HUDSON BAY® INSULATION

Energy Efficiency Specialists™

Safety & Risk Management Plan 2024

Washington

Revised January 8th, 2024

Where SAFETY Matters Most

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POLICIES

Hudson Bay Insulation Company is dedicated to providing a safe and healthy work environment free of hazards for all employees. We consider the prevention of accidents to be an integral part of our operations. To accomplish this, HBIC has adopted the following policies.

- Safety, in all operations, is of the utmost importance.
- The Company will comply with all laws, ordinances, and project requirements.
- Every employee will have a safe and healthy place in which to work.

To maintain these objectives, it is the responsibility of the Corporate Officers, Project Managers, Superintendents, Safety Representatives, Foremen, and Employees:

- To always maintain and reinforce a comprehensive safety program.
- To make every reasonable effort to maintain a neat, clean, safe, and healthy working environment.
- To comply with all federal, state and project requirements for accident/incident prevention and working conditions.
- To ensure that all employees use the safety equipment required and they adhere to established rules of conduct and safety in their assignments.

Hudson Bay Insulation Company recognizes and accepts responsibility for the prevention of accidents in the workplace. A thorough understanding of, and compliance with, safety policies, practices and procedures is the best insurance an employee can have against accidents. I ask for your commitment to these principals to assure the safety of yourself and your co-workers.

Sincerely,

Greg Zevely
President

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The following general safe work practices apply to all Hudson Bay Insulation Company (HBIC) projects and its employees. Additional rules may be added based upon Project Specific Hazards or Requirements.

It is important to remember that rules cannot be created to cover every condition on a construction site. The most important element in prevention of injuries is a positive safety attitude.

- Follow all HBIC project safety policies, procedures, and safe work practices.
- Employees shall be trained in all work practices.
- Report any accident/incident to your supervisor and the safety department immediately.
- Report any unsafe conditions to your supervisor immediately.
- Follow training and safe work practices during confined space entry, lock out/tag out and opening of process equipment.
- Communicate to our customers and others affected any hazard that we create that would be unique to the facility or any hazards we find.
- Always wear the appropriate work clothing, footwear, and Personnel Protective Equipment (PPE).
- Safety glasses and gloves will be worn at **all** times.
- All employees must be familiar with emergency procedures and locations of fire extinguishers and first aid supplies.
- Compliance with HBIC's Drug-Free Workplace Policy is mandatory.
- Use provided handrails while ascending or descending stairs and equipment.
- Never violate any warning signs or barricades.
- If you are not sure how to perform your assigned task safely, stop and contact your supervisor immediately.
- No fighting, horseplay, stealing or running.
- Help promote good housekeeping, this includes proper disposal of job debris, lunch, or other personal items brought to the job.
- Operate only the equipment that you have been trained and authorized to use.
- Do not walk or stand under suspended loads.

- Think before you lift…
  - Plan the lift.
  - Move close to the load.
  - Keep your back straight.
  - Bend your knees & lift with your legs.
  - Do not lift and twist in the same motion.
  - If the load is too heavy get help from a co-worker
- Participate in the company or G.C. Stretch and Flex Program prior to shift.
- Always use equipment and material in accordance with the manufacturers' specifications.
- Smoking is permitted in designated areas only.
- SDS (Safety Data Sheets) are available to all employees, contact the supervisor for copies.
- Employees shall respect the confidentiality of trade secret information you may become privy to.

Failure to abide by the safety policies and procedures will be subject to corrective action up to and including immediate termination.

It is Hudson Bay Insulation Company's intent to have all employees involved in safety. It is requested and HBIC supports and encourages employees to report all incidents, situations and near misses which they believe or perceive, could cause injury or illness.

Safety Concerns may be reported to any of the following personnel:

- Direct Supervisor
- Safety Director: Chris Jenkins
- Safety Coordinator: Jennifer Moreau
- Division Superintendents: Ryan Maneval, Chris Borodenko, or Joel Craig Jr.
- Any member of the HBIC Safety Team
- Division Manager: Kyle Spane
- Company President: Greg Zevely

All concerns will be documented and the division superintendent and/or safety representatives are responsible for reporting back to the employee any resolution of the concern.

All near misses and hazardous conditions will be reported to the general/mechanical contractor's superintendent.

HBIC employees will conduct weekly Safety Meetings specific to HBIC and our scope of work. Topics are based on current activities relevant to the work at hand. This time shall also be used to discuss specific situations, tasks, working conditions and to provide feedback from the employees to the foreman.

All safety complaints, inspections and citations will be addressed and coordinated through the safety department. If a regulatory agency cites a HBIC employee or a jobsite of which HBIC employees are working on. The safety department will fully cooperate with that agency and its representatives to seek resolution. All complaints, inspections and citations will be kept on file at Hudson Bay Insulation Company's main office.

These procedures shall be used for the prevention of accidents, creating a safe and healthy place to work, maintaining safe equipment, creating a proper safety reporting and records system, and creating a safety program that meets or exceeds all federal, state, or local laws and ordinances.

The **Safety Director** shall be responsible for the conformance of all employees to the safety rules as set forth in current federal, state, and local legislation and all company safety or health requirements. The Safety Director shall also be responsible for the following procedure requirements:

- Conduct safety orientation for new employees.
- Instruct employees on safe work procedures by means of safety meetings, policies, and training.
- Conduct site safety audits and inspections.
- Provide safety and first aid education materials and instructions.
- Approve procurement of first aid and safety equipment.
- Approve procurement of major repairs of equipment to meet safety requirements.
- Enforcement of corrective action on reported unsafe job conditions.
- Enforcement of corrective action for reported safety violations by employees and extent of action to be taken for second reported violation.
- Establish methods and procedures for project specific drug testing, outside of company drug-free workplace policy.

The **Project Foremen** shall be responsible for conformance of all job site personnel assigned to them, to all safety rules as set forth in current federal, state, and local legislation in addition to company required safety and health requirements. The Project Foremen shall also be responsible for the following procedural requirements:

- Instruct employees on safe work procedures by means of safety meetings, pre-task planning and training.
- Ensure availability of and proper use of all necessary PPE and first aid supplies.
- Identify unsafe acts and potential unsafe conditions on the jobsite.
- Completion of Employee information report to the Superintendent.
- Conduct weekly on-site Toolbox Talks and Safety Meetings.

- Maintain all field reports as per job specifications.
- Supervise corrective measures for all reported unsafe conditions.
- Report equipment repair as needed to the Safety Director.
- Report all accidents to the Superintendent or Safety Director immediately.
- Issuance of personal safety equipment required by job site conditions and the enforcement of their use by company personnel.

The **Employee** shall be responsible for conformance to all safety rules as set forth in current federal, state, and local legislation and company required safety policies and procedures and health requirements. The Employee shall also be responsible for the following procedure requirements:

- Adhere to all safety policies and procedures as set forth by HBIC.
- Utilize all necessary Personal Protective Equipment (PPE) and safety devices.
- Report all unsafe conditions to HBIC supervision and the safety department.
- Perform all work according to Company's safe work practices.
- Refrain from all unsafe acts that may endanger you, co-workers, the public, or property.
- Participate in safety meetings, toolbox talks and other gatherings that provide the opportunity to discuss and provide feedback regarding safety issues and workplace conditions.
- Attending Company developed training and job focused instruction sessions.

The nature of the construction industry requires that all employees be in a condition to perform their jobs safely and efficiently, free from any impairment caused by alcohol or drugs. Being in an industry where the responsibility and alertness of each employee is necessary to maintain a safe environment, Hudson Bay Insulation Co. ("the Company") must have a greater concern for employee alcohol and drug use than other employers. The Company is firmly committed to eliminating all the problems associated with employee alcohol and drug abuse.

The Company also recognizes the need to avoid unnecessary intrusion into employees' private lives and to ensure employee privacy and confidentiality to the greatest extent possible. In addition, the Company acknowledges that some cases of substance abuse must also be dealt with as illnesses requiring medical treatment, not only as personnel problems. Lastly, the Company believe that the goals of its alcohol and drug policy should include education, prevention, and rehabilitation. To achieve these objectives, all employees of the Company must adhere to each of the following rules and regulations:

Rules

The use of alcohol or drugs by employees during working hours or on the job site or on company property (including company vehicles) is absolutely prohibited. Any employee who violates this policy may be required to undergo rehabilitation and/or may be subject to discipline under the terms of this policy and the collective bargaining agreement.

a. The term "use" means consuming, possessing, selling, concealing, distributing, or arranging to buy or sell, being under the influence, or reporting for duty under the influence of alcohol or drugs to any degree.

b. The term "alcohol or drugs" means any form of alcohol and/or other intoxicating substance, including legal drugs obtained illegally.

c. The term "under the influence" means having a verified positive test.

d. If any person taking medically authorized or prescribed drugs is to be tested for alcohol or drugs pursuant to this policy, that person must be prepared to substantiate authorization from his health care provider to use the prescription drugs.

e. This policy applies to all employees of the Company.

f. The term "working hours" means all the time in which employees are engaged in work duties or subject to the control of the company, and includes scheduled breaks and travel to work or from one workplace to another.

g. The term "company property" means all facilities, job sites, vehicles, and equipment that are owned, leased, operated, or utilized by the company or its employees for work-related purposes, including parking areas and driveways, as well as lockers, toolboxes, or other storage areas used by the

employees. It also includes other public or private property, facilities, vehicles, and equipment located away from the company facility if the employee is present on such property for a work-related purpose.

h. An employee's private property, such as lunch boxes, toolboxes, back packs, purses, and the like that are brought by the employee onto company property or used for work-related purposes, may only be inspected for reasonable suspicion (see below).

i. Events attended voluntarily are not considered to be covered under this policy.

Consequences of Violations
If an employee tests positive or refuses to test (including invalid urine specimens, adulteration, or substitution), he or she will be removed from the job.

Management shall require that employees who have tested positive for alcohol or drugs or who refuse to test complete three conditions before returning to work:

1. Evaluation by a qualified counselor,

2. Agreement to participate in education and/or counseling as recommended by the evaluator, and

3. A negative return-to-duty test.

The Program Administrator will monitor the return-to-work process. With a work release from the evaluator and a negative test, the employee may return to work if a job is available.

Any person who has violated this policy shall be subject to discipline. Discipline of bargaining unit members shall be in accordance with the collective bargaining agreement.

Reasonable Suspicion Testing
The term "reasonable suspicion" shall for the purposes of this policy be defined as specific, articulable observations concerning work performance, appearance, behavior, or speech of the employee which would cause a trained person to believe the employee may have used controlled substances or misused alcohol. Examples of observations which might lead to a reasonable suspicion determination are slurred speech, staggering, the odor of alcoholic beverage, unusual sleepiness, aggressive behavior, unusual agitation, or the presence of drugs or drug paraphernalia. These observations must be documented by a Company representative as part of a reasonable suspicion determination.

When reasonable suspicion exists that an employee is in violation of this policy, the employee shall be required by management to submit to drug and/or alcohol testing. In the event of a positive test result or refusal to test, the employee shall be required to participate in a return-to-duty process. If an employee refuses to participate in the testing as outlined in the policy or if an employee's test results

are positive and the employee refuses to seek rehabilitation or completion of a rehabilitation program, that employee is subject to prompt termination.

Other Testing
Other types of testing permitted under this policy, as defined in the Administrative Rules, include pre-duty, periodic, post-accident, return to duty, job site and random testing.

All new employees shall be tested if they have no documentation of equivalent testing within the previous six months. Any employee whose card date has a lapse time of greater than six months when changing employers will be deemed to be a new hire and will be required to retest.

This Policy requires all employees to be subject to random testing. The random computer selection procedure shall be administered by the Program Administrator. The names of employees who have tested positive or refused to test and successfully complete education and/or rehabilitation shall be returned to the group of employees subject to random testing in addition to such employees being subject to follow-up testing.

Many general contractors have drug and alcohol testing policies which cover all individuals who work on the specific contractor's job site. If a general contractor has a stricter drug testing policy and requires our employee to test under that policy, it will take precedence for that test. If the general contractor's policy is less strict than this Policy, then this Policy will take precedence for that test.

Drug-Related Convictions
All employees must notify management of any criminal conviction for any drug-related offense occurring in the workplace, no later than five (5) days after such conviction.

Self-Referral
If an employee suspects that he/she has an alcohol or drug problem, the employee is expected to seek assistance for that problem. The Program Administrator and the Company will provide informational assistance for any person who self-refers without negative consequences, if the self-identification takes place before the person is directed to test and before a performance issue or disciplinary action arises.

Reporting Use of Medications
Use of prescribed medicine according to the healthcare provider's instructions is not a violation of this Policy. However, *it is a violation of Federal law and of this Policy to use other people's prescription medications.* It is also a violation of this Policy to use medications in a way that is not consistent with the healthcare practitioner's directions.

Employees who take prescription medications with warning labels (regarding dizziness, drowsiness, or other impairment while using the medicine) are required to:

1. Discuss use of the medicine with their doctors, given the nature of their jobs, and

2. Inform Company management that they are using medication with a warning label. Employees are not required to identify the name of the drug or the reason for using the drug.

The notifications must be in writing, addressed to the designated Company representative. Management may change an employee's employment status or job duties at its discretion. With proper notification of prescription medication use, management will work with the employee to determine the next steps to protect the safety of the employee and the workplace.

Marijuana is a Schedule I controlled substance; its use is illegal under federal law. Some states permit marijuana for personal/recreational use or to treat medical conditions when authorized in writing by a licensed medical doctor ("medical marijuana"). These are not valid reasons for the presence of marijuana in employees' systems under this Policy. The presence of marijuana is prohibited regardless of the reason for use.

Applicants and employees can discuss positive drug test results due to prescription medications with the Company's Medical Review Officer (MRO) before results are reported to the Company.

Confidentiality
The Company shall take reasonable measures to safeguard the privacy of employees in connection with this policy, including maintaining the confidentiality of employees who come forward to discuss alcohol or drug abuse affecting them. Any person employed by the Company who voluntarily seeks assistance or rehabilitation for alcohol or drug related problems shall be granted amnesty and discipline is waived for drug-related issues so long as the person continues to participate satisfactorily in the rehabilitation or counseling program.

Compliance With State & Federal Law
Nothing in this policy is intended, nor shall it be construed, to authorize any action that is unlawful under federal or state law.

PROCEDURES

Hudson Bay Insulation employees are not to remove, touch or make friable any asbestos-containing material. The following information is for informational purposes only so that Hudson Bay employees can understand the process for their own protection. If you find any material that may contain asbestos, stop all work and all employees leave the area and notify the Safety Director immediately. Specialized training is required to work with asbestos as it is likely to be found in buildings built prior to 1978 used on pipe insulation, flooring, ceiling tiles, shingles, etc. Asbestos may also be found in newer construction and imported products.

General Information

The Safety Director is responsible for the establishment, implementation, and maintenance of all aspects of this program. Asbestos is a naturally occurring material once used widely in the construction industry. Its ability to withstand high temperatures and resist many chemicals made it useful for hundreds of applications; however, the widespread use of asbestos has left a dangerous legacy. The improper handling of asbestos-containing material may release harmful amounts of fiber. When inhaled, asbestos has been shown to cause the following diseases: Asbestosis, Lung Cancer, and Mesothelioma. If you have any concerns about material that you encounter and believe may be or contain asbestos, work activity must stop until a determination of what the material is has been made.

The Safety Director shall be contacted before any work begins on any project known to involve asbestos or has had asbestos removed. Remodeling and tie-in with existing buildings built prior to 1978 will probably contain asbestos. If you are working in a building that has or is perceived to have asbestos, you must follow and document the following procedures:

- No one is allowed to work in a building until a "Good Faith Survey" is received from the General Contractor, Owner, or Developer. Copies must be posted at the site and put in the main job file.
- Work crew(s) shall receive documented asbestos awareness training prior to work assignment and updated/refresher training as deemed necessary.
- If encountered, evaluate, and, if possible, seal off the area. Shut down the HVAC system to affected areas. Protect your crew as well as the public from the spread of contamination.
- Notify your Project Manager and the Safety Director, who will notify the Owner.
- Multi-contractor job sites: Communication to and from other trades will be a vital part of protecting all workers from exposure to asbestos.
- Document who found the material, who was exposed, where, time, who was contacted and what procedures were used.
- Do not attempt to remove, encapsulate, or cover up asbestos encountered, no matter how little there is.

To comply with governmental regulations and to ensure that information is available about the dangers related to temporary cord sets and receptacles, and to electrical equipment and tools used in connection with construction, the following Assured Equipment Grounding Program (AEGP) has been established. All HBIC employees will abide by the following program.

The procedure described herein is suitable for compliance with the requirements of WAC 296-155-447 (2) (iii). It is the policy of the undersigned to establish and implement an Assured Grounding Conductor Program covering:

Cord Sets and receptacles not a part of the permanent wiring of buildings or structures, and;

All electrical equipment and tools used in connection with processes of construction or alterations.

Ground Fault Circuit Interrupters (GFCI) are required by the captioned codes for all 120-volt, single phase, 15-20 ampere receptacle outlets which are not a part of the permanent wiring of a building or structure of/or on a construction project. As an alternative to the Ground Fault Circuit Interrupter requirement, it will be the policy of the undersigned to instruct employees not to use any equipment that does not meet the requirements of the Assured Grounding Program.

Job Site Information:

Procedure

All equipment to be used on the construction site shall be tested, identified, and coded using the following procedures with the exception of "double insulated" systems, which need not be tested.

Testing

- All equipment shall be tested before first use for grounding and continuity of the circuitry.
- Equipment returned to service following repairs shall be tested for continuity before being used.
- These tests shall be done quarterly, at intervals not exceeding once every three months.
- Tested equipment shall be identified by use of quarterly color coding.
- Equipment shall be visually inspected before use each day for external defects, including deformed or missing pins, insulation damage and indications of possible internal damage. Equipment shall not be used until repaired, re-tested and results recorded.

Recording
The aforementioned tests shall be recorded on the attached schedule and retained at the job site.

Use of Electric Circuit Testing Devices
A suggested testing procedure is as follows:

- **Receptacles:** Use receptacle tester to determine correct connections to terminals.

- **Cord Sets:** First, plug the cord set into a properly wired receptacle, which has been tested as above. Then, plug receptacle tester into the cord connector (female device) of cord set to determine both continuity of grounding conductor and correct connections to terminals.

- **Cord and Plug Connected Equipment:** Use continuity tester. Connect or touch one terminal of continuity tester to the metal frame of the equipment or tool and the other terminal to the grounding prongs of the attachment cap plug at the end of the cord. An audible (bell) or visual (light) signal of the tester indicates that this is continuity of the grounding conductor. Although not required by OSHA, it is suggested that this test also be made between the metal frame and each of the other two prongs of the attachment plug. If there is a signal for this test, it indicates a possible ground fault, and the tool should be checked further.

ASSURED GROUNDING COLOR CODING SCHEME

Month	Quarterly
January	White
February	
March	
April	Green
May	
June	
July	Red
August	
September	
October	Orange
November	
December	

The following Exposure Control Program (Bloodborne Pathogens) has been established to protect every Hudson Bay Insulation Company from the dangers of various microorganisms that may be present in human blood and bodily fluid that can cause disease. All HBIC employees will abide by the Exposure Control Program in accordance with WAC 296-823-130.

HBIC shall make available the Hepatitis B vaccine and vaccination to all employees who have occupational exposure and post-exposure medical evaluation who have had an occupational exposure incident.

All medical evaluations and procedures, including the Hepatitis B vaccine and vaccination series will be made at no cost to the employee, made available to the employee at a reasonable time and place and performed by or under a licensed physician or healthcare professional or facility.

Hepatitis B Vaccinations shall be made available within 10 working days of exposure; unless the employee previously received the complete Hepatitis B vaccinations series and antibody testing reveals that the employee is immune, or the vaccine is contraindicated for medical reasons.

- HBIC shall not make participation in a prescreening program a prerequisite for receiving the Hepatitis B vaccine.

- If the employee initially declines the vaccination, but at a later date (while still covered under the standard) decides to accept the vaccination, the employer shall make it available.

- HBIC shall ensure that employees, who decline the vaccinations offered, sign the statement in WAC 296-62-08050.

- If a routine booster is recommended by the US Public Health Service, such boosters shall be made available at no cost to the employee.

General Information
The Safety Director is responsible for the establishment, implementation and maintenance of all aspects of this Exposure Control Program and will review these procedures in accordance with the regulations and update them as required.

Exposure Determination
Affected employees are those who are considered exposed, or will potentially be exposed, to blood and/or other potentially infectious materials. This includes:

- Employees who have potential for exposure through the ordinary course of their work in an occupied or previously-occupied medical facility (e.g., craftsmen assigned to work on a project in a hospital, clinic, medical laboratory, or dental office).
- Employees for whom any exposure would be through tasks that may arise as a collateral function of their job performance (e.g., designated first aid responders who provide first aid/CPR in response to an emergency).

Methods of Compliance
Body Substance Isolation:

- *All human body fluids will be treated as if known to be infectious for blood borne pathogens.*

Engineering and Work Practice Controls

- Employees who work in areas where exposure may occur during their ordinary course of work in an occupied or previously-occupied medical facility may be provided site-specific training and instruction on the proper safe work necessary for that project. A written site-specific plan may be developed for each project. If needed this plan will be based on information obtained from the medical provider-client related to site-specific procedures and concerns.

- Employees who are first aid responders will be informed that, while they may be required to maintain current first aid/CPR certifications under the DOSH regulations, they are not required to provide first aid/CPR unless they so desire. Regardless of whether required to or not, all employees who provide first aid/CPR must use safe work practices and personal protective equipment to minimize their risk of exposure.

If an exposure occurs employees will be directed to:

- Wash their hands with soap and running water as soon as possible following the exposure (Since hand washing facilities are not always available, antiseptic towelettes/cleanser can be a substitute for immediate use until they can get to hand washing facilities)

- Report the incident as soon as possible to their supervisor and Safety Department and fill out an Employee Incident report.

- Report to our designated medical provider for evaluation and treatment.

- Complete a Washington State Industrial Insurance Accident Report or equivalent company form.

Following a report of an exposure incident, HBIC shall make immediately available to the exposed employee, a confidential medical evaluation and follow up including at least the following:

- Documentation of the routes of exposure and the circumstances under which the exposure occurred.

- Identification and documentation of the source individual, unless the employer can establish that identification is not feasible or prohibited by state or local law.

- The source individual's blood shall be tested as soon as feasible and after consent is given to obtain HBV, HCV, and HIV infection information. If consent is not obtained, the employer shall establish that legally required consent cannot be obtained. When the source individual's consent is not required by law, the source individual's blood (if available) will be tested. When the source individual is already known to be infected with HBV, HCV, or HIV, testing of the source individual is not necessary.

- Results of the source individual's test shall be made available to the exposed employee, and they shall be informed of the applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

Personal Protective Equipment

- Personal protective equipment appropriate to minimize potential exposure will be provided. Additionally, a biohazard bag, household bleach (or another type of disinfectant approved for use by the medical provider-client) and utility gloves will be available if area or equipment cleanup is needed.

- At projects where exposure during the ordinary course of work in an occupied or previously occupied medical facility may occur, the type and use of equipment will be determined based on the project with input from the medical provider-client related to the site-specific procedures and concerns. The site-specific written plan will document the type, use and handling of the equipment, and training of employees.

- The following personal protective equipment will be provided in each first aid kit. Disposable gloves; disposable CPR masks and antiseptic towelettes, bio-hazard bags and instant sanitizers.

Housekeeping

<u>Waste disposal</u>:

The following are considered regulated wastes which may require special disposal procedures:

- Contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state, compressed items that are caked with dried blood or other potentially infectious materials and can release these materials during handling contaminated sharps (anything that is able to puncture the skin that has blood or bodily fluid on it).

- Pathological or microbiological wastes containing blood or other potentially infectious materials (skin, tissue, or fluids).

Jobsite cleanup**:**

Regardless of the source of the waste, employees will be directed to do the following to isolate the exposure area:

- First, cordon off the area or isolate the equipment to minimize any danger of exposure to others.

- Second, contact the general contractor site safety manager designated on the written site-specific plan for instruction and guidance on proper procedures until he/she can arrange for proper clean-up and disposal.

For supplies used and waste generated on the jobsite, employees will be directed to do the following:

- First, cordon off the area or isolate the equipment to minimize any danger of exposure to others.

- Second, put on protective gloves and goggles and disinfect the equipment/area with diluted household bleach (1:16 dilution = 1 cup of bleach to 1 gallon of water).

- Third, if disposal of waste is necessary, place it in a plastic bag or puncture-proof container to avoid further contamination when disposing in the regular trash container, transfer to emergency medical personnel or an approved disposal site.

    - **DO NOT** dispose of contaminated waste into a garbage bin, refuse bin or similar. This will minimize further exposure to those who have access to those sites.

This Confined Space Policy complies with DOSH regulations and provides information about the dangers related to working in spaces having limited means of egress. No work shall be performed in confined spaces with an IDLH (immediately, dangerous, to life and health).

Policy

No person(s) shall enter a confined space (i.e., any manhole, tank, or vessel) without the approval of the Safety Director, Safety Coordinator or Superintendent, and until all the confined space procedures have been completed. This policy applies to all Hudson Bay Insulation personnel and Contractors/Subcontractors.

Training

All employees involved in confined space activities will be trained to understand the knowledge and skills necessary to safely perform their assigned duties.

Hudson Bay Insulation Company will provide confined space training to employees at the following times:

- When hired, so new employees are aware of confined spaces.
- Before they are assigned permit-required confined space entry duties.
- Before they are assigned alternative method confined space entry duties.
- When their assigned duties change.
- When there is a change in conditions that creates hazards for which they have not been trained.
- Retraining will be conducted when the company has any reason to believe employees are not proficient at their confined space duties, including procedural changes, if they are not following existing procedures and/or if employee's knowledge or use of the company procedures are inadequate.

Employees will be trained on:

- The difference between permit-required and alternative methods confined space.
- Their designated role(s) and responsibilities in the entry procedure(s).
- How to identify and evaluate the hazards associated with permit-required and/or alternative entry method confined spaces.
- Use and maintenance of equipment.
- Rescue procedures (if necessary) and the dangers of attempting an *unauthorized* rescue.

Definitions

- **Alternative methods -** Permit-required confined space using alternative methods. An alternative process for entering a permit space under very specific conditions outlined in the Alternative Methods section of this chapter. The employer must complete documentation as required per the Alternative Methods section of this chapter to communicate to the workers the space conditions. That documentation includes: the location of the space, the date of entry, the duration of the entry, the hazards of the space and the work, the specific measures used to eliminate the hazards, the ventilation system used to control the atmospheric hazards, all conditions required to evacuate the space and the name, title, and signature of the entry supervisor.

- **Calibration** - Checking a direct reading instrument against an accurate standard such as a calibration gas to determine deviation and correct for analytical errors.

- **Confined Space** – A space that is the following:

    - Large enough and arranged so an employee could fully enter the space and work.

    - Has limited or restricted entry or exit. Examples of spaces with limited or restricted entry are tanks, vessels, silos, storage bins, hoppers, vaults, excavations, and pits.

    - Not primarily designed for continuous human occupancy.

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

- **Enter (entry) -** The action where any part of a person's body breaks the plane (passes through an opening) into a confined space. Entry occurs as soon as any part of the entrant's body breaks the plane of the opening into the space whether such action is intentional, or any work activities are actually performed in the space. *Note: When the opening is large enough for the worker to fully enter the space, a permit is required even for partial body entry. Permits are not required for partial body entry, where the opening is not large enough for full entry.*

- **Entry permit (permit) -** The written or printed document that is provided by Hudson Bay Insulation Company to allow and control entry into a permit-required and/or alternative method confined space.

- **Hazardous atmosphere -** An atmosphere that may expose employees to the risk of death, incapacitation, impair their ability to self-rescue (escape unaided from a permit-required confined space), injury, or acute illness

- caused by one or more of the following:
    - Flammable gas, vapor, or mist more than ten percent of its lower flammable limit (LFL) or lower explosive limit (LEL).
    - Airborne combustible dust at a concentration that meets or exceeds its LFL. The concentration may be approximated as a condition in which the dust obscures vision at five feet (1.52 m) or less.
    - Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent.
    - Atmospheric concentration of any substance which may exceed a permissible exposure limit. (PEL).
    - Any other atmospheric condition that is immediately dangerous to life or health.

- **Limited or restricted means of entry or exit -** A condition that has a potential to impede an employee's movement into or out of a confined space. A space has limited or restricted means of entry or exit, if an entrant's ability to escape in an emergency would be hindered. Examples include, but are not limited to, trip hazards, poor illumination, slippery floors, inclining surfaces and ladders.

- **Lower flammable limit (LFL) or lower explosive limit (LEL)** - The minimum concentration of a substance in air needed for an ignition source to cause a flame or explosion.

- **Monitor or monitoring (see also testing) -** The process used to identify and evaluate a potential hazardous atmosphere after an authorized entrant enters the space. This process checks for atmospheric changes. It is performed in a periodic or continuous manner after the completion of the initial testing or evaluation of that space.

- **Non-entry rescue -** Retrieval of an entrant from a permit-required space without entering the permit space.

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

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

- **Permit-required confined space or permit space.** - A confined space that has one or more of the following characteristics capable of causing death or

- serious physical harm:
    - Contains or has a potential to contain a hazardous atmosphere;
    - Contains a material with the potential for engulfing someone who enters;
    - Has an internal configuration that could allow someone entering to be trapped or asphyxiated by inwardly converging walls or by a floor, which slopes downward and tapers to a smaller cross section;
    - Contains any physical hazard. This includes any recognized health or safety hazards including engulfment in solid or liquid material, electrical shock, or moving parts;
    - Contains any other recognized serious safety or health hazard that could either:
        - Impair the ability to self-rescue; or
        - Result in a situation that presents an immediate danger to life or health.

- **Physical hazards -** An existing or potential hazard that can cause death or serious physical damage. Examples include, but are not limited to: Explosives; mechanical, electrical, hydraulic, and pneumatic energy; radiation; temperature extremes; engulfment; noise; and inwardly converging surfaces. Physical hazards also include chemicals that can cause death or serious physical damage through skin or eye contact (rather than through inhalation).

- **Potential hazards** - All reasonable anticipated conditions within a space and outside the space that can adversely affect the conditions within the space.

- **Rescue -** Retrieving and providing medical assistance to one or more employees in a permit space.

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

- **Testing (see also monitoring) -** The process of identifying and evaluating the hazards that entrants may be exposed to in a permit-required confined space. Testing includes specifying the initial atmospheric tests that are to be performed in the permit-required confined space.

- **Ventilate or ventilation** - The process of controlling a hazardous atmosphere using continuous forced-air mechanical systems.

- Ventilation is a method of hazard control, not hazard elimination.

Roles and Responsibilities

- **Program Administrator -** The person who has overall responsibility for your confined space program and has sufficient training or experience with permit-required confined space entry to oversee program development, coordinate implementation, and conduct required evaluations of program effectiveness.

- **Competent person -** A person capable of identifying existing and predictable hazards in the surroundings or working conditions including those that are unsanitary, hazardous, or dangerous to employees, and has the authorization to take prompt corrective measures to eliminate them. They must be knowledgeable on the information contained in this chapter.

- **Qualified person -** A person who has successfully demonstrated the ability to solve problems relating to the subject matter, work, or project, either by: Possession of recognized degree, certificate, professional standing; or extensive knowledge, training, and experience.

- **Entry supervisor -** The qualified and trained person is responsible for identifying permit-required confined spaces and performing responsibilities and job duties as outlined in this section. For example:

    - Determining if acceptable entry conditions are present at a permit-required confined space where entry is planned;

    - Authorizing entry and overseeing entry operations; and

    - Terminating entry as required by this standard.

  Note: An entry supervisor also may serve as an attendant or as an entrant if that person is trained and equipped as required by this chapter for each role he or she fills. The duties of entry supervisor may be passed from one individual to another during an entry operation.

- **Entrant -** An employee who is authorized by Hudson Bay Insulation to enter a permit-required confined space.

- **Attendant -** An individual stationed outside one or more permit-required confined spaces to monitor the entrants. The attendant must understand the hazards that may be faced during entry, including the mode, signs or symptoms, and results of exposure to the hazards. They must also be aware of the behavioral effects of exposure to the hazards. An Attendant must continuously maintain an accurate count of entrants in the space. Maintain an accurate record of who is in the permit-required confined space.

- Communicate with entrants as necessary to monitor their status or alert them of the need to evacuate the space. Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space. Order entrants to evacuate the space immediately if any of the following conditions occur: a prohibited condition, the behavioral effects of hazardous exposure are observed in an entrant, a situation outside the space that could endanger entrants, and/or if the attendant cannot effectively and safely perform all the duties required in this chapter.

  The attendant must take the following actions when unauthorized persons approach or enter a space:

  - Warn unauthorized persons to stay away from the space, tell the unauthorized persons to exit immediately if they have entered the space,
  - Inform entrants and the entry supervisor if unauthorized persons have entered the space.
  - They will also perform non-entry rescues as specified by the rescue procedure(s), have the means to respond to an emergency affecting one or more of the permit spaces being monitored without preventing performance of the attendant's duties to the other spaces being monitored.
  - The attendant also carries out no duties that might interfere with their primary duty to monitor and protect the entrants, calls for rescue and other emergency services as soon as entrants may need assistance to escape from the space and monitors entry operations until relieved by another attendant or all entrants are out of the space

- **Host employer -** The employer that owns or manages the property where the work is taking place. In no case will there be more than one host employer.

- **Controlling contractor (employer) -** The employer that has overall responsibility for construction at the worksite. If the controlling contractor (employer) owns or manages the property, then it is both a controlling employer and a host employer.

Rescue

- The personnel designated to rescue employees from permit-required confined spaces. You must make sure you have adequate rescue and emergency services available during your permit-required confined space entry operations. You must evaluate and select rescue teams or services who can:

- Respond to a rescue call in a timely manner. Timeliness is based on the identified hazards. Rescuers must have the capability to reach potential victims within an appropriate time frame based on the identified permit space hazards. Proficiently rescue employees from a permit-required confined space in your workplace. Rescuers must have the appropriate equipment for the type of rescue. Agree to notify you immediately if the rescue service becomes unavailable.

- Make sure that at least one member of the rescue team or service holds a current certification in first aid and cardiopulmonary resuscitation (CPR).

- Inform each rescue team or service about the hazards they may confront when called to perform rescue.

- Provide the rescue team or service with access to all permit spaces from which rescue may be necessary. This will allow them to develop appropriate rescue plans and to practice rescue operations.

Employees who assigned to provide permit-required confined space rescue and emergency services, shall be provided with:

- Personal protective equipment (PPE) needed for safe entry.

- Other equipment required to conduct rescues safely.

- Training so they are: Proficient in the use of the PPE and other equipment. Proficient as an entrant of permit-required confined spaces. Able to safely perform assigned rescue and emergency duties. Knowledgeable in basic first aid and cardiopulmonary resuscitation (CPR).

- Practice sessions for permit-required confined space rescues at least once every 12 months where dummies, manikins, or actual persons are removed from either: The actual permit spaces; or representative permit spaces that simulate the opening size, configuration, and accessibility, of permit spaces where rescue will be performed.

- You must establish procedures for: Contacting rescue and emergency services. Rescuing entrants from permit-required confined spaces. Providing necessary emergency services to rescue entrants. Preventing unauthorized persons from attempting a rescue.

Non-Entry Rescue Systems

- Hudson Bay Insulation will use non-entry retrieval systems or methods to rescue entrants in a permit required confined space unless this: Would increase the overall risk of injury to entrants; or would not contribute to the rescue of the entrant.

- Hudson Bay Insulation will make sure each entrant uses a chest or full-body harness, with a retrieval line attached to the harness at one of the following locations:
    - At the center of the employee's back, near shoulder level.
    - Above the employee's head.
    - At another point which presents a profile small enough for the successful removal of the employee.

- You must attach the retrieval line to a mechanical device or fixed point outside the space, so rescue can begin as soon as necessary. You must make sure a mechanical device is available to retrieve entrants from vertical spaces more than 5 feet deep.

Note: When you can demonstrate that the use of a chest or full-body harness is not feasible or creates a greater hazard, then you may use wristlets, or another method shown to be the safest and most effective alternative.

Procedure

The Hudson Bay Insulation Foreman will identify all permit-required and/or alternative method confined spaces. That Foreman will assist with identification and determination of confined spaces.

- Identify the type of confined space (permit-required and/or alternative methods).
- Verify that all employees involved in the confined space operation have been properly trained on their roles, how to identify, evaluate and eliminate hazards (potential and/or real hazards), use and maintenance of equipment, methods used to test and monitor the atmosphere within the space, how to prevent unauthorized entry, and rescue procedures.
- Complete the Confined Space Entry Permit Form and document if entry is permit-required and/or alternative methods on the form.
- Evaluate the actual and potential hazards of each confined space.
- Document actual and potential hazards on the Confined Space Entry Permit. This information must be made available to employees. Allow entrants and/or their representatives the opportunity to observe any monitoring or

- testing, or any actions to eliminate or control hazards. For permit-required confined spaces the affected employees must be informed about the existence, location, and danger in the workplace by: Posting danger signs or using any other equally effective means to inform employees.

- Utilize physical barricades, guardrails, signage, covers, etc. to prevent unauthorized employees from entering permit-required and/or alternative methods confined spaces.

Entry Requirements for Permit-Required Entry

1. Obtain a Confined Space Entry Permit Form and the proper equipment to test and ventilate the confined space for oxygen, combustible gases and vapors and toxic gases and vapors from the Program Administrator or Entry Supervisor.

2. Complete the Confined Space Entry Permit Form and mark the box for permit-required confined space.

3. Post the Confined Space Entry permit at the entry of the location or by any other equally effective means. Permit-Required Entry Permits must be kept for at least one year. You must keep permit-required entry permits that show the actual atmosphere an employee entered or worked in, as employee exposure records per WAC 296-802.

4. The permit must be filled out completely and signed by the entry supervisor, the entrant(s) and the attendant.

5. Implement all measures necessary to prevent unauthorized entry into permit-required confined spaces.

6. Test for atmospheric hazards, in this order: Oxygen, combustible gases and vapors, toxic gases and vapors. Allow each entrant or their authorized representative an opportunity to observe the testing. This includes pre-entry and subsequent/continual monitoring of the permit-required confined spaces. Testing must be done before entry and during entry.

7. Ventilation shall always be maintained when employees are working in permit-required confined spaces.

8. Provide adequate rescue and emergency services during permit-required confined space entry operations. The following is not considered adequate rescue and emergency services: Planning to rely on a rescue service and posting a contact number (like 911) without contacting them to verify that they can provide adequate rescue services.

9. If rescue services aren't available, the program administrator or the entry supervisor will be responsible for determining if the contractor will provide a rescue team or if non-entry rescue methods will be used.

10. An attendant shall be stationed outside the permit-required confined space. The attendant must meet the requirements established in the Roles and Responsibilities section of this chapter. They must also continuously maintain an accurate count of entrant(s) in the space. The attendant will also maintain communication with the entrant(s) as necessary to monitor their status or alert them of the need to evacuate the permit-required confined space. The attendant will perform non-entry rescues as specified in the rescue procedure and has the means to call for rescue and other emergency services as soon as entrant(s) may need assistance to escape from the permit-required confined space. The attendant can terminate and order entrant(s) to exit the permit-required confined space at any time during the entry.

11. When entry operations are complete, including securing an entrance cover, the Confined Space Entry Permit can be cancelled, and the entry terminated.

Entry Requirements for Alternative-Methods Entry

1. Obtain a Confined Space Entry Permit Form and the proper equipment to test and ventilate the confined space for oxygen, combustible gases and vapors and toxic gases and vapors from the Program Administrator or Entry Supervisor.

2. Complete the Confined Space Entry Permit Form and mark the box for alternative methods confined space.

3. Implement all measures necessary to prevent unauthorized entry into permit-required confined spaces.

4. Test for atmospheric hazards, in this order: Oxygen, combustible gases and vapors, toxic gases and vapors. Allow each entrant or their authorized representative an opportunity to observe the testing. This includes pre-entry and subsequent/continual monitoring of the permit-required confined spaces. Testing must be done before entry and during entry.

5. Ventilation shall always be maintained when employees are working in alternative methods confined spaces.

6. Evacuate employees from the space immediately when any of the following occurs:

    a. Detection of a hazardous atmosphere by air-monitoring instruments,

    b. failure of air-monitoring instruments,

    c. failure of ventilation systems and/or if there is an introduction of a hazard,

    d. a hazard develops, or conditions change within the alternative methods confined space.

Note: If an alternative method confined space is evacuated it cannot be re-entered as alternative methods confined space unless the conditions that caused the evacuation are corrected, and you must treat any re-entry as a new entry.

To maintain a work environment free of injury or illness, Hudson Bay Insulation requires all employees to adhere to its Safety Requirements. Employees found to be in non-compliance with the safety policies and procedures of HBI will be counseled and/or corrective action taken up to and including termination.

It is our intention to give those engaged in detrimental practices warning and allow adequate time to correct situations that may arise, however, in some circumstances it may be necessary to terminate an employee without warning for activities seriously detrimental to the Company or where management's confidence in the integrity or future performance of the employee is lacking.

HBIC has implemented rigid corrective actions for those who commit unsafe acts or practices that are considered Immediately Dangerous to Life and Health (IDLH).

IDLH safety violations may include, but are not limited to:

- Failure to follow fall protection requirements.
- Failure to use ladders correctly.
- Failure to use MEWPs correctly.
- Removing safety features from equipment and tools.
- Failure to follow lock-out/tag-out procedures.
- Failure to follow confined space procedures.

Violating these safe work policies and procedures will result in immediate actions.

- **1st Violation – 5-day suspension.**
- **2nd Violation of the same item within 3-year period – termination.**
-

HBIC reserves the right to terminate employment of an offending employee at any time depending on the nature and severity of the offense.

Each violation will be explained and documented in detail to the employee in the presence of a witness. All possible steps will be taken to ensure the employee understands company policies and procedures. A notice of the violation will be documented in the employee's permanent file and a copy provided to the safety department.

The superintendent or a safety representative will thoroughly explain the violation and assist the employee in any way possible, to include retraining, to prevent a reoccurrence of the violation.

Sub-Tier Subcontractors:
Sub-Tier Subcontractors to Hudson Bay Insulation shall adhere to HBI Safety Requirements. Non-compliance with the safety policies and procedures of HBI will result in a written warning and appropriate correction action and if necessary immediate restriction from the jobsite until conditions are corrected.

Subcontractors shall submit a written report to HBI's safety department of all incidents/accidents including near misses within 2 hours of the occurrence. Subcontractors shall submit, in writing, all weekly safety meeting minutes/toolbox talks for the duration of which they are on the jobsite, or as directed by the Project Master Contract.

All electrical equipment must be inspected prior to use, identify any hazards, and ensure that it has the proper certification from a recognized agency such as UL.

Maintain and use all guards, inspect flexible cords and cables to ensure proper insulation and grounding is in place to prevent electric shock.

Never work on or around energized parts or equipment.

If work is required in these areas follow the proper procedures to de-energize all the exposed electrical components including the use of our Lock Out Tag Out Program.

Verification that all exposed electrical components and equipment have been de-energized shall be completed before proceeding with work. Always treat these components and equipment as if it is a live circuit.

All employees need proper training prior to working around potential electrical hazards. This training will be provided by or facilitated by the Safety Director. Thereafter refresher training or retraining will be provided as needed.

All Work required on energized parts of equipment will be subcontracted to licensed qualified contractors. Shields, guards, or barriers are to be installed by a qualified licensed contractor and used when working in enclosed or confined spaces with electrical hazards.

Ensure a safe distance of 10 feet from exposed overhead energized lines or cables is maintained for all personnel, equipment, and vehicles. Use of visual markers may be used to help maintain the safe work zone.

Do not enter or work in the areas that are or become inadequately illuminated where electrical hazards could exist.

Only non-conductive ladders are to be used on Hudson Bay Insulation Company projects.

Voltage (nominal, kV alternating current	Minimum Clearance Distances in Feet
up to 50	10
over 50 to 200	15
over 200 to 350	20
over 350 to 500	25
over 500 to 750	35
over 750 to 1,000	45
over 1,000	Established by utility owner or registered PE

A copy of the jobsite specific Emergency Plan shall be available at every jobsite.

In the event of a serious injury or accident, immediately call 911 or the appropriate number.

Emergency Procedures:

An emergency is any situation that poses an immediate threat to life and property. Some examples are Fire, floods, windstorms, explosions, serious injuries, collapse of equipment or structures, toxic fumes. Hudson Bay Insulation Company shall notify the General Contractor/Customer of any emergency situations arising at the job site.
Superintendents and jobsite foremen shall direct all HBI personnel during unforeseen emergencies. These responsibilities are very important since the loss of life, jobs and extensive damage may result unless employees react quickly and effectively.

In the event of a serious injury which requires outside medical assistance, employees will follow these procedures:

- Dial emergency services – 911 or appropriate number– to request medical assistance.
- Contact the HBIC jobsite supervisor and appropriate jobsite safety personnel.
- Ensure that emergency service route is clear and easy to follow, post other employees at entrance sites to aid in the response.
- Contact Chris Jenkins 206-730-6273, Jennifer Moreau 253-514-7019 or Greg Zevely 206-255-1437 immediately following the arrival of medical services.

1) In the event a fire is discovered.

   The first step is to SOUND THE ALARM. The person who discovers the fire is supposed to:

   Give a verbal alarm by shouting **FIRE, FIRE**, and then call **911**. Upon calling the person shall state their name, the company's name, where in the building the fire is located, and the address of the job site.

   After giving the alarm - ***and not before*** - the individual has to make the decision whether to fight the fire. The wisdom of doing so depends on the circumstances. If it does seem feasible to try to extinguish the blaze, the individual should know what equipment is available to him/her and how to use it. It is important that everyone know where fire extinguishers are located.

If the individual discovering the fire can put it out, or get it under control, he or she should do so. One thing every employee should be made aware of is:

No one should try to fight a fire alone. If the fire can be extinguished with a fire extinguisher, employees are encouraged to do so as long as there are two or more people present. If the heat, smoke or exertion weakens the individual, help will be needed fast. The second individual can come to his rescue and perhaps attack the fire with another extinguisher.

2.) Evacuation and Gathering Points

In the event of an emergency, all employees will evacuate the building and gather at the designated rally point. The supervisor or jobsite foreman will conduct a "head count" to ensure that all HBIC employees are accounted for. Once the "head count" is complete, the supervisor or jobsite foreman will report to the Mechanical and/or General Contractor representatives and defer to jobsite specific protocol.

Under **NO** circumstances may any employee leave the site or re-enter the building during an emergency. All HBIC employees must be accounted for and direction given from the Mechanical or General Contractor to leave the site or return to work.

The Supervisor or the Foreman is the designated individual for emergency evacuation operations. All employees must know their recommended evacuation route and an alternative in case the emergency blocks their prime route. They must know the designated assembly area so that head counts can be taken to account for all personnel and receive further instructions from Mechanical or General Contractor.

3.) Cooperation with Emergency Personnel

Hudson Bay Insulation Co. employees will cooperate with emergency personnel in whatever capacity is needed, whether guiding emergency personnel to the fire, or medical personnel to the site where injuries have occurred, by keeping other individuals out of the area, or staying out of their way completely.

After the occurrence of the emergency, Hudson Bay Insulation Company will ensure that all proper incident reports that are required to be submitted to General Contractor/Client, are completed and submitted in the required time.

4.) Communications with media and HBIC employees

If an emergency has occurred, it is important that HBIC employees make no comments to the news media. All communication to the media will be made through a coordinated effort of the management teams of the General Contractor/Client and HBIC.

Hudson Bay Insulation Co. will assign an individual who will be responsible for communication of facts to our employees. Their responsibilities will include contact with the media as well as communication to employees and Clients.

5.) Natural Disaster

In the event of a major catastrophe the General Contractor Management Team is responsible for execution of properly securing safety of project and jobsite personnel. One or some of the steps to be followed are:

a. Call assistance from outside, 911 or appropriate number
b. Stop work.
c. If necessary, call for project site evacuation.
d. Issue instructions to supervisors and employees

6.) Set up security control at the emergency area.

7.) Inclement Weather

Certain precautions and procedures should be followed when inclement weather is imminent. The HBIC Foreman and the Project Management Team shall closely monitor working conditions at the jobsite, evaluating dangers that may exist, be it ice, snow, windstorms, earthquakes, extreme heat, precipitation, or tornadoes.

If for any reason, the weather conditions could result in injury or unsafe working conditions, immediate and appropriate action will be taken, up to and including the stoppage of work. All precautions must be taken to protect the safety of our employees and minimize damage. The HBIC Foreman and the Project Management Team shall try to determine that employees have a safe route home.

The HBIC Foreman and the Project Management Team will implement risk mitigation strategies to reduce employee exposures to temperature extremes. We will utilize the best methods(s) of controlling the employee from exposure. Examples include break schedules, overhead tarps to shield from sun/wind, misters, fans, buddy system monitoring, heaters, scheduling work activities, job rotation etc. to reduce the exposure.

Employees are trained in the following exposure controls.

- Environmental and personal factors that contribute to the risk of heat/cold-related illness.
- Choosing the best clothing/PPE.
- Water consumption – dehydration.
- Acclimatization.
- Common signs and symptoms of heat/cold-related illness.
- How to respond to medical emergencies.

Falls from elevation are a major cause of injuries and death in the construction industry. Hudson Bay Insulation Company is committed to eliminating injuries caused by fall hazards by instituting a program of 100% fall protection for all fall hazards regardless of height.

Definitions

Unprotected sides and edges mean any open side or edge of a floor, roof, balcony/deck, platform, ramp, runway, or walking/working surface where there is no standard guardrail system, or parapet wall of solid strength and construction that is at least thirty-nine inches in vertical height.

Walking/working surface means Any surface, whether horizontal or vertical on which an employee walks, works, or gains access to a work area or workplace location. Walking/working surfaces include, but are not limited to, floors, the ground, roofs, ramps, bridges, runways, stairs, dock boards, formwork, and reinforcing steel but not including ladders.

All employees must comply with the site fall protection policy. Failure to adhere to the fall protection policy may be grounds for immediate termination of the offending employee.

In accordance with WAC 296-880, the following Unified Fall Protection Program is hereby formulated for Hudson Bay Insulation Company for use at all jobsites.

Fall Protection at "0" feet - Open sided floors, walkways, platforms, or runways above or adjacent to dangerous equipment, such as dip tanks and material handling equipment, and similar hazards shall be guarded with a standard guardrail system or other acceptable fall protection systems per WAC 296-880-10010 (1).

Fall protection at "4" feet - Every open sided walking/working surface or platform four feet or more above adjacent floor or ground level shall be guarded by a standard guardrail system, or equivalent, as specified in WAC 296-880-20005. Guarding is not required where there is entrance to a ramp, stairway, or fixed ladder.

Fall protection at "10" feet – Hudson Bay Insulation will ensure that the appropriate fall protection system is provided, installed, and implemented according to the requirements in WAC 296-880-30005 when employees are exposed to fall hazards of ten feet or more to the ground or lower level.

Identify all Fall Hazards

A fall hazard is any occurrence when the distance from the worker's support to the level where a fall would stop exceeds four 4' (feet) while on a walking working surface. When working on a surface that does not meet the walking working surface definition workers are required to use the appropriate fall protection equipment when exposed to a fall of 6' (feet) or greater which is HBI company policy.

Therefore, to comply with WAC 296-880-200, a written description must be made of all fall hazards in each work area. These include the following items and are defined in WAC 296-880-200:

a) Leading Edges
b) Perimeter Edges
c) Elevator Openings
d) Stairway Openings
e) Vent, Mechanical Openings
f) Open-Sided Floors
g) Stairways
h) Aerial Lifts
i) Scaffolds
j) Other

While it is evident that fall protection remediation is the responsibility of the general contractor for items 'a' through 'g' listed above, if methods of fall arrest / restraint are not provided, HBIC must immediately notify the general contractor of the location and deficiency. Also, prior to work commencing in the subject area, these deficiencies must be corrected. For those fall hazards that we generate and work with, generally items 'h' and 'I' above, and any others that are present in the work area when work commences, must be incorporated in the fall protection plan.

Fall Protection Work Plan

All work areas with fall hazards of 10 feet or more will implement a fall protection work plan before any employees begin work. The employees in the specific work area will be trained in the fall hazards and the method used to implement fall protection. The training guide on the next page will be used to train employees in the inspection and maintenance of their fall protection equipment, as well as fall protection selection criteria. All employees will use fall protection when there is exposure to any fall hazard. Employees who fail to follow this policy are subject to disciplinary action, up to and including dismissal.

All fall protection work plans should prepare for any fall protection / fall arrest situation that may arise.

In general, the Fall Protection Work Plan shall contain:

- Identification of all fall hazards in the work area where employees are assigned.
- A description of the method of fall arrest or fall restraint to be provided.
- A description of the correct procedures for the assembly, maintenance, inspection, and disassembly of the fall protection system to be used.
- A description of the correct procedures for handling, storage and security of tools and materials.
- A description of the method of overhead protection for workers who may be in or pass through the area below the work site.
- A description of the method for prompt, safe removal of injured workers.

Prior to permitting employees into areas where fall hazards exist, the employer shall ensure that employees are trained and instructed in all the items above. This training shall be documented by executing the fall protection work plan for their assigned work area(s).

Fall Protective Systems
A fall-protection system refers to equipment designed to control fall hazards. All fall protection systems either *prevent* a fall from occurring or safely *arrest* a fall. Types of fall-protection systems include the following:

Guardrail Systems
Top edge height of guardrail systems shall be 42”, plus or minus 3”.

- Guardrails shall have a mid-rail and toe board.
- Guardrail systems shall be capable of withstanding a 200-pound force in any outward or downward direction.
- Wood top rails and posts shall be at least 2”x4” and posts shall be spaced not more than 8’ on center.
- Wire rope used for a top rail must be at least ¼” diameter and be flagged at not more than 6’ intervals with high-visibility material.
- When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section shall be placed across the access opening when hoisting operations are not taking place.

Safety Monitoring System

- When fall protection systems, including personal fall arrest systems, warning line systems, controlled access zones or guardrail system cannot be implemented, then a safety monitoring system shall be established. The responsible department shall designate a safety monitor to monitor the safety of the workers. Procedures for a safety monitor are outlined in WAC 296-880-40045

Warning Lines Used for Other Than Roofing Work

- Warning lines may be used to mitigate the fall hazards by eliminating exposure.

- When a safe work distance is designated, which may also include some sort of warning line or other barricade, it must be one that eliminates the potential for the worker to stumble and fall over the unprotected edge but at a **minimum 15 feet**.

- There should also be a margin of error included in the distance since there is not a positive means of stopping the worker's forward momentum toward the unprotected edge.

- Factors that might enter into such an evaluation could include weather conditions, lighting, the slope and condition of the walking surface, the kind of work being performed, materials being handled, the height of the worker above the work surface (such as working from a ladder), housekeeping, training, experience, how much time the job takes, or the distance that the worker stays away from any open sides or edges.

- The guiding principle to follow when evaluating warning or barricade lines is that the distance from the unguarded edge of the work surface must be great enough to remove the worker from exposure to a fall hazard.

- Factors to evaluate in determining the allowable use and correct location of barrier lines include such things as the kind of fall hazard present, the work being done and the exposure to the hazard, the pitch of the work surface, whether the deck is secure or not, the degree of slickness of the walking surface, weather conditions and environmental conditions (ice, moss, rain, wind, lighting, sun glare, etc.), what equipment is being used, access and egress protection, training, and supervision.

- Warning lines should be constructed the same as for roofing work.

Safety Net Systems

- Safety Net systems consist of mesh nets, including panels, connectors, and other impact absorbing components.

- If safety nets are needed, the designated competent person will oversee the installation and performance requirements of the system.

Covers

- Floor and roof openings shall be protected by a standard guardrail system or covered. The cover shall be clearly marked "hole" or "cover" and be secured to prevent accidental displacement. Covers shall be capable of supporting at least twice the weight of employees, equipment or material that may be imposed on them at any one time.

- In the instance of discovering a hole or penetration being left uncovered by another trade, immediately stop work and contact the jobsite foreman and/or general contractor.

HBIC personal fall protection consists of two types:

Fall Restraint
Fall restraint prevents an employee access to an open edge or other fall hazard areas like overwater or dangerous equipment. The following items are required in a Fall Restraint System: A full body harness, with back D-ring providing the only allowable lanyard attachment point.

- A rope or lanyard attaching the harness to an anchorage point.
    - The rope or lanyard may only be long enough to allow free movement but not allow the worker access to access the fall hazard area.
- An approved Warning Line shall be used.
    - A warning line system shall be erected along all unprotected edges of the work area that could expose employees to falls of 6' (feet) or greater to the next lowest level.
    - The rope, wire or chain warning line shall be erected not less than 15' (feet) from the edge of an unprotected edge.
    - The rope, wire or chain warning line shall be flagged at no more than 6' (feet) intervals with highly visible materials.

Fall Arrest
Fall Arrest is the combination of approved safety equipment and components used to arrest or stop a free fall. The following items are required for a Fall Arrest System:

- A full body harness, with a back D-ring providing the only allowable lanyard attachment point shall be used.

- An approved shock-absorbing lanyard shall be used for connecting the employee's harness to an approved anchorage point.

- A self-retractable lifeline may also be used in place of a shock absorbing lanyard if attached directly to the harness's back D-ring and **not used with any other type of lanyard.**

    - A self-retractable lifeline shall only attach to the worker's back D-ring found on the back of a full body harness.

    - A self-retractable lifeline may not be used with any other type of lanyard, i.e., daisy chaining them together.

    - All fall protection components that have attachments are required to have a double locking snap-hook.

    - Lanyards **shall not** be wrapped around beams, posts, or be in contact with sharp edged material.
    - Use beam straps with D-rings only.

    - Lanyards and harnesses will be inspected before each use.

- An approved anchorage point shall be used for attaching lanyards.

    - The lanyard shall be attached to anchorage points capable of withstanding 5,000 pounds.

    - Self-retractable lifelines require a 5,000-pound anchorage point.

- Horizontal lifelines may be used for anchorage points for no more than 2 employees at any one time.

    - The cable shall be at least 3/8" (inch) and have the appropriate number approved cable clamps per cable used.

    - 3/8" (inch) cable requires at least two 3/8" (inch) cable clamps.

    - ½" (inch) cable requires at least three ½" (inch) cable clamps.

PROCEDURES
All components of PFAS shall be inspected before usage for damage and serviceability. Refer to manufactures instructions for inspection procedures. Lanyards, Harnesses, Lifelines and Retractable.

Handling, Storage and Securing of Tools and Materials
The handling, storage and securing of tools and materials in and around work areas is of the utmost importance in insuring a safe workplace. Since most of our materials are hauled by labor, many of the sections of WAC 296-880.

However, when transporting material and its storage, the guidelines of the WAC must be followed to the letter.

The securing of tools and materials on elevated work platforms will be as follows:

- Tool belts will be used to carry hand tools to the elevated work surface.
- Tools too large for the tool belt will be raised by rope and pulley.
- When hand tools are used, they will be returned to the tool belt immediately after use.
- Large tools will be secured to the guardrails with the cable provided.
- Insulation material will be raised to a stationary work platform by rope and pulley.
- Moveable elevated work platform will be loaded at ground level. No more material will be kept on the platform than can be secured inside the guardrails one stack high.

Overhead Protection
Overhead protection is required whenever an elevated work platform exists. These requirements will consist of the following elements:

- No one is allowed to work below an elevated platform.
- Warning signs will be posted to limit access to areas under elevated work platforms.
- Hard hats are always required.
- Toeboards will be used on all elevated work platforms.

Rescue Plan

Purpose:
The purpose of this plan is to establish company-wide guidelines for responding to falls from heights. It is intended to reduce risks to an employee's health after a fall arrest event. The rescue plan should also minimize the amount of at-risk behavior of the rescuer during the rescue attempt and help to ensure that the rescue is conducted promptly in a safe and professional manner.

This rescue plan applies to all company locations and divisions where personnel are working at height. The requirements of a rescue plan must be observed by all personnel involved in working at heights. In addition, this rescue plan must be reviewed or included in any job safety analysis or pre-task planning for activities that require working at height.

Rescue considerations:

When personal fall arrest systems are used, the employer must assure that employees can be promptly rescued or can rescue themselves should a fall occur. The availability of rescue personnel, ladders, or other rescue equipment should be evaluated. In some situations, equipment that allows employees to rescue themselves after the fall has been arrested may be desirable, such as devices that have descent capability.

Definitions:

- *Rescue Plan:* A strategy or procedure, planned, to safely retrieve a person who has fallen from an elevated work surface and is suspended in a full body harness. This includes self-rescue or mechanically aided rescue.

- *Self-Rescue:* An act or instance of an employee using their fall protection equipment to rescue themselves.

- *Mechanically Aided Rescue:* A strategy or procedure, planned, to safely retrieve a person who has fallen from an elevated work surface using mechanical means.

- *Suspension Trauma:* A serious medical condition that can lead to unconsciousness, injury, or death, which can occur when a worker is suspended in a harness for too long after a fall.

- *Prompt Rescue:* The recommended goal for rescue subject contact is less than six minutes, per ANSI Z359.2-6.1.

Responsibilities:

Employees

- Must be trained in and familiar with the Hudson Bay Insulation Company Fall Protection Program.

- Must understand and be able to evaluate the risks associated with working at heights.

- Must be trained and competent in the use of fall protection equipment prior to conducting work at heights.

- Must report unsafe conditions or behaviors to their supervisor or the safety department.

- Must be familiar with and understand the company's rescue plan to provide prompt rescue in the event of an arrested fall event.

- *Authorized Rescuer*

- Must be trained in and familiar with the Hudson Bay Insulation Company Fall Protection Program.

- Must be trained in how to inspect, anchor, assemble and use the fall protection and rescue equipment used in locations where employees work.

Rescue Procedures:
Under 29 Code of Federal Regulations OSHA CFR 1926.502 (d), it requires that employers provide for "prompt rescue of employees in the event of a fall or shall assure that employees are able to rescue themselves." The rescue procedure should address the potential of suspension trauma and how the rescued worker will be handled to avoid any post-rescue injuries.

Rescue procedures should include:

- Employee training on how to "pump" his/her legs frequently to activate the muscles and reduce the risk of venous pooling as well as how to use footholds to alleviate pressure, delay symptoms and provide support for "muscle pumping."

- Continuous monitoring of the suspended worker for signs and symptoms of suspension trauma.

- Ensuring that a worker receives standard trauma resuscitation once rescued.

- If the worker is unconscious, keep the worker's air passages open and obtaining first aid.

- Monitoring the worker after rescue and ensuring the worker is evaluated by a health-care professional. The worker should be hospitalized if appropriate.

- Possible delayed effects, such as kidney failure, which is not unusual in these cases, are difficult to assess on the scene.

Procedure:
A rescue plan must be a part of the Fall Protection Work Plan for any job that requires work at height. The rescue plan must include consideration of the following rescue types and circumstances:

Self-Rescue
If the person working at heights has properly selected and used his or her fall protection equipment, 90% of workers will be able to perform a self-rescue, which should include these steps:

1. Climbing back up to the level from which he fell (from a few inches to 2-3 feet).
2. Returning to the floor or ground to be evaluated for possible medical attention.

3. Removing all components of fall arrest system impacted by the fall event from service and documenting (bag and tag) the components with name, date, and activity at time of fall and giving the equipment to management.

Assisted Rescue with Mechanically Aided Aerial Lift
Another means of performing a fully Assisted Rescue is to use an aerial lift under the following guidelines:

1. A rescuer will get into the aerial lift and make sure there is a second fall protection device, such as a shock absorbing lanyard or self-retracting lifeline available for the fallen worker.

2. The aerial lift must be maneuvered into position (raised up underneath the fallen worker) so that the rescuer can perform the rescue.

3. Attach the second lanyard or self-retracting lifeline in the aerial lift to the fallen worker.

4. Disconnect the rescued worker from the impacted fall arrest equipment.

5. Lower the worker to the ground and provide medical aid if required.

6. Remove all components of fall arrest system impacted by the fall event from service and document (bag and tag) the components with name, date and activity at time of fall and give the equipment to management.

Normal first aid procedures should be performed as the situation arises. If the area is safe for entry, first aid should be done by a foreman or other certified individual.

<u>Suspension Trauma:</u>
Suspension trauma, also referred to as orthostatic intolerance or harness hang syndrome, is a natural human reaction to being upright and immobile and can be caused by a situation when a person is forced to stay upright without standing. The use of a personal fall arrest system during a fall event can be the cause of this situation.

During a fall event, several things occur that can lead to suspension trauma. Because the worker is suspended in an upright position with their legs hanging, blood begins to accumulate in the legs. This is commonly called venous pooling (the accumulation of too much blood in the veins) which reduces the flow of oxygenated blood to the heart and brain.

Additionally, in a post-fall suspension event, the leg straps on a worker’s safety harness can exert pressure on veins in the legs, compressing them and further reducing blood flow back to the heart.

Under the most ideal circumstances, when a rescue plan is in place, suspension trauma should always be treated as an emergency because, according to the Emergency Medicine Journal, it can become fatal in less than 30 minutes.

Suspension Trauma Warning Signs
It is important to know the warning signs associated with suspension trauma. They include faintness, breathlessness, sweating, paleness, hot flashes, increased heart rate, nausea, dizziness, unusually low heart rate, unusually low blood pressure and loss of vision.

Taking Steps to Reduce the Potential for Suspension Trauma
One of the ways to slow the progression of suspension trauma is to stand up. When standing, the leg muscles must contract to provide support and maintain balance and these actions also put pressure on the veins. This pressure, along with a series of one-way valves in the veins, helps blood get to the heart and reduces the amount of blood pooling in the legs.

A worker can stand in a harness by employing suspension trauma relief straps. Suspension trauma relief straps typically come packaged in two pouches that attach to each side of a harness. During a fall event, the worker can deploy the trauma relief straps - creating a loop that the worker can put his feet into and press against to simulate standing up.

This allows the leg muscles to contract and can relieve pressure from the leg straps to help improve circulation.

Employee Training and Documentation

All employees that are exposed to fall hazards shall be trained in the recognition and minimization of such hazards. Training will be arranged through Hudson Bay Insulation Company. The employee shall be trained and able to demonstrate understanding in the following:

- Nature of fall hazards in the work area.
- When fall protection is required?
- What fall protection is required.
- The correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems.
- The use and operation of fall protection systems, including controlled access zones and guardrail, personal fall arrest and warning lines.
- The limitations of fall protection systems and the use of mechanical equipment during the performance of roofing work on low-slope roofs.
- The correct procedures for equipment and materials handling and storage and the erection of overhead protection.
- The employee's role in fall protection plans.
- The requirements of WAC 296-880.

CERTIFICATION OF TRAINING

The written certification record shall contain the name of the employee trained, the date(s) of the training. Master records will also be kept on file with Hudson Bay Insulation Company.

RETRAINING

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

- Changes in the workplace render previous training obsolete; or
- Changes in the types of fall protection systems or equipment to be used render previous training obsolete; or
- Inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill.

Every Hudson Bay Insulation Company employee is responsible for maintaining high standards of housekeeping and assuming full responsibility for maintaining a safe, hazard free, and healthful work environment as established by applicable fire codes, general safety requirements and as identified in HBIC site specific safety plan. Training is provided, documented, and maintained at company headquarters, on the known potential fire, explosion or toxic release hazards related to work that Hudson Bay Insulation performs and the application of emergency action plans.

To prevent and mitigate the results of catastrophic releases of toxic, reactive, flammable, or explosive chemicals in locations that we work this process safety management practice is used.

All firefighting equipment shall be periodically inspected by the jobsite supervisor and maintained in good operation condition. All defective equipment shall be tagged and immediately removed from service and replaced with serviceable equipment.

Housekeeping

- Remove trash from inside of buildings and away from buildings daily and/or whenever the accumulation of material is sufficient to constitute a fire hazard, whichever is sooner. Avoid accumulation of flammable rubbish and waste materials. Burning of rubbish is prohibited.

- All spills of potentially flammable chemicals will be absorbed with the appropriate absorbent materials as outlined in applicable Material Safety Data sheets. Under no circumstances are wood, sawdust or shavings to be used as an absorbent for spilled flammable liquids or petroleum lubricants.

Refueling of Equipment

- A class B 10 lbs. fire extinguisher shall be within 50 feet of any fueling location.

- Any fuel-powered equipment such as air compressors, hoists, pumps, etc., shall be in a well-ventilated area, exhausting outside the structure and away from combustible materials.

- Fuel-powered equipment are to be fueled outside and clear of structures with engines shut off and allowing enough time prior to refueling for system to cool down.

- Use of electrical or air-driven equipment in the structure is preferred and whenever appropriate ventilation cannot be accomplished.

Heating Devices

- Open flame devices, sources of heat and spark-producing equipment will not be used in areas around flammable materials.

- All open flame devices used in construction work must have a fire watch attendant, unless equipped with combustion safety controls. A 2-A:10-B:C type fire extinguisher shall be located at each site where open flame devices are in use.

- Propane, acetylene, oxygen, and butane tanks will be removed from the buildings, identified as empty and stored in a secured upright position. Oxygen tanks will be stored in a separate area from other flammable compressed gases.

Flammable Liquids

- All flammable liquids, chemical fuels, resins, lubricants, and solvents shall be segregated, labeled, and stored in an approved location with approved spill control and containment facilities. Non-compatible materials will not be stored in the same area.

- Flammable liquid containers shall be kept always covered when not in use.

- Flammable liquids will not be stored in the work area, except for quantities necessary to accomplish the task. All flammable waste will be stored and labeled in an appropriate covered container.

Electrical Equipment

- All electrical equipment shall be inspected in accordance with the assured equipment grounding conductor program as outlined in Hudson Bay Insulation Company's Safety Plan and/or as established on the project.

- Overloading extension cords and electrical receptacles is not permitted.

- All cords and wiring will be protected from mechanical damage by forklifts, man lifts, articulated lifts, etc., by keeping them out of the ingress and egress paths.

Spray Painting, Flammable Resins and Chemicals

- Notify the owner/general contractor prior to the application of flammable coatings or cleaning materials.

- No spray painting or applications of chemicals which may give off flammable vapors are permitted within fifty (50) feet of open flame devices or other possible ignition sources.

- Exhaust fans and/or blowers shall be used to ventilate any areas where hazardous vapors may accumulate.

Ingress and Egress

- Ingress to all construction areas will be coordinated through the general contractor.
- The contractor's Safety Manager and the on-site safety monitor will coordinate the fire prevention plan for the project.
- Ingress and egress routes will be maintained free of all debris for all construction employees throughout all phases of construction.

Emergency phone numbers for the project site shall be prominently displayed by or on the inside lid of the job box.

Hot work permits.
Hudson Bay does not typically need hot work permits for any of its work, however, get authorization from our customer prior to using a pin gun. If required obtain a hot work permit properly documenting all fire prevention and protection requirements have be implemented prior to starting any hot work.

Hudson Bay Insulation Company provides ANSI approved First Aid Kits and supplies on all job sites. Kits should be stored in a job box easily accessible to all employees. Periodically assess to ensure the availability of adequate first aid kit supplies and replenish as needed.

Employees that travel to and from short duration job sites shall have and maintain a first aid kit inside their company vehicle.

In the absence of medical assistance that is reasonably accessible in terms of time and distance to the worksite, a person who has a valid certificate in first aid shall be available to render first aid. Certificate in first aid training will be obtained from the U.S. Bureau of Mines, the American Red Cross, or an equivalent training center. Documentary evidence is maintained in our offices.

When potential exposure to injurious corrosive materials exists, a suitable facility shall be provided for quick drenching or flushing of eyes or body where the eyes or body of any person may be exposed.

Emergency Injury Requirements

When an injury occurs on site:

1. Assess the seriousness of the injury.
2. Stabilize the condition of the injured person as much as you can.
3. Send someone to call for help.
4. Have a runner stationed at the entrance to the site and place other runners at key points along the route to guide emergency medical personnel to the proper location.

When to call for emergency medical assistance:

Conditions that require emergency medical assistance are listed below. Many other kinds of conditions may also require emergency assistance. Emergency medical help is required if the injured person:

1. Is unconscious or disoriented.
2. Is unable to walk or is trapped in machinery or debris.
3. Is bleeding severely from deep cuts or gashes.
4. Has sustained head injuries or crushing injuries.
5. Was injured by contact with electricity.
6. Has a fracture, possible fractures, dislocated joints or possible dislocations.
7. Was injured by chemical releases or accidents.
8. Has experienced a fall.

9. Has a burn other than minor burns, burns on the face, or scalding burns.
10. Has a difficulty breathing or chest pain? Responds with intense or unexpected symptoms following a minor injury.

What HBI can do in an emergency:

Provide first aid, medical services and arrange for emergency transportation for employees with on-the-job injuries or illnesses.

Medical resources available to HBI employees include:

1. Occupational medical clinics are available to all employees on HBI projects for the treatment of occupational injuries and sudden serious illnesses.

2. All foreman and supervisors on HBI projects are certified in first aid and CPR. Other employees on the site may also have these skills. Training is often conducted onsite for interested employees.

Transportation of injured or ill employees:

Non-Emergency
HBI will transport employees with non-emergency injuries to and from the medical facility.

Emergency
Because the efficient and thoughtful handling of seriously injured or ill employees minimizes confusion and offsets negative reactions that can follow a serious accident, it is best to call 911 for emergency services immediately. The 911 unit will arrange for transportation to a medical facility as appropriate.

Injury management:

An employee who has sustained an on-the-job injury or illness may return to work if a release from the attending physician has been obtained. All employees must submit to a drug test.

An employee who is restricted to specific tasks due to casts, braces, or other medical devices, such as crutches, may return to work following the case being reviewed by:

1. The HBI Safety Director
2. The HBI Superintendent
3. The employee's physician

Note: Employees will be returned to work as soon as is medically possible.

Treatment at a non-referred medical facility:

Any employee who obtains outside medical treatment for an alleged on the job injury or illness must report to HBI the injury or illness and the name of the attending physician no later than the first weekday following treatment. Failure to report this information may result in the denial of workers' compensation benefits.

Medical records keeping:

HBI's safety director is responsible for ensuring that the appropriate safety related reports concerning occupational injuries and illnesses are filled out, filed, and maintained. Copies of the following must be immediately forwarded to the safety director.

Reports and OSHA/DOSH forms:

The following reports and records must be filled out, filed, and maintained:

1. Supervisor's Report of Accident is to be completed for all injuries sustained by crafts people requiring a physician's attention. A copy of the completed report is sent to the HBI safety director and Human Resources.

2. Employer's Accident Investigation Report is to be completed by the Safety Director within 2 hours of the incident. The original will be maintained by Human Resources.

3. OSHA 300 Log and Summary of Occupational Injuries and Illnesses will be maintained at Human Resources and posted in the main office.

Accident reporting and investigation:

Each occupational injury or illness that results in treatment by a physician must be thoroughly investigated and monitored. In addition, certain first aid cases as well as non-injury and near miss incidents with a potential for serious injury must also be investigated.

The purpose of accident investigation is to identify contributing causes so future incidents of a similar nature can be prevented. These contributing factors also have a bearing on legal liability issues. Investigations should be directed toward fact finding, not fault finding.

The investigation should begin as soon as possible after the necessary notifications (i.e., Labor and Industries, HBI Safety Director) have been accomplished.

All accident reports are submitted to the project superintendent and forwarded to the HBI Safety Director for investigation.

Concluding the investigation:

At the conclusion of a major accident investigation, a meeting is held to assure that the causes of the accident have been determined and that proper corrective actions have been initiated. Personnel who must attend this meeting include:

1. The HBI Project Manager
2. The HBI Superintendent
3. The HBI Jobsite Foreman
4. The HBI Safety Director

Injury Prevention:

If all the facts involved in an accident are known, it should not be difficult to determine what actions are necessary to prevent injury to other employees with similar duties or exposure to similar conditions. Following prescribed safety protocols will help deter incidents.

Only trained and competent operators are approved by Hudson Bay Insulation Company to operate a powered industrial truck (forklift) as defined in WAC 296-863. This requires that any employee that operates a powered industrial truck (forklift) of any size must first complete a training program.

TRAINING PROGRAM CONTENT – FORKLIFT OPERATORS SHALL RECEIVE INITIAL TRAINING ON THE FOLLOWING TOPICS:

- Operating instructions, warnings, and precautions for the types of forklifts the operator will be authorized to operate.
- Differences between the forklift and the automobile.
- Forklift controls and instrumentation, where they are located, what they do, and how they work.
- Engine or motor operation.
- Steering and maneuvering.
- Visibility (including restrictions due to loading).
- Fork and attachment adaptation, operation, and use limitations.
- Vehicle capacity and how to use the load chart.
- Vehicle stability.
- Any vehicle inspection and maintenance the operator will be required to perform.
- Refueling and/or charging of batteries.
- Operating limitations.
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the type of vehicle the operator is being trained to operate.

Workplace Topics – Site Specific

- Changing surface conditions where the vehicle will be operated.
- Composition of loads to be carried and load stability.
- Load manipulation, stacking, and un-stacking.
- Pedestrian traffic.

- Narrow and restricted areas where the forklift will be operated.
- Ramps and sloped surfaces that could affect the vehicles stability.
- Hazardous locations where the vehicle will be operated.
- Closed environments and other areas where insufficient ventilations could cause the buildup of carbon monoxide or diesel exhaust.
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

Refresher Training
Operator evaluations shall be conducted by persons who possess the knowledge, training, and experience to evaluate operators in their competence. Refresher training may be required if:

- An operator has been observed operating a forklift in an unsafe manner.
- An operator is involved in an accident or near miss incident.
- An operator is assigned to operate a different type or size of forklift or a condition in the workplace changes which could affect the safe operation of the forklift.

Documentation
It is required by law that any operator that is trained and or evaluated in forklift operation be "certified" by documentation of such.

HBIC will ensure trained operators receive a forklift card which includes the following:

- The name of the operator being trained.
- The date the training was conducted.
- The date the operator was evaluated.
- The name and signature of the trainer.

Hudson Bay Insulation Company has established this written Hazard Communication Program to comply with DOSH WAC 296-800 & 296-901, the Hazard Communication Standard.

Both the State of Washington and the Federal Government have laws that establish a worker's right to health information regarding the possible hazards of materials in the workplace. These regulations, commonly referred to as "worker's right-to-know", require that product health and safety information be provided through product labels, Safety Data Sheets (SDS), and education and training of workers. These requirements fall upon the manufacturers, distributors, and end users of such materials.

HBIC employees have instant access to all material and chemical SDS's through the HBIC LMS SDS Library. The SDS library will be updated to include any new hazard information or materials every year.

The written program will be available to all employees and interested parties at our office located at 210 S Hudson St, Suite 375 Seattle, WA 98134. In some cases, this information is also available on individual jobsites. The general contractor has the responsibility of maintaining these records on multi-employer sites.

Informing Contractors
It is the responsibility of the project manager to provide contractors / subcontractors with the following information:

- Hazardous chemicals to which they may be exposed while on the jobsite.
- Precautions the employees may take to lessen the possibility of exposure by using appropriate protective measures.

Hazardous Non-Routine Tasks
Periodically, employees are required to perform hazardous non-routine tasks. Before starting work on such projects, each affected employee will be given information by their supervisor about hazardous chemicals to which they may be exposed during such activity.

This information will include:

- Specific chemical hazards.
- Protective / Safety measures the employee can take.
- Measures the company has taken to lessen the hazards including ventilation, respirators, and presence of another employee and emergency procedures.

Employee Training and Information:
The Company Safety Director is responsible for the employee training program. This person will ensure that all elements specified below are carried out. Prior to starting work, each new employee of HBIC will receive information and training on the following:

- An overview of the state requirements for Hazard Communication, DOSH WAC 296-800 and 296-901 Global Harmonization System.
- Location and availability of Hudson Bay Insulation Company's written hazard program.
- Chemicals present in their workplace operations.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- How to lessen or prevent exposure to these hazardous chemicals through usage of control / work practices and personal protective equipment.
- Emergency procedures to follow if they are exposed to these chemicals.
- Location of SDS file and location of hazardous chemical list.

Each new employee will review and sign Hudson Bay's policy and written material on Hazard Communication including GHS materials. The Safety Director is responsible for ensuring that safety data sheets SDS on any new chemical(s) are made available. Training for existing employees occurred prior to June 2014.

Container Labeling:
Warehouse (shipping / receiving) personnel will verify that all containers delivered to our jobsites will:

- Be clearly labeled as to the contents.
- Have appropriate hazard warning, labels and ensure labels are not removed or defaced.
- Labels will comply with the Global Harmonized System using pictograms and hazard warning words.
- List the name and address of the manufacturer.

Safety Data Sheets (SDS):
The Safety Director, is responsible for monitoring the SDS system for the company. This person will review incoming data sheets for new and significant health / safety information and will see that any new information is passed on to the affected employees. Copies of SDS's for all hazardous chemicals to which employees of this company may be exposed will be kept at the office located at 210 S Hudson St Suite 375, Seattle, WA 98134. Copies are also available through the HBIC LMS.

Hudson Bay Insulation Company has established the Hearing Conservation Program to provide protection from noise-induced hearing loss for those employees who may be assigned to work in areas having an eight (8) hour time weighted average (TWA) noise level which may exceed the DOSH permissible exposure level (PEL) of 85 dBs. Employee participation in this program is mandatory.

Audio Metric Testing:
Baseline audio grams may be obtained for each employee who will be assigned to a shop or area where noise levels may exceed the DOSH PELs of 85 dBs TWA and an annual audio metric test will be obtained for each employee thereafter for comparison with the baseline audio gram. The results of all audio metric testing will be made known to the employee or his/her representative. Any employee who demonstrates a Standard Threshold Shift or for whom a medical referral has been recommended will be required to follow the procedures listed below:

- Required to always use hearing protection on company premises.
- Employees who demonstrate an STS will be refitted and retrained in the use of protectors and provided with hearing protectors offering greater attenuation if necessary.
- The employee will be informed in writing within twenty-one (21) days of the existence of an STS.
- The employee will be referred for an audio logical evaluation, if additional testing is considered necessary by the testing entity.
- Employees will be referred, at no cost to the employee, for an ontological evaluation if the testing entity observes a medical pathology of the ear, which is aggravated by the wearing of hearing protectors.
- The employee will be informed of the need of an ontological examination if a medical pathology of the ear unrelated to the use of hearing protectors is suspected by the testing entity.
- Employees with a confirmed STS will be recorded on the OSHA Form 300. Note: A confirmed STS exists when the annual audiogram shows an employee has suffered an STS and Hudson Bay Insulation obtains a retest within thirty (30) days which indicates the shift is persistent.
- If Hudson Bay Insulation does not retest within thirty (30) days, then it is presumed the employee has had an STS.

Noise Monitoring
The Safety Director will conduct monitoring of all production areas, by individual or representative noise exposure measurements, to ensure that those areas where noise levels exceeding DOSH permissible exposure levels are identified, and warning signs are posted if required. The noise monitoring shall be conducted and documented whenever there is a substantial change in equipment, area use, or work practices that may generate additional noise.

Training

The Safety Director will conduct the training of all employees, either personally or through a qualified training entity, who may be exposed to noise levels above the DOSH permissible exposure level of 85 dBs TWA. All training records will be kept on file at the corporate office.

The training will be repeated on an annual basis and shall insure that an exposed employee understands:

- The effects of noise on hearing.
- The purpose of hearing protectors: the advantages, disadvantages, and attenuation of various types of protectors and instructions as to the selection, fitting, use and care.
- The purpose of audio metric testing and an explanation of the test procedures and results.
- Their right to access their records and to a copy of the appropriate Hearing Conservation Standard.
- Which production areas of Hudson Bay Insulation were monitored and found to have noise levels above the DOSH permissible exposure levels.

The purpose of this policy is to provide a safe and healthful working environment and protect Hudson Bay Insulation Company employees who are exposed to temperature extremes, radiant heat, humidity, or limited air movement, from heat related illnesses and ensure compliance with the Outdoor Heat Exposure rule, WAC 296-62-095.

The requirements apply to anyone working outdoors more than 15 minutes in any 60-minute period from May 1 through September 30 and only when employees are exposed to outdoor heat at or above the applicable temperature table listed below.

Outdoor Temperature Action Levels

All other clothing	89 degrees
Double-layer woven clothes including coveralls, jackets, and sweatshirts	77 degrees
Non-breathing clothes including vapor barrier clothing or PPE such as chemical resistant suits	52 degrees

Definitions

Acclimatization - The body's temporary adaptation to work in heat that occurs as a person is exposed to it over time.

Double-layer woven clothing - Clothing worn in two layers allowing air to reach the skin. For example, coveralls worn on top of regular work clothes.

Drinking water - Potable water that is suitable to drink and suitably cool in temperature. Drinking water packaged as a consumer product and electrolyte-replenishing beverages (i.e., sports drinks) that do not contain caffeine are acceptable.

Environmental risk factors for heat illness - means working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees. These conditions will be considered when determining that Hudson Bay Insulation Company is implementing controls and methods to reduce the potential for heat related illness.

Heat-related Illness - means a serious medical condition resulting from the body’s inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

Heat cramps - painful spasms of the muscles, are caused when workers drink large quantities of water but fail to replace their bodies' salt loss. Tired muscles -- those used for performing the work -- are usually the ones most susceptible to cramps. Cramps may occur during or after working hours and may be relieved by

taking liquids by mouth or saline solutions intravenously for quicker relief, if medically determined to be required.

Heat exhaustion - results from loss of fluid through sweating when a worker has failed to drink enough fluids or take in enough salt or both. The worker with heat exhaustion still sweats but experiences extreme weakness or fatigue, giddiness, nausea, or headache. The skin is clammy and moist, the complexion pale or flushed, and the body temperature normal or slightly higher.

Heat stroke - a condition marked by fever and often by unconsciousness, caused by failure of the body's temperature-regulating mechanism when exposed to excessively high temperatures.

Heat rash - also known as prickly heat, may occur in hot and humid environments where sweat is not easily removed from the surface of the skin by evaporation. When extensive or complicated by infection, heat rash can be so uncomfortable that it inhibits sleep and impedes a worker's performance or even results in temporary total disability. It can be prevented by resting in a cool place
and allowing the skin to dry.

Outdoor environment - An environment where work activities are conducted outside. Work environments such as inside vehicle cabs, sheds, and tents or other structures may be considered an outdoor environment if the environmental factors affecting temperature are not managed by engineering controls. Construction activity is work in an indoor environment when performed inside a structure after the outside walls and roof are erected.

Personal risk factors for heat illness - means factors such as an individual’s age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body’s water retention or other physiological responses to heat.

Shade - A blockage of direct sunlight. One indicator that blockage is sufficient is when objects do not cast a shadow in blocked sunlight. Shade is not adequate when heat in shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning. Shade may be provided by any natural or artificial means that does not expose employees to unsafe or unhealthy conditions and that does not deter or discourage access or use.

Policy

Each workplace is evaluated to determine if Hudson Bay Insulation Company employees are at risk from heat related illnesses during temperature extremes and hot weather while working. If it is determined that employees are at risk, they will be trained to be aware of heat related illnesses, how to prevent heat related illnesses, the symptoms of heat related illnesses, and procedures to take if symptoms are present.

Hudson Bay Insulation Company will implement this Heat Stress Program when employees are at risk of heat related illnesses while they are working and are exposed to a combination of environmental risk factors such as temperature extremes, radiant heat, humidity, limited air movement, protective clothing, workload severity and duration.

Extreme High Heat Procedures

When temperatures are at or exceed 100 degrees Fahrenheit the following procedures will be put into action.

- HBI foreman shall coordinate to always have one or more areas with shade while employees are present that are either open to the air or provided with ventilation or cooling, and not adjoining a radiant heat source such as machinery or a concrete structure. The amount of shade present shall be at least enough to accommodate the number of employees on a meal or rest period. The shade shall be located as close as practicable to the areas where employees are working.

- HBI Foreman will ensure that employees take preventative cooldown rest periods of at least ten minutes every two hours. The preventative cool-down rest period required may be provided concurrently with any meal or rest period required under WAC 296-126-092 and will be paid unless taken during a meal period.

Training

Each year prior to the month of May, all employees that are exposed to outdoor heat at or above those listed in Table 1, will be provided training on signs and symptoms of outdoor heat exposure and on company policies to prevent heat-related illness.

Employee training: Training in the following topics will be provided to all supervisory and non-supervisory employees:

- Environmental and personal risk factors for heat illness.

- Procedures for identifying, evaluating, and controlling exposures to the environmental and personal risk factors for heat illness.

- The importance of frequent consumption of water.

- The importance of acclimatization.

- The different types of heat illness and the common signs and symptoms of heat illness.

- The importance of immediately reporting to the employer or designee symptoms or signs of heat illness.

- Procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary.

- Procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by medical service personnel.

- How to provide clear and precise directions to the work site.

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

- The information provided for employee training.

- Procedures the supervisor will follow to implement controls as determined by the employer.

- Procedures the supervisor will follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

Controls for reducing heat exposure

Hudson Bay Insulation Company will reduce the potential for heat stress to occur. This could be a work/rest regimen, starting jobs earlier and ending earlier to avoid the hot times of the day, provisions for gaining access to shade, identifying the onset of heat related symptoms and the methods used to cool an employee off, etc.)

Provisions for water

On days when the temperature is at or above those listed in table listed above, employees will be provided enough drinking water which is readily accessible at their work location. The water quantity will be sufficient to allow each employee to drink at least a quart or more of water each hour.

First Aid awareness and actions in the event of a heat related illness:

The following chart helps employees recognize the main types of heat related illnesses, symptoms, and the appropriate treatment to reduce the effects of heat related illness.

First Aid awareness and actions in the event of a heat related illness:

	Symptoms	Treatment
Heat cramps	• muscle spasms in legs or abdomen	• move person to a cooler location. • stretch muscles for cramps. • give cool water or electrolyte-containing fluid to drink
Heat Exhaustion	• headaches • clumsiness • dizziness/lightheadedness/fainting • weakness/exhaustion • heavy sweating/clammy/moist skin • irritability/confusion • nausea/vomiting • paleness	• move person to a cooler place (do not leave alone) • loosen and remove heavy clothing that restricts evaporative cooling. • If conscious, provide small amounts of cool water to drink. • fan person, spray with cool water, or apply a wet cloth to skin to increase evaporative cooling. • call 911 if not feeling better within a few minutes
Heat stroke	• sweating may or may not be present. • red or flushed, hot dry skin. • bizarre behavior • mental confusion or losing consciousness. • panting/rapid breathing • rapid, weak pulse • seizures or fits.	• call 911 • move person to a cooler place (do not leave alone) • cool worker rapidly • loosen and remove heavy clothing that restricts evaporative cooling. • fan person, spray with cool water, or apply a wet cloth to skin to increase evaporative cooling

Housekeeping

Each Hudson Bay Insulation Company employee shall conform to the guidelines as dictated in WAC 296-155-020. These guidelines being:

- All places of employment shall be kept clean to the extent that the nature of the work allows.
- To facilitate cleaning, every floor, working surface and passageway shall be kept free from protruding nails, splinters, loose boards, or openings.
- Cleaning and sweeping shall be performed in such a manner as to minimize the contamination of the air with dust.
- In areas where workers may pass or perform duties, all debris and accumulations of material shall be removed. Hoses and electrical conductors across aisles or passageways shall be covered or suspended overhead so that there is no tripping hazard.
- Where mechanical handling equipment is used, sufficient safe clearances shall be allowed for aisles, at loading docks, through doorways and wherever turns or passages must be made. Such aisles and passageways shall be marked.
- Storage of material shall not create a hazard. Bags, containers, bundles, construction materials and other equipment shall be stored in tiers, stacked, blocked, or interlocked. They shall be limited in height so that they are stable and secure against falling, sliding or collapse.
- Free access shall always be maintained to all exits, fire alarm boxes, fire extinguishing equipment, and any other emergency equipment. Free access means clearing of all obstructions.
- Working and storage areas shall be kept free from accumulation of materials that pose hazards of tripping, fire, explosion, or pest harborage. Vegetation control shall be exercised.
- All lunchrooms, washrooms and restrooms shall be kept in a clean and sanitary condition. Garbage cans in lunchrooms and restrooms shall be equipped with fitted covers and the contents disposed of daily.
- During construction, alteration, repair or demolition of buildings and structures, employers shall ensure continuous clean-up of their work area, including removal of all rubble, scrap, boxes, crates and excess material to trash disposal areas.
- Containers shall be provided for the collection and separation of waste, trash, oily or used rags and other refuse. Containers used for garbage and other oily, flammable, or hazardous wastes, such as caustics, acids, harmful dusts or similar materials shall be equipped with covers. Common garbage and other waste shall be disposed of at frequent and regular intervals. Chemical agents or substances that might react to create a hazardous condition shall be stored and disposed of separately. All hazardous waste that are subject to the requirements of chapter 173-303 WAC shall be handled accumulated and disposed of in accordance with that chapter.
- All floors and walkways shall be maintained in good condition. Loose or broken components shall be repaired or replaced. Secure footing shall be ensured on all floors and walkways. (Statutory Authority: RCW 49.17.040 & 49.17.050. 86-03-074 [Order 86-14] 296-155-020, filed 1/21/86; [Order 74-26] 296-155-020, filed 5/7/74, effective 6/6/74.)

Mobile Elevated Work Platforms (MEWPS)

Employees are required by law WAC 296-155-105 (5) to make a report of each industrial injury or occupational illness, regardless of the degree of severity, immediately to their supervisor when any of the following occurs:

- Injury to employees, other trades, or the public.
- Any exposure to blood or bodily fluids that might have occurred.
- Property damage, fire or any other event involving potential liability which may lead to claims against Hudson Bay Insulation Company.
- Any near miss incidents.

An Employee Accident/Incident Report and a Supervisor Accident/incident Report must be completed; including when a visit to a doctor's office is not involved. In the event of a non-injury occurrence, the supervisor will complete a Supervisor Accident/Incident Report. Make sure that you get the names of any witnesses and their address if applicable.

These procedures will take place within 2 hours of an incident occurrence.

The supervisor will immediately notify the general contractor and the mechanical/electrical contractor or customer we are working for of the Accident/Incident. The supervisor will then investigate the Accident/Incident and complete an Accident/Incident Report and distribute it to the on-site safety representative of the general contractor and mechanical contractor.

Employees shall apply the principles of accident prevention in their daily work and shall use proper safety devices and protective equipment whenever required. All HBIC jobsite employees have been trained in various safety areas including:

- Drug and/or Alcohol Impairment
- Minimum Dress Requirements
- Personal Protective Equipment
- Safe Material Handling
- Fall Protection and Retrieval
- Hazardous Communication
- Assured Grounding
- Equipment Inspection
- Fire Protection
- Respirator Protection
- Confined Space Entry
- CPR and First Aid Certification
- Blood borne Pathogen Awareness
- Asbestos and Lead Awareness
- Powder Actuated Tools (PAT)

It is with this training that an employee can review the workplace surroundings and provide an assessment of those conditions that create an unsafe work environment for themselves, co-workers, and others. It is required of each employee to immediately report those conditions that he/she does not deem safe to his/her immediate supervisor. The supervisor will assess the situation, notify the general and mechanical contractor immediately and correct the unsafe condition.

In case of an accident/incident the following must be reported to the jobsite foreman and the HBIC Safety Department ***AS SOON AS POSSIBLE:***

- Any injury to employees or the public; including jobsite first aid.
- Any exposure to blood or bodily fluids that might have occurred.
- Near misses
- Incidents resulting in property damage, fire or any other event involving potential liability which may lead to a claim against Hudson Bay Insulation Company.

The following reports must be filled out and returned to the HBIC Safety Department within 2 hours:

- The Employee Incident Report
- The Incident Investigation Report
- The Witness Incident Statement – *if there are any, by all who witnessed the incident*.

In the event of a serious injury which requires outside medical assistance, employees will follow these procedures:

- Dial emergency services, 911 or appropriate number– to request medical assistance.
- Contact the HBIC jobsite supervisor.
- Ensure that the emergency services route is clear and easy to follow, post other employees at entrance sites to aid in the response.
- Contact Chris Jenkins, Jennifer Moreau, or Greg Zevely, immediately following the arrival of medical services and they have taken control of the scene.

Post-accident investigation helps identify cause factors. A careful and complete accident investigation should reveal all the major contributing causes in the sequence of events; removing a single cause factor can prevent most accidents.

Management will document the circumstances of each accident individually. If the employee's actions or inactions can be completely discounted as a contributing factor to the accident, no testing will be conducted. When there is a reasonable possibility that drug use may have contributed to the accident, drug testing will be conducted. After individualized investigation, post-accident testing will also occur when required by contract.

Mobile Elevated Work Platforms (MEWPS)

Once the health and safety of an injured employee are turned over to the emergency medical services, the jobsite foreman/supervisor will follow these guidelines in investigating the incident.

- DO NOT disturb the accident/incident scene.
- DO NOT discuss the accident/incident with the media prior to notifying Chris Jenkins, Greg Zevely or Kyle Spane.
- Immediately start the Incident Investigation Report processing
- Interview and take statements from all witnesses.
- Submit all documents to the Safety Department within 2 hours.

A Job Hazard Analysis (JHA) shall be conducted prior to starting routine and non-routine work activities, new processes, changes in operation or products used to determine and establish proper work procedures. A job hazard analysis is a tool to help identify hazards that could be encountered while performing various tasks associated with our scope of work. Hazard identification training shall be given prior to job assignment including use and care of any PPE to be used.

A JHA lists, ranks, classifies, and sets priorities for hazardous conditions that may be present on a job. Conducting a JHA will help you discover the following:

- What can go wrong?
- What are the consequences?
- How could it arise?
- What are other contributing factors?
- How likely is it that a hazard will occur?
- How can we engineer out or minimize the occurrence of an injury or incident?

The most effective controls are engineering controls that physically change the work environment to prevent an employee exposure to the hazard. All employees of HBIC will continually review and update the JHA to ensure it remains current and continues to reduce workplace incidents and injuries. Even if the job has not changed, it is possible that during the review process, hazards may be discovered that were not identified in the initial analysis.

A JHA will be completed prior to the start of each Hudson Bay Insulation Company project by the Safety Director, Superintendent, Project Manager, and the jobsite Foreman. It will be reviewed throughout the duration of the project enabling superintendents, foreman and employees an opportunity to identify potential risks on this and other projects. A risk analysis matrix is used to categorize severity and probability of hazards. Foreman, superintendents, and the safety personal shall ensure the steps of the JHA are followed documentation is completed.
Each worker will review, make suggestions to alter or add items to the JHA and sign that they have read and understand the JHA.

All subcontractors of Hudson Bay shall conduct a JHA of their work (like what is described above), supervision and field employees shall be fully involved in the process. A copy shall be provided to Hudson Bay prior to start of work.

*A Job Hazard Analysis is located at the end of this manual.

Back strain and other related injuries account for more than 70% of all work-related incidents. Unfortunately, many workers only learn how to lift safely after already hurting their backs. Proper lifting techniques and stretching exercises should be used to minimize the occurrence of these injuries. Use material handling equipment as much as possible to do the heavy lifting and transportation for you. Planning and scheduling large equipment such as cranes and forklifts, hand trucks and carts greatly increase the efficiency on the job and reduce injuries.

Follow these rules when manually moving material.

- Plan the lift.
- Mover close to the load.
- Keep your back straight.
- Bend your knees & lift with your legs.
- Do not lift and twist in the same motion.
- If the load is too heavy get help from a co-worker.

MATERIAL AND EQUIPMENT TRANSPORT AND STORAGE
Hudson Bay Insulation has established a standard way material is to be transported and stored to protect said material from water damage, mold, and crush damage, etc.

Transport Procedures
All materials being transported to jobsites must always be protected from the elements. Material transported via Hudson Bay Insulation trucks must be visqueened and palletized.

Storage Procedures

- The selected storage area is to be free of standing water.
- If storage units are available, store material on pallets inside and secure closures.
- When materials are stacked, the underlying tiers must be able to withstand the weight of the material above.
- Materials shall be stacked in areas to allow passage of equipment and personnel without creating a safety hazard. If tiered, shall be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling or collapse.
- In areas where material storage can possibly be affected by weather conditions, all means necessary will be made to weatherproof the material with Visqueen or tarps.

- Combustible or highly volatile material shall be stored in a protected area of isolation, non-combustible shelter or a confined automatic fire protected room or area. Warning signs shall be posted to alert persons of potential danger.

Material will be stored in accordance with the manufacturer specifications.

Should material appear to be wet DO NOT INSTALL, please contact the warehouse so the material can be returned for evaluation. If you have questions regarding material handling, please contact the Warehouse Manager or Safety Director at 206-763-9484.

GENERAL WASTE MANAGEMENT

- Prior to work starting to ensure enough waste containers are available to properly sort bag and store waste generated.

- Waste is to be stored and handled to minimize the potential for any spill or impact to the environment. If needed, cover waste to prevent and control any scattering or potential run-off.

- Instruction of proper disposal method for waste will be conducted prior to work starting. Disposal of non-hazardous waste, trash and scrap materials will be covered. If hazardous waste is generated workers are to follow proper protocol, they were trained on.

- Segregation of waste materials is be followed to allow for proper recycling or reuse of the materials.

All employees of Hudson Bay Insulation Company will comply with the guidelines outlined in WAC 296-869 Mobile Elevated Work Platforms.

Operator Requirements
Only trained and authorized personnel will be permitted to operate the work platform. Before using the work platform, the operator will:

- Read and understand the manufacturer's operating instructions and safety rules and be trained by a qualified person on the contents of the manufacturer's instructions and safety rules.
- Read and understand all decals, warnings, and instructions on the work platform.

Daily before use, the work platform will be inspected, operators will:

- Inspect for defects such as cracked welds, hydraulic leaks, damaged control cables, loose wire connections, and tire damage.
- Inspect functional controls for proper operation.
- Annotate any suspect items discovered and a determination will be made by a qualified service person as to whether they constitute a safety hazard. All unsafe items shall be corrected before further use of the work platform.
- The inspection must be recorded on the aerial lift daily inspection log.

Before the work platform is used, the operator shall survey the area for hazards such as:

- Un-tamped earth fills
- Ditches
- Drop-offs or holes
- Bumps and floor obstructions
- Debris
- Overhead obstructions and high-voltage conductors
- Other possible hazardous conditions

Requirements for Operations
The work platform will be used only in accordance with the manufacturer's operating instructions and safety rules, ANSI A92.3-1990, and these standards:

- Only trained and authorized personnel shall be permitted to operate the work platform. Before each elevation of the work platform, the operator will:
    - Check for overhead obstructions and high-voltage conductors. A minimum distance of ten (10) feet from energized high-voltage conductors shall always be maintained between the conductors and the operator and platform equipment.
    - Ensure that the work platform is elevated only on a firm and level surface.
    - Ensure that the load and its distribution on the platform are in accordance with the manufacturer's rated capacity. The manufacturer's recommended load limits shall never be exceeded.
    - Ensure that outriggers and stabilizers are used if the manufacturer's instructions require their use.
    - Ensure that guardrails are properly installed, and gates or openings are closed.

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

- The operator will limit travel speed according to conditions. Conditions to be observed are ground surface, congestion, slope, location of personnel, and other factors that may create a hazard of collision or injury to personnel.

- Stunt driving and horseplay is not permitted.

- Personnel will maintain a firm footing on the platform while working thereon. Safety harness and connecting devices attached to manufacturer-approved anchorage points will be used in cases where employees need to leave the platform to access work. Free climbing is only allowed in the set up and disassembly of fall arrest system.

- Use of railings or planks, ladders, or any other device on the work platform for achieving additional height shall be prohibited.

- The operator will immediately report defects or malfunctions which become evident during operation and shall stop use of the work platform until correction has been made.

- Altering or disabling of safety devices or interlocks is prohibited.

- Care shall be taken to prevent ropes, electric cords, hoses, etc., from tangling with the work platform when the platform is being elevated, lowered, or moved.

- Work platform rated capacities shall not be exceeded when loads are transferred to the platform at elevated heights.

- The operator shall ensure that the area surrounding the work platform is clear of personnel and equipment before lowering the platform.

There are two types of personnel lifts, Group B (boom lifts) and Group A (scissor lifts).

Group B - Lift Requirements

Fall Protection

- Operators will wear a full body harness with back D-ring used to attach a connecting device from the harness back D-ring to the manufacturer supplied tie off point.

- Operators will not attach connecting device to the platform handrail or any other area of the lift other than the approved tie off point.

- When leaving or entering the lift platform in the raised position the employee shall be protected from a fall hazard by using a full body harness with back D-ring and connecting device attaching the harness to an approved anchorage point outside of the lift platform. Free climbing is only allowed in the set up and disassembly of fall arrest system.

Guardrail requirement

- A guardrail or other structure shall be provided around the upper periphery of the basket.
  - Top Rail shall be at least 36” (inches) in height.
  - Mid Rail shall be directly between the top and bottom rails.
  - Bottom Rail or Toeboard shall surround the exterior of the platform.

- Guardrail and midrail chains, or the equivalent, may be substituted across an access opening. Toeboards may be omitted at the access opening.

- The work platform shall have a minimum width of 18” (inches).

Group A - Requirements

Fall Protection

- When leaving or entering the scissor-lift platform in the raised position the employee shall be protected from a fall hazard via a full body harness with back D-ring and connecting device attaching harness to an approved anchorage point outside of the lift platform. Free climbing is only allowed in the set up and disassembly of fall arrest system.

- Do not attach lanyard to the scissors-lift handrail or any other area of

the lift unless the manufacturer specifies an anchorage point inside the scissor-lift.

- Gate chain shall be closed to prevent falling through the gate opening when the lift is in use.

Guardrail requirement

- A guardrail or other structure shall be provided around its upper periphery.
  - Top Rail shall be at least 36” (inches) in height.
  - Mid Rail shall be directly between the top and bottom rails.
  - Bottom Rail or Toeboard shall surround the exterior of the platform.

- Guardrail and midrail chains, or the equivalent, may be substituted across an access opening. Toeboards may be omitted at the access opening.

- The work platform shall have a minimum width of 18” (inches).

Compliance with DOSH regulations and to ensure that information is available about the dangers of workplace assignments where ladders, stairways and walkways are used as outlined by WAC 296-800-290, the following written Ladders, Stairways and Walkways Safety Program has been established. All Hudson Bay Insulation Company employees will abide by the Ladders, Stairways and Walkways Safety Program.

One-fifth of all industrial injuries result from falls and over 1000 people are killed each year from falls in the construction industry alone. The most serious of these involve falls from one level to another frequently when using stairs or ladders.

Leading causes of accidents involving ladders:

- Climbing or descending improperly.
- Failure to secure ladder - top and bottom.
- Structure failure of ladder itself.
- Carrying objects in hands while climbing or descending.

The Safety Director is responsible for the establishment, implementation, and maintenance of all aspects of this program. Prior to the start of any work performed as part of a project at a specific jobsite, the foreman/superintendent will formulate a Ladders, Stairways and Walkways plan.

It is Hudson Bay Insulation Company's policy that all ladders be thoroughly inspected for defects and the inspection recorded on the HBI Ladder Inspection Card.

- Always position a ladder properly so that you can face the ladder and use both hands while climbing.
- Ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, shall be annotated on the Ladder Inspection Tag and removed from service immediately until repaired or destroyed.

Extension Ladder Requirements

- Extension ladders shall extend a minimum of 3 feet beyond the supporting object when used as access to an elevated work area.
- After extending the extension portion of two or more stage ladder to the desired height, check to ensure that the latches are engaged.
- Extension ladders shall be secured or tied off at the top and bottom.
- All ladders shall be equipped with safety (non-skid) feet.
- Extension ladders shall be set at a 4:1 pitch.

Stepladder Requirements

- Do not place tools or materials on the steps or platform of a stepladder.
- Do not use the top two (2) steps or ladder-cap of a stepladder as a step or stand.
- Always level a stepladder and ensure that all the spreaders are locked in place.
- Do not use a stepladder as an extension ladder or lean-to ladder.
- Do not lean outside the left and right leg limits to reach a particular area, descend the ladder, and reposition.

Always position a ladder properly so that the distance from the base of the ladder to the wall is 1/4 the length of the ladder. Metal ladders will not be used by Hudson Bay Insulation Company employees on any job.

Fall protection is mandatory when working within 6 feet of an open shaft, stair or edge of deck.

Stairway Requirements

- A stairway shall be provided where there is a 19” (inch) or greater break in elevation in a passageway, entry, or exit. Constructed of non-skid materials.
- Stairways that will not be a permanent part of the structure on which construction work is being performed shall have landings not less than 30” (inches) in the direction of travel and extend at least 22” (inches) in width at every 12’ (feet) or less of vertical rise.
- Temporary stairs shall be 22” (inches) wide.
- Stairs shall be installed between 30° and 50° from horizontal.

Stairways that Require Guardrails
Stairways having four or more risers or rising more than 30” (inches), whichever is less, shall be equipped with:

- At least one handrail if one side of the stairway is against a wall, and/or
- One guardrail system along each unprotected side or edge.

Ramps, Runways and Walkways

- A ramp, runway or inclined walkway shall be provided where there is a 19” (inch) or greater break in elevation in a passageway, entry or exit.
- Ramps, runways, and inclined walkways shall be at least 18” (inches) or wider.

- Ramps, runways, and walkways shall not be inclined more than 20° from horizontal and shall be cleated or otherwise treated to prevent a slipping hazard.

Training
Prior to starting work and thereafter in accordance with regulations, each new employee will be given a health and safety orientation that included the following:

- An overview of the requirements of the regulations.
- Our policy and procedures related to Ladder/Stairways.
- How to identify all fall hazards in the work area.
- The correct procedures for handling, storing, and securing tools and materials.
- The method of providing overhead protection for workers who may be in or pass through worksites.

All HBIC employees will receive training on general ladder/stairways requirements that must be followed in the ordinary course of work. Foreman/Superintendent will provide jobsite-specific training prior to the start of the project.

Hudson Bay Insulation Company employees are not to remove or make friable in any way any lead-containing material. This information is for informational purposes only so that Hudson Bay employees can understand the process for their own protection. If you find any material that may contain lead, remove all employees from the area and notify the Safety Director immediately.

The following is HBIC's policy on the inspection and compliance procedures to be followed in protecting our construction workers from overexposure to lead. Compliance will be dictated by the standard (WAC 296-155-176) and include any repair, renovation or construction activity which disturbs lead-containing materials. Other activities include:

- Demolition or salvage of structures containing lead.
- Removal or encapsulation of materials containing lead.
- Installation of products containing lead.
- Lead containment / emergency clean up.
- Transportation, disposal, storage or containment of lead or materials containing lead on the site where construction is being performed.
- Abrasive blasting, welding, cutting, grinding and torch burning where lead containing coatings or paint is present.

DOSH's current rule states that the permissible exposure limit (PEL) is 50 micrograms of lead per cubic meter of air (50 UG/M3) averaged over an 8-hour period. Blood lead testing at regular intervals is required for all employees who work in areas with 30 UG/M3 or more airborne lead. Depending on the blood-lead level, an employee must be retested at specific intervals:

Most Recent Blood Lead Level (ug/dl)	**Blood Testing Required by Lead Standard**
None	Immediately
0 - 39	Every 6 months
40 - 59	Every 2 months
60 or above	Every month
Worker on lead-related medical removal for any reason	Every month

General Requirements

If testing shows that any employee has a blood-lead level above 40 ug/dl we will either reduce lead dust and fumes in the workplace or provide adequate respiratory protection. The following measures are included in this policy to protect all employees from over exposure to lead. They Include:

- When PEL reaches 50 or more micrograms per cubic meters of air (50 UG/M3), we will provide respiratory protection, protective clothing, hand and face washing facilities, biological monitoring, and changing areas during the performance of specific tasks that involve lead exposure. These measures will be taken until the exposure assessment shows the exposure levels are below the PEL.

- A competent person will be named to be responsible for lead-related issues on all work sites. This person will always be on site and responsible for inspections that ensure there are proper control measures, work practices, personal protective equipment, and hygiene facilities used as prescribed by the DOSH standards.

- A written compliance plan will be available on all work sites, as well as a specific plan for conditions on each work site. Each worker is given a copy of this plan.

- Protective clothing will be provided and worn when PEL reaches 50 UG/M3 or more. Soiled clothing will be stored in closed containers and laundered or disposed of by the employer. Lead contaminated clothing will not be taken home.

- All personal protective equipment will be properly fit tested for each employee by a competent person.

- All employees will be educated about the hazards of lead exposure and trained in proper work procedures, control measures, and emergency procedures from exposure to lead.

- Accident reports involving lead, exposure logs, and medical records will be kept up to date and on site.

- An employee will be sent home or removed from areas having lead exposure if a blood test is 60 ug/dl or above, or if an average of the last three tests are 50 ug/dl or above.

- We will provide at least one medical evaluation each year and blood lead tests every 1 to 2 months for an employee whose blood lead level is 40 ug/dl or above, at no cost to the employee.

- Highly visible warning signs will be posted in high lead areas.

Job Site Specific Requirements
All projects will have a site-specific lead exposure program, including a log describing each operation in which lead is emitted. Each log will include:

- Machinery used.
- Material processed.
- Controls in place.
- Crew size.
- Employee job responsibilities.
- Operating procedures.
- Maintenance practices.

Included in each site-specific program will be a description of the specific means employed to achieve compliance including engineering plans, technology used to meet permissible exposure limits and air monitoring data when required.

Hudson Bay Insulation Company has developed a Lock Out/Tagout (LOTO) program to establish the procedures for the control of potentially hazardous energy sources. This program has been put in place to ensure that machines, equipment, or fixtures are isolated from all potentially hazardous energy sources, *before* employees perform any service, maintenance, demolition, or installation activities on them.

Documented training occurs at initial orientation and whenever there is a change in employee job assignment, machines, energy control procedures or a new hazard is introduced.

The lockout/tagout protocol applies to all permanently wired machines and equipment. Cord and plug connected equipment should be exempt, provided that the cord is unplugged *and* under the direct control of the employee performing the service or maintenance.

An *Affected employee* is an employee whose job requires him/her to operate or use a machine or equipment on which servicing, or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

An *Authorized employee* is a person who locks out or tags out machines or equipment to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under this section.

Preparing for shut down and lockout/tagout of equipment; all authorized and affected people and departments shall be identified and notified of our LOTO actions.

Coordination of the shutdown of machines, systems and equipment shall be completed with operators/owners to ensure proper procedures are followed and all energy or potential energy has been isolated and effectively locked out.

Isolate Energy Sources and Systems
Identify and isolate systems that involve electricity, liquid, steam, gas, hydraulic, tension, gravity, or other stored energy that could present a hazard if released. All valves and openings shall be identified and closed by means of a secured method. These identified locations shall be secured with a lock and tag.

Be aware of and protect against stored energy or the possibility of re-accumulation of energy. Verify the energy has indeed been isolated.

Lockout/Tagout Requirements
Locks/Devices

- Authorized locks/devices including locks keyed differently, "Do Not Operate" tags, hasps, lockouts for cable, circuit breaker/fuse, electrical plugs, pneumatic hose, wall switch, push button, rotary, valve, and hoses all can be obtained through the safety department.
- LOTO devices shall be placed, only by an authorized employee, on each isolating device as required and when permitted.
- The key(s) are to remain with the individual applying the lock.
- A means of recording the lock ID and location is required with each lockout/tagout procedure.
- LOTO devices shall be affixed in a manner that will hold the energy isolating devices in a safe or off position and clearly indicate that the operation or movement of energy isolating devices from the "safe" or "off" position is prohibited.

Keys

- The person administering the lock shall maintain their key for the lockout/tagout duration.

Tags

- Identifying tags shall accompany each applied lock. Each tag shall include the following information:
    - Person's name administering the lock.

- Time the lock was administered.
- Person's employer
- Contact phone number or radio number for the person administering the lock.

Lockout/Tagout Removal Requirements
The authorized employee shall ensure the following before temporary or permanent removal of locks and/or tags and devices, including testing, repositioning of equipment or machinery.

- Clear the machine or equipment of tools and materials, the work area shall be inspected to ensure that nonessential items have been removed and to ensure that machine or equipment components are operationally intact.
- The work area shall be checked to ensure that all employees have been safely positioned or removed.
- Authorized employees that installed the LOTO device shall remove the lock and or tag and device. If person is unable to perform this task all reasonable efforts will be made to contact the authorized employee to inform him/her that his/her lockout or tagout device has been removed; and ensuring that the authorized employee has this knowledge before he/she resumes work at that facility.
- Affected employees shall be notified that the locks and tags are being removed.
- Energize and proceed with testing or positioning; De-energize all systems and reapply all energy control measures, verify all steps above have been followed and continue with maintenance or servicing as required.

Violation of this policy will result in corrective action up to and including termination.

The Safety Department, Superintendents, and the jobsite foreman are responsible for the new hire safety orientation. These individuals will ensure that all elements below and any job specific safety requirements are communicated to all new employees. Prior to starting work, each new employee of the Hudson Bay Insulation Company will receive information and training on all company policies, programs and practices listed below:

- Safety Concerns.
- Emergency Procedures.
- Bloodborne Pathogens.
- Daily Pre-task planning.
- Fall Protection.
- Ladder Safety.
- Material handling and storage.
- Respiratory Protection Program.
- Hearing Conservation.
- GHS / HAZCOM / SDS.
- Fire Protection Program.
- Assured Grounding Policy.
- Lock Out/Tag Out.
- Confined Space.
- Heat Stress.
- Knife Safety.
- Equipment/Tool Inspection Program.
- Vehicular Traffic.
- Workplace Violence.
- Substance Abuse Policy.
- Required Safety Documents.

To maintain a work environment free of accidents and incidents, Hudson Bay Insulation Company requires all employees to adhere to its Personal Protective Equipment (PPE) policy and procedures. This will ensure that when hazards cannot be fully controlled with engineering or process controls employees use appropriate personal protection.

Appropriate documented training on the use and maintenance of PPE will be provided by, or arranged for by, the Safety Director or supervisors. All HBIC employees are required to wear proper personal protective equipment while performing their work-related duties. Retraining will be conducted if workplace hazards change, improper use occurs, and insufficient skill or understanding are encountered.

The PPE (fitted to each employee) provided shall be used as outlined by specific job procedures and maintained in a sanitary and reliable condition. Defective, outdated, or damaged PPE shall not be used. Employees shall not provide any of their own personal protective equipment, unless inspected and approved by the Safety Director. The selection of PPE shall be made by the Safety Committee and designed to match the hazard to allow employees to safely conduct their job tasks.

PPE is designed to protect the worker from injury or harm. However, it is not designed to prevent the *occurrence* of an incident which might cause harm or injury. Therefore, we must ensure that working conditions are safe and PPE is used as a back-up for additional protection.

This policy outlines the minimum requirements for personal protective equipment including:

- Appropriate clothing
- Head protection
- Hearing – ear protection
- Eye and Face protection
- Hand protection
- Foot protection

Appropriate Clothing

- Long pants are always required. Shorts, dresses, and sweatpants are not allowed on the jobsite.

- Shirts shall have a minimum sleeve length of 4” (inches). No muscle, mesh, tank top or similar shirts are allowed on the jobsite. High Visibility long-sleeved shirts are highly recommended and available through the safety department at no cost to the employee.

- Clothing that may get caught in tools or equipment, such as loose fitting, torn or ragged clothing shall not be allowed on the jobsite.

- High Visibility clothing will be worn as an outside layer to differentiate the employee from the work environment. High Visibility vests and shirts are available through the Safety Department.

- Weather appropriate clothing will be worn in conditions of inclement weather.

Head Protection

- Safety helmets are to be used to protect the head from flying objects, impact, and electrical shock.

- Only ANSI Type 2 safety helmets will be used by all HBIC employees at construction sites or when overhead hazards are present. This includes when working under floor openings or walkways, protruding objects, or inside a confined space below ground level.

- Safety helmets will be worn whenever 'hard hat' signs are posted regardless of whether an overhead hazard exists. Hard Hats are available and will be issued through the Safety Department.

- Only approved safety helmet liners are accepted for wear under the hard hat.

Hearing Protection

- Earmuffs and earplugs are used to protect against hazardous noise levels when they cannot be adequately lessened by various engineering controls. The sites' noise levels will vary a great deal. Areas requiring hearing protection shall be posted. If not, hearing protection should be worn whenever there are loud sounds from power equipment or processes.

- Hearing protective devices are supplied to all employees through the Safety Department.

- If earmuffs are worn, temple bars of glasses will interfere with the seal of the earpiece. As a result, ear plugs should be worn by those required to wear safety glasses or glasses with corrective lenses.

Eye and Face Protection

- Safety glasses or prescription glasses with safety lenses and side shields will be **always worn.**

- Only ANSI approved safety glasses will be worn, they are available through the Safety Department.

Hand Protection
All Hudson Bay Insulation Company employees are required to wear gloves, regardless of activity. Hand protection is worn to protect the hands from mechanical injury due to friction, heat, shearing/cutting actions, and for protection against chemicals.

- Gloves are available through the Safety Department
- A Cut-Level 3 or greater glove is required for all job tasks.

Foot Protection
All Hudson Bay Insulation employees will wear appropriate footwear while performing work.

Footwear shall be full leather or synthetic material approved for heavy use with a non-slip sole. Steel toe boots are not required by HBIC; however, some jobsites may require them as a minimum standard of foot protection. Protective Toe Caps are available through the Safety Department.

Pre-Task Planning will be used to recognize existing and potential hazards involved with each activity by task specific identification and training. Pre-Task Planning is also a tool for work crew coordination and communication needs to reinforce "best practices" on a jobsite.

Procedure
All Hudson Bay Insulation Company foremen will complete a daily pre-task plan for each specific task being performed during that workday. The pre-task plan should be completed at the beginning of each work shift with the crew's input completed at the location of the task. The completed pre-task plan will then be used as a tool to coordinate the safety and production effort of the crew throughout that shift.

The foreman shall discuss the pre-task plan with the crew having them sign the pre-task plan form documenting that they understand the tasks to be completed and the method of procedure for minimizing potential hazards.

If performance of the task requires deviation from the posted plan, the crew is to immediately cease work and notify supervision. Supervisor and crew shall re-assess the plan, make necessary modifications, re-communicate any additional changes, initial the worksheet, and post the modified plan before resuming work.

Documentation
All pre-task plans shall be kept on file at the jobsites with the foreman or turned in to the General Contractor or our customer.

The daily PTP may be completed electronically by using the HBIC LMS and submitted to requesting parties via email.

Recordkeeping is a key aspect in developing and maintaining a comprehensive safety program. The following outlines Hudson Bay Insulation Company procedures for document management.

Kept on file at the jobsite.

- Site Specific Safety Plan.
- Job Hazard Analysis & Pre-Task Planning.
- Toolbox Talks and Safety Meeting Report.
- Jobsite Safety Orientation.
- MEWP and Ladder Inspection Tags.
- Assured Grounding Log.
- All Confined Space Permits *(with a copy sent to the Safety Department).*
- Scaffold Daily Checklist *(with a copy sent to the Safety Department).*

Kept on file at HBIC office.

- Safety & Risk Management Plan.
- Drug Free Workplace Program.
- OSHA 300, 300A and 301 Logs.
- Safety Committee Meeting Reports.
- Site Safety Audits.
- Corrective Action Reports.
- Incident Reports.
- Confined Space Permits.
- Scaffold Daily Checklists.
- Safety Training Documentation.
- SDS Inventory List.

OSHA recordkeeping will be kept on file and updated through the Safety Director.

Injuries will be reported and recorded as prescribed by OSHA or the state's governing agency. An occupational injury or illness is recordable if it is work related **and** meets one or more of the following criteria:

- It results in a death.
- There is a loss of consciousness.
- There are days away from work, restriction of work or motion, or transferred to another job.
- There is medical treatment beyond First Aid.
- A significant injury or illness is diagnosed by a licensed health care professional.

The following is a complete list of treatments considered by OSHA to be First Aid. If the injured worker receives any of these treatments, and none of the (5) criteria listed above apply, ***the injury is not a recordable.***

- Tetanus immunizations.
- Non-prescription medication at non-prescription strength.
- Cleaning, flushing, or soaking of wounds on the surface of the skin.
- Covering wounds with items such as Band Aids®, gauze pads, butterfly bandages or Steri-Strips®.
- Heat or cold therapy.
- Non-rigid support, such as elastic bandages or wraps.
- Temporary immobilization during transport as an accident victim.
- Drilling of fingernail or toenail to relieve pressure or draining of a blister.
- Eye patches.
- Removal of foreign bodies from the eye by irrigation or with a cotton swab.
- Removal of splinters or foreign material from areas of the body other than the eyes by irrigation, tweezers, cotton swab or other simple means.
- Use of finger guards.
- Massage therapy.
- Drinking fluids for relief of heat stress.

Purpose:
Hudson Bay Insulation Company hereby adopts this written Respirable Crystalline Silica Exposure Control Program for all employees and personnel under the supervision of this organization who are potentially exposed to airborne respirable crystalline silica particles. The purpose of the Respirable Crystalline Silica Exposure Control Program is to provide information, guidelines, control measures and training to eliminate exposures to respirable silica dust in the excess of the action levels established by OSHA 29 CFR 1926.1153.

Hudson Bay Insulation Company will comply with 29 CFR 1926.1153 Table 1 requirements and controls as part of this company's written silica exposure control plan.

Scope:
This program covers all Hudson Bay Insulation Company employees who are engaged in silica releasing activities including, but not limited to, such activities as mixing, cutting, grinding, sanding, sweeping, and drilling of concrete, stucco, fireproofing or other silica containing materials.

All personnel in areas where these activities are or could be present shall be familiar with the proper safe work practices, engineering controls and precautions associated with respirable crystalline silica.

Policy:
It is the policy of Hudson Bay Insulation Company to control and minimize worker exposure to respirable silica to amounts not more than the action levels as established by OSHA. In this program, all fireproofing materials, masonry products and concrete products are presumed to contain trace amounts of silica as per their SDS.

OSHA uses a benchmark 8-hour, time-weighted average exposure of 50 mg/m3 of respirable silica as a point of reference for the permissible exposure limit and 25 mg/m3 as the action level related to airborne silica. Hudson Bay Insulation Company's Silica Protection Program will meet the OSHA standards, as the applicable law, at a minimum and will work toward processes and controls which take into consideration more stringent exposure recommendations.

If a dust producing activity, such as sweeping, drilling, or mixing is performed on a material known to contain silica, or when it is unknown whether such material contains silica, that dust producing activity must be performed in conjunction with adequate engineering controls, administrative controls and/or proper ergonomics to protect against exposures more than any action levels established by OSHA.

The physical disturbance of concrete products or any silica containing material, by tool or piece of equipment (drilling, mixing, etc.) will not be allowed unless engineering controls or administrative controls are put in place to reduce exposure levels below the action levels as established by applicable law. If site conditions make the use of engineering controls, such as wet method or vacuum systems, or

administrative controls infeasible, a site-specific plan for associated dust control measures that are to be implemented must be reviewed and approved by the Safety Director.

Training:
The Safety Director will train all employees who will be working in areas where respirable crystalline silica could be present, and possible exposure could occur. This training will be specific to the task and include the health hazards associated with respirable crystalline silica, the methods to identify possible silica containing material, the means to mitigate exposure and the proper personal protective equipment that must be used when a possible exposure could exist.

Training will also consist of the specific requirements found in 29 CFR 1926.1153 Table 1 and the activities, hazards and control methods listed to be following the regulation.

Competent Person:
Competent person means an individual who can identify existing and foreseeable respirable crystalline silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them. The competent person must have the knowledge and ability necessary to implement the written exposure control plan required under the standard.

The Safety Director and a Division Superintendent shall identify a competent person responsible for the inspection and management of this written silica exposure control program and identifying any possible activities where exposure could occur. The Competent Person will be responsible for oversight and implementation of the company's written silica exposure control plan and shall be trained in the regulations found in (OSHA) 29 CFR 1926.1153 standards. The competent person will also be trained in the inspection process of work areas and equipment that is or could be related to airborne respirable crystalline silica and associated activities.

Medical Surveillance:
Hudson Bay Insulation Company shall institute medical surveillance for any employees required by this Plan to wear a respirator 30 or more days per year. *If a respirator is worn for any portion of a day, it counts as 1 day for the purpose of this 30-day provision.* Initial medical surveillance consists of medical and work history with emphasis on past, present, and anticipated exposure to silica, dust and other agents affecting the respiratory system. This medical surveillance program will follow the guidelines set for in (OSHA) 29 CFR 1926.1153 and all applicable regulations, including chest X-rays and lung function tests, every 3-years. All subcontractors will be responsible for implementing a medical surveillance program for their own employees.

An accurate record will be maintained for each employee who is medically surveilled under this plan. The record will include the following information about the employee:

- Name and Social Security Number

- A copy of the PLHCP's and specialists written opinions; and
- A description of the employee's former, current, and anticipated duties as they relate to crystalline silica exposure.
- A description of the employee's former, current, and anticipated respirable crystalline silica exposure levels.
- A description of the personal protective equipment used by the employee.
- And information from previous employment-related medical examinations that is currently within the control of Hudson Bay Insulation Company.

Exposure Assessment:
All Hudson Bay Insulation Company employees will comply with and implement all controls required by 1926.1153 Table 1- Exposure Control Methods for Selected Construction Operations or as an alternative conduct an initial determination in accordance with 29 CFR 1926.1153(d)(2).

- The competent person will make an initial assessment of exposure to determine the appropriate Table 1 control method to protect employees and others in the affected area.
- A competent person will inspect the work area and ensure all appropriate personal protective equipment is provided and is in good working order.
- A competent person will determine the appropriate respiratory protection that is required and ensure all workers are properly provided with and trained in the use and care of all respiratory equipment that is used.
- If engineering and control methods are used in silica control and abatement processes, the competent person will ensure these measures offer satisfactory protection for all employees and others that could be in the affect area and are also maintained in good and proper working order.
- If conditions warrant or alternative measures are employed, the competent person will engage an Industrial Hygienist (IH) to review, inspect and implement proper control measures necessary for compliance.

Engineering Controls and Work Methods:
If silica exposures exceed or are expected to exceed action levels and/or permissible exposure limits (PELs), engineering and work practice control methods will be implemented to reduce all exposures to nonhazardous levels below the PEL.

Engineering Controls include but are not limited to the following:

- *Water Delivery Systems* - Integrated water delivery systems are required for several types of equipment in Table 1. Integrated water systems must be developed specifically for the type of tool in use so they will apply water at the appropriate dust emission points based on tool configuration and do not

interfere with other tool components or safety devices. Water systems designed for blade cooling also suppress dust and meet the requirements for Table 1. Any slurry generated when using water to suppress dust should be cleaned up to limit secondary exposure to silica dust when the slurry dries, follow procedures described in the employer's Written Exposure Control Plan.

- *Dust Collection Systems* - Commercially available dust collection systems are required for several types of equipment in Table 1. This equipment may be integral to the tool or provided as an external option to comply with the provisions of this engineering control. This requirement ensures that employers use equipment that is designed to effectively capture dust generated by the tool being used and does not introduce new hazards such as obstructing or interfering with safety mechanisms.

- If administrative controls are used to limit exposure, the competent person will establish and implement a job rotation schedule that includes employee identification as well as the duration and exposure levels at each job or workstation where each affected employee is located.

Work practice controls involve performing a task in a way that reduces the likelihood or levels of exposure. Work practice controls are often used with engineering controls to protect employees. Employees must know the appropriate work practices for maximizing the effectiveness of controls and minimizing exposure. Examples of work practice controls include:

- Using water spray nozzles at the point of dust generation as a wet-control method and minimize exposure.

- Making sure all hoses for water and dust collection systems are free from any obstructions that could affect proper operation.

- Wetting down or using approved material to minimize dust during sweeping and/or clean-up operations.

- Scheduling work when no other employees will be exposed to any hazardous dust.

Reducing exposures through the primary use of engineering and work practice controls is also known as the hierarchy of controls.

Personal Protective Equipment:
Hudson Bay Insulation Company will provide employees, at no cost to the individual, protective work clothing and equipment including cotton coveralls or similar full-body clothing, gloves, disposable shoe coverlets, face shields, vented goggles, or other appropriate PPE where necessary.

Personal protective equipment for the control of respirable crystalline silica includes but not limited to the following:

- Respirators – See 29 CFR 1910.134 for requirements of a written respirator program.
- Garments or other coveralls that can be worn to prevent contamination of a worker's personal garments and prevent cross contamination.
- Gloves.
- Eye and Face Protection.

Ensure that PPE:

- Is properly evaluated and inspected for exposure and is appropriate for the environment.
- Is stored and maintained properly and in good working order.
- You have been provided with training and proper instructions on the use and limitations of the PPE that is provided.

Housekeeping:
Hudson Bay Insulation Company has developed this written plan and procedures to minimize generating airborne respirable crystalline silica. This program generally prohibits dry sweeping, dry brushing or using compressed air when respirable silica particles are present. This program also includes a plan for when other approved methods may not be available. This includes the following:

- Restricting housekeeping practices that expose employees to respirable crystalline silica where feasible alternatives are available.
- What methods the employer will permit and prohibit to minimize airborne silica
- Instructions for compliance with manufacturer's instructions and accepted safe work practices used during the cleanup process.
- Not allowing dry brushing or dry sweeping unless methods such as wet sweeping and HEPA-filtered vacuuming are not feasible.
- Proper individual hygiene when working with and around respirable crystalline silica.
- When and where a respirator is required or there is any specific precautions when using a specified housekeeping procedure.
- Not allowing cleaning of surfaces or clothing with compressed air, unless the compressed air is used together with a ventilation system that effectively captures the dust cloud or no other cleaning method is feasible.

Procedures to Restrict Access:

- Hudson Bay Insulation Company will restrict access to other employees and non-employees in areas where exposure levels could exceed permissible limits and where a respirator may be required by using warning signs, barricades, and other notification procedures

- The information will be communicated during job briefings, safety talks and host/employer construction meetings and with all company employees, general contractor employees, sub-contractor employees and temporary workers.

- This procedure may include the scheduling of work when other employees and non-employees would not be in the affected area(s).

Recordkeeping:
All exposure and medical records will be kept and maintained by Hudson Bay Insulation Company, both in written and electronic form. They will be made available to employees, their representatives and OSHA in accordance with this program.

Specified Exposure Control Methods:
The specific tasks as performed in the normal scope of work for Hudson Bay Insulation Company employees has been identified in Table 1 and listed below:

Table 1: Specified Exposure Control Methods
When Working with Materials Containing Crystalline Silica

Equipment/Task	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum Assigned Protection Factor (APF)	
		< 4 hours/shift	>4 hours/shift
(vii) Handheld and stand-mounted drills (including impact and rotary hammer drills)	Use drill equipped with commercially available shroud or cowling with dust collection system. Operate and maintain the tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.	None	None

General

It is the policy of Hudson Bay Insulation Company to provide and maintain a safe and healthful workplace for all employees, including those whose work assignments expose them to airborne contamination. To that end, the company has developed this program for the selection, use and care of respiratory protection. The company expects all employees to abide by the rules of this program, which are effective immediately and are mandatory.

Availability of Respirators

Each employee that is required to wear a respirator will be issued one along with replacement parts, cartridges, and filters as needed. The selected types of respirators are available from the Project Superintendent or Safety Director.

Use of Respirators

Each employee is required to wear an approved respirator, properly always fitted while performing an operation defined as HAZARDOUS or in the immediate area for an extended period of time where another employee is performing a HAZARDOUS operation. Any employee that desires to voluntarily purchase, wear, and maintain an air purifying respirator for personal reasons, must pass a medical evaluation prior to use. A copy of Table 2 Advisory Information for Employees Who Voluntarily Use Respirators in accordance with WAC 296-842-11005 will need to be signed and a copy provided to the employee. Filtering face pieces (dust masks) are available at no cost to employees to voluntarily wear as desired or needed. Manufacture instructions and warnings are to be followed.

Types of Respirators

Only NIOSH approved respirators have been chosen for use in this program. The choice between these respirators is dependent upon the airborne contaminant present, the HAZARDOUS operation performed, and based on comfort and ease of obtaining a proper individual fit. The useful life of each respirator will vary depending on the job duties and the actual time in use. Particulate cartridges / filters should be changed when filter resistance makes breathing difficult. Chemical cartridges should be changed when an odor or taste breaks through or based on the established change out schedule.

Each respirator will have some limitations. Refer to the respirator instructions. Air purifying types must only be used in at least 19.5 percent oxygen. Only pressure demand SCBA or a supplied airline with SCBA backup can be used in Immediately Dangerous to Life or Health (IDLH) atmospheres.

Training of Employees

Each respirator user will be shown and trained how to use and maintain the respirator. The Safety Director will give this training. A record will be kept of those employees who have been trained. Each user must understand and be able to apply the contents of this respirator program in the daily use, care, and safekeeping of the respirators. As proof of having received training and instructions, employees in the respiratory protection program will be asked to sign a statement thereunto.

Evaluation For Respirator Use
To determine an employee's fitness for respirator use, the employer shall provide a medical evaluation. This evaluation shall be provided to employee(s), being assigned to a job that requires the use of an air purifying respirator.

Fitting of Respirators
Proper fitting of negative pressure respirators is essential if employees are to receive the protection for which this program is designed. Air which passes around the face piece of the respirator, rather than through it, is not filtered air. To ensure a good face seal, follow the manufacturer's fitting instructions and the rules below:

- The respirator and all straps must be in place and worn in the appropriate position. To adjust headbands, pull the free ends tight until a comfortable but effective fit is obtained.
- To adjust the face pieces properly, simply position the chin firmly in the chin cup and manually shift the mask until the most comfortable position is located. Make final adjustments to the headband and do not break the nose seal. Modification to the respirator or straps cannot be made.
- No beards allowed! Respirators shall not be worn when projections under the face piece prevent a good face seal. Note: such conditions may be a growth of beard, sideburns, temple pieces on glasses, or a skull cap that projects under the face piece.
- Perform the following pressure fit checks every time a respirator is worn:
    - Cover air inlets with palms of hands.
    - Gently breathe in so that the face piece collapses slightly.
    - Hold breath for ten (10) seconds.
    - If the respirator remains slightly collapsed and no inward leaks are felt, the face piece probably fits tight enough.
    - Cover air outlet.
    - Exhale gently.
    - A small build-up of positive pressure, but no outward leaks, usually indicates a good face piece fit.
- A qualitative fit test will be conducted on each new employee or new type of respirator used. The fitted respirator must be tested using the appropriate qualitative fit test.
- Irritant smoke tests will be used to determine qualitative fit.
- In the event an employee is unable to obtain a satisfactory fit with the type of respirator furnished, a new brand, type or size will be tried.

Cleaning and Storage of Respirators

Respirators should be cleaned after each day's use and placed in a sealable bag or stored in another container provided for this purpose (zip-lock bags or a clean coffee can). Do not leave them in the work area or hang on a nail.

About once a week (or more often if needed) respirators should be completely cleaned and disinfected by carrying out the following procedures:

- Remove the cartridge from the respirator. The cartridge must never be washed and disinfected.
- Immerse the respirator in a warm soap and water solution. The respirator face piece and parts may be scrubbed gently with a cloth or soft brush. Make sure that all foreign matter is removed for all surfaces of the rubber exhalation valve flap and plastic exhalation valve seals.
- Disinfect with a commercial solution, alcohol wipes, or two (2) tablespoons of bleach or one teaspoon of tincture of iodine per gallon of water.
- After washing and disinfecting the respirator, rinse the same with clean, warm water and then allow the respirator to air dry. Do not store the respirator with wet straps, mildew will result. The face piece, inhalation and exhalation valves must be in a normal position during storage to prevent the abnormal "set" of elastomer parts.
- After the respirator is dry, re-attach the cartridges.
- Store the respirator.

Any malfunction on the respirator shall be reported to the Project Superintendent or Safety Director, who will supply replacement parts.

Each person assigned to use a respirator shall maintain and routinely inspect it before and after each use.

Note: Stretching and manipulating rubber or elastomer parts with a massaging action will keep them pliable and flexible and prevent them from taking a "set" during storage.

Worn out parts will be replaced immediately.

Only trained Hudson Bay Insulation Company personnel shall work on, erect, or dismantle scaffold for Hudson Bay Insulation Company, they shall be designated as competent people. HBIC personnel shall not erect scaffolds greater than 3 sections tall. Anything greater than 3 sections tall will be installed and dismantled by a qualified vendor. Perry or "Baker" style scaffolds will have safety rails above 6' (feet) and wheels will be locked when in use.

PROCEDURES
The HBIC designated Competent Person will inspect and fill out the Scaffold Safety Checklist daily prior to using the scaffold.

General Requirements

- **Capacity**
  - Scaffolds shall be designed by a qualified person and shall be constructed and loaded in accordance with that design.
  - Each scaffold and scaffold component shall be capable of supporting, without failure, its own weight and at least 4 times the maximum intended load applied or transmitted to it.
- **Erection**
  - Scaffolds must be erected under the supervision of a competent person.
- **Planking**
  - Only scaffold grade planking shall be used.
  - When possible, all working levels must be fully planked.
- **Supported Scaffolds**
  - Scaffold poles, legs, posts, frames, and uprights must be placed on compatible wheel assemblies or steel base plates, then mudsills or other adequate firm foundations.
  - Steel plates must be secured to the mudsills.
  -
  - When free standing scaffold exceed four times their minimum base dimension vertically, they must be restrained from tipping.
- **Suspension Scaffolds**
  - Counterweights must be made of non-flowable material. Sand, gravel, water, or similar material may not be used.
  - Counterweights must be secured to the outrigger beams by mechanical means to prevent accidental displacement.

- Outrigger beams that are not bolted to the structure must be secured by tiebacks.
    - The tiebacks must be attached to a structural member of the building.
    - Standpipes, vents, conduit, and other piping systems are not adequate structural members.

- **Scaffold Access**
    - When scaffold platforms are more than 2’ above or below a point of access, proper ladders must be installed. Cross bracing must never be used as a means of access.
    - Stair rail and handrail systems must be smooth surfaced to prevent lacerations or puncture wounds.
    - A competent person must evaluate and decide whether a ladder, or other safe means of access, is feasible during the erection and dismantling of scaffolds.

- **Scaffold Use**
    - A competent person must inspect each scaffold before every shift and after any occurrence that may affect its structural integrity.
    - Scaffolding inspection checklist is included at the end of this section.
    - A tagging program shall be used to verify daily inspection of the scaffolding, stair tower or similar. If the tag system is used:
        - The tag shall be present on all scaffolding.
        - The competent person will “tag” the scaffold “in service” or “out of service” prior to employee use.
    - Any damaged or defective component discovered during the inspection will require:
        - Scaffolding immediately taken out of service until the component is repaired or replaced.
        - Scaffolding shall be tagged as “out of service” by a positive means.

- **Fall Prevention**
    - A Personal Fall Arrest System (PFAS) or guardrail system must be in place on all scaffolds at 6 feet or higher.
    - Cross bracing may only be used as the midrail, if the manufacturer designed it for this use or a qualified person determines that it meets the DOSH Standards for use as midrail.
    - The use of fall prevention devices are required during the erection or dismantling of a scaffold.

- On suspension scaffolds the personal lifelines must be independent of the scaffold support lines.

- **Falling Object Protection**
  - The area below a working scaffold must be barricaded to protect employees from a falling object hazard.
  - Toeboards or other means of falling object protection is always required.

Requirements for Specific Scaffold Types

- **Tube and Coupler Scaffolds**
  - Tube and coupler scaffolds, more than 125', must be designed by a registered professional engineer (RPE).

- **Fabricated Frame Scaffolds**
  - Frames and panels must be braced by cross, horizontal, or diagonal braces.
  - Frames and panels must be joined together vertically by stacking pins or equivalent couplings.
  - Frame scaffolds, more than 125', must be designed by an RPE.

- **Pump Jack Scaffolds**
  - Brackets, braces, and accessories must be fabricated from metal.
  - Each pump jack bracket must have two positive gripping mechanisms to prevent failure.

- **Mobile Scaffolds**
-
  - Mobile scaffolds must be braced by cross, horizontal, or diagonal braces based on manufacturer's requirements to prevent racking during movement.
  - All wheels must be locked when in use.
  - At no time will a worker "self-propel" a mobile scaffolding.
  - Caster and wheel stems must be pinned to the scaffold legs or adjustment screws.
  - Scaffold sections must be pinned to prevent displacement.
  - The height to base width ratio on a mobile scaffold cannot exceed 2:1 unless it is braced with outrigger frames.

- Scaffolds that are less than 45” in width (Baker Type), a guardrail is required when working height is greater than 6 feet above the floor. In addition, if more than one section is used on this type of scaffold, outriggers must be used. Do not attempt to move mobile scaffolding without sufficient help to watch for obstructions on the floor and overhead.

Scaffold Training Requirements

Each employee that works on a scaffold must be trained by a qualified person in the recognition and avoidance of hazards associated with the type of scaffold they will be required to work from.

The training shall include the following areas, as applicable:

- The nature of any electrical hazards and falling object hazards in the work area.
- The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
- The proper use of scaffold, and the proper handling of materials on the scaffold.
- The maximum intended load and the load carrying capacities of the scaffolds used.
- Each employee involved in the erection, dismantling, moving, operating, repairing, maintaining, or inspecting of a scaffold must be trained by a qualified person in the recognition and avoidance of hazards associated with these operations.
- The nature of scaffold hazards.
- The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in question.
- The design criteria, maximum intended load carrying capacity and intended use of the scaffold.
- Any other pertinent requirements of OSHA or DOSH regulations.
- Fall protection.
- Re-training will be done as inadequacies in workers’ knowledge and understanding are discovered, as situations and hazards arise, or type of scaffold is one that the worker has not previously been trained.

Site safety audits will be conducted per WAC 296-155-110(9), weekly by Hudson Bay Insulation Company supervision, to include at least one or more of the following: the Safety Director, Safety Coordinator, Superintendents and/or, Project Managers and/or Foreman and one employee.

A "walk around" site safety audit will be conducted to assure compliance with HBIC safety policies and safe work practices are being followed. Each inspection will be documented on the Site Safety Audit Form within the HBIC LMS and follow-up action will be taken as necessary to correct any deficiencies to prevent their reoccurrence.

Any hazards identified will be addressed immediately. Safety deficiencies found during the site safety audit will be reviewed at the weekly Toolbox/Safety Meeting for corrective action and incident prevention.

It is Hudson Bay Insulation Company policy to have each employee inspects their tools daily prior to the beginning of work. Inspect all hand & power tools for defects. Defective tools will be tagged and taken out of service.

Hand Tools

- Always wear appropriate PPE when using power tools.
- The size or capacity of a tool should be matched to the requirements of the job.
- Steel measuring tapes shall not be used near electrical energized equipment.
- Hand tools shall be used for their intended purpose and not as a substitute for the proper tool required for the job.

Power Tools

- Task lights shall be equipped with bulb guards.
- Do not lift or lower portable electric tools by means of the power cord; use a hand line. Likewise, never throw tools, equipment, or materials up or down from one working level to another; always use a hand line or a tool pouch.
- Keep cords of electrical equipment coiled when not in use. When in use, make sure cords are positioned to avoid being run over by vehicles or equipment.
- Portable electric tools shall
    - Be equipped with a ground wire permanently connected to the tool case/frame and a means for grounding the other ends.
    - Be connected to the power supply by means of a fully insulated isolating transformer.
    - Be of the "Double Insulated" type.
    - Be completely self-contained.
- Shut down machinery before cleaning, oiling or adjusting.
- When air or hydraulic lines are to be uncoupled, care should be taken to first shut off supply lines and drain off remaining pressure before uncoupling.
- No welding, burning, brazing, or other source of ignition should be applied to any enclosed tank or vessel, even if it contains some openings, until it has first been determined that no possibility of explosion exists, and that proper authority has been obtained from a foreman or field supervisor.

Powder Actuated Tools

Per WAC 296-155-36313 *"Only qualified operators shall operate tools"*. Tools shall be operated in strict accordance with the manufacturer's instruction.

- All individuals who use powder actuated tools must be trained in the operation for each tool. Documented training will be kept on file at Hudson Bay Insulation Company office.
- All operators are required to carry their certification card when using powder actuated tools.
- HBIC employees will ensure all powder actuated tools are tested and inspected daily before use. All defective tools or parts will be immediately removed from service.
- Tools will not be loaded until they are ready for use. The tool is to be unloaded immediately following use, or if the employee is going to break or lunch.
- Shot will be stored and disposed of in accordance with manufacturer specifications.
- Tools will not be used in hazardous conditions, such as explosive or flammable atmospheres.
- Tools shall have determinable means of varying power to perform the desired work.
- Each tool will be supplied with operator's instructions and service manual, power load chart, tool inspection record, service tools and accessories.
- Operators will always use appropriate PPE to include hearing protection, safety glasses or face shields and gloves.
- "Powder Actuated Tool in Use" signs will be posted in plain sight at all points of entry and exit.

SCOPE

Hudson Bay Insulation Company does not excavate earth; however, on occasion project scope may require work in excavated trenches. The purpose of this section is to ensure all employees have the information necessary to determine if conditions of a trench or excavation is safe to enter and perform work.

GENERAL

- Competent persons shall make daily inspections of excavations. If danger of cave-in exists, stop all work in the excavation until necessary precautions have been taken to safeguard the employees.
- Employees shall be provided with personal protective equipment such as hardhats, respirators, eye protectors, and hand and foot protection as required.
- Inspect excavations after rainstorms and provide additional protection if needed.
- Ladders spaced so that the worker does not have to travel more than twenty-five (25) feet will be used for access and shall extend at least 36 inches above grade.
- When the trench is less than 25 feet long, an alternate method of providing access is to slope the ends of the trench so a worker can walk out of both ends.
- All persons working in excavations regardless of depth shall wear hardhats.

SAFE WORK PRACTICES FOR UNDERGROUND OPERATIONS

- Find out where utility mains involved with your work are located and where the emergency shut-offs are. Make sure all utilities are field-located before you begin your work.
- Test and record all confined spaced for toxic and deadly gases, flammable vapors, and oxygen deficiency before entering.
- Be aware that vibrations from equipment or nearby traffic can “liquefy” soil and cause cave-ins.
- Make certain that the pipe is properly stored and handled: rolling pipe kills!
- Know what to do and who to contact in case of an emergency. Keep emergency telephone numbers on the Safety Bulletin Board or in the job box.
- Be alert when working near heavy equipment. The operator may not always see you.
- Wear personal protective equipment.
- Make sure that saws and other equipment have their proper guards in place.
- Keep electrical cords in good condition and out of water.
- Personally make sure that the power is off before cutting into any electrical line.
- Personally make sure that gas mains have been shut off, or located and adequately protected, before working near them.
- Be sure that your trench has the proper emergency exits at proper spacing. Be sure to use ladders for access.

Purpose

To minimize risk associated with motor vehicle operations by establishing a program to assure that owned, leased and non-owned motor vehicles operating during company business are in safe operating condition and are operated by competent, qualified operators in a safe manner.

Responsibilities

- Safety Director
  - Coordinates driver training and testing.
  - Monitors vehicle inspection and maintenance program.
  - Investigates all vehicle accidents.

- Human Resources
  - Policy and program development and review.
  - Driver screening, selection and collecting the necessary information and establishes and maintains a list of qualified drivers.
  - Overall program approval and support.
  - Review vehicle accident reports.

General

- The operation of motor vehicles is a small part of our business, however, with the operation of these vehicles comes a tremendous amount of responsibility for the safety of the driver, passengers, and the motoring public. Vehicle accidents account for needless injury and property damage. It is our intent to assure that only qualified, safe drivers operate company vehicles. Vehicle loss prevention is the responsibility of all management personnel, supervisors, and drivers.

- It is a requirement of Hudson Bay that all vehicles be maintained and operated in the safest possible manner. Each driver is responsible to ensure compliance with this requirement.

- Any person operating a company vehicle must comply with all Federal, State, and local laws and regulations which govern the operation of the vehicle.

- Each vehicle must be registered, licensed, and inspected as required by applicable state laws.

- Occupant restraint usage is required. Vehicle operators are responsible for utilization of occupant restraints for themselves and passengers.

- All vehicle accidents must be reported to the Safety Director or to John Hernandez immediately.

Driver Qualification

- All drivers must be at least eighteen (18) years of age.
- All drivers must possess a valid Driver's License; a copy of this license must be on file with Hudson Bay Insulation.
- All drivers must have a good driving record based on their personal Motor Vehicle Record.

Driver Regulations

- All drivers are required to wear seat belts while operating a company vehicle. Also, the driver is responsible to ensure that passengers wear their seat belts.
- Drivers shall obey all traffic rules, drive courteously and practice defensive driving techniques.
- Drivers shall maintain a valid Driver's License and shall not allow other employees to use their vehicle until they verify the employee has a valid Driver's License.
- Drivers shall notify management of:
    - Any change in Driver's License status including suspension, revocation, or restriction.
    - All accidents that occur in a company vehicle.
- No employee will possess a firearm in his or her vehicle.
- Drivers will not operate a company vehicle after having consumed alcohol and/or drugs, including legal drugs, which may impair their ability to operate the vehicle.

In Case of an Accident

- You must complete a Vehicle Accident report form for any accident involving a Hudson Bay Insulation Company vehicle; also, Local Law Enforcement officials will be called to report the accident. It is for your protection and for the protection of Hudson Bay Insulation Company.
- The following information must be obtained before leaving the scene. Complete the accident report through the HBIC LMS or, a plain piece of paper will do.
    - date & time of collision.
    - location of incident/accident.
    - what transpired.
    - name of other driver(s).
    - license number of vehicle(s) & driver(s).

  - insurance company, policy number, name & telephone number of agent.
  - any injuries with a description if possible.

- Take lots of pictures showing skid marks, damage and position of the vehicles involved, insurance documents, driver's licenses, and vehicle license plates.

- Call the Safety Director or Human Resources as soon as possible to report information.

There are many hazardous chemicals in wildfire smoke, the main harmful pollutant for people who are not very close to the fire is "particulate matter," the tiny particles suspended in the air. The particles of concern are identified as “PM2.5”.

Breathing in the “particulate matter” can lead to a range of health problems including:

- Persistent coughing
- Difficulty breathing
- Heart Failure
- Phlegm
- Aggravated Asthma
- Reduced lung function
- Wheezing
- Bronchitis
- Death

In accordance with WAC 296-62-085, the following policy is designed to protect employees who may be exposed to harmful wildfire smoke.

The following workplaces and operations are exempt from this section:

- Enclosed buildings or structures in which the employer ensures that windows, doors, bays, and other exterior openings are kept closed, except when it is necessary to open doors to enter and exit.

- Enclosed vehicles in which the air is filtered by a cabin air filter and the employer ensures that windows, doors, and other openings are kept closed except when it is necessary to open doors to enter or exit.

- Employees exposed to a concentration of NowCast PM2.5 of 20.5µg/m3 (NowCast Washington Air Quality Advisory 101, NowCast Air Quality Index 69) or more for a total of one hour or less during a shift.

Definitions

- ***Air Quality Index (AQI) -*** A unitless index used by the U.S. Environmental Protection Agency (EPA) to communicate air quality for several pollutants, including PM2.5.

- ***Current PM2.5*** - The concentration of PM2.5 for the most current hour available, calculated using an hourly average of PM2.5 data

- ***NIOSH*** – The National Institute for Occupational Safety and Health of the U.S. Centers for Disease Control and Prevention.

- ***NowCast Air Quality Index (AQI)*** - The method used by the U.S. Environmental Protection Agency (EPA) to communicate air quality using color-coded categories. It shows the air quality for the most current hour available by using a calculation that involves multiple hours of past data using the NowCast. The NowCast uses longer averages during periods of stable air quality and shorter averages when air quality is changing rapidly, such as during a wildfire. The NowCast is generally updated every hour.

- ***NowCast PM2.5 -*** The concentration of PM2.5 for the most current hour available by using a calculation that involves multiple hours of past data using the NowCast. The NowCast uses longer averages during periods of stable air quality and shorter averages when air quality is changing rapidly, such as during a wildfire. The NowCast is generally updated every hour.

- ***NowCast Washington Air Quality Advisory (WAQA) -*** The method used by the Washington state department of ecology to communicate air quality using color-coded categories. It shows the air quality for the most current hour available by using a calculation that involves multiple hours of past data using the NowCast. The NowCast uses longer averages during periods of stable air quality and shorter averages when air quality is changing rapidly, such as during a wildfire. The NowCast is generally updated every hour.

- ***PM2.5 -*** Solid particles and liquid droplets suspended in air, known as particulate matter, with an aerodynamic diameter of 2.5 micrometers or smaller. Measured in micrograms per cubic meter (µg/m3).

- ***Sensitive groups -*** Some workers may experience health effects at NowCast PM2.5 levels of 20.5 µg/m3 (WAQA 101, AQI 69) or lower especially if they belong to a sensitive group.

  People with preexisting health conditions and those who are sensitive to air pollution are among those most likely to experience health problems from exposure to wildfire smoke. Examples of sensitive groups include:

  - People with lung diseases such as asthma or chronic obstructive pulmonary disease (COPD), including bronchitis and emphysema, and those who smoke;

  - People with respiratory infections, such as pneumonia, acute bronchitis, bronchiolitis, colds, flu, or those with, or recovering from COVID-19;

  - People with existing heart or circulatory problems, such as irregular heartbeat, congestive heart failure, coronary artery disease, angina, and those who have had a heart attack or stroke.

  - Children under eighteen years old, and adults over age sixty-five;

  - Pregnant women;

  - People with diabetes;

  - People with other medical or health conditions which can be exacerbated by exposure to wildfire smoke as determined by a physician.

- ***Wildfire Smoke*** – Emissions from fires in wildlands or in adjacent developed areas. Wildfire smoke contains a complex mixture of gases and particulates. Fine particulates such as PM2.5 are the primary pollutant in wildfire smoke.

- ***Wildlands*** - Sparsely populated geographical areas covered primarily by grass, brush, trees, crops, or combination thereof.

Identification of Harmful Exposures.

The following sources shall be used to determine the exposure to PM2.5 before each shift and periodically thereafter, as needed to protect the health of employees.

- **NowCast PM2.5 –** available at U.S. Forest Service AirFire website, https://www.fs.fed.us/air/smoke.htm

- **AirNow AQI –** available at U.S. EPA AirNow website, https://www.airnow.gov/ , or the EPA AirNow mobile app.

- **NowCast WAQA –** available at Washington Air Quality Monitoring Network website, https://enviwa.ecology.wa.gov/home/map

- **Washington Smoke Information** website, https://wasmoke.blogspot.com/

    - If the NowCast AQI are used, the following table must be used to find the equivalent AQI for PM2.5.

PM2.5 in Micrograms per Cubic Meter (µg/m3)	Air Quality Index (AQI) for PM2.5
20.5 µg/m3	69
35.5 µg/m3	101

Air Quality Monitoring and Communication

The superintendent, foreman and the project manager will determine the air quality exposure to PM2.5 before each shift using one of the methods listed in WAC 296-62-08530.

Communication of wildfire smoke hazards of PM2.5 is 20.5 µg/m3 (WAQA 101, AQI 69) or more, as needed via toolbox talks, text, email, or verbal communication via telephonic methods.

Employees are encouraged to inform Hudson Bay Insulation of:

- Worsening air quality; and

- Availability issues of appropriate exposure control measures or respiratory protection devices; and
- Any adverse symptoms that may result of wildfire smoke exposure such as asthma attacks, difficulty breathing and chest pain.

Exposure Controls

Where the NowCast PM2.5 is 20.5 5µg/m3 (WAQA 101, AQI 69) or more the following exposure controls will be implemented where feasible:

- Relocating work to a location where the air is filtered.
- Changing work schedules to a time with a lower ambient air concentration of PM2.5;
- Reducing work times in areas with unfiltered air;
- Reducing work intensity to help lower the breathing & heart rates;
- Increasing rest times and frequency in a rest area with filtered air

The following table represents the action levels that will be followed when a health warning has been issued for hazardous air quality.

Daily AQI Color	Levels of Concern	Value of Index	Description of Air Quality	Action Item
Green	Good	0-50	Air quality is satisfactory.	No action needed
Yellow	Moderate	51-100	Air quality is acceptable.	Educate teams and provide N95, KN95 filtering facepiece respirator for voluntary use.
Orange	Unhealthy for Sensitive Groups	101-150	Members of sensitive groups may experience health effects.	Highly encourage employees to use a N95, KN95 filtering facepiece respirators. Follow exposure controls.
Red	Unhealthy	151-200	Some members of the general public may experience health effects.	Limit outdoor work and provide N95, KN95 filtering facepiece respirator for voluntary use.
Purple	Very Unhealthy	201-300	Health Alert: The risk of health effects is increased for everyone.	Work indoors only. Anticipate potential for job site shutdowns.
Maroon	Hazardous	301-500	Health warning for emergency conditions: everyone is more likely to be affected.	Ensure safety and health of employees and shutdown the jobsite if hazards cannot be controlled.

Respiratory Protection

Respirators are highly effective in reducing the respiratory hazards associated with wildfire smoke when they are properly selected and worn.

Surgical masks or items worn over the nose and mouth such as scarves, t-shirts, and bandanas will not provide protection against wildfire smoke. A N95 filtering face-piece respirator is the minimum level of protection for wildfire smoke.

KN95 respirators may also be worn if an adequate supply of NIOSH approved respirators are not available.

- Employees are encouraged to voluntarily wear a N95 or KN95 respirator where the NowCast PM2.5 is 20.5 µg/m3 (AQI 69) or higher.
- Employees are highly encouraged to voluntarily wear a N95 or KN95 respirator where the NowCast PM2.5 is 35.5µg/m3 (AQI 101) or higher.
- All respirators will be provided by Hudson Bay Insulation Company.
- All respirators shall be used properly and kept clean per the manufacturer's instructions.

For voluntary use of filtering facepiece respirators, such as N95 respirators, the requirements of WAC 296-842, Safety Standards for Respirator, do not apply, such as fit testing and medical evaluations. If elastomeric respirators are used voluntarily, additional requirements for WAC 296-842, Respirators apply such as medical evaluations and fit testing will be required.

How to properly put on, use and maintain the N95 or KN95 respirator.

- Place the mask over the nose and under the chin, with one strap placed below the ears and one strap above.
- Pinch the metal part (if applicable) of the respirator over the top of the nose so it fits securely.
- Perform a seal check:
    - Cover the respirator with both hands and exhale. If air leaks where the respirator seals against the face, readjust the respirator and nosepiece and try again. When a proper fit is achieved, the respirator should bulge from the face and not leak around the seal.
    - Cover the respirator with both hands and inhale. If air leaks where the respirator seals against the face, readjust the respirator and nosepiece and try again. When a proper fit is achieved, the respirator should collapse slightly and not leak around the seal.

Definition of Workplace Violence

Workplace violence can be described in several different ways; physical attacks or assaults, threats, harassment; both verbal and sexual, vandalism and arson. Internal violence takes place within the organization and external violence comes from outside the organization (i.e., robberies).

Hudson Bay Insulation Company is committed to preventing workplace violence and to maintaining a safe work environment and the cooperation of all employees is expected. Absolutely no violence, threats of violence, veiled threats, or weapons of any kind, will be tolerated in the workplace.

Company policies strive to provide a professional workplace, free of all types of harassment. All employees of Hudson Bay Insulation Company should always treat each other with courtesy and respect. Employees are expected to refrain from fighting, "horseplay", or other conduct that may be dangerous or intimidating to others.

Conduct that threatens, intimidates, or coerces another employee, a customer or a member of the public at any time, including during off-duty periods, will not be tolerated. Hudson Bay strictly prohibits discrimination or harassment that is sexual in nature and/or discrimination or harassment that is based upon race, color, national origin, religion/creed, sex, sexual orientation, gender identity, age, disability, or other basis protected by local, state and federal laws.

Warning signs of workplace violence can be any of the following:

- Threats.
- Change in attitudes or work patterns.
- Bizarre behavior.
- Alcohol/drug abuse on the job.

Prevention of Workplace Violence

- Practice personal safety, keep valuables out of sight, and lock car doors, report 'strange' or suspicious looking persons or persons acting strangely.
- Respect the rights of fellow employees and clients. 'Teasing' in the workplace should be kept at a minimum. 'Hazing' is unacceptable at any time.
- Report threats of any kind to your supervisor and to Greg Zevely at (206) 763-9484. Every report of a threat will be confidential but will be documented and treated seriously.

- When reporting a threat, document who made the threat, what was the threat, when the threat was made and where did the threat occur.

- Hudson Bay Insulation Company will not condone any type of violence caused by employees of this organization. Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines will be subject to prompt corrective action up to and including termination of employment.

Should Workplace Violence Occur

If there is a fight or assault with no apparent weapon, get help to stop the incident, get the names of the persons involved and, if any of the parties are unknown, get a description of them, including sex, race, age, height, weight, hair color, eye color, clothing, any distinguishing characteristics, and a complete description of any vehicle, including the make, model, year, license number and particular characteristics. Try to jot down as much information as possible before discussing the incident with anyone else.

For fights and/or assaults in which there is a gun, or another weapon involved, get to a safe place and call 911. Carefully and as accurately as possible, describe the act and the attacker. Again, write down as many details as possible before talking to anyone other than law enforcement officials.

If you arrive at a scene where violence has occurred

- Do not change anything at the scene.

- Do not clean up, reset furniture, or touch any objects that may have been handled by the attacker.

In the event of rape, do not wash yourself or change clothes until examined by a doctor.

Hudson Bay Insulation Company will encourage employees to bring their disputes or differences with other employees to the attention of Human Resources before the situation escalates into potential violence. Hudson Bay Insulation Co. is eager to assist in the resolution of employee disputes and will not discipline employees for raising such concerns. In addition, retaliation is strictly prohibited and no one who raises a concern, brings a complaint, or participates in an investigation will be retaliated against for those actions.

FORMS

HUDSON BAY® INSULATION

Energy Efficiency Specialists™

PRE-TASK PLAN

The supervisor and crew will create this plan establishing safe work practices and common hazard control measures for preventing the occurrence of injuries.

Job Information

Job Name: _____ Location of Work: _____

Task Description: _____

Start Date/Time: _____ _____ End Date/Time: _____ _____

Foreman: _____ Phone: _____ Crew Size: _____

Work Task & Environment Evaluation

	Yes	No
- Is every crew member orientated to the site and familiar with the work	☐	☐
- Has the work area been walked by the crew to identify safety and/or impact	☐	☐
- Will the task require special permits or plans? *(i.e. confined space entry, hot work,*	☐	☐
- Will the task involve exposure to falls of 4' or greater?	☐	☐
- Will barricading and or signage be required to protect personnel, facilities, or	☐	☐
- Will the task require the use of ladders, MEWPs, scaffolds or work platforms?	☐	☐
- Will the task require the LOTO of energized systems?	☐	☐
- Will the task involve the use of chemicals? If so, has an SDS been reviewed to	☐	☐
- Will the task involve exposure to high noise levels greater than 85 dBA?	☐	☐
- Will the task involve musculoskeletal/ergonomic risk factors? *(i.e. repetetive*	☐	☐
- Will weather conditions effect the safe completion of the task?	☐	☐
- Will the task require additional coordination with other crafts in the work area?	☐	☐
- Have all tools & equipment been inspected for safe use prior to starting work	☐	☐
- Has emergency equipment been identified & located? *(i.e. fire extinguishers,*	☐	☐
- What is the evacuation route and _____		

	Steps of the Task		Hazards of the Task		Hazard Control Methods
1.		1.		1.	
2.		2.		2.	
3.		3.		3.	
4.		4.		4.	
5.		5.		5.	

Use the back of this form to list any additional steps and other information.

Personal Protective Equipment

☐ Hard Hat ☐ Safety ☐ Face Shield ☐ Gloves – Cut Level 3 ☐ High Vis
☐ Kevlar ☐ Respirator ☐ Full Body ☐ Hearing Protection ☐ _____

Signatures

By signing below, I acknowledge that I participated in the creation of this pre-task plan and understand the steps of the task, associated hazards, and hazard control methods.

Foreman Signature: _____ Date: _____

Crew Printed Name:	Crew Signature:	Crew Printed Name:	Crew Signature:

Signatures

By signing below, I acknowledge that I participated in the creation of this pre-task plan and understand the steps of the task, associated hazards, and hazard control methods.

Crew Printed Name:	Crew Signature:	Crew Printed Name:	Crew Signature:

	Steps of the Task		Hazards of the Task		Hazard Control Methods
6.		6.		6.	
7.		7.		7.	
8.		8.		8.	
9.		9.		9.	
10.		10.		10.	

Pre-Task Plan Revisions

Describe the deviations from the original pre-task plan and detail the revised hazard control methods.

		Crew Initials
R1		
R2		
R3		

Notes

If work conditions change, work ***MUST STOP*** and the Pre-Task Plan must be revised.

HUDSON BAY® INSULATION
Energy Efficiency Specialists™

Tool Box Talk/Safety Meeting

Sign In Sheet

Email to chris@hudsonbayins.com or safety@hudsonbayins.com or text to (206) 730-6273

Topic: _____ Date: _____

Discussion Leader: _____ Job Name: _____

	Employee Name	Employee Signature
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		

Employee Comments, Concerns, Suggestions or Recommendations to improve workplace safety & health:

_____

_____

_____

Please submit this document immediately upon completion of the meeting to the safety department and retain the original copy of this document in the Safety & Risk Management Plan

MEWP PRE-USE INSPECTION CHECKLIST

INSPECTIONS ARE TO BE CONDUCTED PRIOR TO EACH USE AND IN ACCORDANCE WITH THE MANUFACTURER'S INSTRUCTIONS.

MEWP Make & Model _____

MEWP Type

- ☐ Type 1 – *travels in only stowed*
- ☐ Type 2 – *chassis controls only*
- ☐ Type 3 – *both chassis & platform controls*

MEWP Group

- ☐ Group A - *Scissor*
- ☐ Group B - *Boom*

POWER OFF INSPECTION
Wheels & Tires – *general condition & wear*
Engine & Power Source – *fluid level, leaks, belt & hoses, debris*
Hydraulic System – *hoses, fittings, fluid reservoir & cylinders*
Electrical System – *batteries, cables & connections tight, clean*
Accessory Plugs & Charging Cable – *present, general condition*
Outriggers & Stabilizers – *general condition & wear*
Chassis – *general condition & wear*
Counterweight & Counterweight Bolts - *present*
Platform – *guardrails, toe boards, anchorages & gates*
Boom & Lift Arms – *general condition & wear*
Weather-resistant storage compartment - *present*
Decals, Warnings, Data & Capacity Plates – *present & legible*
Operators' Manual – *present & legible*

POWER ON INSPECTION
Unit starts & runs properly
Warning Lights, Horn & Audible Alarms – *operational*
Fuel or Charge level
Function Controls – *raise, lower, extend, retract, rotate, tilt*
Function Controls – *drive forward & reverse, steer right & left,*
Function Controls – *brakes stop & hold*
Stability Enhancing Devices – *operates properly*
Function-enabled (deadman) Devices – *operates properly*
Emergency Lowering or Auxiliary Controls – *operates properly*
Safety Interlocks – *operates properly*

WORKPLACE INSPECTION
Drop-offs & Potholes
Bumps & Floor / Ground Obstructions
Debris
Overhead Obstructions
Energized Power Lines
Hazardous Locations
Ground Surface & Support Conditions
Pedestrian / Vehicle Traffic
Wind & Weather Conditions

INSPECTION RECORD

REPORT ANY PROBLEMS TO YOUR SUPERVISOR IMMEADIATLY. ALWAYS LOCK & TAGOUT UNSAFE EQUIPMENT.

DATE	BY	DATE	BY

HUDSON BAY INSULATION
Energy Efficiency Specialists™

LADDER INSPECTION CHECKLIST

INSPECTIONS ARE TO BE CONDUCTED PRIOR TO EACH USE AND IN ACCORDANCE WITH THE MANUFACTURER'S INSTRUCTIONS.

LADDER TYPE

☐ Step Ladder ☐ Extension
☐ Podium/Platform Ladder ☐ Straight Ladder
☐ Articulated Ladder *(Little* ☐
*Lean Safe ☐ YES ☐ NO

LADDER HEIGHT

☐ 4′ ☐ 6′ ☐ 8′ ☐ 10′ ☐ 12′ ☐ 14′
☐ 16 ☐ 20 ☐ 24 ☐ 28′ ☐ 32′ ☐ ______

LADDER DUTY RATING

☐ Type 1 Heavy Duty *(250 lbs.)*
☐ Type 1A Extra Heavy Duty (*300 lbs.)*
☐ Type 1AA Extra Heavy Duty *(375 lbs.)*

INSPECTION ITEMS

Labels – *present and clearly legible*
Side Rails – *not cracked, bent, split, frayed, or excessively discolored*
Steps/Rungs – *not loose, cracked, bent, or missing*
Footpads – *not excessively worn, missing or damaged*
Rivets – *not rusted, corroded, loose, or missing*
Spreader Bars – *not loose, bent, missing, or broken*
Bracing Front/Rear – *not loose, bent, broken, or missing*
Fasteners/Hardware – *not loose, missing or broken*
Top Cap – *not loose, cracked, missing, or broken*
Platform – *not loose, bent, missing, or broken*
Hinges – *not loose, bent, missing, or broken*
Shoes – *not excessively worn, missing or damaged*
Rope/Pulley – *not missing, broken, or frayed*
Rung Locks – *not loose, bent, missing, or broken*
General – *not wobbly or uneven, free of tape, mastic, and caulking*

ACTIONS

☐ Ladder **PASSED** inspection and is serviceable.
☐ Ladder **FAILED** inspection, tagged, & removed from service.

COMMENTS

INSPECTION RECORD

REPORT ANY PROBLEMS TO YOUR SUPERVISOR IMMEADIATLY.
ALWAYS LOCK & TAGOUT UNSAFE EQUIPMENT.

DATE	BY	DATE	BY

Assured Grounding Program Log Sheet

Employer: Hudson Bay Insulation Company

Name or location of construction site: _____

_____

Person to implement program: _____

Identify date of test in appropriate column:

Item & I.D.	1st QTR	2nd QTR	3rd QTR	4th QTR	
Code	Test - Code	Test - Code	Test - Code	Test - Code	

Confined Space Entry

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Confined Space Evaluation Form

NOTE TO ENTRY SUPERVISOR: Starting at the top of form, document your process by marking the appropriate check box and initialing. Once complete, turn in to HBI project supt., or his designee, for review and approval. Form to be filed at jobsite.

Date/Time:	Entry Supervisor Name:
Job Site:	Area:

START HERE

Is the space large enough and so configured that an employee can bodily enter it and perform work?
- **No** ☐ INT. _____ → **This IS NOT a Confined Space** — Supervisor: _____ HBI: _____
- **Yes** ☐ INT. _____

Does the space have a limited or restricted means of access and egress (i.e. tanks, vessels, silos, storage bins, hoppers, vaults, pits, walkable ceiling spaces, raised floors, building foundations)?
- **No** ☐ INT. _____ → **This IS NOT a Confined Space** — Supervisor: _____ HBI: _____
- **Yes** ☐ INT. _____

Is the space designed for continuous human occupancy?
- **Yes** ☐ INT. _____ → **This is a Full-Permit Required Confined Space** (**Complete Full-Permit Form Prior to Entry**) — Supervisor: _____ HBI: _____
- **No** ☐ INT. _____

This is a Confined Space

Continue

Does the space contain material that has the potential to engulf an entrant?
- **Yes** ☐ INT. _____ → **This is a Full-Permit Required Confined Space** (**Complete Full-Permit Form Prior to Entry**) — Supervisor: _____ HBI: _____
- **No** ☐ INT. _____

Does the space have an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a small cross-section?
- **Yes** ☐ INT. _____ → **This is an Alternative Method Confined Space** (**Complete Alternate Entry Permit Prior to Entry**) ***Outside attendant/rescue plan not required*** — Supervisor: _____ HBI: _____
- **No** ☐ INT. _____

Does this space contain any other recognized serious safety or health hazards (i.e. exposed energized electrical, live open piping/storm/sewer, mech. paddles/mixers or other forms of hazardous energy)?
- **No** ☐ INT. _____
- **Yes** ☐ INT. _____

Can physical hazards be eliminated from outside the confined space (i.e. lockout/tagout, blocking, blinding)?
- **No** ☐ INT. _____ → **This is a Non-Permit Required Confined Space** — Supervisor: _____ HBI: _____
- **Yes** ☐ INT. _____

Does the space contain, or have the potential to contain, a hazardous atmosphere due to existing condition or scope of work being performed?
- **Yes** ☐ INT. _____ → Is continuous forced air ventilation and continuous air monitoring alone sufficient to maintain the space safe for entry?
  - **Yes** ☐ INT. _____ → **This is an Alternative Method Confined Space** (**Complete Alternate Entry Permit Prior to Entry**) ***Outside attendant/rescue plan not required*** — Supervisor: _____ HBI: _____
  - **No** ☐ INT. _____ → **This is a Non-Permit Required Confined Space** — Supervisor: _____ HBI: _____
- **No** ☐ INT. _____

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Confined Space Entry Permit

This permit is to be posted at the entry site
and taken down at completion of work or shift.

Job Name: _____ Job Number: _____

Type of Entry: ○ Permit Required Confined Space ○ Alternative Methods Confined Space

Location of Confined Space: _____

Task(s) to be Completed: _____

Space Description: _____

Authorized Permit Duration: Start Date & Time: _____ End Date & Time: _____

Entry Supervisor _____ Title: _____

Authorized Entrant(s): _____

HAZARDS INHERENT TO THE SPACE		HAZARD(S) INTRODUCED TO THE SPACE
○ Outside Space	○ Heat / Cold	○ Paints / Sealants / Caulk
○ Space Access	○ Slips / Falls	○ Cleaning Chemicals
○ Atmospheric	○ Lighting	○ Solvents
○ Natural Gas Lines	○ Biological	○ Corrosives
○ Sewer Lines	○ Entrapment	○ Heat
○ Water Lines	○ Engulfment	○ Grinding
○ Electrical	○ Fire	○ Sanding
○ Configuration	○ Explosion	○ Welding / Cutting
○ Chemical	○	○ Tools that may Spark
Other:		Other:

Acceptable Entry Conditions			
1. Affected Departments and/or Personnel Notified?	N/A	Yes	No
Departments that were notified:			
2. Confined Space Perimeter Setup and Secure?	N/A	Yes	No
3. Atmospheric Testing?	N/A	Yes	No

Air Monitoring	Acceptable Limits	Prior to Ventilation	After Ventilation	Reading/ Time	Reading / Time	Reading/ Time	Reading/ Time	Reading/ Time	Reading/ Time
O2	19.5-23.5%								
% LEL	<10%								
CO	<25 PPM								
H2S	<10 PPM								
Other	<PEL/TLV								

Tested By: Meter ID: Last Calibration Date:

4. Lockout Tagout of Hazardous Energy Sources Prior to entry	N/A	Yes	No
5. Space Ventilation			
Ventilation Equipment Used: Fan ID: Fan CFM Other:			
6. Communication Method ○ Radio ○ Voice ○ Visual ○ Cell Other:			
7. Lighting	N/A	Yes	No
8. PPE Required	N/A	Yes	No
○ Hard Hat ○ Safety Glasses ○ High Visibility ○ Gloves Other:			
9. Other Permits Attached (i.e., LOTO Checklist and Hot Work Permit)	N/A	Yes	No
10. Rescue			
Rescue Equipment	N/A	Yes	No
Rescue Equipment Used:			
Rescue and Emergency Services Available	N/A	Yes	No
Rescue and Emergency Services Used:			
*When using 3rd party rescue services; provide additional contact information and rescue plan to this permit			

Equipment List	
○ Ventilation Fan and Venting	○ Ladder or other Access Equipment
○ Extension Cord	○ Tools for the Job
○ Tripod with Winch and Lifeline/ Harness	○ Fire Extinguisher
○ Radio	○ First Aid Kit
○ Lighting	○ Barriers
○ 4-Gas Meter	○
Other Equipment:	

Supervisors Signature:			
Attendants:			
Entrants:			

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Coaching/Corrective Record

Employee Name: _____ Date: _____

Date of Occurrence: _____ Project: _____ Union: _____

ACTION TAKEN

☐ Coaching ☐ Verbal Warning ☐ Written Warning

Note: Coaching is not considered a level of formal corrective action

☐ Suspension _____ day(s) ☐ Termination ☐ Other: _____

(Depending on the nature of the offense, Hudson Bay Insulation reserves the right to skip any steps at its discretion.)

DESCRIPTION OF DISCUSSION

☐ Absenteeism ☐ Tardiness ☐ Leaving Early ☐ Safety Violation

☐ Policy and/or Procedure Violation ☐ Conduct ☐ Unsatisfactory Job Performance

☐ Other: _____

EXPLANATION

_____

_____

_____

GOALS/CORRECTIVE BEHAVIOR _____

_____

TO BE COMPLETED BY SUPERINTENDENT OR OFFICE MANAGER

Should your performance and/or behavior become and/or continue to be unacceptable in the above area(s), the company will find it necessary to take the following corrective action (or more depending on the situation):

☐ Verbal Warning ☐ Written Warning ☐ Suspension _____ day(s)

☐ Termination ☐ Other: _____

EMPLOYEE COMMENTS

_____

_____

_____

Failure to correct and/or meet and sustain acceptable performance and/or behavior or further violation of company policy will result in additional formal corrective action up to and including discharge. By signing below, you the employee acknowledge that this information has been discussed with you and you have been provided with a copy.

Employee Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Witness Signature: _____ Date: _____

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Fall Protection Work Plan

Employees must review and adhere to the requirements of this fall protection work plan for the duration of work activities.

Job Name: _____ Date: _____

Job Location Description: _____

Task(s) to Be Completed: _____

Competent Person(s): _____

Fall Hazards

*Select **all** existing or potential hazards associated with work task(s) where a fall would exceed 4'.*

- ☐ Leading Edge(s)
- ☐ MEWP (scissor / boom)
- ☐ Ladder(s)
- ☐ Floor Openings
- ☐ Wall Openings
- ☐ Shaft Openings
- ☐ Scaffold
- ☐ Hazardous Process / Equipment
- ☐ Stairway(s)
- ☐ Other (Specify): _____

Fall Protection System to Be Used

*Select **all** components of the Personal Fall Arrest or Personal Fall Restraint System to be used.*

- ☐ Full Body Harness
- ☐ Safety Monitor
- ☐ Restraint / Warning Line
- ☐ Self-Retracting Lifeline
- ☐ Horizontal Lifeline
- ☐ Lifeline / Static Line
- ☐ Shock Absorbing Lanyard
- ☐ Rope Grab
- ☐ MEWP (scissor / boom)
- ☐ Positioning Lanyard
- ☐ Safety Nets
- ☐ Scaffold with Guardrail
- ☐ Guardrail System
- ☐ Other (Specify): _____

Inspection & Maintenance of Fall Protection System

Describe the procedures for the inspection and maintenance of the fall protection system to be used.

All equipment will be visually inspected daily and prior to each use in accordance with the manufacturer's recommended instructions. If the inspection reveals any deficiencies, the equipment will be immediately tagged, removed from service, and replaced with serviceable equipment. All maintenance will be done in accordance with the manufacturer's recommended procedures.

Assembly & Disassembly of Fall Protection System

Describe the procedures for the assembly and disassembly of the fall protection system to be used.

Handling, Storage and Securing of Tools and Materials

Describe the method for handling, storing and security of tools, equipment, and materials.

All elevated work locations where tools, equipment, and materials are being utilized or stored shall be properly protected to eliminate the risk of falling to adjacent levels. All tools and equipment shall be secured in a lockable gang box at the end of each shift prior to departing for the day.

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Method(s) of Overhead Protection

*Select **all** methods of overhead protection for workers who may be in or pass through the area below the worksite.*

☐ Delineation / Barricading ☐ Warning Signs ☐ Tool Lanyards ☐ Toe boards

☐ Safety Helmet ☐ Other (Specify): _____

Fallen Worker Rescue Plan

*In the event of a fall from height, the fallen worker will first attempt to perform self-rescue. The supervisor will immediately alert HBI rescue and first aid teams. If the rescue team cannot perform a **rescue within 3 minutes** the Jobsite Contact and Emergency Services are to be called immediately.*

Emergency Phone Number: _____ or _____

Rescue Team: _____

First Aid Team: _____

Jobsite Contact: _____

Name *Number* *Company*

Rescue Equipment

*Select **all** equipment that will be needed to assist in the aid and rescue of a fallen worker.*

☐ Ladder ☐ MEWP (scissor/boom) ☐ Rescue Rope ☐ Rescue Pole

☐ Suspension Trauma Straps ☐ Alternative Lifting & Lowering Device

☐ First Aid Kit ☐ AED ☐ Stretcher ☐ Life Ring

☐ Other (Specify): _____ Location of Equipment: _____

Communication or Method of Contact

*Select **all** communication methods that will be used between the fallen worker and rescue team.*

☐ Direct Voice ☐ Mobile Phone / Number: _____

☐ Radio / Channel: _____ ☐ Other (Specify): _____

Rescue Procedures

Describe the tasks that will be done prior to starting work and the step-by-step process to be followed after a fall has occurred.

Pre-Work Tasks:

1) Identify rescue & first aid team(s).
2) Inspect work area.
3) Identify additional access / anchor points.
4) Inspect and stage rescue equipment.
5) Review rescue plan with crew.
6) Coordinate rescue plan with jobsite contact.

Response Procedures:

1) Make medical assessment of worker.
2) If possible, have worker perform self-rescue.
3) If unable, notify rescue & first aid team(s).
4) Notify jobsite contact & call 911 or _____.
5) Assist emergency responders.
6) Notify Hudson Bay Insulation safety team.

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Special Consideration & Coordination

Describe in detail any special considerations or coordination that will aid in the rescue of a fallen worker, (i.e., anchor points, landing area, rescue obstructions or hazards, working alone, weather, etc.)

Employee Acknowledgement of Fall Protection Training

All employees are to adhere to the Fall Protection procedures that are set forth in the HBIC Safety & Risk Management Plan. All employees shall have been trained by a qualified competent person; the training shall consist of a review of the fall protection work plan and the proper use of fall protection equipment before work is to begin. Copies of this form are to be turned into the HBIC Safety Department and maintained at the jobsite.

Name	Signature	Date

List additional names on the back of this sheet

Approvals

Fall Protection Work Plan Completed By: _____

Submitted _____ Date: _____

Approved By: _____ Date: _____

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Employee Incident Report

To be completed and signed by the injured worker, reviewed and signed by the supervisor, and sent to the Safety Department. Use this form for near-miss incidents also.

Must be submitted within 2 Hours

Incident Information

Employee Name: _____ Job Name: _____

Supervisor: _____ Place of Incident: _____

Date of Incident: _____ Time of Incident: _____ am / pm

Type of Incident: ☐ Near Miss ☐ Injury ☐ Illness ☐ Damage – Property Material Equip.

Nature of Injury

☐ Strain/Sprain	☐ Laceration/Cut	☐ Burn/Scald	☐ Other	Injured Part of Body:
☐ Fracture	☐ Scratch/Abrasion	☐ Impalement	_____	
☐ Bruising	☐ Puncture	☐ Chemical Reaction	_____	
☐ Internal	☐ Amputation	☐ Foreign Body		

Medical Treatment

☐ No Treatment ☐ First Aid ☐ Urgent Care Clinic ☐ ER / Hospital ☐ Other: _____

Incident Description

Describe what happened (Who, What, Where, When, Why & How). Be specific and detailed

Incident Factors

What was most likely the cause related to the incident? (object, material, equipment, conditions)

Did an unsafe act by yourself or other contribute to the accident? (be specific)

Did personal factors contribute to the incident? (lack of knowledge, skill, experience, distraction, lack of training, fatigue)

Was the hazard discussed in the pre-task planning meeting? If no, explain.

Was PPE Required? YES NO Was the correct PPE in use? YES NO If YES: List the PPE If NO: Explain

Was the employee following safety procedures when the incident happened? YES NO If NO: Explain

How could this incident have been avoided?

List all witnesses:

	Print Name	Signature	Date:
Employee			
Supervisor			

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Witness Incident Statement

To be completed by all witnesses and sent to the Safety Department.

Must be submitted within 2 Hours

Incident Information

Witness Name: _____ Job Name: _____

Supervisor : _____ Place of Incident: _____

Date of Incident: _____ Time of Incident: _____ am / pm

Incident Description

Describe what happened. Be specific and detailed.

The facts as I have stated them are true to the best of my knowledge.

	Print Name	Signature	Date:
Employee			

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Incident Investigation Report

To be completed by the Safety Director, Foreman, Superintendent and Project Manager.
To be completed for major incidents, including all recordable injuries and major near misses.

Incident Information

Employee Name: _____ Job Name: _____

Supervisor: _____ Place of Incident: _____

Date of Incident: _____ Time of Incident: _____ am / pm

Date Incident Reported: _____ Time Incident Reported: _____ am / pm

Type of Incident: ☐ Near Miss ☐ Injury ☐ Illness ☐ Damage – Property Material Equip.

Injury & Medical Treatment

Injured Part of Body: _____ Diagnosis of Injury: _____

Treatment ☐ No Treatment ☐ First Aid ☐ Urgent Care Clinic ☐ ER / Hospital ☐ Other: _____

Results of Injury: ☐ Released to Full Duty ☐ Light/Modified Duty ☐ NOT released to any work ☐ Lost Time

Incident Description

Describe what happened (Who, What, Where, When, Why & How). Be specific and detailed

Contributing Factors — Check all that apply

	Unsafe Acts		*Unsafe Conditions*		*Management Deficiencies*
☐	Improper PPE or PPE not used	☐	Congested work area	☐	Lack of written procedures/policies
☐	Safety rule violation	☐	Inadequate ventilation	☐	Safety rules not enforced
☐	By-passing safety devices	☐	Improper material storage	☐	Hazards not identified
☐	Guards not used	☐	Improper tool or equipment	☐	PPE unavailable
☐	Operating without authority	☐	Insufficient knowledge of job	☐	Insufficient employee training
☐	Improper lifting	☐	Poor housekeeping	☐	Insufficient supervisor training
☐	Improper loading or placement	☐	Poor work area design or layout	☐	Inadequate job planning
☐	Failure to warn or secure	☐	Inadequate fall protection	☐	Poor access, housekeeping
☐	Horseplay	☐	Inadequate lighting	☐	Other:
☐	Improper work technique	☐	Inadequate guarding of hazards	☐	
☐	Fatigue/lack of focus	☐	Slippery conditions	☐	
☐	Other:	☐	Other:	☐	

Must be submitted within 2 Hours

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Incident Investigation Report

To be completed by the Safety Director, Foreman, Superintendent and Project Manager.
To be completed for major incidents, including all recordable injuries and major near misses.

Must be submitted within 2 Hours

Incident Analysis – Explain the cause(s) of the incident detail

Can the employee's actions or failure to perform a duty be completely discounted as a contributing factor to the incident/accident?
☐ Yes ☐ No

Note: If you answered "Yes" to the above question, post-accident drug testing is NOT required.

Was corrective action taken? ☐ YES ☐ NO	If YES, what was the action? If NO, why not?
How bad could the accident have been? ☐ very serious ☐ serious ☐ minor	What is the chance the accident could happen again? ☐ very likely ☐ likely ☐ not likely

Preventative and/or Corrective Actions

Indicated Corrective Actions	Deadline	By Whom	Complete

Investigative Team

Name	Signature	Position/Title	Date

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Scaffold Safety Checklist

- This checklist shall be completed prior to each work shift that the scaffold is being used.
- The checklist will be completed by a competent person.
- If HBIC is using another contractors scaffolding, it shall be inspected by a HBIC competent person prior to use.

Job Name: _____ Job Number: _____

Erected By: _____ Date: _____

Inspected By: _____ Date: _____

Scaffold Safety Checklist			
	YES	NO	N/A
Are sills properly placed and adequately sized?			
Have screw jacks been used to level and plumb scaffold?			
Are base plates and/or screw jacks in firm contact with sills and frames?			
Are all scaffold legs braced with braces properly?			
Is guard railing in place on all open sides and ends above 10' (feet)?			
Are working level platforms fully planked between guard rails?			
Does planking have a minimum 12" overlap extended beyond supports and cleated at ends?			
Are toe-boards installed properly?			
Has a fall protection analysis been performed?			
Is fall protection equipment available if needed?			
Have all employees working scaffold been informed of and trained in safe working practices while working on the scaffold?			
Are out riggers properly installed at 90 degree angles perpendicular to the building?			
Have scaffold components been properly inspected for damage and compatibility?			
Are platforms at least 18" wide?			
Are guardrails installed at a height of 39" to 45"?			
Is the guardrail system capable of 200 lbs.?			
Has the scaffold been inspected by a competent person?			
Mobile Scaffolds			
Are frames secured by braces which provide lateral support to the vertical members of the scaffold?			
Are all braces connections secured?			
When moving the scaffold, is the necessary force applied as close to the base?			
Do the braces function to automatically square and align the frames?			
Are castors locked during scaffold use?			
Are all frame connections secured?			
Has the scaffold been inspected by a competent person?			

Competent Person Signature: _____ Date: _____

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Site Safety Audit

Job Name: _____ Foreman: _____

Job Address: _____

Inspected By: _____ Date: _____

Employees on Site: _____

Check the appropriate box and explain items that need attention in the comments section.

Personal Protective Equipment - PPE

	Yes	No	N/A
Are employees wearing job and task appropriate PPE?			
Are employees wearing hearing protection in areas where noise levels exceed 85db?			
Are employees wearing respiratory protection in accordance with the manufacturers SDS?			
Comments:			

Fall Protection

	Yes	No	N/A
Are employees wearing appropriate fall protection where a fall hazard exceeds 4' or more?			
Are Fall Protection Work Plans being completed for all fall hazards 10' and above?			
Are fall protection devices and equipment in serviceable condition?			
Are fall protection devices and equipment being used correctly?			
Comments:			

Ladders

	Yes	No	N/A
Are ladders in serviceable condition, and are the inspections documented on the Ladder Inspection Checklist?			
Are extension ladders secured at the top and bottom, extending at least 36" above the landing point and set to a proper pitch of 4:1?			
Are ladders being used correctly?			
Have Scaffold components been inspected for visible defects by a competent person prior to use?			
Comments:			

MEWP

	Yes	No	N/A
Has the MEWP been inspected, and has the inspection been documented on the MEWP Pre Use Checklist?			
Are the MEWPS being used appropriately?			
Are employees using fall protection inside the MEWPS when required?			
Are operators and occupants trained and authorized to use the MEWP?			
Comments:			

Housekeeping

	Yes	No	N/A
Are there clear and safe routes for ingress and egress to and from work areas?			
Are floor holes/penetrations protected, marked and secured?			
Are work areas clean and orderly?			
Is material stored or positioned to prevent tipping or falling?			
Have extension cords been inspected for visible defects and wear?			
Comments:			

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Site Safety Audit

First Aid & Emergency Preparedness

	Yes	No	N/A
Does the job box contain the following inspected and fully stocked items: BBP kit, First Aid Kit, and 2 eye wash bottles?			
Is the evacuation plan and rally point displayed and understood by all employees?			
Are Emergency numbers posted?			
Is there a jobsite First Aid Station?			
Where is the nearest Hospital/Urgent Care facility?			
Does the job have an onsite medic?			
If yes, name and phone number:			
List all HBI employees who are certified in First Aid and CPR:			
Comments:			

Administrative

	Yes	No	N/A
Have all employees read and signed the Site-Specific Safety Plan?			
Are Pre-Task Plans (PTP) being done daily?			
Are Toolbox Talks/Safety Meetings being conducted weekly?			
Have all employees been orientated to the jobsite?			
Comments:			

Miscellaneous

	Yes	No	N/A
Is there sufficient lighting on the job, and proper task lighting being used in work areas where necessary?			
Are portable fire extinguishers in accessible locations and in serviceable condition?			
Are the bathroom facilities, and hand washing stations operable and sanitary?			
Are all employees participating in stretch and flex daily?			
Comments:			

Comments/Corrective Action Taken

Inspector Signature: _____ Date: _____

Site Safety Orientation

As the foreman/competent person, I acknowledge that the following people have been advised of the hazards associated with their job tasks and are trained in the mitigation procedures to perform their job safely in accordance with Hudson Bay Insulation Company's Safe Work Practices and Policies.

Foreman Signature: _____ Date: _____

I, the undersigned, certify that I have read and understand the requirements for this project and will abide by the policies and procedures set forth before me. Furthermore, if I have questions or concerns regarding the personal safety of myself or others, I understand that I have the authority and the responsibility to stop work at any time.

Employee Name	Employee Signature	Date	Phone #

List additional names on the back of this page.

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Site Safety Orientation

Employee Name	Employee Signature	Date	Phone #

Appendix

HUDSON BAY® INSULATION

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Job Hazard Analysis

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JOB HAZARD ANALYSIS

Employees must review the requirements of this job hazard analysis prior to starting work.

Job Name: _____ **Date:** _____

Activity/Job Task: _____

Foreman/Competent Person: _____

Superintendent: _____

Prepared By: Jennifer Moreau
Safety Coordinator

Approved By: Chris Jenkins, CHST
Safety Director

High Risk Activity	Site Specific Safety Plan Reference Section
Working at heights	Fall Protection – Pg. 43-53 Fall Protection Work Plan – Pg. 135-138 MEWP – Pg. 78-82 Ladders, Stairways & Walkways – Pg. 83-85
Electrical Work	Electrical Safety – Pg. 39 Lockout/Tagout – Pg. 88-90
Material Handling	Forklift Operations – Pg.62-63 Personal Protective Equipment – Pg. 93-95 Material Handling & Storage – Pg. 77-78
MEWP Operation	MEWP – Pg.78-82
Confined Spaces	Confined Space Entry – Pg. 27-37 Confined Space Entry Permit – 131-132
Driving	Vehicle Safety – Pg. 116-118
Hazardous Material	Hazard Communication Plan – Pg. 64-65

Job Task	Potential Hazards	Hazard Controls to Prevent Injury
General Site Conditions.	• Physical injuries • Property & equipment damage. • Hazardous weather. • Congested work areas.	• Use proper PPE for the conditions and task including hard hat/safety helmet, safety glasses, hi-vis shirt, or vest on outer most layer, gloves (ANSI cut level 4 minimum) and proper footwear. • Conduct stretch & flex prior to starting work and at the end of the workday. • Be aware of your surroundings and foot placement. • Always use designated access and egress routes and gates. • Complete daily pre-task plan.

		• General housekeeping shall be performed daily to keep work areas clean and orderly. • Jobsite will be kept clean and free from debris that may cause trip hazards. • Use caution when traversing terrain that may be wet. Use an alternate path if available. • Observe overhead hazards and equipment swing radius, such as cranes and excavators. • **If, at any point, a job, a task or the work environment is deemed unsafe, HBI employees are encouraged to stop work until the appropriate PPE, engineering controls, equipment, training or conditions are available to make the job safe.**
Material Handling (loading, unloading, and staging of materials).	• Slips, trips & falls. • Strains and sprains. • Pinch points. • Struck-by. • Caught-in-between.	• Have proper PPE for the conditions. • Perform stretch and flex before the task. • Be aware of your surroundings (i.e., body placement, hand & foot placement). • Use proper lifting techniques. Know the weight of the load. Bend at your hips and legs. Do not overexert. Do not twist while lifting or carrying loads. Get assistance, either a buddy or use mechanical means. • Inspect your route of travel. Ensure you have a path clear of objects and personnel. • Keep the area behind the delivery truck clear of personnel with a barricade or spotter. • Do not attempt to load or unload the delivery truck until the driver has secured the truck, doors, lift ramps or removed hold-down straps. • Take caution of material shifting when material is being unstrapped from the truck and stay out of pinch points. • Keep materials stored in an orderly manner. Material should be stored in tiers, stacked, blocked, or interlocked. Barricade as necessary.
Material handling (Forklift).	• Equipment failure. • Untrained operator. • Improper use. • Pinch points. • Caught-in-between.	• Forklift inspections shall be completed daily. • Only qualified personnel shall operate forklift. • Use the forklift for its intended purpose only.

	• Dropped load/material. • Load shifting. • Equipment tip-over. • Boom/Mast collision.	• Never place body parts near pinch points on the forklift. • Keep feet and hands away from under the forklift and attachments. • Ensure back up alarms are installed and working on all forklifts. • Do not touch hot surfaces or electrical contacts. • Do not stand under or near an elevated load. • A survey of the area must be conducted before operation to identify any hazards including overhead obstructions and conditions such as wet soil that could make the machine unstable. • If ground conditions are not adequate, corrective measures shall be made before continuing operation. • Seatbelts must be always worn when operating a forklift. • Be aware of your surroundings for personnel and utilities. No piece of equipment shall be operated within 10’ of overhead power lines.
Use of ladders.	• Falls from ladders. • Dropped objects from heights. • Using ladder near energized electrical equipment.	• Ladders shall be inspected by the user before each use and the inspection shall be recorded on the HBI Ladder Inspection Card. • Ladders shall be used on firm, stable and level surfaces and be secured to prevent displacement. • Fully lock hinges in place on step ladders. • Do not stand on or above the second step at the top of the stepladder. • Stepladders shall not be used as a straight ladder and shall be used with legs fully extended; hinges locked. • Workers shall stay within the constraints of the ladder with three-points of contact to ladder. • When ascending or descending a ladder, the user shall face the ladder. • Objects that restrict the use of both hands for climbing shall not be carried up the ladder. • When activities are performed on a ladder that may lead to falling materials, barricade the area directly below the ladder. • Ladders shall have non-conductive side rails if they are used near energized electrical equipment. Wood or fiberglass ladders having

		metal parts shall not be used where potential electrical hazards exist.
Use of MEWPs.	• General requirements to use aerial lifts. • Pinch points. • Striking overhead objects. • Falls from MEWPs. • Rolling over MEWPs. • Fall Protection Hazard • Crush and pinch points	• MEWP's will be inspected by the authorized operator prior to each use and the inspection shall be recorded on the HBI MEWP Inspection Card and secured to the guardrail system. • All operators shall be trained in the safe use and operation of mobile elevated work platforms. • All operators shall be trained in the assessment of fall hazards and the use of required fall protection equipment for the task. • All operators shall perform a site assessment to determine the path of the MEWP to the work site. • Personnel shall always maintain a firm footing on the platform. • Ensure personnel are clear of MEWP prior to moving. • Inspect areas overhead prior to raising the MEWP platform. • All gates shall be always closed while personnel are on them. • Group A Scissor lifts shall be operated on level surfaces. Inspect areas for drops or rises in elevation to prevent turn over. • Operators in Group B Boom Lifts shall wear a full body harness with back D-ring used to attach a connector from the harness to a manufacturer approved anchorage point. • When leaving or entering the platform in the raised position the operator shall be protected by using a full body harness with back D-ring and 100% tie off connector attaching harness to an approved anchorage point. Tying off to an adjacent structure. • ***In atypical situations and after all other means have been exhausted; employees may seek approval from the general contractor and the Hudson Bay Insulation safety team to stand on the mid-rail of a MEWP to gain additional height to reach their designated work area. A fall-protection work plan and a revised pre-task plan must be developed and submitted to the coordinating teams prior to this action beginning. The employee will utilize a personal fall***

		protection system that is connected to an outside, overhead anchor point.
Cutting fibrous and non-fibrous insulation and insulation tapes.	• Hand injuries	• Plan and implement a detailed PTP identifying crew, hazards, and engineering controls to mitigate cuts, abrasions, and lacerations. • State on PTP that knives will be used in the performance of work. • Always use the right type of knife for the type of job, as defined by training. • Always maintain an adequately sharp knife to do the required task (a dull knife is more hazardous because it requires extra force to use it thereby increasing exertion and probability of slipping). • A minimum of ANSI cut-level 4 gloves must be worn when handling sharp objects and/or a potential for cuts, abrasions, or lacerations are present. • Each worker shall be instructed on HBIC's JHA and PTP policies and procedures. • Clear cutting table or work zone of all debris. Cutting table must be secure and stable prior to cutting. • Use proper knife safety, cut away from body, place securing hand in a safe position away from cutting zone. Draw knife in a smooth and steady stroke, minimize rapid and jerky movements. • Always store knives in a protective sheath, case, or tool bag when not in use and remain in plain view. • Never try to catch a falling knife (get all body parts out of the way of the knife).
Use of tools – hand/power.	• Cuts, abrasions, avulsions, bruises. • Electrical shock. • Hearing Loss from excessive noise. • Caught-in-between. • Repetitive motion injuries.	• Use the right tool/knife for its intended job and inspect tools and power cords prior to use. • Tools shall be maintained in a safe condition. Defective tools shall be removed from service immediately. • Wear the task appropriate PPE for the tool(s) being used. • If tools accommodate blade/wheel guards, they shall be used. • Electric power tools shall be double insulated or grounded. • Comply with the ASSURED GROUNDING PROGRAM and GFCI program.

		• Power tools shall not be hoisted or lowered by their electrical cords. • When temporary power cord sets (extension cords) are used they shall incorporate a Ground Fault Circuit Interrupter (GFCI). • Demonstrate and reinforce the proper use of hearing protection to prevent hearing loss. • Ear protection may be either earplugs or earmuffs, use the form of protection that you can wear properly. • When using insert tools, make sure there is a hand guard in place so there is no potential for smashed hands and/or fingers. • Employees are encouraged to switch hands often and vary the types of activities performed to limit exposure to repetitive-motion injuries.
Working at heights.	• Fall hazards. • Dropped materials & tools	• Identify all fall hazards at 0 feet, 4 feet and 10 feet. • Fall protection shall be used where the distance from the worker's support to the level where a fall would stop exceeds 4 feet while on working/walking surface or a 6' or greater fall in all other instances exists, shall follow the site-specific Fall Protection Plan. • All fall protection equipment will be utilized per the manufacturers designed purpose. • All fall protection equipment shall be inspected prior to each use, item(s) that do not meet the manufacturer's recommendation for serviceability shall be immediately removed from service and replaced with serviceable equipment. • All work areas where fall hazards exceed 10 feet or more will implement a fall protection work plan prior to beginning work. • Describe the method of fall arrest or fall restraint to be used. • Describe the correct procedures for the assembly, maintenance, inspection, and disassembly of the fall protection system used. • Delineate beneath the work area to eliminate unauthorized access. • Describe the method for prompt, safe removal of injured worker.

Use and Storage of Hazardous Materials.	• Injuries to personnel from contact. • Potential personal injury / property damage from fires. • Leaks to the environment.	• Personnel shall review Hudson Bay Insulation Company's Hazard Communication Program and have thorough knowledge of the materials they are handling/using. • Through review of the Hazard Communication Program and each product Safety Data Sheet (SDS) employee shall use product as intended and wear prescribed PPE. • All products shall be stored in appropriate lay down areas. • All products shall be used as prescribed. Do Not Mix products that might react with each other. • All products shall be stored in a manner in which if a leak occurs will not go to the environment (i.e. catch basins, etc.).
Respiratory Protection.	• General protection. • Fiberglass irritation.	• Respiratory protection shall be worn in accordance with product SDS. • Under normal exposure, use of a NIOSH approved dust respirator to protect against nuisance level dust and fibers should be used and is voluntary. • For operations that generate airborne fiber concentrations exceeding ten (10) times the established exposure limits, a NIOSH approved half mask respirator with a HEPA filter cartridge is to be used. Prior to use, a medical evaluation and a fit test shall be conducted.
Scaffold	• Slips, trips, & falls • Sprains & strains • Bodily injury • Dropped material & tools • Tip-overs	• Scaffolding shall be installed by a competent person trained in the proper installation and inspection of the scaffold in use. • The scaffold shall be inspected daily by the jobsite foreman prior to use and shall be tagged demonstrating the scaffold is then considered safe to use. • Platforms may be supported by legs, outrigger beams, brackets, poles, uprights, posts, and beams. • Scaffold shall have toe boards on all working platforms that are overhead. • Install guardrail systems along all open sides and ends of the platform. • Use a guardrail system or personal fall arrest system for scaffolds more than 10 feet above a lower level.

		• Follow the manufacturers allowable load for the casters, scaffold components and platforms. • Conduct thorough examination of all fall protection equipment. • Keep the platform free from tripping hazards such as hand tools, equipment, and material. • Barricade the area below the scaffold and eliminate entry for non-essential personnel. • Lock scaffold wheels with positive wheel and/or wheel and swivel locks to prevent movement while in use. • Utilize outriggers when building more than one stage of baker's scaffold.

As the foreman/competent person, I acknowledge that the following people have been advised of the hazards associated with their job tasks and are aware of the mitigation procedures to perform their job safely in accordance with Hudson Bay Insulation safety policies and procedures.

Foreman Signature: _____ Date: _____

I have read and understand the above Job Hazard Analysis, if I have questions or concerns regarding the personal safety of myself or others, I understand that I have the authority and the responsibility to stop work at any time.

Employee Name	Date	Employee Name	Date
