ENI Mechanical, Inc.

SAFETY HANDBOOK/MANUAL

JULY 2014

Plan Administrator:

Andrew J. Leonard

President

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Safety Policy

Safety Policy

It shall be the policy of ENI Mechanical, Inc. to assure to the highest degree possible, a safe and healthy working environment for all its employees.

In order to achieve the company's goal of a hazard free working environment employees and non-employees who use company facilities are required to obey the rules set forth in the company safety program, or be subject to disciplinary action.

The company will meet or exceed all local and federal laws and regulations pertaining to the construction industry.

POLICIES AND PROCEDURES FOR MATERIAL SAFETY DATA SHEETS

1. Maintaining our company's MSDS is the responsibility of the Hazard Communication Coordinator.
2. Our MSDS books are maintained at the office located at 39 S. Gordon St., Gouverneur, NY
3. Any employee wishing to see an MSDS book should contact office personnel. The employee will be asked to complete a request form, a copy of which is included in the HazCom Plan. That MSDS will be made available to the employee within the work shift unless we have been unable to obtain it from the supplier.

In the event that an MSDS is not available, a "Material Safety Data Sheet Request Follow UP Memo" shall be prepared in duplicate and one copy will be given to the employee requesting the MSDS and the second copy, signed by the employee, shall be kept on file.

Obtaining MSDS

4. All purchase order shall include a requirement that all MSDS be sent to the hazardous Communication Coordinator.
5. It is the responsibility of the receiver of the material to insure that each hazardous material is delivered with or preceded by MSDS
6. In the event that the first chemical shipment is not preceded or accompanied by and MSDA, the receiver will notify the Hazard Communication Coordinator who will notify the supplier/manufacturer by sending a "Material Safety Data Sheet (MSDS) Supplier Request" letter to the supplier of the chemical.
7. A "Material Safety Data Sheet 2nd Request" letter shall be sent to the supplier if an MSDA is not received within 15 days.
8. If the MSDS is not received within the next 15 days, a "Material Safety Data Sheet Letter of Compliant" shall be forwarded to OSHA requesting assistance in obtaining the MSDS.
9. The Hazardous Communication Coordinator will maintain copies of these communications.

DIRECTYOR OF SAFETY – ROBYN ESTEY

SUPERVISORY RESPONSIBILITY

1. Comply with OSHA regulations to correct deficiencies and insure a safe environment for all employees
2. Development of method for identifying unsafe conditions
3. Investigate major accidents and critical incidents
4. Monitor and follow-up on all supervisor's accident reports
5. Oversee all OSHA forms, logs and records
6. Work and communicate with insurance companies on information and details involving compensation cases due to accidents and illnesses.
7. Prepare and submit a safety budget
8. Organize, administer, and conduct safety training and educational programs
9. Stay informed of any changes in safety-related rules and regulations
10. Represent the company in safety-related affairs.
11. Maintain a supply of personal protection equipment.

OWNER AND/OR FOREMAN RESPONSIBILITES

To Assure:

1. Safety rules and regulations established by the Safety Director are complied with.
2. Workmen are given adequate training and instructions
3. Safety inspection of job equipment as required is carrier out.
4. Accidents receive prompt investigation and reporting.
5. Hold weekly safety meetings for all employees and log names of persons attending.
6. Show all employees the location and contents of the first aid kit
7. Instructing workmen under his supervision in safe work practices and work methods at the time they are given work assignments.
8. Seeing that his crew has the proper protective equipment and suitable tools for the job before starting work and that they are used.
9. Constantly checking to see that no unsafe practices or conditions are allowed to exist on any part of this job.
10. Setting a good example for his men
11. Acquainting his men with safety requirements and seeing they are enforced
12. Making a complete investigation of accidents to his men to determine facts necessary to take corrective action.
13. Promptly completing the accident report and investigation, and handing it to the Safety Director.
14. Allowing only qualified personnel to operate power tools and equipment.

EMPLOYEE RESPONSIBILITY

1. Know and observe all rules and regulations relating to occupational safety and health.
2. Know and follow all standard operating procedures, including Job Safety Analysis for each occupation.
3. Properly use prescribed protective equipment
4. Maintain protective equipment in acceptable conditions
5. Report to supervisor conditions or procedures, which are considered a hazard to health or safety.
6. Practice good personal hygiene habits.
7. Must report ALL injuries to their supervisor or foreman
8. An employee who becomes sick or injured while on duty must report to his supervisor before going home
9. Participate in Safety Program and Fall Protection as outlined.

EQUIPMENT

Only trained and company approved operators will be allowed to operate equipment. The following are not merely guidelines, they are minimum standards of safety in the operation of equipment. Each operator should study them, know them, and follow them. No employee is allowed to operate any piece of company equipment without his superior's knowledge.

1. Check equipment to see that is in safe operating condition. If in doubt, contact your supervisor and do not operate until approval is given.
2. Do not speed and do not stop suddenly.
3. Slow down at all intersections
4. Be on the alerts for pedestrians
5. Do not attempt to exceed the capacity of your equipment by carrying loads which are heavy or unbalanced.
6. Operators should face their destination. If unable to see over the load, the vehicle should be driven backwards.
7. Never leave a vehicle unattended.
8. When parked, buckets or blades will be flat to the ground, shift levers in neutral, and the brakes set.
9. Never allow people to ride in buckets or on blades.

EQUIPMENT

General Requirements:

1. All equipment left unattended at night, adjacent to a highway in normal use, or adjacent to construction area where work is in progress shall have appropriate lights or reflectors, or barricades equipped with appropriate lights or reflectors, to identify the location of the equipment
2. A safety tire rack, cage, or equivalent protection shall be provided and used when inflating, mounting, or dismounting tires installed on split rims, or rims equipped with locking rings or similar devices.
3. Heavy machinery, equipment, or parts thereof, which are suspended or held aloft by use of slings, hoist or jacks shall be substantially blocked or cribbed to prevent falling or shifting before employees are permitted to work under or between them. Bulldozer and scraper blades, end loader buckets, dump bodes, and similar equipment, shall be either fully lowered or blocked when being repaired or when not in use. All controls shall be in a neutral position, with the motors stopped and brakes set, unless work being performed required otherwise.
4. Whenever the equipment is parked, the parking brake shall be set. Equipment parked on inclines shall have the wheels chocked and the parking brake set.
5. All cab glass shall be safety glass, or equivalent, that introduces no visible distortion affecting the safe operation of any machine covered by this subpart.

HAND TOOLS

1. Get instructions from foreman before using any tool with which you are not familiar.
2. Handle tools with care and keep them in good working condition. Do not drop or throw and tool or equipment from one level to another.
3. Use tools only for the purpose for which they are designed.
4. Tools with mushroomed heads are not to be used.
5. Hammers with split or cracked handles are not to be used.
6. Worn out, broken or otherwise defective tools should be reported to foreman.
7. When using wrenches see that they fit nut properly, to avoid slipping. When practical, pull the wrench rather than pushing it.
8. Avoid standing in front of or within swing of picks, sledges, hammers, hatches, axes, bars or other tools or repair implements.
9. Hand tools are usually heat treated for specific hardness and unauthorized repair often destroys this quality and results in chipping. Unauthorized repair of tools is prohibited.

POWER OPERATED EQUIPMENT

1. As related to masonry construction, all troweling machines, mortar mixers, concrete and masonry saws, tampers, etc. shall be used with all guards in place.
2. Belts, gears, shafts, pulleys, sprockets, spindle drums, fly wheels, chains or other reciprocating, rotating or moving parts of equipment shall be guarded if such parts are exposed to contact by employees or otherwise create a hazard.
3. Employees using hand and power tool and exposed to the hazard to falling, flying, abrasive, and splashing object, or exposed to harmful dusts, fumes, mists, vapors, or gases shall be protected with the particular personal protective equipment necessary to protect them from the hazard. Empire Northeast, Inc. will provide rigid body cushioned fitting goggles and an approved dust make for this work.
4. All fuel-powered tools shall be stopped while being refueled, serviced, or maintained, and fuel shall be transported, handled, and stored in the OSHA approved gas cans provided by ENI Mechanical, Inc.

HEAD PROTECTION

1. Protective helmets shall be protect employees working in areas where there is a possible danger of head injury from impact, or from falling of flying objects, or from electrical shock and burns.

EYE AND FACE PROTECTION

1. Employees shall be provided with eye and face protection equipment when machines or operations present potential eye or face injury from physical, chemical, or radiation agents.
2. Goggles or spectacles shall protect employees whose vision requires the use of corrective lenses in spectacles, when required by this regulation to wear eye protection
3. Face and eye protection equipment shall be kept clean and in good repair. The use of this type of equipment with structural or optical defects shall be prohibited.

SLIPS AND FALLS

IN ORDER TO AVOID INJURY RESULTING FROM SLIPS AND FALLS THE FOLLOWING PRECAUTIONS ARE TO BE TAKEN:

1. Look where you are going. When carrying packages or other objects, always carry optimum loads in such a manner that vision is not blocked. Take safest pathway.
2. Wear proper footwear for the job.
3. Use equipment as it was meant to be used. Get a firm grip on stair hand rails and vehicle grab rails
4. Don't walk where you aren't meant to walk such as; on belts, rollers, slides, conveyors, restricted area.
5. Watch you balance. Walk briskly, don't run, take normal steps, step don't jump. Remember, stay on your feet.

PERSONAL PROTECTIVE EQUIPMENT

1. Persons who must work where hazards cannot be eliminated or controlled at the source, and where ordinary work clothes do not afford sufficient protections, employee should use personal protective equipment, which, if necessary, can protect the person from head to toe.
2. An important aspect of personal protective equipment is supervision and enforcement. First line supervision should be familiar with the equipment in order that they can explain and demonstrate its usefulness and cause. This is done in pre-employment training and at safety meetings.
3. Any personal protective equipment can be obtained from the office of ENI Mechanical, Inc.

FALL PROTECTION WRITTEN PROGRAM

Purpose:

The purpose of this program is to establish procedures for using fall protection at ENI Mechanical, Inc.

This program supports compliance with Occupational Safety and Health Administration (OSHA) Fall Protection Standard as found in 29 CFR 1926.500. 501, 502, and 503. This program applies to all company employees who work in area that contain fall hazards of 6 feet or greater.

DEFINITIONS:

ANCHORAGE: A secure point where lifelines, lanyards or deceleration devices are attached.

BODY HARNESS: Straps around the employee that distribute the forces from stopping the fall over at least the thighs, pelvis, waist, chest and shoulders, along with a means for attaching the harness to other components of the personal fall arrest system.

CONNECTOR: A device used to connect parts of the personal fall arrest system and positioning device systems; may be an independent component of the system (such as a carabiner) or an integral component of the system (such as a buckle or D-ring sewn into a body belt or body harness or a snap hook spliced or sewn to a lanyard or self-retracting lanyard.)

CONTROLLED ACCESS ZONE (CAZ): An area in which certain work (for example bricklaying) may take place without the use of guardrail systems, personal fall arrest systems or safety net systems; access to the zone is controlled.

DECELERATION DISTANCE: The additional vertical distance a falling employee travels from the point at which the deceleration device begins to operate to the point at which the employee stops; measured as the distance between the location of the employee's body belt or body harness attachment point at the moment the deceleration devise is activated and the location of that attachment point after the employee comes to a full stop.

FREE FALL: The act of falling before a personal fall arrest system begins to apply force to stop the fall.

FREE FALL DISTANCE: The distance between the location of the fall arrest attachment point on the employee's body belt or body harness before the fall and its location just before the system begins to apply force to arrest the fall; does not include deceleration distance and lifeline/lanyard elongation.

LANYARD: A flexible line of rope or strap that generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline or anchorage.

LEADING EDGE: The edge of a floor, roof or formwork for a floor or other walking/working surface (such as the deck) that changes location as additional floor, roof, decking or formwork sections are placed, formed or constructed; considered to be an unprotected side and edge during periods when it is not actively and continuously under construction.

LIFELINE: A component consisting of a flexible line that connects to an anchorage at one end to hang vertically (vertical lifeline) or connects to anchorages at both ends to stretch horizontally (horizontal lifeline); a means for connecting other components of a personal fall arrest system to the anchorage.

PERSONAL FALL ARREST SYSTEM: A system worn by an employee to stop a fall before he or she reaches a lower level; consists of an anchorage, connectors, a body belt or body harness and perhaps a lanyard deceleration device, lifeline or suitable combination of these; as of January 1, 1998, the use of body belts for arrest is prohibited.

SELF-RETRACTING LIFELINE/LANYARD: A deceleration device containing a drum-would line that can be slowly extracted from or retracted onto the drum under slight tension during normal employee movements and that, after onset of a fall, automatically locks the drum and stops the fall.

UNPROTECTED SIDES AND EDGES: Any side or edge (except at entrances to points of access) of a walking/working surface (such as floor, roof, ramp or runway) where there is no wall or guardrail system at least 39 inches (1.0 m) high.

RESPONSIBILITIES

The Program Administrator – Andrew Leonard

This person is responsible for:

- Issuing and administering this program and making sure that it satisfies the requirements or all applicable federal, state and local fall protection requirements.
- Providing initial and periodic training to employees on fall protection.
- Maintaining the training records of all employees included in training sessions.
- Assuring that a fall protection assessment is completed for each job in which fall hazards may be present.

Supervisors whose employees may be exposed to fall hazards

These people are responsible for:

- Knowing the hazards in their areas that require fall protection.
- Assuring that fall protection is utilized on all jobs where fall hazards exist.
- Enforcing the use of fall protection in the areas in which it is required.
- Completing a fall protection assessment for each job in which fall hazards may be present.

Employees who are required to use fall protection

These people are responsible for:

- Using fall protection according to the training and manufacturers' instructions provided.
- Properly maintaining their personal fall protection systems.

PROGRAM ACTIVITIES:

GENERAL:

- Fall hazards will be assessed on each jobsite and appropriate fall protection will be provided for all affected employees who have potential fall hazards of 6 feet or greater.

PERSONAL FALL ARREST SYSTEMS:

- Employees are required to use personal fall arrest systems in all situations in which fall hazards exist on the jobsite and guardrails or other forms of permanent fall protection are not available.

- All personal fall protection equipment must meet ANSI standard Z359.1-1992, and applicable OSHA standards including 1926 Subpart M-Fall Protection
- All lanyards must be equipped with double locking snap hooks.
- A personal fall arrest system must consist of a full-body harness, a shock absorbing lanyard and an anchorage point rated for 5,000 pounds per person.
- Body belts can be used only for positioning and only in situations in which free falls of 2 feet or less exist and employees can immediately recover after falling.
- Personal fall protection equipment must be replaced when damaged.
- Personal fall protection must be used on all ladders and vertical concrete formwork higher than 24 feet.

TRAINING

- Training will be provided for all employees who may be exposed to fall hazards as part of their jobs.
- The training will enable each employee to recognize fall hazards and teach the procedures to be followed to minimize those hazards.
- The training will consist of the following:
    a. The nature of fall hazards in the work area
    b. The proper procedures for using, operating, erecting, maintaining, disassembling, and inspecting the fall protection system, when it is used.
    c. The limitations of mechanical equipment during the performance of roofing work on low-sloped roofs.
    d. The proper procedures for handling and storing equipment and materials and erecting overhead protection
    e. The roles of employees in fall protection plans
    f. The content of the OSHA fall protection standard.

ATTACHMENTS:

Recordkeeping

- Fall protection job assessment form
- Safety net installation certification form
- Safety net weekly inspection checklist
- Fall protection training record

RECORDKEEPING:

Safety net installation certification

If the employer can demonstrate that it is unreasonable to perform the drop test on a safety net, OSHA requires him or her (or a designated competent person) to certify that the net and installation comply with the standard by preparing a certification record prior to using the safety net. The certification record must contain:

- An identification of the net and net installation.
- The date on which it was determined that the identified net and net installation were in compliance with the standard.
- The signature of the person making the determination and certification.

A copy of this certification must be kept at the jobsite.

A safety net installation certification form that you can use for this purpose is provided in this section.

FALL PROTECTION PLANS

OSHA states that if the employer can demonstrate that the use of conventional fall protection equipment is not feasible or will create a greater hazard, plans must be created to provide protection against fall hazards. That is, a plan must be created for each specific location, containing;

- The location of the job.
- The erecting company name
- The date the plan was created or modified
- The name of the person who prepared the plan
- The name of the person who approved the plan
- The name of the person who supervised the plan
- A statement of company policy regarding fall protection, including the purpose of the plan
- Fall protection systems to be used on the project
- Procedures for implementing the plan
- Fall protection systems that will not be used, including and explanation as to why
- Measures for enforcing the plan
- Accident investigation procedures
- Procedures for making and approving changes to the plan

A copy of the fall protection plan, with all approved changes, must be kept at the jobsite.

Samples of fall protection plans for precast/pre-stressed concrete erection and residential construction are included in Appendix E of Subpart M in the OSHA standard form at the end of the "How to Comply" section.

TRAINING RECORD

A written certification record of all fall protection training activities must be maintained. This record should include:

- The name (or other identity) of the employee trained
- The Social Security number of the employee trained
- The date(s) of the training
- The signature of the person conducting the training or of the employer

A fall protection training record form that you can use for this purpose is provided in this section.

PERSONAL FALL ARREST SYSTEM INSPECTION

All systems should be checked both prior to each wearing and on a systematic basis. Components must be checked by employees and safety coordinator for:

- Signs of wear
- Tearing and fraying
- Dirt and debris
- Degradation caused by the sun
- Deformed eyelets or d-ring

When a personal fall arrest system show **any signs of damage** it must be replaced or repaired immediately. When a system has been subject to a fall it must be removed from service and inspected. Any arrest system that has been damaged beyond repair must be destroyed.

LADDERS

All ladders should be periodically inspected for wear and tear or any potential fall hazard. Ladders are to be used only for their intended purpose, always keeping safety first. The following items must be addressed when ladders are used:

- Inspect ladder to determine if in good condition
- Any onsite made ladder must be properly constructed
- Stepladders are to be fully opened
- Rungs or cleats can't be over 12'

- Metal ladders must not be used around electrical hazards
- Ladders should be painted
- Ladders must have safety shoes

All employees must have proper training prior to ladder use. Proper use of the appropriate equipment must be stressed. Climbing techniques and safe use must always be top priority.

SCAFFOLDING

Scaffold may only be used when it is appropriate and must always be properly erected and include designed safety braces. The erectors must have appropriate training in scaffold erection. Following find items to be included:

- Scaffolding footage and anchorage
- Guardrails and toe boards on all scaffolds and platforms of 10' or more
- All parts should be inspected for condition and damage parts discarded
- Access ladders must be provided
- Wire mess should be utilized when people pass under scaffold
- Scaffold plumb and square with cross bracing must be included

BARRICADES

Fences and barricades must be installed to prevent employees from falling from roofs, into shafts, pits, wells and excavations. They may also be used when a falling object hazard exists from above. Barricades should be utilized to prevent employee fall exposure and the following action must be taken.

- Floor opening must be planked over or barricaded
- All roadways and sidewalks should be effectively protected
- Adequate lighting needs to be provided
- Perimeter guards on elevated floors

GUARDRAILS

The most common form of fall protection is the guardrail, which is used to keep employees from stepping off working surfaces. They may be constructed of wood, pipe, structural steel or cable and have the following elements:

- Top rail
- Mid rail
- Posts
- Toe board

The top rail must be between 39"-45" above the working surface. Posts may be placed no more than 8' apart and end joints must have no overhanging pieces that may catch clothing. The mid rail is located half-way between top and floor. The toe board is attached at the walking level to keep employees from slipping over the edge. This also serves to keep tools and materials from being kicked into hole. The toe board must be at least 3.5" high and constructed of a solid material.

SAFETY NETS

Safety nets are placed underneath walking and working surfaces to catch employees, tools and materials. They are made of strong synthetic materials with hold no larger than 6'>

COVERS

Covers should be used to protect employees from falling through or into a hole.
OSHA standards require that any gap or void 2" or more must be covered.

JOB INSPECTION PROCEDURES

Regular job site inspections will allow the Safety Director and/or Foreman to regulate and implement an effective safety program. Inspections should be conducted prior to the start of the job, then periodically (weekly, monthly). Normal procedures should be followed and worksheets/checklist may be used to note hazards that exist.

TRAINING & EDUCATION

The initial safety training provides new employees with an introduction to employee's job description, operational procedures and safety program. OSHA provides a "Construction Training Requirement" which outlines the employer's responsibility and applicable standards. An effective training program is ongoing and dynamic. Training begins at the time of hire and continues to provide refreshers and to teach on current issues. Whenever an employee lacks knowledge and understanding of a procedure or practice, training updates need to be provided. Worksheet that pertain to training schedule should be included in each employee file. Notations may be included describing topics, dates and instructor.

SAFETY EDUCATION AND TRAINING

An active safety program reinforces a company's commitment to their employees and their wellness. Our program implements several Safety Seminars annually on such topics as "Fall Protection". Monthly reviews with the Safety Director, management and members of the Safety Committee. Foremen will be sent reports from this meeting for their review.

Weekly safety training meetings are conducted briefly approximately once per week. This gathering will cover brief topics relative to potential job hazards or other relevant items. Informal "Tool Box Talks" would be another example of this type of meeting.

First Aid/CPR Training is recommended for supervisor personal. Any and all other employees are encouraged to attend this Red Cross program.

DISCIPLINARY ACTIONS

When safety rules and regulations are not complied with disciplinary actions will be taken. Any action taken against employees will be fair, thorough and consistent. Employees should realize that this active safety program has been developed because of the employer's commitment to safety. Violation of the rules will result in disciplinary action to the offending employee. The punishment will be determined by the magnitude of the violation.

SAFETY AWARDS

As motivation to employees incentive programs promote excellence within the program. Company apparel and other items are included to promote safety.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Once and employee is issued any form of personal protective equipment he becomes responsible for its upkeep. If a piece of PPE becomes damaged, it must be reported to your foreman immediately. The damaged piece of PPE must be turned in before a new item is issued.

The company will maintain a supply of the following Personal Protective Equipment:

- Hard Hats
- Rigid Body Cushioned Fitting Goggles
- Ear Plugs
- Rain Suits

LIFTING

IN ORDER TO PREVENT INJURY AS A RESULT OF UNSAFE LIFTING PRACTICES THE FOLLOWING WILL BE STRICTLY ADHERED TO AT ALL TIMES:

1. When lifting heavy materials:
    - Stand with secure footing directly in front of object to be lifted
    - Bend the knees and keep the back erect, use legs to lift heavy material
    - Take a firm grip on the object to be lifted and slowly straighten the legs

- Do not attempt to lift beyond your normal physical capability. Obtain help if necessary, to lift or handle heavy or cumbersome objects
- Lift with your legs not your back

2. When two or more employees handle heavy or bulky materials or objects:
   - One employee shall be designated to give prearranged signals for all movements, which movements (lifting, carrying, dropping or placing) are to be in unison. Teamwork is essential
   - When practical, avoid walking backwards.
3. When carrying long material be aware of obstructions and persons nearby to avoid striking them. Allow plenty of room when following a person carrying a long tool or material.
4. Allowing material to rest in an insecure position, even for an instant, is prohibited.
5. Place material on a substantial foundation, in an orderly manner, clear of the walkways.
6. Throwing or dropping material from moving or standing equipment without knowing that no one is in a position to be struck by it is prohibited.
7. Use care when placing or removing material from a pile to avoid dislodging other parts that may fall from the pile. Pile material neatly.

ACCIDENT REPORTING AND INVESTIGATION

1. The proper reporting and investigation of accidents is a necessary part of any Accident Control Program. Determining causes of accidents indicated by a means which will prevent recurrences
   - All employees would be instructed to report to first aid for treatment of all injuries no matter how trivial they may appear.
   - All accidents requiring a doctor's or hospital treatment should be investigated immediately by the injured man's foreman. The accident report and investigation form shall be completely made out by the foreman in charge, reviewed and approved by the Superintendent, and then sent to the owner for recording.
   - The routing of the accident report and investigation form (Foreman's Copy) should be as follows:
     a) Originating at first aid by the Foreman, Foreman to the Owner of ENI Mechanical, Inc.
2. The owner consistently shall keep a daily record of all accidents no matter how trivial they may appear.

3. Properly completed accident report forms are to be forwarded within a 24-hour period of the accident occurrence to the Insurance Carrier's designated office.

FIRE PREVENTION

1. When practical, objects to be cut, or heated shall be moved to a designated safe location or, if the objects to be cut or heated cannot be readily moved, all movable fire hazards in the vicinity shall be taken to a safe place, or otherwise protected.
2. If the objects to be cut or heated cannot be moved and if all the fire hazards cannot be removed, positive means shall be taken to confine the heat, sparks, and slag, and to protect the immovable fire hazards from them.
3. No cutting or heating shall be done where the application of flammable paints or the presence of other flammable compounds, or heavy dust concentrations create a hazard.
4. Suitable fire extinguishing equipment shall be immediately available in the work area and shall be maintained in a state of readiness for instant use.
5. Always keep the fire extinguisher near all power equipment with combustion engines.
6. When cutting, or heating operation is us such that normal fire suppression precautions are not sufficient, additional personnel shall be assigned to guard against fire while the actual cutting, or heating operation is being performed, and for a sufficient period of time after completion of the work to ensure that no possibility of fire exists. Such personnel shall be instructed as to the specific anticipated fire hazards and how the firefighting equipment provided is to be used.

FIRE PREVENTION AND RESPONSE

THE FOLLOWING PRECAUTIONS WILL BE TAKEN AT ALL TIMES TO AVOID FIRE:

SMOKING:

1. Obey "No Smoking" signs
2. Watch for danger spots even if no warning is posted (e.g. temporary storage area that may contain combustibles)
3. Don't lay lighted cigarettes on wooden tables or workbenches, even if smoking is permitted,
4. Never flick a butt or knock out a pipe in a wastebasket or trash can.

FLAMMABLE AND COMBUSTIBLE LIQUIDS:

1. Keep these liquids away from open flames and motors that may spark
2. When you transfer them, bond the containers to each other and ground the one being dispensed from, to prevent sparks from static electricity
3. Clean up spills right away, and put oily rags in a tightly covered metal container.
4. Change clothes immediately if you get oil solvents on them.
5. Watch out for empty containers that held flammable or combustible liquids; vapors may still be present
6. Store these liquids in approved containers in well-ventilated areas away from heat and sparks.
7. Be sure all containers for flammable and combustible liquids are clearly and correctly labeled.

ELECTRICITY

1. Checked for frayed insulation and damaged plugs on power cords or extension cords, damp or wet wires, oil and grease of wires.
2. A cord that's warm to the touch when current is passing through should warn you of a possible overload or hidden damage.
3. Don't overload motors; watch for broken or oil soaked insulation, excessive vibration or sparks; keep motors lubricated to prevent over heating.
4. Defective wiring, switches and batteries on company vehicles should be replaced immediately.
5. Electric lamps need bulb guards to prevent guards contact with combustibles and to help protect the bulbs from breakage.
6. Don't try to fix electrical equipment yourself if you're not a qualified electrician.

HOUSEKEEPING

1. Keep your work area clean
2. Passageways and fire doors should be kept clean and unobstructed
3. Material must not obstruct sprinkler heads or be piled around fire extinguisher locations or sprinkler controls
4. Combustible materials should be present in work areas only in quantities required for the job, and should be removed to a designated storage area at the end of each workday.

HANDLING OF SAFETY EQUIPMENT

1. Safety equipment and protective clothing shall be dispensed under the direction of the Safety Director. A suitable storeroom will be provided for this purpose, with an adequate supply kept on hand at all times.
2. Personal safety equipment and protective clothing will be controlled by an issue slip for each employee requiring the employee's signature, as to what articles are assigned to his use. Re-issue of these articles is to be controlled by requiring the employee to turn in worn or destroyed articles. If the original article is not available, the employee's foreman shall authorize the re-issue of the article.

GENERAL SAFETY RULES AND REGULATIONS

1. Operation of machinery or equipment except when authorized, is forbidden
2. All personnel involved in handling heavy material must wear safety shoes
3. When handling steel cables and chains, gloves must be worn
4. Rubber gloves and appropriate body protection must be work when handling hazardous materials.
5. Never use fingers to align holes, or to determine whether they are in proper alignment, for insertion of rivet bolt or pin.
6. Do no use the bare hand to brush chips away from tools or to clean work area. Use a brush or other suitable object.
7. Keep material and tools not being used a safe distance from pathways and aisles
8. Storing of materials on floor of trucks or stockroom, shall be done carefully and neatly, with special consideration to stability of piles. In taking materials off piles, use care to avoid dislodging.
9. Deposit all oily materials, rags, etc. in designated receptacles and keep them covered to prevent fires.
10. Keep lids closed on all oil and grease tanks or receptacles and clean up all oil or grease spilled on the floor. Avoid slipping hazards.
11. Gasoline, diesel fuel or other flammable liquids are to be carried only in safety cans provided for that purpose.
12. When using oxy-acetylene or electric welding apparatus around diesel units, a fire extinguisher shall be kept in readiness in case of a fire. Do not weld fuel tanks until tanks have been drained and steamed out or filled with carbon dioxide gas.
13. Never use metal cased flashlights around electrical equipment. Use a hard rubber or not-metallic cased flashlight.
14. Projecting nails are dangerous. Remove or bend them over whenever found.

15. Stay clear of loose or dangling wires. Consider them to be live until it is positively known they are dead. Report them promptly to your supervisor.

Page

SAFETY AUDIT			
Person(s) Making Inspection:			Title:
Date:		Time:	
	Immediate Corrective Action Completed	**Adequate At Time of Inspection**	**Not Acceptable**
JOB-SITE INFORMATION			
a. OSHA and other job-site warnings posters			
b. Toll box safety meeting material on site			
c. Adequate first aid equipment available			
d. Forms for job-site injury and accident records posted.			
e. Are emergency telephone numbers conspicuously posted?			
HOUSEKEEPING AND SANITATION			
a. General neatness of working areas			
b. Passageways and walkways clear			
c. Waste containers provided			
d. Sanitary facilities adequate and clean			
e. Adequate supply of drinking water			
f. Disposable drinking cups			
g. Adequate lighting			
h. Trash receptacle for drinking cups			
FIRE PREVENTION			
a. Fire instruction to personnel			
b. Fire extinguishers identified, checked			
c. Hydrants clear, access to public thoroughfare open			
d. Housekeeping			
e. "No Smoking" signs posted and enforced where needed			
f. Storage, use and handling of flammable and combustible liquids in accordance with standards			
g. Clearance, proper mounting, ventilation for temporary heating.			

	Immediate Corrective Action Completed	Adequate At Time of Inspection	Not Acceptable
ELECTRICAL INSTALLATIONS:			
a. Adequate wiring, well insulated and fused properly			
b. All electrical equipment grounded and all extension cords three-wire type or double insulated tools used			
c. Electrical dangers posted			
d. All terminal boxes equipped with required covers			
e. Concealed electrical lines located and marked			
f. Proper guards on temporary lights			
g. G.F.C.I. or assured grounding program			
HAND TOOLS			
a. All power tools operated in a safe manner			
b. All power operated tools properly guarded			
c. Electrical tools grounding and/or double insulted			
d. Pneumatic power tools, fuel power tools, hydraulic power tools have required guards.			
POWER ACTUATED TOOLS:			
a. Local laws and ordinances complied with			
b. Tools checked and in good working order			
c. Safety goggles or face shields available			
d. Tools used only on recommended materials			
e. Power-actuated tools have required safeguards			
f. Operated only by trained personnel			
g. Tools and charges protected from unauthorized use			
h. Competent instruction and supervison available			

	Immediate Corrective Action Completed	Adequate At Time of Inspection	Not Acceptable
LADDERS:			
a. Ladders inspected and in good condition			
b. Onsite-made ladders constructed of sound material			
c. Stepladders fully open when in use			
d. Rungs or cleates not over 12"			
e. Metal ladders not used around electrical hazards			
f. Ladders painted			
g. Ladders equipped with safety shoes			
SCAFFOLDING			
a. Scaffolding footing and achorage			
b. Guardrails and toeboards on all scaffolds and platforms more than 10' high or where needed			
c. Scaffolds or parts damaged or weakened			
d. Access ladder provided for scaffolds			
e. Wire mesh or equivalent available for scaffolds when persons must pass under scaffolds			
f. Scaffold plumb and square with cross-bracing.			
MOTOR VEHICLES			
a. Regular inspection and maintenance			
b. Operators licensed and qualified			
c. Local and state vehicle laws and regulations observed.			
d. Brakes, lights, warning devices operative			
e. Weight limits and load sizes controlled			
f. Personnel carried in a safe manner			
g. All glass in good condition			
h. Back-up signals provided			
i. Fire extinguishers installed where required.			
BARRICADES			
a. Floor openings planked over or barricaded			
b. Roadways and sidewalks effectively protected			
c. Adequate lighting provided			
d. Traffic controlled			
e. Perimeter guards on elevated floors			

E.N.I. MECHANICAL, INC.
dba Empire Northeast

Energy Specialists

(315) 287-3528

Heating & Plumbing Contractors

39 South Gordon Street
Gouverneur, New York 13642

November 5, 2015

To: All Employees

Re: Safety Program Update

The following will be added to the Disciplinary Actions section of our Safety Handbook/Manual effective immediately:

When safety rules and regulations are not complied with, disciplinary actions will be taken. Any action taken against employees will be fair, thorough and consistent. Employees should realize that this active safety program has been developed because of the employer's commitment to safety. Violation of the rules will result in the following disciplinary action to the offending employee. The punishment will be determined by the magnitude of the violation.

1. All employees found to be committing a safety infraction will be given an Employee Disciplinary Action Form that will be completed by Andrew Leonard. The employee will have the violation explained and he/she will sign the warning sheet that will be kept in his/her personnel file.

2. A second offense of the same violation will warrant a day off with no pay and completion of another Employee Disciplinary Action form.

3. A third offense of the same violation will warrant 5 work days off with no pay and completion of another Employee Disciplinary Action form.

4. A serious violation or repeated disregard of ENI Mechanical's safety program as determined by Administrative staff may warrant immediate dismissal.

All offenders will be given refresher safety training regarding the offense and reaffirm the policies of ENI Mechanical, Inc. to maintain a healthy and safe workplace environment.

ENI Mechanical, Inc.
EMPIRE NORTHEAST
Mechanical Contractor

Revision to Safety Manual 2/24/20

Purpose

Dust created when working with crystalline silica contains harmful particles. And while respirable crystalline silica looks like dust, it's much more harmful to workers' lungs. In fact, silica dust is a carcinogen, and breathing it in causes the formation of scar tissue, reducing the lungs' ability to take in oxygen. Together, these facts outline the importance of adhering to safe work procedures related to respirable crystalline silica.

ENI Mechanical is committed to establishing a safe working environment for all employees. As such, this policy is in place to ensure all parties closely follow Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1926.1153) and to reduce the number of preventable on-the-job illnesses and injuries related to respirable crystalline silica.

Scope

Employees can be exposed to respirable crystalline silica when performing work involving chipping, cutting, drilling, grinding or similar activities on materials containing crystalline silica. This policy is designed to keep employees safe and relates to occupational exposures to respirable crystalline silica in construction work. It should be noted that this policy does not apply where employee exposure remains below 25 micrograms per cubic meter of air (25 $\mu g/m^3$) as an eight-hour time-weighted average (TWA) under any foreseeable conditions.

Definitions

To help employees better understand ENI Mechanical's policy on respirable crystalline silica and the related OSHA standard, there are a number of definitions to keep in mind:

- **The action level** refers to a concentration of airborne respirable crystalline silica of 25 $\mu g/m^3$, calculated as an eight-hour TWA. Silica exposures at or above this concentration trigger requirements for exposure assessments.
- **The competent person** is an individual capable of identifying existing and foreseeable respirable crystalline silica hazards in the workplace. This individual has the authority to take prompt corrective measures to eliminate or minimize these hazards. Per the standard, employers must designate a competent person to inspect job sites, materials and equipment as well as implement written exposure control plans.
- **A high-efficiency particulate air (HEPA) filter** is a filter that is at least 99.97% efficient in removing mono-dispersed particles of 0.3 micrometers in diameter. HEPA-filtered vacuuming is an example of a housekeeping method used to minimize employee exposure to respirable crystalline silica. Some Table 1 tasks require HEPA-filtered vacuuming.
- **Crystalline silica** is a mineral commonly found in natural materials like sand, rock and stone. It can also be found in made-made materials like concrete, tile, brick and mortar. When workers cut, grind, drill or crush materials that contain crystalline silica, very small and potentially hazardous dust particles are created. This is known as **respirable crystalline silica**.
- **Objective data** is information based on the composition of a substance that demonstrates employee exposure to respirable crystalline silica. This data relates to a particular product, material, process, task or activity. Per the language of the standard, objective data must "... reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices and environmental conditions in the employer's current operations."
- **OSHA standard 29 CFR 1926.1153** requires employers to limit worker exposures to respirable crystalline silica and take steps to protect workers. Employers can independently decide which dust controls work best to limit exposures in their workplaces or use a control method laid out in Table 1 of the construction standard.
- **Table 1** matches common construction tasks with dust control methods. The silica dust control measures listed in the table include methods known to be effective, such as using water to keep dust from getting into the air or using ventilation to capture dust.
- **The permissible exposure limit (PEL)** is the legal limit for employee exposure to a chemical substance or physical agent. ENI Mechanical must protect workers from respirable crystalline silica exposures above the PEL of 50 $\mu g/m^3$ (old limit was 250 $\mu g/m^3$).
- **Physician or other licensed health care professional (PLHCP)** refers to an individual whose legally permitted scope of practice (e.g., license, registration or certification) allows them to provide some or all of the particular health care services required by the medical surveillance requirements of the standard.

Responsibilities

ENI Mechanical is committed to protecting the health and safety of employees. In order to support this commitment, it's critical that relevant parties understand their unique responsibilities when it comes to respirable crystalline silica.

Management (e.g., project managers, safety departments and site managers) is expected to:

- Designate a competent person(s).
- Ensure employees are trained on silica hazards.
- Provide tools and equipment with engineering controls to reduce exposures.
- Perform hazard assessments to determine if an employee's exposure will be above 25 µg/m^3 as an eight-hour TWA under any foreseeable conditions.
- Select and implement control measures in accordance with the construction tasks identified in Table 1.
- Maintain written records of training practices, exposure control plans, inspections, medical surveillance, respirator medical clearances and fit-test results.
- Ensure that work is conducted in a manner that minimizes and adequately controls the risk to workers and others.
- Restrict housekeeping practices that expose workers to silica where feasible alternatives are available.

The competent person is expected to:

- Make frequent and regular inspections of job sites, materials and equipment to implement the written exposure control plan.
- Identify existing and foreseeable hazards in the workplace and take prompt corrective measures to eliminate or minimize them.
- Notify management of any issues identified during inspections in order to coordinate and facilitate prompt corrective actions.
- Assist management in conducting job site and hazard assessments to determine if an exposure control plan, exposure monitoring and medical surveillance is necessary.

Employees are expected to:

- Follow work procedures established in exposure control plans and this policy.
- Use personal protective equipment in an effective and safe manner.
- Participate in exposure monitoring and the medical surveillance program.
- Report any unsafe conditions to management and the competent person.
- Understand the signs and symptoms of silica illnesses. Report any exposure incidents, or any signs or symptoms of illness to management and the competent person.

Specified Exposure Controls and Alternative Exposure Control Methods

ENI Mechanical, in accordance with applicable OSHA standards, will take a number of actions to limit worker exposures to respirable crystalline silica. There are effectively two methods ENI Mechanical considers—specified exposure controls and alternative exposure controls.

Specified Exposure Controls

These types of controls refer to Table 1, which matches common construction tasks with dust control methods. The dust control measures listed in the table include methods known to be effective, such as using water to keep dust from getting into the air or using ventilation to capture dust.

Table 1 uses a combination of engineering controls, work practices and personal protective equipment (PPE) to protect employees. Table 1 is the preferred method of control, and, should ENI Mechanical choose not to comply with Table 1 for any reason, air monitoring and alternative protections will be required.

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

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	> 4 hours/shift
1	Stationary masonry saws	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
2a	Handheld power saws (any blade diameter) when used outdoors	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
2b	Handheld power saws (any blade diameter) when used indoors or in an enclosed area	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
3	Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less) for tasks performed outdoors only	• Use saw equipped with commercially available dust collection system. • Operate and maintain 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.	None	None
4a	Walk-behind saws when used outdoors	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
4b	Walk-behind saws when used indoors or in an enclosed area	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
5	Drivable saws for tasks performed outdoors only	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
6	Rig-mounted core saws or drills	• Use tool equipped with integrated water delivery system that supplies water to cutting surface. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	> 4 hours/shift
		emissions.		
7	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 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
8	Dowel drilling rigs for concrete for tasks performed outdoors only	• Use shroud around drill bit with a dust collection system. • Dust collector must have a filter with 99% or greater efficiency and a filter cleaning mechanism. • Use a HEPA-filtered vacuum when cleaning holes.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
9a	Vehicle-mounted drilling rigs for rock and concrete	• Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector.	None	None
9b	Vehicle-mounted drilling rigs for rock and concrete	• Operate from within an enclosed cab and use water for dust suppression on drill bit.	None	None
10a	Jackhammers and handheld powered chipping tools when used outdoors	• Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10b	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	• Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10c	Jackhammers and handheld powered chipping tools when used outdoors	• Use tool equipped with commercially available shroud and dust collection system. • Operate and maintain 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.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10d	Jackhammers and	• Use tool equipped with commercially available	N95 (or	N95 (or

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	> 4 hours/shift
	handheld powered chipping tools when used indoors or in an enclosed area	shroud and dust collection system. • Operate and maintain 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.	Greater Efficiency) Filtering Facepiece or Half Mask	Greater Efficiency) Filtering Facepiece or Half Mask
11	Handheld grinders for mortar removal (i.e., tuckpointing)	• Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	Powered Air-Purifying Respirator (PAPR) with P100 Filters
12a	Handheld grinders for uses other than mortar removal for tasks performed outdoors only	• Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
12b	Handheld grinders for uses other than mortar removal when used outdoors	• Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	None	None
12c	Handheld grinders for uses other than mortar removal when used indoors or in an enclosed area	• Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
13a	Walk-behind milling machines and floor grinders	• Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. • Operate and maintain tool in accordance with	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	> 4 hours/shift
		manufacturer's instructions to minimize dust emissions.		
13b	Walk-behind milling machines and floor grinders	• Use machine equipped with dust collection system recommended by the manufacturer. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. • When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.	None	None
14	Small drivable milling machines (less than half-lane)	• Use a machine equipped with supplemental water sprays designed to suppress dust. • Water must be combined with a surfactant. • Operate and maintain machine to minimize dust emissions.	None	None
15a	Large drivable milling machines (half-lane and larger) for cuts of any depth on asphalt only	• Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. • Operate and maintain machine to minimize dust emissions.	None	None
15b	Large drivable milling machines (half-lane and larger) for cuts of 4 inches in depth or less on any substrate	• Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. • Operate and maintain machine to minimize dust emissions.	None	None
15c	Large drivable milling machines (half-lane and larger) for cuts of 4 inches in depth or less on any substrate	• Use a machine equipped with supplemental water spray designed to suppress dust. • Water must be combined with a surfactant. • Operate and maintain machine to minimize dust emissions.	None	None
16	Crushing machines	• Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyers, sieves/sizing or vibrating components, and discharge points). • Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions. • Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station.	None	None
17a	Heavy equipment and utility vehicles used to abrade or fracture silica-containing	• Operate equipment from within an enclosed cab.	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	> 4 hours/shift
	materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials			
17b	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	• When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
18a	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading or fracturing silica-containing materials	• Apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
18b	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading or fracturing silica-containing materials	• When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.	None	None

Alternative Exposure Control Methods

For any tasks not accounted for in Table 1 or where ENI Mechanical cannot properly implement specified exposure controls, alternative exposure control methods will be used. Using alternative exposure control methods, ENI Mechanical will ensure employees' exposures to respirable crystalline silica do not exceed the PEL (50 µg/m^3 as an eight-hour TWA).

What's more, [C_Officalname] will assess the exposure of each employee who is or could be exposed to respirable crystalline silica at or above the action level in accordance with either the performance option or the scheduled monitoring option:

- **Performance option**—ENI Mechanical will assess the eight-hour TWA exposure for each employee using a combination of air monitoring or objective data. Exposures will be reassessed whenever a change in production, process, control equipment, work practices or personnel occurs, particularly if the change could have an impact on silica dust exposures. ENI Mechanical will notify workers within five days of receiving assessment results. ENI Mechanical will notify each employee in writing or post the results in a location that all affected employees can access. When an exposure assessment reveals exposures above the PEL, the written notification will describe the corrective action ENI Mechanical will take to reduce employee exposures to or below the PEL.

- **Scheduled monitoring option**—The scheduled monitoring option lets ENI Mechanical know when and how often they must perform exposure monitoring to measure employee exposures. When following the scheduled monitoring option, ENI Mechanical will ensure:
    - Results represent the employee's TWA exposure to respirable crystalline silica over an eight-hour workday.
    - Samples are collected from the employee's breathing zone.
    - Samples are collected outside respirators so that they represent the exposure that would occur without the use of the respirator.

Respiratory Protection

Where respiratory protection is required, ENI Mechanical will provide each employee an appropriate respirator that complies with any applicable requirements as part of our respirator program. Situations requiring respiratory protection include, but are not limited to, the following:

- Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls
- Where exposures exceed the PEL during tasks for which engineering and work practice controls are not feasible
- During tasks for which an employer has implemented all feasible engineering and work practice controls, and such controls are not sufficient to reduce exposures to or below the PEL

Housekeeping

The following are housekeeping practices of note:

- Dry sweeping or dry brushing is prohibited where such activity could contribute to respirable crystalline silica exposures. Wet sweeping, HEPA-filtered vacuuming or other methods that minimize the likelihood of exposure are preferred.
- Compressed air should not be used to clean clothing or surfaces where such activity could contribute to respirable crystalline silica exposures, unless:
    - The compressed air is used in conjunction with a ventilation system that effectively captures the dust created by the compressed air.
    - No alternative method is feasible.

Medical Surveillance

Per the standard, ENI Mechanical must offer medical exams within 30 days of an assignment (the day the employee starts working in a job/task in which they are required to wear a respirator for 30 or more days per year). The exams must be offered every three years and must include chest X-rays and lung function tests.

These exams can determine if employees have a disease related to silica exposure. This allows workers to take actions to protect their health. What's more, medical surveillance can determine whether workers have any condition, such as a lung disease, that is not caused by silica exposure but that might make them more sensitive to silica exposure.

It should be noted that reports given to employers and employees are different, to ensure worker privacy. The table below outlines the differences in these reports:

Employee Reports Include	Employer Reports Include
• Medical conditions • Recommended limitations on respirator use and exposure to silica • Recommendations for specialist exams	• Recommended respirator limitations • The following, with employee consent: o Recommended exposure limitations o Recommendations for specialist exams

Hazard Communication

ENI Mechanical will include respirable crystalline silica in the company's hazard communication program. Employees will have access to labels on containers of crystalline silica as well as any relevant safety data sheets.

All employees will be trained in accordance with the provisions of the OSHA Hazard Communication Standard. Employees who could be exposed to silica at or above the action level must be able to demonstrate knowledge and understanding of:

- The health hazards associated with exposure to respirable crystalline silica.
- Specific tasks in the workplace that could result in exposure to respirable crystalline silica.
- Specific measures ENI Mechanical has implemented to protect employees from exposure to respirable crystalline silica, including engineering controls, work practices and respirators to be used.
- The contents of the respirable crystalline silica construction standard.
- The identity of the competent person.
- The purpose and a description of the company's medical surveillance program.

ENI Mechanical will make a copy of the OSHA Respirable Crystalline Silica Construction Standard and ensure it is readily available without cost to any employee who requests it.

Recordkeeping

ENI Mechanical will make and keep accurate records of air monitoring data, objective data and medical surveillance. The following highlights what each record will include/identify:

Air Monitoring Data

- The date of the measurement for each sample taken
- The task monitored
- Sampling and analytical methods used
- The number, duration and results of samples taken
- The identity of the laboratory that performed the analysis
- The type of PPE used
- The name, Social Security number and job classification of all employees represented by the monitoring, indicating which employees were actually monitored

Objective Data

- The crystalline silica-containing material in question
- The source of the objective data
- The testing protocol and results of testing
- A description of the process, task or activity on which the objective data was based
- Any other data relevant to the process, task, activity, material or exposures on which the objective data was based

Medical Surveillance

- The employee's name and Social Security number
- A copy of the PLHCPs' and specialists' written opinions
- A copy of the information that the employer is required to provide to the PLHCPs and specialists

Employee Acknowledgment

At ENI Mechanical, the safety of our employees is our greatest concern. We want you to feel confident in your security while you are on the job site, which is why we established this policy.

All employees are expected to understand and actively participate in these safety procedures, guidelines and requirements. ENI Mechanical encourages its employees to take a proactive approach in identifying potential problems or violations by promptly reporting them to their supervisor.

Prior to working on any ENI Mechanical job site, each employee is expected to have read the entire Respirable Crystalline Silica Policy. If you have any uncertainty or questions regarding the content of this policy, you are required to consult your supervisor. This should be done prior to signing and agreeing to the ENI Mechanical Respirable Crystalline Silica Policy.

I have read and understand ENI Mechanical's Respirable Crystalline Silica Policy, and I understand the requirements and expectations of me as an employee. I will do everything within my power to keep myself and my co-workers away from hazards while working with respirable crystalline silica, because I know site safety is everyone's responsibility.

Employee Signature Date