating and Rotating Work Platforms” also known as Elevating Work Platforms (EWP).

REFERENCES

- §1910.67 – Vehicle-Mounted Elevating and Rotating Work Platforms
- §1926.453 – Aerial Lifts
- §1926.952 – Aerial Devices Working Near Energized Lines or Equipment

RESPONSIBILITIES

Specialized Storage Systems, Inc has implemented and enforces these work practices and procedures to assure that no employee will be exposed to hazards during aerial lifting operations.

David Cali is designated by Specialized Storage Systems, Inc as the Competent Person in authority over all aerial device work procedures. David Cali will ensure that all safety measures and systems are in place and correctly installed, all safety procedures are adhered to, and ensure regular inspections of the operational site and aerial equipment are made. Only authorized personnel are permitted to operate an aerial lift.

Responsibilities during Elevating Work Platform Operations

Because elevating work platforms are often rented from an equipment supplier, there is confusion as to the responsibilities of the parties involved.

The owner or supplier must ensure that the machine:

- Is maintained in good operating condition
- Conforms to appropriate regulations and standards
- Includes the operator’s manual and correct load rating charts

Specialized Storage Systems, Inc and supervisors on the project must:

- Ensure that the operator is trained and competent to operate his equipment
- Ensure that the machine has the correct load rating capacity for the job
- Maintain the equipment and all its protective devices
- Maintain a daily inspection log for each platform
- Ensure that workers use appropriate personal protective equipment
- Keep the manufacturer’s operating manual with the equipment
- Train workers on each type of equipment that they will be using
- Use watchmen or cones to direct traffic(away from the equipment when in use)

The operators and workers using the equipment must:

- Receive adequate training to be fully competent
- Only operate the machine when competent
- Operate the machine in a safe manner as prescribed by the manufacturer and according to Company safety and health policies
- Inspect the equipment each day or each shift before use
- Perform function tests before use
- Report any defects to the supervisor
- Read, understand, and obey the manufacturer's safety rules, including the operating manual and warning decals. When a defect is reported to the supervisor, the equipment must be taken out of service until the repairs are completed and the equipment is inspected and approved for use

TRAINING

David Cali will verify that all employees are trained in and familiar with required work practices and procedures in the use of any equipment required, proper Personal Protective Equipment (PPE), and safety procedures which must be followed to safeguard personnel involved in aerial lifting operations or who work in the vicinity of aerial lifting operations.

DEFINITIONS

Aerial Device or Aerial Work Platform – means any vehicle-mounted device, telescoping or articulating or both, that is designed and manufactured to raise personnel to an elevated work position on a platform supported by scissors, masts, or booms.

Aerial Ladder – means an aerial device that consists of a single- or multiple-section rung ladder.

Articulating Boom Platform – means an aerial device that has two or more hinged boom sections.

Authorized Person – means a person who is approved and assigned to perform specific types of duties by the employer and who is qualified to perform those duties because of his or her training or experience.

Boom – An elevating member, the lower end of which is so attached to a rotating or non-rotating base that permits elevation of the free or outer end in vertical plane.

Commercial Chassis – means a vehicle that is built for over-the-road (roadway) travel.

Elevating Work Platform – A device designed to elevate a platform in a substantially vertical axis (Vertical Tower, Scissor Lift).

Insulated Aerial Device – means an aerial work platform that is designed with dielectric components to meet specific electrical insulating ratings for work on or near energized lines and apparatus.

Platform – means the portion of an aerial work platform, such as a bucket, basket, stand, cage, or the equivalent, that is designed to be occupied by personnel and is a component of an aerial device.

Qualified Person – means a person who possesses a recognized degree, certificate, professional standing, or skill and who, by knowledge, training, and experience, has demonstrated the ability to deal with problems relating to the subject matter, the work, or the project.

Qualified Line Clearance Tree Trimmer – means an employee trained to work in proximity of energized power transmission and distribution lines. An employee in a training program is included in this definition.

SAFE PRACTICES

- Aerial lifts must be designed and constructed in conformance with the applicable requirements of the American National Standards for "Vehicle Mounted Elevating and Rotating Work Platforms", ANSI A92.2.
- Each work platform will be inspected, maintained, repaired, and kept in proper working order in accordance with the manufacturer's maintenance and repair manuals

On a daily basis, before the work platform is used, it must be given a thorough inspection, which will include:

- Inspection for defects such as cracked welds, hydraulic leaks, damaged control cable, loose wire connections, and tire damage
- Inspection of functional controls for proper operation
- Lift controls will be tested each day prior to use to determine that such controls are in safe working condition
- Tests will be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition
- Critical safety components of mechanical elevating and rotating equipment whose failure would result in a free fall or free rotation of the boom will receive a thorough visual inspection before use on each shift
- Vehicles will have a reverse signal alarm audible above the surrounding noise level or the vehicle will be backed up only when an observer signals that it is safe to do so
- For power lines rated 50 kV. or below, minimum clearance between the lines and any part of the crane or load will be 10 feet
- Any suspect items discovered through inspection must be carefully examined and a determination made by a qualified service person as to whether they constitute a safety hazard. All unsafe items must be corrected before further use of the work platform
- Any work platform not in safe operating condition will be removed from service until it is repaired. All repairs will be made by a qualified service person in conformance with the manufacturer's operating, maintenance, and repair manuals
- Aerial lifts may be "field modified" for uses other than those intended by the manufacturer provided the modification has been certified in writing by the manufacturer or by any equivalent entity
- Manufacturer's boom, basket, and platform load limits will not be exceeded
- Each work platform will be equipped with a mechanical parking brake, which will hold the unit on any slope it is capable of climbing. When possible, wheel chocks will be installed before using an aerial lift on an incline
- Employees will always stand firmly on the floor of the basket, and will not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.

- Approved fall protection will be worn and a lanyard attached to the boom or basket when working from an aerial lift.
- No aerial vehicular equipment having an obstructed view to the rear may be operated on off-highway jobsites where any employee is exposed to the hazards created by the moving the vehicle, unless the vehicle has a reverse signal alarm audible above the surrounding noise level or the vehicle is backed up only when a designated employee signals that it is safe to do so
- Aerial vehicular equipment provided with outriggers will be operated with the outriggers extended and firmly set as necessary for the stability of the specific configuration of the equipment. Outriggers may not be extended or retracted outside of clear view of the operator unless all employees are outside the range of possible equipment motion
- When the work area or the terrain prevents the use of outriggers, the equipment may be operated only within its maximum load ratings for the particular configuration of the equipment without outriggers
- Mechanical elevating and rotating equipment used to lift or move material will be used within its maximum load rating and other design limitations for the conditions under which the work is being performed
- A designated employee other than the equipment operator will observe the approach distance to exposed lines and equipment and give timely warnings before the minimum approach distance is reached

The following clearances will be maintained when operating aerial work platforms or other equipment under, over, by, or near energized electric power lines:

Before using the work platform, the operator will:

- Read and understand the manufacturer's operating instructions and safety rules, and be trained on them by a qualified person
- Read and understand all decals, warnings, and instructions on the work platform
- Before the work platform is used, the operator will survey the area for hazards such as: untamped earth fills; ditches; drop-offs or holes; bumps and floor obstructions; debris; overhead obstructions and high voltage conductors; other possible hazardous conditions

Before each elevation of the work platform, the operator will:

- Check for overhead obstructions and high-voltage conductors. A minimum distance of ten feet from energized high-voltage conductors must be maintained at all times between the conductors and the operator and platform equipment
- Ensure that the load and its distribution on the platform are in accordance with the manufacturer's rated capacity. The manufacturer's recommended load limits must never be exceeded
- Ensure outriggers and stabilizers are used according manufacturer's instructions
- Ensure that guardrails are properly installed and gates are closed

Before and during driving while the platform is elevated, the operator will:

- Be required to look in the direction of, and keep a clear view of, the path of travel and assure that the path of travel is firm and level
- Maintain a safe distance from obstacles, debris, drop-offs, holes, depressions, ramps, or other hazards to safe elevated travel
- Maintain a safe distance from overhead obstacles

- The operator will limit travel speed according to conditions. Conditions to be observed are: Ground surface, congestion, slope, location of personnel, and other factors that may create a hazard of collision or injury to personnel
- Personnel will maintain a firm footing on the platform while working thereon unless they are secured by safety harness and lanyard devices fixed to manufacturer-approved anchor points. Use of railings or planks, ladders or any other device on the work platform for achieving additional height is prohibited
- The operator will immediately report defects or malfunctions which become evident during operation and must stop use of the work platform until correction has been made
- Altering or disabling of safety devices or interlocks is prohibited
- Stunt driving and horseplay is prohibited
- An aerial device that does not meet the requirements will not be used unless it has been inspected and modified as required to conform to the essential stability, structural, electrical insulation, and operational requirements of ANSI A92.2

Each aerial device placed in service will have a conspicuously displayed legible plate or other legible marking verifying the aerial device is designed and manufactured in accordance with the following applicable specifications:

- ANSI Standard A92.2, "Vehicle-Mounted Elevating Work Platforms", which applies to vehicle-mounted devices installed on commercial chassis and covers the following type of units:
 - Extensible boom aerial devices
 - Aerial ladders
 - Articulating boom aerial devices
 - Vertical towers
 - A combination of any of the equipment specified
- ANSI Standard A92.3, "Manually Propelled Elevating Work Platforms", which applies to work platforms which are manually propelled, which are vertically adjustable by manual or powered means, and which may be towed or manually moved horizontally on wheels or casters that are an integral part of the work platform base
- ANSI Standard A92.5, "Boom-Supported Elevating Work Platforms", which applies to all integral frame, boom-supported elevating work platforms which telescope, articulate, rotate, or extend beyond the base dimensions
- ANSI Standard A92.6, "Self-Propelled Elevating Work Platforms", which applies to self-propelled vertically adjustable integral chassis work platforms. Such work platforms are power operated with primary controls for all movement operated from the platform

The following information will be displayed on all work platforms in a clearly visible, accessible area and in as permanent a manner as possible:

- Warnings, cautions, or restrictions for safe operation in accordance with ANSI requirements
- The rated work load will be clearly displayed at each entrance to the platform

VEHICLE MOUNTED ELEVATING AND ROTATING WORK PLATFORMS

There are two basic types of elevating work platforms – boom and scissor. Both types come in:

1. “On-Slab” models for use on smooth hard surfaces such as concrete or pavement.
2. Rough-Terrain models used on firm level surfaces: graded and compacted soil or gravel.

Both types share three major components: base, lifting mechanism, and platform assembly.

SCISSOR-TYPE MACHINES

These are raised and lowered by hydraulic pistons and an expanding scissor mechanism. Platforms are available in various configurations with different capabilities for extension and movement. Some have extendable platforms or platforms that can rotate. Extendable platforms should be retracted before raising or lowering the device.

On-Slab Units

- Not designed for uneven or sloping ground
- Normally have solid rubber tires
- Generally powered by rechargeable DC battery
- Some are powered by internal combustion engine, either gasoline or propane
- Most have “pothole protection” – a metal plate lowered close to the ground to afford some protection against inadvertent movement into depressions or debris

Rough-Terrain Units

- Similar in design to on-slab machines
- Built to handle rigorous off-slab challenges
- Normally have wider wheel bases, larger wheels, and pneumatic tires
- Some fitted with outriggers for extra stability
- Usually powered by internal combustion engines: gasoline, diesel, or propane
- DC Battery powered units are also available, but are not common
- Lifting mechanism is hydraulic

Scissor-lifts range in capacity from 500 to several thousand pounds. They are available with platform heights often reaching 50 feet or more. Scissor-lifts must be set up on stable, level ground, even with outriggers deployed. A slight imbalance or instability is amplified when the machine is raised.

Although fixed to the platform, the controls are moveable from one side of the platform to the other. This enables the operator to see the path of travel. The controls must be oriented correctly so that the operator does not inadvertently move the machine in the wrong direction. Many machines have color-coded directional arrows on the chassis to aid the operator in moving the machine.

SELF-PROPELLED BOOM-SUPPORTED PLATFORMS

- Normally fitted with rough-terrain undercarriages
- Some smaller on-slab units
- Platforms have lifting capacity of about 500 pounds or two workers
- Lack capacity of scissor-type machines; not intended for lifting materials
- Usually powered by an internal combustion engine: gasoline, diesel, or propane

Booms

- Telescopic, articulating, or combination of both
- Raised and extended by hydraulic cylinders
- Can reach up to 150 feet
- Can extend well beyond the wheelbase

As with mobile cranes, stability decreases with length of boom and boom angle as the center of gravity moves in relation to the platform position. The machine will overturn if the center of gravity moves outside the machine's base.

Machines come with load charts that show safe operating configurations. Machines with booms long enough to cause overturning at low boom angles are required to have radius-limiting interlocks to prevent operation in unstable configurations. The reach chart indicates the safe operating configurations for a machine operating on a level surface. The reach diagram shows the safe operating envelope. The machine does not achieve its maximum height directly overhead, nor does it achieve its maximum reach at ground level.

Users must be familiar with the operating range of the individual make and model of the equipment they are using. This knowledge is essential in order to position the machine correctly and reach the work location safely.

NON-SELF-PROPELLED OR PUSH-AROUNDS

These units are not self-propelled and must be transported from one location to another with an independent power source or manually in the case of the smaller devices. The machines are intended primarily for use on smooth, level, hard surfaces or on-slab conditions. Some trailer-mounted units are available. Some can fold up to pass through a standard door, and can be transported by pick-up truck. As a result, they are suitable for maintenance or renovation work.

PUSH-AROUNDS

- Raising mechanism normally powered by gasoline, propane or electric motors
- Normally raised and lowered by hydraulic cylinders
- Platform capacities vary from 300 to 1000 pounds or more
- Devices with capacity less than 500 pounds are Not Recommended for construction – this type is better suited to maintenance activities
- Platforms usually do not exceed 36 feet in height
- As platform is raised, risk of overturning increases
- Extra care required when operating at maximum height

EQUIPMENT SELECTION

Elevating work platforms are designed for different uses. It is essential to select the appropriate equipment for the job.

Typical Mistakes

- Using an on-slab machine on rough terrain
- Using a unit undersized with respect to height, reach, and lifting capacity
- Lifting large materials that overhang the platform
- Using a scissor lift where the reach of a boom-type machine is needed
- Extending the platform with planks, ladders, or other devices because the machine cannot reach the required height

Factors to Consider

- Capacity – Does the machine have the lifting capacity, the reach, and the height to complete the task?
- Surface Conditions – Are the surface conditions hard or soft, sloped or level? Will the ground have an effect on the type of machine selected?
- Platform Size and Configuration – Do you need a regular or extendable platform? Is rotation required? Are there space restrictions to consider?
- Mobility – Is a boom type better suited than a scissor lift to the task?
- Material to be Lifted – Will the machine be able to lift the size and weight of material required for the job?
- Access – Will the machine be able to travel around the workplace safely? Are there obstructions or depressions that will restrict the use of certain machines?
- Operator Skill or Training – Are the people on site competent to operate the machine? If a propane-powered engine is used, has the operator received propane training?
- Work Environment – If the work is to be done indoors, or in a poorly ventilated area, will an electrically powered machine be required?

FUNDAMENTAL ELEVATING WORK PLATFORM HAZARDS

- Machine Tipping or Overturning – Many factors cause instability – sudden stops, depressions, drop-offs, overreaching, overloading, etc. Overturning and tipping result in many fatalities and injuries
- Overriding Safety Features – Disarming features such as the tilt or level warning and the deadman switch can prevent operators from knowing they are in danger
- Overhead Power line Contact – Contacting overhead wires can cause electrocution
- Falls from Elevated Platforms – Many falls occur because workers get in a hurry and fail to observe standard fall protection procedures. Many such falls cause serious injury or even fatalities
- Makeshift Extensions – When the machine cannot reach the working height desired, do not compensate by using scaffold planks, ladders, blocks of wood, or other makeshift arrangements. Such practices lead to falls and machine instability
- Overloading the Platform – Elevating work platforms overloaded or loaded unevenly can become unstable and fail. Boom-type machines are especially sensitive to overloading. Always stay within the operating range specified by the manufacturer
- Failure to Cordon Off –
 - Elevating work platforms have been struck by other construction equipment or oncoming traffic when the work area is not properly marked or cordoned off
 - Workers have been injured when they inadvertently entered an unmarked area and were struck by falling material, tools, or debris
 - In unmarked areas, workers have also been injured by swinging booms and pinched by scissor mechanisms
- Accidental Contact – Many elevating work platforms have blind spots. Moving the machine or platform may cause contact with workers or with obstacles. Use a designated signaler on the ground to guide the operator when the path of travel is not clear or access is tight
- Improper Maintenance or Modifications – Elevating work platforms should be maintained by competent workers in accordance with manufacturer's instructions. No modifications should be made to the machine without the manufacturer's approval
- Improper Blocking During Maintenance – Failing to block, or improperly blocking the machine, boom, or platform can cause serious crushing injuries and property damage.
- Improper Access – Do not enter or leave the platform by climbing the scissors or the boom. Do not use extension ladders to gain access. Ladders exert lateral loads on the platform that can cause overturning. For the safest access, lower the machine completely
- Moving with the Platform Raised – Lower the platform before moving the machine unless: The machine is designed to move with the platform raised, or the supporting surface is smooth and level. Slight dips and drops are amplified when the platform is raised and can cause the machine to overturn
- Improper Refueling – Take care when refueling. Gasoline, for instance, should be kept in approved containers and dispensed to prevent spills and sparking
- Pinch Points – Clothing, fingers, and hands can get caught in scissor mechanisms. As platforms are raised, machines may sway. Workers can be pinched between guardrails and the structure. Position the platform so that work takes place above guardrail height

STABILITY AND TIPPING

In general, elevating work platforms are well manufactured and are safe to use within their specific limitations. However, as with any equipment or tool, there are do's and don'ts to follow.

One of the most dangerous hazards in operating elevating work platforms is tipping over. This can be caused by one or more of the following factors:

- Sudden movement of the unit or parts of the unit when elevated
- Making sudden stops while in motion with platform elevated
- Uneven or overloading of the platform
- Traveling or operating on a slope or uneven terrain
- Changing the weight distribution of the machine by replacing parts with others of a different weight or adding attachments not approved by the manufacturer
- Holes or drop-offs in the floor surface causing one wheel to drop suddenly
- Operating the equipment in windy conditions (refer to the operator's manual for safe operating conditions)

It is important that users understand what makes a platform stable and what causes it to overturn. To understand stability, one must understand the concept of center of gravity, tipping axis (or tipping point), and forces that shift the center of gravity.

Stability is resistance against tipping over. Stability depends on the location of the center of gravity in relation to the tipping axis.

CENTER OF GRAVITY

Every object has a center of gravity. It is the point where the object's weight would be evenly distributed or balanced. If a support were placed under that point, the object would be perfectly balanced.

The center of gravity is usually located where the mass is mostly concentrated. However, the location does not always remain the same.

Any action that changes the machine's configuration – such as raising the platform, extending the boom, or traveling on a slope – can change the location of the center of gravity.

Tipping Axis and Area of Stability

When an EWP turns over, it tips around an axis or point. This is called the tipping axis or tipping point. EWPs typically have four tipping axes – front, back, left, and right.

Each EWP has its own area of stability. This varies from platform to platform and from model to model. In most cases, the area of stability is bound by the four tipping axes (or the four tires or outriggers). The platform is stable as long as the center of gravity remains inside the area of stability. This is the key to safe operation.

When the center of gravity shifts beyond the area of stability, the machine will tip over. Some factors that can cause a shift beyond the stability area are overloading, moving on excessively sloped ground, a sudden drop of one wheel, and shock loading.

Raising the platform also raises the EWP's center of gravity. When a scissor lift is situated on a slope, and the platform is raised, the platform's center of gravity will move toward the tipping axis. If the center of gravity moves beyond the tipping axis, the platform will overturn.

Boom-supported aerial devices work in the same way. When the boom is extended outward, the center of gravity moves outwards towards the tipping axis. The aerial device will overturn if the boom is extended such that the center of gravity moves beyond the axis. Boom-type machines have an interlocking system that prevents the machine from moving into an unstable configuration.

FACTORS AFFECTING STABILITY

Dynamic Forces

Dynamic forces are forces generated by movement or change of movement. For example, applying the brakes suddenly or traveling too fast around corners can cause instability – as in a car or van. Sudden stops while raising or lowering the platform can also cause instability.

Traveling

Traveling the platform over rough or uneven ground can also cause instability. Lower the platform fully or retract telescoping sections while traveling, particularly on uneven surfaces.

EQUIPMENT INSPECTION

All components that bear directly on the safe operation of the EWP and can change from day to day must be inspected daily. Inspection is mostly visual – done in a quick but thorough manner.

Check the operator's manual for a complete list of pre-operational checks. See the end of this section for Daily Inspection Checklists for Elevating Work Platforms and Aerial Devices.

MINIMUM REQUIREMENTS

Before climbing onto the platform, check:

- Tires for proper pressure and wheels for loose or missing lug nuts
- Steer cylinder, linkage, and tie rods for loose or missing parts, damage, and leaks
- Hydraulic oil for leaks and fluid level. Hydraulic hoses, lift cylinder(s), and connections for leaks or loose connections
- Fuel supply – adequate fuel, filler cap in place, no damage, leaks, or spills
- Battery for fluid level and state of charge
- Proper connection of all quick-disconnect hoses
- Structural components for damage, broken parts, cracks in welds, including scissor arms, outrigger arms, and pads
- Ladder or steps for damage and debris (ladder must be firmly secured to the platform and relatively free of grease, mud, and dirt)
- Beacon and warning lights for missing and defective lenses or caps
- Ground controls (manual and powered) – including emergency stop switch and platform lower/lift switch – for proper function and damaged and missing control sticks/switches
- Decals and warning signs to make sure they are clean, legible, and conspicuous

After mounting the platform, check:

- Platform assembly for missing or loose parts, missing or loose lock pins and bolts
- Platform floor for structural damage, holes, or cracked welds and any dirt, grease, or oil
- Operator's manual to make sure it is in place
- Extendable platform deck for ease of extension/retraction and proper function of locking position of platform
- Guardrails to make sure they are in place and secure
- Access gate for ease of movement, missing parts, latch, and locking capabilities
- All fall protection anchorage points
- All control mechanisms for broken or missing parts
- All emergency controls for proper function – stopping, descending, master OFF switch
- All safety devices such as tilt and motion alarms for malfunction
- Swivels for freedom of rotation
- Scissors for smooth movement up and down
- Brakes for stopping capabilities
- Horn for proper function

MANUALS, SIGNS, AND DECALS

Signs clearly visible to the operator at the controls must indicate:

- The equipment's rated working load
- All limiting operating conditions, including the use of outriggers, stabilizers, and extendable axles
- The specific firm, level surface conditions required for use in elevated position
- Such warnings as may be specified by the manufacturer
- Other than for a boom-type elevating work platform, the direction of machine movement for each operating control
- The name/number of the ANSI standard to which the platform was designed
- The name and address of the owner

In addition to the above, ANSI standards require the following signs:

- The make, model, serial number, and manufacturer's name and address
- The maximum platform height
- The maximum travel height, if not equal to the maximum platform height
- The nominal voltage rating of the batteries, if battery-powered
- A warning to study the operating manual before using the equipment
- A statement as to whether or not the platform is insulated
- A notice outlining the required inspections
- The capacity in each configuration
- Diagrams/description of various configurations in which the platform can be used
- Warnings against replacing, without the manufacturer's consent, components critical to the machine's stability – for example, batteries or ballasted tires with lighter weight components (the minimum weights of such components must be specified)

Many of these signs are vital to the operation of the machine and the protection of workers. All signs and decals must be kept clear of dust and grease so they can be easily read. Torn or damaged signs must be replaced.

Standards require the manufacturer provide a manual that contains:

- Description, specifications, and capacities of the platform
- The operating pressure of the hydraulic or pneumatic system that is part of the work platform
- Instructions regarding operation and maintenance, including recommended daily, weekly, and monthly inspection checklists
- Information on replacement parts
- The manual must be stored on the equipment in a weatherproof storage container

SAFE PRACTICES

Operators must be familiar with the requirements for the specific machine they will use:

- The manufacturer's operating manual
- The manufacturer's warning and caution signs on the machine
- The location of all emergency controls and emergency procedures
- The daily maintenance checks to perform

General Safety Guidelines for EWPs and Aerial Devices

- Always check for overhead power lines before moving the machine or operating the platform. The limits of approach from overhead power lines must be observed. If work must be done within these limits, make arrangements with the owner of the utility to have the power line de-energized. Allow for movement or sway of the lines as well as the platform. Be aware of overhanging tools or equipment
- Wear a full body harness and tie off to a designated tie-off point while the machine is moving
- Do not leave the machine unattended without locking it or otherwise preventing unauthorized use
- Do not load the platform above its Rated Working Load (RWL). Wherever possible, keep the load below $\frac{2}{3}$ of the RWL
- Make sure that all controls are clearly labeled with action and direction
- Keep guardrails in good condition and ensure that gate is securely closed before moving the platform. Do not remove guardrails while the platform is raised
- Shut off power and insert the required blocking before maintenance or servicing
- Deploy stabilizers or outriggers according to the manufacturer's instructions
- Position the boom in the direction of travel where possible
- Keep ground personnel away from the machine and out from under platform
- Do not access the platform by walking on the boom
- Do not try to push or move the machine by telescoping the boom
- Do not use the machine as a ground for welding
- Do not use a boom-supported platform as a crane
- Do not operate the equipment in windy conditions. For safe wind speeds, refer to the operator's manual
- Do not place the boom or platform against any structure to steady either the platform or the structure
- Secure loads and tools on the platform so that machine movement will not dislodge them

- Make sure that extension cords are long enough for the full platform height and will not be pinched or severed by the scissor mechanism
- Use three-point contact and proper climbing techniques when mounting or dismounting from the machine

Important Note: Never operate equipment on which you have not been trained or which you are not comfortable operating. Your safety and that of others on site depends on competent, knowledgeable operation of the equipment.

Work Area Inspection

Before operating elevating work platforms and aerial devices, check the work area for:

- Drop offs or holes in the ground
- Slopes, bumps or floor obstructions
- Debris
- Overhead obstructions
- Overhead wires power lines or other electrical conductors
- Hazardous atmospheres
- Adequate operating surface (ground or floor)
- Sufficient ground or floor support to withstand all forces imposed by the platform in every operating condition, wind and weather conditions

FALL PROTECTION

The fall protection required for persons who work on aerial lifts depends on the type of aerial lift used. The table below shows acceptable fall protection.	
Type of Lift	Fall Protection Required
Vehicle-Mounted Elevating and Rotating Work Platforms (ANSI A92.2 devices)	Platforms other than buckets or baskets must include guardrail systems – guardrails, a midrail, and toeboards. Each person who works on a boom-supported platform must wear a body harness and lanyard attached to the boom or basket.
Manually Propelled Elevating Aerial Platforms (ANSI A92.3 devices)	The platform must have a guardrail at least 42 inches ±3 inches above the floor, a midrail, and toeboards at least 4 inches high.
Boom-Supported Elevating Work Platforms (ANSI A92.5 devices)	The platform must have a guardrail at least 42 inches ±3 inches above the floor, a midrail, and toeboards at least 4 inches high. Each worker on the platform must wear a body harness and lanyard attached to the boom or platform.
Self-Propelled Elevating Work Platforms (ANSI A92.6 devices)	The platform must have a guardrail 42 inches ±3 inches above the floor, a midrail, and toeboards at least 4 inches high.

Fall Protection for Elevating Work Platforms

- Personnel will maintain firm footing on the platform while working on the platform. The use of railings, planks, ladders, or any other devices on the platform for achieving additional height is prohibited
- A safety harness that has a lanyard which complies with construction safety standard "Fall Protection" and which is affixed to attachment points provided and approved by the manufacturer will be provided by Specialized Storage Systems, Inc and used by any occupant of an aerial work platform described in this section. A fall arrest system will only be used where the aerial lift is designed to withstand the vertical and lateral loads caused by an arrested fall
- A body belt may be used with a restraint device with the lanyard and the anchor arranged so that the employee is not exposed to any fall distance. A restraint device is required where the aerial lift cannot withstand the vertical and lateral loads imposed by an arrested fall
- Belting off to an adjacent pole, structure, or equipment while working from an aerial work platform is prohibited
- An employer will not allow employees to exit an elevated aerial work platform, except where elevated work areas are inaccessible or hazardous to reach. Employees may exit the platform with the knowledge and consent of Specialized Storage Systems, Inc. When employees exit to unguarded work areas, fall protection will be provided and used as required

Fall Protection for Aerial Devices

- Employees will always stand firmly on the floor of the basket, and will not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position
- Boom and basket load limits specified by the manufacturer will not be exceeded
- A safety belt or harness will be used with a lanyard attached to the boom or basket when working from an aerial lift. The safety belt, harness, and lanyard will be provided by Specialized Storage Systems, Inc. An in-plant, industrial-type aerial device used on a level surface and equipped with a platform with approved railings is exempt from this rule
- Body belts are not acceptable as part of a personal fall arrest system. The use of a body belt in a tethering system or in a restraint system is acceptable
- A boom platform will be provided with a rail or other structure around its upper periphery that will be not less than 38 inches above the floor of the platform and with a toeboard not less than 4 inches high. A basket of a cherry picker will be considered to meet this requirement. A platform may have the guardrail removed from the working side if a safety belt and lanyard is worn by the employee on the platform
- Belting off to an adjacent pole, structure, or equipment while working from an aerial device will not be permitted
- Climbers will not be worn while on an aerial device unless gaff guards are provided

OSHA REGULATIONS AND RESPONSIBILITIES

OSHA regulations include the following requirements:

- Elevating work platforms must be engineered and tested to meet the relevant standard for that equipment
- Aerial devices must be checked each day before use by a trained worker
- The owner or supplier must keep a log of all inspections, tests, repairs, modifications, and maintenance
- The log must be kept up to date and include names and signatures of persons who performed inspections and other work
- Workers must be given oral and written instruction before using the platform for the first time. Instruction must include items to be checked daily before use

Vehicle Mounted Elevating and Rotating Work Platforms and Aerial Devices

This section provides for the safe operation and maintenance by Specialized Storage Systems, Inc and the safe use by the employee of vehicle mounted elevating and rotating work platforms in, around, and about a place of employment. Firefighting equipment and powered industrial trucks are not included in these rules.

Employer Responsibility

An employer will provide each employee who will operate the aerial work platform with instruction and training regarding the equipment that will be used. Such instruction and training will ensure that each operator complies with the minimum following provisions:

- Is instructed by a qualified person in of the purpose and function of each control
- Is trained by a qualified person or reads and understands the manufacturer's operating instructions and safety rules
- Understands by reading or by having a qualified person explain, all decals, warnings, and instructions displayed on the aerial work platform
- Reads and understands the provisions of these rules or be trained by a qualified person on their content

The manufacturer's operating instructions and safety rules will be provided and maintained in a legible manner on each unit by Specialized Storage Systems, Inc

Maintain an aerial device free of defects and hazards that could cause an injury.

Employee Responsibility

- Operate an aerial device only after being trained and authorized by Specialized Storage Systems, Inc
- Report known defects and hazards concerning an aerial device to the supervisor

EQUIPMENT INSTRUCTIONS AND MARKING

Each unit will have a manual containing instructions for maintenance and operations. If a unit can be operated in different configurations, then these will be clearly described, including the rated capacity in each configuration.

Each aerial device placed in service will have a conspicuously displayed legible plate or other legible marking verifying the aerial device is designed and manufactured in accordance with the following applicable specifications:

- ANSI A92.2 – Vehicle Mounted Elevating and Rotating Aerial Devices
- ANSI A92.3 – Manually Propelled Elevating Work Platforms
- ANSI A92.5 – Boom Supported Elevating Work Platforms
- ANSI A92.6 – Self-Propelled Elevating Work Platforms

The above plates will contain the following data, when applicable:

- Make, model, and manufacturer's serial number
- Rated capacity
- Maximum capacity at the maximum platform height
- Platform height
- Maximum travel height
- Maximum recommended operating pressure of hydraulic or pneumatic system(s) or both
- Caution or restrictions of operation or both
- Operating instructions
- Manufacturer's rated line voltage (dielectric capability)

Alternative configurations will require in addition to the above:

- Charts, schematics, or scales of capacities in operating positions
- Cautions, restrictions, of operation of all alternate or combinations
- Employees will be instructed in the proper use of the platform

All aerial devices and elevating work platforms will be assembled and erected in accordance with these rules and will be maintained in safe operating condition.

All electrical tests will conform to the requirements of the applicable the National Fire Protection Association NFPA 70 Standard or equivalent DC voltage test approved by the equipment manufacturer or equivalent entity.

FACTORS OF SAFETY IN DESIGN OF WORK PLATFORM ASSEMBLY

- Where the platform is supporting its rated workload by a system of wire ropes or lift chains, or both, the safety factor of the wire or chain will not be less than 6 to 1
- All critical components of a hydraulic or pneumatic system used in a work platform will have a bursting strength that exceeds the pressure attained when the system is subjected to the equivalent of four times the rated workload. Critical components are those in which a failure would result in a free fall or free rotation of the boom. All noncritical hydraulic components will have a bursting safety factor of at least 2 to 1
- Automatic safety devices or systems will be provided to prevent free fall of the work platform should a failure of the power supply or elevating system occur

CONSTRUCTION, MODIFICATION, REMOUNTING, TESTING, AND USE

- An aerial device purchased, modified, or remounted must meet the requirements of ANSI A92.2
- A permanent label or tag will be affixed to an aerial device purchased, modified, or remounted certifying compliance
- An employer modifying the basic design of an aerial device will secure approval of the modification in writing from the manufacturer of the aerial device, a firm offering an equivalent service, or a qualified engineer knowledgeable in the aerial device operations. The results of the modification will be at least as safe as the original design
- An aerial device will bear a permanent plate stating the designed rating capacity
- An aerial device will be mounted on a vehicle capable of sustaining, or reinforced to sustain, the imposed load. The vehicle will be a stable support for the aerial device
- The lifting and outrigger system of an aerial device will be equipped with a means, such as but not limited to, a pilot operated check valve to ensure that the system will not permit the work platform to drop in a free fall in event of a power or hydraulic line failure
- An aerial device that does not meet the requirements ANSI A92.2 will not be used unless it has been inspected and modified as required to conform to the essential stability, structural, electrical insulation, and operational requirements
- In addition to the welding requirements prescribed in ANSI A92.2, an aerial device will conform to the AWS D2.0-69

MAINTENANCE AND REPAIRS

- The materials used in the repair of aerial devices and elevating work platforms will conform to standard specifications of strength, dimensions, and weights, and will be selected to safely support the rated workload
- Electrical wiring and equipment will meet National Fire Protection Association (NFPA) 70 provisions
- All exposed surfaces will be free from sharp edges, burrs, or hazardous projections

Electrical Ratings

- The rating plate required will include a statement as to whether the aerial device is insulated or is non-insulated and, if insulated, the rated line voltage for which the aerial device was designed and tested
- The insulating portion of an aerial device will not be altered in any manner that might reduce its insulating value

SAFETY FACTORS AND YIELD POINTS

- The design of the basic structural elements of the aerial device including the platform and its component parts will have a yield point of not less than 3 times the rated load. Structural materials not having a clearly defined yield or break point will have a designed safety factor of not less than 5
- The designed safety factor of not less than 4 will apply to hydraulic and pneumatic parts which would, on failure, permit a free fall, free rotation of the boom, or loss of stability
- Noncritical components will have a bursting safety factor of not less than 2

Controls

- The controls for the operation of an aerial device will be permanently labeled as to their function
- Controls for an aerial device will be designed or guarded to prevent inadvertent start
- Articulating, extensible boom platforms, or both, primarily designed as personnel carriers, will be equipped with both upper and lower controls. functions
- Upper controls will be located within reach of the operator
- Lower controls will be capable of overriding the upper controls. Except in case of an emergency, the lower controls will not be operated unless permission has been obtained from the employee in the basket or on the work platform

Stability Requirements for New or Modified Aerial Devices

Each new or modified aerial device will be inspected and tested before initial use to assure compliance with all of the following requirements.

- An aerial device, mounted on an approved vehicle, when used in a specific configuration, will be capable of sustaining a static load $1 \frac{1}{2}$ times its rated load capacity in every position that the load can be placed in when the vehicle is on a firm and level surface. If having the outriggers extend to a firm footing is part of the definition of the configuration, they will be extended to provide leveling for the purpose of determining whether the mobile unit meets the stability requirements
- An aerial device, mounted on an approved vehicle, when used in a specific configuration, will be capable of sustaining a static load $1 \frac{1}{3}$ times its rated load capacity in every position that the load can be placed in the when the vehicle is on a slope of 5 degrees downward in the direction most likely to cause overturning. If having the outriggers extended to a firm footing is part of the definition of the configuration, they will be extended to provide leveling for the purpose of determining whether the mobile unit meets the stability requirements
- If other facilities, such as a means of turntable leveling, are provided to minimize the effect of the sloping surface, then those facilities will be utilized when determining if the mobile unit meets the stability requirements
- Vertical towers designed specifically for operation only on a level surface will be excluded from this requirement
- None of the stability tests described will produce instability of the mobile unit, or cause permanent deformation of any component. The lifting of a tire or outrigger on the opposite side of the load does not necessarily indicate a condition of instability
- Verification by the manufacturer or an equivalent entity that the stability of an aerial device meets the requirements may be used to demonstrate compliance

Inspection and Tests

- An aerial device will be inspected and tested at least annually for permanent deformation and cracks by using $1 \frac{1}{2}$ times the rated load and for defects by visual inspection during and following the load test
- An annual electrical test of insulated aerial devices will be made. An equivalent DC voltage test may be used in place of the prescribed AC voltage
- Field inspection and tests will be performed only by an authorized and trained employee or outside service
- Lift controls will be tested each day before use to determine that the controls are in safe working condition. An aerial device with defective controls will not be used until repaired

Use

- Any overhead line will be considered energized until the owner, owner representative, or utility indicates otherwise and the line has been visibly grounded, and the owner, owner representative, or utility will be notified and provided with all pertinent information of the job before the commencement of operations near electrical lines
- Except as prescribed or where insulating barriers not a part of or an attachment to the aerial device have been erected to prevent physical contact with the lines, an aerial device will maintain the distances from energized distribution and transmission power lines and equipment prescribed in table 1
- A qualified lineman or a qualified line clearance tree trimmer performing work on or near an exposed power transmission or distribution line from an aerial lift will maintain distances prescribed in table 2, unless the employee is insulated or guarded from the energized part by gloves or gloves and sleeves, or insulated, isolated, or guarded from any other conductive part or the energized part is insulated from the employee
- A qualified telecommunications employee will maintain the distances prescribed in table 3 when working from an aerial lift, unless the employee is insulated, isolated, or guarded from any other conductive part or the energized part is insulated from the employee
- The insulated bucket, gloves, and sleeves used to comply will be rated at more than the voltage to be worked on or that with which they might come into contact
- An in-plant, industrial-type aerial lift designed to be used on level surfaces will not be used on slopes, unless the aerial lift is adjusted to a firm, level plane
- A safety belt or harness will be used with a lanyard attached to the boom or basket when working from an aerial lift. The safety belt, harness, and lanyard will be provided by Specialized Storage Systems, Inc. An in-plant, industrial-type aerial device used on a level surface and equipped with a platform with approved railings is exempt from this rule
- A boom platform will be provided with a rail or other structure around its upper periphery that will be not less than 38 inches above the floor of the platform and with a toeboard not less than 4 inches high. A basket of a cherry picker will be considered to meet this requirement. A platform may have the guardrail removed from the working side if a safety belt and lanyard is worn by the employee on the platform
- The designed rated capacity for a given altitude will not be exceeded
- A proximity warning device may be used, but not in place of meeting the requirements of this rule

TABLE 1

Minimum Clearance Distances for Equipment		
Voltage	Clearance with Boom Raised	Clearance Boom Lowered and No Load in Transit
To 50 kV	10 feet	4 feet
Over 50 kV	10 feet + .4 inch per each 1 kV over 50 kV	10 feet
50 to 345 kV		10 feet
346 to 750 kV		15 feet

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TABLE 2

Minimum Working Distances for Qualified Line Clearance Tree Trimmers and Qualified Linemen	
Voltage Range Phase to Phase (KV)	Minimum Working Distance
2.1 to 15.0	2'0"
15.1 to 35.0	2'4"
35.1 to 46.0	2'6"
46.1 to 72.5	3'0"
72.6 to 121.0	3'4"
138.0 to 145.0	3'6"
161.0 to 169.0	3'8"
230.0 to 242.0	5'0"
345.0 to 362.0	*7'0"
550.0 to 552.0	*11'0"
700.0 to 765.0	*15'0"

*NOTE: For 345 — 362 kV., 500 — 552 kV., and 700 — 765 kV., the minimum working distance and the minimum clear hot stick distance may be reduced that such distances are not less than the shortest distance between the energized part and a grounded surface.

TABLE 3

Minimum Approach Distances for Qualified Telecommunications Employees	
Voltage Range (Nominal Phase to Phase)	Minimum Approach Distances
300 V and less	12"
Over 300 V, not over 750 V	18"
Over 750 V, not over 2 kV	24"
Over 2 kV, not over 15 kV	36"
Over 15 kV, not over 37 kV	42"
Over 37 kV, not over 87.5 kV	48"
Over 87.5 kV, not over 121 kV	54"
Over 121 kV, not over 140 kV	--

Vehicles

- Before a vehicle supporting an aerial ladder is moved for highway travel, the ladders will be secured in the lower position, and the manually operated device at the base of the ladder, or other effective means, will be used to prevent elevation or rotation of the ladder
- Before a vehicle supporting an aerial lift is moved for travel, the boom will be inspected to insure that it is properly cradled and the outriggers are in the stowed position
- A vehicle supporting an aerial device will not be moved when the boom is elevated with employees in working position, unless the equipment is specifically designed for this type of operation and meets the requirements
- Brakes will be set and outriggers, when used, will be positioned on pads or a solid surface
- Wheel chocks will be installed before using an aerial device on an incline

ELEVATING WORK PLATFORMS

These rules apply to equipment that has a primary function of elevating personnel, together with their tools and necessary materials, on a platform that is mechanically positioned. The following American National Standard Institute (ANSI) units are covered:

- ANSI Standard A92.2, "Vehicle-Mounted Elevating Work Platforms"
- ANSI Standard A92.3, "Manually Propelled Elevating Work Platforms"
- ANSI Standard A92.5, "Boom-Supported Elevating Work Platforms"
- ANSI Standard A92.6, "Self-Propelled Elevating Work Platforms"

Equipment not Covered

- Equipment that has a primary function other than elevating personnel, such as fork trucks or cranes that are adapted to elevating personnel, is not covered by these rules
- Firefighting equipment

Construction

- Aerial work platforms will be designed, constructed, and tested so as to be in compliance with the requirements of ANSI standards A92.2, A92.3, A92.5, and A92.6
- Aerial work platforms will not be field-modified for uses other than those intended by the manufacturer, unless the modification has been certified in writing by the manufacturer or by any other equivalent entity, such as a nationally recognized testing laboratory, to be in compliance with the applicable ANSI standard and this rule, and to be at least as safe as the equipment was before modification

Directional controls will be in compliance with all of the following provisions:

- Be of the type that will automatically return to the off or neutral position when released
- Be protected against inadvertent operation
- Be clearly marked as to their intended function
- An overriding control will be provided in the platform which must be continuously activated for platform directional controls to be operational and which automatically returns to the off position when released
- Aerial work platforms will be equipped with emergency controls at ground level
- Emergency ground level controls will be clearly marked as to their intended function and be capable of overriding the platform controls

All of the following information will be clearly marked in a permanent manner on each aerial:

- Special workings, cautions, or restrictions necessary for operation
- Rated workload
- A clear statement of whether or not the aerial work platform is electrically insulated
- Rotating shafts, gears, and other moving parts that are exposed to contact will be guarded as required
- Attachment points will be provided for fall protection devices for personnel who occupy the platform on aerial work platforms

Inspection, Maintenance, and Testing

An employer will comply with all of the following requirements:

- Each aerial work platform will be inspected, maintained, repaired, and kept in proper working condition in accordance with the manufacturer's operating, maintenance, and repair manuals
- Any aerial work platform found not to be in a safe operating condition will be removed from service until repaired. All repairs will be made by an authorized person in accordance with the manufacturer's operating, maintenance, and repair manuals
- If the aerial work platform is rated and used as an insulated aerial device, the electrical insulating components will be tested for compliance with the rating of the aerial platform in accordance with ANSI standard A92.2, Section 6

Such testing will comply with all of the following provisions:

- The test will be performed not less than annually
- Written, dated, and signed test reports will be made available by Specialized Storage Systems, Inc for examination by OSHA
- The insulated portion of an aerial device will not be altered in any manner that might reduce its insulating value
- All danger, caution, and control markings and operational plates will be legible and not obscured

Preoperation Procedures

Before use on each work shift, an aerial work platform will be given a visual inspection by the operator for defects that would affect its safe operation and use. The inspection will consist of not less than both of the following procedures:

- Visual inspection for all of the following: cracked welds, bent or broken structural members, hydraulic or fuel leaks, damaged controls and cables, loose wire, tire condition, fuel and hydraulic fluid levels, slippery conditions on the platform
- Operate all platform and ground controls to ensure that they perform their intended function
- Before the aerial work platform is used, and during use on the job site, the operator will inspect the operational area for all of the following: ditches, drop-offs, holes, debris, bumps and floor obstructions, overhead obstructions, power lines
- The area around the aerial work platform will also be inspected to assure clearance for the platform and other parts of the unit

- All unsafe items found as a result of the inspection of the aerial work platform or work area will be corrected before further use of the aerial work platform
- When the specified clearances cannot be maintained, the owner of electrical lines or the authorized representative will be notified and provided with all pertinent information before the commencement of operations near electrical lines
- Any overhead wire will be considered to be an energized line until the owner of the line or the authorized representative states that it is de-energized

OPERATING PROCEDURES

- The aerial work platform will be used only in accordance with the manufacturer's operating instructions and safety rules.
- The following clearances will be maintained when operating aerial work platforms or other equipment under, over, by, or near energized electric power lines:

VOLTAGE	MINIMUM CLEARANCE
0 to 50 kV	10 feet
More than 50 kV	10 feet + .4 inch per kV

The clearance requirements of this rule do not apply to the following situations:

- Where work is performed from an insulated aerial device that is insulated for the work and the work is performed in accordance with the provisions of construction safety standard "Power Transmission and Distribution" and "Telecommunications"
- Where the electric power transmission or distribution lines have been de-energized and visibly grounded at the point of work or where insulating barriers that are not a part of an attachment to the aerial work platform have been erected to prevent physical contact with the line
- Where work is being performed by journeymen electricians on equipment up to .5kV.
- Two journeymen electricians will be required for work within the minimum clearance on equipment over .5kV
- Proximity warning devices may be used, but will not be used instead of meeting the requirements of this rule
- The manufacturer's rated load capacity will not be exceeded. Specialized Storage Systems, Inc will ensure that the load and its distribution on the platform are in accordance with the manufacturer's specifications. The aerial work platform rated load capacity will not be exceeded when loads are transferred to the platform at elevated heights
- Only personnel, their tools, and necessary materials will be on or in the platform
- The guardrail system of the platform will not be used to support any of the following: materials, other work platforms, employees
- Personnel will maintain firm footing on the platform while working on the platform. Using railings, planks, ladders, or anything on the platform for more height is prohibited
- Fuel gas cylinders will not be carried on platforms that would allow gas accumulation
- A safety harness that has a lanyard which is in compliance with construction safety standard "Fall Protection" and which is affixed to attachment points provided and approved by the manufacturer will be provided by Specialized Storage Systems, Inc and used by any occupant of an aerial work platform described in these rules. A fall arrest system will only be used where the aerial lift is designed to withstand the vertical and lateral loads caused by an arrested fall

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- A body belt may be used with a restraint device with the lanyard and the anchor arranged so that the employee can't fall. A restraint device is required where the aerial lift cannot withstand the vertical and lateral loads imposed by an arrested fall
- Don't belt off to adjacent pole, structure, or equipment while on an aerial work platform
- An employer will not allow employees to exit an elevated aerial work platform, except where elevated work areas are inaccessible or hazardous to reach. Employees may exit the platform with the knowledge and consent of Specialized Storage Systems, Inc. When employees exit to unguarded work areas, fall protection will be provided and used as required
- Only aerial work platforms that are equipped with a manufacturer's installed platform controls for horizontal movement will be moved while in the elevated position
- Before and during driving while elevated, an operator of a platform will:
 - Look in the direction of, and keep a clear view of, the path of travel and make sure that the path is firm and level.
 - Maintain a safe distance from: obstacles, debris, drop-offs, holes, depressions, ramps, overhead obstructions, overhead electrical lines, other hazards to safe elevated travel.
- Outriggers or stabilizers, are to be used in accordance with the manufacturer's instruction. Outriggers and stabilizers will be positioned on pads or a solid surface
- Aerial work platforms will be elevated only when on a firm and level surface or within the slope limits allowed by the manufacturer's instructions
- A vehicle-mounted aerial work platform will have its brakes set before elevating
- A vehicle-mounted work platform will have wheels chocked before using on an incline
- Climbers will not be worn while performing work from an aerial work platform
- Platform gates will be closed while the platform is in an elevated position
- Stunt driving and horseplay are prohibited
- Altering, modifying, or disabling safety devices or interlocks is prohibited
- Specialized Storage Systems, Inc will prevent ropes, cords, and hoses from entangling in the aerial work platform
- A platform operator will ensure that the area surrounding the aerial work platform is clear of personnel and equipment before lowering the platform
- Before and during travel, except as provided for horizontal movement, an operator will do all of the following: inspect to see that booms, platforms, aerial ladders, or towers are properly cradled or secured; ensure that outriggers are in a stored position; limit travel speed according to the following factors; condition of the surface; congestion; slope; location of personnel; other hazards
- The aerial work platform will not be positioned against another object to steady the platform
- The aerial work platform will not be operated from a position on a truck, trailer, railway car, floating vessel, scaffold, or similar equipment
- The boom and platform of the aerial work platform will not be used to move or jack the wheels off the ground unless the machine is designed for that purpose by the manufacturer
- If the platform or elevating assembly becomes caught, snagged, or otherwise prevented from normal motion by adjacent structures or other obstacles so that control reversal does not free the platform, all personnel will be removed from the platform before attempts are made to free the platform

Elevating Work Platform Equipment

- The platform deck will be equipped with a guardrail or other structure around its upper periphery that will be 42 inches high, plus or minus 3 inches, with a midrail. (Chains or the equivalent may be substituted where they give equivalent protection.) Where the guardrail is less than 39 inches high, an approved personal fall protection system will be used
- The configuration of an elevating work platform may include a ladder for personnel to use in reaching the platform deck. Any ladder device used in this way will have rungs located on uniform centers not to exceed 12 inches
- Any elevating work platform equipped with a powered elevating assembly and having a platform height exceeding 60 inches will be supplied with safe emergency lowering means compatible with the specific elevating assembly employed
- Any powered elevating work platform will have both upper and lower control devices. Controls will be plainly marked as to their function and guarded to prevent accidental operation. The upper control device will be in or beside the platform, within easy reach of the operator. The lower control device will have the capability to lower the platform where the operator's safety is in jeopardy
- An emergency stopping device will be provided at the upper controls of elevating work platforms
- Elevating Work Platforms will include: toeboards at sides and ends which will not be less than 4 inches high; EXCEPTION: Toeboards may be omitted at the access openings; a hinged trap access door, if applicable; a platform whose minimum width will not be less than 16 inches

Guarding of Moving Parts

All rotating shafts, gearing, and other moving parts will be guarded.

Stability on Inclined Surfaces

Unless recommended for such use by the manufacturer, no elevating work platform will be used on an inclined surface. Procedures for maintaining stability must be clearly outlined in the special warnings section of user's manual. The user will not deviate from the manufacturer's instructions.

Operating Instructions (Elevating Work Platforms)

- No employee will ride, nor tools, materials, or equipment be allowed on a traveling elevated platform unless the following conditions are met: the travel speed at Maximum Travel Height does not exceed 3 feet per second; self-propelled units will be equipped with electrical or other interlock means that will prevent driving them with the platform height greater than the Maximum Travel Height or at speeds greater than permitted at Maximum Travel Height; the surface upon which the unit is being operated is level with no hazardous irregularities or accumulation of debris that might cause a moving platform to overturn
- Units will be assembled, used, and disassembled in accordance with the manufacturer's instructions
- Units will be assembled, and used only by personnel who have been trained in their use. Units will be inspected for damaged and defective parts before use
- Units will not be loaded in excess of the design working load and will be taken out of service when damaged or weakened from any cause. They will not be used until repairs are completed
- Employees will not sit, stand, or climb on the guardrails of an elevating work platform or use planks, ladders, or other devices to gain greater working height or reach

- Employees will not work on units when exposed to high winds, storms, or when they are covered with ice or snow (unless provisions have been made to ensure the safety of the employees)
- Employees climbing or descending vertical ladders will have both hands free for climbing

NOTE: Remove foreign substances from your shoes (e.g. mud, grease).

- Where moving vehicles are present, the work area will be marked with warnings such as flags, roped off areas or other effective means of traffic control will be provided
- Unstable objects such as barrels, boxes, loose brick, tools, debris, will not be allowed to accumulate on the work level
- In operations involving production of small debris, chips, etc., and the use of small tools and materials, and where persons are required to work or pass under the equipment, screens will be required between toeboards and guardrails. The screen will extend along the entire opening, will equal No. 18 gage U.S. Standard Wire ½-inch mesh

PIN-ON PLATFORMS

- Pin-on platforms will be securely pinned to the boom or boom extension
- Employees on the elevated pin-on platform will be secured to the boom by a safety belt and lanyard or a body belt and safety strap
- Aerial baskets or platforms will not be supported by adjacent structure(s) when workers are on the platform or in the basket while in an elevated position
- Lift controls will be tested in accordance with the manufacturer's recommendations or instructions prior to use to determine that such controls are in safe working condition.
- Only authorized persons will operate an aerial device
- Belting off to an adjacent pole, structure, or equipment while working from an aerial device will not be permitted
- Employees will not sit or climb on the edge of the basket or use planks, ladders or other devices to gain greater working height
- Boom and basket and platform load limits specified by the manufacturer will not be exceeded
- When elevating personnel with the vehicle stationary the braking systems will be set
- Provided they can be safely installed, wheel chocks will be installed before using an aerial device on an incline
- When used, outriggers will be positioned on pads or a solid surface. All outriggers will be equipped with hydraulic holding valves or mechanical locks at the outriggers
- Climbers will not be worn while performing work from an aerial device
- When an insulated aerial device is required, the aerial device will not be altered in any manner that might reduce its insulating value
- An aerial device truck will not be moved when the boom is elevated in a working position with employees in the basket or platform except when all of the following are complied with:
 - The equipment is specifically designed for this type of operation.
 - All controls and signaling devices are tested and are in good operating condition.
 - An effective communication system will be maintained at all times between the basket or platform operator and where applicable, the vehicle operator.
 - The route to be traveled is surveyed immediately prior to the work trip, checking for overhead obstructions, traffic, holes in the pavement, ground or shoulder, ditches, slopes, etc., for areas other than paved, a survey should be made on foot.
 - The speed of the vehicle does not exceed three (3) miles per hour.

- Only one employee is in the basket.
- Both the driver and/or the elevated employee have been specifically trained for this type of work (towering) in accordance with the manufacturer's recommendations.
- Lower level controls will not be operated unless permission has been obtained from the employee in the device, except in case of emergency
- Before moving an aerial device for travel, the boom(s) will be inspected to see that it is properly cradled and outriggers are in stowed position
- An employee, while in an elevated aerial device, will be secured to the boom, basket or tub of an aerial device through the use of a safety belt, body belt, or body harness equipped with safety strap or lanyard.
- Safety belts/body belts are prohibited for use in personal fall arrest systems, but may be used as part of a fall restraint or positioning device system.
- Safety belts/body belts used as part of a positioning device system will be rigged such that an employee cannot free fall more than 2 feet.
- A body harness may be used in a personal fall restraint, positioning or fall arrest system. When a body harness is used in a fall arrest system, the lanyard will be rigged with a deceleration device to limit maximum arresting force on an employee to 1,800 pounds and prevent the employee from hitting any levels or objects below the basket or platform, and will limit free fall to a maximum of 6 feet.

ATTACHMENTS

- Aerial Lift Equipment Daily Inspection/Checklist
- Scissor Lift Operator Daily Inspection/Checklist

SPECIALIZED STORAGE SYSTEMS, INC HSE

AERIAL LIFT EQUIPMENT DAILY INSPECTION/CHECKLIST (PAGE 1 OF 4)

Use only equipment which is in safe working condition. DO NOT operate equipment that needs repair.			
Company:	Location of Use:	Time:	Date:
Operator's Name:		Supervisor's Name:	
Inspector(s) Name:		Hour Meter Reading:	
Equipment Type:	Equipment ID Numbers:		Manufacturer:
GENERAL SITE INFORMATION			
OK REPAIR N/A		OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Hazard assessment of work area?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Operator's manual on lift?
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Controls in place for identified hazards?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Ground man available for emergency descent who is knowledgeable of descent valve operation?
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Work areas properly signed and barricaded?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Test controls – including emergency descent valve?
CARRIER VEHICLE			
OK REPAIR N/A		OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Motor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Cab
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Crank case oil is clean and full	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Steering
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Engine coolant is about 2" below cap	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Lights
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Clutch /Converter	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Tires properly inflated
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Drive Line	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Cuts or bulges in the tires
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Transmission fluid at proper level	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Wheels and Lug Nuts secure
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Frame	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Fire Extinguisher
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Brakes	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Cab Glass
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Differentials	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Warning Lights and Alarm
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Outriggers	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Access

SPECIALIZED STORAGE SYSTEMS, INC HSE

AERIAL LIFT EQUIPMENT DAILY INSPECTION/CHECKLIST (PAGE 2 OF 4)

Use only equipment which is in safe working condition. DO NOT operate equipment that needs repair.			
HYDRAULICS			
OK REPAIR N/A		OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Relief Valve(s)	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Pumps
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Restrictor Valves	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Bearings
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Pipe Lines	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Check hydraulic oil level
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Hose Lines	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Mounting Bolts
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Outrigger Cylinders	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Swing Gear
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Boom Crowd Cylinders	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Swing Pinion
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Control Valves	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Seals—Hydraulic
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Swing Motor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Leaks
BOOM			
OK REPAIR N/A		OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Shipper Welds	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Support Roller
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Boom Welds	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Boom Pins
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Pins—Boom Pivot	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Boom Main Section

SPECIALIZED STORAGE SYSTEMS, INC HSE

AERIAL LIFT EQUIPMENT DAILY INSPECTION/CHECKLIST (PAGE 3 OF 4)

Use only equipment which is in safe working condition. DO NOT operate equipment that needs repair.			
OPERATIONAL CHECKS			
OK	REPAIR	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operators familiar with load charts?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Test emergency descent valve?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outrigger pads not cracked?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hydraulic hoses in good condition?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does boom swing break work properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outriggers fully extended, working properly, and swing radius barricades in place?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom angle indicator is available and working?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Swing through 360 degrees, does boom angle indicator stay the same throughout rotation?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Engine is started and gauges are checked and working properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Extend out the boom, are all sections extending evenly?
Comments:			
Signature (person(s) performing inspection/evaluation):			Date:

AERIAL LIFT EQUIPMENT DAILY INSPECTION/CHECKLIST (PAGE 4 OF 4)

Items to check during the daily inspection:

- Check all welds between cylinders and booms for cracks or wear
- Inspect all pivot pins for security of their locking devices
- Check exposed cables, sheaves, and leveling devices for wear and secure attachment
- Inspect hydraulic system for frayed hoses and leaks
- Check lubrication and fluid levels
- Inspect boom and basket for cracks or abrasions
- Check for the load capacity posting
- Operate boom from ground controls through one complete cycle

Prestart Checks:

- Ensure that there are no obstacles around the work platform and in the path of travel such as holes, drop offs, ditches, soft fill, or debris
- Check overhead clearances
- Make sure the batteries are fully charged. Disconnect the AC charger cord from the external power source
- Make sure that the Free-Wheeling Valve is fully closed
- Make sure all guardrails and lock-pins are in place and locked in position
- Make sure both side battery and hydraulic trays are closed and locked

What to do when using a bucket or other aerial device:

- Wear a safety harness connected to the boom. Do not attach safety harness to adjacent pole or structure
- Ensure that no one is in the area before lowering stabilizers, outriggers, or the boom
- Ensure that each axle is horizontal when vehicle is parked on a hill. Work with the boom pointed uphill beyond the vehicle center
- Protect a roadway job site with traffic warning signs, lights, and barricades. Determine if extended boom movements will interfere with traffic
- Secure all tools when not in use
- Maintain the recommended distance from electrical wires unless you and the bucket are certified for electrical work
- Face the direction of travel
- Operate hydraulic controls slowly for smooth platform motion

What not to do:

- Do not stand on top of a bucket or use planks or ladders to gain extra height
- Do not exceed the rated load limit
- Do not ride from one job to another in the bucket
- Don't climb from bucket to another position without being secured to new position
- Do not work above other workers. Clear the area below
- Do not throw tools to or from an elevated bucket
- Do not attempt to slow any air or hydraulic leak by using your hand or body

SPECIALIZED STORAGE SYSTEMS, INC HSE

SCISSOR LIFT OPERATOR DAILY INSPECTION/CHECKLIST (PAGE 1 OF 4)

Company:		Time:	Date:
Site Location:		Job Foreman/ Supervisor:	
Person(s) Making Inspection:			
Equipment Type:	Equipment ID Numbers:	Manufacturer:	
MECHANICAL			
OK REPAIR N/A			
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Structural damage or cracked welds—Visual walk-around inspection.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Parking brake—Check operation.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Tires/wheels and fasteners—Visually inspect, check operation and tightness.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Guides/rollers and slider pads—Visually inspect, check operation, and ensure there is no metal to metal contact with slider, slider side, or running surface. Check for free movement of surface. Also check for free movement of the slider pin through the slider.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Railings and railing lock pins—Visually inspect and check tightness.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Entry chains or gates—Check operation and tightness.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Bolts and fasteners—Check tightness.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Safety Bar—Check operation.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Wheel Bearings and King pins—Visually inspect, check operation and lubricate.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Pothole Protection—Visually inspect and check operation.		
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Steering cylinder and tie rod—Visually inspect, check operation and lubricate.		

SPECIALIZED STORAGE SYSTEMS, INC HSE

SCISSOR LIFT OPERATOR DAILY INSPECTION/CHECKLIST (PAGE 2 OF 4)

ELECTRICAL	
OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Battery fluid level—Visually inspect.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Control switches—Visually inspect and check operation.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Cables and wiring harnesses—Visually inspect.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Battery Terminals—Visually inspect and check tightness.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Terminals and Plugs—Check tightness.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Generator/receptacle—Visually inspect and check operation.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Limit switches—Check operation.
HYDRAULIC	
OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Hydraulic oil reservoir level—Check oil level.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Hydraulic Hoses/Fittings—Visually inspect and check for leaks.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Lift/lowering time—Check operation and refer to specification tables.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Cylinders—Visually inspect and check operation.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Emergency lowering—Check operation.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Lift capacity—Check relief valve setting and refer to specification tables.

SPECIALIZED STORAGE SYSTEMS, INC HSE

SCISSOR LIFT OPERATOR DAILY INSPECTION/CHECKLIST (PAGE 3 OF 4)

MISCELLANEOUS	
OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Manual—Visually check that proper manual is in box.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Placards, ID plates, warnings and control labels—Replace if missing/illegible.
PRESTART CHECKS	
OK REPAIR N/A	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Ensure that there are no obstacles around the work platform and in the path of travel such as holes, drop offs, ditches, soft fill, or debris.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Check overhead clearances.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Make sure the batteries are fully charged. Disconnect the AC charger cord from the external power source.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Make sure that the Free-Wheeling Valve is fully closed.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Make sure all guardrails and lock-pins are in place and locked in position
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Make sure both side battery and hydraulic trays are closed and locked.
<p>NOTE: At any point during this inspection there are any deficiencies, do not operate lift any further. Notify the proper personnel or repair unit as needed. Do not operate equipment without proper authorization and training.</p>	
Signature (person(s) performing inspection/evaluation):	Date:

SCISSOR LIFT OPERATOR DAILY INSPECTION/CHECKLIST (PAGE 4 OF 4)

Items to check during the daily inspection:

- Tires for proper pressure and wheels for loose or missing lug nuts
- Steer cylinder, linkage, and tie rods for loose or missing parts, damage, and leaks
- Hydraulic oil for leaks and fluid level. Hydraulic hoses, lift cylinder(s), and connections for leaks or loose connections
- Fuel supply – adequate fuel, filler cap in place, no damage, leaks, or spills
- Battery for fluid level and state of charge
- Proper connection of all quick-disconnect hoses
- Structural components for damage, broken parts, cracks in welds, including scissor arms, outrigger arms, and pads
- Ladder or steps for damage and debris (ladder must be firmly secured to the platform and relatively free of grease, mud and dirt)
- Beacon and warning lights for missing and defective lenses or caps
- Ground controls (manual and powered) – including emergency stop switch and platform lower/lift switch – for proper function and damaged and missing control sticks/switches
- Decals and warning signs to make sure they are clean, legible, and conspicuous

After mounting the platform, check:

- Platform assembly for missing or loose parts, missing or loose lock pins and bolts
- Platform floor for structural damage, holes, or cracked welds and any dirt, grease, or oil that can create a hazard
- Operator's manual to make sure it is in place
- Extendable platform deck for ease of extension/retraction and proper function of locking position of platform
- Guardrails to make sure they are in place and secure
- Access gate for ease of movement, missing parts, latch, and locking capabilities
- All fall protection anchorage points
- All control mechanisms for broken or missing parts
- All emergency controls for proper function – stopping, descending, master OFF switch
- All safety devices such as tilt and motion alarms for malfunction
- Swivels for freedom of rotation
- Scissors for smooth movement up and down
- Brakes for stopping capabilities
- Horn for proper function

POLICY

Specialized Storage Systems, Inc will use Ground Fault Circuit Interrupters (GFCI) on all jobsites when possible. When GFCI equipment is infeasible, the Assured Equipment Grounding Conductor Program (AEGCP) with the following guidelines, procedures, engineering controls, and work practices will be enforced to eliminate injuries from malfunctions, improper grounding and defective electrical tools and systems

RESPONSIBILITIES

David Cali is the Competent Person in charge of the AEGCP.

TRAINING

David Cali will provide training to ensure that the grounding requirements, purpose, function, and proper use of tools to be used in the normal function of their jobs is understood by employees and that the knowledge and skills required for the safe application, and usage is acquired by employees.

PROCEDURES

- A written description of this program, are available on the jobsite for inspection or copying by OSHA and any affected employee from David Cali upon request.
- This AEGCP applies to all Specialized Storage Systems, Inc sites, covering all cord sets and receptacles that are not part of the building or structure, and equipment connected by cord and plug which are available for use or used by employees.
- Specialized Storage Systems, Inc will not provide or allow employees to use equipment that does not meet the AEGCP requirements.

Installation

Equipment grounding conductors shall be installed as follows:

All 120-volt, single-phase, 15- and 20-ampere receptacles shall be of the grounding type and their contacts shall be grounded by connection to the equipment-grounding conductor of the circuit supplying the receptacles in accordance with the applicable requirements of the National Electrical Code.

All 120-volt cord sets (extension cords) shall have an equipment-grounding conductor that shall be connected to the grounding contacts of the connector on each end of the cord.

The exposed noncurrent-carrying metal parts of 120 volt cord and plug connected tools and equipment that are likely to become energized shall be grounded in accordance with the applicable requirements of the National Electrical Code.

Inspections and Tests

Each day, before use, employees are required to visually inspect each extension cord, or other device, and any equipment connected by cord and plug, for external defects, such as deformed or missing pins or insulation damage, and for signs of possible internal damage. Cord sets, devices, and receptacles that are fixed and not exposed to damage are exempt from this inspection. Employees are prohibited from using damaged or defective equipment. Any equipment found to be damaged or defective will be immediately tagged “DO NOT USE” and removed from service.

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

Testing Schedule

All required tests must be performed by a competent person: All equipment grounding conductors will be tested for continuity and will be electrically continuous. Each receptacle and attachment cap or plug will be tested for correct attachment of the equipment grounding conductors. The equipment grounding conductor will be connected to its proper terminal:

- Before first use
- Before equipment is returned to service following any repairs
- Before equipment is used after any incident which can be reasonably suspected to have caused damage (for example, when a cord set is run over)
- At intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding six months

Test Records

- A log will be kept on the job-site of all tests performed. These records will be kept until replaced by a newer record. The log will include:
 - Pass/Fail record of each receptacle, cord set, and cord- and plug-connected equipment that was tested
 - Date of testing or test intervals
 - The equipment will be marked with the test date or a color-coded tape will delineate the most recent test, for example

WINTER	White
SPRING	Green
SUMMER	Red
FALL	Orange

POLICY

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

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

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

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

David Cali is responsible for evaluating the effectiveness of the program and maintaining all records.

RESPONSIBILITIES

Employer Responsibilities

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

Safety Committee Responsibilities

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

Employee Responsibilities

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

TRAINING

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

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

Training Components

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

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

Training Records

David Cali is responsible for maintaining all Specialized Storage Systems, Inc training records. Training records will include the following information:

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

SAFE PRACTICES

Exposure Determination

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

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

Methods of Compliance

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

Engineering and Work Practice Controls

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

Handwashing

- Specialized Storage Systems, Inc will provide accessible handwashing facilities to every employee. If providing handwashing facilities is not feasible, Specialized Storage Systems, Inc will provide antiseptic towelettes or an appropriate antiseptic hand cleanser in conjunction with clean cloth/paper towels
- For construction projects, employers must: provide onsite general washing facilities (one per 20 employees), keep them in sanitary condition, and provide suitable cleaning agents/towels for the removal of hazardous and other substances
- In addition to basic workplace hygiene requirements, employees will wash their hands as soon as possible after removing gloves or other PPE
- Should an employee's skin or mucous membrane be exposed to potentially infectious materials, the employee will immediately wash their skin with soap and water or flush their mucous membranes with water

Sharps

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

Other Engineering and Work-Practice Controls

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

Personal Protective Equipment (PPE)

- Where the possibility of occupational exposure exists, Specialized Storage Systems, Inc will provide PPE appropriate to the hazards and the work. Appropriate PPE is impermeable to blood or OPIM under normal conditions and durations
- PPE will be provided and maintained free to employees in appropriate sizes, and provisions will be made should an employee be allergic to gloves normally provided
- An employee may decline using appropriate PPE under “rare and extraordinary circumstances” when PPE use might prevent the delivery of health care or public safety services. These exceptions will be investigated and documented to prevent future occurrences
- PPE will be removed as soon as feasible before leaving the general work area. After removal, the employee will place contaminated PPE in an appropriate area or container to be stored, washed, decontaminated, or disposed of

Gloves

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

Masks, Eye Protection, and Face Shields

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

Gowns, Aprons, etc.

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

Housekeeping

- Employees will keep the workplace clean and sanitary. Specialized Storage Systems, Inc will implement a written schedule for cleaning and decontamination based on the demands of the site
- Employees will use an appropriate disinfectant to clean and decontaminate contaminated or potentially contaminated work surfaces after any spill of infectious materials, and at the end of the work shift. Specialized Storage Systems, Inc will replace protective surface coverings as soon as possible if they are contaminated. Bins, cans, pails or other receptacles that may become contaminated should be inspected and decontaminated regularly, in addition to being decontaminated as soon as feasible after visible contamination. Employees must not pick up, by hand, any broken glassware that may be contaminated. Use a brush/dustpan or tongs

Laundry

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

HEPATITIS B VACCINATION

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

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

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

POST-EXPOSURE EVALUATION AND FOLLOW UP

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

In Case of Exposure

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

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

Administrative Responsibilities Following Exposure

Specialized Storage Systems, Inc will ensure that the health care professional responsible for post-exposure evaluation and follow-up receives the following:

Counseling

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

RECORDKEEPING

Medical Records

Specialized Storage Systems, Inc will maintain a confidential medical record for every employee with occupational exposure that will include at least the following:

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

David Cali is responsible for maintaining all Specialized Storage Systems, Inc medical records.

Sharps Injury/Exposure Incident Log

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

The Sharps Injury Log must include:

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

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

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

HAZARD COMMUNICATION

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

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



Figure 1

REVIEW AND UPDATE OF EXPOSURE CONTROL PLAN (ECP)

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

Reviews and updates will:

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

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

ATTACHMENTS

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

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

EXPOSURE CONTROL PLAN DOCUMENT FORM

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

HEPATITIS B DECLINATION STATEMENT FORM

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

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

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

EXPOSURE INCIDENT REPORT FORM

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

EVALUATING PHYSICIAN'S WRITTEN OPINION FORM

To the Evaluating Physician:

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

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

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

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

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

Please return this sheet to this employee.

Thank you for your evaluation of this employee.

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

POLICY

Specialized Storage Systems, Inc has implemented this policy to ensure no employee is exposed to electrical welding hazards in the workplace.

REFERENCES

- §3203 – Injury and Illness Prevention
- §4851 – Arc Welding and Cutting
- §4853 – Inert-Gas Metal-Arc Welding
- §3382 – Eye and Face Protection

RESPONSIBILITIES

Employer Responsibilities

- Identifying employees who are qualified welders
- Ensuring that safety inspections of the facility occur on regular basis
- Training personnel in how to perform a job hazard analysis
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Supervisor Responsibilities

- Establishing and maintaining safe and healthful working conditions
- Being familiar with arc welding safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures and practices for controlling exposure to hazards
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

Employee Responsibilities

- No employee is expected to undertake a job until he/she has received instructions on how to do it properly and safely, and is authorized to perform the job
- No employees should undertake a job that appears to be unsafe
- Mechanical safeguards must always be in place and kept in place
- Employees are to report to a superior or designated individual all unsafe conditions encountered during work
- Personal Protective Equipment (PPE) must be used when and where required, and properly maintained

TRAINING

Specialized Storage Systems, Inc will ensure all employees are trained and aware of all present jobsite hazards, including fire hazards. Specialized Storage Systems, Inc employees will be instructed in hazard recognition, the procedures to follow in order to protect themselves from the injury, basic emergency first aid procedures in the event of an injury, and the applicable personal protective equipment.

Documentation of qualifications will be maintained in departmental personnel files. Documentation will include records of academic courses, experience, on the job training, safety courses, and task related certification. The employer will document that each employee has received the training. This documentation will be made when the employee demonstrates proficiency in the work practices involved and will be maintained for the duration of the employee's employment. The documentation will contain the content of the training, each employee's name, and dates of training.

Specialized Storage Systems, Inc requires retraining when workplace changes necessitate safety-related work practices that are different from what the employee normally uses. Different work practices may be new technology, types of equipment or changes in procedures. Retraining will be performed at least every three years.

SAFE PRACTICES

General Rules for Electric Welding

- When electrode holders are left unattended, electrodes must be removed and holders placed to prevent employee injury
- Hot electrode holders must not be dipped in water
- When arc welders or cutters leave or stop work or when machines are moved, the power supply switch must be kept in the off position
- Arc welding or cutting equipment having a functional defect must not be used
- The control apparatus of arc welding machines must be enclosed except for operating wheels, levers, and handles
- Input power terminals, top change devices and live metal parts connected to input circuits must be enclosed and accessible only by means of insulated tools
- When arc welding is performed in wet or high humidity conditions, employees must use additional protection, such as rubber pads or boots, against electric shock

Welder Protection

Specialized Storage Systems, Inc will ensure where possible, the welder is inside an individual booth painted with a low reflective finish, such as zinc oxide and lamp black, or will be enclosed with noncombustible screens with a low reflective finish. Booths and screens will permit air circulation at floor level. Anybody near the welding areas not protected from the rays by noncombustible or flameproof screens or shields must wear appropriate goggles.

Welding machines must be left on the outside of a confined space and heavy portable equipment will be blocked to prevent accidental movement.

When operations are suspended for any substantial period of time, such as during lunch or overnight, welding machines will be shut off at some point outside the confined space. Where practicable, the electrodes and electrode holders will be removed from the confined space. All electrodes will be removed from the holders and the holders carefully located to prevent accidental contact. Upon completion or discontinuance of welding operations, the welder will provide some means of warning other workers of the location of hot metal.

Manual Electrode Holders

It is a requirement of Specialized Storage Systems, Inc that only manual electrode holders intended for arc welding and cutting and capable of handling the maximum current required for such welding or cutting will be used.

Current-carrying parts passing through those portions of the holder gripped by the user and through the outer surfaces of the jaws of the holder must be insulated against the maximum voltage to ground.

Welding Cables and Connectors

It is the policy of Specialized Storage Systems, Inc that when performing welding on cable and/or connectors the following rules must be applied:

- Arc welding and cutting cables must be insulated, flexible and capable of handling the maximum current required by the operations, taking into account the duty cycles
- Only cable free from repair or splice for 10 feet (3 m) from the electrode holder can be used unless insulated connectors or splices with insulating quality equal to that of the cable are provided
- When a cable other than the lead wears and exposes bare conductors, the portion exposed must not be used until it is protected by insulation equivalent in performance capacity to the original
- Insulated connectors of equivalent capacity must be used for connecting or splicing cable. Cable lugs, where used as connectors, must provide electrical contact. Exposed metal parts must be insulated

Ground Returns and Machine Grounding

It is the determination of Specialized Storage Systems, Inc to ensure ground return cables will have the current-carrying capacity equal to or exceeding the total maximum output capacities of the welding or cutting units served. Structures or pipelines, other than those containing gases or flammable liquids or conduits containing electrical circuits, may be used in the ground return circuit if their current-carrying capacity equals or exceeds the total maximum output capacities of the welding or cutting units served.

- Structures or pipelines forming a temporary ground return circuit must have electrical contact at all joints. Arcs, sparks or heat at any point in the circuit must cause rejection as a ground circuit
- Structures or pipelines acting continuously as ground return circuits must have joints bonded and maintained to ensure that no electrolysis or fire hazard exists
- Arc welding and cutting machine frames must be grounded, either through a third wire in the cable containing the circuit conductor or through a separate wire at the source of the current. Grounding circuits must have resistance low enough to permit sufficient current to flow to cause the fuse or circuit breaker to interrupt the current
- Ground connections will be mechanically and electrically adequate to carry the current

Inert-Gas Metal-Arc Welding

Employees will not engage in and will not be exposed to the inert-gas metal-arc welding process unless the following precautions are taken:

- Chlorinated solvents will not be used within 200 feet (61 m) of the exposed arc. Surfaces prepared with chlorinated solvents will be thoroughly dry before welding is performed on them
- Employees in areas not protected from the arc by screening will be protected by appropriate filter lenses in accordance with the requirements of CAL-OSHA regulation Title 8 3382
- When welders are exposed to their own arc or to each other's arc, filter lenses complying with the requirements of 3382 will be worn to protect against flashes and radiant energy
- Employees exposed to radiation will have their skin covered completely to prevent ultraviolet burns and damage. Helmets and hand shields will not have leaks, openings or highly reflective surfaces
- Inert-gas metal-arc welding on stainless steel will not be performed unless exposed employees are protected either by local exhaust ventilation or by wearing supplied air respirators

POLICY

Specialized Storage Systems, Inc has developed this policy to ensure proper safe work practices and procedures are followed to protect employees from the fall hazards. This policy applies to all employees, jobsites, and all personnel working on property owned by Specialized Storage Systems, Inc, including subcontractors who provide services to Specialized Storage Systems, Inc.

REFERENCES

- §1510 – Code of Safe Practices
- §1511 – General Safety Precautions
- §1513 – Housekeeping
- California Code of Regulations Article 24 – Fall Protection
- §3203 – Injury and Illness Prevention Program
- §3209 – Standard Guardrails

RESPONSIBILITIES

Specialized Storage Systems, Inc has developed this policy to ensure proper safe work practices and procedures are followed to protect employees from the fall hazards. David Cali is the Program Administrator responsible for managing and supervising the fall protection program. David Cali will develop and maintain site specific fall protection plans.

Supervisors

- Establishing and maintaining safe and healthful working conditions
- Being familiar with electrical safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures and practices for controlling exposure to hazards
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

Employees

Employees will wear approved personal fall arrest, personal fall restraint, or positioning systems when work exposes them to falling more than 7.5 feet from any of the following: the perimeter of a structure; unprotected sides and edges; leading edges; shaftways and openings; sloped roof surfaces steeper than 7:12; or any other sloped surface steeper than 40 degrees not otherwise protected.

- No employee is expected to undertake a job until he/she has received instructions on how to do it properly and safely, and is authorized to perform the job
- No employees should undertake a job that appears to be unsafe
- Mechanical safeguards must always be in place and kept in place
- Report to a designated supervisor unsafe conditions

TRAINING

Specialized Storage Systems, Inc will ensure all employees are trained and aware of all present jobsite hazards, including fall hazards, hazard recognition, the procedures to follow in order to protect themselves from the injury, basic emergency first aid procedures in the event of an injury, and the applicable personal protective equipment.

Documentation of qualifications will be maintained in departmental personnel files. Documentation will include records of academic courses, experience, on the job training, safety courses, and task related certification. The employer will document that each employee has received the training. This documentation will be made when the employee demonstrates proficiency in the work practices involved and will be maintained for the duration of the employee's employment. The documentation will contain the content of the training, each employee's name, and dates of training.

Specialized Storage Systems, Inc requires retraining when workplace changes require new safe work practices. Retraining will be performed at least every three years.

PROCEDURES

Personal Fall Arrest System Rules

When Specialized Storage Systems, Inc employees use PFAS, David Cali will inspect the fall arrest systems implemented and ensure:

- When stopping a fall, the impact force to the body is no greater than 1,800 lbs, when using shock absorbing lanyards and a body harness
- Employees rig the fall arrest system to minimize free fall distance by no more than 6 feet nor contact any lower level, and, where practicable, secure the anchor end of the lanyard at waist level to the employee
- The fall arrest system, when stopping a fall, brings the employee to a complete stop and maximum deceleration distance an employee travels to 3.5 feet
- The fall arrest system(s) are strong enough to withstand twice the potential impact energy of an employee free falling from a distance of 6 feet, or the fall distance permitted by the system, whichever is less

Fall Protection Anchor Points

PFAS anchors need to be separate from platforms and capable of supporting at least 5,000 pounds for each employee attached. Otherwise, the anchorages must be designed, installed, and used as part of a complete fall arrest system that maintains a safety factor of no less than two, and underneath the supervision of a competent, qualified person.

Positioning Device Systems

For any positioning device systems being used by Specialized Storage Systems, Inc employees, David Cali will ensure the systems are rigged so that the employee cannot free fall a distance greater than two (2) feet. David Cali, or a designated competent person, will inspect the positioning device system prior to use for wear, damage, and other deterioration. Defective parts will be immediately removed from service.

David Cali will ensure any snaphooks used can be locked and fastened securely. Non-locking snaphooks are prohibited from use. If a snaphook is unable to lock completely, it will be removed from service immediately and replaced.

David Cali will inspect the anchorage points for the positioning device and ensure the anchorage points are capable of supporting at least two times the intended load or 3,000 pounds, whichever is greater.

Emergency Planning

If a hazard cannot be eliminated, workers will be protected with an appropriate fall-protection system or method. Specialized Storage Systems, Inc will provide for the prompt rescue of any worker suspended in a personal fall-arrest system.

Specialized Storage Systems, Inc will prepare, update, and approve written rescue and evacuation procedures that include anchorage locations, connecting means, body supports, and other required fall protection equipment. Specialized Storage Systems, Inc will provide and ensure a prompt rescue can be accomplished in the event of a fall with the rescue and evacuation procedures.

All fall arresting, descent control, and rescue equipment must be approved, used according to manufacturer's recommendations, and kept in good repair. Safety belts, harnesses, and lanyards will meet American National Standards Institute (ANSI) A10.14-1975 and labeled accordingly.

Specialized Storage Systems, Inc will ensure all lifelines and anchorages utilized are capable of supporting, at a minimum, a dead weight of 5,000 pounds.

The Fall Protection Plan

Employees doing leading edge work, precast concrete work, or residential construction work for whom conventional fall protection equipment is not feasible or creates a greater hazard may be protected by a fall protection plan instead. Fall protection plans used by Specialized Storage Systems, Inc will conform to the following standards, and will be approved by David Cali or other qualified person who must be named on the plan.

Fall Protection Plan Rules

- The fall protection plan will be prepared and kept up to date by David Cali or a designated qualified person specifically for the site where the leading edge, concrete, or residential construction work is performed
- A qualified person must approve any changes to the fall protection plan
- A copy of the fall protection plan and changes must be maintained at the jobsite
- A competent person – named in the fall protection plan - will implement the plan
- protection systems (such as guardrail systems, personal fall arrest systems, or safety nets systems) is infeasible or why their use would create a greater hazard
- The fall protection plan will include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard for workers who cannot be provided with protection from the conventional fall protection systems. For example, Specialized Storage Systems, Inc will discuss the extent to which scaffolds, ladders, or vehicle mounted work platforms can be used to provide a safer working surface and thereby reduce the hazard of falling
- The fall protection plan will identify each location where conventional fall protection methods cannot be used. These locations will then be classified as “controlled access zones” and adhere to all appropriate policies and regulations
- Where no other alternative measure has been implemented, Specialized Storage Systems, Inc will implement a safety monitoring system
- The fall protection plan must include a statement which provides the name or other method of identification for each employee who is designated to work in controlled access zones. No other employees may enter controlled access zones
- In the event that an employee falls, or some other related serious incident occurs, Specialized Storage Systems, Inc will investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g. new practices, procedures, or training) and will implement those changes to prevent similar types of falls or incidents

Safety Nets

Safety net systems consist of mesh nets and connecting components. They must be used where working surfaces are 25 feet or more above the ground, water surface, or continuous floor level below.

When the use of more conventional types of protection (such as personal fall arrest systems, personal fall restraint systems, positioning device systems, etc.) are clearly impractical, the interior and/or exterior perimeter of the structure must be provided with an approved safety net reaching no less than 8 feet horizontally from the perimeter and positioned at a distance no more than 10 feet vertically below the hazards, or equivalent protection provided safety nets will extend outward from the outermost projection of the surface as illustrated in the following table:

Minimum horizontal distance from the edge of working surface to the net’s outer edge

Net distance below working surface	Minimum horizontal distance
Up to 5 feet	8 feet
5 feet to 10 feet	10 feet
10 feet to 30 feet	13 feet

- Safety net openings can’t be more than six inches on a side, center to center
- Safety nets must not be installed more than 10 feet below where the fall hazards exist
- An installed net must be able to withstand a drop test consisting of a 400 pound sandbag, 30 inches in diameter, dropped from the working surface and provide adequate clearance to the surface or structures below
- Safety nets will be regularly inspected and any debris will be removed no later than the start of the next work shift

Controlled Access Zones

Whenever the Fall Protection Plan identifies a Controlled Access Zone (e.g. an area where leading edge and other operations are taking place), the controlled access zone will be marked by a control line or other equivalent means that restricts access to the zone. Specialized Storage Systems, Inc will post signs in easily visible areas to warn unauthorized employees to stay out of the controlled access zone. David Cali will designate a competent person to monitor the control zone and ensure the safety of other (unauthorized) employees.

Protecting Workers from Falling Objects

Any Specialized Storage Systems, Inc employee working on an elevated surface must be familiar with the systems and methods that control their exposure to fall hazards; they must also ensure their tools and equipment don’t endanger workers below them.

Waste, materials, and tools must not be thrown from any building or structure to an area where employees may be located, unless the area where the material is dropped is guarded by fences, barricades, or other means to prevent employees from entering the area and being struck by a falling object. Signs must be posted to warn employees of any falling object hazards.

Specialized Storage Systems, Inc will implement methods for protecting workers from falling objects such as the following: canopies suspended above the work area; barricades and fences to

keep people from unsafe area; screens, guardrail systems, and toe boards to prevent materials from falling to lower levels.

Employees will follow the following guidelines to keep tools and equipment where they belong:

- If utilized, toeboards must be strong enough to withstand a force of at least 50lbs applied in any downward or outward direction and be at least 3 ½ inches high
- If material must be piled higher than the top edge of a toeboard, panels or screens must be installed to keep the material from dropping over the edge
- If canopies are used as falling object protection, ensure they will not collapse or tear from an object's impact
- Guardrails with toeboards may be used as falling object protection if the guardrails openings are small enough to keep the objects from falling through

Guardrail Systems

Specialized Storage Systems, Inc will ensure that any guardrail systems utilized consist of a top rail, midrail or other equivalent protection, and posts, and have a vertical height between 42 to 45 inches from the upper surface of the top rail to the floor, platform, runway or ramp level.

Guardrail systems can also be combined with toeboards that prevent materials from rolling off the walking/working surface.

Guardrail systems must be free of anything that might cut a worker or snag a worker's clothing. Top rails and midrails must be at least 1/4th of an inch thick to reduce the risk of hand lacerations. Steel and plastic banding cannot be used for top rails or midrails.

- Wire rope used for a top rail must be marked at least every six feet with high-visibility material
- The top rail of a guardrail must be 42 inches above the walking/working surface. The top-edge height can exceed 45 inches if the system meets all other performance criteria
- Midrails must be installed midway between the top rail and the walking/working surface unless there is an existing wall or parapet at least 21 inches high
- Screens and mesh are required when material could fall between the top rail and midrail or between the midrail and the walking/working surface
- Intermediate vertical members, when used instead of midrails between posts, must be no more than 19 inches apart
- A guardrail system must be capable of withstanding a 200-pound force applied within two inches of its top edge in any outward or downward direction
- Midrails, screens, and intermediate structural members must withstand at least 150 pounds of force applied in any downward or outward direction

SPECIALIZED STORAGE SYSTEMS, INC HSE

FALL HAZARD ASSESSMENT (PAGE 1 OF 2)

Job Name		Location	
Date Assessed	Related Operating Procedures Reviewed	Location Marked and Entry Controlled	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	
FALL HAZARD ASSESSMENT CHECKLIST			
1. Can an employee enter the area without restriction and perform work?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
2. Are fall prevention systems such as cages, guardrails, toeboards, and manlifts in place?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
3. Have slipping and tripping hazards been removed or controlled?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
4. Have visual warnings of fall hazards been installed?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
5. Can the distance a worker could fall be reduced by installing platforms, nets etc?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
6. Are any permanently installed floor coverings, gratings, hatches, or doors missing?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
7. Does the location contain any other recognized safety and or health hazards?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
8. Is the space designated as a Permit Required Confined Space?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
9. Have anchor points been designated and load tested?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
ASSESSMENT INFORMATION			
Initials	Hazard	Remarks/Recommendations	
	Total potential fall distance		
	Number of workers involved		
	Frequency of task		
	Obtainable anchor point strength		
	Required anchor point strength: (not less than 5000 lbs)		

SPECIALIZED STORAGE SYSTEMS, INC HSE

FALL HAZARD ASSESSMENT (PAGE 2 OF 2)

ADDITIONAL REQUIREMENTS					
Potential environmental conditions that could impact safety					
Initials	Condition	Remarks/Recommendations			
Possible required structural alterations					
Initials	Alteration	Remarks/Recommendations			
Possible task modification that may be required					
Initials	Task	Remarks/Recommendations			
Training requirements					
Initials	Requirement	Remarks/Recommendations			
Personal protective equipment required:					
Initials	Requirement	Remarks/Recommendations			
Comments					
<input type="checkbox"/> Approved		AUTHORIZATION			
I certify that I have conducted a Fall Hazard Assessment of the above designated location and have detailed the findings of the assessment on this form. * Further detailed on attachment: <input type="checkbox"/> YES <input type="checkbox"/> NO					
Title		Date		Time	
Name		Signature			

SPECIALIZED STORAGE SYSTEMS, INC HSE

EMPLOYEE TRAINING FOR FALL PROTECTION

Specialized Storage Systems, Inc certifies that the following employee has been trained in the understanding, knowledge, and skills necessary for the safe performance of duties assigned in areas of fall protection hazards.

_____ has demonstrated proficiency in the following areas of fall protection:

<input type="checkbox"/>	The nature of fall hazards in the work area		
<input type="checkbox"/>	The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used		
<input type="checkbox"/>	The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, personal fall restraint systems, slide guard systems, positioning devices, and other protection to be used		
<input type="checkbox"/>	The role of each employee in the safety monitoring system when this system is used		
<input type="checkbox"/>	The limitations on the use of mechanical equipment during the performance of roofing work		
<input type="checkbox"/>	The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection		
<input type="checkbox"/>	The role of employees in the fall protection work plan		
Employee Trained By		Date	
Signature of Trainer		Date	
Employee Signature		Date	

cc: Employee Personnel File

POLICY

Specialized Storage Systems, Inc has implemented this policy to ensure no employee is exposed to occupational gas system welding hazards.

REFERENCES

- §1510 – Code of Safe Practices
- §1536 – Ventilation Requirements for Welding, Brazing, and Cutting
- §3203 – Injury and Illness Prevention
- §4799 – Training of Operators and Instructions
- §4845 – General Precautions
- §4848 – Fire Prevention and Suppression Procedure

RESPONSIBILITIES

Employer Responsibilities

- Identifying employees who are qualified welders
- Ensuring that safety inspections of the facility occur on regular basis
- Training personnel in how to perform a job hazard analysis
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Supervisor Responsibilities

- Establishing and maintaining safe and healthful working conditions
- Being familiar with gas welding safety and health hazards employees are exposed to, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures and work practices for controlling exposure to those hazards
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

Employee Responsibilities

- Not undertake a job until he/she has received instructions on how to do it properly and safely, and is authorized to perform the job
- Not undertake a job that appears to be unsafe
- Mechanical safeguards must always be in place and kept in place
- Report to a superior or designated individual all unsafe conditions
- Personal Protective Equipment (PPE) must be used when and where required, and properly maintained

TRAINING

It is the determination of Specialized Storage Systems, Inc to ensure employees in charge of the oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems are instructed for this work before being left in charge. Rules and instructions covering the operation and maintenance of oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems will be readily available

Documentation of qualifications shall be maintained in departmental personnel files. Documentation shall include records of academic courses, experience, on the job training, safety courses, and task related certification. The employer shall document that each employee has received the training. This documentation shall be made when the employee demonstrates proficiency in the work practices involved and shall be maintained for the duration of the employee's employment. The documentation shall contain the content of the training, each employee's name, and dates of training.

Specialized Storage Systems, Inc requires retraining when workplace changes necessitate safety-related work practices that are different from what the employee normally uses. Different work practices may be new technology, types of equipment or changes in procedures. Retraining shall be performed at least every three years.

SAFE PRACTICES

- Welding fuel-gas cylinders must be placed with valve end up whenever they are in use. Liquefied gases must be stored and shipped with the valve end up. Nothing is allowed to be placed on top of an acetylene cylinder when in use which may damage the safety device or interfere with the quick closing of the valve
- Cylinders must be handled carefully
- NOTE: Rough handling, knocks, and falls are liable to damage the cylinder, valve or safety devices and result in leakage
- Before connecting a regulator to a cylinder valve the valve must be opened slightly and closed immediately. (This action is generally termed "cracking" and is intended to clear the valve of dust or dirt that might otherwise enter the regulator). The valve must be opened while standing to one side of the outlet; never in front of it. A fuel-gas cylinder valve must never be opened up, cracked near other welding work or near sparks, flame, or other possible sources of ignition
- Cylinders containing oxygen or acetylene or other fuel or gas must not be taken into confined spaces
- Cylinders having leaking fuse plugs or other leaking safety devices shall be plainly tagged, and the supplier shall be promptly notified of the condition and his instructions followed. A warning shall be placed near the cylinders prohibiting any approach to them with a lighted cigarette or other source of ignition
- Cylinders will always be upright when in use and storage

Toxic Substances Used in Any Enclosed Space

Any process which might possibly generate hazardous fumes, gases, or dust to the metals involved will be suitably labeled to indicate the hazard, and appropriate measures for ventilation or respiratory protection provided to ensure that no employee is exposed to higher than permissible levels of hazardous fumes.

It is the determination of Specialized Storage Systems, Inc to ensure local exhaust ventilation is used when potentially hazardous materials are employed as base metals, fluxes, coatings, platings or filler metals. These include, but are not limited to, the following materials: beryllium, cadmium, chromium, fluorides, lead, mercury, zinc, inert gas metal-arc welding or oxygen cutting of stainless steel.

When the nature of the work is such that local exhaust ventilation is not an effective means for preventing potentially hazardous exposure levels, supplied-air respirators must be worn.

Toxic Substances Used in the Open Air

Where toxic substances such as those listed above are used, respiratory protective equipment will be provided except as otherwise specified by this section.

- In operations involving beryllium-containing base or filler metals, only supplied-air respirators shall be used
- Except for operations involving beryllium, cadmium, lead, or mercury, respiratory protective equipment is not required when natural or mechanical ventilation is sufficient to remove welding fumes from the breathing zone of the workers

Improper Use of Welding Gases

Compressed gases used for welding and cutting must not be used for ventilation purposes, comfort cooling, blowing dust from clothing, or cleaning the work area.

Precautionary Labels

Hazardous materials used in welding and cutting must bear precautionary labels.

Fire Prevention and Suppression Procedure

It is the determination of Specialized Storage Systems, Inc that whenever welding and cutting operations are to take place, the fire prevention and suppression procedures must be followed.

- Where hot work must be performed indoors or in the vicinity of fire hazards, the area will be cleared, if possible, of any and all material and equipment which may present a hazard of fire or explosion from flame, sparks, arcs, or slag
- Where fire hazards exist in the area of hot work operations which cannot be removed, they will be guarded to prevent fire, and the hot work operation will be shielded to confine the heat sparks and slag and to protect the immovable fire hazards and prevent hot materials from falling to a lower level
- Fire watchers will have fire extinguishers readily available. A fire watch will be maintained for at least a half hour after the welding or cutting operation is completed to prevent or extinguish any fire resulting from these operations
- The employee(s) assigned to fire watch will be trained in the proper use of fire extinguishers and fire prevention measures, ensure that appropriate firefighting equipment and fire extinguishers are readily available, and be responsible for sounding of fire alarms in the event of a fire which is not readily extinguishable
- All arc welding operations in occupied areas will be screened to prevent other personnel from being exposed to flash hazards

Supervisors will be responsible for inspecting work areas prior to any hot work being performed, designate precautions to be followed prior to work commencing, and assign a fire watch where advisable or required when any of the following conditions exist:

- Locations where other than a minor fire might develop
- Appreciable combustible material, in building construction or contents, closer than 35 feet to the point of operation
- Appreciable combustibles are more than 35 feet away, but are easily ignited by sparks
- Wall or floor openings within a 35-foot radius that expose combustible material in adjacent areas including concealed spaces in walls or floors
- Combustible materials are adjacent to the opposite side of metal partitions, walls, ceilings, or roofs and are likely to be ignited by conduction or radiation

POLICY

Specialized Storage Systems, Inc is committed to the safety and health of its employees. To identify and control the risks of using hazardous chemicals in the workplace, Specialized Storage Systems, Inc will develop, implement, and have in place a written hazard communication program at each workplace that describes how labels and other forms of warning, current Safety Data Sheets (SDS), and employee information will be accomplished. The written hazard communication program will be made available when requested.

REFERENCES

- §3203 – Injury and Illness Prevention Program
- §5194 – Hazard Communication
- §5203 – Carcinogen Report of Use Requirements.

RESPONSIBILITIES

Employer Responsibilities

Specialized Storage Systems, Inc is responsible for:

- Identifying hazardous materials used by employees
- Gathering identification of hazardous materials by contractors
- Ensuring that hazardous material container inspections of the facility occur on regular basis
- Training personnel in hazard communication
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

David Cali is designated as the administrator responsible for ensuring the policies and procedures in the written hazard communication program are communicated to all employees and maintained according to all applicable regulations, standards, and industry best practices.

Supervisor Responsibilities

- Establishing and maintaining safe and healthful working conditions
- Being familiar with chemical safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures and work practices for controlling exposure to those hazards
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

TRAINING

Specialized Storage Systems, Inc will provide employees and new hires at their initial assignment effective training that will include:

- Requirements of this program
- Any operations in their work area where hazardous chemicals are present
- Location of written hazard communication, listing of hazardous chemicals present and SDS
- How to detect the presence/release of hazardous chemicals by use of monitoring devices, visual appearance, or odor
- The physical and health hazards of chemicals in the work area
- Protection measures to be utilized to prevent exposure, appropriate work practices, emergency procedures, and proper PPE to be used
- Details of the hazard communication program, explanation of the labeling system and the SDS and how employees can obtain and use the appropriate hazard information.

Changes of job assignments, materials, or any non-routine tasks involving hazardous substances or conditions will require notification and/or retraining of effected employees of any new or additional hazards, hazard abatement or elimination methods, PPE, or engineering controls. Notifications and retraining will be documented with the employee name, date, description of action taken, and verification by David Cali.

SAFE PRACTICES

Chemical Inventory

A list of all known chemicals used at the workplace by will be available for review at the jobsite and in the office. Current SDS for all chemicals used in the workplace by are available to employees at the worksite from the job foreman or in the office. David Cali Will periodically review SDS to ensure they are current and any received SDS and replace all SDS with the most current updated version.

Specialized Storage Systems, Inc will maintain a current chemical inventory list of all hazardous substances known to be on the jobsite, which will be kept on each individual jobsite and at the main company office.

Labels

David Cali will ensure each container of hazardous chemicals in the workplace is labeled, tagged, or marked with the following information: identity of the hazardous chemicals, pictograms, signal word, hazard and precautionary statements, product identifier, and supplier identification.

David Cali will ensure labels or other forms of warning in English are legible and prominently displayed on the container, or readily available in the work area throughout each work shift. Hazardous product containers will be periodically checked to ensure they have an accurate and legible label

When Specialized Storage Systems, Inc has employees who do not speak English, information will be presented in a language they understand.

All containers used on the job will be labeled for content and precautions if substance contained is hazardous. Materials will be left in their manufacturer's container, returned to the container immediately after use, or any unused portion disposed of properly. If labels become illegible for any reason, a new label will be affixed containing all required precautionary information, or the material disposed of properly.

Specialized Storage Systems, Inc Hazard communication Program

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

General Policy Statement

The management of Specialized Storage Systems, Inc is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable federal and state health and safety rules and provide a safe, healthful environment for all our employees. This written hazard-communication plan is available at the following location for review by all employees:

Specialized Storage Systems, Inc Company Office
30 Sherwood Ln Ste 9
Fairfield, NJ 07004-3698

Container Labeling

- All hazardous chemical containers used at this workplace will clearly identify the chemical on the label, and include an appropriate hazard warning and the manufacturer's name and address
- All containers used on the job must be labeled for content and precautions if substance contained is hazardous. Materials will be left in their manufacturer's container where possible. When hazardous materials are transferred to other containers for ease of use, the container will be clearly marked for content, and any remaining material returned to its original manufacturer's container immediately after use
- If labels become illegible for any reason, a new label must be affixed containing all required information, or the material disposed of properly
- No container will be released for use until this information is verified. David Cali will ensure that all containers are labeled with a copy of the original manufacturer's label or a label that has the appropriate identification and hazard warning

Safety Data Sheets

SDS of all hazardous chemicals at the workplace are readily available to all Specialized Storage Systems, Inc employees to review. SDS are kept with the hazard communication plan at the office. The SDS are updated and managed by David Cali. If a SDS is not available for a hazardous chemical, before use, notify David Cali.

Prior to purchasing new products, David Cali will review the SDS sheets to determine if the product carries carcinogens or other extremely hazardous chemicals. If a potential carcinogen or other extremely hazardous chemical is to be used, David Cali will inform employees of the hazards, safe usage, and proper handling techniques.

Employee Training

New workers will get hazard communication training on the following before they start work.

- An overview of the requirements in Cal OSHA §5194 – Hazard Communication and §5203 – Carcinogen Report of Use Requirements
- Hazardous chemicals in their workplace
- The written hazard-communication plan, and where it may be reviewed
- Physical and health effects of the hazardous chemical
- Methods that determined the presence or release of hazardous chemicals in the area.
- How to reduce or prevent exposure chemicals through controls and PPE
- Steps we have taken to reduce or prevent exposure to these chemicals
- Emergency procedures to follow if an employee is exposed to these chemicals
- How to read labels and review Safety Data Sheets

After attending the training, each employee will sign a company training form verifying that they understand the above topics and how the topics are related to our hazard-communication plan. The training will be documented, including a brief description of the training, the trainer's name, and retrained. Documentation will be kept for 1 year.

Hazardous Non-Routine Tasks

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

Task:	Hazard:

Hazardous Chemicals in Pipes, Closed, or Hidden Systems

Before working in areas where hazardous chemicals are transferred through pipes or where pipes are insulated with asbestos-containing material, employees will contact _____ for the following information:

- The chemicals in the pipes
- The physical or health effects of the chemicals or the asbestos insulation
- The safe work practices to prevent exposure

Notification of Contractors

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

- The identity of the chemicals, how to review Safety Data Sheets, and an explanation of the container and pipe labeling system
- Safe work practices to prevent exposure

This person will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace to which an employee of Specialized Storage Systems, Inc may be exposed.

HAZARD COMMUNICATION IN THE WORKPLACE

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

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

The Hazard Communication Process

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

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

Definition of a Hazardous Chemical

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

Chemicals that are physical hazards

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

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

Chemicals that are health hazards

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

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

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

HOW TO DETERMINE WHETHER A CHEMICAL IS HAZARDOUS

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

- OSHA Division 2, Subdivision Z safety and health rules, Toxic and Hazardous Substances; Division 3, Subdivision Z, Toxic and Hazardous Substances (Construction); Division 4, Subdivision Z, Chemical/Toxins (Agriculture)
- Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment (latest edition). Published by the American Conference of Industrial Hygienists (ACGIH)
- The Registry of Toxic Effects of Chemical Substances, published by the National Institute for Occupational Safety and Health (NIOSH)
- The chemical is listed in Cal/OSHA §5203 – Carcinogen Report of Use Requirements.
- The container label of the product will issue a warning of hazardous effects.

Commonly used hazardous chemicals

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

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

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

USING SAFETY DATA SHEETS

A Safety Data Sheet contains detailed information about a hazardous chemical product's health effects, physical and chemical characteristics, and safe practices for using it.

Responsibilities of chemical manufacturers, importers, and distributors

Chemical manufacturers and importers must prepare a Safety Data Sheet for each hazardous chemical product they produce. Distributors are responsible for ensuring that you have a Safety Data Sheet for each hazardous chemical product they sell to you.

What to do if you use hazardous chemical products at your workplace

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

What to do when you no longer use a hazardous chemical at your workplace

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

Information required on Safety Data Sheets

Chemical manufacturers and importers must prepare a Safety Data Sheet for each hazardous chemical product they ship to you. The following information must appear on each sheet.

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists Cal OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE)

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

*OSHA does not require these sections.

Section 16, Other information, includes the date of preparation or last revision.

Using Container Warning Labels

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

Contents of a warning label

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

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

Containers that must be labeled

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

Secondary/Portable Containers

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

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

Labels for secondary containers must include:

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

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

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

EXAMPLE OF ORIGINAL CONTAINER GHS LABEL

SAMPLE LABEL

Product Identifier

CODE _____
Product Name _____

Supplier Identification

Company Name _____
Street Address _____
City _____ State _____
Postal Code _____ Country _____
Emergency Phone Number _____

Hazard Pictograms



Signal Word
Danger

Precautionary Statements

Keep container tightly closed. Store in a cool, well-ventilated place that is locked.
Keep away from heat/sparks/open flame. No smoking.
Only use non-sparking tools.
Use explosion-proof electrical equipment.
Take precautionary measures against static discharge.
Ground and bond container and receiving equipment.
Do not breathe vapors.
Wear protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispose of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO₂) fire extinguisher to extinguish.

First Aid
If exposed call Poison Center.
If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.

Hazard Statements

Highly flammable liquid and vapor.
May cause liver and kidney damage.

Supplemental Information

Directions for Use

Fill weight: _____ Lot Number: _____
Gross weight: _____ Fill Date: _____
Expiration Date: _____

OSHA 3492-02 2012

TRAINING EMPLOYEES

Required hazard-communication training

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

- Where to find and how to read the hazard-communication plan, the list of hazardous chemicals, and Safety Data Sheets
- The operations in which hazardous chemicals are used
- The physical and health hazards of hazardous chemicals used by employees
- The meaning of warning labels on hazardous-chemical containers and on pipes that contain hazardous substances
- How to recognize emergencies involving hazardous chemicals
- How to use personal protective equipment

Label Elements Training

Specialized Storage Systems, Inc will ensure all employees know the following elements of the labels.

- Product Identifier – Including the chemical name, code number or batch number based on the manufacturer, importer or distributor's decisions
- Signal Word – The two signal words “Danger” and “Warning” indicate the hazard's severity. Within a specific hazard class only one of the words will be used. “Danger” for more severe hazards and “Warning” for less severe. Danger will always be used if one of the hazards justifies it
- Pictogram – Employees need to understand the OSHA designated pictograms to indicate a hazard category. The pictograms are a red diamond with a black hazard on a white background, and are sufficiently wide enough to be clearly visible
- Hazard Statement – The Hazard Statement describes the nature of the hazard including the degree of the hazard. The hazard statements will be specific to the hazard classification category, and the same statements will be used regardless of the chemical or who produces it
- Precautionary Statement – The precautionary statement is a phrase describing recommended measures taken to minimize or prevent effects of exposure, improper storage or handling.
- Name, address and phone number of chemical manufacturer, distributor, or importer

Employees will also be trained on how to use the labels.

- Using the labels to ensure proper storage
- Quickly locate first aid information

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

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

Safety Data Sheet (SDS) Training

- Employees will be trained on the standardized 16-section format and the type of information found in each one.
- Training will also explain how the SDS information is related to the label information.

SPECIALIZED STORAGE SYSTEMS, INC HSE

CONFIRMATION OF EMPLOYEE'S HAZARD COMMUNICATION TRAINING

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

An overview of the requirements in OSHA's hazard communication rules.

Hazardous chemicals present in the workplace.

The written hazard-communication plan.

Physical and health effects of the hazardous chemicals.

Methods to determine the presence or release of hazardous chemicals in the work area.

How to reduce or prevent exposure to these hazardous chemicals through use

Of exposure controls/work practices and personal protective equipment.

Steps we have taken to reduce or prevent exposure to these chemicals.

Emergency procedures to follow if exposed to these chemicals.

How to read labels and review Safety Data Sheets.

Note to employee:

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

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

Employee: _____ Date: _____

Trainer: _____ Date: _____

POLICY

Specialized Storage Systems, Inc has implemented this plan to ensure no employee is exposed to Heat Related Illnesses (HRI) in the workplace and will evaluate if heat could be a problem on a particular day based on temperature and humidity levels, and then implement adequate controls, methods, or procedures to reduce the risk of HRI. This policy will be available to all employees.

REFERENCES

- §3203 – Injury and Illness Prevention Program
- §3395 – Heat Illness Prevention in Outdoor Places of Employment

RESPONSIBILITIES

Employer Responsibilities

- Training personnel in heat related illnesses
- Responding quickly to prevent heat related illnesses in high heat environments
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

David Cali Responsibilities

David Cali is responsible for ensuring the heat illness prevention program policies are communicated to all employees and maintained according to all applicable regulations, standards, and industry best practices.

Supervisor Responsibilities

- Establishing and maintaining safe and healthful working conditions
- Being familiar with heat when working outdoor safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures and work practices for controlling exposure to those hazards
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

Employee Responsibilities

- Drinking liquids in high heat situations
- No employees should undertake a job that appears to be unsafe
- Report all unsafe conditions

TRAINING

According to the National Institute of Occupational Safety and Health (NIOSH), heat stress training should cover the following components:

- Knowledge of heat stress hazards
- Recognition of risk factors, danger signs, and symptoms
- Awareness of first-aid procedures for, and potential health effects of, heat stroke
- Employee responsibilities in avoiding heat stress
- Dangers of using alcohol and/or drugs (including prescription drugs) in hot work environments

Employee Training

- Environmental and personal risk factors for heat illness
- Procedures for identifying, evaluating, and controlling exposures to the environmental and personal risk factors for heat illness
- Importance of frequent consumption of water (up to 4 cups per hour)
- The importance of acclimatization
- Different types of heat illness and common signs and symptoms of heat illness
- The importance of immediately reporting to the employer or designee symptoms or signs of heat illness
- Procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary
- Procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by medical service personnel
- How to provide clear and precise directions to the work site

Supervisor Training

Prior to assignment to supervision of employees working in the heat, training on the following topics will occur:

- The information provided for employee training
- Procedures the supervisor will follow to implement controls as determined by the employer
- Procedures the supervisor will follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures

All training will be documented and kept on file. The training roster will identify the names of the employees who attended the training, a brief description of what the training was on, and the supervisor's name and signature who held the training. Training on heat stress will be given on an annual basis, or as deemed necessary by management.

PROCEDURES

Heat Illness Prevention Measures include:

- Access to Water
- Access to Shade
- Weather Monitoring and Acclimatization
- High Heat Procedures
- Employee and Supervisory Training
- Written Procedures Including Emergency Response

Access to Water

- Potable drinking water must be made available at no cost to the employee
- Maintain, at all times, sufficient quantities of cool potable drinking water (i.e. enough to provide at least one quart per employee per hour for the entire shift)
- Water must be fit to drink. Water containers CANNOT be refilled from non-potable water sources (e.g. irrigation wells, sprinkler or firefighting systems)
- Take care to prevent contamination of the drinking water supplied to the workers
- Implement and maintain effective replenishment procedures when beginning the shift with smaller quantities
- Locate the water containers as close as practicable given the working conditions and layout of the worksite
- Keep it readily accessible, move it with the workers!
- Encourage the frequent drinking of water

Shade (when temperature exceeds 80 Fahrenheit)

- Maintain one or more areas of shade at all times, when employees are present
- Locate the shade as close as practical to the area where employees are working
- Provide enough shade to accommodate at least 100% of the employees on the shift at any one time. However, retain the ability to permit access to all workers that request it
- Remember: Access to shade must be permitted at all times
- Encourage employees to take a cool-down rest in the shade, for a period of no less than 5 minutes at a time
- Shaded area must not cause exposure to another health or safety hazard. Areas underneath mobile equipment (e.g. tractor), or areas that require crouching in order to sit fully in the shade are not acceptable
- Shade (when temperature below 80 Fahrenheit) - When the temperature does not exceed 80 F, provide timely access to shade upon request
- When Infeasible or Unsafe- In situations where the employer can demonstrate that it is not safe or feasible to shade upon request or, for non-agricultural employers, alternative cooling measures that provide equivalent protection

Monitor the Weather

- Instruct supervisors to track the weather of the job site [by monitoring predicted temperature highs and periodically using a thermometer]
- Determine, and instruct supervisors on, how weather information will be used to modify work schedule, increase number of water and rest breaks or cease work early if necessary

Address Lack of Acclimatization

As an employer, we are responsible for the working conditions of our employees, so we must act effectively when conditions result in sudden exposure to heat that our workers are not used to.

Thus, determine how we will:

- Lessen the intensity and/or shift length of the newly-hired employees' work during a two or more week break-in period
- Modify the work schedule or reschedule non-essential duties, during the hot summer months
- Be extra-vigilant with our employees to recognize immediately symptoms of possible heat illness

High Heat Procedures (when temperature equals or exceeds 95 F)

We will implement additional preventive measures:

- Ensure effective communication (by voice, observation or electronic means)
- Observe employees for alertness and signs and symptoms of heat illness
- Give more frequent reminders to drink plenty of water
- Closely supervise new employees, for the first 14 days

ATTACHMENTS

- Recognizing and Avoiding Heat Stress
- Heat Stress Risk Assessment Factors

RECOGNIZING AND AVOIDING HEAT STRESS (PAGE 1 OF 3)**Heat Stress in Construction**

Construction operations involving heavy physical work in hot, humid environments can put considerable heat stress on workers. Hot and humid conditions can occur either indoors or outdoors.

Outdoors	Indoors
<ul style="list-style-type: none">• Road building• Residential construction• Work on bridges• Trenching• Pouring and spreading tar or asphalt• Roofing operations• Steel Erection• Excavation and grading	<ul style="list-style-type: none">• Steel mills and foundries• Boiler rooms• Pulp and paper mills• Electrical utilities• Petrochemical plants• Smelters• Furnace operations• Oil and chemical refineries• Electrical vaults• Interior construction and renovation

Asbestos removal, work with hazardous wastes, and other operations that require workers to wear semi-permeable or impermeable protective clothing can contribute significantly to heat stress. Heat stress causes the body's core temperature to rise.

When the Body's Core Temperature Rises

The human body functions best within a narrow range of internal temperature. This "core" temperature varies from 96.8° F to 100.4° F. A construction worker performing heavy work in a hot environment builds up body heat. To get rid of excess heat and keep internal temperature below 100.4° F, the body uses two cooling mechanisms:

- The heart rate increases to move blood – and heat – from heart, lungs, and other vital organs to the skin
- Sweating increases to help cool blood and body. Evaporation of sweat is the most important way the body gets rid of excess heat

When the body's cooling mechanisms work well, core temperature drops or stabilizes at a safe level (around 98.6° F). But when too much sweat is lost through heavy labor or working under hot, humid conditions, the body does not have enough water left to cool itself. The result is dehydration. Core temperature rises above 100.4° F. A series of heat-related illnesses, or heat stress disorders, can then develop.

RECOGNIZING AND AVOIDING HEAT STRESS (PAGE 2 OF 3)

Recognizing Heat Stress Disorders

Heat stress disorders range from minor discomforts to life-threatening conditions: heat rash, heat cramps, heat exhaustion, heat strokes.

Heat Rash

Heat rash – also known as prickly heat – is the most common problem in hot work environments.

Symptoms include:

- Red blotches and extreme itchiness in areas persistently damp with sweat
- Prickling sensation on the skin where sweating occurs

Treatment — cool shaded environment, cool shower, thorough drying. In most cases, heat rashes disappear a few days after heat exposure ceases. If the skin is not cleaned frequently enough, the rash may become infected.

Heat Cramps

Under extreme conditions, such as removing asbestos from hot water pipes for several hours in heavy protective gear, the body may lose salt through excessive sweating. Heat cramps can result. These are spasms in larger muscles – usually back, leg, and arm. Cramping creates hard painful lumps within the muscles.

Treatment — shade, stretch and massage muscles; replace salt by drinking commercially available carbohydrate/electrolyte replacement fluids.

Heat Exhaustion

Heat exhaustion occurs when the body can no longer keep blood flowing to supply vital organs and send blood to the skin to reduce body temperature at the same time. Signs and symptoms of heat exhaustion include: weakness, difficulty continuing work, headache, breathlessness, nausea or vomiting, feeling faint or actually fainting.

Workers fainting from heat exhaustion while operating machinery, vehicles, or equipment can injure themselves and others.

Treatment — heat exhaustion casualties respond quickly to prompt first aid. If not treated promptly, however, heat exhaustion can lead to heat stroke—a medical emergency

- Call 911
- Help the casualty to cool off by: resting in a cool shaded place, drinking cool water, removing unnecessary clothing, loosening clothing, showering or sponging with cool water

It takes at least 30 minutes to cool the body down once a worker becomes overheated and suffers heat exhaustion.

RECOGNIZING AND AVOIDING HEAT STRESS (PAGE 3 OF 3)

Heat Stroke

Heat stroke occurs when the body can no longer cool itself and body temperature rises to critical levels.

WARNING: Heat stroke requires immediate medical attention.

The primary signs and symptoms of heat stroke are:

- Confusion
- Irrational behavior
- Loss of consciousness
- Convulsions
- Lack of sweating
- Hot, dry skin
- Abnormally high body temperature—for example, 104°F

For any worker showing signs or symptoms of heat stroke, Call 911:

- Provide immediate, aggressive, general cooling in a shaded area
- Immerse casualty in tub of cool water
- Place in cool shower
- Spray with cool water from a hose
- Wrap casualty in cool, wet sheets and fan rapidly
- Transport casualty to hospital
- Do not give anything by mouth to an unconscious casualty

WARNING — Heat stroke can be fatal even after first aid is administered. Anyone suspected of suffering from heat stroke should not be sent home or left unattended unless that action has been approved by a physician. If in doubt as to what type of heat-related disorder the worker is suffering from, call for medical assistance.

HEAT STRESS RISK ASSESSMENT FACTORS (PAGE 1 OF 3)

Factors that should be considered in assessing heat stress include: personal risk factors, environmental factors, job factors.

Personal Risk Factors

It is difficult to predict just who will be affected by heat stress and when, because individual susceptibility varies. There are, however, certain physical conditions that can reduce the body's natural ability to withstand high temperatures:

Weight – Workers who are overweight are less efficient at losing heat.

Poor physical condition – Being physically fit aids your ability to cope with the increased demands that heat places on your body.

Previous heat illnesses – Workers are more sensitive to heat if they have experienced a previous heat-related illness.

Age – As the body ages, its sweat glands become less efficient. Workers over the age of 40 may therefore have trouble with hot environments. Acclimatization to the heat and physical fitness can offset some age-related problems.

Heart disease or high blood pressure – In order to pump blood to the skin and cool the body, the heart rate increases. This can cause stress on the heart.

Recent illness – Workers with recent illnesses involving diarrhea, vomiting, or fever have an increased risk of dehydration and heat stress because their bodies have lost salt and water.

Alcohol consumption – Alcohol consumption during the previous 24 hours leads to dehydration and increased risk of heat stress.

Medication – Certain drugs may cause heat intolerance by reducing sweating or increasing urination. People who work in a hot environment should consult their physician or pharmacist before taking medications.

Lack of acclimatization – When exposed to heat for a few days, the body will adapt and become more efficient in dealing with raised environmental temperatures. This process is called acclimatization. Acclimatization usually takes 6 to 7 days.

Benefits include:

- Lower pulse rate and more stable blood pressure
- More efficient sweating (causing better evaporative cooling)
- Improved ability to maintain normal body temperatures

Acclimatization may be lost in as little as three days away from work. People returning to work after a holiday or long weekend – and their supervisors – should understand this. Workers should be allowed to gradually re-acclimatize to work conditions.

ENVIRONMENTAL FACTORS

Environmental factors such as ambient air temperature, air movement, and relative humidity can all affect an individual's response to heat. The body exchanges heat with its surroundings mainly through radiation and sweat evaporation. The rate of evaporation is influenced by humidity and air movement.

Radiant Heat

Radiation is the transfer of heat from hot objects through air to the body. Working around heat sources such as kilns or furnaces will increase heat stress. Additionally, working in direct sunlight can substantially increase heat stress. A worker is far more comfortable working at 80° F under cloudy skies than working at 80° F under sunny skies.

Humidity

Humidity is the amount of moisture in the air. Heat loss by evaporation is hindered by high humidity but helped by low humidity. As humidity rises, sweat tends to evaporate less. As a result, body cooling decreases and body temperature increases.

Air Movement

Air movement affects the exchange of heat between the body and the environment. As long as the air temperature is less than the worker's skin temperature, increasing air speed can help workers stay cooler by increasing both the rate of evaporation and the heat exchange between the skin surface and the surrounding air.

JOB FACTORS

Clothing and Personal Protective Equipment (PPE)

Heat stress can be caused or aggravated by wearing PPE such as fire - or chemical -retardant clothing. Coated and non-woven materials used in protective garments block the evaporation of sweat and can lead to substantial heat stress. The more clothing worn or the heavier the clothing, the longer it takes evaporation to cool the skin. Remember that darker clothing absorbs more radiant heat than lighter-colored clothing.

Workload

The body generates more heat during heavy physical work. For example, construction workers shoveling sand or laying brick in hot weather generate a tremendous amount of heat and are at risk of developing heat stress without proper precautions. Heavy physical work requires careful evaluation even at temperatures as low as 75° F to prevent heat disorders. This is especially true for workers who are not acclimated to the heat.

CONTROLLING HEAT STRESS

Heat stress can be controlled through education, engineering, and work procedures. Controls will:

- Protect Health – Illness can be prevented or treated while symptoms are still mild
- Improve Safety – Workers are less liable to develop a heat-related illness and have an accident. Heat stress often creeps up without warning. Many heat-induced accidents are caused by sudden loss of consciousness
- Increase Productivity – Workers feel more comfortable and are likely to be more productive as a result

POLICY

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

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

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

REFERENCES

- §3203 – Injury and Illness Prevention Program

RESPONSIBILITIES

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

Specialized Storage Systems, Inc has designated:

Safety Coordinator	David Cali
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/ Vice-chair	

SPECIALIZED STORAGE SYSTEMS, INC HSE

David Cali will assist management in the initiation, education, and execution of an effective safety program including the following:

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

Specialized Storage Systems, Inc accepts responsibility for leadership of the injury and illness program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe work conditions.

Employee Involvement and Responsibilities

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

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

TRAINING

Training is another essential element of any injury and illness prevention plan. Cal/OSHA rules require Specialized Storage Systems, Inc to train workers for any job or task they are assigned.

Our plan includes training and instruction: for all employees when they are first hired, for all new employees for each specific task, for all employees given new job assignments for which training has not already been received.

Training Documentation

The documentation of employee safety and health training will include the following elements: employee name, training dates, assigned trainer.

This documentation will be maintained for at least one (1) year.

PROCEDURES

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

Communication System

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

Supervisors/Foremen

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

- Regularly emphasizing that accident and health hazard exposure prevention are not only moral responsibilities, but also a condition of employment
- Identifying operational oversights that could contribute to accidents which often result in injuries and property damage
- Participating in safety and health related activities, including routinely attending safety meetings, reviews of the facility, and correcting employee behavior that can result in accidents and injuries
- Spending time with each person hired explaining the safety policies and the hazards of his/her particular work
- Ensuring that initial orientation of "new hires" is properly carried out
- Making sure that if a "Competent Person" is required, that one is present to oversee, and instruct employees when necessary
- Never short-cutting safety for expediency, nor allowing workers to do so
- Enforcing safety rules consistently, and following Specialized Storage Systems, Inc discipline and enforcement procedures.
- Conducting daily job-site inspections and correcting noted safety violations

Hazard Identification and Control

Periodic inspections and procedures for correction provide methods of identifying existing or potential hazards in the workplace, and eliminating or controlling them. Hazard control is essential to an effective injury and illness plan. We will be sure to look at work practices and ensure that they are being followed, and that unsafe conditions or procedures are identified and corrected properly and promptly. The inspections and procedures for correction will be documented and will be maintained for at least one (1) year. These procedures will be reevaluated:

- Whenever new substances, processes, procedures, or equipment are introduced into the workplace and present a new hazard
- Whenever new personal protective equipment or different work practices are used on existing hazards
- Whenever the Specialized Storage Systems, Inc is made aware of a new or previously unrecognized hazard
- To ensure supervisors are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed

Employees are encouraged to report possible hazardous situations, knowing their reports will be given prompt and serious attention.

Workplace equipment and personal protective equipment will be maintained in good, safe working condition.

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

Accident Incident Investigation

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

Periodic Program Evaluation

A periodic review is scheduled to look at each critical component in our injury and illness prevention plan to determine what is working well and what changes, if any, are needed. All employees are encouraged to participate by keeping Specialized Storage Systems, Inc informed of their concerns regarding the elements of this safety and health plan.

The success of this injury and illness prevention plan is dependent upon two things: First, Specialized Storage Systems, Inc must provide a safe and healthful environment in which the employee has the opportunity to work safe, and second, the employee must choose to work safe.

POLICY

This policy has been developed by Specialized Storage Systems, Inc to apply to rigging and slings in conjunction with other material handling equipment for the movement of material by hoisting.

REFERENCES

- §3203 – Injury and Illness Prevention
- §5002 – Overhead Loads
- §5042 – Slings Safe Operating Practices
- §5043 – Inspections
- §5049 – Defective Hoist or Sling Hooks and Rings

RESPONSIBILITIES

Employer Responsibilities

- Identifying hazardous materials used by employees
- Gathering identification of hazardous materials by contractors
- Ensure hazardous material container inspections of the facility occur on regular basis
- Training personnel in hazard communication
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Specialized Storage Systems, Inc Responsibilities

David Cali is designated by Specialized Storage Systems, Inc as the Competent Person in authority over all rigging and hoisting operations. David Cali will ensure that all safety measures and systems are in place, all safety procedures are adhered to, and ensure regular inspections of the operational site and rigging equipment are made.

Supervisor Responsibilities

- Establishing and maintaining safe and healthful working conditions
- Be familiar with rigging safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures and work practices for controlling exposure to those hazards
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

Employee Responsibilities

- No employee is expected to undertake a job until he/she has received instructions on how to do it properly and safely, and is authorized to perform the job
- No employees should undertake a job that appears to be unsafe
- Mechanical safeguards must always be in place and kept in place
- Employees are to report to a superior or designated individual all unsafe conditions encountered during work
- Personal protective equipment must be used when and where required, and properly maintained

TRAINING

David Cali will ensure every affected employee is provided training on sling inspection, care, and use. This training will be provided at no cost to the employee during working hours.

Specialized Storage Systems, Inc will use training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.

PROCEDURES

Inspections

Each day before use, the sling and all fastenings and attachments must be inspected for damage or defects by a qualified person. Additional inspections will be performed during sling use, where service conditions warrant. Damaged or defective slings shall be immediately removed from service.

Defective Hoist or Sling Hooks and Rings

- Deformed or defective hooks or rings must not be used
- Deformed hooks or rings must be replaced or repaired and reshaped under proper metallurgical control and proof tested
- Annealing or normalizing will be done only in accordance with the chain manufacturer's specifications
- Hooks and shackles will be used in accordance with manufacturer's recommendations
- All hooks that have no applicable manufacturer's recommendations available must be tested to twice the intended safe working load before they are initially put into use. The company will maintain and keep readily available a certification record which includes the date of the test, the signature of the person who performed the test, and an identifier of the hook which was tested
- Special custom design grabs, hooks, clamps, or other lifting accessories for such units as modular panels, prefabricated structures and similar materials, shall be marked to indicate the safe working loads and shall be proof-tested to 125 percent of the rated load prior to use
- Shackles. Employers must ensure that shackles:
 - Have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load
 - Not be loaded in excess of its recommended safe working load as prescribed on the identification markings by the manufacturer
 - Not be used without affixed and legible identification markings

Safe Operating Practices

Whenever any sling is used, the following practices will be followed:

- Slings that are damaged or defective shall not be used
- Chain or wire rope slings shall not be shortened with knots or bolts or other makeshift devices. Slings shall not be kinked, or knotted
- Slings shall not be loaded in excess of their rated capacities as prescribed by the sling manufacturer on the identification markings permanently affixed to the sling
- Slings used in a basket hitch shall have the loads balanced to prevent slippage
- Slings shall be set to avoid slippage
- Slings shall be padded or protected from the sharp edges of their loads
- Suspended loads shall be kept clear of all obstructions
- All employees shall be kept clear of loads about to be lifted and of suspended loads. Operations shall be conducted and the job controlled in a manner that will avoid exposure of employees to the hazard of overhead loads. Wherever loads must be passed directly over workers, occupied work spaces or occupied passageways, safety type hooks or equivalent means of preventing the loads from becoming disengaged shall be used
- Hands or fingers shall not be placed between the sling and its load while the sling is being tightened around the load. Shock loading is prohibited
- Tables S-1 and S-2 will be used to determine the maximum safe working loads of various sizes of wrought iron and alloy steel chains and chain slings, except that higher safe working loads are permissible when recommended by the manufacturer for specific, identifiable products. Proof coil steel chain, also known as common or hardware chain, or other chain not recommended for slinging or hoisting by the manufacturer, shall not be used for hoisting purposes
- Wrought iron chains in constant use shall be annealed or normalized at intervals not exceeding 6 months when recommended by the manufacturer. The chain manufacturer shall be consulted for recommended procedures for annealing or normalizing. Alloy chains shall not be annealed
- Employers shall not use slings without affixed and legible identification markings

POLICY

Specialized Storage Systems, Inc has adopted this policy for the safety of employees when working with or around operations involving compressed air.

REFERENCES

- §1910.101(a) – Compressed Gases (General Requirements)
- §1910.169(b)(2),(3)(i),(iv) – Air Receivers
- §1910.242(b) – Hand and Portable Powered Tools and Equipment, General
- §1926.302(b)(4) – Power-Operated Hand Tools
- Stop Work Authority Policy

RESPONSIBILITIES

David Cali will enforce this policy.

TRAINING

All employees should be trained on the use, handling, and storage of compressed gas cylinders.

SAFE PRACTICES

Use Restrictions of Compressed Air

Specialized Storage Systems, Inc prohibits employees from utilizing compressed air for cleaning purposes with the following exceptions. Compressed air may be used for cleaning purposes only when:

- The pressure is reduced to less than 30 p.s.i.
- Note: when employees are engaging in concrete form, mill scale, and similar cleaning purposes, the 30 p.s.i. requirement does not apply
- Effective chip guarding is implemented
- Sufficient Personal Protective Equipment (PPE) is worn

PPE shall conform to the selection, use, and maintenance requirements laid out in Specialized Storage Systems, Inc's Personal Protective Equipment policy.

Inspection

Specialized Storage Systems, Inc requires all of its compressed air cylinders to be visually inspected to determine they are safe. Other inspections shall be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR Parts 171-179 and 14 CFR Part 103). Where those regulations are not applicable, inspections shall be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962.

Gauges and Valves

All safety valves, gauges, indicating/controlling devices, and other safety appliances used by Specialized Storage Systems, Inc must be constructed, located, and installed so that they cannot be rendered inoperative by any means. It is prohibited to place a valve of any type between the air receiver and its safety valve(s).

Each air receiver used by Specialized Storage Systems, Inc will be equipped with a readily visible pressure gauge, and with one or more spring-loaded safety valves. The safety valve(s) must have a total relieving capacity sufficient enough to prevent pressure in the receiver from exceeding the maximum allowable working pressure of the receiver by more than ten percent.

Specialized Storage Systems, Inc ensures that the safety valves will be tested prior to use and frequently thereafter at regular intervals to determine if they are still in good operating condition. If the valve is no longer in a good operating condition, it will be immediately removed from service and replaced as soon as practicable.

Drains and Traps

It is a requirement of Specialized Storage Systems, Inc that a drain pipe and valve must be installed at the lowest point of every air receiver to allow the removal of accumulated fluids such as oil and water. Automatic traps may be installed in addition to drain valves if deemed adequate.

Specialized Storage Systems, Inc also requires employees to open the drain valve on the receiver and completely drain it of all fluids frequently during operations to prevent excessive accumulation of liquids.

Proper Use of Cylinders

To ensure the proper use of all compressed air cylinders the following requirements must be followed:

- Valves must be closed when cylinders are not in use
- Cylinders shall not be used as rollers or supports
- Cylinders shall not be placed where they can come in contact with electrical circuits
- Cylinders must be protected from sparks, slag or flame from welding, burning or cutting operations
- Empty cylinders must be returned to designated storage areas as soon as possible after use

Proper Storage

To ensure the proper storage of cylinders:

- Cylinders must be secured at all times in such a way as to avoid them being knocked over or damaged
- Cylinders must be stored in a vertical position, not stored in hallways
- Cylinders must be segregated based upon the contents
- 20 feet should be maintained between oxidizers and flammables or firewalls erected at least 5 feet high and have a fire rating of 30 minutes
- Cylinders must be protected from damage, corrosion, sunlight, and be kept away from heat sources
- Cylinders should be capped when they are not being used

Specialized Storage Systems, Inc ensures that cylinders will be stored in well ventilated areas.

Inside of buildings, cylinders shall be stored in a well-protected, well ventilated, dry location. Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.

Storage Areas

The storage areas for full and empty cylinders must be designated and labeled.

Cylinders should be stored in definitely assigned places, away from elevators, stairs, or gangways.

Transportation

To ensure the proper transportation of cylinders: cylinders must be transported in a vertical secured position using a cylinder basket or cart, and must not be rolled; regulators should be removed and cylinders capped before movement; cylinders should not be dropped or permitted to strike violently; protective caps are not to be used to lift cylinders.

Proper Handling

To ensure the proper handling of leaking cylinders:

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

Empty Cylinders

When cylinders are no longer needed they should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as when full.

POLICY

This chapter defines the requirements for ensuring cranes and crane operators are fully competent to protect the safety of all employees. The information included here is general in nature and applies to all cranes, hoists and mobile lifting devices. Always refer to the manufacturers' information for specific requirements of the equipment being used. This policy applies to crane operators, cranes, and other material handling equipment for the movement of material by hoisting.

REFERENCES

- §1910.21-1910.32 – Walking/Working Surfaces and Fall Protection
- §1910.147 – Controlling of Hazardous Energy
- §1910.147 – App “A”- Typical minimal lockout procedures
- §1910.179 – Overhead and Gantry Cranes-Frequent Inspections
- §1910.180 – Crawler, Locomotive and Truck Cranes
- §1910.184 – Slings
- §1910.333 – Selection and use of work practices
- §1926.106 – Working over Water
- §1926.251 – Rigging Equipment for Material Handling
- §1926 Subpart CC – Cranes and Derricks in Construction
- §1926 500-503 – Fall Protection
- §1926.1400-1442 – Cranes and Derricks- Site Specific Crane Operation Plan
- §1926.1401 – Definitions & General Requirements- Assembly/Disassembly Operations
- §1926.1412 – Competent Person Daily Inspection
- §1926.1419 – Signals: General Requirements
- §1926.1420 – Signals: radio, telephone or other electronic transmission of signals
- §1926.1428 – Signal Person Qualifications
- §1926.1430 – Cranes & Training
- § 1926.1434 – Equipment Modifications
- §1926.1435 – Tower Cranes
- API RP 2D – Operation & Maintenance of Offshore Cranes
- ASME B30.5-3.12 (a) – Mobile and Locomotive Cranes
- ANSI/ASME B 30.2.0 & by incorporation reference §1910.6

EMPLOYER RESPONSIBILITIES

Specialized Storage Systems, Inc is responsible for:

- Maintaining cranes and their accessories in a condition that will not endanger an operator or other employees
- Complying with the manufacturer's specifications and limitations applicable to the operation of any and all cranes, hoists and derricks
- Obtaining all necessary permits and operator certifications for using fixed and mobile cranes. These will depend on the size and rated capacity of the crane, as well as the regulatory agency with jurisdiction (state or federal OSHA)

- Developing, implementing and managing an Overhead Material Handling (OMH) Program
- Providing training in Overhead Material Handling-Operator and Crane Crew, Rigging and Signaling
- Being knowledgeable of current overhead material handling regulations, standards, equipment, and systems
- Advising and providing guidance to managers, employees, and other departments on all managed overhead material handling program matters
- Establishing and assigning all duties and responsibilities outlined in this policy to trained competent and qualified individuals
- Establishing and implementing a preventive maintenance program based on the crane manufacturer's recommendations. Considerations include:
 - Crane Type
 - Frequency of Usage
 - Maintenance history
 - Manufacturers recommendations
- Providing or verifying that the personnel have the necessary resources to accomplish their duties and responsibilities safely
- Measuring and evaluating the effectiveness of the OMH Program by: conducting periodic program evaluations (OMH Program audits at a minimum annually) and making improvements
- Ensuring appropriate management participates in the investigation of all incidents (including near misses) related to OMH. These will seek a root cause to prevent reoccurrence.
- Ensuring that a candidate employee has adequate knowledge of, and is capable of operating cranes or derricks before designating as a crane operator
- Implementing and enforcing work practices and procedures to assure that no employee will be exposed to hazards during crane hoisting operations
- Ensuring a thorough, annual inspection of the crane/hoisting machinery is done by a government or private agency recognized by the U.S. Department of Labor (preferred)
- Ensuring that any and all rig equipment (including hooks) that fails inspection and cannot be repaired shall be destroyed and replaced

Creating a site-specific operation prior to any on-site mobile crane work. This plan will be developed by David Cali and reviewed by all involved parties. Employers-refer to the OSHA standard for site/ crane requirements.

EMPLOYEE RESPONSIBILITIES

All Company employees are expected to:

- Report to a supervisor all unsafe conditions encountered during work
- Assist in job hazard analyses and follow safe job procedures.
- Inspect equipment prior to use and ensure all safety controls are in place prior to work
- Understand the purpose of necessary PPE (personal protective equipment) for a given job, ensure it is in safe, serviceable condition and use it according to safe work practices
- Follow all safety and health policies and offer suggestions to improve safety and health in the workplace where such opportunities exist

- Follow all procedures and training
- Not undertake a job until trained and authorized to perform the job
- Undertake a job that appears to be unsafe

HAZARDS

- Struck by- loss of load (fall) due to: poor rigging practices; failed slings; failure of hook safety latch; failure of other “below the hook” rigging devices
- Untrained personnel
- Miscommunication between signal person and operator
- Lack of component inspection prior to use
- Lack of system (OMH) inspection prior to use
- Component/system failure (such as brakes)
- Lift weight in excess of Rated Load Capacity
- Swing Lifts
- Shock Loading
- Unintended load contact with fixed structures
- People working below suspended loads

SAFE PRACTICES

Operational Safety

Before operations begin, the proper safety devices shall be installed on the crane and in proper working order. If any of the safety devices such as, but not limited to: operational aids are required on all equipment, operations must not begin unless the operational aids are in proper working order; crane level indicator; boom stops; jib stops; foot pedal brake locks; horn; hydraulic stabilizer jacks (if required) must have an integral holding device/check valve; equipment on rails must have rail clamps and rail stops and are not in proper working order, the crane must be taken out of service and operation shall not continue until it's deemed in proper working order by David Cali.

Specialized Storage Systems, Inc will comply with:

- All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments
- The manufacturer's procedures, specifications and limitations applicable to the operation of all cranes and derricks.

Where manufacturer's specifications are not available, the limitations assigned to the equipment will be based on the determinations of an engineer competent in this field and those determinations will be documented and recorded. Support equipment used with cranes will not exceed their capacity, rating or scope recommended by the manufacturer.

Additionally:

- A thorough, annual inspection of the hoisting machinery will be made by a government or private agency recognized by the U.S. Department of Labor (preferred)

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- Any unsafe condition found during an inspection must be corrected by a trained and competent employee or crane Servicer before the crane is put into operation. Designated repair personnel must have a permit to operate the type of crane being serviced. Maintenance records will be kept of all repairs and replacements
- Load charts (lists of rated load capacities); recommended operating speeds; special hazard warnings; and/ or instruction; will be conspicuously posted near or on all equipment, such as the operators cab. This includes instructions or warnings visible to the operator while he is at his control station. This will include, but not be limited to:
 - A substantial and durable load-rating chart with clearly legible letters and figures will be provided with each crane and securely fixed to the crane cab in a location easily visible to the operator.
 - A list of ratings based on structural, hydraulic or other factors rather than stability
 - A list of no-load work areas
 - A work area chart for which capacities are listed in the load rating chart, i.e. over side, over rear, over front
 - Weights of auxiliary equipment, i.e. load block, jibs, boom extensions
 - A description of hoist-line reeving requirements on the chart or in operator's manual
 - Load capacity relating to corresponding boom angles and operating radii for all boom lengths, jib lengths and angles. Where optional equipment, such as outriggers or extra counterweights are provided by the manufacturer, alternate ratings are provided
 - Where structural competence limits the ratings, such information will be shown on the chart
 - The required parts of line for hoist reeving, including the size and construction of rope will be on the rating chart or in the operating manual
 - All procedures applicable to the operation of the equipment be readily available in the cab at all times
- An operator will test all controls before beginning a new shift. Any controls that do not operate properly will be adjusted or repaired before operations are begun.
- A portable dry powder fire extinguisher with at least a 5 BC rating, or higher, will be available in the cab, in the operating enclosure, or on the unit. The operator and maintenance employees will be trained in its use and care.
- The operator, or someone especially designated, will properly lubricate all working parts of the crane
- The rated load of the crane shall be plainly marked on each side of the crane, and if the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground or floor.
- Cranes will be kept clean
- Hand signals to crane and derrick operators will be those prescribed by the applicable ANSI (American National Standards Institute) standard for the type of crane in use. An illustration of the signals will be posted at the job site
- Whenever internal combustion engine powered equipment exhausts in enclosed spaces, air monitoring shall be performed with results recorded to see that employees are not exposed to unsafe levels of carbon monoxide and other toxic gases or oxygen deficient atmospheres.
- If so, engineering controls will be sought to reduce/eliminate any exposures.

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- Operating signals will follow an established standard. Whistle signals can be used where only one crane is in operation. A crane will be equipped with an audible signaling device that will be actuated before traveling without a signalperson and intermittently during travel. When moving a crane, the following signals will be used:
 - Stop, 1 audible signal
 - Go ahead, 2 audible signals
 - Back up, 3 audible signals

Cranes that have not been used during a shutdown or stored for 3 or more months will be thoroughly inspected before the crane is put back in service. David Cali shall perform daily/ frequent/ monthly/ periodic inspections prior to crane being put back in service.

- Operators will not engage in any practice that will divert their attention while operating equipment-The operator will not eat, smoke or read while operating of the crane.
- All employees will be kept clear of loads about to be lifted and of suspended loads. Suspended loads will be kept clear of all obstructions. Additionally, to prevent employees from entering hazard areas training is required for each employee assigned to work on or near the equipment and erect and maintain control lines, warning lines, railings or similar barriers to mark the boundaries of the hazard areas, unless it is not feasible. Only employees essential to the operation are permitted in the fall zone.
- If power fails during operation, an equipment operator will do all of the following:
 - Set all brakes and locking devices
 - Move all clutch or other power controls to the off or neutral position
 - Communicate with the responsible supervisor in charge of equipment operations
 - If practical, and applicable, land the load under brake control

Before closing the main switch, the operator will make sure that all controllers are in the “OFF” position until the power is again available

- Hands or fingers will not be placed between the sling and its load while the sling is being tightened around the load. A sling will not be pulled from under a load when the load is resting on it
- Shock loading is prohibited
- Before lifting loads with locomotive cranes without using outriggers, controls must be put in place to ensure that the load is prevented from being carried by the truck springs
- When using locomotive cranes, do not swing the crane into a position where a railway cars on an adjacent track may come into contact with the crane
- Never use rail clamps as a tipping restraint for a locomotive crane
- Fall protection training is required under the Fall Protection Program.
- Fall Protection training, equipment and PPE (personal protective equipment) is provided for all employees who must work on a walking/working surface with an unprotected side or edge more than 6 feet above a lower level

- A crane will not be operated with more than the designed amount of ballast or counterweight. The amount of ballast or counterweight will not be changed without authorization of the manufacturer in writing and making corresponding changes in the rating chart
- When assembling or disassembling a boom on the ground, it will be blocked to prevent dropping the boom and boom sections
- When a boom section is manually telescoped it will be positioned so through and through pinning of the cylinder eye may be accomplished and will be checked in a horizontal position
- When 2 or more cranes are used to lift a single load, one designated employee will direct the rigging, lift, and movement. Arrangements will be made prior to work start on communicating to both operators individually.
- A locomotive crane will not be rotated into a position where other rail cars on an adjacent track might strike it, except when it has been verified that cars are not moving on the adjacent track and flag protection has been provided
- Specified tire pressures will be maintained

Crane Operator Safety

Each equipment operator (designated by Specialized Storage Systems, Inc) will be responsible for those operations that are under the operator's direct control. When there is any doubt as to safety, an operator will stop operations and consult with the supervisor and a Qualified Person before continuing work.

An equipment operator will be familiar with the equipment and its proper care. If adjustments or repairs are necessary or if any defects are known, the operator will report the needed adjustments or repairs or the defects to the responsible supervisor and, upon changing shifts, notify the next operator of the defects

An operator will respond to signals only from the designated signal person using appropriate signals, except where voice communications equipment is used. Operator must comply with a STOP signal from anyone.

No loads are to be lifted over the front area (cab) of a truck mounted crane.

The operator must not leave the controls while the load is suspended, except when: the operator remains adjacent to the equipment and is not engaged in any other duties. Or if the load is to be held suspended for a period of time exceeding normal lifting operations, David Cali determines that it is safe to do so, and barricades or caution lines and notices are erected to prevent all employees from entering the fall zone.

Before leaving, the operator shall:

- Land any attached load
- Disengage clutches
- Put the controls in the off or neutral position

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- Open the main switch or stop the engine
- Engage manual locking devices, in the absence of automatic holding equipment, and secure the crane against accidental travel

Operators have the authority to stop or refuse to handle loads if they feel that the operation has safety concerns. The operations must not proceed until David Cali deems that the safety is assured.

- Before closing the switch or starting the equipment, an operator will put all controls in the off or neutral position and will make sure that all personnel are in the clear
- Whenever the operator finds the main or emergency switch open, it will not be closed, even when starting on regular duty, until it is determined that no one is on or about the crane. The crane will not be oiled or repaired unless the main switch is open (off) and LOTO (locked out-tagged out).
- A crane will not be operated with more than the designed amount of ballast or counterweight. The amount of ballast or counterweight shall not be changed without authorization of the manufacturer in writing and making changes in the rating chart.
- All necessary operator clothing and personal belongings will be stored so that they don't interfere with access or operation. Tools, oil cans, waste, extra fuses and other necessary articles will be stored in the tool box, and will not be permitted to lie loose in or about the cab
- The operator, or maintenance personnel, will properly lubricate all working parts of the crane
- Whenever the operator finds the main or emergency switch open, it will not be closed; even when starting on regular duty, until it is determined that, no one is on or near the crane. The crane will not be oiled or repaired unless the main switch is open
- When lowering a load, the operator will proceed carefully and make sure the load is under safe control
- When leaving the cage, the operator will place all controllers to the "OFF" position and open the main switch

The crane operator will be familiar with the equipment and its proper care. If adjustments or repairs are necessary or if any defects are known, the operator will report the needed adjustments or repairs or the defects to David Cali or the responsible supervisor and, upon changing shifts, notify the next operator of the defects.

- Operator avoids carrying loads over people
- No hoisting / lowering / swinging / traveling while an employee is on the load or hook
- Cranes shall not be used for side pulls except when specifically authorized by a responsible person
- Operator does not leave his position at the controls while the load is suspended.

USE OF A COMPETENT PERSON

The Competent Person (David Cali designated by Specialized Storage Systems, Inc) will have the authority over all crane and hoisting operations.

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The competent person will ensure that all safety measures and systems are in place; all safety procedures are adhered to, and make sure pre-shift, monthly and additional inspections of the crane and the operational site are conducted. David Cali must begin a visual inspection prior to each shift the equipment is used, which must be completed before or during that shift.

The inspection must consist of observation of wire ropes (running and standing) that are likely to be in use during the shift for any apparent deficiencies.

All Brakes, Hooks, Slings, and Ropes will all be inspected to certification monthly with record keeping.

David Cali will perform a daily, pre-shift, pre-use inspection of the crane as well as monthly or Periodic Inspection.

The documentation of monthly inspections must include the parts of the crane checked, the serial number (or other identifier) the results of the inspection and the name and signature of the inspector with the date of the inspection. This focus is on the brakes, crane hooks and ropes.

Inspection Records

Certification records which include the date of inspection, the signature of the person who performed the inspection and the serial number, or other identifier, of the crane which was inspected shall be made monthly on critical items in use such as brakes, crane hooks, and ropes. Records shall be kept for a minimum of 3 months per ANSI/ ASME. However, as a best practice, maintain inspection records for a year and annual inspections as well as load test data for three years as this will give a better picture for diagnosis of any issues that may come to light later and provides trend analysis.

- David Cali will inspect the crane system before each use, and during use, to make sure it's in safe operating condition. All rigging equipment and the Crane itself will be on an inspection schedule for the competent person. Any deficiencies/defective parts will be repaired or replaced (if replaced, failed equipment must be destroyed) prior to use

A thorough, annual inspection of the hoisting machinery will be made by a government or a third party, private agency recognized by the U.S. Dept. Of Labor (preferred). Specialized Storage Systems, Inc will keep all dates and results of inspections for each hoisting machine and piece of equipment.

Use of a Signal Person

An operator will respond to signals only from the employee directing a lift. However, they must obey at all times an emergency stop signal from any employee. When two or more cranes are used to lift a load, the designated signal employee will give all signals. A signal person is required when:

- The point of operation is not in full view of the operator
- The operator's view is obstructed in the direction the equipment is traveling
- Either the operator or the person handling the load determines that a signal person is needed because of site-specific safety concerns

- Where a signal person(s) is in communication with more than one crane/derrick, a system must be used for identifying the crane/derrick each signal is for.

Use of a Qualified Rigger

A trained, qualified rigger is able to rig efficiently and safely based on all the variables of the lift.

A qualified rigger shall work with the Operator, David Cali and the signal person on every lift and move. The Rigger will be part of lift planning including identify load weight, center of gravity identify the best “below the hook” rigging equipment to use for each lift such as hitches, shackles, spreaders, strong backs, hooks and latches as well as slings and rope.

A qualified rigger can also determine the safety of the lift based on load weight and center of gravity.

The rigger understands load control and the effects and impact of equipment use of tag lines, sling configuration, rope/ sling angles and rated load capacities.

Riggers will partner with and assist David Cali on equipment inspections. Riggers also work with the Signalperson(s) on each move.

INSPECTIONS

OSHA requires an operational/visual crane inspection before each shift by the Competent Person. Required crane inspections may include initial, pre-use, daily, frequent, periodic, monthly, quarterly and annual. Supporting inspection logs will be kept to satisfy the inspection requirement.

Prior to initial use, all new and altered cranes shall be tested for compliance.

Daily or Frequent Crane Inspections

- All control mechanisms for maladjustment interfering with proper operation and for excessive wear of components and contamination by lubricants or other foreign matter
- Deterioration or leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.
- All safety devices for functionality
- Lifting hooks for deformation or cracks. Hooks shall be inspected daily and monthly by the Competent Person. A hook having a crack, a throat opening of more than 15% of normal or more than 10 degree twist from the plane of an unbent hook will be replaced. Hooks must have a visual inspection daily and a monthly inspection with a certification record which includes the date of inspection, the signature of the person who performed the inspection and the serial number, or other identifier, of the hook inspected.
- Rope reeving for noncompliance with manufacturer’s recommendations
- Electrical apparatuses for malfunctioning, signs of excessive deterioration, dirt, and moisture accumulation

The following will be checked:

- Control mechanisms for wear and malfunction, each daily use
- Deterioration or leakage of air or hydraulic systems, each daily use
- Hydraulic system for oil level, each daily use
- Hydraulic hoses and fittings for leaks and deterioration
- All running ropes, each daily use
- Rope reeving in conformance with the original installation
- Electrical apparatus for malfunction, wear, dirt, and moisture accumulations
- Tires for specified pressure
- The ground conditions- It is a requirement that ground conditions must be stable, drained, and graded by a qualified grade checker prior to any crane being assembled. The same rule applies for supporting materials for the crane.
- When using supporting materials for the crane the manufacture's specifications must be followed to ensure the adequate support and degree of level are met.
- A crane will be given a visual inspection not less than monthly for functionality of safety devices

Periodic Crane Inspections

Crane inspection certification records that include the date of inspection, the signature of the person who performed the inspection, and the serial number or other identifier of the crane which was inspected, will be made monthly by the Competent Person on critical items in use such as brakes, crane hooks, ropes, structural members, and welds. This record will be kept readily available with the equipment.

- Deformed, cracked, or corroded members in the crane structure and boom, loose bolts or rivets, cracked or worn sheaves and drums, worn parts and excessive wear items
- Structural members and boom for cracks, deformation, and corrosion
- Bolts and rivets for tightness
- Sheaves, drums, pins, bearings, shafts, gears, rollers, locking and clamping devices for wear, distortion, and cracks
- Power sources for performance
- Brake & clutch system parts, linings, pawls, & ratchets for excessive wear
- Load, boom angle, and other indicators for inaccuracies over their full range
- Travel, steering, braking, and locking devices for malfunction
- Tires for wear or damage
- Radiators and oil coolers for leakage, blockage of air passages, and improper performance
- Rust on piston rods and control valves
- Oil strainers and filters for blockage

Annual Crane Inspection

Annual inspection and certification of crane shall be performed by a qualified third party as a best practice although some manufacturers require this. Inspection Records shall be maintained for 3 months. Periodic/Annual retain for 1 year. A Best Practice is to maintain all inspection records for a year, Annual Inspections for 3 years.

This inspection must include functional testing to determine that the equipment as configured in the inspection is functioning properly. If any deficiency is identified, an immediate determination must be made by a qualified person as to whether the deficiency constitutes a safety hazard or, though not yet a safety hazard, needs to be monitored in the monthly inspections.

If a qualified person determines that a deficiency is a safety hazard, the equipment must be taken out of service until it has been corrected, except when temporary alternative measures are implemented. If a qualified person determines that, though not presently a safety hazard, the deficiency needs to be monitored, the employer must ensure that the deficiency is checked in the monthly inspections.

Documentation of annual/comprehensive inspection records. The following information must be documented, maintained, and retained for a minimum of 12 months by the employer that conducts the inspection: the items checked and the results of the inspection; the name and signature of the person who conducted the inspection and the date.

Occasional and Out of Service Inspections

Cranes that have been idle for a period of more than one month, but less than six months will be given a frequent & daily inspection prior to being placed in service. Cranes which have been out of service for more than six months will be given a daily, frequent, periodic inspection before being used. Standby cranes will be inspected at least semi-annually, or more frequently if they are exposed to adverse environments.

Slings, Hooks and Shackles, Hoist Chains and Rope Inspection

All crane "below the hook" or rigging gear will be on the Competent Person's monthly schedule for inspection. Whenever any sling is used, the following safety practices will be observed:

- Slings that are damaged or defective will not be used
- Slings shall not be shortened with knots or bolts or other makeshift devices. Sling legs will not be kinked
- Slings shall not be loaded in excess of their rated capacities
- Slings will be securely attached to their loads and will be padded or protected from the sharp edges of their loads. Slings used in a basket hitch will have the loads balanced to prevent slippage
- Lifting hooks or shackles will be visually inspected before each use.

A monthly inspection with a certification record which includes the date of inspection, the signature of the person who performed the inspection, and the serial number or other identifier of the hook inspected will be made by David Cali

- Hooks or shackles with cracks, or having more than 15 percent in excess of normal throat opening, or more than 10° twist from the plane of the unbent hook will be taken out of service and replaced
- Hoist chains, including end connections, will be inspected before each use for excessive wear, twist, distorted links interfering with proper function, or stretch beyond manufacturer's recommendations.

A thorough inspection of all wire ropes in use, running and standing, will be made at least once a month. The Competent Person will keep and maintain certification records on file at Specialized Storage Systems, Inc office.

- Running ropes in continuous service will have an inspection at least once a month. The inspection will include: measurement of diameter of rope; count of broken wires in 1 lay when concentrated; end connections for broken wires; corrosion, kinking, crushing, cutting, or other conditions affecting the capability of the rope; also cracked, bent, worn, corroded, or improperly applied end connectors.
- For rope in contact with equalizer sheaves or saddles, or on sheaves where rope travel is limited, the inspection will include moving the rope from its normal position on the sheave and examining the rope at the rope contact point.
- Inspection of a non-rotating type rope will include verifying that the wires are not broken or worn within the rope.
- A rope that has been idle more than 1 month will be given a complete monthly inspection before being placed in service.

All monthly wire rope inspections will be performed by David Cali, the individual who is certified as the Competent Person for operation and inspection of overhead and gantry cranes, truck cranes, hoisting equipment, and derricks. Any deterioration, resulting in appreciable loss of original strength will be kept under observation to determine whether further use of the rope would constitute a safety hazard:

- Particular care will be taken to inspect ropes at equalizer sheaves or other sheaves where rope travel is limited, or with saddles

The inspection will be for all types of deterioration and will be performed by David Cali whose approval will be required for further use of the rope. A certification record which includes the date of inspection, the signature of the person who performed the inspection, and an identifier for the rope which was inspected will be made and kept readily available from records for one year.

Hazard Identification and Risk Assessment

Where the assessment identifies that the crane has the potential to hit and injure or pin/crush a worker against an object, the hazardous areas of the crane swing radius will be marked with warning lines or railings.

Specialized Storage Systems, Inc will ensure that David Cali conducts hazard identification and a designated risk assessment before work begins. Boundaries of the work zone must be identified by marking with flags and range limiting devices. The work zone must be defined using a 360-degree radius around the crane or the max radius of the crane.

If a mobile crane, assessment will look at the ground conditions. It is a requirement that ground conditions must be stable, drained, and graded by a qualified grade checker prior to any crane being assembled.

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The same rule applies for supporting materials for the crane. When using supporting materials for the crane the manufacture's specifications must be followed to ensure the adequate support and degree of level are met.

The employer must determine if any part of the equipment, load line, or load could get closer than 20 feet to a power line. Any overhead wire will be considered an energized line until a representative of the owner or utility has checked and indicated otherwise. Specialized Storage Systems, Inc must determine if any part of the equipment, load line, or load could get closer than 20 feet to a power line. If so, the employer must meet one of the following requirements:

- De-energize the ground. Confirm from the utility owner/operator that the power line has been de-energized and visibly grounded at the worksite
- Maintain a 20 foot clearance. Ensure that no part of the equipment, load line, or load gets closer than 20 feet to the power line
- Utilize the table below- determine the line's voltage and the minimum approach distance permitted.

Except where electrical power lines and equipment have been de-energized and visibly grounded at the point of work or where an insulating barrier, not a part of the crane has been erected, or the employee is insulated or isolated from the crane, a crane will maintain the following clearances:

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

CRANE PREVENTATIVE MAINTENANCE (PM)

Specialized Storage Systems, Inc will establish and maintain a preventative maintenance program, based upon the crane manufacturer's recommendations, under the supervision of the Competent Person, an authorized and trained employee or outside service.

- Modifications or additions as part of the PM that affect the safe operation of the equipment may not be made without the manufacturer's written approval. The original safety factor of the equipment must not be reduced if modifications or changes are made to the equipment
- Modifications or changes will be certified by a competent registered engineer. The capacity, operation and maintenance instruction plates, tags or decals will be changed accordingly to reflect any modifications or changes

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- Specialized Storage Systems, Inc will comply with the manufacturer's specifications and limitations. If specifications are not available, a competent engineer will determine the equipment's limitations, which must be documented and recorded. Attachments used with cranes must not exceed the capacity, rating, or scope recommended by the manufacturer
- Certified written operational and rated load tests will be obtained from the manufacturer and kept available with the equipment. Equipment will be re-tested after any structural repairs or modifications which may only be made by the manufacturer or a technician certified by the manufacturer
- Any unsafe condition found during an inspection must be corrected by a trained and competent employee or crane Service Company before the crane is put into operation. Designated repair personnel must have a permit to operate the type of crane being serviced. Maintenance records will be kept of all repairs and replacements

Equipment that has had modifications, additions, repairs or adjustments which affect the safe operation of the equipment must be inspected by a qualified person prior to initial use. Prior to adjustments and repairs are started, the following steps will be taken:

- The crane will be placed where it does not interfere with other operations
- Before any servicing or maintenance of equipment is done, personnel will perform proper applicable LOTO (lockout/block out/tag out) procedures and placement of "Danger" and "Out of Order" signs on the crane. Additionally, on the floor beneath or on the hook to ensure the safety of personnel performing these tasks. A "warning" or "out of order" sign will be placed at the controls, and the controls will be in the "off" position.
- The boom will be lowered to the ground or otherwise secured against dropping
- All hydraulic cylinders used for boom hoist and boom telescope on a mobile hydraulic crane will be retracted
- Hydraulic oil pressure from all hydraulic circuits will be relieved before loosening or removing hydraulic components of a mobile hydraulic crane
- The load block will be lowered to the ground or otherwise secured against dropping, except when operation is necessary for the adjustment
- After adjustments and repairs have been completed, the crane will not be returned to operations until all guards have been installed, safety devices activated, trapped air removed from the hydraulic system of a mobile hydraulic crane and maintenance equipment and warning signs or locks are removed
- Hazardous conditions identified by the inspection requirements will be corrected before operation of the crane is resumed
- Adjustments will be maintained to assure correct functioning of operating mechanisms, safety devices, control systems, power plants and brakes and clutches
- A crane or its wire rope will not be used as a ground or to carry current. The ground will be attached to the workpiece during any welding

SERVICING AND MAINTENANCE

We will keep and maintain written reports on rated load tests showing the test procedures and confirming the adequacy of any repairs or alterations. Certified production written operational and rated load tests will be obtained from the equipment manufacturer, and kept available with the equipment.

Wire Rope Inspection and Maintenance

Running wire ropes will be replaced when they show:

- 6 random broken wires in 1 rope lay or 3 broken wires in 1 strand of a rope lay
- Wear of 1/3 of the original diameter of outside individual wires
- Kinking, crushing, or bird caging
- Heat damage
- Reduction in nominal diameter of 3/64 inch for ropes to 3/4 inch, 1/16 inch for ropes 7/8 inch to 1 1/8 inch, 3/32 inch for ropes 1 1/4 inch to 1 1/2

A standing wire rope will be replaced if it has:

- More than 2 broken wires in 1 lay section beyond an end connection
- 1 broken wire at an end connection

A wire rope having more than one broken wire at a socketed fitting will be re-socketed.

Wire rope will be stored in a way that prevents damage or deterioration, and handled in a manner to prevent kinking or twisting.

Before cutting preformed rope, a seizing will be placed on each side of the cut to prevent unlaying of the strands. On non-preformed rope 7/8 inch in diameter or smaller, 2 seizing will be placed on each side of the cut, and for non-preformed rope more than 7/8 inch in diameter, 3 seizing on each side will be used.

During installation, do not drag wire rope in dirt or around sharp objects.

Lifting Devices

Chain Falls and Hoist Pullers

A chain fall or hoist puller must not be used at more than its rated capacity, which must be permanently labeled or marked on it. An accessory, such as a chain or cable used to secure or support a chain fall or hoist puller, will have a capacity of not less than the chain fall or hoist puller. An object subject to a lift or pull by a chain fall will have the capacity to absorb the lift or pull without creating a hazard to an employee in the area.

A chain fall or hoist puller must be secured to an anchorage, and the load must be attached to the chain fall or hoist puller in a manner that will prevent inadvertent disengagement. When a chain fall or hoist puller are under the tension of a load, a positive action must be required to release the tension. In addition, the chain fall or hoist puller must be visually inspected for observable defects before each shift by the employee using the tools.

A hoist puller lever handle must not be operated with an extension handle except as furnished by the manufacturer.

Cranes-Attaching and Holding a Load

A load will be attached to the hook by means of a sling or other lifting device. The hoist rope will not be wrapped around a load except when setting or removing a pole.

An operator will not load a crane beyond the rated load capacity (except for test purposes). A load that is limited by structural competence rather than by stability will be checked by the operator to determine that the weight does not exceed the rated load. Before starting to hoist, the operator will make sure:

- The hoist rope is not kinked
- The multiple part lines are not twisted around each other
- The hook is not swinging when brought over the load

No employees are permitted to pass or stand under a suspended load.

Cranes-Moving a Load

- Before moving with a load, a designated employee will determine the position to carry the load, boom location, ground conditions, travel route, speed of movement and location of overhead wires
- An operator will test the hoisting brakes before moving a near rated load by raising the load a few inches and applying the hoisting brakes. This requirement applies to both single or multiple line reeving
- A load will be secured and balanced before it is lifted more than 6 inches
- A tag line will be used when rotation of the load would be hazardous
- No sudden acceleration or deceleration of the moving load, load does not contact any obstructions, no hoisting / lowering / swinging / traveling while an employee is on the load or hook, operator avoids carrying loads over people, load and the boom shall not be lowered where there is less than two full wraps of rope on their respective drums, operator does not leave his position at the controls while the load is suspended. Load cannot contact any obstructions
- Load shall not be lowered where there is less than two full wraps of rope on the hoisting drum
- The rotational speed of a crane must not allow the center of the load to swing out beyond the radius of the point sheave in use
- Loads will not be lifted over the front area of a truck crane, unless it is within the capacity of the rating chart for the front area of the truck crane

Mobile Crane moving from one location to another:

- The boom carried in line with the direction of movement
- The superstructure secured against rotation, except when negotiating a turn with an operator in the cab or the boom on a dolly
- An empty hook restrained against movement
- A crane with or without a load will not travel with the boom at a height that would allow it to bounce back over the cab
- A crane operating at a fixed radius will have the boom-hoist pawl or other positive locking device engaged

USING OUTRIGGERS, STABILIZERS/SLINGS, HOOKS & SHACKLES

Outriggers and Stabilizers

- Outrigger number, locations, types, and type of control are in accordance with manufacturer's specifications. Outriggers are designed and operated to relieve all weight from wheels or tracks within the boundaries of the outriggers. If not, the manufacturer's specifications and operating procedures must be clearly defined.
- Outriggers and stabilizers must be fully extended or, if permitted by manufacturer procedures, deployed as specified in the load chart
- Set outriggers to remove equipment weight from the wheels, except for locomotive cranes. Outrigger floats, if used, must be attached to the outriggers, stabilizer floats, if used, must be attached to the stabilizers
- Each outrigger or stabilizer must be visible to the operator or to a signal person during extension and setting
- Place outrigger and stabilizer blocking under the float/pad of the jack or, if there is no jack, under the outer bearing surface of the outrigger or stabilizer beam. Blocking must be sufficient to sustain the loads and maintain stability and must be properly placed
- Floats or pads secured to outriggers will be used when the load to be moved at a particular radius exceeds the rated load without outriggers. A wood block used to support an outrigger will be:
 - Large enough to prevent shifting and toppling of the load
 - Strong enough to resist crushing
 - Free of knots and cracks that could affect its ability to support the load

Slings, Lifting Hooks and Shackles

Whenever any sling is used, the following safety practices will be observed:

- Slings that are damaged or defective will not be used
- Slings will not be shortened with knots or bolts or other makeshift devices. Sling legs will not be kinked
- Slings will not be loaded in excess of their rated capacities
- Slings will be securely attached to their loads and will be padded or protected from the sharp edges of their loads. Slings used in a basket hitch will have the loads balanced to prevent slippage

Refueling

- A crane fuel tank will not be refueled while the engine is running.
- When refueling is done with portable containers, the containers shall be safety cans with automatic closing caps and be labeled as approved by underwriters' laboratories, Inc., factory mutual laboratory or other nationally recognized laboratory.
- Smoking or other sources of sparks and flame will be kept at least 25 feet from a refueling operation.

Crane or Derrick Suspended Personnel Platforms

The use of a crane or derrick to hoist employees on a personnel platform is prohibited, EXCEPT when the erection, use, and dismantling of conventional means of reaching the worksite, such as a personnel hoist, ladder, stairway, aerial lift, elevating work platform or scaffold, would be more hazardous or is not possible because of structural design or worksite conditions.

In this situation, the following will be performed.

Operational Criteria

- Hoisting of the personnel platform will be performed in a slow, controlled, cautious manner with no sudden movements of the crane or derrick, or the platform.
- Load lines will be capable of supporting, without failure, at least seven times the maximum intended load, except that where rotation resistant rope is used, the lines will be capable of supporting at least ten times the maximum intended load- without failure.
- The required design factor is achieved by taking the current safety factor of 3.5 and applying the 50 % derating of the crane capacity.
- Load and boom hoist drum brakes, swing brakes, and locking devices such as pawls or dogs will be engaged when the occupied personnel platform is in a stationary working position.
- The crane will be uniformly level within 1 % of level grade and located on firm footing. Cranes equipped with outriggers will have them all fully deployed following manufacturer's specifications, insofar as applicable, when hoisting employees.
- The total weight of the loaded personnel platform and related rigging will not exceed 50 % of the rated capacity for the radius and configuration of the crane or derrick.
- Ground conditions must be stable, drained, and graded by a qualified grade checker prior to any crane being assembled. The same rule applies for supporting materials for the crane. When using supporting materials for the crane the manufacturer's specifications must be followed to ensure the adequate support and degree of level are met.
- The use of machines having live booms (booms in which lowering is controlled by a brake without aid from other devices which slow the lowering speeds) is prohibited.

Instruments and Components

- Cranes and derricks with variable angle booms will be equipped with a boom angle indicator, readily visible to the operator.
- Cranes with telescoping booms will be equipped with a device to indicate clearly to the operator, at all times, the boom's extended length or an accurate determination of the load radius to be used during the lift will be made prior to hoisting personnel.
- A positive acting device will be used which prevents contact between the load block or overhaul ball and the boom tip (anti-two-blocking device), or a system will be used which deactivates the hoisting action before damage occurs in the event of a two-blocking situation (two-block damage prevention feature).
- The load line hoist drum will have a system or device on the power train, other than the load hoist brake, which regulates the lowering rate of speed of the hoist mechanism (controlled load lowering.) Free fall is prohibited.

Personnel Platforms

- The personnel platform and suspension system will be designed by a qualified engineer or a qualified person competent in structural design.
- The suspension system will be designed to minimize tipping of the platform due to movement of employees occupying the platform.
- The personnel platform itself, except the guardrail system and personnel fall arrest system anchorages, will be capable of supporting, without failure, its own weight and at least 5x the maximum intended load. Criteria for guardrail systems and personal fall arrest system anchorages are contained the Fall Protection chapter.

Pre-lift Meeting

- A meeting attended by the crane or derrick operator, riggers, signal person(s) (if necessary for the lift), employee(s) to be lifted, and the person responsible for the task to be performed will be held to review the appropriate requirements and the procedures to be followed.
- This meeting will be held prior to the test lift at each new work location, and will be repeated for any employees newly assigned to the operation.

Platform Specifications

- Each personnel platform will be equipped with a guardrail system that meets the requirements of the Fall Protection chapter, and will be enclosed at least from the toe-board to mid-rail with either solid construction or expanded metal having openings no greater than ½" (1.27 cm)
- A grab rail will be installed inside the entire perimeter of the personnel platform. Access gates, if installed, cannot swing outward during hoisting
- Access gates, including sliding or folding gates, will be equipped with a restraining device to prevent accidental opening
- Headroom will be provided which allows employees to stand upright in the platform
- In addition to the use of hard hats, employees will be protected from falls of objects (overhead protection) on the personnel platform when employees are exposed to falling objects
- All rough edges exposed to contact by employees will be surfaced or smoothed in order to prevent injury to employees from punctures or lacerations
- All welding of the personnel platform and its components will be performed by a qualified welder familiar with weld class (typically Class "A" welds), types and material specified in the platform design
- The personnel platform will be conspicuously posted with a sign, plate or other permanent marking which indicates the weight of the platform, and its rated load capacity or maximum intended load

Rigging

- When a wire rope bridle is used to connect the personnel platform to the load line, each bridle leg will be connected to a master link or shackle in such a manner to ensure that the load is evenly divided among the bridle legs.
- Hooks on overhaul ball assemblies, lower load blocks, or other attachment assemblies will be of a type that can be closed and locked, eliminating the hook throat opening. Alternatively, an alloy anchor type shackle with a bolt, nut and retaining pin may be used.

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- Wire rope, shackles, rings, master links, and other rigging hardware must be capable of supporting, without failure, at least five times (5x) the maximum intended load applied or transmitted to that component.
- Where rotation resistant rope is used, the slings will be capable of supporting without failure at least ten times (10x) the maximum intended load.
- All eyes in wire rope slings will be fabricated with thimbles.

Bridles and associated rigging for attaching the personnel platform to the hoist line will be used only for the platform and the necessary employees, their tools and the materials necessary to do their work and will not be used for any other purpose when not hoisting personnel.

Test Lifts, Inspection, and Proof Test

A test lift with the unoccupied personnel platform loaded at least to the anticipated lift weight will be made from ground level, or any other location where employees will enter the platform to each location at which the personnel platform is to be hoisted and positioned.

This test lift will be performed immediately prior to placing personnel on the platform. The operator (and spotters) will determine that all systems, controls and safety devices are activated and functioning properly; that no interferences exist; and that all configurations necessary to reach those work locations will allow the operator to remain under the 50 % limit of the hoist's rated capacity.

Materials and tools to be used during the actual lift can be loaded in the platform for the test lift. A single test lift may be performed at one time for all locations that are to be reached from a single set up position.

The test lift will be repeated prior to hoisting employees whenever the crane or derrick is moved and set up in a new location or returned to a previously used location.

Additionally, the test lift will be repeated when the lift route is changed unless the operator determines that the route change is not significant (i.e. the route change would not affect the safety of hoisted employees.)

After the test lift, and just prior to hoisting personnel, the platform will be hoisted a few inches and inspected to ensure that it is secure and properly balanced.

Employees will not be hoisted unless the following conditions are determined to exist:

- Hoist ropes must be free of kinks
- Multiple part lines must not be twisted around each other
- The primary attachment must be centered over the platform
- The hoisting system will be inspected if the load rope is slack to ensure all ropes are properly stated on drums and in sheaves

A visual inspection of the crane or derrick, rigging, personnel platform, and the crane or derrick base support or ground will be conducted by David Cali immediately after the test lift to determine whether the testing has exposed any defect or produced any adverse effect upon any component or structure. Any defects found during inspections which create a safety hazard will be corrected before hoisting personnel.

At each job site, prior to hoisting employees on the personnel platform, and after any repair or modification, the platform and rigging will be proof tested to 125 % of the platform's rated capacity by holding it in a suspended position for five minutes with the test load evenly distributed on the platform (this may be done concurrently with the test lift).

After proof testing, David Cali will inspect the platform and rigging. Any deficiencies found will be corrected and another proof test will be conducted. Personnel hoisting will not be conducted until the proof testing requirements are satisfied.

Personnel Platform Loading

- The personnel platform will not be loaded in excess of its rated load capacity. When a personnel platform does not have a rated load capacity then the personnel platform will not be loaded in excess of its maximum intended load.
- The number of employees occupying the personnel platform will not exceed the number required for the work being performed.
- Personnel platforms will be used only for employees, their tools and the materials necessary to do their work, and will not be used to hoist only materials or tools when not hoisting personnel.
- Materials and tools for use during a personnel lift will be secured to prevent displacement. Materials and tools for use during a personnel lift will be evenly distributed within the confines of the platform while the platform is suspended.

Traveling

Hoisting of employees while the crane is traveling is prohibited, except for portal, tower and locomotive cranes, or where Specialized Storage Systems, Inc demonstrates that there is no less hazardous way to perform the work.

Under any circumstances where a crane would travel while hoisting personnel, Specialized Storage Systems, Inc will implement the following procedures to safeguard employees:

- Crane travel will be restricted to a fixed track or runway
- Travel will be limited to the load radius of the boom used during the lift
- The boom must be parallel to the direction of travel

A complete test run will be performed to test the route of travel before employees are allowed to occupy the platform. This test run can be performed at the same time as the test lift which tests the route of the lift.

If travel is done with a rubber tired-carrier, the condition and air pressure of the tires will be checked. The chart capacity for lifts on rubber will be used for application of the 50 % reduction of rated capacity.

Outriggers may be partially retracted as necessary for travel.

SAFE PRACTICES

- Employees will keep all parts of the body inside the platform during raising, lowering, and positioning. This provision does not apply to an occupant of the platform performing the duties of a signal person

- Before employees exit or enter a hoisted personnel platform that is not landed, the platform will be secured to the structure where the work is to be performed, unless securing to the structure creates an unsafe situation
- Tag lines will be used unless their use creates an unsafe condition
- The crane or derrick operator will remain at the controls at all times when the crane engine is running and the platform is occupied
- Hoisting of the personnel platform must be performed in a slow, controlled, cautious manner with no sudden movements of the equipment or the platform. Hoisting of employees will be immediately stopped upon indication of any dangerous weather conditions or other impending danger
- Employees being hoisted will remain in continuous sight of and in direct communication with the operator or signal person. In those situations where direct visual contact with the operator is not possible, and the use of a signal person would create a greater hazard for the person, direct communication alone such as by radio may be used.
- Except over water, employees occupying the personnel platform will use a body belt/harness system with lanyard appropriately attached to the lower load block or overhaul ball, or to a structural member within the personnel platform capable of supporting a fall impact for employees using the anchorage.
- No lifts will be made on another of the crane's or derrick's load-lines while personnel are suspended on a platform

PROCEDURES FOR ASSEMBLY/DISASSEMBLY OF CRANE

Employer procedures must be developed by the David Cali and satisfy specific requirements: providing adequate support and stability for all parts of the equipment, and positioning employees involved to minimize exposure to any unintended movement or collapse.

Follow all manufacturer established procedures when assembling and disassembling cranes. When assembling and disassembling a crane the manufacture's procedures and prohibitions must be followed and not deviated from in anyway.

You must follow manufacturer procedures when using synthetic slings during assembly or disassembly rigging. Synthetic slings must be protected from abrasive, sharp or acute edges and configurations that might reduce the sling's rated capacity.

All assembly/disassembly work will be supervised by an A/D (Assembly/Disassembly) Director. The A/D director must meet the criteria for both a competent person and a qualified person or be a competent person assisted by a qualified person.

Before commencing assembly/disassembly operations, the A/D director must ensure that the crew members understand all of the following: Their tasks, the hazards associated with their tasks, and the hazardous positions/locations that they need to avoid.

The A/D director must:

- Understand the applicable procedures
- Review procedures immediately prior to beginning work unless they understand the procedures and has used them before for that equipment type and configuration

- Verify all capacities of any equipment used, including rigging
- Address hazards associated with the operation, including specified areas of concern: site and ground conditions, blocking material, proper location of blocking, verifying assist crane loads, boom & jib pick points, center of gravity, stability upon pin removal, snagging, struck by counterweights, boom hoist brake failure, loss of backward stability, wind speed and weather

A Site specific Crane Plan must be developed for the site that the mobile crane will be assembled for use. It is the responsibility of the A/D director that is supervising the assembly and disassembly operation to address the hazards associated with the operation that must be addressed in the Site Specific Plan, which include:

Site and ground bearing conditions. Site and ground conditions must be adequate for safe assembly and disassembly operations and to support the equipment during assembly and disassembly

Blocking material. The size, amount, condition and method of stacking the blocking must be sufficient to sustain the loads and maintain stability

Proper location of blocking. When used to support lattice booms or components, blocking must be appropriately placed to:

- Protect the structural integrity of the equipment
- Prevent dangerous movement and collapse

Operational Safety

- Verifying assist crane loads. When using an assist crane, the loads that will be imposed on the assist crane at each phase of assembly/disassembly must be verified before assembly/disassembly begins
- Boom and jib pick points. The point(s) of attachment of rigging to a boom (or boom sections or jib or jib sections) must be suitable for preventing structural damage and facilitating safe handling of these components
- Center of gravity. The center of gravity of the load must be identified if that is necessary for the method used for maintaining stability. Where there is insufficient information to accurately identify the center of gravity, measures designed to prevent unintended dangerous movement resulting from an inaccurate identification of the center of gravity must be used
- Stability upon pin removal. The boom sections, boom suspension systems (such as gantry A-frames and jib struts), and components must be rigged or supported to maintain stability upon the removal of the pins
- Snagging. Suspension ropes and pendants must not be allowed to catch on the boom or jib connection pins or cotter pins (including keepers and locking pins)
- Struck by counterweights. The potential for unintended movement from inadequately supported counterweights and from hoisting counterweights
- Boom hoist brake failure. Each time reliance is to be placed on the boom hoist brake to prevent boom movement during assembly/disassembly, the brake must be tested prior to such reliance to determine if it is sufficient to prevent boom movement. If it is not sufficient, a boom hoist pawl, other locking device/back-up braking device, or another method of preventing dangerous movement of the boom (such as blocking or using an assist crane) from a boom hoist brake failure must be used

- Loss of backward stability. Backward stability must be verified before swinging the upper works, travel, and when attaching or removing equipment components
- Weight of components. The weight of each of the components must be readily available

Capacity Limits

It is the policy of Specialized Storage Systems, Inc that during all phases of assembly and disassembly, the rated capacity limits for loads imposed on the equipment, equipment components (including rigging), pins, lifting lugs and equipment accessories, must not be exceeded for the equipment being assembled and disassembled.

Components and Configuration

Specialized Storage Systems, Inc will ensure the selection of components and the configuration of equipment that affects the capacity or safe operation of the equipment are according to the manufacturer instructions, prohibitions, limitations, and specifications. Where these are unavailable, a registered professional engineer familiar with the type of equipment involved must approve, in writing, the selection and configuration of components.

Crane Inspection Post Assembly

Before using the completed assembly, David Cali will inspect the assembly to ensure it is configured in accordance with the manufacturer equipment criteria. If the criterion is unavailable, David Cali with the assistance of a registered professional engineer, must develop the appropriate configuration criteria and ensure they are met.

Tests for Cranes Post Assembly

- A crane, prior to initial use and after modification, will be given an operational test to insure compliance, including the following: load hoisting and lowering mechanisms; boom hoisting and lowering mechanisms; travel mechanism; safety devices; boom extension mechanisms for a mobile hydraulic crane
- A test load will not exceed 110% of the rated load at any working radius
- Results of operational tests and load tests will be maintained at the job site
- Where rerating is necessary, it will be as prescribed in ASME B30.5, "Crawler, Locomotive and Truck Crane Standard". Rerating will not be in excess of the original load rating unless a letter of approval is obtained from the manufacturer and maintained at the job site

PPE (PERSONAL PROTECTIVE EQUIPMENT)

- High Visibility Wear
- Hardhat
- Safety Glasses
- Steel Toed Safety footwear
- Gloves
- Hearing Protection

REQUIREMENTS

CRANE LOAD RATINGS

Type of Crane Mounting	Maximum Load Ratings (percent of tipping loads)
Locomotive, without outriggers:	
Booms 60 feet or less	1 85
Booms over 60 feet	1 85
Locomotive, using outriggers fully extended	80
Crawler, without outriggers	75
Crawler, using outriggers fully extended	85
Truck and wheel mounted without outriggers or using outriggers fully extended	85
¹ Unless this results in less than 30,000 pound-feet net stabilizing moment about the rail, which will be minimum with such booms.	

TRAINING

All employees must be trained on overhead material handling processes and execution. Awareness training for those who have little or no input to a rig or a move, should be made aware of crane operations. For those who have specialized jobs in support of crane operations, see below for certifications and qualifications that must be kept up to date.

Designated Crane Operator Training, Requirements and Certification

Crane operators will be determined by qualification before they are designated. Based on who have appropriate offshore experience and training which must comprise of minimum amounts of classroom sessions and hands-on training which will cover lubricating points, adjustments, and principles of crane operators, load charts, hand signals and inspections. Only the designated Company operator may operate a crane. However, before assignment as an operator of a crane, training is required in all of the following areas:

- Capabilities of the equipment and attachments
- Purpose, use, and limitations of the controls
- How to make daily inspections of the equipment
- Operating assigned equipment through the functions necessary to perform the job

A review of crane operation OSHA standards and Specialized Storage Systems, Inc rules

Employees, except trainees, will pass qualification test before operating a crane.

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Operators must pass a written examination, understand and be able to use a load chart, as well as calculate loads for the crane type.

While the OSHA operator qualification regulation does not include physical requirements for operators, ASME B30-5 and API RP 2D have established physical requirements for operators. These requirements have endorsed by several professional organizations and may be included in some state regulations. Always check with the governing authority to determine the requirements for your worksite.

The designated operator must also pass a physical prior to operation of a crane as a Company designated operator. ASME B30-5 identifies minimum physical requirements for crane operators and trainees. An employee designated to operate a crane must possess all of the following minimum physical qualifications and be examined for the qualifications at least once every 3 years:

- Have effective use of all four limbs
- Be of a height sufficient to operate the controls and to have an unobstructed view over the controls into the work area
- Have coordination between eyes, hands, and feet
- Be free of known convulsive disorders and episodes of unconsciousness
- Possession of a driver's license
- Be able to read and understand signs, labels, and instruction manuals
- They will be able to distinguish colors, regardless of position of colors, if color differential is required for operation
- Have depth perception be able to distinguish between red, yellow, and green
- Their hearing, with or without hearing aid, must be adequate
- Have vision of at least 20/30 Snellen in one eye and 20/50 in the other eye with or without glasses
- No history of disabling medical condition which may be sufficient reason for disqualification
- Qualifications for crane operators will be maintained every three years and will include medical and vision evaluations.

Specialized Storage Systems, Inc will verify that only certified employees are allowed to operate cranes. Certification is available through one of the following:

- An accredited crane operator testing organization
- An audited program provided by Specialized Storage Systems, Inc
- Have U.S. military licensing by a government authority

Crane operators will be designated based on their experience and training, which must include the minimum amounts of classroom sessions and hands-on training including lubricating points, adjustments, principles of crane operators, load charts, hand signals and inspections. Training will include use of fire extinguishers.

Crane operator qualifications must be maintained and refreshed every three years and may include vision and medical condition evaluations.

Rigging Qualifications:

The following are topics that will be covered in training with workers prior to beginning rigging operations:

- Hazards associated with rigging operations
- Role and responsibility of each rigger's assigned task
- Weight of material and equipment being hoisted
- Identifying the various shapes on the surface of equipment being hoisted
- Qualified rigger training combines classroom and exams with hands-on training. The training program will include familiarization with rigging hardware, slings and the rigging basics, along with the procedures and precautions of lifting loads and lift planning safety.
- Employees need to demonstrate proper inspection, use, selection and maintenance of loose gear such as slings, shackles and hooks. Rigging hardware can include: sheaves and blocks; hooks and latches; rings, links and swivels; shackles; turnbuckles; spreader and equalizer beams; cable drops; pad eyes, eyebolts, and other points of attachment.
- Sling training includes the sling configuration, angle, and rated load. Types of slings can include: chain, wire rope, metal mesh, natural fiber rope, synthetic fiber rope, or synthetic web.
- Employees need to know the procedures and precautions of: load control and taglines; lift planning including load weight and center of gravity; sling inspection and criteria for rejecting damaged slings; unbinding loads; proper personnel transfer and sling handling and storage.
- Basic rigging aspects like pinch points and body position, PPE, signals and communication and load stability are also part of the training.
- We shall verify that all employees are trained in and familiar with required overhead material handling safe work practices and procedures in the use of any equipment required, proper Personal Protective Equipment (PPE), and safety procedures which must be followed to safeguard personnel involved in hoisting and rigging operations or who work in the vicinity of such operations.

Signaler Qualifications:

We shall ensure that each signal person is qualified. Each signal person must:

- Know and understand the type of signals used. If hand signals are used, the signal person must know and understand the Standard Method for hand signals
- Be competent in the application of the type of signals used
- Have a basic understanding of equipment operation and limitations, including the crane dynamics involved in swinging and stopping loads and boom deflection from hoisting loads
- Demonstrate that he/she meets the requirements through an oral or written test, and through a practical test that is given by a qualified third party evaluator:
 - *Third party qualified evaluator.* The signal person has documentation from a third party qualified
 - *Employer's qualified evaluator* (not a third party). The *employer's qualified evaluator* assesses the individual, determines the individual meets the qualification requirements, and provides documentation of that determination.

Additional Training

Additional training is available and required for support operations to the Crane. This includes fall protection for anyone who must work on a surface 6 feet above the next lower surface. Specifically for employees whose work requires them to be on a walking/working surface with an unprotected side or edge more than 6 feet above a lower level

ATTACHMENTS

Please see below for the following documents:

- Crane Definitions/Inspection Items
- Site-Specific Crane Operation Plan Checklist
- Crane/Boom Inspection Report
- Recommended Hand Signals for Controlling Crane Operations

DEFINITIONS/ INSPECTION:

Boom Angle Indicator – A boom angle indicator readable for the operator station is installed accurately to indicate boom angle.

Boom Hoist Disconnect, Automatic Boom Hoist Shutoff – A boom hoist disconnect safety shutoff or hydraulic relief to automatically stop the boom hoist when the boom reaches a predetermined high angle.

Boom Stops – Shock absorbing or hydraulic type boom stops are installed in a manner to resist boom overturning.

Braking Systems – Truck cranes and self-propelled cranes mounted on rubber-tired chassis or frames must be equipped with a service brake system, secondary stopping emergency brake system and a parking brake system. Unless the owner/operator can show written evidence that such systems were not required by the standards or regulations in force at the date of manufacture and are not available from the manufacturer. The braking systems must have been inspected and tested and found to comply with applicable requirements.

Cab – Contains all crane function controls in addition to mechanical boom angle indicators, electric wipers, dash lights, warning lights and buzzers, fire extinguishers, seat belts, horn, and clear unbroken glass.

Counterweight – The counterweight must be approved and installed according to manufacturer's specifications with attachment points secured.

Crawler cranes are provided with brakes or other locking devices that effectively hold the machine stationary on level grade during the working cycle. The braking system must be capable of stopping and holding the machine on the maximum grade recommended for travel. The brakes or locks are arranged to engage or remain engaged in the event of loss of operating pressure or power.

Guarding – All exposed moving parts such as gears, chains, reciprocating or rotating parts are guarded or isolated.

High-Voltage Warning Sign – High-voltage warning signs displaying restrictions and requirements will be installed at the operator's station and at strategic locations on the crane.

Hydraulic Hoses Fittings and Tubing – Flexible hoses must be sound and show no signs of leaking at the surface or its junction with the metal and couplings.

Hoses must not show blistering or abnormal deformation to the outer covering and no leaks at threaded or clamped joints that cannot be eliminated by normal tightening or recommended procedures. There will be no evidence of excessive abrasion or scrubbing on the outer surfaces of hoses, rigid tubing, or hydraulic fittings.

Jib Boom Stops – Jib stops are restraints to resist overturning.

Leveling Indicating Device – A device or procedure for leveling the crane must be provided.

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Load Hooks and Hook Blocks – Hooks and blocks must be permanently labeled with rated capacity. Hooks and blocks are counterweighted to the weight of the overhaul line from highest hook position. Hooks must not have cracks or throat openings more than 15% of normal or twisted off center more than 10° from the longitudinal axis. All hooks used to hoist personnel must be equipped with effective positive safety catches, especially on hydraulic cranes.

Main Boom, Jib Boom, Boom Extension – Boom jibs, or extensions, must not be cracked or corroded. Bolts and rivets must be tight. Certification that repaired boom members meet manufacturers original design standard will be documented. Non-certified repaired members will not be used until recertified.

Main Hoist and Auxiliary Drums System – Drum crushing is a rope condition sometimes observed which indicates deterioration of the rope. Spooling is that characteristic of a rope which affects how it wraps onto and off a drum. Spooling is affected by the care and skill with which the first larger of wraps is applied on the drum. Manufacturer's criteria during inspection usually specify:

- Minimum number of wraps to remain on the drum
- Condition of drum grooves
- Condition of flanges at the end of drum
- Rope end attachment
- Spooling characteristics of rope
- Rope condition

Manufacturer's Operating and Maintenance Manuals – Manufacturer's operating and maintenance manuals will accompany all mobile hoisting equipment. These manuals set forth specific inspection, operation and maintenance criteria for each mobile crane and lifting capacity.

Outriggers – Outrigger number, locations, types, and type of control are in accordance with manufacturer's specifications. Outriggers are designed and operated to relieve all weight from wheels or tracks within the boundaries of the outriggers. If not, the manufacturer's specifications and operating procedures must be clearly defined. Outriggers must be visible to the operator or a signal person during extension or setting.

Power Controlled Lowering – Cranes for use to hoist personnel must be equipped for power controlled lowering operation on all hoist lines. Check clutch, chains, and sprockets for wear.

Sheaves – Sheave grooves will be smooth and free from surface defects, cracks, or worn places that could cause rope damage. Flanges must not be broken, cracked, or chipped. The bottom of the sheave groove must form a close fitting saddle for the rope being used. Lower load blocks must be equipped with close fitting guards.

Almost every wire rope installation has one or more sheaves – ranging from traveling blocks with complicated reeving patterns to equalizing sheaves where only minimum rope movement is noticed.

Swing Clearance Protection – Materials for guarding rear swing area.

Turntable/Crane Body – Make sure that the rotation point of a crane gears and rollers are free of damage, wear and properly adjusted and the components are securely locked and free of cracks or damage. The swing locking mechanism must be functional (pawl, pin) and operated in the cab.

Two-Blocking Device – Cranes with telescoping booms will be equipped with a two-blocking damage prevention feature that has been tested on-site in accordance with manufacturer's requirements. All cranes hydraulic and fixed boom used to hoist personnel must be equipped with two-blocking devices on all hoist lines intended to be used in the operation. The anti-two blocking device has automatic capabilities for controlling functions that may cause a two-blocking condition.

Wire Rope – Main hoist and auxiliary wire rope inspection will include examining for:

- Broken wires
- Excess wear
- External damage from crushing, kinking, cutting, or corrosion

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SITE-SPECIFIC CRANE OPERATION PLAN AND CHECKLIST (PAGE 1 OF 2)

Company		Job Name and Location	
Job Supervisor		Date(s) on Site	
Project Engineer		Competent Person	
Crane Operator		Competent Rigger	
SCOPE OF WORK			
<input type="checkbox"/>	Roofing	Sq. Ft.	Tons
<input type="checkbox"/>	Siding	Sq. Ft.	Tons
<input type="checkbox"/>	Decking	Sq. Ft.	Tons
<input type="checkbox"/>	General Miscellaneous	Sq. Ft.	Tons
General Description of Work			
SITE LAYOUT			YES NO
1. Has controlling contractor provided adequate access to site?			<input type="checkbox"/> <input type="checkbox"/>
2. Is laydown area firm, properly graded, well drained, and accessible?			<input type="checkbox"/> <input type="checkbox"/>
PRE-CONSTRUCTION SITE CONFERENCE			YES NO
Has a Pre-Construction Site Conference been held?			<input type="checkbox"/> <input type="checkbox"/>
Please list those attending			

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SITE-SPECIFIC CRANE OPERATION PLAN AND CHECKLIST (PAGE 2 OF 2)

SEQUENCE OF CRANE ACTIVITY	
1. Give a general sequence of Crane activities	
2. Material delivery date:	
3. How will activities be coordinated with other trades:	
CRANES	YES NO
1. Crane Type:	
2. Crane Brand:	
3. Crane Capacity:	
4. How is the site prepared for the crane?	
5. How many different locations will the crane have and where are they?	
6. What is the path for overhead loads?	
7. How will employees be notified of overhead loads?	
8. Are there any critical lifts? (75% of capacity or dual crane)	<input type="checkbox"/> <input type="checkbox"/>
8. a How many?	
9. Describe critical lifts	
10. Are lift permits attached for critical lifts?	<input type="checkbox"/> <input type="checkbox"/>
11. Are lift permits attached for all lifts over 5,000 lbs	<input type="checkbox"/> <input type="checkbox"/>

Crane Inspection Report

Use only equipment which is in safe working condition. DO NOT operate equipment if any inspected items need repair.							
				Time:	Date:		
Job Site Location:							
Operator's Name:			Supervisor's Name:				
Inspector(s) Name:			Hour Meter Reading:				
Subcontractors On-Site (List Name and Trade):							
Equipment Type:		Equipment I.D. Numbers:		Manufacturer:			
OK REPAIR N/A GENERAL SITE INFORMATION:			OK REPAIR N/A GENERAL SITE INFORMATION:				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Safety Program Manual on site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazard assessment of work area?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are required OSHA Posters posted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Controls in place for identified hazards?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency Phone numbers posted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Crane swing areas signed and barricaded?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tailgate/Toolbox talks up-to-date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operator's manual on lift?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site Lift Plan completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Prelift meeting completed?
OK REPAIR N/A CARRIER VEHICLE:			OK REPAIR N/A CARRIER VEHICLE:				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Motor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cab
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Crank case oil is clean and full	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Steering
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Clutch /Converter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lights
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drive Line	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fire Extinguisher
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Transmission fluid at proper level	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Glass
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Frame	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Warning Lights
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Brakes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Differentials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Rims & Bolts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outriggers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cuts or bulges in the tires
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Engine coolant is about 2" below cap	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tires properly inflated (look on load charts for MFGR recommendations)
OK REPAIR N/A HYDRAULICS:			OK REPAIR N/A HYDRAULICS:				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Relief Valve(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hoist Motor
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Restrictor Valves	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Pumps
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Pipe Lines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bearings
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hose Lines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check hydraulic oil level
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outrigger Cylinders	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mounting Bolts
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom Hoist Cylinder	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Swing Gear
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom Crowd Cylinder	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Swing Pinion
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Control Valves	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Seals - Hydraulic
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Swing Motor				
OK REPAIR N/A BOOM:			OK REPAIR N/A BOOM:				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Shipper Welds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bearing Sheave
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom Welds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Load Block Sheave
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Pins - Boom Pivot	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Load Block Hook
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Support Roller	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom Main Section
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom Pins				
OK REPAIR N/A WEDGE SOCKETS:							
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Wire rope size and wedge socket is a proper match?				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Dead end of wire rope extends at least 9 inches beyond wedge socket?				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Dead end of the wire rope is secured properly?				

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OK	REPAIR	N/A	SHEAVES:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The wire rope is seated properly in the sheaves?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The wire rope keepers (keeps cable from coming out of the sheaves) are in good shape?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check the bolts on the sheave plates for tightness?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check for any weld cracks?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Signs of bent or buckled panels or parts?
OK	REPAIR	N/A	OPERATIONAL CHECKS:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Crane operators' logs up-to-date and on-site?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operators familiar with load charts?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Load chart is in cab?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hand signal charts on crane?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Handrails leading into crane cab are good condition?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Out riggers are extended out, working properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Out rigger pads not cracked?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outriggers extended & swing radius barricades in place?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hydraulic hoses in good condition?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The drum cable is properly spooled?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom angle indicator is available and working?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Swing through 360 degrees, does boom angle indicator stay the same throughout rotation?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does boom swing brake work properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Back-up alarm is working?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does the horn work?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Engine started, gauges are checked & working properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Crane is leveled, working properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boom up, unlock the swing break, does it swing when level?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Extend out the boom, are all sections extending evenly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Brakes & brake systems check out?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Safety pressure relief valves check out?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is equipment a safe distance from edge of trench or excavation?
OK	REPAIR	N/A	MATERIALS HANDLING:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chains and slings inspected and tagged as required?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Employees kept from under suspended loads?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Materials properly stored or stacked?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Employees using proper lifting methods?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tag lines used to guide loads?
OK	REPAIR	N/A	HOOKS – Replace If:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If hook throat opening has increased by 15%
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If load-bearing point (throat) has been worn by 10%, the hook must be replaced.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If hook tip is twisted by 10° or more, the hook must be replaced.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check for excessive damage from chemicals and for deformation and cracks.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check for and replace damaged, inoperative, or missing hook latches.

Unsafe Conditions, Situations, Acts, or Practices Observed: _____

Comments: _____

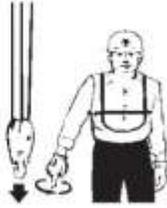
Signature (person performing inspection/evaluation if different from operator) **Date**

Operator's Signature **Date**

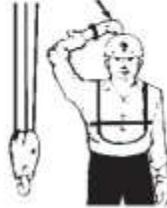
HAND SIGNALS FOR CRANE OPERATIONS



HOIST: Forearm vertical, forefinger pointing up, move hand in small horizontal circles.



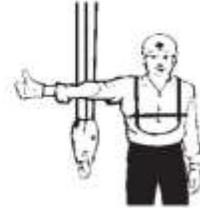
LOWER: Arm extended downward, forefinger pointing down, move hand in small horizontal circles.



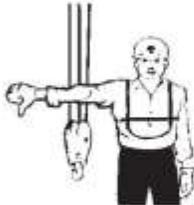
USE MAIN HOIST: Tap fist on head, then use regular signals.



USE WHIPLINE: Tap elbow with one hand, then use regular signals.



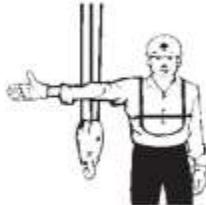
RAISE BOOM: Arm extended, fingers closed, thumb pointing upward.



LOWER BOOM: Arm extended, fingers closed, thumb pointing downward.



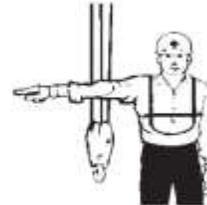
MOVE SLOWLY: One hand gives motion signal, other hand motionless in front of hand giving the motion signal.



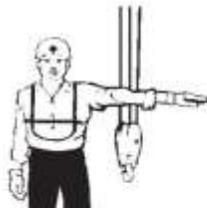
RAISE BOOM & LOWER LOAD: Arm extended, thumb pointing up, flex fingers in and out.



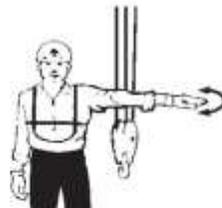
LOWER BOOM & RAISE LOAD: Arm extended, thumb pointing down, flex fingers in and out.



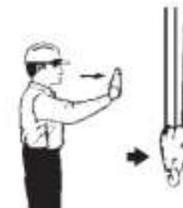
SWING: Arm extended, point with finger in direction of swing.



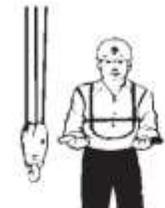
STOP: Arm extended, palm down, hold.



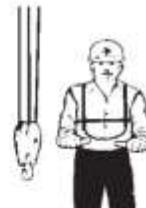
EMERGENCY STOP: Arm extended, palm down, move hand rapidly right and left.



TRAVEL: Arm extended forward, hand open and slightly raised, pushing motion in direction of travel.



EXTEND BOOM: Both fists in front of body with thumbs pointing outward.



RETRACT BOOM: Both fists in front of body with thumbs pointing toward each other.

POLICY

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

RESPONSIBILITIES

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

TRAINING

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

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

PROCEDURES

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

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

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

Safety Incentive Programs

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

Disciplinary Action

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

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

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

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

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

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

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

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

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

Employee Safety Warning Report

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

POLICY

Specialized Storage Systems, Inc has implemented this policy to inform workers of the written Driving Safety Program in the workplace. This ensures the safety and health of the employees on the job site.

RESPONSIBILITIES

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

Employer Responsibilities

- Ensuring all employees are physically fit and capable to perform the job duties assigned
- Ensuring personnel possess valid driver's licenses for the class of vehicle being driven
- Responding quickly to eliminate workplace hazards
- Ensuring all vehicles and equipment are kept in good safe working order
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness
- Ensuring the vehicles are large enough and designed for how they are used

Supervisor Responsibilities

- Establishing and maintaining safe and healthful working conditions
- Monitoring employee work behaviors using behavior based safety tools
- Ensuring employees are not impaired by illness or medication use
- Setting good examples, instructing their employees, making sure they fully understand and follow safe procedures

Employee Responsibilities;

- Notifying their supervisors if they are fatigued to the point of not being able to perform their duties safely
- Ensuring they are physically and mentally fit to perform their job functions safely; they must take responsibility for their own safety as well
- Notifying their supervisor if they are taking prescription or over-the-counter medications
- Each employee must possess a valid driver's license
- No employee should undertake a job that appears to be unsafe
- Employees are to report to a superior or designated individual all unsafe conditions encountered during work
- Seatbelts must be used by the driver and all passengers and properly maintained

SAFE PRACTICES

Driver Requirements

Specialized Storage Systems, Inc will only allow authorized employees to drive a motor vehicle in the course and scope of the work to be performed, or operate a company owned vehicle.

Each driver will be appropriately assessed, licensed, and trained to operate the company vehicle. The driver's license of each driver will be valid and kept current. All drivers will undergo a medical assessment that will be kept on file based on jurisdictional requirements.

Authorized drivers will be prohibited from operating a motor vehicle while under the influence of any of the following that might impair their driving skills:

- Alcohol
- Illegal drugs
- Prescription or over the counter medications - without prior approval

Authorized drivers will report to the appropriate personnel any of the following:

- Collision
- Traffic violation
- Near miss incident

Seat belts will be worn by all occupants at all times whenever the vehicle is in motion.

Vehicle Requirements

The company vehicle will be fit for the purposes intended, and will be maintained in a safe working order.

When transporting loads, the load will be secured, and will not exceed the manufacturers load specifications, or the legal limits for the vehicle.

Safe Driving Practices

All authorized drivers will follow safe driving practices and safe driving behaviors to include but not limited to:

- Cell phone use is prohibited while driving
- Do not manipulate radios or other equipment which may cause a distraction
- Do not exceed the posted speed limit
- Maintaining a safe distance between other vehicles
- Do not exceed the occupant capacity of the vehicle

Backing Safety

Drivers are expected to take the best available safety precautions when backing a vehicle. Large vehicles, in particular pose greater risk when backing. Safe methods include, but are not limited to:

- Spotters
- Cameras
- Proximity Detection Systems
- Tag-based Systems
- Internal Traffic Control Plans

Spotters

For vehicles with an obstructed view, the use of spotters can be an effective means in protecting employees on foot behind vehicles. However, this places the spotters at risk for injury or death. Implementing the following actions will help keep spotters safe:

- Ensure that spotters and drivers agree on hand signals before backing up
- Instruct spotters to always maintain visual contact with the driver while the vehicle is backing
- Instruct drivers to stop backing immediately if they lose sight of the spotter
- Not give spotters additional duties while they acting as spotters
- Instruct spotters not to use personal mobile phones, personal headphones, or other items which could pose a distraction during spotting activities
- Provide spotters with high visibility clothing, especially during night operations

Spotting signals:



Back up



Back, turn left



Back, turn right



Move forward



Distance left to back



Slow down



Stop

Cameras

Many newer vehicles (as well as some types of mobile equipment) can accommodate a rear-view camera to provide operators with a view of what is behind them. Viewing screens can be mounted on the dash provided they do not obstruct the field of vision out of the windshield. Construction sites or mines may require the use of more rugged camera equipment. Determining where to mount a camera for maximum effectiveness may be difficult, especially on large vehicles. For example, dump trucks may require two or three cameras to monitor the blind spots on the front, rear, and side of the vehicle.

Proximity Detection Systems

Radar and ultrasonic technology both are used in backing safety systems. A radar system transmits a signal, which is bounced off an object. The signal is then received by a receiver. These systems alert the driver with a visual and/or audio warning. These systems must be positioned so that they won't detect harmless objects, such as the concrete slab of a driveway, which can interfere with the detection of an object or person behind the vehicle or mobile equipment. Also, the composition of an object can affect detection, with some materials being virtually invisible to radar. Like cameras, this equipment can be mounted on most vehicles and may be an option from some manufacturers.

Ultrasonic systems, such as sonar, emit bursts of ultrasonic waves in a frequency above the hearing threshold of humans. When the waves strike an object, they generate echoes used to determine the distance to the object. These systems alert the driver with a visual and/or audio warning.

Tag-Based Systems

Another type of proximity detection system is an electromagnetic field-based system, which is a type of tag-based system. This system consists of electromagnetic field generators and field detecting devices. One electromagnetic field-based system uses electromagnetic field generators installed on a vehicle and electronic sensing devices (a tag) worn by persons working near the vehicle. Another electromagnetic field-based system uses field generators worn by persons working near the vehicle, with the sensing devices installed on the vehicle. These electromagnetic field-based systems can be programmed to warn affected workers, stop the vehicle, or both, when workers get within the predefined danger zone of the vehicle.

Internal Traffic Control Plans

An internal traffic control plan (ITCP) is another method used to address backover hazards. These are plans that project managers can use to coordinate the flow of moving equipment, workers, and vehicles at a worksite to minimize or eliminate vehicles and employees from crossing paths. These plans can significantly reduce, or possibly eliminate, the need for vehicles to back up on a site.

SAFE PRACTICES

This company recognizes that its greatest assets are its employees, a fact demonstrated by a commitment to their safety.

A driver safety program saves lives and reduces injuries. It also prevents material losses and helps this company guard against the range of liabilities that may emerge from a vehicular accident.

Accordingly, management will provide resources needed to support a culture of safety and will actively encourage employees to participate in planning and implementation of the driver safety program.

If the company operates any of the following types of commercial motor vehicles in interstate commerce, it will comply with applicable U.S. Department of Transportation (DOT) safety regulations, many of which may not be detailed in this chapter.

- A vehicle with a gross vehicle weight rating or gross combination weight rating (whichever is greater) of 10,001 lbs. or more
- A vehicle designed or used to transport between 9 and 15 passengers (including the driver) for compensation
- A vehicle designed or used to transport 16 or more passengers
- Any size vehicle used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act (49 U.S.C. 5101 et seq.) and which require the motor vehicle to be placarded under the Hazardous Materials Regulations (49 CFR chapter I, subchapter C)

Please see fmcsa.dot.gov or safetyservicescompany.com for more information.

FLEET

This company will maintain a fleet of vehicles if necessary for business in accordance with relevant regulatory standards and vehicle manufacturer's advice.

Fleet Selection

The safety coordinator will work with members of the safety committee and, if appropriate, this company's insurance company to establish guidelines for the selection of company vehicles, which should include the following:

- The appropriate vehicle type for expected use
- Required safety equipment
- Maintenance procedures
- Inspection procedures
- Protections against unauthorized use
- Record-keeping procedures
- Insurance

The National Highway Transportation Administration provides information on vehicle safety according to make and model.

Preventive Maintenance

All company vehicles will be maintained according to a regular schedule to ensure their safety and roadworthiness. All maintenance will be performed by a qualified individual or automotive shop according to the manufacturer's recommended service schedule.

In addition to regularly scheduled maintenance, fleet upkeep should include, but not be limited to:

- Basic inspections of the vehicle by the driver before every trip
- Immediate removal from service of any vehicle with mechanical problems
- Managerial certification of requested repairs before return to service

Recordkeeping

All vehicle maintenance, repair certification, and driver review will be recorded and kept through the life of the vehicle.

Vehicle Inspection

The operator will inspect each vehicle or piece of equipment on a daily basis before and after operation. Each operator is responsible for the safe condition of the equipment. No employee may drive a vehicle having steering, brake, or other safety problems until a mechanic has made repairs. Drivers will report any other unsafe conditions to their supervisor as soon as safely possible.

DRIVER SELECTION, QUALIFICATION AND EVALUATION

The safety coordinator will work with members of the safety committee and, if appropriate, the company's insurance company to determine the qualification standards for motor vehicle operators.

Employment History

The evaluation for any new employee anticipated to drive a company vehicle (or their own vehicle-on-company business) will include a reference check and review of driving history through past employers.

Licenses

Any driver of a company vehicle or a personal vehicle on company business will possess a valid driver's license appropriate for the vehicle that will be driven and the circumstances in which the vehicle will be driven. All government regulations and insurance company requirements will be followed concerning driver qualification.

A driver will only operate a vehicle that requires a commercial driver's license (and any endorsement) if he or she is in possession of the appropriate license.

Motor Vehicle Records

This company will check the driving records of any employee expected to drive for work. Further, periodic review of a motor vehicle record (MVR) for employees expected to drive for work reasons will indicate if they remain eligible to drive a company vehicle or their own on company business.

Initial Assignment

The company will request and review an MVR for new applicants or current employees expected to add driving to existing responsibilities, whether operating their own vehicle or a company vehicle. The MVR review will consider the most recent three years of driving and should include motor vehicle records from all states in which the applicant has lived in that time.

MVRs and the information contained therein will remain as confidential as possible. Discussions of motor vehicle records will be restricted to individuals with a legitimate "need to know".

Any qualification standard may entail a multi-tiered or point system approach to driver eligibility based on the frequency of the employee's anticipated work driving and the severity of traffic convictions recorded in the MVR

Following are some examples of violations that, having occurred in the past 3 years, may warrant ineligibility to drive on company business:

- DWI/DUI
- Negligent motor vehicle homicide
- Operating with a suspended license
- Using a motor vehicle for commission of a felony
- Aggravated assault with a motor vehicle
- Operating a motor vehicle without the owner's consent
- Reckless, careless or negligent driving, including speeding more than 15 MPH over limit
- Hit and run or leaving the scene of an accident with injury or death resulting, or property damage in excess of \$1,000

Following are examples of violations that, having occurred more than three times in two years, may warrant ineligibility to drive:

- Minor moving violations
- Accidents

Annual Review

Employees cited for a violation that may affect their eligibility to drive on company business will inform their supervisor.

In addition to the initial MVR review, a review of an employee's MVR will occur annually to confirm the driver's continued eligibility to drive for work.

Defensive Driver Training

The company may consider or require the completion of a driver safety course or defensive driving course in determining eligibility to drive a company vehicle or a personal vehicle while on company business.

Driver Agreements

Employees who will operate a motor vehicle as part of their job are required to confirm awareness and understanding of the company's driver safety policy.

The safety coordinator, with the safety committee, will create a "driver agreement" that allows a driver to confirm his or her awareness and understanding of this policy, driver expectations, vehicle maintenance and care requirements, and the procedures for reporting moving violations and accidents.

Driver Qualification File

The company will maintain a driver qualification file for every driver including all documents required to verify his or her qualifications.

Meetings

The safety coordinator, with the safety committee, will determine whether or under what conditions an employee may permit another individual to drive a company vehicle.

A driver or other employee who permits an unauthorized individual to operate a company vehicle faces disciplinary action and financial accountability for any costs incurred by allowing unauthorized personnel to operate a company vehicle.

Securing Materials

The driver will prevent the unsafe movement of any materials such as tools or equipment by securing it appropriately. Drivers should secure anything that may present a hazard outside the passenger compartment.

Vehicle Occupancy

No company vehicle transport more passengers than safely possible. Every adult in the vehicle must have a seatbelt. If children must be transported, each must have the appropriate child safety restraint. Vehicles may be operated only if each passenger is safely restrained in their seat.

Seat Belts

The company recognizes that seat belts effectively prevent injuries and loss of life in an automotive accident.

All company employees will wear seatbelts when operating a company-owned vehicle or any vehicle on company premises or on company business. Any occupant of a vehicle owned by this company, on company premises, or in a vehicle on company business will wear a seatbelt or, if required, an appropriate child restraint system.

This company encourages its employees to always wear a seatbelt when driving or riding in an automobile, to ensure child restraints are used properly, and to encourage other passengers or drivers do the same.

Alcohol and Drug Use

The company forbids employees from consuming or being under the influence of alcohol or illegal drugs during “duty hours”. Duty hours include working hours, break periods, and on-call periods. The consumption of alcohol or illegal drugs while performing company business or while in a company facility may result in disciplinary action up to and including termination.

If an employee takes prescribed medication or over-the-counter medication known to affect the ability to operate a motor vehicle or other heavy machinery, the employee will inform his or her immediate supervisor and refrain from such duties until able to do so safely.

Drivers will remain aware of driving behaviors that indicate impairment such as weaving, inappropriate speed, and erratic or abrupt driving. Staying a safe distance from drivers who may be impaired and bringing dangerous drivers to the attention of the authorities helps keep roads safe.

Drivers who operate a commercial motor vehicle as defined by the federal highway administration (FHA) must possess a CDL and are subject to FHA’s regulations on alcohol and drug use and testing.

A drug free workplace policy and supporting procedures must be in place and communicated to all employees before drug testing. The rule requires pre-employment, reasonable suspicion, random, post-accident, return-to-duty and follow-up testing. For details on the program, refer to the Federal Motor Carrier Safety Regulations, Title 49, Part 382.

Distracted Driving

Driving skills rely on the focus of the vehicle operator. Every driver will devote his or her full attention to the task of driving while behind the wheel. Text messaging while driving is strictly prohibited. Distractions come in many forms and contribute to 25 to 30 percent of all traffic accidents. Distractions include, but are not limited to the following:

- Text messaging and other cell phone use (even with hands-free headset)
- Reaching for an object inside the vehicle
- Looking at an object, person or event outside the vehicle
- Eating and drinking
- Reading
- Grooming and hygiene
- Electronics use (computer, tablet, GPS)
- Adjusting non-critical controls
- Horseplay
- Emotional distractions

Fatigued Driving

Drowsy driving greatly increases the risk of an accident. All drivers will be trained in the dangers of driving drowsy and the importance of sufficient rest before operating a motor vehicle.

Aggressive Driving

The company prohibits aggressive driving while operating a company vehicle or a personal vehicle on company business. Aggressive driving behaviors include, but are not limited to the following:

- Excessive Speed
- Tailgating
- Failure to signal lane change
- Running a red light
- Passing on the right
- Any offensive, rude, or hostile act or gesture directed at another driver

Young Drivers

Teenage drivers are the most likely to engage in risky driving behaviors, and vehicle crashes are the leading cause of death for 15-20 year olds. Federal law prohibits drivers under 17 to operate a vehicle as part of their job, and it is at the discretion of the safety coordinator to prohibit driving for any employee based on a lack of driving experience.

Driving in Work Zones

All drivers in work zones must take special care. Patience and care goes a long way to contribute to driving safely around construction. Heavy machinery and workers can slow everything down, but driving rushed makes it difficult to observe other workers and leads to poor decision making.

Workers must be vigilant and minimize distractions to respond quickly to the unexpected when behind the wheel, especially when driving where others are working.

MONITORING

As part of the our driver safety policy, every work-related accident and near miss involving motor vehicles will be handled in a way to reduce risk and encourage future safe behaviors in the future. While operating a vehicle for company purposes, drivers will have at least one mode of contact in the vehicle including, but not limited to: cell phone, CB radio, or two-way radio.

Additionally, the company's driver safety policy requires periodic review of the policy itself and its impact on the safety and health of employees.

Incident, Accident Analysis, and Reporting

If an employee experiences a vehicular accident while driving a company car or a personal car on company business, he or she will do the following:

- Stop the vehicle. If it can be done safely, move the vehicle off the road
- Call appropriate law enforcement authority if damage is done to another vehicle or property that does not belong to this company For an emergency, call 911 to summon both police and emergency medical services
- Mark the scene as necessary for safety
- Gather the names of other drivers and witnesses
- Diagram the accident, noting vehicles involved, where vehicle occupants were seated at the time of the accident, the date, time and weather conditions
- Exchange the following information with other drivers involved: License plate number, registration information and insurance information
- Document the name and badge number of the responding law enforcement professional.
- Notify the supervisor as soon as safely possible
- Cooperate with law enforcement professionals and participate in the company's accident investigation

Do not assume blame or apologize. Only give statements about what happened to police or an appropriate member of company management.

Any accident will be investigated according to the company's accident investigation policy. (See chapter on "Accident Investigation" for more details.) Use the Motor Vehicle Accident Report at the end of this chapter to accompany the company's Accident/Incident Report.

This company will comply with all recordkeeping requirements of our safety policy and any applicable regulatory authority.

Disciplinary Actions

Safety incidents involving an employee and a violation of our safety policy in a company vehicle (or personal vehicle used on company business) may result in disciplinary actions up to termination, including the revocation of driving privileges as determined by management.

Reward Program

It is at the discretion of the safety coordinator and, if appropriate, the safety committee to devise and implement a safe driver reward program to encourage safe driving habits and reward safe driving behaviors.

Policy Review

All aspects of this policy and the company's driver safety program are subject to annual review by the safety coordinator and the safety committee to ensure the effectiveness of the policy to guarantee a safe working environment for company employees.

TRAINING

This company will train every employee who will drive for work related reasons on driver safety at no cost to the employee during working hours. Training methods will include, but are not limited to, hands-on, practical exams.

The company will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

DRIVER TRAINING

The driver safety program focuses on training and prevention. All new drivers must complete an orientation to cover:

- Policies and procedures for drivers
- Governmental regulations
- Maintenance guidelines and inspection procedures
- Driver training that encourages safe, defensive road behavior

Training Components

The safety coordinator will ensure any employee at this company who drives on work business is qualified and capable to drive. Drivers will complete training in the following minimum elements for driver safety:

- Defensive driving
- Safe distances
- Intersection driving
- Poor driving conditions
- Split-second decision making
- Distracted driving
- Driving in Work Zones
- Safety restraints

Training Records

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of the employees attending the training

The company will maintain employee training records for at least 3 years from the date on which the training occurred.

FORMS & ATTACHMENTS

On the following pages, please find the following document(s):

- Motor Vehicle Accident Report
- Driver Safety Training Documentation

SPECIALIZED STORAGE SYSTEMS, INC HSE

Motor Vehicle Accident Report			
AFTER AN ACCIDENT: 1 Stay Calm 2 If the vehicles are drivable and it is safe to do so, move them safely out of traffic 3 Apply first aid (if properly trained) 4 Call police, and if necessary, ambulance 5 Take brief notes			
Vehicle Driver Name		Other Vehicle Driver Name	
Address		Address	
Phone	Driver License #	Phone	Driver License #
Vehicle Type		Other Vehicle Type	
Vehicle license Plate #		Vehicle license Plate #	
Owner's Name		Owner's Name	
Address		Address	
Vehicle Insurance Co. Name		Other Vehicle Insurance Co. Name	
Name Policy is Under	Policy #	Name Policy is Under	Policy #
Passenger Info	Passenger Info	Passenger Info	Passenger Info
ACCIDENT DETAILS			
Date of Accident		Explain how the accident happened	
Time of Accident	<input type="checkbox"/> am <input type="checkbox"/> pm		
Street			
City			
State			
Approx Speed: Your MPH:	Other MPH:	Describe your vehicle's damage	
Describe any Injuries			
		Describe other vehicle's damage	
Investigating Officer Name			
Phone	Badge No.		
Police Department			
Investigating Officer Name			
Phone	Badge No.		
Police Department			
Witness Info			
Witness Info			
Report Completed By			
Signature			

SKETCH OF THE
 ACCIDENT SCENE

POLICY

Specialized Storage Systems, Inc has designated David Cali as the administrator/supervisor for Emergency Action Plans. Specialized Storage Systems, Inc will have an Emergency Action Plan whenever an OSHA standard requires one. Emergency Action Plans will be in writing, posted in the workplace, and available to employees for review. The names and job titles of every person in the chain of command will be posted.

RESPONSIBILITIES

Specialized Storage Systems, Inc will have and maintain an employee alarm system. The employee alarm system will use a distinctive signal for each purpose.

David Cali will ensure that all employees are informed and trained in the following minimum elements for Emergency Action Plans:

- Procedures for avoiding a fire or other emergency
- Procedures for emergency evacuation for all areas of work, including type of evacuation and exit route assignments
- Safe assembly areas are designated for all work areas in the event of evacuation
- Procedures for employees who operate critical plant operations before they evacuate, if applicable
 - Suppliers who rely on the EAP of the Client, must be made aware if they have employees who are considered to be part of critical operations. If so, the Client shall make prior contractual provisions for additional Supplier employee training, tools and equipment
- Procedures to account for all employees after evacuation
- Procedures to be followed by employees performing rescue or medical duties
 - Suppliers who rely on the EAP of the Client, must be made aware of the provisions for rescue and medical services
- The members in the chain of command who may be contacted by employees who need more information about the Plan or for an explanation of their duties under the Plan

A written emergency action must be kept in the workplace, and available to employees for review, employers with 10 or fewer employees may communicate the plan orally. Suppliers who rely on the EAP of the client, must have a copy of the Client's EAP at the job site.

David Cali may be contacted by employees who need more information about the plan or an explanation of their duties under the plan. Suppliers who rely on the EAP of the Client, must be made aware of the name of the Client employee who is assigned site ownership of the EAP.

TRAINING

Specialized Storage Systems, Inc will designate and train employees to assist in a safe and orderly evacuation of other employees.

David Cali will review the Emergency Action Plan with each employee covered by the plan:

- When each Plan is developed or an employee is initially assigned to a job
- When the employee's responsibilities under the Plan change
- When any element of the Plan is changed

Fire Protection/Prevention training will be required on initial hiring and annually thereafter. All employees will be trained in the hazards involved in incipient stage firefighting and for escape purposes. Employees are instructed to ensure the local Emergency Medical Service EMS (Fire Department) is notified before attempting to extinguish any fire, and that if a fire is not immediately extinguished using one fire extinguisher, or the fire recurs to evacuate immediately.

PROCEDURES

All fire extinguishers will be inspected by David Cali on a monthly basis; this inspection will be recorded and documented with the required annual maintenance check. Records of inspection will be kept on file in the office. David Cali will ensure that all employees are trained in the proper operation of all types of fire extinguishers provided by the company.

EMERGENCY ACTION PLANS

Workplace emergencies can happen at any time and prudence dictates that response procedures must be planned and prepared for in advance. Because it is hard to think clearly during an emergency, it is essential to plan our response.

Emergency planning is the first step, and it can be challenging even if the workplace only has a few employees. Determinations must be made as to what emergencies could affect our workplace, who will lead and make decisions during an emergency, and what procedures will ensure that employees respond appropriately. These elements are the foundation of our workplace Emergency Plan.

Emergency planning may not prevent emergencies, but it can protect lives, equipment, and property over the long term. The following information in this Section describes how Specialized Storage Systems, Inc plans for workplace emergencies so that you and your coworkers respond appropriately when an unlikely event happens.

OSHA requires most employers to have Emergency Plans. Those that have more than 10 employees must have written plans. Those that have 10 or fewer employees do not have to put their plans in writing; however, they must ensure that their employees know what procedures to follow to protect themselves in an emergency.

MANAGING WORKPLACE EMERGENCIES

Much can be learned about planning for workplace emergencies from professional emergency responders. When someone calls 911 to report an emergency, he or she connects with a local network of fire, police, and other emergency service professionals who will respond as efficiently as possible. This network is part of a larger incident-management system that can respond to an emergency and accomplish the following:

- Identify, locate, and determine the extent of the emergency
- Determine the resources necessary to manage and control the emergency
- Coordinate command-and-control responsibilities between police and fire departments, hospitals and other medical service providers, government agencies, and on-site responders
- Establish and maintain communication between on-scene emergency responders and other emergency service providers
- Provide for the safety of victims

AN INCIDENT-MANAGEMENT SYSTEM FOR OUR WORKPLACE

With thoughtful planning, a small-scale version of the incident management system used by professional responders can be created. Our workplace will be ready to respond to any emergency – from a heart attack to an earthquake – and manage it in the most effective, efficient way possible. The essential parts of this system are our employees, our Emergency Action Plan, communication and emergency-response equipment, and our workplace.

The goal is for our Emergency Plan to ensure the well-being of everyone at our workplace. This is accomplished by involving employees in the ongoing planning processes, identifying emergencies that could affect our workplace, maintaining an emergency chain of command, and developing emergency response policy and procedures.

INVOLVING EMPLOYEES IN THE PLANNING PROCESS

Perhaps the most important element of emergency planning is getting employees involved in the planning process; when employees participate, they will take the Plan seriously and be more likely to respond appropriately during an emergency. From the start, they should be aware that the purpose of the plan is to ensure their safety.

- Employees will review the Plan to ensure that they know the procedures to follow to respond safely in an emergency. Each employee will have a copy of the plan or know where to obtain one
- Employees are encouraged to report workplace hazards and unsafe work practices that could contribute to an emergency

IDENTIFY EMERGENCIES THAT COULD AFFECT THE WORKPLACE

Identify any external incident (outside our workplace) that could threaten employees or the public and any incident within our workplace that could cause an emergency.

Examples include the following:

- Earthquake: external
- Explosion: external or internal
- Fire: external or internal
- Hazardous-substance release: external or internal
- Medical: internal
- Weather-related event (hurricane, tornado, blizzard, etc.): external
- Threat of violence: external or internal

Electrical, heating and cooling, and telecommunication-system failures can disrupt workplace activities and contribute to emergencies. Human error also contributes to many workplace emergencies; employees will be trained to do their jobs safely.

THE CHAIN OF COMMAND

The chain of command links one person with overall responsibility for managing an emergency to others responsible for carrying out specific emergency response tasks. A chain of command establishes who is in charge and ensures that everyone in the chain responds to emergencies in an organized way.

At the top of the chain is the incident commander, a trained employee who has overall responsibility for managing emergencies.

Just below the incident commander are the volunteer on-scene coordinators.

In an organization that has multiple buildings or workplaces, the chain of command might also include a facility manager, an emergency director, and other management units.

At many small- to medium-sized workplaces, the chain of command consists of an incident commander and one or two volunteer on-scene coordinators.

THE RESPONSIBILITIES OF THE INCIDENT COMMANDER

The incident commander has overall command of a workplace emergency, including the following responsibilities:

- Assessing incidents to determine if it is necessary to order emergency response
- Supervising on-scene coordinators' activities during an emergency
- Directing shutdown of critical workplace equipment or operations
- Coordinating the activities of professional responders such as ambulance, police, and fire departments
- Determining if an evacuation is necessary and managing an evacuation

The incident commander will be an employee who has experience managing others, assessing complex events, and making effective decisions under difficult circumstances

THE ROLE OF THE ON-SCENE COORDINATORS

On-scene coordinators are responsible for coordinating other employees' activities during an emergency (guiding them to appropriate exits and safe areas during an evacuation, for example) and for other emergency-response tasks for which they have volunteered and been properly trained.

Generally, each coordinator will be responsible for no more than 20 employees within a designated work area. On-scene coordinators must know how to respond to all emergencies identified in our Emergency Plan, the evacuation procedures for the particular workplace, and how to use emergency communication equipment. They will also know cardiopulmonary resuscitation (CPR), first aid, and how to respond to threats of violence.

Their primary responsibilities include the following:

- Checking rooms and other enclosed spaces for employees who may be trapped or unable to evacuate during an emergency
- Knowing who may need assistance during an evacuation and how to assist them
- Coordinating the emergency activities of employees
- Ensuring that employees understand how to respond to workplace emergencies
- Knowing the workplace layout, appropriate escape routes, and areas that employees must not enter during an evacuation
- Verifying that employees are in designated safe areas after an evacuation

The established chain of command minimizes confusion during an emergency. An effective chain of command helps ensure that responders manage an emergency in the most efficient way possible

RESPONDING TO EMERGENCIES

It is the policy of Specialized Storage Systems, Inc to protect employees from physical harm, harassment, and intimidation. To provide a safe working environment for all employees, Specialized Storage Systems, Inc is committed to establishing an effective Emergency Plan. The Plan is based on an "Incident Management System" (IMS) that consists of volunteer employees trained to respond to any workplace emergency. The system is modeled on the IMS system used by fire, police, and emergency medical-service responders. It provides for overall command and control of any emergency incident. It improves communication between IMS personnel and the fire, police, and medical personnel who respond to a call for help. It also provides appropriate emergency assistance during the first few minutes it takes for emergency responders to arrive.

EMERGENCY RESPONSE PROCEDURES

Emergency procedures are important because they tell employees exactly what to do to ensure their safety during an emergency to accomplish each of the following tasks:

- Report emergencies to local fire and police departments
- Inform the emergency chain of command of an emergency
- Warn employees about an emergency
- Conduct an orderly, efficient workplace evacuation
- Assist employees with disabilities or injuries during an evacuation
- Shut down critical equipment, operate fire extinguishers, and perform other essential services during an evacuation
- Account for employees at a designated safe area after an evacuation
- Perform rescue and first aid that may be necessary during an emergency

Other Critical Information

The following are included in our Company procedures:

- The names of the incident commander, the on-scene coordinators, and others responsible for carrying out the plan, and how to contact them during an emergency
- The name of the person who has the authority to order a workplace evacuation (typically, the incident commander)
- The names and phone numbers of those who understand the Emergency Plan and will inform others about it (typically the incident commander and the on-scene coordinators)

Planning Considerations—Accounting for Employees after an Evacuation

A designated meeting area a safe distance away from the emergency site will be identified in advance to ensure that employees know they must meet there after they evacuate the workplace. An on-scene coordinator should take a “Roll-Call” to identify employees not present. A determination will need to be made as to what information or assistance employees may need if they cannot return to the workplace after an evacuation.

Alerting Employees to an Emergency

The Company may use a public address system, portable radios, an alarm, an air-horn, or any other means that will reach and warn all employees. Alarms will be distinctive, be recognizable by all employees, and have a back-up power supply in case the primary power fails. We may need alarms that employees can hear and see.

Conducting Employee Rescues

It takes more than good intentions to save lives. Would-be rescuers can endanger themselves and those they are trying to rescue. During most emergencies, leave rescue work to professional responders who are appropriately trained and equipped. The exceptions would be during a catastrophe, such as a severe earthquake, that could delay professional emergency responders for hours or days. Also, jobs such as handling hazardous substances or working in confined spaces could result in emergencies for which fire or police departments are not trained. We will need to find out what kind of emergencies local responders are trained and equipped to respond to. If they are unable to respond to emergencies unique to our workplace, our employees must be trained and able to respond promptly.

Coordinating with Multi-Employer Workplaces

If we happen to share a facility, building, or worksite with other employers, we will consider working with them to develop, if feasible, a facility-wide Emergency Plan. If a facility-wide plan is not feasible, we will ensure that our plan does not conflict with the plans of the other employers in the facility.

Quick-Response Teams

A quick-response team consists of volunteer employees trained to handle workplace incidents that require immediate action, such as medical emergencies, threatening or violent people, and hazardous-substance releases. The following considerations are relevant to quick response teams:

- Types of incidents that require immediate action
- Roles and responsibilities of team members
- Communication and response procedures for the team

Training Employees about Emergencies and Evacuations

To protect themselves during an emergency, all employees must understand the following elements of the Emergency Plan:

- The roles of the incident commander and on-scene coordinators
- How to respond to threats and intimidation
- The method(s) for warning employees of emergencies
- The method for contacting employees' next of kin after an emergency
- The procedure for summoning emergency responders
- The location of safe meeting areas
- How to respond to an emergency and to an order to evacuate

New employees will be trained about the Emergency Plan when they are first hired and all employees will be informed about any changes to the plan.

On-scene coordinators will be trained in first aid and CPR, bloodborne-pathogen protection, and how to use rescue equipment.

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Regular training drills will be scheduled so that employees can practice. Outside fire and police departments will be included in the drills when possible. The effectiveness of each drill will be evaluated and activities that need strengthening will be identified. The results will be shared with all employees.

When a workplace emergency requires an evacuation, all employees must know to leave, what emergency exits to take, and where to meet. Employees may also need to know how to shut down critical equipment during an evacuation.

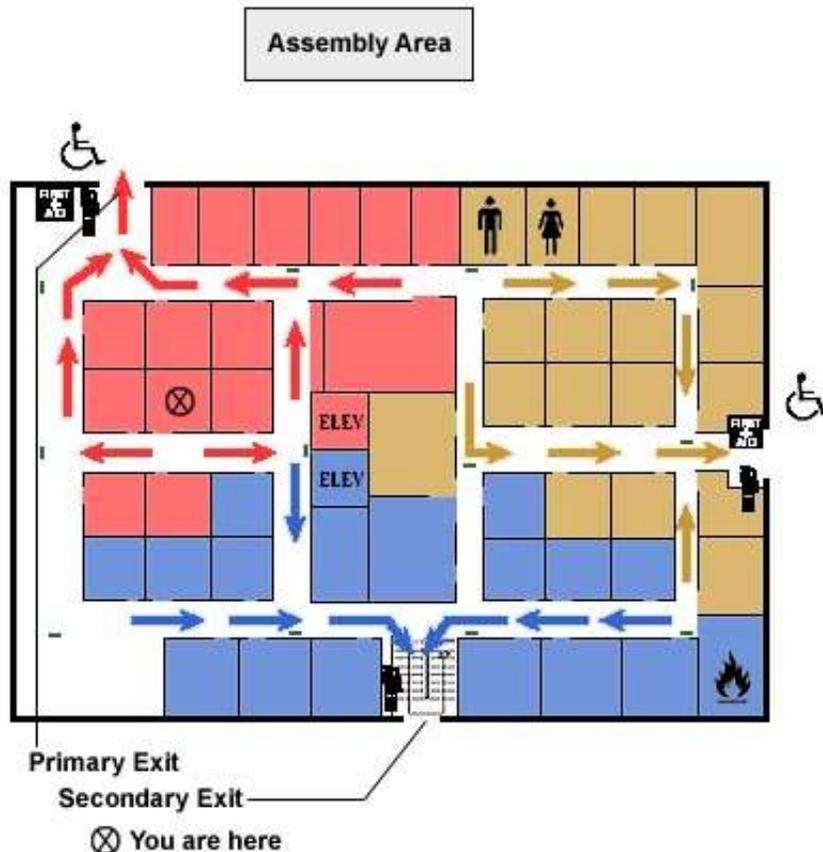
Evacuation Exits

Our workplaces will have a primary evacuation exit and an alternate exit. Diagrams will be posted that show the evacuation routes and the exits where all employees will see them. The exits and exit routes will be identified. Characteristics of exits include:

- They are clearly marked, well lit, and visible under emergency conditions
- They are wide enough to accommodate employees during an evacuation
- They are unobstructed and clear of debris at all times
- They are unlikely to expose employees to other hazards

An essential part of our Emergency Plan is an evacuation diagram – a floor plan of the facility or workplace that shows evacuation exits and describes the emergency evacuation procedure. Mark the exit routes and the “Roll-Call” assembly area on the diagram so that they are easy to see, for example:

Specialized Storage Systems, Inc Main Office and Shop (EXAMPLE)



Exit Routes

How would you escape from your workplace in an emergency? Do you know where all the exits are in case your first choice is too crowded? Are you sure the doors will be unlocked and that the exit access behind them will not be blocked during a fire, explosion, or other crisis? Knowing the answers to these questions could keep you safe during an emergency.

Workplace Exit Routes

Usually, a workplace must have at least two exit routes for prompt evacuation. But more than two exits are required if the number of employees, size of the building, or arrangement of the workplace will not allow a safe evacuation. Exit routes must be located as far away as practical from each other in case one is blocked by fire or smoke.

General Requirements for Exits

- Exits must be separated from the workplace by fire-resistant materials – that is, a one-hour fire-resistance rating if the exit connects three or fewer stories, and a two-hour fire-resistance rating if the exit connects more than three floors
- Exits can have only those openings necessary to allow access to the exit from occupied areas of the workplace or to the exit discharge. Openings must be protected by a self-closing, approved fire door that remains closed or automatically closes in an emergency
- Always keep the line-of-sight to exit signs clearly visible
- Install “EXIT” signs using plainly legible letters

Safety Features for Exit Routes

- Keep exit routes free of explosives or highly flammable materials, equipment, or other obstructions
- Exit routes will be arranged so that employees will not have to travel toward a high-hazard area unless the path of travel is effectively shielded from the high-hazard area
- Ensure that exit routes are free and unobstructed by materials, equipment, locked doors, or dead-end corridors
- Provide lighting for exit routes adequate for employees with normal vision
- Keep exit route doors free of decorations or signs that obscure their visibility of exit route doors
- Post signs along the exit access indicating the direction of travel to the nearest exit and exit discharge if that direction is not immediately apparent
- Mark doors or passages along an exit access that could be mistaken for an exit “Not an Exit” or with a sign identifying its use (such as “Closet”)
- Maintain exit routes during construction, repairs, or alterations

Design and Construction Requirements

- Exit routes must be permanent parts of the workplace
- Exit discharges must lead directly outside or to a street, walkway, refuge area, public way, or open space with access to the outside
- Exit discharge areas must be large enough to accommodate people likely to use the exit route
- Exit route doors must unlock from the inside. They must be free of devices or alarms that could restrict use of the exit route if the device or alarm fails
- Exit routes can be connected to rooms only by side-hinged doors that swing out in the direction of travel if the room may be occupied by more than 50 people
- Exit routes must support the maximum permitted occupant load for each floor served, and the capacity of an exit route may not decrease in the direction of exit route travel to the exit discharge
- Exit routes must have ceilings at least 7 ft., 6 in. high. An exit access must be at least 28 inches wide at all points

Providing Medical Assistance and First Aid

If there is not an emergency clinic or hospital nearby that will admit victims of emergencies from our workplace then on-scene coordinators will ensure that some members of on-site personnel have appropriate first-aid training and supplies.

Recording Critical Employee Information

After a medical emergency, an employee may be unable to contact next of kin or other relatives. Supervisors will have access to employees' home telephone numbers, the names and telephone numbers of family members they want you to contact, physician names and phone numbers, and information employees have given about their medical conditions or medications. This information will be kept with employees' permanent employment records and updated annually.

Reporting Fire and Other Emergencies

Our Emergency Plan has a procedure for reporting fires and other emergencies to professional responders. Report all fires by calling 911. Fires are generally not reported to fire departments by fire alarms; most fire alarms warn only building occupants. The incident commander will stay in a safe location to oversee and relay relevant information to professional emergency responders.

Selecting and Using Personal Protective Equipment

Personal protective equipment includes clothing and equipment that protects emergency responders against specific hazards. Examples include work gloves, goggles, hard hats, and respirators.

Properly used, personal protective equipment offers protection against a hazard but does not eliminate the hazard. If it fails or is not appropriate for a particular task, the user risks exposure.

Appropriate, effective protection depends on selecting, wearing, and using the equipment properly. The following steps outline the procedures for selecting personal protective equipment:

1. Identify emergency-related hazards for which personal protective equipment may be necessary; for example, those responding to medical emergencies need protection from bloodborne pathogens
2. Determine which personal protective equipment will protect users from the hazards; for example, latex gloves and face shields may be necessary to protect responders from bloodborne pathogens
3. Determine who will use the equipment; it is critical that the equipment fit the user and not cause allergic reactions or other health problems
4. Determine the conditions under which responders will use the equipment; the equipment must not fail under those conditions
5. Ensure that emergency responders know how to use the equipment. Whether they are wearing hard hats or atmosphere-supplying respirators, responders will know how the equipment will protect them and when it will not protect them. Responders will know how to wear, use, and maintain the equipment, and how to discard contaminated equipment

TYPES OF EMERGENCIES

Following are types of emergencies that could affect workplaces and summarizes what to do when responding to them. Consider factors such as workplace size and location, number of employees on-site, and the nature of their work in determining how to respond.

Earthquake

During an earthquake, people in most workplaces are at greatest risk from collapsing ceilings, windows, light fixtures, and other falling objects. If you are indoors, the safest response is to take cover under sturdy furniture or to brace yourself against an inside wall. Stay away from windows, skylights, bookcases, and other heavy objects. Protect your head and neck.

What to do:

- If indoors, stay there. Take cover under sturdy furniture or against inside walls
- Do not use elevators
- Stay away from windows, skylights, and other objects that could fall
- Use stairways to leave the workplace if the order is given to evacuate

Be ready to rescue victims; professional responders may not be able to respond; remove victims to a triage area if possible

Explosion

Any workplace that handles, stores, or processes flammable gases, liquids, and solids is vulnerable. Explosions offer no warnings, causing disorganization and panic.

What to do:

- Try to establish communication with on-scene coordinators
- Assess damage to the workplace and estimate human casualties
- Administer first aid if it is safe to do so
- Do not use elevators
- Evacuate following established procedures

Fire

If needed, invite a local fire department representative to our workplace to help identify fire hazards and to discuss how our workplace should respond to a fire. It is the byproducts of fire – smoke and fire gasses – that kill. A quick, orderly evacuation is the most effective response to an out-of-control fire.

What to do:

- Pull the fire alarm (or set off the predetermined signal)
- Call 911; tell the dispatcher the location and the nature of the emergency
- Inform an on-scene coordinator
- Do not use elevators
- Use ONE fire extinguisher for incipient stage fires or fires that can be extinguished with ONE extinguisher, fire extinguishers may be used for escape purposes

If on-scene coordinators or other employees are permitted to use fire extinguishers, they will be properly trained in their use for incipient stage fires and escape.

Hazardous-Substance Release

Hazardous substances include solvents, pesticides, paints, petroleum products, and heavy metals – any substance hazardous to health. Even if our workplace does not use hazardous substances, could it be affected by a nearby release or an accident on a local freeway? If so, our Emergency Plan describes how the scene commander and coordinators will respond and notify fire and police departments.

What to do:

- Inform the incident commander
- Evacuate the area surrounding the release
- Call 911; tell the dispatcher the location and the nature of the emergency

If our workplace uses hazardous chemicals, our Company Hazard Communication (HAZCOM) Program requires that we inventory them, keep the manufacturer-supplied material safety data sheets, label the chemical containers, and train employees to protect themselves from the chemicals' hazards.

If employees must wear personal protective equipment during an emergency – chemical suits, gloves, hoods, boots, or respirators, for example – make sure that equipment will be available when they need it, that it fits them, and that they know how to use it.

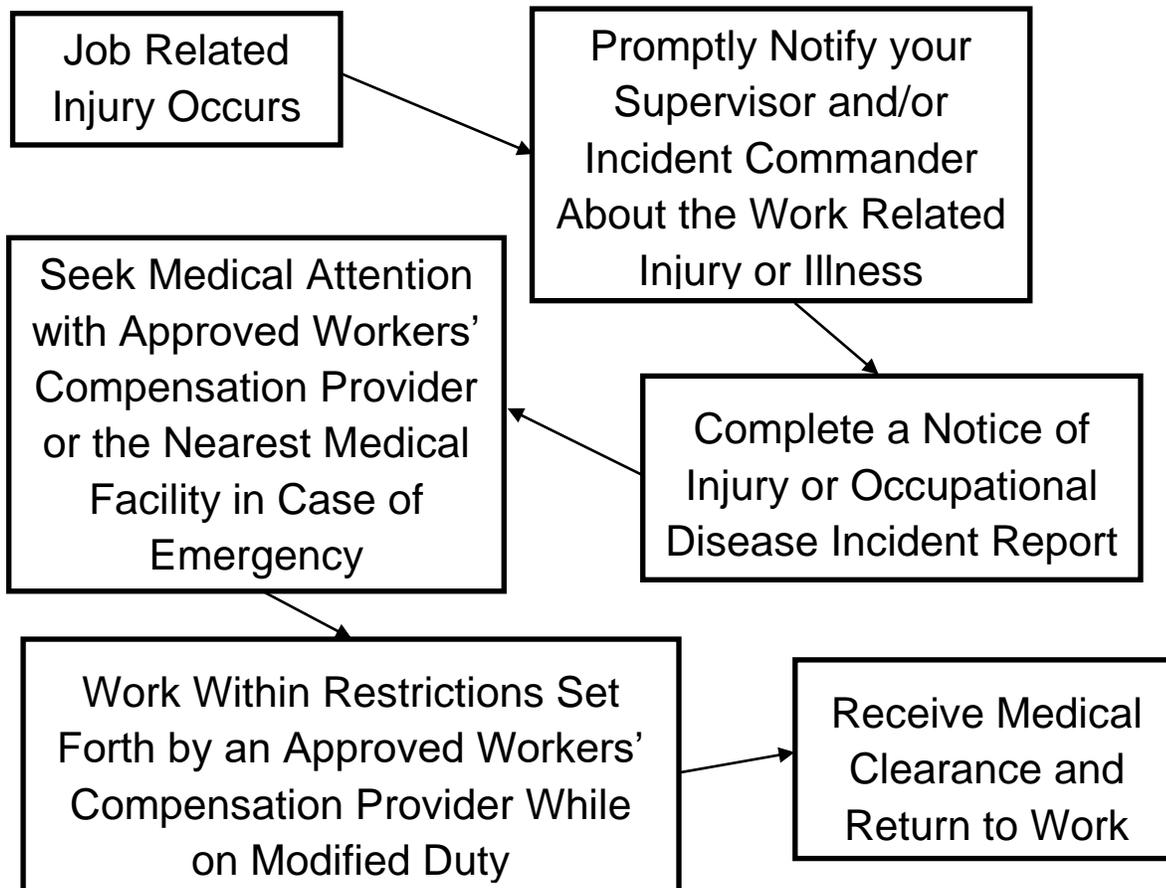
Medical

The most likely workplace emergency is a medical emergency. A serious medical emergency such as cardiac arrest requires immediate attention – response time is critical. It is essential that medical first responders know how to perform first aid/CPR.

What to do:

- Call 911. Tell the dispatcher the location and the nature of the emergency
- Do not move the victim
- Notify an on-scene coordinator for CPR or other first-aid tasks
- Inform the incident commander
- Assist professional medical responders when they arrive
- Inform the victim's supervisor
- Follow the medical case management process

Medical Case Management Process



Weather-Related Event

Hurricanes, tornadoes, blizzards, and floods are likely to be the cause of weather-related workplace emergencies. Many communities experience floods following warm spring rain. Winter storms often bring strong winds, freezing rain, and snow that can cause structural damage and power outages.

What to do:

- Wait for instructions from the incident commander; a power failure will slow communication
- Tune a battery-powered radio to a station that broadcasts local news
- Do not evacuate the workplace unless ordered to do so

Threats of Violence

Threats of violence may be delivered in any form: face-to-face, by fax, e-mail, phone, or in writing. Threats can be directed toward the workplace or toward a specific person. Police departments, mental health professionals, and employee-assistance program counselors offer prevention information, security inspections, and employee training that help reduce the risk of workplace violence.

What to do:

- Inform an on-scene coordinator
- Activate a silent alarm if your workplace has one
- Isolate the threatening person if it is possible to do so safely
- Inform the incident commander

Bomb Threats

Take all bomb threats seriously. Do not use fire alarms or phones in the building – they generate radio waves that could trigger a bomb. If someone finds a package that may contain or that may be a bomb, he or she should note its size, shape, and whether it emits a sound, and then notify the incident commander. Call 911 from outside the building to report the emergency and determine if an evacuation is necessary. Use a communication method that does not generate radio waves to order the evacuation.

Consider offering Threat-management training is available to on-scene coordinators and if appropriate, members of quick-response teams.

Terrorism

Although terrorist acts pose minimal risks to most workplaces, the devastating effects of recent acts have changed the perception of a “secure workplace” and added a new dimension to emergency planning. What distinguishes terrorist acts is the use of threats and violence to intimidate or coerce. Factors to consider in emergency planning include the following:

How do others perceive the mission of our Company in these contexts?

- Political activities
- Business activities
- Economic activities
- Social responsibilities

How vulnerable are our critical resources from terrorist attack?

- Production machinery and equipment
- Mail and HVAC systems
- Electronic communication, power, data, and systems hardware
- Real estate and other physical property
- Finance and administrative transactions
- Employees at the workplace or at other locations

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EMERGENCY ACTION PLAN (PAGE 2 OF 3)

ACCOUNTING FOR EMPLOYEES			
After exiting, all employees are to assemble for "Roll-Call" at this location: (Note location on above diagram)			
The following persons are responsible for ensuring that employees comply with this requirement:			
Name		Title	
Name		Title	
CRITICAL OPERATIONS			
To minimize damage from the emergency, the following personnel are responsible for shutting down the listed critical operations:			
Personnel Names		Critical Operations	
As soon as shutdowns are completed, the employees who performed critical operations will take the nearest exit route in accordance with general emergency procedures.			
RESCUE AND MEDICAL DUTIES			
The following personnel are certified and trained in both CPR and general first aid. These persons are to be contacted as specified in the "General Emergency Training":			
Name and Title		Phone Number	
REPORTING EMERGENCIES			
The following personnel have the duty of contacting public responders to come to the emergency scene. The personnel are listed in descending order of availability:			
Name and Title		Phone Number	

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EMERGENCY ACTION PLAN (PAGE 3 OF 3)

ALARM SYSTEMS AND NOTIFICATION OF EMERGENCIES			
In the event of a workplace or facility emergency, employees will be notified as follows:			
Identify method(s) of notification:			
TYPES OF EVACUATION			
OSHA requires to have an established system of types of evacuation to follow for different emergency circumstances. The following listing represents company policy for various emergency situations:			
PARTIAL EVACUATION: Code Yellow – 3 rings or horn blasts: RESPONDERS (trained extinguisher personnel and trained rescue and medical personnel)			
FULL EVACUATION: Code Red – 4 rings or horn blasts: RESPONDERS (n/a)			
NOTE: If there is more than one evacuation type, the alarm signal for each will be distinctive.			
OTHER <small>(Describe)</small>			
OTHER <small>(Describe)</small>			
PUBLIC EMERGENCY RESPONSE INFORMATION			
Ensure that 911 emergency services cover the area this Emergency Action Plan covers.			
Local Police Department:			
Local Fire Department:			
Local Ambulance/EMS:			
Local Hospital:			
FURTHER INFORMATION			
For further information or explanation about any duties under this Plan, contact:			
Name and Title			
Name and Title			
This Emergency Action Plan is authorized and approved by:			
Name		Title	
Signature		Date	

POLICY

Specialized Storage Systems, Inc has implemented this policy to ensure proper safe work practices and procedures are followed to protect employees from the fall hazards.

REFERENCES

- 1926 Subpart M, Fall protection
- § 1926.500, Scope, application, and definitions applicable to this subpart
- § 1926.501, Duty to have fall protection
- § 1926.502, Fall protection systems criteria and practices
- § 1926.503, Training requirements
- Appendix A, Determining roof widths - Non-mandatory guidelines for complying with 1926.501(b)(10)
- Appendix B, Guardrail systems - Non-mandatory guidelines for complying with 1926.502(b)
- Appendix C, Personal fall arrest systems - Non-mandatory guidelines for complying with 1926.502(d)
- Appendix D, Positioning device systems - Non-mandatory guidelines for complying with 1926.502(e)
- Appendix E, Sample fall protection plan - Non-mandatory guidelines for complying with 1926.502(k)

RESPONSIBILITIES

Employer Responsibilities

Specialized Storage Systems, Inc will provide at no cost to employees fall protection such as guard rails, safety nets, or personal fall arrest systems whenever employees are potentially exposed to falls to lower levels from heights of six feet or greater. This includes work near and around bins, tanks and excavations. Exception: When the standard methods of protection are not feasible or a greater hazard would be created. The exposure determination will be made without regards to the use of PPE.

Specialized Storage Systems, Inc is responsible for:

- Ensuring that safety inspections of the facility occur on regular basis
- Training personnel in fall protection equipment selection and use
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

David Cali Responsibilities

David Cali is the Program Administrator – designated qualified person - responsible for managing the Fall Protection Program. David Cali will specify a fall protection system for each work-site, supervise its implementation, and inspect the system prior to use.

Safety Committee Responsibilities

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

Employee Responsibilities

Employees will comply with the fall protection program at all times when working at heights of 6 feet or above will wear appropriate PPE (The fall protection system used will be appropriate for the specific work location or situation using best practices).

All employees are expected to: assist in job hazard analyses; follow safe job procedures; and report hazards to a supervisor immediately

TRAINING

David Cali will ensure that all employees who participate in work where fall hazards are present are trained in recognition of fall hazards, fall protection procedures, equipment, and work practices.

Written certification records will be maintained showing who was trained, types of training, dates of training, signature of person providing training, and the date training was determined to be adequate.

Employees will be certified upon completion of training in the following areas:

- The nature of fall hazards in the work area
- The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used
- The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, personal fall restraint systems, slide guard systems, positioning devices, and other protection to be used
- The role of each employee in the safety monitoring system when this system is used
- The limitations on mechanical equipment use of during roofing
- The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection
- The role of employees in the fall protection work plan

Employee re-training in fall protection will be provided when: previous training is deemed deficient; changes in work environment occur which would necessitate additional training; changes in fall protection equipment or systems occur; employee is observed applying unsafe work practices.

PROCEDURES

Prior to the start of work, David Cali will make an initial survey of the types of fall hazards which are expected to be encountered and develop a plan relative to providing the kind and number of safeguards that will protect against these fall hazards. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet or more above a lower level will be protected from falling by the use of guardrail systems, safety nets, or personal fall arrest systems.

- All accidents and serious incidents involving Specialized Storage Systems, Inc employees will be reported immediately to the supervisor for the work location. All accidents/incidents will be investigated under the guidelines of the company Accident Investigation Program. Changes will be implemented to the Fall Protection Plan as necessary
- Specialized Storage Systems, Inc will provide for prompt rescue of employees in the event of a fall or will assure the employees are able to rescue themselves
- All materials and equipment purchased and used at Specialized Storage Systems, Inc for fall protection will comply to ANSI and ASTM standards required for that material or equipment

Fall Protection Locations

Fall protection is required wherever the potential to fall 6 feet or more exists. Fall protection is not needed if an employee or employees are on a low sloped roof for inspection/observation, provided that they do not approach within 8 feet of the roof's edge.

Fall Protection Work Plans

David Cali will develop and implement a written fall-protection work plan including each area of the work place where employees are assigned and where fall hazards of 6 feet or more exist. It is recommended that the written plan be upgraded as conditions change. The fall-protection work plan will:

- Identify all fall hazards in the work area as the project work progresses
- Describe the method of fall arrest or fall restraint to be provided
- Describe the procedures for assembly, maintenance, and disassembly of the fall-protection system
- Describe procedures for the handling, storage, and securing of tools and materials
- Describe the method of providing overhead protection for workers who may be in, or pass through, the area below the work site
- Be available on the job site for inspection
- Ensure that employees are trained and instructed
- Include inspection of fall-protection devices and systems to ensure compliance with applicable parts of this procedure

Fall-Restraint & Fall-Arrest Systems

David Cali will ensure that fall-restraint or fall-arrest systems are provided, installed, and implemented according to the following requirements. Fall-restraint and arrest protection will consist of:

Standard Guardrails

- Top rail 39 to 45 inches above the working surface, and must be smooth and of a shape to permit grasping easily
- Midrail (center between riser and top rail), screen or mesh (continuous) or intermediate vertical members (not more than 19 inches apart) will be provided between the top rail and working surface
- Guardrail systems will be capable of supporting 250 pounds in the downward or outward direction at any point along the top edge
- Midrail will support a 150-pound load in the downward or outward direction
- Top rails and midrails will be at least 1/4-inch nominal thickness. Plastic or steel banding will not be used
- Chain gates will be used to cover hoisting areas, and the guardrails will extend 4 feet minimum on either side of the opening
- Rails will be so constructed so as not to deflect under test loads. If cable or rope is used it will have tension-adjusting capability and remain taut at all times
- Wood Railings: Wood components will be minimum 1500 lb.-ft. / in.² fiber (stress grade) construction grade lumber. Posts will be at least 2-inch by 4-inch (5 cm x 10 cm) lumber spaced not more than 8 feet (2.4 m) apart on centers. The top rail will be at least 2-inch by 4-inch (5 cm x 10 cm) lumber; the intermediate rail will be at least 1-inch by 6-inch (2.5 cm x 15 cm) lumber
- Pipe Railings: Post, top rails, and intermediate railings will be at least one and one-half inches nominal diameter (schedule 40 pipe) with posts spaced not more than 8 feet (2.4 m) apart on centers
- Structural Steel Railings: Posts, top rails, and intermediate rails will be at least 2-inch by 2-inch (5 cm x 10 cm) by 3/8-inch (1.1 cm) angles, with posts spaced not more than 8 feet (2.4 m) apart on centers

Portable Guardrails

- Portable guardrails may be used in locations where permanent guardrails are not feasible
- Top rail 39 to 45 inches above the working surface, and must be smooth and of a shape to permit grasping easily
- Midrail (center between riser and top rail), screen or mesh (continuous) or intermediate vertical members (not more than 19 inches apart) will be provided between the top rail and working surface
- Guardrail systems will be capable of supporting 250 pounds in the downward or outward direction at any point along the top edge
- Midrail will support a 150-pound load in the downward or outward direction

Harness, Lanyards, Lifelines & Anchor Points

- An approved Class III full-body harness will be used
- All full-body harness and lanyard hardware assemblies will be capable of withstanding a tensile loading of 4,000 pounds without cracking, breaking, or taking a permanent deformation
- Anchorage points used for fall restraint will supporting four times the intended load
- Restraint protection and positioning devices will be rigged to allow the movement of employees only as far as the sides and edges of the walking / working surface
- Full-body harnesses will be attached to securely rigged restraint lines
- Rope-grab devices are prohibited for fall-restraint applications unless they are part of a fall-restraint system designed specifically for the purpose by the manufacturer and used in strict accordance with the manufacturer's recommendations and instructions
- David Cali will ensure component compatibility
- Body-harness systems or components subject to impact loading will be immediately removed from service and will not be used again for employee protection unless inspected and determined by a competent person to be undamaged and suitable for reuse
- All safety lines and lanyards will be protected against being cut or abraded
- Body-harness systems will be rigged to minimize free-fall distance with a maximum free-fall distance allowed of 6 feet, and ensure that employees will not contact any lower level
- Hardware will have a corrosion-resistant finish and all surfaces and edges will be smooth to prevent damage to the attached body harness or lanyard
- When vertical lifelines (droplines) are used, not more than one employee will be attached to any one lifeline
- Full-body harness systems will be secured to anchorages capable of supporting 5,000 pounds per employee, except when self-retracting lifelines or other deceleration devices are used which limit free fall to two feet; in this case, anchorages will be capable of supporting 3,000 pounds
- Independent lifelines (droplines) will have a minimum tensile strength of 5,200 pounds, except that self-retracting lifelines and lanyards, which automatically limit free-fall distance to two feet or less, will have a minimum tensile strength of 3,000 pounds
- Horizontal lifelines will have a tensile strength capable of supporting a fall-impact load of at least 5,200 pounds per employee using the lifeline, applied anywhere along the lifeline
- Lanyards will have a minimum tensile strength of 5,200 pounds
- All components of body-harness systems whose strength is not otherwise specified in this section will be capable of supporting a minimum fall-impact load of 5,000 pounds applied at the lanyard point of connection
- Snap-hooks will not be connected to loops made in webbing-type lanyards
- Snap-hooks will not be connected to each other
- Not more than one snap-hook will be connected to any one D-ring
- Independent lifelines used on rock-scaling operations, or in areas where the lifeline may be subjected to cutting or abrasion, will be a minimum of 7/8-inch wire core manila rope. For all other lifeline applications, a minimum of 3/4-inch manila rope or its equivalent, with a minimum breaking strength of 5,000 pounds, will be used

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- Safety harnesses, lanyards, and lifelines, independently attached or attended, will be used while performing the following types of work when other equivalent protection is not provided:
 - Work in hoppers, bins, silos, tanks, or other confined spaces
 - Work on hazardous slopes, or dismantling safety nets
 - Working on poles or from boatswains chairs at elevations
- Fall protection will be used when working at heights greater than six feet, on swinging scaffolds or other unguarded locations, and work on skips and platforms used in shafts by crews when the skip or cage does not include the opening to within one foot of the sides of the shaft, unless cages are provided
- Full-body harness systems will be inspected prior to each use for mildew, wear, damage, and other deterioration, and defective components will be removed from service if their function or strength has been adversely affected

Safety Nets

- Safety nets will be installed as close as practicable under the walking/working surface on which employees are working, but in no case more than 30 feet (9.1 m) below such level. When nets are used on bridges, the potential fall area from the walking/working surface to the net will be unobstructed
- Safety nets will extend outward from the outermost projection of the work surface as follows:

Vertical distance from working level to horizontal plane of net	Minimum required horizontal distance of outer edge of net from the edge of the working surface
Up to 5 feet	8 feet
More than 5 feet up to 10 feet	10 feet
More than 10 feet	13 feet

- Safety nets will be installed with sufficient clearance under them to prevent contact with the surface or structures below when subjected to an impact force equal to the drop test specified in the full-body harness section
- Safety nets and their installations will be capable of absorbing an impact force equal to that produced by the drop test specified in the full-body harness section
- Safety nets and safety-net installations will be drop-tested at the job site before being used as a fall-protection system. The drop-test will consist of a 400-pound bag of sand 30+2 inches in diameter dropped into the net from the highest walking / working surface on which employees are to be protected. Exception: when the employer can demonstrate that a drop-test is not feasible or practicable, the net and net installation will be certified by a qualified person to be in compliance with the provisions of this section
- Safety nets will be inspected weekly for mildew, wear, damage, and other deterioration, and defective components will be removed from service
- Materials, scrap pieces, and tools which have fallen into the safety net will be removed as soon as possible from the net, and at least before the next work shift

- The maximum size of each safety net mesh opening will not exceed 36 square inches nor be longer than six inches on any side measured center-to-center of mesh ropes or webbing. All mesh crossings will be secured to prevent the enlargement of any mesh opening
- Each safety net (or section of it) will have a border rope for webbing with a minimum breaking strength of 5,000 pounds
- Connections between the safety-net panels will be as strong as integral net components and will be spaced not more than six inches apart

Catch Platforms

A catch platform will be installed within ten vertical feet of the work area. The catch platform's width will equal the distance of the fall but will be a minimum of 45 inches wide and will be equipped with standard guardrails on all open sides.

Guarding Of Low-Pitched Roof Perimeters

During the performance of work on low-pitched roofs with a ground-to-eaves height greater than 6 feet, David Cali will ensure that employees engaged in such work be protected from falling from all unprotected sides and edges of the roof as follows:

- By the use of a fall-restraint or fall-arrest system, as defined in applicable OSHA or state regulations
- Mechanical equipment will be used or stored only in areas where employees are protected by a warning line system, or fall-restraint, or fall-arrest systems as described in applicable OSHA or state regulations. Mechanical equipment may not be used or stored where the only protection is provided by the use of a safety monitor
- The general provisions section of this section do not apply at points of access such as stairways, ladders and ramps, or when employees are on the roof only to inspect, investigate, or estimate roof-level conditions. Roof-edge materials handling areas and materials storage areas will be guarded as provided in the roof-edge materials handling section of this section
- Workers engaged in built-up roofing on low-pitched roofs less than 50 feet wide may use a safety system without warning lines where the use of hot tar poses additional hazards

Warning-Line Systems & Access Paths

- When mechanical equipment is not being used, the warning line will be erected not less than 6 feet (1.8 m) from the roof edge
- When mechanical equipment is being used, the warning line will be erected not less than 6 feet (1.8 m) from the roof edge which is parallel to the direction of mechanical equipment operation, and not less than 10 feet (3.1 m) from the roof edge which is perpendicular to the direction of mechanical equipment operation
- Points of access, materials handling areas, storage areas, and hoisting areas will be connected to the work area by an access path formed by two warning lines
- When the path to a point of access is not in use, a rope, wire, chain, or other barricade, equivalent in strength and height to the warning line, will be placed across the path at the point where the path intersects the warning line erected around the work area, or the path will be offset such that a person cannot walk directly into the work area
- Warning lines will be erected around all sides of the work area for work 6 to 10 feet from the roof edge.

- A warning-line system as prescribed in 29 CFR 1926.500 and supplemented by the use of a safety-monitor system as prescribed in 29 CFR 1926.500 to protect any employee engaged in duties between the forward edge of the warning line and the unprotected sides and edges, including the leading edge, of a low-pitched roof or walking/working surface
- Warning line and safety monitor systems as described in 29 CFR 1926.500 are prohibited on surfaces exceeding a 4/12 pitch, and on any surface whose dimensions are less than 45 inches in all directions
- The warning line will consist of a rope, wire, or chain and supporting stanchions
- The rope, wire, or chain will be flagged at not more than six feet intervals with high-visibility material
- The rope, wire, or chain will be rigged and supported in such a way that its lowest point (including sag) is no less than 39 inches from the roof surface and its highest point is no more than 45 inches from the roof surface
- After being erected, with the rope, wire or chain attached, stanchions will be capable of resisting, without tipping over, a force of at least 16 pounds applied horizontally against the stanchion, 30 inches above the roof surface, perpendicular to the warning line, and in the direction of the roof edge
- The rope, wire, or chain will have a minimum tensile strength of 500 pounds, and after being attached to the stanchions, will be capable of supporting, without breaking, the loads applied to the stanchions
- The line will be attached at each stanchion in such a way that pulling of one section of line between stanchions will not result in slack being taken up in adjacent sections before the stanchion tips over.
- Access paths: points of access, materials-handling areas, and storage areas will be connected to the work area by a clear access path formed by two warning lines.
- When the path to a point of access is not in use, a rope, wire or chain, equal in strength and height to the warning line, will be placed at the point where the path intersects the warning line erected around the work area.

Roof-edge Materials-Handling Areas & Materials Storage

Employees working in a roof-edge materials-handling or materials storage area location on a low-pitched roof with a ground-to-work-area height greater than six feet will be protected from falling along all unprotected roof sides and edges of the area.

- When guardrails are used at hoisting areas, a minimum of four feet of guardrail will be erected on each side of the access point through which materials are hoisted
- A chain or gate will be placed across the opening between the guardrail sections when hoisting operations are not taking place
- When guardrails are used at bitumen pipe outlets, a minimum of four feet of guardrail will be erected on each side of the pipe
- When safety-harness systems are used, they will not be attached to the hoist
- When fall-restraint systems are used, they will be rigged to allow the movement of employees only as far as the roof edge
- Materials will not be stored within six feet of the roof edge unless guardrails are erected at the roof edge

Leading-Edge Control Zone

When performing leading-edge work, David Cali will ensure that a control zone is established according to the following requirements:

- The control zone will begin a minimum of six feet back from the leading edge to prevent exposure by employees who are not protected by fall-restraint or fall-arrest systems
- The control zone will be separated from other areas of the low-pitched roof or walking/working surface by the erection of a warning-line system
- The warning-line system will consist of wire, rope, or chain supported on stanchions, or a method which provides equivalent protection
- The spacing of the stanchions and support of the line will be such that the lowest point of the line (including sag) is not less than 39 inches from the walking / working surface, and its highest point is not more than 45 inches from the working / walking surface
- Each line will have a minimum tensile strength of 500 pounds
- Each line will be flagged or clearly marked with high-visibility materials at intervals not to exceed six feet

Safety-Monitor System

The employer will designate a competent person to monitor the safety of other employees and the employer will ensure that the safety monitor complies with the following requirements:

- Be competent to recognize fall hazards
- Warn the monitored employee(s) when it appears they are unaware of a fall hazard or is acting in an unsafe manner
- The safety monitor will be on the same walking/working surface and within visual sighting distance of the employee(s) being monitored
- The safety monitor will be close enough to communicate orally with the employee(s) being monitored
- The safety monitor will have no other responsibilities that could take his/her attention from the monitoring function
- The safety monitoring system will not be used as a fall protection system for any work other than roofing work on roof slopes of 2 in 12 (vertical to horizontal) or less
- Use of a safety monitoring system alone (i.e., without the warning line system) is not permitted on roofs more than 50 feet (15.25 m) in width
- When selected, the employer will ensure that the safety-monitor system will be addressed in the fall-protection work plan, include the name of the safety monitor(s) and the extent of their training in both the safety-monitor and warning-line systems, and will ensure that the following requirements are met:
 - The safety-monitor system will not be used when adverse weather conditions create additional hazards.
 - A person acting in the capacity of a safety monitor will be trained in the function of both the safety-monitor and warning-lines systems

- The safety monitor will:
 - Be a competent person as defined in 29 CFR 1926.32(f)
 - Have control authority over the work as it relates to fall protection
 - Be instantly distinguishable from members of the work crew
 - Engage in no other duties while acting as safety monitor
 - Be positioned in relation to the workers under their protection, so as to have a clear, unobstructed view and be able to maintain normal voice communication
 - Not supervise more than eight exposed employees at one time
- Control zone workers will be distinguished from other members of the crew by wearing a high-visibility vest only while in the control zone

General Safety Considerations

The company will ensure prompt rescue of employees in the event of a fall or will assure that employees are able to rescue themselves.

Fall arrest systems will be inspected prior to each use for wear, damage and other deterioration, and defective components will be removed from service.

If Fall Protection Plans are utilized, site specific plans will be prepared, or modified by a Qualified Person, and maintained at the job site. The plan will be under the supervision of a Competent Person, and the plan will address why the use of conventional fall protection is infeasible, or why their use would cause a greater hazard.

If Fall Protection Plans are utilized, David Cali will post a written notice of how is designated to work in controlled access zones. No other employees may enter controlled access zones.

If Fall Protection Plans are utilized, and in the event an employee falls, or some other related, serious incident occurs, (e.g., a near miss) the company will investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g. new practices, procedures, or training) and will implement those changes to prevent similar types of falls or incidents.

All affected employees will undergo training to the recognize fall hazards and how to minimize these hazards. Retraining will occur when the following conditions occur: it is determined that employees already trained do not have the necessary understanding or skill, work place changes, and/or fall protection systems or equipment changes that render previous training obsolete. This training is documented, and the latest training certification is maintained.

Hole Covers

Covers located in roadways and vehicular aisles shall be capable of supporting at least twice the maximum axle load of the largest vehicle expected to cross over the cover without failing.

All other covers shall be capable of supporting, without failure, at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time.

In order to prevent accidental displacement by the wind, equipment, or employees, all covers shall be secured when installed.

All covers shall be color coded or be marked with the word "HOLE" or "COVER" to provide warning of the hazard.

Note: This provision does not apply to cast iron manhole covers or steel grates used on streets or roadways.

POLICY

Specialized Storage Systems, Inc has implemented this policy to ensure proper safe work practices and procedures are followed for the protection of our employees against fire/explosion hazards. The following work practices, procedures, and engineering controls will be enforced as an integral part of our Company safety policy

RESPONSIBILITIES

David Cali is designated as the supervisor to manage the Fire Prevention Program. Specialized Storage Systems, Inc will have and maintain an employee alarm system. The employee alarm system will use a distinctive signal for each purpose. David Cali will ensure that all employees are informed and trained in the following minimum elements for Emergency Action Plans:

- David Cali will ensure all employees are trained in the proper operation of all types of fire extinguishers provided by the company
- As warranted by the project, Specialized Storage Systems, Inc will provide a trained and equipped organization (Fire Brigade) to assure adequate protection to life
- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation for all areas of work, including type of evacuation and exit route assignments
- Safe assembly areas designated for all work areas in the event of evacuation
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
- Procedures to account for all employees after evacuation
- Procedures to be followed by employees performing rescue or medical duties
- The members in the chain of command who may be contacted by employees who need more information about the Plan or for an explanation of their duties under the Plan
- All materials will be stored, handled, and piled with regard to their fire characteristics

TRAINING

Specialized Storage Systems, Inc will designate and train employees to assist in a safe and orderly evacuation of other employees.

David Cali will review the Fire Prevention Plan with each employee covered by the plan: when each Plan is developed or an employee is initially assigned to a job; when the employee's responsibilities under the Plan change; when any element of the Plan is changed.

Fire Protection/Prevention training will be required on initial hiring and annually thereafter. Employees will be trained in fighting class A, B, C, D, and K fires using the PASS method.

All employees will be trained in the hazards involved in using fire extinguishers for incipient stage firefighting and escape purposes. Employees are instructed to ensure the local Emergency Medical Service EMS (Fire Department) is notified before attempting to extinguish any fire, and that if a fire is not immediately extinguished using one fire extinguisher, or the fire recurs to evacuate immediately.

Where the employer has provided portable fire extinguishers for employee use in the workplace, the employer will also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting.

The employer will provide training upon initial employment and at least annually thereafter.

SAFE PRACTICES

All fire extinguishers and firefighting equipment will be inspected by David Cali on a monthly basis; this inspection will be recorded and documented with the required annual maintenance check. And defective equipment will be replaced immediately. Records of inspection will be kept on file in the office.

Procedures are instructions for accomplishing specific tasks. Emergency procedures are important because they tell employees exactly what to do to ensure their safety during an emergency to accomplish each of the following tasks:

- Report emergencies to local fire and police departments
- Inform the emergency chain of command of an emergency
- Warn employees about an emergency
- Conduct an orderly, efficient workplace evacuation
- Assist employees with disabilities or injuries during an evacuation
- Shut down critical equipment, operate fire extinguishers, and perform other essential services during an evacuation. Account for employees at a designated safe area after an evacuation
- Perform rescue and first aid that may be necessary during an emergency

FIRE CLASSES

Not all fires are the same. Different fuels create different fires and require different types of fire extinguishing agents. The fire types are listed below:

- Class A – Ordinary combustibles such as wood, paper, cloth, trash, and plastics
- Class B – Flammable liquids such as gasoline, petroleum oil, and paint. Also includes flammable gasses such as propane and butane
 - Class B does NOT include fires involving cooking oils and grease
- Class C – Energized Electrical Equipment such as motors, transformers, and appliances.
 - If the power is removed, Class C fires become one of the other classes of fire
- Class D – Combustible metals such as potassium, sodium, aluminum, and magnesium
- Class K – Cooking oils and grease such as animal fats and vegetable fats

SELECTION AND DISTRIBUTION

Portable fire extinguishers will be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of hazard which would affect their use.

Specialized Storage Systems, Inc will distribute portable fire extinguishers for use by employees on Class A fires so that the travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.

Specialized Storage Systems, Inc may use uniformly spaced standpipe systems or hose stations connected to a sprinkler system installed for emergency use by employees instead of Class A portable fire extinguishers, provided that such systems meet the respective requirements of 1910.158 or 1910.159, that they provide total coverage of the area to be protected, and that employees are trained at least annually in their use.

Specialized Storage Systems, Inc will distribute portable fire extinguishers for use by employees on Class B fires so that the travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.

Specialized Storage Systems, Inc will distribute portable fire extinguishers used for Class C hazards on the basis of the appropriate pattern for the existing Class A or Class B hazards.

Specialized Storage Systems, Inc will distribute portable fire extinguishers or other containers of Class D extinguishing agent for use by employees so that the travel distance from the combustible metal working area to any extinguishing agent is 75 feet (22.9 m) or less. Portable fire extinguishers for Class D hazards are required in those combustible metal working areas where combustible metal powders, flakes, shavings, or similarly sized products are generated at least once every two weeks.

INSPECTION, MAINTENANCE, AND TESTING

David Cali will be responsible for the inspection, maintenance and testing of all portable fire extinguishers in the workplace.

Portable extinguishers or hose used in lieu thereof will be visually inspected monthly.

Specialized Storage Systems, Inc will assure that:

- Portable fire extinguishers are subjected to an annual maintenance check. Stored pressure extinguishers do not require an internal examination. The employer will record the annual maintenance date and retain this record for one year after the last entry or the life of the shell, whichever is less. The record will be available to the Assistant Secretary upon request.
- Stored pressure dry chemical extinguishers that require a 12-year hydrostatic test are emptied and subjected to applicable maintenance procedures every 6 years. Dry chemical extinguishers having non-refillable disposable containers are exempt from this requirement. When recharging or hydrostatic testing is performed, the 6-year requirement begins from that date.
- Alternate equivalent protection is provided when portable fire extinguishers are removed from service for maintenance and recharging.

Hydrostatic Testing

Specialized Storage Systems, Inc will assure that hydrostatic testing is performed by trained persons with suitable testing equipment and facilities.

Specialized Storage Systems, Inc will assure that portable extinguishers are hydrostatically tested at the intervals listed in the table below, except under any of the following conditions:

- When the unit has been repaired by soldering, welding, brazing, or use of patching compounds;
- When the cylinder or shell threads are damaged;
- When there is corrosion that has caused pitting, including corrosion under removable name plate assemblies;
- When the extinguisher has been burned in a fire; or
- When a calcium chloride extinguishing agent has been used in a stainless steel shell.

In addition to an external visual examination, the employer will assure that an internal examination of cylinders and shells to be tested is made prior to the hydrostatic tests.

Type of Extinguishers	Test Interval (Years)
Soda Acid (soldered brass shells) (until 1/1/82)	(1)
Soda Acid (stainless steel shells)	5
Cartridge operated water and/or antfreeze	5
Stored pressure water and/or antfreeze	5
Wetting agent	5
Foam (soldered brass shells) (until 1/1/82)	(1)
Foam (stainless steel shells)	5
Aqueous film forming foam (AFFF)	5
Loaded steam	5
Dry chemicals with stainless steel	5
Carbon Dioxide	5
Dry chemical, stored pressure, with mild steel, brazed brass, or aluminum shells	12
Dry chemical, cartridge or cylinder operated, with mild steel shells	12
Halon 1211	12
Halon 1301	12
Dry Powder, cartridge, or cylinder operated with mild steel shells	12

¹Extinguishers having shells constructed of copper or brass joined by soft solder or rivets will not be hydrostatically tested and will be removed from service by January 1, 1982. (Not permitted)

Specialized Storage Systems, Inc will assure that:

- Portable fire extinguishers are hydrostatically tested whenever they show new evidence of corrosion or mechanical injury, except under the conditions listed in paragraphs (f)(2)(i)-(v) of this section.
- Hydrostatic tests are performed on extinguisher hose assemblies which are equipped with a shut-off nozzle at the discharge end of the hose. The test interval will be the same as specified for the extinguisher on which the hose is installed.

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- Carbon dioxide hose assemblies with a shut-off nozzle are hydrostatically tested at 1,250 psi (8,620 kPa).
- Dry chemical and dry powder hose assemblies with a shut-off nozzle are hydrostatically tested at 300 psi (2,070 kPa).

Hose assemblies passing a hydrostatic test do not require any type of recording or stamping. Specialized Storage Systems, Inc will assure that:

- Hose assemblies for carbon dioxide extinguishers that require a hydrostatic test are tested within a protective cage device.
- Carbon dioxide extinguishers and nitrogen or carbon dioxide cylinders used with wheeled extinguishers are tested every 5 years at 5/3 of the service pressure as stamped into the cylinder. Nitrogen cylinders which comply with 49 CFR 173.34(e)(15) may be hydrostatically tested every 10 years.
- All stored pressure and Halon 1211 types of extinguishers are hydrostatically tested at the factory test pressure not to exceed two times the service pressure.
- Acceptable self-generating type soda acid and foam extinguishers are tested at 350 psi (2,410 kPa).

Air or gas pressure may not be used for hydrostatic testing.

Extinguisher shells, cylinders, or cartridges which fail a hydrostatic pressure test, or which are not fit for testing will be removed from service and from the workplace.

The equipment for testing compressed gas type cylinders will be of the water jacket type. The equipment will be provided with an expansion indicator which operates with an accuracy within one percent of the total expansion or .1cc (.1mL) of liquid.

The equipment for testing non-compressed gas type cylinders will consist of the following:

A hydrostatic test pump, hand or power operated, capable of producing not less than 150 percent of the test pressure, which will include appropriate check valves and fittings;

A flexible connection for attachment to fittings to test through the extinguisher nozzle, test bonnet, or hose outlet, as is applicable; and

A protective cage or barrier for personal protection of the tester, designed to provide visual observation of the extinguisher under test.

Specialized Storage Systems, Inc will maintain and provide upon request to the Assistant Secretary evidence that the required hydrostatic testing of fire extinguishers has been performed at the time intervals shown in the table above. Such evidence will be in the form of a certification record which includes the date of the test, the signature of the person who performed the test and the serial number, or other identifier, of the fire extinguisher that was tested. Such records will be kept until the extinguisher is hydrostatically retested at the time interval specified in the table above or until the extinguisher is taken out of service, whichever comes first.

POLICY

It is the policy of Specialized Storage Systems, Inc that training in first aid response is not a requirement for employment, but that local Emergency Medical Services are utilized for emergency medical care. David Cali is designated as the administrator of the Medical Services Program.

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

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<ul style="list-style-type: none"> • PPE for First Aid: • 3-Pair latex gloves • Surgical masks • Clear eye protection or Face Shield • Dust Masks or other needed Face Protection • Mouth-to-mouth barrier • Large, sterile gauze pads (6 each: 2X2's, 3X3's, and 4X4's) • Compress Dressings (4X8), 3 each • Rolled gauze bandages: 2" and 3" wide, 3 each • Large box assorted "Band-Aids" • Two elastic wrap bandages (ace) • Cotton balls and Q-tips • Surgical or athletic tape; 1" and 2" wide, 2 rolls each 	<ul style="list-style-type: none"> • Antiseptics and ointments: <ul style="list-style-type: none"> ○ Alcohol ○ Burn gel or cream ○ Alcohol swabs ○ Peroxide ○ Antiseptic spray and ointment • Pain relief tabs • 6 burn treatment single-use packages, 0.5 g. Application • Good quality eye-wash solution, with eye cup • 1 eye covering bandages (for two eyes) • Self-activating cold packs, 4x5 inches • Liquid antiseptic hand soap • Blunt-nose surgical scissors • Forceps, tweezers and safety pins • Snake-bite kit
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* General First-aid Guidebook, textbook, or manual will be readily available, but not necessarily inside of the first-aid kit.

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

POLICY

This program is designed for the prevention of employee accidents and injuries while operating industrial trucks (forklifts). Only trained and certified operators, including supervisors, are allowed to operate Powered Industrial Trucks (Forklifts).

REFERENCES

- §1910.178 – Powered Industrial Trucks

RESPONSIBILITIES

Safe forklift operation is a responsibility shared between the Company and its employees.

Employer Responsibilities

Specialized Storage Systems, Inc is responsible for:

- Ensuring each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by the successful completion of our training and evaluation
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing jobsite conditions whenever there is a significant change to any element of the job or there has been an injury or illness

Safety Committee Responsibilities

- Assist in jobsite review for hazards to forklifts as necessary
- Assist in training employees to recognize and control workplace hazards
- Ensure operators of forklifts are certified operators
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

- Operate forklifts only when certified to do so
- Follow safe job procedures
- Report hazards to a supervisor immediately

Powered Industrial Truck Operators:

Operators are responsible for the following:

- Operating all powered industrial trucks in a safe manner consistent with safe rules of operation.
- Inspecting powered industrial trucks at the beginning of each work shift and completing the appropriate inspection forms.
- Reporting all equipment malfunctions and/or maintenance needs to their supervisors immediately.
- Park lift in safe place, remove key, tag or note problem.

TRAINING

Training will include: formal classroom education, practical training, and an instructor's evaluation of the operator's performance. The instructor providing the training will be knowledgeable about the formal education and worksite requirements and qualified to provide operating instructions and evaluate each student's performance in the following:

- Load capacity
- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate
- Differences between the truck and the automobile
- Truck controls and instrumentation: location, what they do, and how they work
- Engine or motor operation
- Steering and maneuvering
- Visibility (including restrictions due to loading)
- Fork and attachment adaptation, operation, and use limitations
- Vehicle capacity and stability
- Any vehicle inspection and maintenance that the operator will be required to perform
- Refueling and/or charging and recharging of batteries
- Operating limitations
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate

Workplace-related topics include:

- Surface conditions where the vehicle will be operated
- Composition of loads to be carried and load stability
- Load manipulation, stacking, and unstacking
- Pedestrian traffic in areas where the vehicle will be operated
- Narrow aisles and other restricted places where the vehicle will be operated
- Hazardous (classified) locations where the vehicle will be operated
- Ramps and other sloped surfaces that could affect the vehicle's stability
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust
- Other potentially hazardous environmental conditions in the workplace
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate

Refresher Training Requirements

Refresher training, including an evaluation of the effectiveness of that training, will be conducted to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely.

Refresher training will be conducted when:

- The operator has been observed to operate the vehicle in an unsafe manner
- The operator has been involved in an accident or near-miss incident
- The operator has received an evaluation that reveals that the operator is not operating the truck safely
- The operator is assigned to drive a different type of truck
- A condition in the workplace changes in a manner that could affect safe operation of the truck

An evaluation and recertification of each powered industrial truck operator's performance will be conducted at least once every three years. Employee training records will be maintained for a minimum of 5 years.

SAFE PRACTICES

Operator Requirements

- Operators must be certified to use the equipment he/she is operating
- Operators are prohibited from operating powered industrial trucks while under the influence of any of the following that might impair their driving skills:
 - Alcohol
 - Illegal drugs
 - Prescription or over the counter medications

Equipment Inspection and Maintenance

- The operator will inspect their powered industrial truck before each shift
- A file will be maintained that lists the shift inspections of equipment. This file will be kept at the Specialized Storage Systems, Inc Administration Offices
- A maintenance log will be kept that identifies repair needs and corrective actions taken for each powered industrial truck. This log will be kept at the Maintenance Administration Offices
- If repairs are needed on a powered industrial truck such that it cannot be safely operated, it will; be taken out of service until the repairs have been made
- After repairs have been completed, the powered industrial truck will be given a performance test to ensure that the equipment is safe to operate
- Forklifts will be kept in clean condition, free of dirt, excess oil and grease

Changing and Charging Batteries

- Equipment will be provided to safely flush and neutralize spilled battery acid and electrolyte
- Smoking will be prohibited in all battery-charging areas
- Eyewash equipment will be maintained in all charging areas
- Precautions to prevent open flames, sparks and electric arcs in charging areas
- Employees who change and service batteries and handle corrosive liquids will wear the proper Personal Protective Equipment (PPE)

General Safety

- Only authorized, trained personnel will operate lift trucks
- Before start of shift, a visual inspection must be conducted. Employees will not operate an unsafe forklift at any time
- Fill fuel tanks out of doors while engine is off
- Operators will drive with both hands on the steering wheel. Horseplay is prohibited. Do not drive with wet or greasy hands
- No person will ride as a passenger on a forklift or on the load being carried
- A forklift will not be used to elevate a platform or pallet with persons on it, except work platforms especially designed for this purpose. Work platforms must have standard guard rails, and must be securely fastened to the forks
- No person will stand or walk under elevated forks
- Operators will avoid making jerky starts, quick turns, or sudden stops. The operator will not use reverse as a brake
- Slow down on wet & slippery surfaces, cross aisles or locations with obstructed visions
- Operators entering a building or nearing a blind corner will make their approach at reduced speed. Sound horn and proceed carefully
- Operators will give pedestrians the right-of-way at all times
- Operators will not drive toward any person who is in front of a fixed object or wall
- Operators will not overtake and pass another forklift traveling in the same direction, at intersections, blind spots, or hazardous locations
- Operators will not put their fingers, arms, or legs between the uprights of the mast, or beyond the contour of the forklift
- Forks will always be placed under the load as far as possible. Do not lift a load with one fork
- No load will be moved unless it is absolutely safe and secure
- Use extra care when handling long lengths of bar stock, pipe, or other materials
- Avoid sharp or fast end-swing
- Compressed gas cylinders will be moved only in special pallets designed for this purpose
- When loading or unloading trucks or trailers, the brakes on the vehicle will be set (locked) and the wheels of the truck and/or trailer will be chocked and secured
- Forklifts must be safely parked when not in use. The controls will be neutralized, power shut off, brakes set, key removed, and the forks left in a down position flat on the surface, and not obstructing walkways or aisles
- A forklift will not be left on an incline unless it is safely parked and the wheels blocked
- Only stable and safely arranged loads will be handled
- Only loads within the rated capacity of the powered industrial truck will be handled

Traveling

- Specialized Storage Systems, Inc speed limits will be observed, and under all travel conditions, a powered industrial truck will be operated at speeds that will permit it to be brought to a stop in as safe manner
- Three truck lengths (or two seconds) will be maintained between powered industrial trucks in operation
- The powered industrial truck will be kept under control at all times
- When vision is obscured, the operator will slow down and sound the horn
- If the load blocks the operator's view, the powered industrial truck will be driven in the direction that provides the best visibility
- The powered industrial truck will cross railroad tracks at a diagonal
- The powered industrial truck will be parked 8 feet or further from the center line of the railroad tracks
- The operator will keep a clear view of the path of travel
- The loaded powered industrial truck will be driven with the load upgrade when driving on ascending or descending grades greater than 10%
- Dock boards and bridge plates will be properly secured before they are driven over
- When the forklift is not carrying a load, the operator will travel with the forks as low as possible (maximum of 3 inches on paved surfaces). When carrying a load, it will be carried as low as possible (consistent with safe operation, 2 to 6 inches above the surface)
- The forks will not be operated while the forklift is traveling
- On a downgrade, the load will be to the rear, and the forks raised only enough to clear the surface
- On an upgrade, the load will be ahead, and the forks raised only enough to clear the surface

Forklift Daily Inspection Checklist:

KEY OFF Procedures

The vehicle inspection

- Overhead guard
- Hydraulic cylinders
- Mast assembly
- Lift chains and rollers
- Forks
- Tires
- Gas gauge
- Check the engine oil level
- Examine the battery
- Inspect the hydraulic fluid level
- Check the engine coolant level

KEY ON Procedures

Test the standard equipment

- Front, tail, and brake lights
- Fuel gauge (if diesel)
- Windshield wiper
- Heater

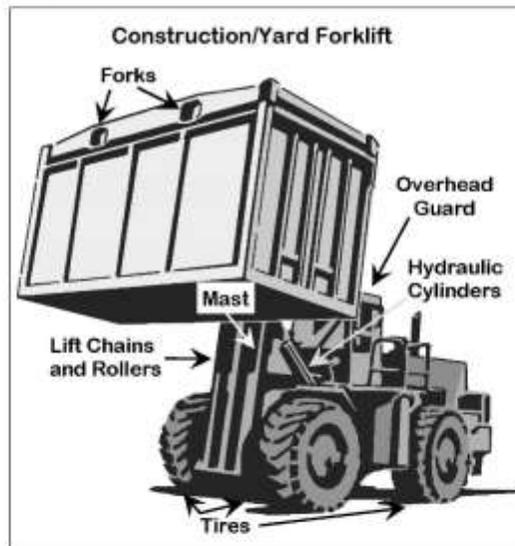
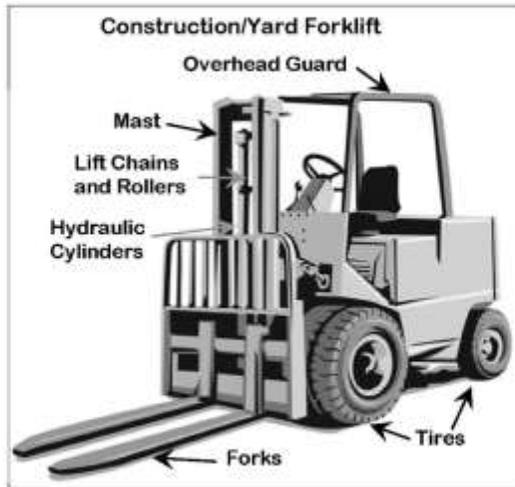
ENGINE RUNNING Procedures

Check the gauges

- Oil pressure indicator lamp
- Ammeter indicator lamp
- Ammeter
- Hour Meter
- Water Temperature Gauge

Test the standard equipment

- Steering
- Brakes
- Horn
- Safety seat (if equipped)
- Check the transmission fluid level
- Check the operation of load-handling attachments



Comments/Observations: _____

Printed name and signature of person(s) conducting inspection _____ Date _____

Printed name and signature of person(s) conducting inspection _____ Date _____

Performance Evaluation for Forklift Operators

Employee: _____ Date: _____ Time: _____

Evaluator: _____ Equipment Type: _____

YES NO

- Shows familiarity with truck controls.
- Gave proper signals when turning.
- Slowed down at intersections.
- Sounded horn at intersections.
- Obeyed signs.
- Kept a clear view of direction of travel.
- Turned corners correctly - was aware of rear end swing.
- Yielded to pedestrians.
- Drove under control and within proper traffic aisles.
- Approached load properly.
- Lifted load properly.
- Maneuvered properly.
- Traveled with load at proper height.
- Lowered load smoothly/slowly.
- Stops smoothly/completely.
- Load balanced properly.
- Forks under load all the way.
- Carried parts/stock in approved containers.
- Checked bridge-plates/ramps.
- Did place loads within marked area.
- Did stack loads evenly and neatly.
- Did drive backward when required.
- Did check load weights.
- Placed forks on the ground when parked, controls neutralized, brake on set, power off.
- Followed proper instructions for maintenance - checked both at beginning and end.

Comments: _____

Total Rating: Excellent Good Fair Poor Fail

Evaluator's Signature Date

Operator's Signature Date

Certification of Forklift Operator Training

The Company certifies that the following employee has been trained and has demonstrated competence in the following areas of powered industrial truck operations:

Truck-related topics:

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate.
- Differences between the truck and an automobile.
- Truck controls and instrumentation: where they are located, what they do, and how they work.
- Engine or motor operation.
- Steering and maneuvering.
- Visibility (including restrictions due to loading).
- Fork and attachment adaptation, operation, and use limitations.
- Vehicle capacity.
- Vehicle stability.
- Any vehicle inspection and maintenance that the operator will be required to perform.
- Refueling and/or charging and recharging of batteries.
- Operating limitations.
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

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 vehicle will be operated.
- Narrow aisles and restricted areas that the vehicle will be operated.
- Hazardous (classified) locations where the vehicle will be operated.
- Ramps and sloped surfaces that could affect the vehicle's stability.
- Closed environments and other areas where insufficient ventilation or poor vehicle 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.

Employee Name: _____

Name of Trainer: _____

Signature of Trainer: _____

Date of Training: ___/___/___ **Date of Evaluation:** ___/___/___

POLICY

Specialized Storage Systems, Inc has adopted this policy to inform employees of the General Waste Management Plan. This ensures the safety and health of the employees.

David Cali is responsible for ensuring that the following policy is enforced.

WASTE TYPES

- **Listed Wastes:** Wastes that EPA has determined are hazardous. The lists include the F-list (wastes from common manufacturing and industrial processes), K-list (wastes from specific industries), and P- and U-lists (wastes from commercial chemical products)
- **Characteristic Wastes:** Wastes that do not meet any of the listings above but that exhibit ignitability, corrosivity, reactivity, or toxicity
- **Universal Wastes:** Batteries, pesticides, mercury-containing equipment (e.g., thermostats) and lamps (e.g., fluorescent bulbs)
- **Mixed Wastes:** Waste that contains both radioactive and hazardous waste components
- **Construction Wastes:** Building materials such as bricks, concrete, wood, insulation, nails, electrical wiring, and rebar, as well as waste originating from site preparation such as dredging materials, tree stumps, and rubble. Construction waste may contain lead, asbestos, or other hazardous substances
- **Medical and Infectious Wastes:** Waste generated by health care activities includes a broad range of materials, from used needles and syringes to soiled dressings, body parts, diagnostic samples, blood, chemicals, pharmaceuticals, medical devices and radioactive materials

PROCEDURES

Waste Estimation

Prior to the commencement of work, it is the policy of the company to ensure that an estimation of the wastes, trash and scrap materials that will be generated is conducted. This will be performed so the need for containers, and waste removal, if necessary, can be determined.

Waste Disposal

The company will coordinate with the project or site owner to ensure the proper disposal of wastes or scrap materials. The company will ensure that the owner is aware of whether wastes and scrap materials will be taken off site or will be disposed of on the owner's site.

Safety Hazards

The company» will ensure safe practices related to the immediate storage and handling of waste, scrap, or left over materials are carried out. Always be aware of what you are handling. The proper Personal Protective Equipment (PPE) will be used before handling.

Handling, Organization, and Storage

Specialized Storage Systems, Inc will ensure that waste materials will be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.

It is the policy of Specialized Storage Systems, Inc that all types of waste or scrape materials generated will be stored properly and in an organized fashion.

Specialized Storage Systems, Inc ensures project-related wastes will be stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees. Proper waste receptacles will be provided for trash and materials that may be reused or recycled during a project.

Proper Methods of Disposal

It is the policy of Specialized Storage Systems, Inc to ensure all employees are instructed in the proper method to dispose of wastes.

Employees of Specialized Storage Systems, Inc will be instructed the general disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees will be trained to ensure proper disposal.

Waste Segregation

Specialized Storage Systems, Inc is committed to encouraging employees to properly segregate waste or scrap materials to ensure the opportunity for reuse or recycle.

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TRAINING RECORD

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

POLICY

Specialized Storage Systems, Inc has implemented this policy to ensure no employee is exposed hazards caused by improper or unsafe use of hand and portable powered tools. Specialized Storage Systems, Inc will provide instruction and training by a Competent Person for each employee using any such tool. The program will enable each employee to recognize hazards related to hand and portable powered tool use and will train each employee in the procedures to be followed to minimize these hazards.

REFERENCES

- §1910.241 – Hand and Portable Powered Tools and Other Hand-Held Equipment
- §1926.300 – Tools - Hand and Power

RESPONSIBILITIES

Employer Responsibilities

Specialized Storage Systems, Inc is responsible for:

- Ensuring that hand tools and portable powered equipment outside of the facility are inspected on a regular basis
- Ensuring each employee has been trained or instructed by a competent person in the following areas, as applicable:
 - All hand and power tools and similar equipment, whether furnished by Specialized Storage Systems, Inc or the employee, will be maintained in a safe condition
 - Any tool not in compliance with any applicable OSHA requirements is prohibited. Such tools will either be identified as unsafe by tagging or locking the controls to render them inoperable, or the defective tool will be physically removed from its place of operation
 - When power operated tools are designed to accommodate guards, they will be equipped with such guards when in use
 - Guards shall be in place and operable at all times while the tool is in use. The guard may not be manipulated in such way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in American National Standards Institute (ANSI) B15.1
 - Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases will be provided with the appropriate Personal Protective Equipment (PPE) necessary to protect them from the hazard
 - Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment will be guarded if such parts are exposed to contact by employees or otherwise create a hazard
 - One or more methods of machine guarding will be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips, and sparks. The point of operation of machines whose operation exposes an employee to injury, will be guarded

- All fuel powered tools will be stopped while being refueled, serviced, or maintained. When fuel powered tools are used in enclosed spaces, the applicable PPE requirements for hazardous atmospheres will apply. Responding quickly to eliminate workplace hazards; ensuring all equipment is kept in good repair; ensuring employees follow safe job procedures; and reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Safety Committee Responsibilities

It is the responsibility of the safety committee to:

- Assist in hand tool and portable powered equipment inspections
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

All employees are expected to:

- Inspect hand tool and portable powered equipment before use
- Remove defective hand tool and portable powered equipment
- Follow safe job procedures
- Report hazards to a supervisor immediately

SAFE PRACTICES

General Power Tool Use

- Do not allow anyone to use power tools that has not been properly instructed and approved in the processes of safe operation
- Be familiar with your power tools. When using a new tool, or one that is foreign to you, take some time to “test-run” it and get a feel for its performance. Read and understand the operator’s manual and follow its instructions. Prior to its use, do a visual and operational inspection to ensure safe mechanical function
- Eye protection is extremely important and must always be worn when using power tools. When operations present potential eye injuries, adequate and appropriate protection must be selected. Use a face shield, protective goggles, or approved safety glasses depending on the job performed
- Hearing protection is required due to the extreme noise levels generated, especially during extended operating sessions
- Depending on the material being cut, gloves can be helpful and a respirator or dust mask may be required
- Wear clothing appropriate for power tools use; avoid long, loose shirtsleeves, neckwear, or untied long hair
- Check that the electrical circuit to be used is of the proper rating and that cords, plugs, and fittings are intact and secure. All power tools must be grounded unless they are double insulated
- Use only extension cords that are free of splices, taps, bare wires, or frayed and deteriorated insulation. Use 3-prong adapters

- Ensure all power tools are equipped with proper shields and guards, as recommended by the manufacturer. The guards are designed and engineered for the operator's safety
- Operate only properly maintained equipment. Check that spring-loaded on/off trigger switch functions properly
- If any operational problems are noted, remove the power tools from service and get it repaired immediately
- When repairing tools, changing blades, bits and/or cutters, disconnect the power source
- Remove chuck-keys or arbor wrenches before using the tool
- When possible, always secure your work on a stable platform using clamps or vices
- Unsafe practices and inadequate housekeeping create potentially dangerous work-zones; keep the work area free of trip hazards such as tangled power cords, cluttered material, scraps, bricks, or other obstacles and obstructions
- Be aware of your surroundings and always on the lookout for hazards. Avoid using power tools in a wet environment
- Always use the proper tool for the job. store tools in a dry, secure location

Powder-Actuated Tools

Specialized Storage Systems, Inc employees are required to follow these general requirements for safe powder-actuated tool use:

- Operators and assistants using tools must use eye, head, and face protection as required by working conditions
- Inspect the tool before use to ensure that it is clean, that all moving parts are free, and that the barrel is free of debris or obstructions
- The muzzle end of the tool must have a guard at least 3 ½" in diameter to confine any flying fragments that might create a hazard
- If a tool is defective, it must be taken out of use until it is properly repaired
- Tools are to remain unloaded until they are to be used
- Never point a tool, loaded or unloaded, at anyone
- In case of a misfire, the tool must be held in the operating position for at least 30 seconds, tried a second time, then wait another 30 seconds before unloading in strict accordance with manufacturer's instructions. Never leave a tool unattended where it would be available to unauthorized personnel
- Fasteners must not be driven into exceptionally hard materials such as cast iron, glazed tile, hardened steel, glass block, or rock
- A backing must be used on soft materials to prevent fastener from passing completely through and becoming a flying hazard
- Fasteners must not be driven through an existing hole unless means of positive alignment is available
- Fasteners may not be driven into a cracked or fractured area caused by a previous fastener
- Tools must not be used in an explosive or flammable atmosphere

Requirements for loads and fasteners:

- There must be a standard means of identifying the power level of loads being used in the powder actuated tools
- No load may be used in excess of design specifications for a low velocity tool
- Fasteners used in tools must be only those designed to be used in such tools

Circular Saws

Specialized Storage Systems, Inc employees are required to follow these safety guidelines when using a circular saw:

- Eye protection is extremely important and must always be worn when using circular protection must be selected. Use a face shield, protective goggles, or approved safety glasses depending on the job to be performed
- Hearing protection may be required due to the extreme noise levels generated, especially during extended use
- A respirator or dust mask may be required, depending on the material being cut
- Do not wear loose clothing, long-sleeves, or gloves while operating a circular saw
- Check that the electrical circuit to be used is of the proper rating and that cords, plugs, and fittings are intact and secure
- Circular saws must be grounded unless they are double insulated
- Use only extension cords that are free of splices, taps, bare wires, or frayed and deteriorated insulation. Do not use extensions over 100 ft. long due to the power drop. Operate only properly maintained equipment. Check that the spring-loaded on/off trigger switch functions properly. If any operational problems are noted, remove the circular saw from service and get it repaired immediately
- Be aware of your surroundings and always on the lookout for hazards. Avoid using circular saws in a wet environment
- Always cut material on an elevated work platform. Never attempt to cut any material lying on the ground or by simply holding the material in your opposite hand
- Be aware of the position of the cord. Always clear the cord before making the cut
- Inspect all material prior to cutting. Look for defects such as knots in the wood, nails and screws, or any obstruction that may impede the cut
- Always inspect the saw prior to operation, ensuring the blade is tight and guards are fully functional
- Never pin back or otherwise disable the retractable guard
- Unplug the saw when changing blades or making adjustments for depth or angle
- After tightening the blade or making other adjustments, be sure to remove wrench before operating the circular saw
- Maintain the saw and use only sharp blades or non-defective abrasive wheels free of distortion, cracks, or heat damage. A ring test will be performed on blades prior to installation to determine soundness
- Always store and discard saw blades in a safe responsible manner
- When the saw is not in use unplug the saw and place the saw out of the way with the blade facing down
- Always use the proper tool for the job. When not in use, store circular saws in a dry, secure location

Miter Saws

Specialized Storage Systems, Inc employees are required to follow these safety guidelines when using a miter cut-off (chop) saw:

- Do not ever, under any circumstances, allow anyone to use a chop saw that has not been properly instructed and approved in the processes of its safe operation

- Prior to its use, do a visual and operational inspection to ensure safe mechanical function of the saw:
 - Make certain all blade guards are in place and working smoothly. Removing or pinning back guards is not only extremely hazardous; it is considered a serious safety violation
 - Check the blade to be sure that it is straight and the arbor bolt is tight
 - Ensure the “constant-pressure” trigger switch operates properly
 - Check that the electrical cords, plugs, and fittings are intact and secure. Frayed cords are not permissible
 - Be sure that arbor wrenches or keys were not inadvertently left behind on the machine during a blade change
- When setting-up the cutting station, it is important that the saw is positioned in a manner that the work piece’s point of contact with the cutting edge can be easily viewed without straining or stooping
- Make sure the work-zone is level and free of trip hazards such as tangled power cords, cluttered material piles, scraps, stones, bricks, or other obstacles and obstructions. Avoid unsafe distractions by setting up away from high traffic areas
- Ensure the saw’s table or platform being used is stable and does not wobble. Be sure that accessory benches (for cutting long stock) are steady and sturdy; get assistance when needed
- During cuts, keep blade speeds at recommended levels; over-pressure on cuts will create hazardous situations
- Hearing protection is required due to the extreme sonic and acoustical levels generated, especially during extended cutting
- Eye protection must always be worn when using a chop saw
- Depending on the material being cut, a dust mask may be required
- Wear clothing appropriate with chop saw use; avoid long, loose shirtsleeves, neckwear, or untied long hair
- If any operational problems are noted, remove the saw from service and get it repaired immediately
- Proper care and maintenance should always be given the saw. Damage usually occurs during careless transport, handling, and storage of the tool
- Allow only qualified personnel to make repairs to the saw

Drills

- Do not allow anyone to use an electric drill that has not been properly trained in the processes of safe portable drilling operations
- Operate only properly maintained equipment. Before use, carefully inspect the machine for defects that could cause malfunctions. Ensure the power cord is secure and intact, trigger switch functions properly, and that fasteners and attachments are tight and fitted. Operate the tool using both hands and follow the manufacturer’s operating instructions
- Eye protection must always be worn when doing overhead operations. When operations present potential eye injuries, appropriate protection must be selected. Depending on the task, use a face shield, protective goggles, or approved safety glasses
- When using a new or unfamiliar tool, take time to “test-run” it
- Wear clothing appropriate for drilling or boring; avoid long, loose shirtsleeves, neckwear, or untied long hair
- The electrical circuit is properly rated and that cords, plugs, and fittings are intact and secure

SPECIALIZED STORAGE SYSTEMS, INC HSE

- Use only extension cords that are free of splices, taps, bare wires, or frayed and deteriorated insulation. Use 3-prong adapters
- Select the correct drill and bit for the job and mount it securely in the chuck. Avoid using bits that are dull or bent
- When possible, always secure your work on a stable platform using clamps or vices. The work-piece must be secured so it does not move
- Prior to beginning drilling operations, inspect each work piece for nails, knots, or flaws that could cause the tool to buck or jump
- Turn on the switch for a moment to see if the bit is properly centered and running true
- With the switch off, place the point of the bit in the punched layout or pilot hole
- Hold the drill firmly in one or both hands and at the correct drilling angle
- Turn on the switch and feed the drill into the work-piece. The pressure required will vary with the size of the drill, the diameter of the drill bit, and the kind of material being drilled
- During operation, keep the drill aligned with the direction of the hole. Keep your free hand away from point of operation
- If any operational problems are noted, remove the drill from service and get it repaired immediately
- work-zones; keep the work area free of trip hazards such as tangled power cords, cluttered material, scraps, stones, bricks, or other obstacles When repairing tools or changing bits, always disconnect the power source
- Unsafe practices and inadequate housekeeping create potentially dangerous and obstructions.
- Be aware of your surroundings and always on the lookout for hazards. Avoid using electric drills in a wet environment

Portable Abrasive Wheels

Specialized Storage Systems, Inc employees are required to follow these safety guidelines when using handheld grinders or other portable abrasive wheels:

- Employees using grinding tools and/or are exposed to the hazards of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, or vapors will be provide with, and compelled to use, the particular personal protective equipment necessary to protect them from the hazard. This equipment includes eye and face, respiratory, hearing, and hand protection and will be properly maintained to meet all applicable standards
- All power grinding tools will be maintained in a safe condition. When these tools are designed to accommodate guards, they will be in place when the tool is in use. Safety guards will be strong enough to retain flying fragments and withstand the effects of a bursting wheel
- All grinding machines will be supplied with sufficient power to maintain safe spindle speeds under normal operating conditions
- All abrasive wheels will be carefully inspected and “ring-tested” before mounting to ensure that they are free from cracks or defects. To perform a sound or ring test, wheels should be tapped gently with a light, non-metallic instrument. If they sound cracked or dead, they could fly apart during operations and should be discarded. An intact, undamaged wheel will give a clear metallic tone or “ring”
- Only portable grinders with wheels 2 inches in diameter or less may be equipped with a positive on/off control switch. Grinders with wheels greater than 2 inches in diameter will be equipped with a momentary contact on/off switch and may have a lock-on control
- Grinders will be used on a 3-wire grounded circuit or be of the approved double insulated type. Using the tool’s power cord for hoisting or lowering will not be permitted

- All grinding/cutting wheels will fit freely on the spindle and must not be forced on. The spindle nut will be tightened only enough to hold the wheel in place
- When grinding metal, it is easy to leave razor-sharp edges; be sure you take them off before walking away from a work piece

Pneumatic Nailers and Staplers

- Never allow anyone to operate these tools without proper instruction in safe use
- Appropriate PPE must be worn when using compressed air tools and equipment
- Pneumatic powered tools must be secured to the hose by some positive means to prevent the tool from becoming accidentally disconnected
- All pneumatically powered nailers, staplers, or other similar equipment with automatic feed, that operate at over 100 psi at the tool, must have a safety device on the muzzle to prevent the tool from cycling and ejecting fasteners, unless the muzzle is in contact with the work surface
- Don't use compressed air to clean except where pressure is reduced to less than 30 psi
- The manufacturer's safe operating pressure for hoses, pipes, valves, filters, and other fittings must not be exceeded
- Avoid horseplay when using "air guns"
- Leave all safety features intact
- Always wear appropriate eye protection when using any air gun
- Hearing protection is often required depending on the noise level
- Read the owner's manual and operate the tool according to manufacturer's guidelines
- Ensure that tools are properly maintained and are in good working condition
- Never exceed manufacturer's recommended working pressures and never use more pressure than necessary (seldom more than 90 – 95 psi). Excessive pressure exerts more force, causing harder cycles. It is hard on tools and generates more flying debris
- Always keep the nose of the tool pointed toward the work-piece or downward when air charged. Never point the tool towards yourself or others
- During use, hold the nose of the gun firmly against the work-piece
- Ensure all safety features are intact and operational
- Always disconnect tool from air supply when clearing a jam or when not in use. Keep hoses and fittings in good condition
- Never carry an air-gun with your finger on the trigger. Accidental discharge and injury may result
- Tie-off and secure the air hose when working on a roof or scaffold to prevent the tool from falling on others
- Always move forward when working a nailer or stapler on a roof so you do not inadvertently trip or fall from the roof
- Never use volatile bottled gas to operate pneumatic fasteners or operate air guns around flammables; sparks may cause a fire
- Keep your free hand clear of air gun's nose during use
- Safety clips or retainers must be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled

Air Compressors

Specialized Storage Systems, Inc employees are required to follow these safety guidelines while operating air compressors:

- Every air receiver must be equipped with a pressure indicator gauge with one or more spring loaded safety valves
- Pressure gauges must be located so as to be readily visible
- The pressure relief safety valves may not exceed the rated working pressure of the air receiving tank
- No valve of any type may be placed between the safety valve and the air receiver
- Safety valves, pressure gauges, regulators, and other controlling devices must be designed and installed so that they cannot be easily rendered inoperative by any means, including weather elements
- All safety valves must be tested at frequent intervals to determine proper operating condition
- A drainpipe and valve must be installed at the lowest point of any air receiver to provide for the frequent and complete removal of accumulated oil and water
- Never install compressors on an unrated air tank. The air receiver tank must be rated equal to or higher than original equipment
- If pressure gauges or pressure relief valves are damaged, replace them with compatible equipment before using the compressor
- If a compressed air storage tank is dented, deeply gouged, or badly rusted, compressor must be removed from service
- Do not use compressed air to pressurize barrels, pipes, or other containers not designed or intended as pressure vessels
- If an air receiver is equipped with a quick connect/release fitting, make sure the lock collar is fully engaged when hose is connected. When the hose is released from the fitting, firmly grasp the hose close to the fitting before releasing the lock collar
- Before servicing a compressor, disconnect it from the power source and bleed the pressure from the tank. Use appropriate Lockout Tagout (LOTO)
- Pulleys and belts on compressor motors and pumps must be properly guarded
- If using a gas powered compressor, engine must be shut off before refueling
- If an electric powered compressor, check power cord for cuts and abrasions, if the cord, plug, or any components are damaged, replace before use

Hand Tools

- Damaged, worn-out, or defective tools should be tagged and removed from service
- Do not perform "make-shift" repairs to tools
- Never use a tool if its handle has splinters, burrs, cracks, splits or if the head of the tool is loose
- Do not use impact tools such as hammers, chisels, punches or steel stakes that have mushroomed heads
- When handing a tool to another person, direct sharp points and cutting edges down and away from yourself and the other person
- Carry all sharp tools in a sheath or holster. Do not carry sharp or pointed hand tools such as screwdrivers, utility knives, scribes, snips, scrapers, chisels or files in your pocket unless the tool is sheathed. Transport hand tools only in toolboxes or tool belts
- Use tied off containers to keep tools from falling off scaffolds and other elevated work platforms

- Avoid carrying tools in your hand when you are climbing. Carry tools in tool belts or hoist the tools to the work area using a hand line
- Do not throw tools from one location to another or from one employee to another

Hammers: Do not use a hammer if your hands are oily, greasy or wet

- Never strike another hardened steel tool or surface, such as a cold chisel, with a claw hammer
- Avoid striking nails or other objects with the "cheek" of the hammer
- Do not strike one hammer against another hammer
- Never use a hammer as a wedge or a pry bar

Hand Saws: When using a handsaw, hold the work-piece firmly against the work table.

- Do not use an adjustable blade saw, such as a hacksaw or a coping saw, if the blade is not taut
- Avoid using any saw with a dull blade; always keep blades clean and sharp
- Keep hands and fingers away from the point of cut when using any saw
- Never carry a hand saw by the blade

Screwdrivers: Do not use a screwdriver if your hands are wet, oily or greasy.

- Always match the size and type of screwdriver blade to fit the head of the screw
- Never hold the work-piece against your body while using a screwdriver
- Avoid putting your fingers near the blade of the screwdriver when tightening a screw
- Use a drill, nail, or an awl to make a starting or pilot hole for screws
- Do not force a screwdriver by using a hammer or pliers on it
- Never use a screwdriver as a punch, chisel, pry bar, or nail puller
- When performing electrical work, ensure the screwdriver has a properly insulated handle

Pliers: Do not use pliers that are cracked, broken or sprung.

- Never use pliers as a wrench or a hammer
- Do not attempt to force pliers by using a hammer on them
- When you are performing electrical work, use pliers that have properly insulated handles
- When using diagonal cutting pliers, shield the loose pieces of cut material from flying into the air

Wrenches

Specialized Storage Systems, Inc employees are required to follow these safety guidelines when using wrenches:

- Inspect the wrench carefully before use and do not use if damaged
- Discard any wrench that has spread, nicked or battered jaws, or if the handle is loose, broken or bent
- Always use the proper size wrench for the job. A slipping wrench can damage bolt heads and nuts and cause personal injury. Do not use a shim to make a wrench fit the fastener
- Use a wrench that gives a straight, clean pull. If you must push the wrench, use the heel of your hand; do not wrap your fingers around the tool
- Do not cock the wrench in a manner that puts a strain on the points of contact; this can lead to tool failure. Keep the wrench flush with bolt head
- Avoid using a pipe or other "cheater bars" to extend the length of a wrench. Under excessive force, the wrench or bolt can slip or break

- Do not use a hammer with a wrench unless the wrench has been specifically designed for this purpose
- Replace cracked, worn, or “tweaked” wrenches
- Do not attempt to straighten a bent wrench. It will only weaken it further
- Do not substitute slip-joint pliers for a wrench; the pliers can slip and damage the bolt heads and nuts and cause hand injuries
- Sockets designed for use with hand wrenches should not be interchanged on air or impact wrenches; this can result in damage or injury
- When using air impact or other air wrenches, wear eye protection to safeguard against blowing debris. Use only heavy-duty hardened sockets
- Use a torque wrench for tightening only. Never use torque wrenches to break nuts or bolts loose; they are designed to measure tightness
- Be sure the jaws on you pipe wrenches are still sharp as unexpected slippage can cause injury

Jacks—lever and ratchet, screw, and hydraulic

Specialized Storage Systems, Inc employees are required to follow these safety guidelines when using jacks:

- The manufacturer's rated capacity will be legibly marked on all jacks and will not be exceeded
- All jacks will have a positive stop to prevent overtravel
- When it is necessary to provide a firm foundation, the base of the jack will be blocked or cribbed. Where there is a possibility of slippage of the metal cap of the jack, a wood block will be placed between the cap and the load
- After the load has been raised, it will be cribbed, blocked, or otherwise secured at once
- Hydraulic jacks exposed to freezing temperatures will be supplied with an adequate antifreeze liquid
- All jacks will be properly lubricated at regular intervals
- Each jack will be thoroughly inspected at times which depend upon the service conditions. Inspections will be not less frequent than the following:
 - For constant or intermittent use at one locality, once every 6 months
 - For jacks sent out of shop for special work, when sent out and when returned
 - For a jack subjected to abnormal load or shock, immediately before and immediately thereafter
 - Repair or replacement parts will be examined for possible defects
 - Jacks which are out of order will be tagged accordingly, and will not be used until repairs are made

POLICY

Specialized Storage Systems, Inc has implemented this program to ensure employees are informed of any chemical hazards and hazardous or toxic substances in their workplace:

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

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

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

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

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

Container Labeling

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

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

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

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

Specialized Storage Systems, Inc will have specific methods for providing other employer information concerning hazardous chemicals at job sites, methods for providing SDS, methods for precautionary measures to be taken, and methods for providing information on labeling systems. Where employees must travel between sites during a shift, the written program may be kept at a primary job site. If there is no primary site, the program will be sent with employees.

Safety Data Sheets

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

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

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

TRAINING

Required Hazard Communication Training

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

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

Label Elements Training

Specialized Storage Systems, Inc will ensure all employees know the following elements of the labels: product identifier, signal word, pictogram, hazard statement, precautionary statement, and name address and phone number of chemical manufacturer, distributor, or importer.

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

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

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

SDS Training

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

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

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

General Safety Considerations

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

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

Hazardous Non-Routine Tasks

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

Task:	Hazard:

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

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

Notification of Contractors

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

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

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

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

Hazard Communication in the Workplace

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

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

The Hazard Communication Process

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

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

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

Definition of a Hazardous Chemical

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

Chemicals that are Physical Hazards

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

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

Chemicals that are Health Hazards

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

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

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

How to Determine Whether a Chemical is Hazardous

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

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

Commonly-Used Hazardous Chemicals

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

Hazardous Chemical	Harmful Effects
1,1,1-Trichloroethane	May cause mutations in cells; can irritate the skin and eyes and cause unconsciousness and death. High exposures may damage the liver and kidneys.
Acetone	Can irritate the skin, eyes, nose, and throat. High concentrations can cause dizziness and loss of consciousness.
Aluminum oxide	Can irritate the eyes, nose, and throat. Repeated high exposure can cause scarring of the lungs and shortness of breath.
Ammonia	Can irritate the lungs and burn the eyes and skin. Long-term exposure can cause irritation of the eyes, nose, mouth, and throat.
Benzene	A cancer-causing agent that has been shown to cause leukemia. May also cause headaches and irritation of the eyes, nose, and throat. High exposure can cause convulsions and death.
Ethylbenzene	Can irritate the eyes, nose, and throat. Repeated contact can cause drying and scaling of skin and may cause liver damage. High concentrations may cause dizziness and loss of consciousness.
Ethylene glycol	Can irritate the eyes, nose, or throat and cause nausea, vomiting, and headaches. Repeated or high exposure levels can cause kidney damage or stones and brain damage. May cause birth defects.
Freon 113	May cause skin irritation and rashes as well as drowsiness.
Glycol ethers	Can irritate the eyes, nose, and throat and may cause birth defects. Repeated or high exposure can cause kidney damage or stones. Brain damage also may occur.
Hydrochloric acid	Can irritate the lungs. High exposure can cause buildup of fluid in the lungs, which can cause death.
Lead	Can cause weakness and insomnia. Higher exposure can result in damage to the nervous and reproductive systems.
Methanol	Irritates the eyes, nose, mouth, and throat and can cause liver damage.
Methyl ethyl ketone	Can cause dizziness, headaches, blurred vision, and loss of consciousness. May cause birth defects.
Methyl isobutyl ketone	Irritates the skin, eyes, nose, and throat, and may cause dizziness, nausea, diarrhea, and loss of consciousness. Long-term exposure may damage the liver and kidneys.
Phenol	Can irritate the mouth, nose, throat, and eyes. Long-term exposure may damage the liver and kidneys and lead to genetic damage. May be a cancer risk. Major skin contact or inhaling it can cause death.
Sodium hydroxide	Breathing the dust or droplets can irritate and burn the lungs. Contact can cause severe skin burns.
Sulfuric acid	Can severely burn the skin and eyes. Repeated long-term exposure can cause bronchitis, shortness of breath, and emphysema.
Tetrachloroethylene	A suspected human carcinogen that has caused liver cancer in animals. It may damage the liver and kidneys after low but repeated exposure. It can cause dizziness and loss of consciousness.
Xylene	Can irritate the eyes, nose, and throat; high levels can cause loss of consciousness and death. It may damage fetuses. Repeated exposure may damage bone marrow and eyes and cause stomach problems.

Using Safety Data Sheets

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

Responsibilities of Chemical Manufacturers, Importers, and Distributors

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

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

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

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

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

Information required on Safety Data Sheets

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

- Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
- Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.
- Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.
- Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment
- Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.
- Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

- Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.
- Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE)
- Section 9, Physical and chemical properties lists the chemical's characteristics.
- Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.
- Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
- Section 12, Ecological information*
- Section 13, Disposal considerations*
- Section 14, Transport information*
- Section 15, Regulatory information*
- Section 16, Other information, includes the date of preparation or last revision.

* OSHA does not require these sections.

Using Container Warning Labels

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

Containers that Must be Labeled

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

Contents of a Warning Label

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

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

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

EXAMPLE OF ORIGINAL CONTAINER GHS LABEL

SAMPLE LABEL

<p>CODE _____ Product Name _____</p>	}	<p>Product Identifier</p>	
<p>Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____</p>	}	<p>Supplier Identification</p>	<p>Hazard Pictograms</p> 
<p>Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified.</p> <p>In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO₂) fire extinguisher to extinguish.</p> <p>First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.</p>			<p>Signal Word Danger</p>
			<p>Precautionary Statements</p>
			<p>Supplemental Information</p> <p>Directions for Use</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____</p>

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Secondary/Portable Containers

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

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

Labels for secondary containers must include:

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

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

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

Confirmation of Employee's Hazard Communication Training

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

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

Note to employee:

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

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

Employee: _____ Date: _____

Trainer: _____ Date: _____

POLICY

Specialized Storage Systems, Inc has implemented this policy to ensure no employee is exposed to Hydrogen Sulfide (H₂S) at levels in excess of the Permissible Exposure Limit (PEL). This policy is available to all employees request. David Cali is the assigned supervisor responsible for ensuring the following engineering controls and work practices are enforced:

David Cali will provide employees with information and training at the time of their initial assignment to a work area where H₂S is present. Training consist of a minimum of 3 to 4 hours of training and will adhere to the ANSI/ASSE Z390.1-2017 Accepted Practices for Hydrogen Sulfide (H₂S) Training Programs. Training will address characteristics and health effects of H₂S. If exposures are above the action level, employees will be provided with information and training at least annually thereafter. Necessary employee training will be documented to include: identify of the employee trained; the signature and title of the employee trainer; the date of the training.

Employees will be informed of all regulated areas and will be properly trained in entrance procedures, safety requirements, and practices while in regulated areas.

CHARACTERISTICS OF HYDROGEN SULFIDE

H₂S is a colorless, extremely poisonous gas that has the characteristic odor of rotten eggs. The sense of smell becomes rapidly fatigued and cannot be relied upon to warn of the continuous presence of H₂S. Large amounts of H₂S are obtained in the removal of sulfur from petroleum.

Hydrogen Sulfide is:

- Extremely toxic. 100 ppm is the Immediately Dangerous to Life and Health (IDLH) concentration
- Colorless
- Solubility in water at 68 °F is 0.4% by weight
- Flammable Gas
- Incompatible and reacts with strong oxidizers, strong nitric acid, and metals
- UEL (upper explosive [flammable] limit in air) is 44.0% by volume (at room temperature)
- LEL (lower explosive [flammable] limit in air) is 4.0% by volume (at room temperature)

Additional considerations:

- Contact and exposure occurs through inhalation, skin and/or eye contact
- Target organs are the eyes, respiratory system, and central nervous system
- Health effects and symptoms include irritation of the eyes and respiratory system; apnea, coma, convulsions; conjunctivitis, eye pain, lacrimation (discharge of tears), photophobia (abnormal visual intolerance to light), corneal vesiculation (blisters); dizziness, headache, lassitude (weakness, exhaustion), irritability, insomnia; gastrointestinal disturbance
- Affects the nerve centers of the brain which control breathing

Potential employee exposure to Hydrogen Sulfide includes:

- Drilling Operations
- Recycled Drilling Mud
- Water from sour crude wells
- Blowouts
- Tank Gauging (tanks at producing, pipeline, and refining operations)
- Field Maintenance
- Tank batteries and wells, etc.

RESPIRATORY PROTECTION REQUIREMENTS

The Respiratory Protection Program, in compliance with OSHA §1910.134, and respiratory protective equipment is provided at no cost for all employees with potential for exposure to H₂S.

The following National Institute of Occupational Safety and Health (NIOSH) respirator recommendations with their Assigned Protection Factor (APF) will be used under these hazardous conditions:

- H₂S Concentrations up to 100 ppm:
 - Any powered, air-purifying respirator with cartridge(s) providing protection against the compound of concern/(APF = 50)
 - Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted canister providing protection against the compound of concern/(APF = 10)
 - Any supplied-air respirator/(APF = 50)
 - Any self-contained breathing apparatus with a full facepiece
- Emergency or planned entry into unknown H₂S concentrations or IDLH conditions:
 - Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode/(APF = 10,000)
 - Any supplied-air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus
 - Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted canister providing protection against the compound of concern/Any appropriate escape-type, self-contained breathing apparatus/(APF = 50)

Specific Requirements

- In the event of an emergency where H₂S is released at hazardous levels, employees not wearing sufficient Personal Protective Equipment (PPE) for the situation will be immediately evacuated to a safe area until the hazard is contained.
- Adequate ventilation will be ensured in all enclosed work areas. Employees engaged in maintenance of ventilation systems, including filter changes, are required to use proper PPE for the task.
- Regular monitoring of air quality in work areas will be provided to ensure that PEL of H₂S are not being exceeded. Records of all monitoring tests will be kept available at the Company office.
- Employees working at job-sites where there is a potential for exposure to an H₂S hazardous atmospheres will be supplied with personal monitoring equipment which must be carried outside of clothing on the worker at all times when in the work area.
- The supplied monitors will be capable of sensing a minimum of 10 ppm of H₂S in the atmosphere; and will activate audible and visual alarms when the concentration of H₂S in the atmosphere reaches 10 ppm. When monitor alarms sound, employees will vacate the area and will not re-enter without proper respiratory protection.
- In the event that PEL of H₂S are exceeded within any facility where employees are contracted to work, all work will be stopped and employees evacuated until the facility's management can ensure that H₂S levels are brought down to an acceptable level for safe work.
- The management of any facility where Specialized Storage Systems, Inc contracts to work must provide a list of all operations in the facility where H₂S is emitted. Facility management will provide a copy of the facility's contingency plan provisions.
- Special precautions will be taken when employees are working inside tanks or vessels. Employees will adhere to the Specialized Storage Systems, Inc written Confined Space Program per §1910.146 and employees will be trained under §1910.146(g).
- The medical surveillance program for employees who potentially may be exposed to H₂S at or above the action level or PEL will be provided under the supervision of a licensed physician at no cost to the employee.
- Employees must wear proper Personal Protective Equipment (PPE) at all times while in work areas where H₂S is present. This PPE will include proper eye/face protection in accordance with §1910.133 where appropriate.
- All required signs and labels will be posted in areas of potential exposure to H₂S.
- All containers or materials containing H₂S will be appropriately labeled to indicate the contents and the hazards of the contents.
- SDS for H₂S and all hazardous materials at Specialized Storage Systems, Inc are available to employees at the Company office upon request.

HAZARDS OF HYDROGEN SULFIDE

Hazards of Hydrogen Sulfide (H₂S)

Hydrogen Sulfide (H₂S) presents a potential hazard to workers at the work site. It usually occurs as an unwanted by-product and can result in worker exposure in many different industries or occupations. To ensure protection against exposure to H₂S, both workers and employers must be aware of its properties, how it affects the body, and what to do in emergency situations.

Specialized Storage Systems, Inc will ensure that all personnel who will be working at the job site will be properly trained in H₂S awareness and contingency procedures.

H₂S Characteristics

Hydrogen sulfide is a powerful and deadly gas which is colorless and smells like rotten eggs at low concentrations and has a sweet smell at high concentrations. But workers will not rely on the smell as a warning as the gas quickly paralyzes the olfactory nerves which allow you to smell. The result could be instant death. Long exposure to low concentrations will also deaden the sense of smell.

H₂S is explosive - it will ignite and explode when subjected to a spark or ordinary flame - in any concentration from 4% to 44% of the air. It is also soluble in water and oil, so it may flow for a considerable distance from its origin before escaping above ground or in an entirely unexpected place. Because the vapor (gas) is heavier than air, it may travel for a long way until ignited and then flash back towards the source. One of the products of burning H₂S is Sulfur Dioxide, also a toxic gas.

If the gas is burned, toxic products such as sulfur dioxide will be formed. Hydrogen sulfide is incompatible with oxidizing agents, such as nitric acid and chlorine trifluoride, and may react violently or ignite spontaneously.

Sources of H₂S

H₂S is found widely in industry and few workers are warned of its dangers, or their exposure. It is formed by the decomposition of organic materials, so it is found in natural gas and oil, recycled drilling mud, water from sour crude wells, in mines, wells, fertilizers, sewers, and cesspools. It is given off as a by-product in the manufacture of rayon, synthetic rubber, dyes, and the tanning of leather.

Hydrogen sulfide is found in large amounts in natural gas and petroleum. Any worker involved in extracting gas and petroleum from the ground, or in storing, transporting, or processing gas is at risk from exposure to H₂S. Hydrogen sulfide exists in solution in crude oil, and workers are exposed when the gas begins to "pass off" as it reaches the surface or comes into contact with air. This can occur at any point, including all stages of the refining operation, and it is accelerated by heat or hot weather.

Fundamentally, employers and employees must be alert to the fact that working with a "closed system" does not always ensure safety. Operations involving the opening of valves or pumps on otherwise closed systems or working on such equipment that is not isolated or locked out are particular sources of danger. When a normally closed system is opened, the potential exists for releasing hazardous chemicals into the workers' breathing zones in unknown concentrations.

Health Effects on the Body

Hydrogen Sulfide is extremely toxic. When you breathe in H₂S, it goes directly through your lungs and into your bloodstream. To protect itself, your body "oxidizes" (breaks down) the H₂S as rapidly as possible into a harmless compound.

If you breathe in so much H₂S that your body cannot oxidize all of it, the H₂S builds up in the blood and you become poisoned. It may cause death instantaneously in high airborne concentrations. The nervous centers in your brain that control breathing are paralyzed. Your lungs stop working and you are asphyxiated - just as though someone had come up and put their hands around your neck and strangled you.

A single breath of hydrogen sulfide at about 1000 ppm may paralyze the respiratory system and result in coma and death. A worker can be overcome by H₂S and lose consciousness in a few seconds; luckily if he is rescued in time and is given artificial respiration within a few minutes, the worker may recover. Either artificial mouth-to-mouth or an oxygen supply system of resuscitation will work if it is done in time, because, with an adequate source of oxygen and no further H₂S intake, the body will quickly break down the H₂S still in the blood.

Low levels may be extremely irritating to the lungs, nose, throat, and eyes. Hydrogen Sulfide can be detected by smell at levels as low as 0.13 parts H₂S per million parts air (ppm). Odor cannot be used as a warning because the gas can deaden the sense of smell within 2 to 15 minutes in exposures of approximately 100 ppm. Convulsions may also occur. Prolonged exposure at about 250 ppm H₂S may cause the lung tissue to swell and fill up with water (pulmonary edema). This effect may occur after the exposed worker recovers from the irritant effects of the gas. Exposures of 20 to 50 ppm hydrogen sulfide for one hour may cause inflammation of the cornea and the delicate lining of the eye and eyelid (a condition called keratoconjunctivitis). Exposures for long periods at 50 ppm may cause severe irritation of the nose, throat and lungs. Workers exposed to lower concentrations of H₂S may develop headaches, eye disorders, and chronic bronchitis.

Chronic effects

Hydrogen Sulfide can also cause a wide range of sub-acute and chronic effects. At very low concentrations of 10-100 ppm.) headache, dizziness, nausea, and vomiting may develop, together with irritation of the eyes and respiratory tract (the lungs and trachea and bronchi, or air pipes from the nose and mouth to the lungs). The eyes become red, sore, inflamed, and sensitive to light. Respiratory system effects include cough, pain in the nose and throat, and pain on breathing.

If exposure at low levels continues, the worker may develop a state of chronic poisoning. In addition to eye and respiratory tract irritation, there will be a slowed pulse rate, fatigue, insomnia, digestive disturbances, and cold sweats. More dangerous, if exposure at the level of 100 ppm (which results in eye and respiratory tract irritation and drowsiness after 15 minutes) lasts for several hours, it may result in death within the next 48 hours. Symptoms of chronic exposures at low levels are conjunctivitis (eye infections), headache, attacks of dizziness, diarrhea, and loss of weight.

Chronic H₂S intoxication is marked by headaches, eye disorders, chronic bronchitis, and a grey-green line on the gums. Reports of nervous system disorders including paralysis, meningitis, and neurological problems have been reported, but not confirmed.

A study of workers and community residents of a California refinery engaged in extracting sulfur from crude oil, which is rich in H₂S, complained of headaches, nausea, vomiting, depression, personality changes, nosebleeds, and breathing difficulties. When compared to a non-exposed group of people, the exposed people showed abnormalities of color discrimination, eye-hand coordination, balance, and mood disturbances.

Hydrogen Sulfide can penetrate the skin and cause toxicosis in people exposed to large concentrations over long periods. The speed of onset of acute H₂S poisoning and the potency of H₂S are almost the same as for cyanide gas. In rats, exposure to H₂S has caused teratogenic (biological monstrosities and malformations) effects.

Symptoms of H₂S exposure

H₂S is classified as a chemical asphyxiant, similar to carbon monoxide and cyanide gases. It inhibits cellular respiration and uptake of oxygen, causing biochemical suffocation. Exposure levels to H₂S and symptoms of that exposure are divided into different toxicity levels, shown in the chart below.

10 ppm	Beginning eye irritation
50-100 ppm	Slight conjunctivitis and respiratory tract irritation after 1 hour exposure
100 ppm	Coughing, eye irritation, loss of sense of smell after 2-15 minutes. Altered respiration, pain in the eyes and drowsiness after 15-30 minutes followed by throat irritation after 1 hour. Several hours exposure results in gradual increase in severity of these symptoms and death may occur within the next 48 hours.
200-300 ppm	Marked conjunctivitis and respiratory tract irritation after 1 hour of exposure
500-700 ppm	Loss of consciousness and possibly death in 30 minutes to 1 hour.
700-1000 ppm	Rapid unconsciousness, cessation of respiration, and death.
1000-2000 ppm	Unconsciousness at once, with early cessation of respiration and death in a few minutes. Death may occur even if individual is removed to fresh air at once.

Use and operation of H₂S monitoring systems & detection methods used on site

Employees working at jobsites where there is a potential for exposure to hazardous atmospheres, will be supplied with personal monitoring equipment that must be carried outside of clothing on the worker at all times when in the work area. The monitors supplied will be capable of sensing a minimum of 10 ppm of H₂S in the atmosphere; and will activate audible and visual alarms when the concentration of H₂S in the atmosphere reaches 20 ppm. 20 ppm is the acceptable ceiling concentration for H₂S exposure, and 50 ppm is the acceptable maximum peak above the acceptable ceiling concentration for an 8-hour shift with a one-time 10-minute exposure only if no other measured exposure exists.

Alternatively, stationary monitors may be installed. Personal or stationary monitors must be capable of sounding an audible alarm or warning. David Cali will administer the monitor maintenance program for Specialized Storage Systems, Inc. Monitors will be calibrated and maintained per manufacturer's instructions.

Proper use and maintenance of PPE

See Specialized Storage Systems, Inc Policy on respiratory protection. Employees working in areas where the possibility of exposure to toxic gases exists will be provided NIOSH approved full face SCBA respiratory equipment, and trained in their use and maintenance according to the company Respiratory Protection Program which is administered by David Cali. Demonstrated proficiency in using PPE is required by the program.

Locations and use of safety equipment

Personal hazardous atmosphere detection monitors and respiratory protective equipment will be immediately available to each employee at all times in the work area. Safety equipment will be kept immediately available to all employees on the job-site.

All employees of Specialized Storage Systems, Inc must be notified of the location of safety equipment on each jobsite prior to commencement of work. Only personnel trained in the proper use of any required safety equipment will be allowed on the job-site.

Recognition and response to H₂S warnings at the workplace

Specialized Storage Systems, Inc employees at will be required to respond immediately to audio or visual warnings issued either by personal monitoring equipment or established workplace general warning signals. Workplace site-specific contingency plans of the plant owner will be reviewed with personnel and provisions of the plan followed. When a warning signal is sounded, employees must immediately put on SCBA respiratory protection, vacate the area and do not re-enter. Employees will notify or contact necessary personnel and are not permitted to return to the work area until clearance is given for re-entry. Evacuation plans must be established for each work-site prior to commencement of work. David Cali, or the foreman in charge of the job-site, will be responsible for supervision of evacuation procedures, checking for proper use of respiratory protection, ensuring all employees are cleared of the hazard area, notification of the facility management, and assembly and head-count of evacuated personnel at designated safe areas.

Proper rescue and first aid to be used in a H₂S exposure

First aid kit and oxygen will be kept in the supervisor's work vehicle and available to all employees. A litter for transport of incapacitated workers will be provided by Specialized Storage Systems, Inc, and kept on-site, if one is not available from the facility.

In the event an employee is exposed to H₂S, the employee will immediately be evacuated to a safe briefing area, emergency medical services will be notified, and oxygen will be administered, along with cardiopulmonary resuscitation (CPR) if required. Oxygen will be administered regardless of the condition of the victim to ensure a reduction of the absorption concentration of H₂S. If an employee is rendered unconscious due to H₂S exposure, assigned personnel wearing proper SCBA must respond to perform rescue operations of the victim.

Locations of safe briefing areas

Safe briefing areas will be designated outside the work zone for each work location where the possibility of hazardous atmospheres exist. At least two briefing areas will be designated for each work-site. Workers will be notified of these areas prior to the commencement of work. David Cali will be responsible for evaluation and designation of safe briefing areas for Specialized Storage Systems, Inc.

Wind direction awareness and routes of egress

Wind direction will be monitored by David Cali at the beginning of each shift to determine safe egress routes for employees in the event of an evacuation. Wind direction will be regularly checked and noted throughout the work shift for wind shift which will necessarily facilitate a change of egress routes for evacuation. Evacuation routes will be determined for each work area before commencement of work, and routes will be clearly marked and posted in conspicuous areas in the workplace. In the event of an emergency evacuation, David Cali will be responsible for determination and notification of the proper egress route to be used for employee safety.

Confined space and enclosed facility entry procedures

Whenever employees enter a confined space, such as a tank, strict work practices will be followed, including the company permit entry system.

David Cali will ensure that the Specialized Storage Systems, Inc Confined Space Entry program is adhered to, that the air is continually monitored for the presence of H₂S, and that a worker be stationed as a monitor outside of a confined space. Supplied-air respirators, lifelines, and rescue equipment must be immediately available.

See Specialized Storage Systems, Inc Policy on Permit Required Confined Spaces. These procedures will be enforced in all confined work situations.

GAS DETECTORS/MONITORS

Specialized Storage Systems, Inc will ensure each employee will use a portable gas detector as required in all areas where hydrogen sulfide may be present.

The gas monitor will be calibrated per the manufacturer's recommendations. Each monitor will contain a current calibration sticker on the monitor providing the date of calibration.

At the beginning of each day, a bump test is required to be completed on the monitor when in use per the requesting owner client and manufacturer's guidelines. This is to ensure the monitor and alarms are functioning correctly.

Bump Test: Briefly expose the portable detector to a known concentration of gas high enough to set off the alarm. Note the reading to ensure that it is correct. A bump test is not a calibration, but a quick way to ensure that the most important functions of the instrument are intact.

Personal alarm monitors must be set to alarm initially at 10ppm H₂S, and each contractor should wear an H₂S personal alarm monitor when working in all potential H₂S areas.

POLICY

Specialized Storage Systems, Inc has adopted this policy for Injury/Illness Recordkeeping in accordance with OSHA regulations

REFERENCES

- §1904 – Injury / Illness Recordkeeping

RECORDS

It is the policy of Specialized Storage Systems, Inc to keep records of fatalities, injuries, and illnesses that:

- Are work related,
- Is a new case, and
- Meets one or more of the general recording criteria.

It is the policy of Specialized Storage Systems, Inc to enter each recordable injury or illness on an OSHA 300 Log and 301 incident report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

At the end of each calendar year David Cali must examine the OSHA 300 Log and certify that, based on the knowledge of the process by which the information was recorded, that the annual summary is correct and complete. A designated company official must sign the OSHA 300A Summary and make it available for posting. (See §1904.32 (b)(3))

ANNUAL SUMMARY POSTING

Specialized Storage Systems, Inc will post a copy of the annual summary in each facility. The summary must be posted in a conspicuous place or places where notices to employees are customarily posted. Specialized Storage Systems, Inc will ensure that the posted annual summary is not altered, defaced, or covered by other material. The annual summary will be posted no later than February 1st of the year following the year covered by the records. The posting must be kept in place through April 30th.

Specialized Storage Systems, Inc will save the OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 Incident Report Forms for five (5) years following the end of the calendar year that these records cover.

The decision tree for recording work-related injuries and illnesses on the next page shows the steps involved in how to decide whether a particular injury or illness is recordable.

GENERAL RECORDING CRITERIA

Basic Requirement

You must consider an injury or illness to meet the general recording criteria, and therefore to be recordable, if it results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness. You must also consider a case to meet the general recording criteria if it involves a significant injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

Implementation

How do I decide if a case meets one or more of the general recording criteria?

A work-related injury or illness must be recorded if it results in one or more of the following:

- Death. See §1904.7 (b)(2)
- Days away from work. See §1904.7 (b)(3)
- Restricted work or transfer to another job. See §1904.7 (b)(4)
- Medical treatment beyond first aid. See §1904.7 (b)(5)
- Loss of consciousness. See §1904.7 (b)(6)
- A significant injury or illness diagnosed by a physician or other licensed health care professional. See §1904.7 (b)(7)

How do I record a work-related injury or illness that results in the employee's death?

You must record an injury or illness that results in death by entering a check mark on the OSHA 300 Log in the space for cases resulting in death. You must also report any work-related fatality to OSHA within eight (8) hours, as required by §1904.39.

How do I record a work-related injury or illness that results in days away from work?

When an injury or illness involves one or more days away from work, you must record the injury or illness on the OSHA 300 Log with a check mark in the space for cases involving days away and an entry of the number of calendar days away from work in the number of days column. If the employee is out for an extended period of time, you must enter an estimate of the days that the employee will be away, and update the day count when the actual number of days is known.

- Do I count the day on which the injury occurred or the illness began? No, you begin counting days away on the day after the injury occurred or the illness began
- How do I record an injury or illness when a physician or other licensed health care professional recommends that the worker stay at home but the employee comes to work anyway?

You must record these injuries and illnesses on the OSHA 300 Log using the check box for cases with days away from work and enter the number of calendar days away recommended by the physician or other licensed health care professional. If a physician or other licensed health care professional recommends days away, you should encourage your employee to follow that recommendation. However, the days away must be recorded whether the injured or ill employee follows the physician or licensed health care professional's recommendation or not. If you receive recommendations from two or more physicians or other licensed health care professionals, you may make a decision as to which recommendation is the most authoritative, and record the case based upon that recommendation.

How do I record a work-related injury or illness that results in restricted work or job transfer?

When an injury or illness involves restricted work or job transfer but does not involve death or days away from work, you must record the injury or illness on the OSHA 300 Log by placing a check mark in the space for job transfer or restriction and an entry of the number of restricted or transferred days in the restricted workdays column.

- How do I decide if the injury or illness resulted in restricted work? Restricted work occurs when, as the result of a work-related injury or illness:
 - You keep the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work; or
 - A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work.
- What is meant by "routine functions"? For recordkeeping purposes, an employee's routine functions are those work activities the employee regularly performs at least once per week.
- Do I have to record restricted work or job transfer if it applies only to the day on which the injury occurred or the illness began? No, you do not have to record restricted work or job transfers if you, or the physician or other licensed health care professional, impose the restriction or transfer only for the day on which the injury occurred or the illness began.

If you, a physician, or other licensed health care professional recommends a work restriction, is the injury or illness automatically recordable as a "restricted work" case?

No, a recommended work restriction is recordable only if it affects one or more of the employee's routine job functions. To determine whether this is the case, you must evaluate the restriction in light of the routine functions of the injured or ill employee's job. If the restriction from you or the physician or other licensed health care professional keeps the employee from performing one or more of his or her routine job functions, or from working the full workday the injured or ill employee would otherwise have worked, the employee's work has been restricted and you must record the case.

How do I record a case where the worker works only for a partial work shift because of a work-related injury or illness?

A partial day of work is recorded as a day of job transfer or restriction for recordkeeping purposes, except for the day on which the injury occurred or the illness began.

If the injured or ill worker produces fewer goods or services than he or she would have produced prior to the injury or illness but otherwise performs all of the routine functions of his or her work, is the case considered a restricted work case?

No, the case is considered restricted work only if the worker does not perform all of the routine functions of his or her job or does not work the full shift that he or she would otherwise have worked.

How do I handle vague restrictions from a physician or other licensed health care professional, such as that the employee engage only in "light duty" or "take it easy for a week?"

If you are not clear about the physician or other licensed health care professional's recommendation, you may ask that person whether the employee can do all of his or her routine job functions and work all of his or her normally assigned work shift. If the answer to both of these questions is "Yes," then the case does not involve a work restriction and does not have to be

recorded as such. If the answer to one or both of these questions is "No," the case involves restricted work and must be recorded as a restricted work case. If you are unable to obtain this additional information from the physician or other licensed health care professional who recommended the restriction, record the injury or illness as a case involving restricted work.

What do I do if a physician or other licensed health care professional recommends a job restriction meeting OSHA's definition, but the employee does all of his or her routine job functions anyway?

You must record the injury or illness on the OSHA 300 Log as a restricted work case. If a physician or other licensed health care professional recommends a job restriction, you should ensure that the employee complies with that restriction. If you receive recommendations from two or more physicians or other licensed health care professionals, you may make a decision as to which recommendation is the most authoritative, and record the case based upon that recommendation.

How do I decide if an injury or illness involved a transfer to another job?

If you assign an injured or ill employee to a job other than his or her regular job for part of the day, the case involves transfer to another job.

Note: This does not include the day on which the injury or illness occurred.

Are transfers to another job recorded in the same way as restricted work cases?

Yes, both job transfer and restricted work cases are recorded in the same box on the OSHA 300 Log. For example, if you assign, or a physician or other licensed health care professional recommends that you assign, an injured or ill worker to his or her routine job duties for part of the day and to another job for the rest of the day, the injury or illness involves a job transfer. You must record an injury or illness that involves a job transfer by placing a check in the box for job transfer.

How do I count days of job transfer or restriction?

You count days of job transfer or restriction in the same way you count days away from work. The only difference is that, if you permanently assign the injured or ill employee to a job that has been modified or permanently changed in a manner that eliminates the routine functions the employee was restricted from performing, you may stop the day count when the modification or change is made permanent. You must count at least one day of restricted work or job transfer for such cases.

How do I record an injury or illness that involves medical treatment beyond first aid?

If a work-related injury or illness results in medical treatment beyond first aid, you must record it on the OSHA 300 Log. If the injury or illness did not involve death, one or more days away from work, one or more days of restricted work, or one or more days of job transfer, you enter a check mark in the box for cases where the employee received medical treatment but remained at work and was not transferred or restricted.

What is the definition of medical treatment?

"Medical treatment" means the management and care of a patient to combat disease or disorder. For the purposes of Part 1904, medical treatment does not include:

Visits to a physician or other licensed health care professional solely for observation or counseling;

- The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils); or
- "First aid" as defined below.

What is "first aid"?

For the purposes of Part 1904, "first aid" means the following:

- Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes)
- Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment)
- Cleaning, flushing or soaking wounds on the surface of the skin
- Using wound coverings such as bandages, Band-Aids, gauze pads, etc.; or using butterfly bandages or Steri-Strips (other wound closing devices such as sutures, staples, etc., are considered medical treatment)
- Using hot or cold therapy
- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes)
- Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.)
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister
- Using eye patches
- Removing foreign bodies from the eye using only irrigation or a cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Using finger guards
- Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes);
- Drinking fluids for relief of heat stress

Are any other procedures included in first aid?

No, this is a complete list of all treatments considered first aid for Part 1904 purposes.

Does the professional status of the person providing the treatment have any effect on what is considered first aid or medical treatment?

No, OSHA considers the treatments listed above to be first aid regardless of the professional status of the person providing the treatment. Even when these treatments are provided by a physician or other licensed health care professional, they are considered first aid for the purposes of Part 1904. Similarly, OSHA considers treatment beyond first aid to be medical treatment even when it is provided by someone other than a physician or other licensed health care professional.

What if a physician or other licensed health care professional recommends medical treatment but the employee does not follow the recommendation?

If a physician or other licensed health care professional recommends medical treatment, you should encourage the injured or ill employee to follow that recommendation. However, you must record the case even if the injured or ill employee does not follow the physician or other licensed health care professional's recommendation.

Is every work-related injury or illness case involving a loss of consciousness recordable?

Yes, you must record a work-related injury or illness if the worker becomes unconscious, regardless of the length of time the employee remains unconscious.

What is a "significant" diagnosed injury or illness that is recordable under the general criteria even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness?

Work-related cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum must always be recorded under the general criteria at the time of diagnosis by a physician or other licensed health care professional.

Note to §1904.7: OSHA believes that most significant injuries and illnesses will result in one of the criteria listed in §1904.7 (a): death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness. However, there are some significant injuries, such as a punctured eardrum or a fractured toe or rib, for which neither medical treatment nor work restrictions may be recommended. In addition, there are some significant progressive diseases, such as byssinosis, silicosis, and some types of cancer, for which medical treatment or work restrictions may not be recommended at the time of diagnosis but are likely to be recommended as the disease progresses. OSHA believes that cancer, chronic irreversible diseases, fractured or cracked bones, and punctured eardrums are generally considered significant injuries and illnesses, and must be recorded at the initial diagnosis even if medical treatment or work restrictions are not recommended, or are postponed, in a particular case.

POLICY

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

REFERENCES

- §1926.1050 – Ladders and Stairways

RESPONSIBILITIES

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

Employer Responsibilities

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

Safety Committee Responsibilities

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

Employee Responsibilities

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

TRAINING

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

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

SAFE PRACTICES

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

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

Ladders

David Cali will ensure the following requirements are adhered to concerning the use of all ladders:

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

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

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

Stairways

David Cali will ensure the following requirements are applied to all stairways:

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

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

POLICY

Specialized Storage Systems, Inc has implemented this written mobile equipment procedures policy to ensure the safety and health of employees on the jobsite.

REFERENCES

Applicable Mobile Equipment Owner/Operator Manuals

RESPONSIBILITIES

Safe mobile equipment maintenance and operation is a responsibility shared between the Company and its employees.

Employer Responsibilities

- Ensuring that safety inspections of the equipment occur on regular basis
- Ensuring that a operators are trained and safely operate mobile equipment
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Safety Committee Responsibilities

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

Employee Responsibilities

- Only authorized employees will be allowed to operate mobile equipment. Authorization to operate mobile equipment will be issued to the employees who qualify under the appropriate training and proficiency testing
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

David Cali will ensure the following items are covered in operator training:

- Capabilities and limitations of the specific piece of mobile equipment
- Basic maintenance requirements
- Pre-trip inspection requirements
- Operating requirements of mobile equipment including safe loading and unloading
- Use of required personal protective equipment and apparel

Mobile equipment operators will be regularly evaluated on the operation of the mobile equipment they use and retrained as required by legislation and applicable standards.

DEFINITION

Mobile Equipment is a wheeled or tracked vehicle which is engine or motor powered, together with attached or towed equipment, but not a vehicle operated on fixed rails or tracks.

PROCEDURES

Inspections:

At the beginning of each shift, the operator will conduct a pre-shift inspection. The operator will inspect and check the assigned equipment, reporting to his/her supervisor any malfunction of the:

- Clutch
- Braking system
- Steering
- Lighting
- Control system
- Locking/tagging out the equipment if necessary

Operator Requirements:

- The operator will ensure unauthorized personnel will not be permitted to ride on the equipment unless it is equipped to accommodate riders safely
- The operator will ensure the warning signal alarm is operating when the equipment is backing up
- The operator will use the access points provided to get on or off the equipment. The operator will not jump to the ground
- No operator will operate the equipment without the protection of an enclosed cab, or the use of approved eye protection when the equipment does not have an enclosed cab
- The operator will fasten the seat belt and adjust them for a proper fit before starting the engine, and while the equipment is in use
- The operator will not use, attempt to use any vehicle in any manner, or for any purpose other than for which it was designated and intended for
- The operator will not load the equipment/vehicle beyond its established load limit, and will not move the load until the length; width or height of the load has been centered and secured for safe transport

Fueling Procedures:

Operators of a gasoline or diesel vehicle will shut off the engine before filling the fuel tank and will make sure that the nozzle of the filling hose makes contact with the filling neck of the fuel tank. No one will be permitted on the vehicle during fueling operations except as specifically designed.

There will be no smoking or open flames in the immediate area during the fueling operation.

SAFE PRACTICES

All equipment left unattended at night, adjacent to a highway in normal use, or adjacent to construction areas where work is in progress, shall have appropriate lights or reflectors, or barricades equipped with appropriate lights or reflectors, to identify the location of the equipment.

A safety tire rack, cage, or equivalent protection shall be provided and used when inflating, mounting, dismounting tires installed on split rims, or rims equipped with locking rings or similar devices.

Heavy machinery, equipment, or parts thereof, which are suspended or held aloft by use of slings, hoists, or jacks shall be substantially blocked or cribbed to prevent falling or shifting before employees are permitted to work under or between them. Bulldozer and scraper blades, end-loader buckets, dump bodies, and similar equipment, shall be either fully lowered or blocked when being repaired or when not in use. All controls shall be in a neutral position, with the motors stopped and brakes set, unless work being performed requires otherwise.

Whenever the equipment is parked, the parking brake shall be set. Equipment parked on inclines shall have the wheels chocked and the parking brake set.

The use, care and charging of all batteries shall conform to OSHA requirements.

All cab glass shall be safety glass, or equivalent, that introduces no visible distortion affecting the safe operation of any machine covered by this subpart.

Working near Power Lines

All equipment covered under this policy will comply with the following requirements when being moved near power lines or energized transmitters, unless the electrical distribution and transmission lines have been de-energized and visibly grounded at point of work or where insulating barriers, which are not a part of (or an attachment to) the equipment or machinery, have been erected to prevent physical contact with the lines:

- For lines rated 50 kV or below, minimum clearance between the lines and any part of the crane or load shall be 10 feet
- For lines rated over 50 kV, minimum clearance between the lines and any part of the crane or load shall be 10 feet plus 0.4 inch for each 1 kV over 50 kV, or twice the length of the line insulator, but never less than 10 feet
- In transit with no load and boom lowered, the equipment clearance shall be a minimum of 4 feet for voltages less than 50 kV, and 10 feet for voltages over 50 kV, up to and including 345 kV, and 16 feet for voltages up to and including 750 kV
- A person shall be designated to observe clearance of the equipment and give timely warning for all operations where it is difficult for the operator to maintain the desired clearance by visual means

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- Cage-type boom guards, insulating links, or proximity warning devices may be used on cranes, but the use of such devices shall not alter the requirements of any other regulation of this part even if such device is required by law or regulation
- Any overhead wire shall be considered to be an energized line unless and until the person owning such line or the electrical utility authorities indicate that it is not an energized line and it has been visibly grounded
- Prior to work near transmitter towers where an electrical charge can be induced in the equipment or materials being handled, the transmitter shall be de-energized or tests shall be made to determine if electrical charge is induced on the crane. The following precautions will be taken when necessary to dissipate induced voltages:
 - The equipment shall be provided with an electrical ground directly to the upper rotating structure supporting the boom
 - Ground jumper cables will be attached to materials being handled by boom equipment when electrical charge is induced while working near energized transmitters. Crews will be provided with nonconductive poles having large alligator clips or other similar protection to attach the ground cable to the load
- Combustible and flammable materials will be removed from the immediate area prior to operations

POLICY

Specialized Storage Systems, Inc has implemented this policy to ensure no employee is exposed to noise that exceeds the action levels. David Cali is the designated supervisor for ensuring the following engineering controls and work practices will be enforced:

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

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

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

TRAINING

Upon initial hiring, all employees who are exposed to action level noise will be trained in the hazards presented by excessive noise levels in the workplace, and the use and care of hearing protection devices. Training will be repeated annually for each employee and updated to reflect changes in personal protective equipment (PPE) and work processes or requirements. David Cali will make copies of the noise exposure procedures available to affected employees and will also post a copy in the workplace and allow OSHA access to records.

HEARING PROTECTION

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

David Cali will ensure that hearing protectors are worn:

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

AUDIO MONITORING

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

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

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

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

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

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

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

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

Methods of Control

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

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

AUDIOMETRIC TESTING

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

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

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

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

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

- Employees not using hearing protectors will be fitted with hearing protectors, trained in their use and care, and required to use them
- Employees already using hearing protectors will be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary
- Employees will be referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if it is suspected that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors
- Employees will be informed of the need for an otological examination if a medical pathology of the ear that is unrelated to the use of hearing protectors is suspected
- Audiometric evaluation and testing conducted by a licensed physician using the guidelines contained in §1910.95 (g), and is available to all employees whose work requirements equals or exceeds an 8 hr. time-weighted average 85 decibels on a regular basis at no cost to the employee.
- Proctored hearing protector attenuation will be evaluated for the specific noise environments in which the protector will be used. The methods used for measuring attenuation will be one of the four methods described in CCR Title 8, Section 5098, Appendix E
- Hearing protectors must attenuate the noise level to an 8-hour TWA of 90 dBA or less
- For employees who have experienced a standard threshold shift, the attenuation must reduce the sound level to an 8-hour TWA of 85 dBA or less
- Re-evaluation of hearing protectors will be done whenever a workplace noise level increase renders the hearing protector's attenuation inadequate
- Workplaces in which the noise level exceeds 85 dBA will have signs posted. Signs will read "Hearing Protectors Required"

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

RECORDKEEPING

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

These records will also be transferred to any successor employer if Specialized Storage Systems, Inc ceases to do business.

POLICY

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

David Cali is the supervisor responsible for ensuring the following work practices are enforced.

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

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

TRAINING

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

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

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

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

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

HAZARD ASSESSMENT

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

GENERAL REQUIREMENTS

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

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

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

PERSONAL WORK CLOTHING

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

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

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

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

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

EYE AND FACE PROTECTION

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

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

FOOT AND LEG PROTECTION

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

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

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

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

HAND AND ARM PROTECTION

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

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

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

HEAD PROTECTION (HARD HATS)

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

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

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

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

RESPIRATORY PROTECTION

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

HEARING PROTECTION

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

FULL BODY HARNESS AND LANYARDS

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

FLOTATION VESTS

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

TRAFFIC VESTS

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

ELECTRICAL PROTECTION

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

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

POLICY

This policy applies to rigging and slings used in conjunction with other material handling equipment for the movement of material by hoisting. The types of rigging and slings covered are those made from alloy steel chain, wire rope, metal mesh, natural or synthetic fiber rope, and synthetic web.

REFERENCES

- §1926.251 – Rigging Equipment for Material Handling
- §1926.1400 – Cranes and Derricks

RESPONSIBILITIES

Specialized Storage Systems, Inc will enforce, the following work practices and procedures to assure that no employee will be exposed to hazards during rigging and hoisting operations.

David Cali is the Competent Person in authority over all rigging and hoisting operations. David Cali will ensure all safety measures and systems are in place, all safety procedures are adhered to, and ensure regular inspections of the operational site and rigging equipment are made.

Employees are responsible for: inspecting ropes, slings, and hoisting devices before each use and when necessary; removing damaged goods for inspection and permanent removal from service; perform pre-shift visual inspection of curves.

TRAINING

Specialized Storage Systems, Inc will only train and utilize qualified riggers. Specialized Storage Systems, Inc's qualified rigger training combines classroom and exams with hands-on training. The training program will include familiarization with rigging hardware, slings and the rigging basics, along with the procedures and precautions of lifting loads and lift planning safety.

Specialized Storage Systems, Inc employees need to demonstrate proper inspection, use, selection and maintenance of loose gear such as slings, shackles and hooks. Rigging hardware can include: sheaves and blocks; hooks and latches; rings, links and swivels; shackles; turnbuckles; spreader and equalizer beams; cable drops; pad eyes, eyebolts, and other points of attachment.

Sling training includes the sling configuration, angle, and rated load. Types of slings can include: chain, wire rope, metal mesh, natural fiber rope, synthetic fiber rope, or synthetic web.

Specialized Storage Systems, Inc employees need to know the procedures and precautions of: load control and taglines; lift planning including load weight and center of gravity; sling inspection and criteria for rejecting damaged slings; unbinding loads; proper personnel transfer and of course sling handling and storage.

Basic rigging aspects like pinch points and body position, PPE, signals and communication and load stability are also part of the training.

DEFINITIONS

Angle of loading – is the inclination of a leg or branch of a sling measured from the horizontal or vertical plane, provided that an angle of loading of five degrees or less from the vertical may be considered a vertical angle of loading.

Basket hitch – is a sling configuration whereby the sling is passed under the load and has both ends, end attachments, eyes or handles on the hook or a single master link.

Braided wire rope – is a wire rope formed by plaiting component wire ropes.

Bridle wire rope sling – is a sling composed of multiple wire rope legs with the top ends gathered in a fitting that goes over the lifting hook.

Cable laid endless sling-mechanical joint – is a wire rope sling made endless by joining the ends of a single length of cable laid rope with one or more metallic fittings.

Cable laid grommet-hand tucked – is an endless wire rope sling made from one length of rope wrapped six times around a core formed by hand tucking the ends of the rope inside the six wraps.

Cable laid rope – wire rope with six wire ropes wrapped around a fiber or wire rope core.

Cable laid rope sling-mechanical joint – is a wire rope sling made from a cable laid rope with eyes fabricated by pressing or swaging one or more metal sleeves over the rope junction.

Choker hitch – is a sling configuration with one end of the sling passing under the load and through an end attachment, handle or eye on the other end of the sling.

Coating – is an elastomer or other suitable material applied to a sling or to a sling component to impart desirable properties.

Cross rod – is a wire used to join spirals of metal mesh to form a complete fabric.

Female handle (choker) – handle with a handle eye and a slot that permits passage of a male handle thereby allowing the use of a metal mesh sling in a choker hitch.

Handle – is a terminal fitting to which metal mesh fabric is attached.

Handle eye — is an opening in a handle of a metal mesh sling shaped to accept a hook, shackle or other lifting device.

Hitch –The sling is fastened to an object or load, either directly to it or around it.

Link — is a single ring of a chain.

Male handle (triangle) – is a handle with a handle eye.

Master coupling link – is an alloy steel welded coupling link used as an intermediate link to join alloy steel chain to master links.

Master link or gathering ring – is a forged or welded steel link used to support all members (legs) of an alloy steel chain sling or wire rope sling.

Mechanical coupling link – is a non-welded, mechanically closed steel link used to attach master links, hooks, etc., to alloy steel chain.

Proof load – is the load applied in performance of a proof test.

Proof test – is a nondestructive tension test performed by the sling manufacturer or an equivalent entity to verify construction and workmanship of a sling.

Rated capacity or working load limit – is the maximum working load permitted by the provisions of this section.

Reach – is the effective length of an alloy steel chain sling measured from the top bearing surface of the upper terminal component to the bottom bearing surface of the lower terminal component.

Spiral – a single transverse coil that is the basic element from which metal mesh is fabricated.

Strand laid endless sling-mechanical joint – is a wire rope sling made endless from one length of rope with the ends joined by one or more metallic fittings.

Strand laid grommet-hand tucked – is an endless wire rope sling made from one length of strand wrapped six times around a core formed by hand tucking the ends of the strand inside the six wraps.

Strand laid rope – is a wire rope made with strands (usually six or eight) wrapped around a fiber core, wire strand core, or independent wire rope core (IWRC).

Vertical hitch – is a method of supporting a load by a single, vertical part or leg of the sling.

TYPES OF SLINGS

- Alloy Steel Chain Slings
- Wire Rope Slings
- Metal Mesh Slings
- Natural and Synthetic Fiber Rope Slings
- Synthetic Web Slings
- Synthetic Round Slings

SAFE PRACTICES

Improper rigging of a load or a rigging failure can expose riggers and other workers nearby to a variety of potential hazards. Riggers have been injured or killed when loads have slipped from the rigging, or when the rigging has failed. Therefore all loads must be safely rigged, including adequate welds on pad eyes (page C-8) prior to a lift.

The following are topics that should be discussed with workers prior to beginning rigging operations:

- Hazards associated with rigging operations
- Role and responsibility of each rigger's assigned task
- Establishing a goal for the day
- Weight of material and equipment being hoisted
- Identifying the various shapes on the surface of equipment being hoisted
- Lifting limitations of gear and hoisting devices
- Communication used by all personnel
- Disconnecting techniques used to complete the task

NOTE: A planning meeting will be held with the operator and the other workers who will be in the area of the equipment or load to review the location of the power line(s) and the steps that will be implemented to prevent encroachment or electrocution.

Rigging Equipment

- Rigging equipment will not be loaded in excess of its recommended safe working load, as prescribed for the specific equipment and load rating identification will be attached to the rigging apparatus or equipment
- Rigging equipment, when not in use or when found to be defective, will be removed from the immediate work area so as not to present a hazard to employees
- Tag lines will be used unless their use creates an unsafe condition
- Hooks with self-closing safety latches or their equivalent will be used to prevent components from slipping out of the hook

Working under Suspended Loads

All employees shall be kept clear of loads about to be lifted and of suspended loads. Routes for suspended loads will be pre-planned to ensure that no employee is required to work directly below a suspended load except for:

- Employees engaged in the initial connection of the steel
- Employees necessary for the hooking or unhooking of the load

When working under suspended loads, the following criteria will be met:

- Materials being hoisted will be rigged to prevent unintentional displacement
- Hooks with self-closing safety latches or their equivalent will be used to prevent components from slipping out of the hook
- All loads will be rigged by a qualified rigger

General Safety Considerations

- Lifting equipment with missing or illegible labels shall be removed from service
- Wire rope U-bolt clips are the correct size and spaced properly
- Slings and other detachable rigging hardware shall be stored in an area where they will not be subjected to mechanical damage, corrosive action, moisture, extreme temperatures, sunlight (primarily synthetic materials), or kinking
- Alloy steel chain slings will have permanently affixed, durable identification stating the size, grade, rated capacity, and reach
- The use of makeshift links or other fasteners formed from bolts or rods is prohibited
- Slings must be of original length without the use of knots, bolts, or other devices to shorten them
- If a basket hitch is used, the load must be balanced to prevent slippage
- Slings will be padded or otherwise protected from sharp edges of their loads
- The repair of fiber rope slings is prohibited

POLICY

Specialized Storage Systems, Inc has adopted this policy for Subcontractor Management from industry standards and best practices.

RESPONSIBILITIES

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

PROCEDURES

Prequalification

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

Selection

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

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

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

Pre-Job

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

On-Site

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

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

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

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

Injury/Illness Recordkeeping

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

Post-Contract

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

Management of Change

Specialized Storage Systems, Inc will conduct a hazard assessment when a change occurs in the construction plan or external influences impact the manner in which the work will be conducted.

This includes, but is not limited to:

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

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

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

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

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

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

OPEN LETTER TO ALL SUBCONTRACTORS

Date: _____

Greetings Prospective Subcontractor:

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

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

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

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

TO:

Company _____

Attn _____

Address _____

City/State/Zip _____

Phone _____

Fax _____

Email _____

Regards,

Construction Manager

SPECIALIZED STORAGE SYSTEMS, INC HSE

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 1 OF 4)

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 2 OF 4)

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 3 OF 4)

11. Please respond to all items below with YES, NO, or N/A (not applicable). Do not leave any items unanswered.				
OSHA Programs/Training	Program Written and Documented?	Training Conducted By (In-House or Outsourced)	Frequency of Employee Training	Documented Individual Employee Training?
OSHA Programs				
Confined Spaces				
Electrical Safety (qualified)				
Electrical Safety (non-qualified)				
Excavation and Shoring				
Fire Protection and Prevention				
Fall Protection				
First Aid/CPR				
HAZCOM				
Heat Stress Prevention				
Lifting/Mobile Equipment				
Lockout/Tagout				
Noise/Hearing Conservation				
PPE				
Respiratory				
Scaffolds/Ladders				
Trenching/Shoring				
Welding, Cutting, and Hot Work				

SPECIALIZED STORAGE SYSTEMS, INC HSE

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 4 OF 4)

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

SPECIALIZED STORAGE SYSTEMS, INC HSE

SAFETY CONTRACT

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

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

Subcontractor shall:

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

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

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

Subcontractor Name

Signature

Title

Date

POLICY

Specialized Storage Systems, Inc has adopted this policy for the prevention of employee exposure to hazards resulting either directly or indirectly from “Hot Work” (welding, cutting, and brazing) in the workplace from the following OSHA regulations:

REFERENCES

- §1910.252 – General Requirements
- §1910.253 – Oxygen-fuel Gas Welding and Cutting
- §1910.254 – Arc Welding and Cutting

RESPONSIBILITIES

David Cali is the supervisor responsible for ensuring the following engineering controls, work practices, and safety procedures are enforced

TRAINING

Specialized Storage Systems, Inc has implemented this policy to ensure that employees are properly trained, aware of hazards associated with hot work, and correctly informed of Company policies, practices, and procedures to prevent, or if possible, eliminate these hazards.

SAFE PRACTICES

David Cali will ensure that welders, cutters, and their supervisors involved in the performance of hot work operations is properly trained in the safe operations of any equipment required, the safe use of the process, proper Personal Protective Equipment (PPE), and safety procedures which will be followed. If welding cannot be conducted safely, the welding and cutting will not be permitted.

Before cutting or welding processes are permitted, the area will be inspected and cleared by David Cali before authorization to proceed is granted. Written “Hot Work” permits will be utilized to ensure appropriate safe work practices are observed.

Cutting or welding will not be permitted in areas not authorized by management, in sprinkled buildings while such protection is impaired, in the presence of explosive atmospheres, or in areas near the storage of large quantities of exposed, readily ignitable materials.

Operators will report any equipment defect or safety hazard to his supervisor and the use of the equipment will be discontinued until its safety has been assured. Repairs will be performed only by qualified personnel.

Where possible, all hot work operations will be performed outside of buildings or structures, clear of any foreseeable fire hazards. If the object to be welded or cut cannot readily be moved, all moveable fire hazards will be removed.

Where hot work must be performed indoors or in the vicinity of fire hazards, the area will be cleared, if possible, of any and all material and equipment which may present a hazard of fire or explosion from flame, sparks, arcs, or slag.

SPECIALIZED STORAGE SYSTEMS, INC HSE

Precautions will be taken so that no readily combustible materials on the floor below will be exposed to sparks which might drop through openings or cracks in the floor. The same precautions will be observed with regard to cracks or holes in walls, open doorways, and open or broken windows.

Where fire hazards exist in the area of hot work operations that cannot be removed, they will be guarded to prevent fire, and the hot work operation will be shielded to confine the heat sparks and slag and to protect the immovable fire hazards and prevent hot materials from falling to a lower level. Fire watchers will have fire extinguishers readily available. A fire watch will be maintained for at least a half hour after the welding or cutting operation is completed to prevent or extinguish any fire resulting from these operations.

The employee(s) assigned to fire watch will be trained in the proper use of fire extinguishers and fire prevention measures, ensure that appropriate fire-fighting equipment and fire extinguishers are readily available, and be responsible for sounding of fire alarms in the event of a fire which is not readily extinguishable. All arc welding operations in occupied areas will be screened to prevent other personnel from being exposed to flash hazards.

Where practicable, all combustibles will be relocated at least 35 feet from the work site. Where relocation is impracticable, combustibles will be protected with flameproof covers or otherwise shielded with metal or asbestos guards or curtains.

Specialized Storage Systems, Inc will be responsible for inspecting work areas prior to any hot work being performed, designate precautions to be followed prior to work commencing, and assign a fire watch where advisable or required when any of the following conditions exist:

- Locations where other than a minor fire might develop
- Appreciable combustible material, in building construction or contents, closer than 35 feet to the point of operation
- Appreciable combustibles are more than 35 feet away, but are easily ignited by sparks
- Wall or floor openings within a 35-foot radius that expose combustible material in adjacent areas including concealed spaces in walls or floors
- Combustible materials are adjacent to the opposite side of metal partitions, walls, ceilings, or roofs and are likely to be ignited by conduction or radiation

If the requirements for fire hazards and guarding as stated above cannot be fully met, Specialized Storage Systems, Inc personnel will not perform the welding and cutting operations until hazardous conditions are fully resolved. Any hot work to be performed in confined spaces will conform to Permit-required Confined Space procedures and the following requirements:

- Adequate ventilation is a prerequisite to work in confined spaces
- When welding or cutting is being performed in any confined spaces the gas cylinders and welding machines will be kept outside of the space. Before operations are started, gas cylinders will be secured, heavy portable equipment mounted on wheels will be securely blocked to prevent accidental movement, and warning signs will be posted
- Where a welder must enter a confined space through a manhole or other small opening, means will be provided for quickly removing him in case of emergency. When safety belts and lifelines are used for this purpose they will be so attached to the welder's body that his body cannot be jammed in a small exit opening. An attendant with a preplanned rescue procedure will be stationed outside to observe the welder at all times and be capable of putting rescue operations into effect

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- When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes will be removed from the holders and the holders stored so that accidental contact cannot occur and the machine disconnected from the power source
- In order to eliminate the possibility of gas escaping through leaks of improperly closed valves when gas welding or cutting, the torch valves will be closed and the fuel-gas and oxygen supply to the torch positively shut off at some point outside the confined area, whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. Where practicable, the torch and hose will also be removed from the confined space

Any welding or brazing materials used in hot work which might possibly generate hazardous fumes, gases, or dust to the metals involved will be suitably labeled to indicate the hazard, and appropriate measures for ventilation or respiratory protection provided to ensure that no employee is exposed to higher than permissible levels of hazardous fumes.

Welding, cutting, or burning of metals containing lead, zinc, cadmium, mercury, beryllium, or other exotic metals, paints, coatings, or preservatives will require that regulation ventilation or respiratory protection be utilized.

After welding or cutting operations are completed, the welder will mark the hot metal or provide some other means of warning other workers.

First aid kits and equipment are readily available at all times for employee use during welding and cutting operations. First aid kits are kept in all company vehicles and are regularly inspected by David Cali to ensure that contents are kept fully stocked and that the appropriate items are available.

Personnel in charge of fuel-gas and oxygen supply equipment (including distribution piping systems and generators) will be fully instructed and determined competent for handling, use, and storage of compressed gas cylinders and related equipment.

The manufacturer's recommendations covering the operation and maintenance of oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems will be followed and readily available to employees.

Cylinders shall be kept away from radiators and other sources of heat. Inside of buildings, cylinders shall be stored in a well-protected, well-ventilated, dry location, at least 20 feet from highly combustible materials. Cylinders should be stored in definitely assigned places away from elevators, stairs, or gangways. Assigned storage spaces shall be located where cylinders will not be knocked over or damaged by passing or falling objects, or subject to tampering by unauthorized persons. Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards. Empty cylinders shall have their valves closed. Valve protection caps, where cylinder is designed to accept a cap, shall always be in place except when cylinders are in use or connected for use.

Only approved apparatus such as torches, regulators or pressure-reducing valves, acetylene generators, and manifolds will be used.

Employees exposed to the hazards created by welding, cutting, or brazing operations shall be protected by personal protective equipment.

Goggles or other suitable eye protection will be used during all gas welding or oxygen cutting operations. Spectacles without side shields, with suitable filter lenses, are permitted for use during gas welding operations on light work, for torch brazing, or for inspection.

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Personnel assigned to operate or maintain arc welding equipment will be properly trained & qualified to operate such equipment and in safety procedures and familiar with OSHA §1910.252(a)(b) & (c) and §1910.254 requirements for arc welding and equipment handling to include the following areas: machine hook up; grounding; electric shock; switches; manufacturers' instructions; electrode holders.

There will be no leaks of cooling water, shielding, gas, or engine fuel.

If gas shielded arc welding operations are being performed, operators will be familiar with the American Welding Society Standard A6-1.

Machines that have become wet will be thoroughly dried and tested before being used.

Cables with damaged insulation or exposed bare conductors will be replaced. Joining lengths of work and electrode cables will be done by the use of connecting means specifically intended for the purpose. The connecting means will have insulation adequate for the service conditions.

Helmets or hand shields will be used during all arc welding or arc cutting operations.

The frame or case of the welding machine, except engine-driven machines, will be grounded.

Before starting operations, all connections to the machine will be checked to make certain they are properly made.

The above policies and procedures will be enforced at Specialized Storage Systems, Inc.

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HOT WORK SAFETY CHECKLIST/PERMIT (PAGE 1 OF 2)

Hazard Assessment must be completed and resolved before commencing welding, cutting, or heating operations. The Authorized Supervisor must sign off on this permit.

Hot Work Location	
Y N	
<input type="checkbox"/> <input type="checkbox"/>	Is appropriate fire-extinguishing equipment ready for use?
<input type="checkbox"/> <input type="checkbox"/>	Is all flammable material moved away from work zone or properly shielded?
<input type="checkbox"/> <input type="checkbox"/>	Are drums, barrels, tanks, or other containers cleansed of flammable, explosive, or toxic residue that could react to heat?
<input type="checkbox"/> <input type="checkbox"/>	Are containers tested prior to and frequently during welding, torching, abrasive cutting, or other hot works to ensure that the containers are free of flammable or toxic vapors?
<input type="checkbox"/> <input type="checkbox"/>	Are shaded goggles or other suitable eye protection used when gas welding or oxygen cutting?
<input type="checkbox"/> <input type="checkbox"/>	Are transparent face shields or goggles used when resistance welding or resistance brazing?
<input type="checkbox"/> <input type="checkbox"/>	Do all welding helpers and equipment attendants use face or eye protection?
<input type="checkbox"/> <input type="checkbox"/>	Are helmets and hand shields worn to protect the face, neck, and ears when arc welding?
<input type="checkbox"/> <input type="checkbox"/>	Do lenses have permanent markings to show the source and shade?
<input type="checkbox"/> <input type="checkbox"/>	Do all employees wear PPE when exposed to the hazards created by welding, cutting, or brazing?
<input type="checkbox"/> <input type="checkbox"/>	Is clothing that is easily ignited or highly flammable, such as that made from synthetic materials, prohibited while welding, cutting, or brazing?
<input type="checkbox"/> <input type="checkbox"/>	Are all electrodes removed from the holders and the machine turned off when arc welding is stopped for lunch or overnight?
<input type="checkbox"/> <input type="checkbox"/>	Are the torch valves closed when gas welding or cutting is stopped for lunch or overnight?
<input type="checkbox"/> <input type="checkbox"/>	Are only approved apparatus such as torches, regulators, or pressure-reducing valves used?

SPECIALIZED STORAGE SYSTEMS, INC HSE

HOT WORK SAFETY CHECKLIST/PERMIT (PAGE 2 OF 2)

<input type="checkbox"/>	<input type="checkbox"/>	Are all compressed-gas cylinders legibly marked to identify the gas content?			
<input type="checkbox"/>	<input type="checkbox"/>	Are all compressed-gas cylinders stored away from radiators and other sources of heat?			
<input type="checkbox"/>	<input type="checkbox"/>	Do all compressed-gas cylinders have valve protection caps in place, hand-tight when not in use?			
<input type="checkbox"/>	<input type="checkbox"/>	Are all compressed-gas cylinders securely lashed in place to prevent them from falling?			
<input type="checkbox"/>	<input type="checkbox"/>	Are oxygen and fuel-gas cylinders stored separately by at least 20 feet or by a noncombustible barrier at least five feet high with a fire-resistance rating of at least one-half hour?			
<input type="checkbox"/>	<input type="checkbox"/>	Are there signs in fuel-gas storage areas that read "DANGER – NO SMOKING, MATCHES OR OPEN LIGHTS" or equivalent wording?			
<input type="checkbox"/>	<input type="checkbox"/>	Are regulators with cracked, broken, or defective parts removed from service?			
<input type="checkbox"/>	<input type="checkbox"/>	Are approved back-flow valves or flash-back valves installed between the blowpipe or torch and the hoses?			
<input type="checkbox"/>	<input type="checkbox"/>	Are arc welder lead cables or electrode lead cables with damaged insulation or exposed conductors removed from service?			
Hot Work Permit Observations					
Assessor Name		Signature	Date		
Supervisor Name		Signature	Date		

DISCLAIMER

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

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

Safety Services Company

P.O. Box 27148 Tempe, Arizona 85285-7148

Toll Free (866) 204-4786

Toll Free FAX (866) 556-0004

Toll Free Customer Service (866) 644-9630

e-mail ssc@safetyservicescompany.com

www.safetyservicescompany.com

EMPLOYEE SIGNOFF

This is to certify that I have received a copy of the Company Health, Safety and Environment Manual.

I have read these instructions, understand them, and will comply with them while working for the Company.

I understand that failure to abide by these rules may result in disciplinary action and possible termination of my employment with Specialized Storage Systems, Inc

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

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

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

Employee Name	Signature	Date
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Supervisor Name	Signature	Date
-----------------	-----------	------

cc: Employee File