Benton Technical Services, Inc. Safety Manual



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ACCIDENT REPORTING AND INVESTIGATION PLAN

Purpose

This Accident Reporting and Investigation Plan prescribes methods and practices for reporting and investigating accidents. No matter how conscientious the safety effort at a company, accidents happen occasionally due to human or system error. Therefore, this written plan is intended to provide a means to deal with all job site accidents in a standardized way and demonstrate our company's compliance with the reporting requirements of 29 CFR 1904. In addition, it is the policy of the company to comply with all workers' compensation laws and regulations.

Administrative Duties

Operation Manager is responsible for developing and maintaining this written Accident Reporting and Investigation Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan.

This written Accident Reporting and Investigation Plan is kept at the main office.

Accident Reporting Procedures

Our accident reporting procedures include the following:

- Employees injured or witnessing an injury on the job are to report the injury to immediate Supervisor as soon as possible after an injury, regardless of how insignificant the injury may appear. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefit procedures. Any delay in the notice to Spectrum Technical Services, Inc. can delay the payment of benefits. A delay of more than 45 days may result in the loss of all benefits. "Near miss" accidents (e.g., when an employee nearly has an accident but is able to avoid an injury or illness) should be reported as well.
- 2. Supervisor will determine the best course of treatment.
- 3. Operations Manager is then to complete the **Illinois Form 45: Employer's First Report of Injury** and send it to Corkill Insurance Agency.
- 4. Any employee witnessing an accident at work is to notify immediate Supervisor so he/she can get the injured employee required first-aid or medical attention.

Accident Investigation Procedures

Thorough accident investigations will help the company determine why accidents occur, where they happen, and any trends that might be developing. Such identification is critical to preventing and controlling hazards and potential accidents. For all accident investigations, Project Manager will perform the following duties:

- 1. Project Manager completes the **Accident Investigation Form** with the employee, any witnesses, and/or other relevant people; and sends a copy of the written Accident Investigation Form to Operations Manager as soon as possible after the accident.
- 2. Any employee witnessing an accident at work is to take part in answering questions related to the **Illinois Form 45** and **Accident Investigation Form**.

Injury, Illness, and Medical Issues

We also follow these procedures:

- 1. Correct procedures if an injury resulting in blood/OPIM occurs:
 - Self-administered first aid & clean up, or
 - Treatment at designated occupational health provider & cleanup by outside contractor.
 - Do not provide 1st aid to another employee
- 2. We believe appropriate treatment at the time of injury is a critical factor in getting an injured employee back to work quickly. We've researched several medical providers near our location and feel like this provider will take great care of our employees if they are injured at work. Benton Technical Services, Inc. recommends that an employee obtain his/her medical care from Designated Occupational Health Provider for any work-related injury. Services are provided by staff highly trained in occupational health. Occupational health services will help the company create a safer, more healthful and more profitable work force and job site.
- 3. Employees with minor injuries/illnesses will be transported to designated occupational health provider by their supervisor.
- 4. Employees with serious injuries/illnesses will be transported by ambulance to nearest hospital.
- 5. Benton Technical Services, Inc. is committed to health and safety at the job site. Our first commitment is to keep injuries from happening. If an injury does occur, Benton Technical Services, Inc. wants to help the worker get better and get back to work as soon as it is medically safe to do so. Employees with job site injuries resulting in time off work shall be put in the company's **Return-to-Work Program** to facilitate their full recovery and resumption of original work.

Recordkeeping

Operations Manager is responsible for maintaining the following records and documentation:

- 1. Job site Notice
- 2. OSHA 301
- 3. OSHA 300 Log
- 4. OSHA 300A
- 5. Accident Investigation form(s)

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Annual Summary Posting

At the end of each calendar year, Operations Manager performs the following steps:

- 1. Review the **OSHA 300 Log** to verify that the entries are complete and accurate, and correct any deficiencies identified;
- 2. Create an annual summary of injuries and illnesses recorded on the OSHA 300 Log;
- 3. Certify the OSHA 300A annual summary; and
- 4. Post the **OSHA 300A** annual summary.

Employee Involvement and Training

This plan is an internal document guiding the action and behaviors of employees, so they need to know about it. Supervisor thoroughly explains to all employees why the Accident Reporting and Investigation Plan was prepared and how employees may be affected by it. Employees are informed in how to report an injury or illness.

Employees, and their representatives, are also provided limited access to our injury and illness records. Copies of relevant **OSHA 300 Logs** are provided by the next business day to all employees, former employees, and representatives that request them. Employees, former employees, and personal representatives who request an **OSHA 301** will also receive them by the end of the next business day. However, authorized employee representatives will only receive requested **OSHA 301** within seven calendar days, and all sections of the **OSHA 301** will be removed except the following:

- Case or File #
- Date & time of the accident
- Did the employee die as a result of the accident?
- If yes, give the date of death
- Nature of the injury
- Part of body affected (be specific)
- What task was the employee performing when the accident occurred?
- Object or substance responsible for accident, if any (source)
- How did the accident occur?

All initial copies are provided to requestors free of charge. Additional copies involve a reasonable charge.

Our company does not discriminate against employees for:

- Reporting a work-related fatality, injury, or illness;
- Filing a safety and health complaint;
- Asking for access to occupational injury and illness records; or
- Exercising any rights afforded by the Occupational Safety and Health Act.

Program Evaluation

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The Accident Reporting and Investigation Plan is evaluated and updated ANNUALLY by Operations Manager to determine whether the plan is being followed and if further training may be necessary.

Appendices

We have attached the following appendices to ensure better understanding of this plan:

Job site Notice OSHA 301 OSHA 300 Log OSHA 300A Accident Investigation form(s)

WORKERS' COMPENSATION



is a system of benefits provided by law to most workers who have job-related injuries or illnesses. Benefits are paid for injuries that are caused, in whole or in part, by an employee's work. This may include the aggravation of a pre-existing condition, injuries brought on by the repetitive use of a part of the body, heart attacks, or any other physical problem caused by work. Benefits are paid regardless of fault.

IF YOU HAVE A WORK-RELATED INJURY OR ILLNESS, TAKE THE FOLLOWING STEPS:

- GET MEDICAL ASSISTANCE. By law, your employer must pay for all necessary medical services required to cure
 or relieve the effects of the injury or illness. Where necessary, the employer must also pay for physical, mental, or
 vocational rehabilitation, within prescribed limits. The employee may choose two physicians, surgeons, or hospitals. If
 the employer notifies you that it has an approved Preferred Provider Program for workers' compensation, the PPP counts
 as one of your two choices of providers.
- NOTIFY YOUR EMPLOYER. You must notify your employer of the accidental injury or illness within 45 days, either orally or in writing. To avoid possible delays, it is recommended the notice also include your name, address, telephone number, Social Security number, and a brief description of the injury or illness.
- 3. LEARN YOUR RIGHTS. Your employer is required by law to report accidents that result in more than three lost work days to the Workers' Compensation Commission. Once the accident is reported, you should receive a handbook that explains the law, benefits, and procedures. If you need a handbook, please call the Commission or go to the Web site.

If you must lose time from work to recover from the injury or illness, you may be entitled to receive weekly payments and necessary medical care until you are able to return to work that is reasonably available to you.

It is against the law for an employer to harass, discharge, refuse to rehire or in any way discriminate against an employee for exercising his or her rights under the Workers' Compensation or Occupational Diseases Acts. If you file a fraudulent claim, you may be penalized under the law.

4. KEEP WITHIN THE TIME LIMITS. Generally, claims must be filed within three years of the injury or disablement from an occupational disease, or within two years of the last workers' compensation payment, whichever is later. Claims for pneumoconiosis, radiological exposure, asbestosis, or similar diseases have special requirements.

Injured workers have the right to reopen their case within 30 months after an award is made if the disability increases, but cases that are resolved by a lump-sum settlement contract approved by the Commission cannot be reopened. Only settlements approved by the Commission are binding.

For more information, go to the Illinois Workers' Compensation Commission's Web site or call any office:

Toll-free: 866/352-3033	Chicago:	312/814-6611	Peoria:	309/671-3019	Springfield:	217/785-7087
Web site: www.iwce.il.gov	Collinsville:	618/346-3450	Rockford:	815/987-7292	TDD (Deaf):	312/814-2959

BY LAW, EMPLOYERS MUST DISPLAY THIS NOTICE IN A PROMINENT PLACE IN EACH WORKPLACE AND COMPLETE THE INFORMATION BELOW.

Party handling workers' compensation claims		
Business address		
Business phone	28 m 20	
Effective date	Termination date	
Policy number	Employer's FEIN	

ICPN 10/11 Printed by the authority of the State of Illinois.

	FLOTER 3 TIRST				Please type or print.
Employer's FEIN	Date o	f report	Case or File #		Is this a lost workday case?
					Yes / No
mployer's name	.		Doing busines	s as	•
Employer's mailing address					
Nature of business or service				SIC code	
Name of workers' compensation ca	rrier/admin	Policy/Cr	ontract #		Self-insured?
tame of fronters compensation da		i olioji oc			Vez (Ne
Employee's full name			Social Security	. #	Yes / No Birthdate
			Social Security	, .	Dirtituate
Employee's mailing address					Employee's e-mail address
1 C T					
		# Depend	dents	Employee's ave	rage weekly wage
Male / Female	Married / Sir	ngle			
Job title or occupation	1990-1990-1997 M 2000			Date hired	
Time employee began work	Date a	ind time of accident		Last day emplo	yee worked
	N N				
f the employee died as a result of t	the accident, give the d	ate of death.	Did the accide	ent occur on the e	mployer's premises?
			Yes	/ No	
Address of accident					
What was the employee doing wher	the accident occurred	2			
How did the accident occur?					
Millert ware the believe on the cost of the		and an id a subabu base	in		
what was the injury of liness? List	the part of body affect	ed and explain now	it was affected.		
What object or substance, if any, d	rectly harmed the empl	oyee?			
Name and address of physician/hea	Ith care professional				
f treatment was given away from t	he worksite. list the nar	ne and address of t	he place it was given.		
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	Company and the sum?	Was the	employee hospitalized	l overnight as an ii	npatient?
Was the employee treated in an em	lergency room?				
Was the employee treated in an em	lergency room?	Y	/es / No	Terta i	

Please send this form to the ILLINOIS WORKERS' COMPENSATION COMMISSION 4500 S. SIXTH ST. FRONTAGE RD. SPRINGFIELD, IL 62703-5118 IC45 6/09 By law, employers must keep accurate records of all work-related injuries and illness (except for certain minor injuries). Employers shall report to the Commission all injuries resulting in the loss of more than three scheduled workdays. Filing this form does not affect liability under the Workers' Compensation Act and is not incriminatory in any sense. This information is confidential.

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Safety Program

OSHA's Form 301 Injuries and Illnesses	Incident Report	Attention employee protects th possible v occupation	This form contains information relating to health and must be used in a manner that he constraintially of employees to the extent while the information is being used for nal safety and health purposes.	U.S. Department of Labor Occupational Safety and Health Administration
	Information about the employee		Information about the case	Form approved OMB no. 1218-0176
This Injury and Illness incident Report is one of the	1) Full Name	10)	Case number from the Log	(Transfer the case number from the Log after you record the case.)
first forms you must fill out when a recordable work-	2) Street	11)	Date of injury or illness	
the Log of Work-Related injuries and linesses and	CityStateZip	12)	Time employee began work	AMPM
employer and OSHA develop a picture of the extent	3) Date of birth	13)	Time of event	AM/PM Check If time cannot be determined
and sevenity of work-related incidents. Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' comensation	4) Date hired 5)Male □ Female	14)	What was the employee doing just be as the tools, equipment or material the er ladder while carrying roofing materials"; " entry."	fore the incident occurred? Describe the activity, as well mployee was using. Be specific. Examples: "climbing a spraying chiorine from hand sprayer"; "daily computer key-
insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form. According to Public Law 01-596 and 29 CFR 1904, OSH44 record/seeping rule, you must keep this form on file for 5 years following the year to which it normation.	Information about the physician or other health care professional 6) Name of physician or other health care professional	15)	What happoned? Tell us how the injury worker fell 20 feel"; "Worker was sprayee "Worker developed screness in wrist ove	eccurred. Examples: "When ladder slipped on wet floor, with chlorine when gasket broke during replacement"; r lime."
If you need additional copies of this form, you may photocopy and use as many as you need.	7) If treatment was given away from the worksite, where was it given? Facility Street City State Zip	16)	What was the injury or illness? Teil us affected; be more specific than "hurt", "pr hand"; "carpel tunnel syndrome."	the part of the body that was affected and how it was ain", or "sore." Examples: "strained back", "chemical burn,
Completed by	Was employee treated in an emergency room? Yes No	17)	What object or substance directly har "radial arm saw." If this question does no	med the employee? Examples: "concrete floor", "chlorine"; I apply to the incident, leave it blank.
PhoneDate	9) Was employee hospitalized overnight as an in-patient? Yes No	18)	if the employee died, when did death d	accur? Date of death

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Public reporting burden for this collection of information is estimated to average 22 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Hereisons are not required to the special to the collection of information unlikes & displays a summer vial QME control number. If you have any comments about his estimate or any other aspects of this data collection, including suggestions for reducing this burden, contact. US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Are, INV Variantigon, CO-2011. Do not start and the contented terms to this disc.

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os Le	OSHA's Form 300 (Rev. 01/2004) Log of Work-Related Injuries and Illnesses						L Occi	Year J.S. De	safety	ment and He	t of La	abor	'n				
You mu beyond injuries injury ar	et record information about every we if first aid. You must also record sign if and illnesses that meet any of the sp and liness insident report (OSHA For which	xk-related injury or it ficant work-related in sectic recording crite n 301) or equivalent	neas that invol juries and illne ria listed in 29 form for each i	ves loss of consciousness, restricted we sees that are diagnosed by a physician CFR 1904.8 through 1904.12. Feel free njury or illness recorded on this form. If	ci activity or job transfer, days away from work, or motical tra- tri licensed health care professional. You must also record w foruse two lines for a single case if you need to. You must or you're not sure whether a case is recordable, call your local for the procession of the second	calmont ork-related omplete an DSHA	i n	Establishm	ent name			Fo	xm app	noved C	ME no.	1218-01	76
01109.10	a iray.							City				State	_				
	Identify the person			Describe the	case	Class	sify the case	•									
(A) Case No.	(B) Employee's Name	(C) Job Title (e.g., Welder)	(D) Date of injury or	(E) Where the event occurred (e.g. Loading dock north end)	(F) Describe injury or illness, parts of body affected, the and objectfourbetance that directly injured or made		K ONLY ONE ost serious out	box for each c come for that c	ase based on ase	Enter the nu days the inj worker was	umber of ured or ill	Checkt	ho "inju	ry" colu ilr	mn or ch 1855:	ioose on	o type of
			onset of illness (mo.iday)		person II (e.g. Second degriee burns on right forearm from acetytene torch)	Death	Days away from work	Remain Job transfer or restriction	ed at work Other record- able cases	Away From Work (days)	On job transfer or restriction (days)	() Sinfu	Skin Disorder	Respiratory Condition	6 marcs in c	Hearing Loss	All other illnesser
						(G)	(H)	(1)	(J)	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)
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All establishments covered by Part 1904 must complete this Summary page, even if no injuries or librases occurred during the year. Remember to review the Log to verify that the entries are complete arie for Usi

tesses occurred during the year. Perrember to review the Log to verify that the entries are complete	
sing the Log, count the individual entries you made for each category. Then write the totals below, aking sure you've added the entries from evary page of the log. If you had no cases write "0."	Establishment information
mplayees/crimer emplayees, and their representatives have the right to review the OGHA Form 200 in antirely. They also have funded access to the COBA Form 30 or as sequivalent. See 35 CFR PA3 2, mCSHAS Also Recondencying ung, the forther delates on the access provisions of theme forms.	Your establishment name
umber of Cases	City State Zip
otal number of eaths Total number of cases with days Total number of with job fransfer or every from work Total number of restriction Total number of other recordable cases Total number of other recordable 0 <th>Industry description (e.g., Manufacture of notor truck trailers) Standard Industrial Classification (SIC), # known (e.g., SIC 3715) OR North American Industrial Classification (NAICS), # known (e.g., 330212)</th>	Industry description (e.g., Manufacture of notor truck trailers) Standard Industrial Classification (SIC), # known (e.g., SIC 3715) OR North American Industrial Classification (NAICS), # known (e.g., 330212)
umber of Days	Employment information
otal number of Total number of days of ays away from job transfer or restriction net 0 0 0.	Annual average rumber of employees Total hours worked by all employees last year
ajury and Illness Types	Sign here
otal number of	Knowingly faisifying this document may result in a fine.
)) Injury 0 (4) Poisoning 0 2) Skin Disorder 0 (5) Hearing Loss 0) Respiratory 0 ondition 0 (6) All Other Illnesses 0	Lourdly that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete .
	Company executive Title
ost this Summary page from February 1 to April 30 of the year following the year covered by the form	Phone Date
discipativity and the includence of information is defined as a second of information or regrance, finding time to invite induction, such and there had an ender incorport and information. In a contraction of the information of the induction of information of applen a comparison of the contraction of the information of the information of the induction of the induction of the information of the contraction of the information of the information of the information of the induction of the induction of the contraction of the information of the information of the information of the induction of the induction of the information of the induction of	

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Accident Investigation Form

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A. Injured Employee Dat	a						
Employee Name	me P				Employee Number		
Location							
Date of accident		Time of Accident A.M. P.M.	Claim Number	r (if known)			
Home Telephone	Wo	ork Telephone	Other/Cell Number				
Manager on Duty	er on Duty MOD Telephone Number						
B. Accident Description							
Instructions: Obtain written and/or recorded statements from injured employee. What happened? What caused the accident? What were the contributing factors? Attach additional sheets if necessary. This document becomes an official accounting of the facts surrounding the accident. When documenting the facts, include answers to the following questions:							
 What was happening at the time of the accident and why was it taking place? 							
3. What were the events leading up to the accident? Describe the sequence in order and when they took place.							
4. What exactly caused th	ie in	njury and how did it h	appen? What w	ere the mechanics, equipme	nt, or tools involved?		

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5. Describe the injury or injuries incurred. What body	part and what kind of inj	jury? (Indicate if no injury	occurred.)		
6. If a physical injury was avoided, what could have happened to cause an injury?					
C. Accident Findings					
After review of all facts, what was the hazardous condi equipment, people, and environment) that contributed t	tion, unsafe work practice o the accident / injury?	e, or other causal factors (p	orocedure,		
D. Corrective Action What is recommended to prevent this type of accident from occurring again?					
Actions taken to ensure recommendations are considered	ed:				
Signature of Accident Investigator	Date	Time] A.M.] P.M.		
E. Distribution Instructions					

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AERIAL LIFT SAFETY PLAN

Purpose

This written Aerial Lift Safety Plan establishes requirements to be followed whenever any of our employees work with an aerial lift at Benton Technical Services, Inc. These requirements are designed to ensure that procedures are in place to safeguard the safety and health of all employees and to ensure that aerial lift safety training, operation, and maintenance practices are communicated to and understood by affected employees. It is our intent to comply with 1926.453 Aerial Lifts.

We encourage all managers and supervisors, permanent and temporary employees, and contractors at this company to read and understand this Aerial Lift Safety Plan, and we welcome any and all comments or suggestions for improving it.

Administrative Duties

While we expect our managers and supervisors, employees, contractors, and others working for our company to be committed to our Aerial Lift Safety Plan.

Affected Lifts

Our Aerial Lift Safety Plan Administrator maintains a list of all aerial lifts used at Benton Technical Service, Inc. that are covered by this plan.

Design and Construction

Aerial lifts covered by this plan are designed and constructed in conformance with the applicable requirements of the American National Standards for "Vehicle Mounted Elevating and Rotating Work Platforms," ANSI A92.2-1969, including appendix.

Selection

Anyone about to purchase, rent, bring, or otherwise obtain an aerial lift for use at our job site must contact Project Manager. Project Manager will perform a tentative hazard evaluation of aerial lifts to choose from.

Then Project Manager will help in selecting an aerial lift that has the proper attributes desired and that meets with the applicable requirements of the American National Standard for "Vehicle Mounted Elevating and Rotating Work Platforms," ANSI A92.2 - 1969, including appendix, which is incorporated by reference as specified in 1910.6. When the aerial lift arrives at the job site, the purchaser/renter/contractor must ensure that it meets the attributes and legal specifications.

Hazard Evaluation

A comprehensive hazard evaluation is conducted by Project Manager. During hazard evaluation, Project Manager will determine hazards associated with use of aerial lifts, including falls from heights, contact with downed lines and live electrical equipment and other utilities (e.g., gas, water), work zone safety and traffic control within a work area, general heavy

equipment operation. These determinations will be recorded for each aerial lift, along with the date. Any necessary corrections will be recorded and dated and performed in adherence to the Modification and Repair and Maintenance sections of this written plan.

Once Project Manager has verified the completion of the hazard evaluation and any related corrections, the aerial lift may be put into service.

Safety and Protective Equipment

Fire Extinguishers

Proper fire extinguishers are kept in the immediate vicinity of each aerial lift. Project Manager is in charge of fire extinguisher selection and maintenance.

Fall Protection and Other Personal Protective Equipment

Any employee working on aerial lift must use personal fall arrest system (PFAS), (e.g. full-body harness and shock absorbing lanyard when operating an aerial lift). Personal fall arrest system shall be attached to the boom or basket.

Project Manager is responsible for selecting and approving fall protection for persons affected by aerial lift operations.

Employees will be required to wear fall protection as specified in the operation manual for each aerial lift. Supervisor has the authority to enforce the use of PFAS.

Project Manager shall ensure that proper PFAS in the appropriate sizes is readily accessible or is issued without cost to employees.

PFAS shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.

Marking

We require that the following signs, labels, and markings be posted conspicuously on or near each aerial lift where those affected will have the best opportunity to see the sign and take precautions:



Project Manager will ensure that signs, labels, and markings are displayed as required, prior to the initial aerial lift operation. This person will also ensure that barricades are in place, as necessary.

Training

It is the policy of Benton Technical Service, Inc. to permit only trained and authorized employees to operate, inspect, maintain, or repair aerial lifts at any time. This policy is applicable, but not limited to, both frequent aerial lift operators and those who only occasionally have cause to use them.

Under no circumstances may an employee operate or perform inspections, maintenance, or repair of an aerial lift until he or she has successfully completed this company's respective training program. This includes all new operators and maintenance personnel, regardless of claimed previous experience.

Supervisor will identify trainees in each set of new hires and make arrangements to schedule the appropriate training. Supervisor will also identify those existing employees who need retraining.

All instructors have a good command of the subject matter and have the instruction and experience necessary to demonstrate competent instructional skills. Their qualifications include extensive knowledge, training and experience.

Operations Manager maintains records of individuals trained for aerial lift-related responsibilities.

Discipline

Constant awareness of and respect for aerial lift safety procedures and compliance with all safety rules are considered conditions of employment. Our company reserves the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the requirements of this Aerial Lift Safety Plan.

Operating Procedures

Aerial lifts can create certain hazards that only safe operation can prevent. That's why we use operating procedures. These procedures are located on each aerial lift. Our general operating procedures are provided below:

- 1. Only trained persons shall be allowed to operate an aerial lift.
- 2. Operators shall be familiar with the manufacturer's operating instructions, safety rules, and safety decals for each lift. The lift shall only be utilized in accordance with the manufacturer's operating instructions.
- 3. Lift controls shall be tested each day prior to use to determine that such controls are in safe working condition. Defects or malfunctions shall be reported to the supervisor immediately.
- 4. Lifts shall only be elevated on a firm level surface. The work area shall be checked for adverse or hazards conditions, e.g. ditches, holes, debris, etc.

- 5. Overhead obstructions and electrical conductors shall be identified and provisions instituted to avoid contact.
- 6. Power Line Safety Procedures

Any overhead power line must be considered energized unless and until the person owning the line or the electric utility authorities tests the line and indicates that it is not energized and have visibly grounded it.

When working in an elevated position near overhead lines, the location shall be such that the person and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following minimum clearance distances.

• For voltages to ground 50kV or below - 10 feet (305 cm);

• For voltages to ground over 50kV - 10 feet (305 cm) plus 4 inches (10 cm) for every 10kV over 50kV. When an unqualified person is working on the ground in the vicinity of overhead lines, the person may not bring any conductive object closer to unguarded, energized overhead lines than 10 feet (For voltages to ground 50kV or below) and 10 feet (305 cm) plus 4 inches (10 cm) for every 10kV over 50kV (For voltages to ground over 50kV).

- 7. The brakes shall be set and outriggers, when used, shall be positioned on pads or a solid surface and be fully extended. Wheel chocks shall be installed before using an aerial lift on an incline.
- 8. The operator shall ensure that safe working load restrictions are followed and that the distribution of loads on the platform conforms to manufacturer's specifications. Rated load restrictions shall not be exceeded.
- 9. Employees shall utilize personal fall arrest system, (e.g. full-body harness and shock absorbing lanyard when operating an aerial lift). Personal fall arrest system shall be attached to the boom or basket.
- 10. Attaching to an adjacent pole, structure, or equipment while working from an aerial lift is not be permitted.
- 11. Employees shall always stand firmly on the floor of the basket and shall not sit or climb on the edge of the basket or sue planks, ladders, or other devices for a work position.
- 12. An aerial lift truck may not be moved when the boom is elevated in a working position with men in the basket, except for equipment which is specifically designed for this type of operation.
- 13. The operator shall ensure that the work platform is free of obstructions, equipment, materials, and personnel prior to lowering the platform.

- 14. Altering, modifying or disabling safety devices or lift components is prohibited.
- 15. Articulating booms and extensible boom platforms, primarily designed as personnel carriers, shall have both platform (upper) and lower controls. Upper controls shall be in or beside the platform within easy reach of the operator. Lower controls shall provide for overriding the upper controls. Controls shall be plainly marked s to their function. Lower level controls shall not be operated unless permission has been obtained from the employee in the lift, except in case of emergency.
- 16. Climbers shall not be worn when performing work from an aerial lift.
- 17. The insulating portion of an aerial lift shall not be altered in any manner that might reduce its insulating value.
- 18. Before moving an aerial lift for travel, the boom shall be inspected to see that it is properly cradled and outriggers are in stowed position.

Fueling Procedures

Our aerial lifts operate with highly flammable and combustible fuels. When filling fuel tanks, we ensure that the aerial lift engine is shut down, the area is well-ventilated, and no ignition sources are present.

Battery Charging Procedures

Aerial lift batteries present a hazard because they contain corrosive chemical solutions, but may also emit highly explosive hydrogen gas during the recharging process. Proper gloves and goggles are used when handling batteries. Moreover, battery charging is performed in a wellventilated area where no ignition sources are present.

Emergency Procedures

Fall Rescue Situations

Benton Technical Services, Inc. will provide for prompt rescue of employees in the event of a fall or shall assure that employees are able to rescue themselves.

Adverse Weather Conditions

Aerial lift work may not be performed when adverse weather conditions, such as thunderstorms, high winds, snow storms, and ice storms, would make the work hazardous even after the work practices required by this plan are employed.

Other Unsafe Conditions

If operators suspect a malfunction of an aerial lift or encounter an unsafe condition or hazard, they must cease operation and report it to their immediate supervisor. The lift may not be operated until the condition is corrected, proper training or instruction is obtained as needed, and the supervisor says it is safe to continue.

Inspection

The company seeks to prevent injuries and fatalities caused by aerial lift failures by establishing an inspection process that identifies and addresses aerial lift safety concerns. The inspections are based on the nature of the critical components of our aerial lifts and the degree of their exposure to wear, deterioration, or malfunction.

Any deficiencies discovered during inspections will be carefully examined by Supervisor, and he or she will determine whether they constitute a safety hazard. If so, these deficiencies will be repaired, or defective parts replaced, before the equipment can be used (see the Maintenance section of this written plan for details).

Initial Inspection

Our company inspects all aerial lifts to ensure they are capable of safe and reliable operation when initially set or placed in service and after any major repairs or adjustments or design modification. Project Manager is responsible for completing these inspections. Either the frequent or annual inspection checklist is used when performing initial inspections.

Pre-Start Inspection

Visual inspection and functional testing of all aerial lifts will be made at the start of each shift to make sure they are in a safe operating condition. This inspection is the responsibility of the operator. A checklist for the pre-start inspection and testing of aerial lifts is attached as an Appendix.

Job site Inspection

An inspection of the work area will be made prior to using an aerial lift to make sure there are no hazards. A checklist for the job site inspection is attached as an Appendix.

Frequent Inspection

Frequent inspections of aerial lifts in regular service are performed by the operator.

A checklist for frequent inspection of aerial lifts is attached as an appendix.

Annual Inspection

The annual inspection performed at least once every 12-13 months promotes safety by ensuring that a thorough, comprehensive inspection of lifts is performed to detect and address deficiencies that might not be detected in a frequent inspection. This inspection must be performed by a qualified outside contractor. This inspection includes items the manufacturer specifies for annual inspection.

Modification and Repair

Any aerial lift deficiencies determined to constitute safety hazards are serviced, adjusted, or repaired, or defective parts are replaced, promptly and before continued use. However, no modifications or alterations that affect the capacity, stability, safe operation, intended use, or mechanical, hydraulic, or electrical integrity of the lift may be made without the manufacturer's

written approval. If such modifications or alterations are made, the capacity, operation, and maintenance instruction plates, tags, or decals must be changed accordingly. In no case may the original safety factor of the equipment or insulating value be reduced.

Benton Technical Services, Inc. uses a qualified and responsible outside contractor for making modifications and repairs according to manufacturer instructions.

Project Manager is responsible for ensuring that aerial lifts are capable of safe and reliable operation after any major repair or design modification. Initial inspection as described earlier in this written plan will be followed for such purposes.

Note: If the lift manufacturer is not in business, a nationally recognized testing lab may approve a modification.

Maintenance

While defective parts may be found, we prefer to invest time and effort into the proper upkeep of our lift equipment, which results in day-to-day reliability. Keeping up with the manufacturer's recommended maintenance schedules, and completing the proper records, will also increase our equipment's longevity and enhance their resale value. Depending on the environment the lifts endure and their severity of use, Project Manager may or may not decide to increase maintenance frequencies.

Project Manager completes any recommended "breaking in" maintenance whenever our company purchases aerial lifts. Operator follows the manufacturer's operator instruction manual for daily maintenance. Periodic maintenance (completed monthly or less frequently) is done by Project Manager in all cases.

Recordkeeping

We maintain these records in the main office.

Plan Evaluation

Although we try to eliminate as many problems as possible and encourage employee safe work practices, problems may occasionally arise in this Aerial Lift Safety Plan. Therefore, Operations Manager is responsible for evaluating and, as necessary, updating this written plan to maintain effectiveness. The evaluation is performed ANNUALLY.

Appendices

We have attached the following documentation to this written plan: *Pre-Use Inspection Checklist*

Pre-Use Inspection Checklist for Aerial Lifts

Instructions: The operator shall inspect aerial lifts prior to placing the machine in service at the beginning of each work shift. Deficiencies noted on the inspection form shall be corrected prior to operation. If the deficiencies cannot be corrected, the aerial lift shall not be used and lock-out/tag-out procedures initiated according to the Aerial Lift Policy.

Aerial Lift Make:		Model:		Serial #:	
Date completed:		_ Inspected By:			
Inspection Item	OK	Repair		Comments	
Operating and emergency controls					
Safety devices					
Structural and other critical components present and all associated fasteners and pins in place					
Personal protective devices (harness, lanyard etc)					
Fluid levels checked (hydraulic oil, engine oil, coolant etc)					
Hydraulic power unit, reservoir, hoses, fittings, cylinders, and manifolds					
Electrical components, wiring harness, and electrical cables					
Loose or missing parts					
Tires and wheels					
Placards, warnings, and control markings					
Owner's manual legible and stored inside container located on platform					
Outriggers, stabilizers and other structures					
Guardrail system					
Cracks in welds or structural components					
Dents or damage to machine					
Other items specified by manufacturer					

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CORPORATE SAFETY POLICIES AND PROCEDURES

In order to establish and organize good safety policies and procedures, this Corporate Safety Policies and Procedures summarizes information regarding safety policies and procedures at this company. Operations Manager is responsible for implementing and updating this plan. The plan is kept in the main office.

General Company Safety Philosophy Statement

Safety is a core value for Benton Technical Services, Inc. and its success depends on the alertness and personal commitment of all. It is the policy of Benton Technical Services, Inc. to provide a safe and healthy working environment for its employees and for visitors to our facilities. The health and safety of each employee and for visitors has always been, and will continue to be, a major concern of all members of management.

Signature (Corporate Officer)

Date

In line with that philosophy, we are committed to comply with the Occupational Safety and Health Act (OSHA), the Environmental Protection Agency (EPA), the Job site of Transportation (DOT), and all other applicable federal, state, and local safety and health regulations. EH&S guidelines are helpful in preventing accidents; however, compliance with these guidelines is not enough to promote a safety culture.

Types of Written Safety Plans in Place

Because we care about our employees and strive to provide a safe work place, we have put into place a number of written safety plans. These written plans provide guidance and direction for the safety issues they cover. The topics covered in written safety plans at this company include the following:

- 1. Accident Reporting & Investigation
- 2. Aerial Lift
- 3. Corporate Safety Policies
- 4. Drug-Free Job site
- 5. Excavation
- 6. Fall Protection
- 7. Hazard Communication
- 8. Ladder Safety
- 9. Motor Vehicle Operation
- 10. Personal Protective Equipment
- 11. Recordkeeping & Reporting
- 12. Return to Work
- 13. Work Zone

Employer/Employee Responsibilities

Management fully supports and provides the necessary resources to implement, maintain, and audit safety programs including financial resources, organizational resources, definition of roles and responsibilities of all employees regarding safety and health, holding employees accountable at all levels of the organization, and the integration of safety when considering business decisions. To assist in providing a safe and healthful work environment for employees and visitors, Benton Technical Services, Inc. has established a job site safety program. Operations Manager will act as Safety Coordinator for all safety programs. Under his/her direction, all employees will be provided with the training, knowledge, and personal protective equipment required to perform their duties in as safe a manner as possible.

Benton Technical Services, Inc. provides information to employees about job site safety and health issues through internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications as well as safety training.

It is the responsibility of *every* employee and visitor to use good judgment and common sense in accident prevention. It is the responsibility of *every* employee to have a working knowledge of the safety rules and personal protective equipment required for the safe performance of their duties. Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe act or condition to Project Manager and/or appropriate Supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment.

Disciplinary Policy

All safety rules, procedures, and plans in effect at this company are intended to be followed. Upon violation of any company safety rule, the violating employee will be penalized. The list of possible disciplinary actions includes:

Violation of safety rules shall result in the following penalties:

First violation:

Employee shall be informed of non-compliance and requested to correct the situation. Employee shall receive verbal warning.

Second violation:

Employee shall be informed of non-compliance and requested to correct the situation. A written warning shall be issued to the employee and a copy maintained in the office.

Third violation:

Employee shall be informed of non-compliance and will immediately be removed from the job site for a 1 day suspension. A written warning shall be issued to the employee and a copy maintained in the office.

Fourth violation:

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Employee shall be informed of non-compliance and be immediately terminated. Written documentation shall be maintained in the office.

Immediate Removal/Termination:

Any employee who commits a serious violation may be subject or termination without prior notice in lieu of any prior verbal and/or written warnings. The following are grounds for immediate termination:

- Any employee exposes themselves or other workers to eminent loss of life.
- Any employee openly exhibits disregard, defiance or disrespect for the safety plan.
- Any employee knowingly falsifies any investigative document or testimony involved in an investigation.
- If physical encounters (fighting) occurs. All individuals involved in the incident are subject to removal.
- Threats made against any personnel in the performance of their duties or any harassing behavior.
- Theft or destruction of property occurs.
- Any employee consumes, possesses, distributes or is under the influence of alcohol/drugs.

Note: All employees who receive corrective action may be required to attend a safe work practice review session, which the company will conduct, on an as-needed basis. This training will be conducted in effort to further employee safety knowledge as well as to raise employee continuing safety awareness.

Appendices

We have attached the following appendices to ensure better understanding of this plan:

Unsafe Acts Resulting in Immediate Suspension or Termination Corrective Action Notice

UNSAFE ACTS RESULTING IN IMMEDIATE SUSPENSION OR TERMINATION

- Any employee exposes themselves or other workers to eminent loss of life.
- Any employee openly exhibits disregard, defiance or disrespect for the safety plan.
- Any employee knowingly falsifies any investigative document or testimony involved in an investigation.
- If physical encounters (fighting) occurs. All individuals involved in the incident are subject to removal.
- Threats made against any personnel in the performance of their duties or any harassing behavior.
- Theft or destruction of property occurs.
- Any employee consumes, possesses, distributes or is under the influence of alcohol/drugs.

CORRECTIVE ACTION NOTICE

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Name	Date					
Type of Corrective Action Taken:						
1. Recorded Verbal Reprimand	Ŧ					
2. Written Reprimand	Ŧ					
3. Supplemental Safety Training Attendance	Ŧ					
4. One Week Suspension	ŧ					
5. Termination	Data					
Safety Violation (Explain Details)	Date					
I have discussed the above cited reprimand with employee effective this date:						
Supervisor	Date					
Employee	Date					
COMMENTS:						

DRUG-FREE JOB SITE PROGRAM

Purpose

Benton Technical Services, Inc. is dedicated to the protection of its employees from situations arising from Drug-Free Job site. To ensure that its workforce is productive, its facility is safe, and the success of its business is not hindered by Drug-Free Job site, Benton Technical Services, Inc. has established a Drug-Free Job site Program. At the same time, the program will promote morale and reduce absenteeism, accident potential, and health and workers' compensation insurance.

Administrative Duties

Operations Manager is responsible for developing and maintaining the written Drug-Free Job site Program. This person is solely responsible for all facets of the program and has full authority to make necessary decisions to ensure the success of this program. The Drug-Free Job site Program is kept at the main location.

Company Policy

This policy is effective January 1, 2014 and will supersede all prior policies and statements relating to alcohol or drugs.

Benton Technical Services, Inc. is committed to providing a safe and healthy job site for all employees, to reducing the costs associated with job site injuries, and to complying with federal and state health and safety regulations. Because our company is concerned about our employees, it is committed to a drug- and alcohol-free job site. Our company Drug-Free Job site policy statement is as follows:

Benton Technical Services, Inc. strictly prohibits the use, possession, sale, or transfer of alcohol or controlled substances by employees at any time on Benton Technical Services, Inc. premises, engaged in company business, while operating company equipment, or while under the authority of the Company except controlled substances prescribed by a treating physician. Employees are prohibited from reporting to work while under the influence of alcohol or controlled substances. Where an employee is taking prescription or non-prescription medication that may affect the employee's ability to safely and efficiently perform his/her job, the employee must promptly advise Benton Technical Services, Inc. so that appropriate options may be considered.

Employees suspected of violating this policy or who are involved in a job site accident will be requested to undergo drug and alcohol testing. An employee is considered "impaired" when (s)he: manifests specific, articulable symptoms while working that decrease or lessen his or her performance of the duties or tasks of the employee's job position, including symptoms of the employee's speech, physical dexterity, agility, coordination, demeanor, irrational or unusual behavior, negligence or carelessness in operating equipment or machinery, disregard for the safety of the employee or others, or involvement in an accident that results in serious damage to equipment or property, disruption of a production or manufacturing process, or carelessness

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that results in any injury to the employee or others.. Every effort will be made to maintain the dignity of employees involved. However, violation of this policy, including any refusal to submit to drug or alcohol testing when requested by Benton Technical Services, Inc., will result in discipline up to and including termination. Infractions may also be reported to law enforcement officials where appropriate.

Benton Technical Services, Inc. will give each employee a copy of our drug-free job site policy statement. (See Appendix A)

If you have a Drug-Free Job site problem, it is your responsibility to seek and complete treatment. We encourage you to contact one of the resources listed here: SAMHSA.org

Participation in substance abuse treatment is confidential, and will not jeopardize employment or advancement, but participation will not protect employees from disciplinary action for continued unacceptable job performance or policy violations.

If you think someone you know (like a co-worker or a family member) has a drug problem, you could tell the person that based on what you've seen, you believe something is happening and it concerns you. Urge that person to get help. If nothing is done, that person could adversely affect the wellbeing of not only himself/herself, but you, your family, and the company.

Drug and Alcohol Testing

We retain the right to test our employees for alcohol and drugs according to the following guidelines:

- Breath alcohol testing will be conducted either on site or at a prearranged location by a qualified Breath Alcohol Technician. Refusal to complete and sign the testing form or refusal to provide breath will be considered a positive test, and the employee will be removed from a safety-sensitive function until resolved.
- Specimen Collection: Specimen collection will be conducted in accordance with applicable state and federal law. The collection procedures will be designed to ensure the security and integrity of the specimen provided by each employee, and those procedures will strictly follow federal chain-of-custody guidelines. Moreover, every reasonable effort will be made to maintain the dignity of each employee submitting a specimen for analysis in accordance with these procedures.
- Laboratory Analysis: Only a laboratory certified by Job site of Health and Human Services (DHHS) to perform urinalysis for the detection of the presence of controlled substances will be retained by Benton Technical Services, Inc. The laboratory will be required to maintain strict compliance with federally approved chain-of-custody procedures, quality control, maintenance and scientific analytical methodologies.

If a test reveals a positive result, then

- The alcohol and drug program administrator will be responsible for designating the appropriate Drug-Free Job site professional who, in conjunction with the employee's physician, will diagnose the problem and recommend treatment.
- The employee's successful completion of the approved treatment program is a condition of continued employment.
- Following successful completion of any approved treatment program, the employee will be required to submit to at least six random drug tests during the first year, and follow-up testing may be conducted for up to 60 months. Failure to adhere to this condition is grounds for immediate termination.

All supervisors will receive training to assist them in identifying alcohol and drug use behavioral characteristics.

See the Drug and Alcohol Testing section later in this written program for more details.

Supervisor Training

Supervisors are the key to the success of our policy. As the people in direct contact with employees, supervisors can detect performance problems that may indicate Drug-Free Job site.

Supervisors must take action if they have reason to believe one or more of the signs of possible alcohol or drug use is indicated, and that the Drug-Free Job site is affecting an employee's job performance or behavior in any manner. A supervisor observing such conditions will take the following actions immediately:

- Confront the employee involved, and keep under direct observation until the situation is resolved.
- Secure the alcohol and drug program administrator's concurrence to observations; job performance and company policy violations must be specific.
- After discussing the circumstances with the supervisor, the alcohol and drug program administrator will arrange to observe or talk with the employee. If he/she believes, after observing or talking to the employee, that the conduct or performance problem could be due to Drug-Free Job site, the employee will be immediately informed that continued refusal will result in disqualification from performing any safety sensitive function.
- Employees will be asked to release any evidence relating to the observation for further testing. Failure to comply may subject the employee to subsequent discipline or suspension from duties. All confiscated evidence will be receipted for with signatures or both the receiving supervisor, as well as the provider.
- If upon confrontation by the supervisor, the employee admits to use but requests assistance, the alcohol and drug program administrator will arrange for assessment by an appropriate Drug-Free Job site professional. Reassignment to the employee's position is conditional to completing the Professional's guidelines and return-to-work testing.

• The supervisor shall, within 24 hours or before the results of the controlled substance test are released, document the particular facts related to the behavior or performance problems, and present such documentation to the alcohol and drug program administrator.

Our supervisors are trained to observe employees' job performance noting the following items (not all-inclusive):

- Abnormally dilated or constricted pupils
- Glazed stare redness of eyes
- Flushed ace
- Change of speech (i.e. faster or slower)
- Constant sniffing
- Increased absences
- Redness under nose
- Sudden weight loss
- Needle marks
- Change in personality (i.e. paranoia)
- Increased appetite for sweets
- Forgetfulness performance faltering poor concentration
- Borrowing money from coworkers or seeking an advance of pay or other unusual display of need for money
- Constant fatigue or hyperactivity
- Smell of alcohol
- Slurred speech
- Difficulty walking
- Excessive, unexplained absences
- Dulled mental processes
- Slowed reaction rate

Other training topics we cover with our supervisors include the following:

- Overview of Drug-Free Job site Policy
- Supervisors' responsibilities
- Identifying performance problems and handling potential crisis situations
- Recognizing problems
- Intervention and referral
- Protecting confidentiality
- Continued supervision
- Enabling and supervisor traps
- Dos and Don'ts for supervisors

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Employee Education and Awareness

Our employees must understand and remain aware of our ongoing commitment to a drugfree job site. All new and current employees must successfully complete **Benton** Technical Services, Inc.'s Drug- and Alcohol-Free Job site Training.

Through training, Benton Technical Services, Inc. ensures that employees are knowledgeable in the following:

- Identify safety and productivity hazards created by the abuse of alcohol and other drugs at our job site.
- List the benefits of drug-free job site programs to protecting employees' health and safety.
- List five components of a comprehensive drug-free job site approach.
- Explain Benton Technical Services, Inc.'s Alcohol- and Drug-Free Job site Policy.

Drug and Alcohol Testing

Our drug and alcohol testing program is also part of our Drug-Free Job site Program. We have set up a drug testing program for the following reasons:

Suspicion-based Testing

- Reasonable suspicion: If an employee is having work performance problems or displaying behavior that may be alcohol or drug-related, or is otherwise demonstrating conduct that may be in violation of the Policy where immediate management action is necessary, a supervisor, with the concurrence of the alcohol and drug program administrator, will require that an employee submit to a breath test or urinalysis. An employee is considered "impaired" when (s)he: manifests specific, articulable symptoms while working that decrease or lessen his or her performance of the duties or tasks of the employee's job position, including symptoms of the employee's speech, physical dexterity, agility, coordination, demeanor, irrational or unusual behavior, negligence or carelessness in operating equipment or machinery, disregard for the safety of the employee or others, or involvement in an accident that results in serious damage to equipment or property, disruption of a production or manufacturing process, or carelessness that results in any injury to the employee or others.
- The drug and alcohol program administrator will remove or cause the removal of the any employee driving a Company-owned vehicle and ensure that the driver is transported to an appropriate collection site an thereafter to the employee's residence. Under no circumstances will that employee be allowed to continue to drive a Company vehicle or his/her own vehicle until a confirmed negative test result is received.

Post-Accident Testing

• All employees are required to submit to a breath alcohol test and a urine specimen to be tested for the use of controlled substances "as soon as practicable" after an accident. The employee shall remain readily available for such testing or may be deemed by the

alcohol and drug program administrator to have refused to submit to testing. No alcohol may be consumed for 8 hours after the accident or until a test is conducted. If the employee is seriously injured and cannot provide a specimen at the time of the accident, he/she shall provide the necessary authorization for obtaining hospital reports and other documents that would indicate whether there were any controlled substances in his/her system.

Employee Sanction

Benton Technical Services, Inc. will ensure that any employee, who is convicted of violating any criminal drug statute, will have sanctions imposed or will be required to satisfactorily participate in a drug abuse assistance or rehabilitation program.

Appendix

Our company has attached the following appendices to this written program:

Alcohol- and Drug-Free Job site Policy

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Alcohol- and Drug-Free Job site Policy

This policy is effective January 1, 2013, and will supersede all prior policies and statements relating to alcohol or drugs.

Benton Technical Services, Inc. is committed to providing a safe and healthy job site for all employees, to reducing the costs associated with job site injuries, and to complying with federal and state health and safety regulations. Because our company is concerned about our employees, it is committed to a drug- and alcohol-free job site. Our company Drug-Free Job site policy statement is as follows:

Benton Technical Services, Inc. strictly prohibits the use, possession, sale, or transfer of alcohol or controlled substances by employees at any time on Benton Technical Services, Inc. premises, engaged in company business, while operating company equipment, or while under the authority of the Company except controlled substances prescribed by a treating physician. Employees are prohibited from reporting to work while under the influence of alcohol or controlled substances. Where an employee is taking prescription or non-prescription medication that may affect the employee's ability to safely and efficiently perform his/her job, the employee must promptly advise Benton Technical Services, Inc. so that appropriate options may be considered.

Employees suspected of violating this policy or who are involved in a job site accident will be requested to undergo drug and alcohol testing. An employee is considered "impaired" when (s)he: manifests specific, articulable symptoms while working that decrease or lessen his or her performance of the duties or tasks of the employee's job position, including symptoms of the employee's speech, physical dexterity, agility, coordination, demeanor, irrational or unusual behavior, negligence or carelessness in operating equipment or machinery, disregard for the safety of the employee or others, or involvement in an accident that results in serious damage to equipment or property, disruption of a production or manufacturing process, or carelessness that results in any injury to the employee or others. Every effort will be made to maintain the dignity of employees involved. However, violation of this policy, including any refusal to submit to drug or alcohol testing when requested by Benton Technical Services, Inc., will result in discipline up to and including termination. Infractions may also be reported to law enforcement officials where appropriate.

Employee Signature

Date
EXCAVATION PROCEDURES

We have written Excavation Procedures to comply with 1926 Subpart P for Excavations for both our daily and occasional excavation workers. It is the policy at Benton Technical Services, Inc. to permit only trained and authorized personnel to create or work in excavations.

Administrative Duties

Project Manager is responsible for developing and maintaining the written Excavation Procedures. Our Excavation Procedures are administered under the direction of our competent person(s), someone capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

General Requirements for Excavations

The following rules are to be followed at all times by all employees working on, in, or near excavations, as applicable:

- Competent Person: An individual must be designated who is capable of identifying existing or predictable hazards in the vicinity of the work, or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.
- 2. Training: All workers shall be trained in the hazards associated with each excavation and the control measures taken to required, i.e. personal protective equipment, cave-ins, etc.
- 3. Surface Encumbrances: i.e. rocks, trees, telephone poles, fire hydrants, etc. must be removed or structurally supported prior to employees entering excavation.
- 4. Underground Installations: Before starting work, do the following:
 - a. Determine the approximate location of utility installations—sewer, telephone, fuel, electric, and water lines; or any other underground installations;
 - b. Contact J.U.L.I.E. at 8-1-1 to inform them of the proposed work within established or customary local response times; and ask the utility companies or owners to find the exact location of underground installations.
 - C. State law requires that the excavator exercise due care at all times to protect underground utility lines and CATS lines. If, after waiting the required 48 hours, the excavator observes clear evidence that there is an unmarked utility or CATS line in the area of the proposed excavation, the excavator should not begin excavating until two (2) hours after an additional call is made to the Statewide One-Call Notice System for the area.
 - d. The Company has an obligation to honor all time/marking requirements and then to dig in a reasonable and prudent manner, taking all reasonable and required precautions to avoid damaging underground lines. Benton Technical Services, Inc. follows current

industry practices, such as hand digging and/or vacuum excavation within 18 inches on either side of a marked underground line.

- e. An emergency locate request call is processed immediately by the JULIE system. According to state law, excavators must wait at least two hours (or until the date and time requested on the notice, whichever is longer) before digging. If an earlier start time is needed, the Company must demonstrate that site conditions warrant the earlier start time. If a member(s) does not respond within the required wait time, call the member company directly and/or JULIE again. JULIE will send another request to the member(s) not responding.
- f. While the excavation is open, underground installations are protected, supported or removed as necessary to safeguard employees.
- 6. Exposure to Vehicular Traffic: Employees must be provided with and must wear warning vests or highly visible garments when exposed to traffic. Stop/slow signs shall be used to signal or re-route traffic.
- 7. Exposure to falling loads: No employee shall be permitted underneath loads handled by lifting or digging equipment. Employees shall be required to stand away from any vehicle being loaded or unloaded to avoid being struck by any spillage or falling materials. Operators may remain in the cabs of vehicles being loaded or unloaded when the vehicles are equipped to provide adequate protection for the operator during loading and unloading operations.
- 8. Warning System for Mobile Equipment: All mobile equipment shall require a backup alarm or similar system to notify employees of vehicular movement. Prevention of vehicles from falling into trenches will be accomplished by providing: barricades, hand or mechanical signals, or stop logs. If possible, grading will be away from the excavation.
- 9. Hazardous Atmospheres: Workers shall be protected from exposure to harmful levels of airborne/atmospheric contaminants. To assure hazardous atmospheres are not present the following guidelines requirements will be followed:
 - a. Test the air, before employees enter a trench, if there is a possibility that a hazardous atmosphere exists or could be reasonably expected to exist access shall be denied until favorable atmospheric conditions resume. Tests shall be made prior to entry and throughout the time period that workers are inside the excavation.
 - b. Oxygen deficient with less than 19.5% oxygen, or oxygen rich with more than 23% oxygen. Normal breathable air contains 21% oxygen. Adequate precautions shall be taken to prevent employee exposure to atmospheres containing less than 19.5 percent oxygen and other hazardous atmospheres. These precautions include providing proper respiratory protection or ventilation in accordance with subparts D and E of 1926.

Oxygen enriched atmospheres can increase flammability of combustible materials.

- c. Tests shall be made for the possible accumulation of carbon Monoxide, CO. Carbon monoxide causes oxygen starvation and can be fatal at a concentration of 1% or one minute = 10,000 ppm.
- d. Trenches shall be ventilated if flammable gas is detected in excess of ten (10%) of the lower flammable limit, LEL. Ventilation shall be used to vent of any accumulated hazardous atmospheric conditions.
- e. Workers wearing respirators shall be required to be trained in the use, maintenance, and proper fit-testing procedures. Respirator must be suitable for the exposure encountered.
- f. Emergency rescue equipment must be available when a hazardous atmosphere exists or could reasonably be expected to exist. Harness and lifeline is required when a worker enters bell-bottom pier holes and other deep confined spaces. Lifelines shall be attended at all times.
- 10. Protection for hazards associated with water accumulation Water Accumulation must be controlled to prevent cave-ins.
 - a. Employees are not permitted to work in trenches where water accumulation exists, unless:
 - i. Special support systems or shield systems are used to protect employees from cave-ins,
 - ii. Water removal equipment is used and monitored by a competent person to prevent water accumulation, and
 - iii. Safety harnesses and lifelines are used to protect employees.
 - iv. Precautions necessary to protect employees in each situation.
 - b. Surface water must be diverted and controlled.
 - c. Trenches must be inspected after each rainstorm
- 11. Stability of Adjacent Structures:
 - a. Support systems such as shoring, bracing, or underpinning must be used to support structures that may be unstable due to excavation operations.
 - b. Excavating below the base or footing of a foundation or wall is not permitted unless the following conditions are met: Support system is provided to ensure the stability of the structure; or the excavation is in stable rock; or the operation is approved by a Registered Professional Engineer.
 - c. Support systems must be provided for sidewalks, pavements, and other structures that may have their structural integrity compromised by the excavation operations.
- 12. Protection of Employees from Loose Rock or Soil:
 - a. Employees must be protected from being struck by materials falling or rolling from the edge and face of the trench.

- b. Spoils and equipment must be set back at least 2 feet from the edge of the trench and/or a retaining device must be installed.
- 13. Inspections: To be completed by a competent person (See attached Inspection Form):
 - a. Daily prior to starting work and as needed throughout the shift.
 - b. After every rainstorm.
 - c. After other hazard increasing occurrence, i.e. inclement weather.
 - d. Inspect the trench for indications of a possible cave-in, i.e. fissures, tension cracks, undercutting, water seepage, bulging at the bottom, adjacent areas (spoil piles, structures, etc.).
 - e. Protective systems and their components (uprights, whalers, sheeting, shields, hydraulics) before and during entry into excavation.
 - f. Check for indications of a hazardous or potentially hazardous atmosphere. Test the atmosphere if a hazard could reasonably be expected to exist.
 - g. Remove employees from the trench when there are indications of possible cavein, protective system failure, or other potentially hazardous conditions

Protective Support Systems

Benton Technical Services, Inc. works in excavations less than 5 feet deep where there is no indication of possible cave-in, as determined by a competent person. However, will protect each employee in an excavation 5 feet or more from cave-ins by an adequate protective system including proper sloping or benching of the sides of the excavation; supporting the sides of the excavation with timber shoring or aluminum hydraulic shoring; or placing a shield between the side of the excavation and the work area.

Training

Our training covers the following:

- Cave-ins and other excavation hazards (surface encumbrances, underground installations, access and egress, vehicular traffic, falling loads, mobile equipment, hazardous atmospheres, water accumulation, adjacent structures, loose rock or soil, walkways).
- Requirements for protective systems
 - Sloping and benching
 - Support systems, shield systems, and other protective systems.
- Soil classification.
- Safe work practices.
- PPE.
- The role of a competent person at an excavation site.
- Inspections.

Inspection Procedures

Our competent person inspects excavations daily and during poor weather. Our inspection checklist is attached to these written Excavation Procedures.

Personal Protective Equipment

Benton Technical Services, Inc. has conducted a hazard assessment of the job site to determine what hazards are present that require the use of protective equipment and determined the following PPE should be used to protect our workers:

- 1. Hard Hats shall be worn at all times. Hard hats shall be worn by all personnel when working on the ground, climbing ladders, hoisting materials overhead, roofing operations or similar operations that present an overhead hazard.
- 2. Eye protection shall be worn at all times when eye hazards are encountered.
- 3. Appropriate work clothing shall be worn at all times; long pants, shirts with a minimum of a three-inch sleeve, gloves, and durable work boots shall be worn when warranted to protect against exposure to physical and chemical hazards.
- 4. Durable work boots shall be worn at all times. Tennis shoes shall be prohibited.
- 5. Hearing protection shall be worn when to prevent exposure to or injury from potentially damaging noise levels when work with pneumatic tools for short durations.
- 6. Approved respirators, if necessary, to protect employees from oxygen-deficient atmosphere or other hazardous atmosphere.
- 7. Rubber insulating gloves that meet the requirements of NFPA 70(e) rated for the maximum voltage in work areas where the exact location of underground electric power lines is unknown.

All excavation workers required to wear this equipment are trained when it is necessary; what equipment is necessary; how to properly put on, take off, adjust, and wear it; limitations of the equipment; and proper care, maintenance, useful life, and disposal of PPE.

Appendix

We have attached the following documents to these written Excavation Procedures:

Excavation Inspection Checklist

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Excavation Inspection Checklist

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Company					Dat	ite		
Project Name					Ар	Approx. Temp.		
Project Location					Ар	oprox. Wind Dir.		
Job Number				Saf	fety Rep			
Excavation Depth & Width				Soi	il Classification			
Protective System Used					" 			
Activit	ies In Ex	cavatio	n					
Compo	etent Pe	rson						
YES	NO	N/A	DESCRIPTI	ON	<u></u>			
	•	<u> </u>	•	(GENERAL			
			Trenches c	over 4 fee	et deep require	e proper access, e.g	. ladder or ramp	
			Distance from access/egress shall not exceed 25 of lateral travel					
Trenches over 5 fee					et deep require sloping/shoring or a trench box			
			Employees protected from cave-ins & loose rock/soil that could roll into the excavation					
			Spoils, mat	erials &	equipment set back at least 2 feet from the edge			

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			of the excavation.				
			Engineering designs for sheeting &/or manufacturer's data on trench box capabilities on site				
			Adequate signs posted and barricades provided				
			Training (toolbox meeting) conducted w/ employees prior to entering excavation				
		<u></u>	UTILITIES				
			Utility company contacted & given 24 hours notice &/or utilities already located & marked				
			Overhead lines located, noted and reviewed with the operator				
			Utility locations reviewed with the operator, & precautions taken to ensure contact does not occur				
			Utilities crossing the excavation supported, and protected from falling materials				
			Underground installations protected, supported or removed when excavation is open				
	WET CONDITIONS						
			Precautions taken to protect employees from water accumulation (continuous dewatering)				
			Surface water or runoff diverted /controlled to prevent accumulation in the excavation				
YES	NO	N/A	DESCRIPTION				

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	In oc	Inspection made after every rainstorm or other hazard increasing occurrence						
	HAZARDOUS ATMOSPHERES							
	Ai	r in the excavation her contaminants	test	ed for oxygen defi	ciency, combustibles,			
	Ventilation used in atmospheres that are oxygen rich/deficient &/or contains hazardous substances							
	Ve	entilation provided	to k	eep LEL below 10	%			
	Er	Emergency equipment available where hazardous atmospheres could or do exist						
	Sa	Safety harness and lifeline used						
	Su	ipplied air necessar	y (if	yes, contact safet	y job site)			
.		ENT	RY 8	EXIT				
	Ex	tit (i.e. ladder, slope	ed w	all or ramp)				
	La	dders secured and	exte	end 3 feet above tl	he edge of the trench			
	Wood ramps constructed of uniform material thickness, cleated together at the bottom							
	Employees protected from cave-ins when entering or exiting the excavation							
VISUAL TEST	_							
Particle type		Fine Grained (Cohesive)		Granular (sand/silt or	Other:			

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					gra	vel)		
Wate	r Conc	litions	We	t Dry	Seeping Water	Surface Water present	Submerged	
Note	5							
Yes	No	N/A	Descrip	tion				
			Layered	l Soils Dip	oping Into exca	vation? If yes,	describe:	
			Excavat	ion expo	sed to vibratio	ns? If yes, des	cribe:	
			Previou	sly distur	bed soils?			
			Crack li	ke openir	ngs or sprawlin	g observed?		
			Underg	round ut	ilities? If yes, w	/hat type:		
			Layered	soils? (N	s? (Note: the least stable layer controls the soil type)			
MAN	UAL TI	EST	1					
Plasti	city		Cohesiv	ve Non- cohesi	Dry (b ve Strength w, di	ohesive roken / fficulty)	ular	
Wet Shake			Water comes to surface (granular material)			Surface rema	ains dry (clay material	
	SOIL CLASSIFICATION							
	Stable	e Rock	Т	ype A	Туре В		Туре С	
	SELECTION OF PROTECTIVE SYSTEM (Refer to Appendix F of 29CFR1926)							

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THUMB TEST Note: Used to estimate unconfined compression strength of cohesive soil.						
Test Performed	Yes	No	N/A, Explain:			
Soil indented by thumb with very grea	Туре А					
Soil indent by thumb with some effort	?			Туре В		

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Sloping (Appendix B)	Timber	Trench Shield	Hydraulic Shoring
Specify angle:	Shoring (Appendix C)	Max depth in this soil:	(Appendix D)

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Soil easily penetrated several inches by t				
no effort. NOTE: If soil is submerged, see	ater,	Туре С		
subjected to surface water, runoff, expo	sed	to w	vetting.	
PENETROMETER or SHEARVANE TEST N	ote:	Use	ed to estimate	unconfined compressive strength
of cohesive soils.				
		-		
Test Performed	Yes	No	Device Used /	Serial Number:
Soil with unconfined compressive streng	th o	f 1.5	5 tsf of	
greater				Туре А
Soil with unconfined compressive streng	th o	fgre	eater than 0.5	
tsf and less than 1.5 tsf.				Туре в
Soil with unconfined compressive streng				
Note: if the soil is submerged, seeping w	ater	, su	bjected to	Туре С
surface water, runoff, exposed to wettin	g.			
	0			

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FALL PROTECTION PLAN

OSHA currently regulates fall protection for construction under Part 1926, Subpart M. The standards for regulating fall protection systems and procedures are intended to prevent employees from falling off, onto or through working levels and to protect employees from falling objects. Fall protection requirements under the OSHA Construction regulations require considerable planning and preparation.

Written fall protection procedures establish guidelines to be followed whenever an employee works above dangerous equipment on ramps or runways or at heights with fall protection at the job site. The regulations:

- Are designed to provide a safe working environment, and
- Govern use of fall protection procedures and equipment.

Written procedures for fall protection establish uniform requirements for fall protection training, operation, and practices. The effectiveness of the written fall protection procedures depends on the active support and involvement of all employees who perform the jobs requiring it. This plan is intended to document procedures that ensure all work requiring fall protection is carried out safely.

Definitions:

- Fall Protection Equipment (FPE) any equipment, device or system that prevents an accidental fall from elevations or that mitigates the effect of such fall.
- Wood Pole Fall Restriction Device A device that, when properly adjusted and combined with other subcomponents and elements, allows the climber to remain at his or her work position with both hands free and that performs a fall restriction function if the climber loses contact between his or her gaffs and the pole.
- Work Positioning Equipment (WPE) Equipment used to support a worker on the pole so that the worker's hands are free when he or she reaches the work position. A pole strap, a lineman's body belt, and/or a lineman's harness and hooks/gaffs constitute Work Positioning Equipment.

Purpose

Benton Technical Services, Inc. is dedicated to the protection of its employees from on-thejob injuries. All employees of Benton Technical Services, Inc. have the responsibility to work safely on the job. The purpose of this plan is to:

- Supplement our standard safety policy by providing safety standards specifically designed to cover fall protection on this job.
- Ensure that each employee is trained and made aware of the safety provisions which are to be implemented by this plan prior to the start of erection.

This program informs interested persons, including employees that Benton Technical Services, Inc. is complying with OSHA's Fall Protection requirements, (29 CFR 1926.500 to.503).

This program applies to all employees who might be exposed to fall hazards, except when designated employees are inspecting, investigating, or assessing job site conditions before the actual start of construction work or after all construction work has been completed.

All fall protection systems selected for each application will be installed before an employee is allowed to go to work in an area that necessitates the protection. Operations Manager is the program coordinator/manager and is responsible for its implementation. Copies of the written program may be obtained in the main office.

Our Duty to Provide Fall Protection

To prevent falls Benton Technical Services, Inc. has a duty to anticipate the need to work at heights and to plan our work activities accordingly. Careful planning and preparation lay the necessary groundwork for an accident-free jobsite.

Worksite Assessment and Fall Protection System Selection

There are situations at this worksite that will require fall protection.

This fall protection plan is intended to anticipate the particular fall hazards to which our employees may be exposed. Specifically, we:

- Inspect the area to determine what hazards exist or may arise during the work.
- Identify the hazards and select the appropriate measures and equipment.
- Give specific and appropriate instructions to workers to prevent exposure to unsafe conditions.
- Ensure employees follow procedures given and understand training provided.
- Apprise ourselves of the steps our specialty subcontractors have taken to meet their fall protection requirements.

Providing fall protection requires an assessment of each fall situation at a given jobsite. Our criteria for selecting a given fall protection system follow those established at 29 CFR 1926.502, fall protection systems criteria and practices. Each employee exposed to these situations must be trained as outlined later in this plan.

Fall Protection and Other Personal Protective Equipment

- Any employee working on aerial lift must use personal fall arrest system (PFAS), (e.g. full-body harness and shock absorbing lanyard when operating an aerial lift).
- Personal fall arrest system shall be attached to the boom or basket.
- Employees will be required to wear fall protection as specified in the operation manual for each aerial lift.

- Supervisor has the authority to enforce the use of PFAS.
- PFAS shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.

Using Klein Pole and Tree Climbers

- Prior to climbing any wood pole, an inspection of the pole shall be conducted. All components of the fall protection equipment are inspected by the climber (per manufacturers' specifications) to ensure the device is fit for use
- Work-positioning equipment must be rigged so that workers can free fall no more than 0.6 meters (2 feet)
- All employees exposed to falls of 6 feet or more to lower levels must use a personal fall arrest system
- Supervisor has the authority to enforce the use of PFAS.
- PFAS shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.

Ladders

- Well maintained and not defective, such as having missing or broken parts;
- Kept at least 10 feet away from power lines and other electric equipment. For lines and equipment over 50 kV, the distance should be 10 feet plus 4 inches for every 10 kV over 50 kV.⁺
- Inspected before each use, and remove damaged or defective ladders;
- Secured to avoid slippage; and
- Used according to the manufacturer's instructions

General Worksite Policy

1. If any one of the conditions described at our job site Assessment is not met for the area or piece of equipment posing a potential fall hazard, then do not perform that work until the condition is met. If you cannot remedy the condition immediately, notify a supervisor of the problem and utilize a different piece of equipment or work in a different area, according to the situation.

2. If the situation calls for use of fall protection devices such as harnesses or lanyards because the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.

3. Only employees trained in such work are expected to perform it.

4. Only use climbing equipment approved by the manufacturer, including climbing lines, safety lines, personal fall protection equipment, and inspect all equipment for safe operation before starting work; remove damaged, defective, or worn equipment from service.

Training Program

Under no circumstances shall employees work in areas where they might be exposed to fall hazards, do work requiring fall protection devices, or use fall protection devices until they have successfully completed this company's fall protection training program.

The training program covers the following areas:

- The nature of fall hazards in the work area.
- Selection and use of personal fall arrest systems, including application limits, proper anchoring and tie-off techniques, estimation of free fall distance (including determination of deceleration distance and total fall distance to prevent striking a lower level), methods of use, and inspection and storage of the system.
- The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used.
- The use and operation of personal fall arrest systems to be used.
- The role of employees in fall protection plans.
- The standards contained in Subpart M of the construction regulations.

Benton Technologies, Inc. obtains comprehensive training from the manufacturer as to the proper use of equipment which includes "train the trainer". Training is only be conducted by qualified trainers.

Workers who climb trees are trained and competent in:

- The selection and safe use of the equipment/system Application limits; techniques used for proper adjusting of the equipment, methods of use, inspection, storage of the device and a demonstration of competency of device usage;
- Climbing techniques;
- Using climbing spurs with gaffs that are compatible with the tree they will climb;
- Using a second means of fall protection such as a PFAS;
- Lifting and lowering hand tools and equipment; and
- Carrying only hand tools and equipment that are necessary for climbing

Job site instruction will include demonstration of and practice in wearing fall protection equipment and any instruction necessary for a specific job.

Refresher training shall be provided that will maintain employee's competency in the use of required equipment.

Enforcement

Constant awareness of and respect for fall hazards, and compliance with all safety rules are considered conditions of employment. Benton Technical Services, Inc. reserves the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

Incident Investigation

All accidents that result in injury to workers, regardless of their nature, are investigated and reported. It is an integral part of any safety program that documentation take place as soon as possible so that the cause and means of prevention can be identified to prevent a reoccurrence.

In the event that an employee falls or there is some other related, serious incident (e.g., a near miss) occurs, this plan will be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of falls or incidents from occurring.

Changes to Plan

Any changes to the plan will be approved by the Project Manager. This plan is reviewed by a qualified person as the job progresses to determine if additional practices, procedures or training needs to be implemented by the competent person to improve or provide additional fall protection. Workers are notified and trained, if necessary, in the new procedures. A copy of this plan and all approved changes is maintained at the jobsite.

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HAZARD COMMUNICATION PROGRAM

The purpose of this program is to inform interested persons, including employees, that Benton Technical Services, Inc. is complying with 1926.59 Hazard Communication, by compiling a hazardous chemicals list, by using safety data sheets (SDS's), by ensuring that containers are labeled, and by providing our employees with training and information availability.

This program applies to all work operations in our company where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation.

Operations Manager is the program coordinator and has overall responsibility for the program. He/she will review and update the program, as necessary. Copies of the written program may be obtained in the main office.

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS's, and chemical information lists from Operations Manager. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. Our employees will also be informed of the hazards associated with nonroutine tasks, such as nonroutine task(s).

If after reading this program, you find that improvements can be made, please contact Operations Manager. We encourage all suggestions because we are committed to the success of our written hazard communication program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Hazard Evaluation Procedures

Our chemical inventory is a list of hazardous chemicals known to be present in our job site. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations. The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of others requires an actual inventory of the facility.

Operations Manager updates the inventory as necessary.

Operations Manager keeps the chemical inventory list, along with related work practices used at our job site where it is accessible during work hours.

After the chemical inventory is compiled, it serves as a list of every chemical for which a SDS must be maintained.

Safety data sheets (SDS's)

The SDS's we use are fact sheets for chemicals which pose a physical or health hazard at our job site. The SDS's are the primary tool for getting detailed chemical information.

SDS's contain the following sections:

Section 1: Identification; Section 2: Hazard(s) identification; Section 3: Composition/information on ingredients; Section 4: First-aid measures; Section 5: Fire-fighting measures; Section 6: Accidental release measures; Section 7: Handling and storage; Section 8: Exposure controls/personal protection; Section 9: Physical and chemical properties; Section 10: Stability and reactivity; Section 11: Toxicological information; Section 12: Ecological information; Section 13: Disposal consideration; Section 14: Transport information; Section 15: Regulatory information; and Section 16: Other information, including date of preparation or last revision.

Operations Manager is responsible for obtaining/maintaining the SDS's at our facility. He/she will contact the chemical manufacturer or vendor if additional research is necessary. All new procurements for the company must be cleared by Operations Manager.

The safety data sheets are kept at our job sites where employees can obtain access to them.

Labels and Other Forms of Warning

Labels are not intended to be the sole source of information for chemicals which pose a physical or health hazard at our job site. Labels serve only as immediate warnings.

Each container of hazardous chemicals at our job site is labeled. Labels list at least the product identifier; signal word; hazard statement; pictogram; precautionary statement; and name, address, and telephone number of the manufacturer, importer, or other responsible party.

The product identifier is found on the chemical inventory, the SDS, and the label. Therefore, the chemical identity links these three sources of information. The product identifier used by the supplier may be a common or trade name, or a chemical name.

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The signal word indicates severity of hazard and alerts the reader to a potential hazard on the label.

"Danger" is used for the more severe hazards. "Warning" is used for less severe hazards.

The hazard statement is assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

Each pictogram (see attached) consists of a symbol plus other graphic elements to convey specific info about health/physical hazards of a chemical to the reader. Each pictogram consists of a different symbol on a white background within a red diamond.

The precautionary statement is a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling of a hazardous chemical.

Operations Manager is responsible for ensuring that all hazardous chemicals are properly labeled and updated, as necessary. Operations Manager also ensures that newly purchased materials are checked for labels prior to use.

Operations Manager will refer to the corresponding SDS to assist employees in verifying label information.

Training

Everyone who works with or is potentially "exposed" to hazardous chemicals will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous chemicals. "Exposure" means that "an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure." Whenever a new hazard is introduced or an old hazard changes, additional training is provided.

Information and training is a critical part of the hazard communication program. We train our employees to read and understand the information on SDS's and labels, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves. Our goal is to ensure employee comprehension and understanding including being aware that they are exposed to hazardous chemicals, knowing how to read and use SDS's and labels, and appropriately following the protective measures we have established. We ask our employees to ask questions. As part of the assessment of the training program, Operations Manager asks for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

All employees receive training for hazard communication.

Training Content

The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, access to SDS information and what it means, and the labeling system used.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies).

Hazards of Nonroutine Tasks

When employees are required to perform any of the following hazardous nonroutine tasks that have the potential to expose workers to hazardous chemicals, we inform employees of these hazards.

Additional Information

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS's, and chemical information lists at the main location.

Appendix

We have attached to this plan the lists, samples, or procedures that ensure better understanding of our written program.

Sample Label Standard Pictograms

	SAMPLE LABEL
CODE Product Product Name Product	t Hazard Pictograms
Company Name Street Address CityState Postal CodeCountry Emergency Phone Number	or cation
Keep container tightly closed. Store in a cool, well-ventilated place that is locked.	Signal Word Danger
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.	Highly flammable liquid and vapor. May cause liver and kidney damage.
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.	Precautionary Statements Supplemental Information
In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish.	Directions for Use
First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.	Fill weightLot Number: Gross weight:Fill Date: Expiration Date:

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Health Hazard	Flame	Exclamation Mark
 Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Aspiration Toxicity 	 Flammables Pyrophorics Self-Heating Emits Flammable Gas Self-Reactives Organic Peroxides 	 Irritant (skin and eye) Skin Sensitizer Acute Toxicity (harmful) Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder	Corrosion	Exploding Bomb
• Gases Under Pressure	 Skin Corrosion/ Burns Eye Damage Corrosive to Metals 	• Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle	Environment (Non-Mandatory)	Skull and Crossbones
• Oxidizers	Aquatic Toxicity	Acute Toxicity (fatal or toxic)

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LADDER SAFETY

Purpose

This written Ladder Safety Plan describes methods and practices for care and use of ladders that can be read and understood by all managers, supervisors, and employees at Benton Technical Services, Inc. This written plan is intended to be used to:

- create an awareness of the hazards among our workforce,
- standardize procedures for use and care of the equipment,
- provide a consistent format for training employees on the proper procedures to be used,
- minimize the possibility of injury or harm to our employees, and
- demonstrate Benton Technical Services, Inc.'s compliance with stairway and ladder requirements in 29 CFR 1926 Subpart X.

The procedures establish guidelines to be followed whenever an employee works with ladders at our company.

Administrative Duties

Operations Manager is responsible for developing and maintaining this written Ladder Safety Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan.

This written Ladder Safety Plan is kept in the main office.

If, after reading this plan, you find that improvements can be made, please contact Operations Manager. We encourage all suggestions because we are committed to creating a safe job site for all our employees and a safe and effective ladder safety program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

Ladders

- 1. Must be capable of supporting 4 times maximum intended load
- 2. Ladder rungs, cleats, and steps must be parallel, level, and uniformly spaced.
- 3. Rungs, cleats and steps of portable ladders must be spaced 10-14" apart.
- 4. Clearance distance between sides of individual-rung/stepladders minimum 16".
- 5. Clearance distance between side rails for all portable ladders 11 ½".
- 6. Rungs must be shaped so employee's feet cannot slide off.
- 7. Rungs on portable ladder must be corrugated, knurled, dimpled, coated with skidresistant material or otherwise treated to minimize slipping.
- 8. Employees are prohibited from fastening ladders together, unless they are specifically designed for such use.
- 9. Stepladders must be provided with spreader or locking device.
- 10. Ladders must be free of projections which may cause injury or snag clothing.
- 11. Wood ladders must not be coated with any opaque coating.

Work Practices

- 1. Side rails must extend at least 3 feet above upper landing surface.
- 2. Ladders must be free of oil, grease, and other slipping hazards.
- 3. Ladders must not be loaded beyond the maximum intended load or the manufacturer's rated capacity.
- 4. Ladders must be used only for the purpose for which they were designed.
- 5. Extension ladders should be set at 4:1 angle.
- 6. Ladders should only be used on stable surfaces unless secured to prevent accidental displacement.
- 7. Ladders must not be used on slippery surfaces unless secured or provided with slipresistant feet.
- 8. Ladders in any location where they can be displaced by job site activities or traffic must be secured to prevent accidental displacement or a barricade must be used to keep activities or traffic away from the ladder.
- 9. Area around top and bottom of ladder must be kept clear.
- 10. Ladders must not be moved, shifted, or extended while occupied.
- 11. Ladders with nonconductive siderails must be used if the employee or ladder could contact exposed energized electrical equipment.
- 12. Crossbracing on stepladders must not be used for climbing.
- 13. Ladders must be inspected by a competent person.
- 14. Portable ladders with structural defects must be marked "Do Not Use" and taken out of service.
- 15. Ladder repairs must restore ladder to original design criteria before returning to use.
- 16. Single-rail ladders must not be used.
- 17. Employees must use 3-point contact when ascending or descending ladders.
- 18. Employees must not carry objects that could cause them to lose balance and fall.

On two-section extension ladders, the minimum overlap for the two sections in use will be according to OSHA specifications.

Normal length of ladder:	Overlap (feet):
Up to and including 36	3
Over 36, up to and including 48	4
Over 48, up to 60	5

Inspections and Maintenance

Ladders will be inspected quarterly by Project Manager to insure safety and serviceability.

Portable ladders can be damaged during use, handling, moving, and storage, which can render the ladder unsafe for use. It is important that portable ladders be inspected before each use.

Ladders will be maintained in good usable condition at all times.

The joint between the steps and side rails is kept tight, all hardware and fittings are securely attached, and the movable parts operate freely without binding or undue play.

Metal bearings of locks, wheels, pulleys, etc., will be frequently lubricated.

Frayed or badly worn rope will be replaced.

Safety feet and other auxiliary equipment will be kept in good condition to insure proper performance.

Ladders which have developed defects will be withdrawn from service for repair or destruction and tagged or marked as *Dangerous, Do Not Use*.

If ladders tip over, Supervisor will:

- inspect the ladder for side rails dents or bends, or excessively dented rungs;
- check all rung-to-side-rail connections;
- check hardware connections; and
- check rivets for shear.

If ladders are exposed to oil and grease, equipment will be cleaned and kept free of oil, grease, or slippery materials.

See Appendix A for Portable Ladder Inspection Checklist.

Recordkeeping

Project Manager is responsible for maintaining records of ladder inspections.

These records are kept in the main office.

Training

For all employees who work on ladders and stairways, training is provided annually.

Supervisor is responsible for providing the training.

Elements included in the training program include the safe work practices and other requirements of this written plan.

Disciplinary Procedures

Constant awareness of and respect for stairway and ladder safety procedures and compliance with all safety rules are considered conditions of employment. The Company reserves the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this stairway and ladder safety program.

Program Evaluation

Although we may not be able to eliminate all problems, we try to eliminate as many as possible to improve employee protection and encourage employee safe practices. Therefore,

Operations Manager is responsible for evaluating and updating this written plan. The evaluation will include a review of reported accidents, as well as near misses, to identify areas where additional safety measures need to be taken.

Operations Manager will also conduct a periodic review to determine the effectiveness of the program.

This review may include:

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- a walk-through of the job site, and
- interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced.

Appendices

We have attached the following appendices to ensure better understanding of this written plan:

Portable Ladder Inspection Checklist

Portable Ladder Inspection Checklist

Date of Inspection:	Name of Inspec	Name of Inspector:				
Ladder Identification:						
Type of Ladder: () Extension () Step						
Construction of Ladder () Wood () Metal () Fiberglass						
		Deal				
General	Serviceable	Defective*	Not Applicable			
Loose steps or rungs (can be moved by hand)						
Loose Nails, screws, bolts, or other materials						
Cracked, split, or broken uprights, braces, steps. or rungs						
Slivers on uprights, rungs, or steps						
Rungs, cleats, and steps are uniformly spaced at 12" (+/-2")						
Rungs/steps missing						
Rungs/steps on metal ladders corrugated or knurled						
Free from grease, oil, or slippery materials						
Wooden parts free from splinters, cracks, decay						
Wooden ladders cannot have opaque coatings						
Joints between rungs and side rails tight (cannot be moved by hand)						
Movable parts operate freely						
Damaged or worn non-slip bases						
Rails free from cracks/splitting						
Loose nails/screws						
Stepladders						
Wobbly (from loose or worn parts when in the open position)						
Do not exceed 20 feet in length						
Loose or bent hinge spreaders						
Broken stop on hinge spreaders						
Sharp edges on spreaders						
Loose hinges						
Extension Ladders						
Loose, broken, or missing extension locks						
Defective locks that do not seat properly when ladder is extended						
Frayed or worn rope						
Single section ladders do not exceed 30 feet in length						
Two-section extension ladders do not exceed 48 feet in length						
(metal ladders) or 60 feet in length (wood ladders)						
Ladders with more than two sections do not exceed 60 feet in						
length						
Comments						

*Defective ladders should be removed from service.

MOTOR VEHICLE OPERATION PROGRAM

Purpose

This written Motor Vehicle Operation Program establishes guidelines to ensure that we hire capable operators, only allow eligible operators to drive a "covered motor vehicle," train and supervise operators, and maintain vehicles properly. A "covered motor vehicle" is a motor vehicle that is owned, leased, or rented by the company or is a driver-owned vehicle operated during work time.

Adherence to this written program can improve traffic safety performance, minimize the risk of motor vehicle incidents, and help to keep our employees safe and our costs as low as possible. Copies of the written program may be obtained from Operations Manager.

Policy

This policy is communicated to employees and others working for our company who are authorized to operate motor vehicles through Benton Technical Service, Inc.

The purpose of this policy is to ensure the safety of those individuals who drive company vehicles, the motoring public, and pedestrians. Vehicle accidents are costly to our company, but more importantly, they may result in injury to you or others. It is the driver's responsibility to operate the vehicle in a safe manner and to drive defensively to prevent injuries and property damage. As such, Benton Technical Services, Inc. endorses all applicable state motor vehicle regulations relating to driver responsibility. Benton Technical Services, Inc. expects each driver to drive in a safe and courteous manner pursuant to the following safety rules.

Management Leadership

Benton Technical Services, Inc. is our Motor Vehicle Operation Program Administrator. The Program Administrator coordinates the Motor Vehicle Operation Program elements for our company. This person is responsible for setting up and managing the program so that managers, supervisors, and employees know what our company expects. Operations Manager has the authority to carry out duties in a timely manner so that progress is made in meeting program goals. Operations Manager is also provided with financial and organizational resources and information sufficient to meet those responsibilities.

Operations Manager has examined our existing policies and practices to ensure that they encourage and do not discourage reporting and participation in our program. In this way, early reporting of motor vehicle incidents and hazards and meaningful employee participation in the program are more likely to occur. All company incentive programs are designed to reward safe motor vehicle operation (such as active participation in the program, the identification of motor vehicle hazards at our job site, and the reporting of motor vehicle incidents early), rather than to reward employees for having fewer or lower rates of motor vehicle incidents.

Operations Manager communicates with employees about the Motor Vehicle Operation Program and their concerns about motor vehicle hazards and incidents so employees have the information necessary to protect themselves and have effective input into the program's operation.

Employee Involvement

Our employees and their representatives are expected to understand our motor vehicle incident reporting system, so that reports of incidents and hazards are received in a timely and systematized manner. Operations Manager responds promptly to all reports.

Legal Requirements

We are committed to comply with U. S. Job site of Transportation (USDOT), Federal Motor Carriers Safety Regulations (FMCSR), Illinois Job site of Transportation (IDOT), Illinois Vehicle Code (625 ILCS 5), and all other applicable federal, state, and local motor vehicle safety regulations.

Company Rules

Benton Technical Services, Inc. has motor vehicle operation rules that are specific to our company.

- The use of a company vehicle while under the influence of intoxicants and other drugs is forbidden and is sufficient cause for discipline, including dismissal.
- No driver shall operate a company vehicle when his/her ability to do so safely has been impaired by illness, fatigue, injury, or prescription medication.
- All drivers and passengers operating or riding in company vehicles must wear seat belts, even if air bags are available.
- No unauthorized personnel (e.g. hitch-hikers) are allowed to ride in company vehicles.
- Head lights must be used at night (dusk until dawn), during inclement weather, in construction zones, and in tunnels.
- Do not tailgate.
- If you see or hear an aggressive driver near you move out of his/her way. If a hostile motorist tries to pick a vehicle fight do not make eye contact, do not respond in kind, ignore any gestures, and most of all stay calm.
- Report aggressive driving to the police. Provide a vehicle description, license number, location and the direction of travel.
- Drivers of passenger vehicles should keep a two-second interval between their vehicle and the vehicle immediately ahead. During slippery road conditions, the following distance should be increased to at least four-seconds.
- Drivers of heavy trucks should keep a minimum of a three-second interval when not carrying cargo; and at least four-seconds when fully loaded. Following distance should also be increased when adverse conditions exist.
- Drivers must yield the right of way at all traffic control signals and signs requiring them to do so. Drivers should also be prepared to yield for safety's sake at any time. Pedestrians and bicycles in the roadway always have the right of way.

- Avoid driving in other driver's blind spots; attempt to maintain eye contact with the other driver, either directly or through mirrors.
- Drivers must honor posted speed limits. In adverse driving conditions, reduce speed to a safe operating speed that is consistent with the conditions of the road, weather, lighting, and volume of traffic.
- Turn signals must be used to show where you are heading; while going into traffic and before every turn or lane change.
- When passing or changing lanes, view the entire vehicle in your rear view mirror before pulling back into that lane.
- Be alert of other vehicles, pedestrians, and bicyclists when approaching intersections. Never speed through an intersection on a caution light. Approach a stale green light with your foot poised over the brake to reduce your reaction time should it be necessary to stop. When the traffic light turns green, look both ways for oncoming traffic before proceeding.
- When waiting to make left turns, keep your wheels facing straight ahead. If rear-ended, you will not be pushed into the lane of oncoming traffic.
- When stopping behind another vehicle, leave enough space so you can see the rear wheels of the car in front. This allows room to go around the vehicle if necessary, and may prevent you from being pushed into the car in front of you if you are rear-ended.
- Avoid backing where possible, but when necessary, keep the distance traveled to a minimum and be particularly careful.
- Check behind your vehicle. Operators of heavy trucks should walk around their vehicle before backing and/or have someone guide you.
- Back to the driver's side. Do not back around a corner or into an area of no visibility.

Distracted Driving Policy

In order to increase employee safety and eliminate unnecessary risks behind the wheel, Benton Technical Services, Inc. has enacted a Distracted Driving Policy. We are committed to ending the epidemic of distracted driving, and have created the following rules, which apply to any employee operating a company vehicle or using a company-issued cell phone while operating a personal vehicle:

- Company employees may not use a hand-held cell phone while operating a vehicle whether the vehicle is in motion or stopped at a traffic light. This includes, but is not limited to, answering or making phone calls, engaging in phone conversations, and reading or responding to emails, instant messages, and text messages.
- If company employees need to use their phones, they must pull over safely to the side of the road or another safe location.
- Additionally, company employees are required to:
 - > Turn cell phones off or put them on silent or vibrate before starting the car.
 - Consider modifying voice mail greetings to indicate that you are unavailable to answer calls or return messages while driving.
 - Inform clients, associates and business partners of this policy as an explanation of why calls may not be returned immediately.

Operator Issues

The safe driving skills of our drivers are important for our company's efficient and profitable operations. The desire and ability to control accident-producing situations are the important factors in driving safely.

Selection

Our job application requests information about licensing and education to help our recruiter select a candidate qualified to operate a motor vehicle. Completed job applications of those we hire are kept in our personnel files.

In order to screen out operators who have poor driving records, Benton Technical Services, Inc. checks the motor vehicle records of all applicants and employees assigned company vehicles or who operate their personal vehicles for company business. The results of these checks are also kept in the person's personnel file.

Qualifications must be met when selecting an applicant or current employee to operate a motor vehicle (see Driver Eligibility attached).

Training

Our company communicates traffic safety policies, procedures, and expectations regarding operator performance, vehicle maintenance, and reporting of moving violations with all employees who drive for work purposes whether they operate assigned company vehicles or operate their personal vehicles.

Through training we ensure that motor vehicle drivers are knowledgeable in:

- Company Rules,
- Distracted Driver Policy,
- Inspection,
- Breakdown & Road Repair,
- Security,
- Incident Reporting & Investigation, and
- Driver Eligibility.

After an employee has completed the training program, the instructor will determine whether the employee can safely operate a motor vehicle. If job performance shows that the employee is lacking the appropriate skills and knowledge, the employee is retrained by our instructor(s).

Benton Technical Services, Inc. also reviews motor vehicle records periodically to ensure that drivers maintain a good driving record. The results of each check are kept in the driver's personnel file.

All employees have a general obligation to work safely.

Vehicle Issues

Selecting, properly maintaining, and routinely inspecting company vehicles is an important part of preventing motor vehicle incidents and related losses.

Maintenance

Proper vehicle maintenance is a basic element of any fleet safety program, not only to ensure a safe, road worthy vehicle, but also to avoid costly repair expenses and unexpected breakdowns. Operations Manager ensures that vehicles meet or exceed the manufacturer's specified routine preventive maintenance schedule for servicing and checking of safety-related equipment. Where no manufacturer recommendation is made or where legal or best practices provide more stringent maintenance frequencies, we follow the appropriate legal requirement or best practice.

Additionally, Operations Manager ensures that vehicles are serviced immediately after we are notified of a recall.

Scheduled maintenance and repairs are performed by a qualified service shop.

Personal vehicles used for company business are not necessarily subject to the same criteria and are generally the responsibility of the owner. However, personal vehicles used on company business should be maintained in a manner that provides the employee with maximum safety and reflects positively on the company.

Inspection

DOT regulated drivers perform a thorough pre-/post-trip inspection of each vehicle at least daily. However, non-DOT regulated drivers must also perform a visual inspection of any vehicle before operating it.

- Registration and Inspection is the responsibility of the assigned driver.
- Drivers of D.O.T. regulated vehicles are required to inspect their vehicle prior to usage, documenting and notifying the company mechanic of deficiencies found.
- In addition to inspections required by law for passenger vehicles, routine inspections of critical items, such as brakes, lights, tires, wipers, etc., must also be completed by drivers of passenger vehicles.
- The vehicle should be cleaned (interior & exterior) regularly to help maintain its good appearance for you and the Company. A clean vehicle makes a good impression on customers.

Any deficiencies discovered during inspections will be carefully examined by Supervisor, and this person will determine whether they constitute a safety hazard. If deficiencies would affect the safety of operation of the vehicle or result in its mechanical breakdown, these deficiencies will be repaired, or defective parts replaced, before the vehicle can be used. Supervisor certifies on the original driver vehicle inspection report which lists any defect or deficiency that

the defect or deficiency has been repaired or that repair is unnecessary before the vehicle is operated again.

Breakdown and Road Repair

Our vehicle breakdown procedures have been developed to ensure the safety of our drivers and the motoring public, securement of the vehicle and its cargo, timely customer notification of any shipment delay, and facilitation of expedient vehicle repair. All Benton Technical Services, Inc. vehicle drivers are expected to follow these procedures in the event of a breakdown:

• Any motor vehicle discovered to be in an unsafe condition while being operated on the highway may be continued in operation only to the nearest place where repairs can safely be performed. Such operation shall be conducted only if it is less hazardous to the public than to permit the vehicle to remain on the highway.

Security

We are committed to ensuring the physical safety of our motor vehicle drivers and to reduce or prevent vehicle and cargo theft and damage opportunities.

Drivers are responsible for the security of company vehicles assigned to them. The vehicle engine must be shut off, ignition keys removed, and vehicle doors locked whenever the vehicle is left unattended. If the vehicle is left with a parking attendant, only the ignition key is to be left.

Incident Reporting and Investigation

A motor vehicle incident is a negative occurrence that involves a "covered" motor vehicle and that caused or could have caused injury, illness, or property damage.

In an attempt to minimize the results of an accident, the driver must prevent further damages or injuries and obtain all pertinent information and report it accurately. Motor vehicle incident reporting procedures are kept in each vehicle. Here are our incident reporting procedures:

- Stop! When involved in a crash, no matter how minor, do not leave the scene until speaking to the other driver, police, or both.
- Stay calm. Avoid inclination to react in anger, particularly when the other driver is acting irrationally.
- Keep safety first. If no serious injuries, move vehicles out of traffic. If vehicles cannot be moved, turn on hazards and, if safe to do so, place cones, flares, or warning triangles. Then, stay in vehicles with seat belts fastened until help arrives. Call for medical assistance. Always err on the side of caution and call for help if anyone is bleeding, feels lightheaded, or is suffering any physical injury.
- Contact the police. Police officers will address traffic violations and take notes for the crash report.

- Be polite, but do not admit fault or apologize. Do not discuss specific details of the accident with anyone except the police.
- Contact your employer.
- Take pictures damage to all vehicles; road conditions; intersection site; traffic signs or lights. Do not take pictures of injured persons!
- Document the accident when; where; weather conditions; what happened; how it happened; others involved (include insurance information); injuries; witnesses; diagram.

The above incident reporting procedures will be enforced. Failure to meet incident reporting procedures will lead to disciplinary.

All motor vehicle incidents will be investigated to determine their causes and whether or not the incidents were preventable. Understanding the root causes of incidents and why they are happening, regardless of fault, forms the basis for eliminating them in the future.

A correctable or preventable incident is sufficient cause for discipline, including dismissal.

Program Evaluation

It is inherent that problems may occasionally arise in this Motor Vehicle Operation Program. By thoroughly evaluating and, as necessary, promptly taking action to correct any deficiencies in our program, we can eliminate problems effectively. The occurrence of a motor vehicle incident does not in itself mean that the program is ineffective.

At Benton Technical Services, Inc., our program evaluation, performed annually by Operations Manager.

Appendices

We have attached the following documents to this written Motor Vehicle Operation Program:

Driver Eligibility Vehicle Inspection Report Accident Report /

Driver Eligibility

Company vehicles are to be driven by authorized employees only, except in emergencies, or in case of repair testing by a mechanic. Spouses and other family members are <u>not</u> authorized to drive the Company vehicle.

- Any employee who has a driver's license revoked or suspended shall immediately notify Supervisor and <u>discontinue operation of the company vehicle</u>. Failure to do so may result in disciplinary action, including dismissal.
- All accidents, regardless of severity, must be reported to the police and to Supervisor. Failing to stop after an accident and/or failure to report an accident may result in disciplinary action, including dismissal.
- Drivers must immediately report all summonses received for moving violations during the operation of a company vehicle to Supervisor.
- Motor Vehicle Records will be ordered periodically to assess employees' driving records. An operator will lose his/her privilege to operate a vehicle for work or operate a company-owned, -leased, or -rented vehicle for personal use if the following criteria are met:
 - ALL <u>TYPE 'A' VIOLATIONS</u> (as defined below) WILL RESULT IN TERMINATION OF DRIVING PRIVILEGES FOR EMPLOYEES AND WILL DISQUALIFY ANY POTENTIAL DRIVER EMPLOYEES.
 - ANY DRIVERS (EMPLOYEES OR APPLICANTS) SHOWING ONE OF THE FOLLOWING WILL BE RESTRICTED FROM DRIVING COMPANY VEHICLES:
 - One (1) or more type 'A' Violations in the last 3 years
 - Three (3) or more accidents (regardless of fault) in the last 3 years.
 - Three (3) or more type 'B' violations in the last 3 years
 - Any combination of accidents and type 'B' violations which equal Four (4) or more in the last 3 years.

Type 'A' Violations:

- Driving While Under the Influence (DUI), or refusing a blood alcohol or drug test
- Negligent Homicide Arising out of the use of a Motor Vehicle (gross negligence)
- Operating During a period of Suspension or Revocation
- Using a Motor Vehicle for the commission of a Felony
- Aggravated Assault with a Motor Vehicle
- Operating a Motor Vehicle Without the Owners Authority (grand theft)
- Permitting an Unlicensed Person to Drive
- Reckless Driving
- Speed Contest (racing)
- Hit and Run (Bodily Injury or Property Damage)
- Fleeing or eluding a police officer

Type 'B' Violations

• All Moving Violations not listed as type 'A' Violations

Vehicle Inspection Checklist

it:				Date:	
	Inspection Criteria	Yes	No	Safety issue	Comments
1.	Parking brake				
2.	Steering mechanism				
3.	Lighting devices and reflectors				
4.	Tires				
5.	Horn				
6.	Windshield wipers				
7.	Rear vision mirrors				
8.	Coupling devices				
9.	Wheels and rims				
10.	Emergency equipment				

Deficiency which would affect the safety of operation of the vehicle or result in its mechanical breakdown :

Driver signature

Date

Deficiency corrected by:

Authorized signature

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Safety Program

VEHICLE ACCIDENT KIT DESCRIPTION OF ACCIDENT AND OTHER COMMENTS: What happened? In the event of an accident, follow these steps: 1. Stop! When involved in a crash, no matter how minor, do not leave the scene until speaking to the other driver, police, or both. 2. Stay calm. Avoid inclination to react in anger, particularly when the other driver is acting irrationally. 3. Keep safety first. If no serious injuries, move vehicles out of traffic. If vehicles cannot be How did it happen? moved, turn on hazards and, if safe to do so, place cones, flares, or warning triangles. Then, stay in vehicles with seat belts fastened until help arrives. 4. Call for medical assistance. Always err on the side of caution and call for help if anyone is bleeding, feels lightheaded, or is suffering any physical injury. 5. Contact the police. Police officers will address traffic violations and take notes for the crash report. 6. Be polite, but do not admit fault or apologize. Do not discuss specific details of the accident with anyone except the police. Other pertinent information: 7. Contact your employer. 8. Take pictures - damage to all vehicles; road conditions; intersection site; traffic signs or lights. Do not take pictures of injured persons! 9. Document the accident - when; where; weather conditions; what happened; how it happened; others involved (include insurance information); injuries; witnesses; diagram.

	Driver's Name	Date of Incident	Day of Week	Time of Incident (AM or PM)
ent ils				
cide eta	Address of Accident	Description of Location		Weather Conditions
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	Name	Phone	Address		
esses	Name	Phone	Address		
Witn	Name	Phone	Address		
	Name	Phone	Address		

CORKILL INSURANCE

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Safety Program

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VEHICLE ACCIDENT KIT

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sa	Were policies and procedures followed?	Describe policies and proce	edures in effect relating to this inc	ident.			
Caus	List all causes of the incident. (i.e. equipmer	nt, procedure, environment, beha	vior)				
s Taken	Has corrective action been initiated? Yes No	What corrective action is being	taken and/or when will corrective	e action be	taken?		
Action	Work order submitted?	What safety equipment or train	ing could have prevented this inci	dent?			
ment	Bodily Injury Yes No	Facility Name:		Name of	f physician (or other healthca	are professional)	
al Treat	Worker's Comp Claim Filed Yes No	Facility Address:		Was employee treated in an emergency room?			
Medic				Was em	ployee hospitalized overnigh	t as an in-patient?	
ures	Signature of Driver				Phone	Date	
Signat	Signature of Manager				Phone	Date	
Attachments	Police Report	Site Diagram	Medical Report	🗌 wi	itness Statement	Add'l Comments	
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PERSONAL PROTECTIVE EQUIPMENT (PPE) PROGRAM

While OSHA's Personal Protective Equipment regulation, found at 29 CFR 1910.132-.140(Subpart I), does not explicitly require a written Personal Protective Equipment (PPE) Program, Benton Technical Services, Inc. has developed a written PPE program to document and specify all information relative to our PPE needs.

Operations Manager is the program coordinator and has overall responsibility for the program. This written plan is kept in the main office. Operations Manager will review and update the program as necessary.

We at Benton Technical Services, Inc. believe it is our obligation to provide a hazard free environment to our employees. Each employee encountering hazardous conditions must be protected against the potential hazards. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards that cannot reasonably be abated otherwise. The purpose of protective clothing and equipment (PPE) is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present at our job site.

Establishing an overall written PPE program detailing how employees use PPE makes it easier to ensure that they use PPE properly at our job site and document our PPE efforts in the event of an OSHA inspection. Benton Technical Services, Inc.'s PPE program covers:

- Purpose
- Hazard assessment
- PPE selection
- Employee training
- Cleaning and maintenance of PPE
- PPE specific information

If after reading this program, you find that improvements can be made, please contact Operations Manager. We encourage all suggestions because we are committed to the success of our Personal Protective Equipment Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Purpose of Program

Our PPE program was established to ensure adequate protection for employees from the hazards identified in the hazard assessment. The purpose of this Personal Protective Equipment (PPE) Program is to document the hazard assessment, protective measures in place, and PPE in use at this company.

Hazard Assessment

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The basic element of our PPE program is an in depth evaluation of the equipment needed to protect against the hazards at the job site; this is the initial hazard assessment for which written documentation is required. In order to assess the need for PPE the following steps are taken: 1. Project Manager with other appropriate employees identifies job classifications where exposures occur or could occur. Project Manager examines the following records to identify and rank jobs according to exposure hazards:

- Injury/illness records
- First aid logs

2. Project Manager conducts a walk through survey of job site areas where hazards exist or may exist to identify sources of hazards to employees. They consider these basic hazard categories:Impact

- Heat or extreme cold
- Penetration
- Harmful dust
- Compression (roll over)
- Light (optical) radiation
- Chemical
- Electrical

During the walk through survey Project Manager observes and records the following hazards along with PPE currently in use (type and purpose):

- Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects
- Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.
- Types of chemical exposures
- Sources of harmful dust
- Sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.
- Sources of falling objects or potential for dropping objects
- Sources of sharp objects that might pierce the feet or cut the hands
- Sources of rolling or pinching objects that could crush the feet
- Certain electrical hazards such as electric shock or burns from electric arcs, blasts, or heat

3. Following the walk through survey, Project Manager organizes the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.

4. An estimate of the potential for injuries is now made. Each of the basic hazards is reviewed and a determination made as to the frequency, type, level of risk, and seriousness of potential

injury from each of the hazards found. The existence of any situations where multiple exposures occur or could occur is considered.

5. Project Manager documents the hazard assessment via a written certification that identifies the job site evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and that the document is a certification of hazard assessment. (See Appendix A).

Selection Guidelines

Once any hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

1. Become familiar with the potential hazards and the type of protective equipment (PPE) that are available, and what they can do.

2. Compare types of equipment to the hazards associated with the environment.

3. Select the PPE that meets selection requirements found in the OSHA regulations and ensures a level of protection equal to or greater than the minimum required to protect employees from the hazards.

4. Fit the user with proper, comfortable, well fitting protection and instruct each employee on care and use of the PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE. (See the Employee Training guidelines outlined in the next section of this program for a more detailed description of training procedures.)

It is the responsibility of Project Manager to reassess the job site hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed, but at least annually.

Elements that should be considered in the reassessment include:

- Adequacy of PPE program
- Accidents and illness experience
- Levels of exposure (this implies appropriate exposure monitoring)
- Adequacy of equipment selection
- Number of person hours that workers wear various protective ensembles
- Adequacy of training/fitting of PPE
- Program costs
- The adequacy of program records
- Recommendation for program improvement and modification
- Coordination with overall safety and health program

Employee Training

Supervisor provides training for each employee who is required to use personal protective equipment. Training includes:

- When PPE is necessary
- What PPE is necessary
- How to don, doff, adjust, and wear assigned PPE
- Limitations of PPE
- The proper care, maintenance, useful life, and disposal of assigned PPE

Each employee must demonstrate an understanding of the training and the ability to use the PPE properly before he/she is allowed to perform work requiring the use of the equipment. Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.

If Supervisor has reason to believe an employee does not have the understanding or skill required, he/she must retrain. Circumstances where retraining may be required include changes at our job site or changes in the types of PPE to be used, which would render previous training obsolete. Also, inadequacies in an affected employee's knowledge or use of the assigned PPE, which indicates that the employee has not retained the necessary understanding or skills, would require retraining.

Supervisor certifies in writing that the employee has received and understands the PPE training. Because failure to comply with company policy concerning PPE can result in employee injury as well as OSHA citations and fines, an employee who does not comply with this program will be disciplined for noncompliance according to the following schedule:

- Verbal warning for the first offense accompanied by retraining
- Written reprimand for the second offense that goes in the employee's permanent record
- Suspension without pay for a third offense and documentation in the permanent record
- Dismissal as a last resort.

Cleaning and Maintenance

It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisor is responsible for ensuring compliance with cleaning responsibilities by employees. If a piece of PPE is in need of repair or replacement it is the responsibility of the employee to bring it to the immediate attention of his or her Supervisor. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE

that cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.

PPE Specific Information

It is the policy of the company that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear

Appropriate work clothing must be worn at all times to protect against exposure to physical and chemical hazards (e.g., long pants, shirts with a minimum of a three-inch sleeve, gloves, and durable work shoes).

Head (Protects against falling, bumping, splashing, electrical hazards)

Hard Hat

Hearing (Over 90 Decibels for 8 hours a day requires hearing protection; must be worn to prevent exposure to or injury from potentially damaging noise levels when workers are exposed to noise at noise levels of 90 dB (A) or when they have to shout in order to communicate)

- Ear Muffs
- Ear Plugs

Face/Eye (Working with any chemical or using any mechanical equipment)

- Face Shield: Protect face from splashing and particles
- Safety Glasses: Protection from solids (cutting, sanding, grinding.)
- Safety Goggles: Protects eyes from splashing

Hi Vis Clothing

To protect workers against hazards of low visibility, and to enhance the visibility of workers who are exposed to struck-by hazards, it is the policy of the company that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear hi vis clothing that complies with ANSI/ISEA 107-2010.

Hi Vis clothing must:

- Have 360 degree visibility.
- Be orange, re-orange or yellow –green fluorescent background.
- Higher hazard class requires more area of background and reflective trim.

Conspicuity Class

Class 1: Low risk

- Worker can give full and undivided attention to approaching traffic.
- Ample separation of pedestrian worker and vehicle traffic.

- Background not complex.
- Vehicle / equipment speeds don't exceed 25 mph

Class 2: Medium risk

- Greater visibility is desired during inclement weather.
- Complex backgrounds are present.
- Employees perform tasks which divert attention from approaching vehicle traffic.
- Vehicle /equipment exceed 25 mph (but less than 50 mph).
- Work activities take place in or near vehicle traffic

Class 3: High risk

- Workers exposed to traffic >50 mph.
- Pedestrian worker and vehicle operator have high task loads.
- Wearer must be conspicuous through the full range of body motions at a minimum of 390 m (1/4 mile) and must be identifiable as a person
- Class 3 Conspicuity requirements cannot be met with a conventional vest alone

Foot Protection (To help prevent foot injuries, ankle injuries, slips, and falls.)

- Durable work boots shall be worn at all times. Tennis shoes are prohibited.
- Water/Chemical Resistant Booties: Use in a spill situation
- If electrical hazard present ensure boots offer protection.

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided PPE to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

Appendices

Certification of Hazard Assessment Work Area/Type of PPE Required

Certification of Hazard Assessment

1

Work area:	Hazard(s):	Degree of hazard:	PPE already in use

1

1

4

15

Person certifying

Date

Work Area/Type of PPE Required

/

1

Work Area:	Type of PPE Required:

1

RECORDING AND REPORTING INJURIES AND ILLNESSES

Purpose

This Recording and Reporting Occupational Injuries and Illnesses Compliance Program explains our company's process for meeting the requirements of 29 CFR 1904. This regulation allows the Bureau of Labor Statistics under the U.S. Job site of Labor to uniformly gather statistics on occupational injuries and illnesses. With this data, the Occupational Safety and Health Administration (OSHA) can identify and solve work-related exposures nationwide through new and revised regulations and guidance.

At the same time, the data can help Benton Technical Services, Inc. identify its own company exposures and solve them with improved engineering, administrative, and work practice controls. It is essential that data we record be uniform, to assure the validity of the statistical data. This program is ultimately designed for the safety and health of our employees.

Benton Technical Services, Inc. involves its employees in recordkeeping and reporting by informing each employee of how he or she is to report an injury or illness to us and providing limited access to our injury and illness records for our employees and their representatives.

Administrative Duties

Operations Manager is responsible for developing and maintaining this written program. This person has full authority to make necessary decisions to ensure the success of this program. Copies of this written program may be obtained from Operations Manager. If after reading this program, you find that improvements can be made, please contact Operations Manager. We encourage all suggestions because we are committed to the success of this written program.

Employee Involvement

One of the goals of our program is to enhance employee involvement in the recordkeeping process. We believe that employee involvement is essential to the success of all aspects of safety and health for the company. This is especially true in the area of recordkeeping, because free and frank reporting by employees is the cornerstone of the system. If employees fail to report their injuries and illnesses, the "picture" of the job site that the OSHA forms reveal will be inaccurate and misleading. This means that our company and our employees will not have the information we need to improve safety and health at our job site.

We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Employee Injury and Illness Reporting System

Employee reports of injuries and illnesses are taken seriously by our company. We use the following method for reporting:

 Employees injured or witnessing an injury on the job are to report the injury to Supervisor as soon as possible after an injury, regardless of how insignificant the injury may appear. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefit procedures. Any delay in the notice to Benton Technical Services, Inc. can delay the payment of benefits. A delay of more than 45 days may result in the loss of all benefits. "Near miss" accidents (e.g., when an employee nearly has an accident but is able to avoid an injury or illness) should be reported as well.

- 2. Supervisor will determine the best course of treatment.
- 3. Operations Manager is then to complete the **Illinois Form 45: Employer's First Report of Injury** and send it to Corkill Insurance Agency.
- 4. Any employee witnessing an accident at work is to notify Supervisor so he/she can get the injured employee required first-aid or medical attention.

Our reporting system ensures that Operations Manager receives the report. Operations Manager has examined our existing reporting policies and practices to ensure that they encourage and do not discourage reporting and participation in our program. Also, Benton Technical Services, Inc. does not discriminate against employees who file a work-related injury or illness or any other safety and health complaint.

Training

Our employees are expected to understand our occupational injury and illness reporting system, so that reports of work-related injuries and illnesses are received in a timely and systematized manner. Supervisor is responsible for training each employee in how and when to report a work-related injury or illness.

Training topics include:

- Medical providers for treatment of work related injuries.
- Accident Reporting vs. Accident Investigation
- Accident Reporting and Accident Investigation Procedures
- Impact of Accident Reporting and Accident Investigation on keeping operating costs down

Training is done annually. All training and information is provided in a language the trainees will understand. The company's training program includes an opportunity for employees to ask questions and receive answers.

Operations Manager is responsible for keeping records certifying each employee who has successfully completed training.

Recording Injuries and Illnesses

Benton Technical Services, Inc. keeps records of its employee fatalities, injuries, and illnesses.

Each recordable injury or illness is entered on an Illinois Form 45: First Report of Injury, OSHA 300 Log, and a separate, confidential list of privacy-concern cases, if any, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

Operations Manager keeps these records up to date.

If there is a privacy-concern case, we have the option to not enter the employee's name on the OSHA 300 Log. Instead, the text "privacy case" is entered where the name is normally placed. Employees may request to have their names not entered on the log.

Annual Summary

At the end of each calendar year, Operations Manager performs the following steps:

- 1. Reviews OSHA 300 Log to verify that the entries are complete and accurate,
- 2. Corrects any deficiencies identified in the entries,
- 3. Creates an annual summary of injuries and illnesses recorded on OSHA 300A,
- 4. Ensures that Company Officer certifies that he/she reasonably believes, based on his/her knowledge of the process by which the information was recorded, that the annual summary is correct and complete, and
- 5. Posts the Annual Summary February 1st April 30th of the year following the year covered by the form.

Employee Access to Report Forms

All employees, former employees, their personal representatives, and their authorized employee representatives have a right to access our regulatory-required injury and illness records, with the following limitations:

- We are allowed to give an employee, former employee, or personal representative a copy of current or stored OSHA 300 Logs by the end of the next business day.
- We may choose to not record the employee's name on the OSHA 300 Log in order to protect the privacy of injured and ill employees in certain privacy-concern cases.
- We are allowed to give an employee, former employee, or personal representative a copy of IL Form 45 for that employee by the end of the next business day.
- We are allowed to give authorized employee representatives under a collective bargaining agreement a copy of information on the IL Form 45 (including case number from the OSHA 300 Log, date of injury/illness, time employee began work, time of event, what the employee was doing just before the incident occurred, what happened, what the injury/illness was, what object or substance directly harmed the employee, and whether or not the employee died/when death occurred) within seven (7) calendar days, taking care to remove all other information.
- While the first copy is free, we may charge a reasonable amount for retrieving and copying additional copies.

Employees also have access to the Annual Summary, which is posted February 1st – April 30th following the year covered by the form.

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Benton Technical Services, Inc. does not discriminate against employees who request access to any records required by OSHA or otherwise exercise any rights afforded by the OSH Act.

Record Retention

Operations Manager saves the following records for five (5) years following the end of the calendar year that these records cover.

During the storage period, Operations Manager updates OSHA 300 Logs to include any newly discovered recordable injuries or illnesses and any changes that have occurred in the classification of previously recorded injuries and illnesses. If our company changes ownership, Operations Manager is responsible for transferring the Part 1904 records to the new owner.

Company Records

- IL Form 45: First Report of Injury
- SHA 300 Log
- > OSHA 300A Summary Form

Reporting Fatalities and Hospitalizations

Within eight (8) hours after the death of any employee from a work-related incident or the inpatient hospitalization of three (3) or more employees as a result of a work-related incident, Operations Manager is responsible for orally reporting the fatality and/or multiple hospitalization by telephone or in person to the Area Office of the Occupational Safety and Health Administration (OSHA), U.S. Job site of Labor, that is nearest to the site of the incident. If we cannot talk to a person at the Area Office, we use the OSHA toll-free central telephone number, 1-800-321-OSHA (1-800-321-6742).

Operations Manager will provide the agency the following information:

- > Company name,
- Location of the incident,
- Time of the incident,
- Number of fatalities or hospitalized employees,
- Names of any injured employees,
- Contact person and telephone number, and
- > A brief description of the incident.

Fatalities or multiple hospitalization incidents resulting from a motor vehicle accident or on a commercial or public transportation system do not require reporting. However, these injuries must be recorded on our injury and illness records if required.

Other Reporting

When an authorized government representative asks for the records we keep under 29 CFR 1904 Recording and Reporting Occupational Injuries and Illnesses, Operations Manager provides copies of the records within four business hours of the request.

If we receive OSHA's annual survey form, Operations Manager fills it out and sends it to OSHA or OSHA's designee, as stated on the survey form, within 30 calendar days, or by the date stated in the survey form, whichever is later. If our company receives a Survey of Occupational Injuries and Illnesses Form from the Bureau of Labor Statistics (BLS), or a BLS designee, Operations Manager promptly completes the form and returns it following the instructions contained on the survey form.

Appendices

Our company has included the following documents as appendices to this written program:

IL Form 45: First Report of Injury OSHA 300 Log OSHA 300A Summary Form

d

Employer of Ent	Date of report	Case or File #	Is this a lost workday case?					
			Yes No					
Employer's name	- I	Doing business as	Doing business as					
Employer's mailing address	nployer's mailing address							
Nature of business or service			SIC code					
Name of workers' compensatio	n carrier/admin.	Policy/Contract #	Self-insured?					
Employee's full name		I	Birthdate					
Employee's mailing address			Employee's e-mail address					
Gender	Marital status	# Dependents	Employee's average weekly wage					
Male Female	Married	Single	Date hired					
Time employee began work	Date and time of accid	lent	Last day employee worked					
If the employee died as a result	l t of the accident, give the da	te of death. Did the accident of	occur on the employer's premises?					
Address of accident		Yes	No					
What was the employee doing	when the accident occurred?							
How did the accident occur?								
What was the injury or illness?	List the part of body affecte	d and explain how it was affected.						
What object or substance, if ar	ny, directly harmed the emplo	oyee?						
Name and address of physician	/health care professional							
If treatment was given away fr	om the worksite, list the nam	e and address of the place it was	given.					
Was the employee treated in a	n emergency room?	Was the employee hospital	ized overnight as an inpatient?					
Yes No		Yes No						
	Circulation of the second s	Title and telephone #	Empil address					

By law, employers must keep accurate records of all work-related injuries and illness (except for certain minor injuries). Employers shall report to the Commission all injuries resulting in the loss of more than three scheduled workdays. Filing this form does not affect liability under the Workers' Compensation Act and is not incriminatory in any way. This information is confidential. IC45 8/12

Safety Program

OSHA's Form 300 (Rev. 01/2004) Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

City

Establishment name



State

Form approved OMB no. 1218-0176

You must record information about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR 1904.8 through 1904.12. Feel free to use two lines for a single case if you need to. You must complete an injury and illness incident report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call you local OSHA office for help.

	Identify the person			Describe the	case	Classi	fy the case	•																
(A) Case No.	(B) Employee's Name	(C) (I Job Title (e.g., Dat Welder) inju	(C) Job Title (e.g., Welder)	(C) Job Title (e.g., Welder)	(C) Job Title (e.g., Welder)	(C) Job Title (e.g., Welder)	(C) Job Title (e.g., Welder)	(D) (E) (e.g., Date of Where the event injury or Loading dock nor	(D) .g., Date of injury or	(D) e.g., Date of injury or	(E) Where the event occurred (e.g. Loading dock north end)	(F) .g. Describe injury or illness, parts of body affected, and object/substance that directly injured or made		ONLY ONE t serious outc	box for each ca come for that ca	ase based on ase:	Enter the nu days the inju worker was:	mber of ured or ill	Check th	e "injur	y" colum illne	in or cho ess:	iose one	type of
			onset of illness (mo./day)		person ill (e.g. Second degree burns on right forearm from acetylene torch)	Death	Days away from work	Remain Job transfer or restriction	ed at work Other record- able cases	Away From Work (days)	On job transfer or restriction (days)	njury (⊠)	Skin Disorder	Respiratory Condition	Poisoning	Hearing Loss	All other illnesse							
						(G)	(H)	(1)	(J)	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)							
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OSHA's Form 300A (Rev. 01/2004) Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordieeping rule, for further details on the access provisions for these forms.

Number of Cases



Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact. US Department of Labor, CSHA Clifice of Statistics, Room N-3644, 200 Constitution Ave. My. Washination, DC 20210. Do not send the completed forms to this office.

Year	
U.S. Depar Occupational Safety and	tment of Labor Health Administration
Form approv	ed OMB no. 1218-0176

Estat	blishment information	
)	Your establishment name	
5	Street	
C	City State	Zip
ļ	Industry description (e.g., Manufacture of motor truck trailers)	
5	Standard Industrial Classification (SIC), if known (e.g., SIC 3715)	
DR N	North American Industrial Classification (NAICS), if known (e.g., 336212)	
mpl	loyment information	
A	Annual average number of employees	
T Y	Total hours worked by all employees last year	
ign	here	
,	Knowingly falsifying this document may result in a fine.	
l	I certify that I have examined this document and that to the best of my knowledge the er complete.	tries are true, accurate, and
	Company executive	Title
	Phone	Date

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RETURN-TO-WORK PROGRAM

Purpose:

It is the intent of Benton Technical Services, Inc.'s Return-To-Work (RTW) Program to provide temporary modified-duty for employees who are partially disabled due to illness or injuries. Each job site will attempt to accommodate employees who cannot perform the basic duties of their job. This policy provides guidelines for administering a modified duty program to limit the number of lost workdays an injured or ill employee may incur by providing meaningful work of a restricted or limited nature.

Benton Technical Services, Inc. shall make every effort to bring ill or injured employees back to work as long as this will not cause any harm to the employee, others, or company property. Benton Technical Services, Inc. shall strive to assist the employee to return to his or her former position, and to cooperate in the employee's rehabilitation.

Scope:

Benton Technical Services, Inc. will provide temporary transitional duty whenever possible.

Objectives:

The objectives of Benton Technical Services, Inc.'s Return-To-Work Program are to:

- Allow the employee to remain in the work force and resume productive employment as soon as possible.
- Enable the worker to gradually overcome medical restrictions through a transitional period of modified-duty, work reconditioning assignments.
- Comply with all applicable parts of the Americans with Disabilities Act (ADA) and with all appropriate parts of the Family and Medical Leave Act (FMLA).
- Comply with all applicable state laws

Type of Work:

Benton Technical Services, Inc. will provide temporary transitional duty whenever possible and practical, and will cooperate in every way possible to provide regular duties on a limited basis, modified duty, and/or special assignments for the recovering employee. Whenever possible, attempts will be made to allow the employee to remain in his or her original classification or job function with modified duties.

Special assignments and/or modified duties in addition to regular duties will be determined by Operations and by the Supervisor of the job site in which the employee will be working after taking into consideration the employee's medical restrictions.

Also, the appropriate labor representative will review all special assignments and/or modified duty assignments.

Benton Technical Services, Inc. maintains the right to assign employees on modified duty to any job within the facility that will not exceed their restrictions and they are capable of doing.

Modified duties may not be desirable to the employee. Job availability for work related injuries will take precedence over non-work related injuries.

Employees on modified duty may be assigned to work on any shift at the discretion of the company. While modified duty employees may not be able to work or be assigned to work a full-time schedule, in no case shall modified duty employees work overtime.

Operations Manager will supervise all employees undergoing rehabilitation and/or modified duty. When these employees are assigned to their regular job sites, they will report to the supervisor in that job site under the direction of Operations Manager. Employees undergoing rehabilitation who are not working in their regular job sites will be given assignments by Operations Manager.

On evening shifts, night shifts, and weekends, modification of job duties may be made at any time by the Supervisor of an employee who has reported an injury, until the employee sees Operations Manager.

Medically Unable to Report:

Any person who is unable to report for work due to an injury or illness, whether that injury or illness occurred at our job site or not, must check in with Operations Manager at least weekly. The injured employee may be asked to produce appropriate medical documentation on his or her condition to verify there has or has not been a change in their physical status as it affects returning to work. At the discretion of the Workers Compensation insurance carrier the employee may be asked to see a physician that Workers Compensation insurance carrier designates.

Employee's Responsibilities:

The employee shall be responsible to report all job-related injuries and any medical restrictions to his/her immediate Supervisor and Operations Manager. Any delay in the notice to Benton Technical Services, Inc. can delay the payment of benefits. A delay of more than 45 days may result in the loss of all benefits. The employee shall keep his/her Supervisor and Operations Manager informed of any change in job-related restrictions.

The employee shall adhere to all medical advice and directives as prescribed by the treating physician, nurse, or other medically qualified professional. The employer should question any medical directives which may not be clearly understood. Failure to adhere to any medical restrictions may result in disciplinary action

The employee shall not perform any activity which is not in accord with job-related restrictions, **both on and off the job**. If the employee feels that tasks have been assigned which violate these restrictions, he or she should immediately inform his or her Supervisor. Failure to adhere to any work-related medical restrictions may result in disciplinary action.

Doctor's Appointments:

1

Benton Technical Services, Inc.'s notification policy regarding doctor's appointments will also apply to employees undergoing rehabilitation. If the employee requires follow-up treatment or a doctor's appointment which cannot be scheduled during his or her non-working time, Benton Technical Services, Inc. shall compensate the employee for any straight-time lost from work due to said treatment or appointment; provided that the employee must have given Benton Technical Services, Inc. sufficient and reasonable prior notice that such treatment or appointment could not be scheduled during non-working time, in which case Benton Technical Services, Inc. shall have the right to attempt to change the employee's treatment or appointment to non-working time and, if able to do so, the employee shall not be entitled to compensation if the employee chooses nevertheless to keep the treatment or appointment on working time.

Failure to Participate:

Employees who are assigned to modified duty are expected to keep medical appointments and participate in follow-up rehabilitation treatment as necessary. Failure of the employee to participate in medical and rehabilitation treatment may be considered a violation of work rules and may result in disciplinary action.

Supervisor's Responsibilities:

The Supervisor for the area that the injured employee is assigned for modified duty shall ensure that the employee is complying with job-related restrictions as noted on the modified duty form.

Supervisors directing modified duty employees shall assign those employees to jobs which can accommodate their restrictions. If no jobs are available within your job site, contact Operations Manager to discuss options or arrange for job site transfer.

Program Coordination:

Operations Manager will coordinate the Return-To-Work Program. This includes the responsibility to review and update the program as needed to ensure that it meets the needs of Benton Technical Services, Inc. and its employees.

Decisions regarding the appropriateness of modified duty and contacts with the affected employee, the employee's supervisor, labor representatives, and medical personal shall be made by Operations Manager.

Operations Manager will arrange for temporary work assignment for modified duty employees where no appropriate work is available within the employee's regular job site.

Operations Manager will be the primary contact with all physicians and medical professionals, and shall provide information on an injured employee's current job description, the modified duty policy, and the types of modified duty which are available.

Operations Manager will also provide such physicians with periodic updates and any change of status relating to the modified duty program. If additional information is requested by medical professionals, such as job descriptions for a specific ill or injured employee, <<mark>NAME</mark>> shall provide such additional information.

Operations Manager shall schedule all employees' medical appointments as necessary, and keep all necessary and appropriate records.

WORK ZONE SAFETY PLAN

Purpose

1

Controlling vehicle traffic through busy work areas is one of the most important – and dangerous – operations in construction.

Our company follows the Manual on Uniform Traffic Control Devices. MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all public streets, highways, bikeways, and private roads open to public traffic. The MUTCD is published by the Federal Highway Administration (FHWA) under 23 Code of Federal Regulations (CFR), Part 655, Subpart F.

The MUTCD is a compilation of national standards for all traffic control devices, including road markings, highway signs, and traffic signals. It is updated periodically to accommodate the nation's changing transportation needs and address new safety technologies, traffic control tools and traffic management techniques

Hazards

According to the Census of Fatal Occupational Injuries vehicles and equipment are two major hazards for the highway, street, and bridge construction industry. Some common hazards that employees may face while working at this work zone are:

• Employees being struck by vehicles or mobile equipment

Administrative Duties

Operations Manager is responsible for establishing and implementing the written Work Zone Safety Plan. This person has full authority to make necessary decisions to ensure the success of this program. Copies of this written plan may be obtained in main office.

Our company assigns Project Manager as the traffic control manager for each work zone location. Project Manager is knowledgeable in traffic control principles and has overall responsibility for the safety of the work zone setup.

Project Manager is responsible for reviewing the Temporary Traffic Control (TCC) Plan associated with the work zone and, during contract negotiations, negotiating with the contracting agency as to revisions to the TCC Plan that are needed to ensure worker safety.

Project Manager is responsible for informing the public of the location and timetable of the work zone project.

Work Zone Layout

Project Manager is responsible for ensuring that the work zone is set up in accordance with the *Manual on Uniform Traffic Control Devices* (MUTCD) and, if required, Chapter 9 of the American Association of State Highway and Transportation Officials (AASHTO) *Roadside Design Guide*.

Project Manager is responsible for evaluating the effectiveness of the temporary traffic control setup.

We authorize the Project Manager and/or Supervisor to temporarily halt work until unsafe conditions related to temporary traffic control have been eliminated.

Project Manager is responsible for documenting temporary traffic control setup and changes throughout the course of this project. We retain these records in a job file located at main office as a reference for future jobs.

Temporary Traffic Control and Other Protective Devices

All traffic control signs or devices used for protection of our employees, at a minimum, conform to Part VI of the MUTCD (1988 Edition, Revision 3 or the Millennium Edition).

Project Manager and/or Supervisor is responsible for ensuring that all traffic control devices are placed correctly, operating properly, and in place at all times.

There are five (5) basic considerations for traffic control devices:

- 1. Fulfill a specific need,
- 2. Command attention,
- 3. Convey a clear and simple meaning,
- 4. Command respect of the road user, and;
- 5. Give adequate time for proper response.

Flaggers

The use of flaggers and flagger signaling and warning garments must conform to Part VI of the MUTCD (1988 Edition, Revision 3 or the Millennium Edition). However, flagging is dangerous because it exposes the flagger to traffic. It is the policy of Benton Technical Services, Inc. to permit only those employees qualified by training or experience to work as flaggers.

Our company will be using flaggers on this work zone. We provide training for our flaggers that is consistent with their level of responsibility and work zone conditions.

Training covers the following flagger training topics:

- The Manual on Uniform Traffic Control Devices (MUTCD)
- ANSI standard ISEA-107-1999
- Understand why proper flagger operations are important
- Learn the abilities of a good flagger
- Apply standard flagger control references
- Identify proper flagging signals and procedures
- Learn flagger practices for various typical situations

Flaggers must demonstrate:

- A. Ability to receive and communicate specific instructions clearly, firmly, and courteously;
- B. Ability to move and maneuver quickly in order to avoid danger from errant vehicles;
- C. Ability to control signaling devices (such as paddles and flags) in order to provide clear and positive guidance to drivers approaching a temporary traffic control zone in frequently changing situations;
- D. Ability to understand and apply safe traffic control practices, sometimes in stressful or emergency situations; and
- E. Ability to recognize dangerous traffic situations and warn workers in sufficient time to avoid injury.

Operations Manager is responsible for keeping flagger training certification records.

Supervisor is responsible for conducting an onsite orientation whenever a flagger starts a new job.

Machinery, Equipment, and Maintenance

Maintaining and operating equipment properly is fundamental to safety and a primary employer responsibility. Our equipment and vehicle drivers are required to have a valid driver's license. Operations Manager is responsible for verifying that our drivers have valid drivers' licenses. Operations Manager is responsible for verifying that equipment and vehicle drivers are trained correctly to operate the equipment they will be using, and Operations Manager is responsible for training equipment and vehicle drivers. Operations Manager keeps records of employee training. Operations Manager assigns responsibilities for equipment.

Daily inspections prior to using machinery and equipment are an important part of equipment safety. Operations Manager is responsible for overseeing these mandatory inspections, seeing that necessary repairs are made, that scheduled maintenance is performed, and that records of all inspections and repairs are maintained.

When maintaining or troubleshooting equipment--or leaving it unattended--the policy of our company is to follow lockout/tagout procedures to guard against hazardous energy injuries and unauthorized use.

Safe Work Practices

Our company feels that while the safety of the public traveling through the work zone is important, we realize that the safety of the worker performing tasks within the work zone is equally as important.

Our safe work practices for working in work zones include:

- Road user and worker safety and accessibility are an integral and high priority element of every project from planning through design and construction.
- Road user movement is inhibited as little as practical.
- Motorists, bicyclists, and pedestrians are guided in a clear and positive manner.
- To provide acceptable levels of operations, routine day and night inspections of the work zone are performed
- Attention is given to the maintenance of roadside safety during the life of the work zone
- Good public relations are maintained.
- Temporary Traffic Control "Work Zone" components (diagram below); follow the requirements of The Manual of Uniform Traffic Control Devises for Streets and Highways (MUTCD).
- Employees exposed to public vehicular traffic are provided with, and must wear; warning vests or other suitable garments marked with or made of reflectorized or highvisibility material.
- Flaggers are trained in safe traffic control practices and public contact techniques.

Personal Protective Equipment

At the work zone, impact injuries from equipment or construction materials or from flying or falling objects are constant dangers. Personal protective equipment is an excellent defense against these and other hazards. The types of personal protective equipment that we will use at this work zone include:

Hi Vis Clothing

To protect workers against hazards of low visibility, and to enhance the visibility of workers who are exposed to struck-by hazards, it is the policy of the company that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear hi vis clothing that complies with ANSI/ISEA 107-2010.

Hi Vis clothing must:

- Have 360 degree visibility.
- Be orange, re-orange or yellow –green fluorescent background.

• Higher hazard class requires more area of background and reflective trim.

Conspicuity Class

Class 1: Low risk

- Worker can give full and undivided attention to approaching traffic.
- Ample separation of pedestrian worker and vehicle traffic.
- Background not complex.
- Vehicle / equipment speeds don't exceed 25 mph

Class 2: Medium risk

- Greater visibility is desired during inclement weather.
- Complex backgrounds are present.
- Employees perform tasks which divert attention from approaching vehicle traffic.
- Vehicle /equipment exceed 25 mph (but less than 50 mph).
- Work activities take place in or near vehicle traffic

Class 3: High risk

- Workers exposed to traffic >50 mph.
- Pedestrian worker and vehicle operator have high task loads.
- Wearer must be conspicuous through the full range of body motions at a minimum of 390 m (1/4 mile) and must be identifiable as a person
- Class 3 Conspicuity requirements cannot be met with a conventional vest alone

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided PPE to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

Program Evaluation

It is inherent that problems may occasionally arise in this Work Zone Safety Program. By thoroughly evaluating and, as necessary, promptly taking action to correct any deficiencies in our program, we can eliminate problems effectively.

At Benton Technical Services, Inc., our program evaluation is performed annually by Operations Manager.