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COMPREHENSIVE
SAFETY PROGRAM
AND POLICIES

"Working Toward 100% Employee Engagement"

JANUARY 2014

TABLE OF CONTENTS

SAFETY AND HEALTH POLICY STATEMENT

At the Edw. C. Levy Group of Companies we believe that safety is a value. This means that we rank safety as important as production, profitability, cost control, quality, and environmental compliance. As a value, safety is not an option; it is a requirement of employment, just the same as coming to work on time and not stealing. Management recognizes that our employees have values as well, generally centered on family and friends. To help you protect this value, and to provide direction to keep you safe and healthy, we have developed and implemented specific safety & health programs and job safety instructions throughout the organization. It is our strong desire that you return home to your family at the end of the day in the same physical condition in which you left them to come to work. This effort is a partnership between you and the company. We both have responsibilities in order to keep all employees safe.

How this responsibility is shared:

- ⇨ Our responsibility as a company is to provide you with the instructions, tools and equipment to perform your job safely.
- ⇨ Your responsibility is to follow the instructions and use the tools and equipment in a safe and proper manner.

Working together we can keep our company a great place to work. It is our expectation that you will hold yourself accountable to your responsibilities and to protect your personal values. In the event you fail to do this, the Company will hold you accountable. As stated earlier, we want you, and all of our employees, to be safe and healthy while working.

Your specific personal protective equipment needs, job instructions, work rules, and similar items will be provided by the specific area/department where you are assigned. If you ever find yourself in a situation where you're unsure if a job can be performed safely, it is your duty to speak up and ask questions. Questions regarding your safety can be answered by your supervisor, the local safety representative, or a member of Human Resources.

LEVY MISSION STATEMENT

The Edw. C. Levy Companies will:

- Supply our employees with a safe and secure work environment and equip them with the tools to enable them to meet their individual objectives.

- Enrich our culture through trust, teamwork, individual initiative, high expectations, active involvement, and open communications.

- Promote innovation and harvest ideas at all levels of the organization to foster personal growth and continuous corporate improvement.

- Grow our business through marketing, research, and technological advances, while recycling and using the Earth's natural resources in a manner, which enhances the quality of life.

- Repay the communities that support us by operating safe and environmentally sound businesses while sharing our success with worthy charitable causes.

- Observe standards of moral and ethical conduct, which will easily withstand and public or private scrutiny.

- Always treat others the way we would wish to be treated and work hard to gain the same treatment from them.

INTRODUCTION

This booklet has been adopted to help you in assuring the general safety, health and well being of yourself and all others who may come in contact with our company.

You, as an employee, are not only responsible for your own safety, but also the safety of other employees around you. Last, but not least, you are also responsible for the safety of the public, who may find themselves in your area, unknowing of the hazards that exist.

By signing the acknowledgement page for this book, you agree to comply not only with the Safety Rules and Safe Practices contained herein, but also any Federal, State and Local codes, whenever applicable.

Your safety is everyone's concern and everyone's safety is your concern.

SAFETY AND HEALTH OBJECTIVES

Ace-Saginaw Paving Co. plans to achieve employee safety and health through the following:

1. Using a qualified safety person
2. Making regular and random safety inspections
3. Enforcing the use of safety equipment
4. Following safety procedures and rules
5. Providing on going safety training
6. Enforcing safety rules by using appropriate discipline

COMPANY POLICIES

The following list of policies does not include every Company policy, but it does include those relevant to the Safety Program.

SECURE WORKPLACE POLICY

PURPOSE

One of the goals of the Edw. C. Levy Group of Companies is to: "Supply our employees with a safe and secure work environment". In order to achieve this goal it is necessary to have cooperation from all employees. We expect the highest standard of moral conduct from all employees. We expect the highest standard of moral conduct from, and respect for, each individual in the workplace.

Therefore, to protect the well being and rights of all employees, customers, and suppliers, the following rules are being posted. Violation of any of these rules will result is disciplinary action, up to and including termination of employment. If severe, the Company may seek criminal prosecution.

The following conduct is strictly prohibited:

1. Racial, sexual or other harassment including, but not limited to, abusive language, threats, intimidation or coercion.
2. Any acts of physical violence directed towards individuals or property.
3. Possession of any weapons or explosives while on duty or on Company or customer property or in Company owned vehicles.

Also, employees shall not enter the Company premises unless they are scheduled to work or are otherwise authorized by management.

* The above is not an all-inclusive list of activities considered to be contrary to the maintenance of a safe and secure work environment.

YOUR RESPONSIBILITY

Your responsibility as an employee is to report any violation of the above rules to site supervision immediately. Operations management shall notify the human resources Director who will investigate the circumstances. The alleged offender may be suspended pending the results of the investigation. The Company reserves the right to take action, as it deems appropriate regarding violations of this policy.

SEXUAL HARASSMENT POLICY

PURPOSE
To state the Company Policy prohibiting the sexual harassment of employees.

SCOPE
All Employees

GENERAL
It is the policy of the Edw. C. Levy Co., its divisions, affiliates and subsidiaries to provide and maintain a workplace for each of its employees, which is free from sexual harassment.

DEFINITION
Sexual harassment includes unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature when individual's employment, submission to or rejection of such a conduct is used as the basis for employment decisions affecting the individual, or the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

PROCEDURE
Employees who believe they are being subjected to sexual harassment, or who receives allegations of harassment from an employee, must immediately advise the Director of Human Resources, and assist in any subsequent investigation.

DRUG AND ALCOHOL FREE WORK PLACE POLICY

BACKGROUND
The manufacture, distribution, dispensation, possession, testing positive for, use of, or under the influence of any controlled substance while in the employ of the Company is strictly prohibited.

DEFINITIONS
The term "controlled substance" refers to drugs and chemical substances such as, but not limited to, alcohol, marijuana, cocaine, opiates, amphetamine, phencyclidine, etc.

EMPLOYEE RESPONSIBILITY
Each employee is encouraged to report confidentially, or anonymously, on any drug supply in the work place to the HUMAN RESOURCES DEPARTMENT or SECURITY DEPARTMENT (or designate). Information received in this manner will be fully investigated before any action is taken.

COMPANY RESPONSIBILITY
The Company retains the right to authorize or conduct searches on Company property and the prerogative to contact law enforcement agencies when most appropriate.

A. TESTING PROCEDURE

- ⇨ All candidates for employment must submit to a new hire drug screen as part of their physical examination.
- ⇨ Any employee who gives a supervisor reasonable cause to suspect substance or alcohol abuse must submit to a drug and alcohol test.
- ⇨ All return to work physicals include a drug screen as required by the return to work physical policy.
- ⇨ Any employee who is enrolled in a substance abuse treatment program must submit to a drug or alcohol screen when requested by the CORPORATE BENEFIT or HUMAN RESOURCES DEPARTMENT.
- ⇨ Ay employee in a sensitive position, as defined by federal or state regulations, must submit to a drug/alcohol test as required by those regulations.

B. CONSEQUENCES - TESTING POSITIVE OR REFUSING TO SUBMIT TO TESTING.
Testing positive on a urine drug screen and/or breath alcohol test, or refusing to submit to testing will be considered gross misconduct and subject to immediate discharge. An employee who wishes to seek rehabilitation must contact the EMPLOYEE ASSISTANCE PROGRAM or the BENEFITS ADMINISTRATOR prior to being requested to report to the collection site for a urine drug screen/alcohol test.

C. OTHER - COMPANY RESPONSIBILITY.
The Company will comply with all statutes that impose equal or greater requirements (i.e. Drug Free Workplace Act of 1988, DOT Regulations) on employees and employers to maintain a safe workplace. Any supervisor should contact the CORPORATE HUMAN RESOURCES DEPARTMENT for clarification and interpretation of those regulations.

SMOKE FREE ENVIRONMENT POLICY

Smoke free is now the normal expectation in many community public areas.

1991 reports from both OSHA and the EPA conclude that "workers should not be involuntarily exposed to tobacco smoke".

While the rights of smokers are recognized, our obligation to non-smoking employees must also be met. As far as practicable, employees must be protected from unwanted exposure to tobacco smoke.

Therefore, smoking is prohibited in all offices, meeting rooms, cafeterias, or other similar enclosed work areas.

It's important that all employees be treated equally. We must eliminate favoritism for smokers or non-smokers. Break policies and enforcement of such should be consistent.

FRAUD POLICY

BACKGROUND

The Corporate Fraud Policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against the Edward C. Levy Group of Companies ("Company").

SCOPE OF POLICY

This policy applies to any irregularity, or suspect irregularity, involving employees as well as shareholders, consultants, vendors, contractors, outside agencies, doing business with employees of such agencies, and/or any other parties with a business, relationship with the Company.

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company.

POLICY

Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury.

Any irregularity that is detected or suspected must be reported immediately to any Corporate Officer and/or Director of Security, who coordinates all investigations both internal and external.

The reporting individual shall not:

- ⇨ Contact the suspected individual in an effort to determine facts or engage in any type of investigation.
- ⇨ Discuss the case, facts suspicions, or allegations with anyone unless specifically asked to do so by Management or Security Department.

ACTIONS CONSTITUTING FRAUD

The terms, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- ⇨ Any dishonest or fraudulent act
- ⇨ Misappropriation of funds, securities, supplies, or other assets
- ⇨ Impropriety in the handling or reporting of non-financial transactions
- ⇨ Conflict of Interest (Owner, Partnership, Registered Agent or Employee of a company that is a vendor to The Edw. C. Levy Group of Companies)
- ⇨ Profiteering as a result of insider knowledge of company activities
- ⇨ Disclosing confidential and proprietary information to outside parties
- ⇨ Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the company. Exception: Gifts less than $100.00 in value, normal business entertainment items when associated with a business meeting
- ⇨ Destruction, removal, or inappropriate use of records
- ⇨ Any similar or related irregularities, and/or
- ⇨ Any similar or related acts

VEHICLE CELL PHONE USE POLICY

PURPOSE
To eliminate or significantly reduce the likelihood of driving distractions related to cell phone usage.

SCOPE
This policy is applicable to all employees and other persons using company provided automobiles and pickup trucks or personal vehicles on company business.

RESPONSIBILITIES
Safe operation of automobiles and pickup trucks requires constant driver attention, good judgment and common sense. All employees of the Edw. C. Levy Co. Group of Companies using company provided automobiles and pickup trucks or personal vehicles on company business are required to use a "hands-free" cell phone device when operating both a cell phone and the vehicle.

Some states, counties and cities have made the use of cell phones while operating vehicles illegal and it is the employees' responsibility to be aware of these regulations.

Violations of this policy may result in suspension of company vehicle privileges, disciplinary action up to and including termination.

CDL CELL PHONE USE POLICY

PURPOSE
To comply with U.S. Department of Transportation regulations banning cell phone usage while operating a commercial motor vehicle, and to reduce driving distractions related to cell phone usage.

SCOPE
This policy is applicable to all employees that operate a truck with a commercial driver's license.

RESPONSIBILITIES
In accordance with Department of Transportation effective January 1, 2012 the company prohibits commercial drivers from using hand-held mobile phones, push-to-talk phones, or texting on cell phones while operating a commercial truck. The use of hands free devices and CB radios are still allowed.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

It is the policy of Ace–Saginaw Paving Co. to assure that applicants are employed and that employees are treated during employment without regard to their race, religion, sex or color. Such action shall include employment; upgrading; demotion or transfer; recruitment or recruitment advertising; lay-off or termination; rate of pay or other forms of compensation and selection for training including apprenticeship, pre-apprenticeship or on-the-job training.

EMPLOYMENT AT WILL POLICY

BACKGROUND

While most employment relationships are long and rewarding, at times employees may seek job opportunities elsewhere or choose to leave the Company for other reasons. Likewise, others may not fill the operational needs or circumstances of the Company, which may result in involuntary termination.

PURPOSE

Therefore, it is recognized the Company has not entered into any contracts with employees, express or implied, unless specifically negotiated by a collective bargaining agreement. It is further recognized that employment and compensation can be changed or terminated, with or without cause, and with or without notice, at anytime, at the option of the Company.

EXCEPTIONS

Exceptions to this policy can only be approved, in writing, by the Vice President of Human Resources.

ACE-SAGINAW PAVING CO. DISCIPLINARY PROGRAM

1. SAFETY	
A. Failure to obey basic safety practices as required by MSHA, OSHA, MDOT, or other state regulatory agencies, in the Employee Safety and Health Manual, or to obey safety rules and regulations including posted signs and warnings (other than those listed in C below) B. Failure to follow company policy on cell phone usage.	1st offense – Reprimand 2nd offense – Reprimand 3rd offense – Subject to Discharge
C. "Serious" Safety Violation D. Failure to report incidents immediately to direct supervisor.	Subject to Discharge
2. EQUIPMENT OPERATION	
A. Minor chargeable incident of equipment or property damage [1] B. Failure to properly complete and submit required paperwork C. Failure to follow traffic laws	1st offense – Reprimand 2nd offense – Reprimand 3rd offense – Subject to Discharge
D. Major chargeable incident of equipment or property damage [1] E. Unauthorized use of company premises or company-owned motor vehicles F. Employees not authorized to work (layoff, termination) shall refrain from entering company and/or customer property without authorization.	Subject to Discharge
3. CONDUCT	
A. Proven theft or dishonesty of any kind	Subject to Discharge
B. Refusal to perform assigned work	Voluntary Quit
C. Failure to follow through assigned task or insubordination D. Sleeping while on duty **E.** Use of inappropriate language on company phones or radio (including text)	1st offense – Reprimand 2nd offense –Subject to Discharge
4. SECURE WORKPLACE– See policy	
A. Racial, sexual or other harassment including, but not limited to, abusive language, threats, intimidation or coercion B. Any acts of physical violence directed toward individuals or property C. Possession of a weapon while on duty or on company and/or customer property	Subject to Discharge
5. DRUG AND ALCOHOL FREE WORKPLACE – See policy for definitions/procedures	
A. Employees are forbidden to use, manufacture, distribute, dispense, possess, test positive for, or be under the influence of any controlled substance while performing work or while on company property or equipment	Discharge
6. ATTENDANCE	
A. Absent without prior notice* * Excessive absences with prior notice and arriving late / leaving early will be addressed, depending on frequency	1st offense – Reprimand 2nd offense – Reprimand 3rd offense – Subject to Discharge
B. Failing to report to work for 3 consecutive days without notice	Voluntary quit

Ace-Saginaw Paving Co. reserves the right to deny any employee permission to work if it is the employer's opinion that the employee's condition will adversely affect their work performance or safety.

This list is not all-inclusive and not intended to specifically mention every possible prohibited action for maintaining a safe and secure operation. The severity of each offense will be considered when determining corrective action.

[1]Minor/Major incidents will be defined by severity of damage incurred and/or potential risk to people and property.

The Company Incident Review Board will determine the severity of the offenses and will make disciplinary recommendations to the executive management who will proceed with the reprimand up to and including discharge. The IRB will consist of all departmental supervisors including General Managers and the Safety Manager.

SAFETY RULES

For your own safety and the safety of those around you, Know and Follow these general Safety and Health Rules. If you always plan and think of how to safely do your job, you will always act and work safely. Safety is everyone's responsibility – on and off the job.

1. All accidents, incidents or injuries, no matter how slight, must be reported to your supervisor immediately.
2. Anticipate possible dangers in your operation and make every effort to avoid these dangers or hazards.
3. All unsafe conditions, such as tools, equipment, work areas and structures are to be reported to your supervisor immediately. These conditions shall include all existing and predictable physical, health and ergonomic hazards.
4. Watch out for the safety of visitors, new employees and co-workers. Never hesitate to tell them if they are not in a safe situation.
5. Observe and obey all safety rules and warning signs in the area or plant that you are working.
6. Get full instructions on work to be performed before starting the job.
7. Make sure you know the emergency plan at each site or plant that you are working at.
8. Never remove or make safety devices inoperative.
9. Horseplay, practical jokes, throwing of objects, scuffling, fighting or distracting another employee is strictly prohibited.
10. Inspect daily any equipment to which you are assigned to make certain that it is in safe operating condition.
11. Leave repair work to those who are trained and qualified to make repairs.
12. Never lean against or sit on temporary or permanent handrails of any kind or any other unstable structure.
13. Rain, snow, ice or overhanging icicles may represent slipping or struck-by hazards. When such hazards exist in your work area, take care of them or report them immediately.
14. The use of headphones with portable radios, disc players or MP3 players are prohibited.
15. Personal cell phone use is prohibited while working except in an emergency.
16. All personnel must wear appropriate protective personal protective equipment to the tools or equipment being used.
17. No person shall smoke or use an open flame within (50) fifty feet of any flammable liquid, material, gas or explosives.
18. At no time shall anyone smoke in a restricted area or in an area where there is a possibility of a combustible or explosive mixture of vapors or gases (e.g. gas pumps, cylinder storage areas, solvent and paint storage areas).
19. Smoking is allowed in designated areas only. Dispose of materials in proper receptacles.
20. Always lift correctly, use your legs to take the strain not your back.
21. Stay clear of blind spots around equipment, loaders, trucks, cranes and conveyors.
22. It is the duty of every employee to see that their work area meets the best standards of safety, cleanliness and neatness.
23. Check all cords on electrical tools to be sure they are properly grounded and not frayed or broken. Do not use if found to be defective.

24. Know where fire extinguishers are located and how to operate them.
25. Secure in an upright position all tanks and cylinders of oxygen, acetylene, propane or other compressed gases.
26. Transport all tanks of oxygen, acetylene, propane or other compressed gases upright with the gauges removed and safety caps on the tanks.
27. Check all hand tools for safe condition before using them. Do not use if defective.
28. Do not use defective ladders. Defective ladders shall be tagged and/or removed form service.
29. Ladders should be stored properly and not placed in passageways or any other location where they may be displaced unless protected by barricades or guards.
30. Be alert for moving vehicles and/or equipment.
31. Never hitch a ride or pick up riders on moving equipment.
32. Always use the right tools for the job.
33. Never adjust or service equipment that is in operation, unless it has adequate safe guards to permit such work safely.
34. Do not store or transport cans of gasoline or other flammable liquids in the cab of any equipment or motor vehicle.
35. After a job is finished, replace guards, clean up debris, return any left over parts and put tools away.
36. When using an overhead hoist or crane, be sure you know how to operate them safely and watch out for other personnel in the area.
37. Any area with an overhead crane in operation is a hard-hat area.
38. Never direct compressed air towards yourself or anyone else for any reason.
39. Compressed air for cleaning purposes shall not exceed 30psi, and then only with proper guarding and personnel protective equipment.
40. Equipment should be operated only by a qualified and authorized employee, and in a safe and efficient manner.
41. Do not pass under any suspended load or bucket.
42. Do not work under any piece of equipment held only by a jack.
43. Any equipment capable of being raised must stay a <u>minimum</u> of 10 feet from <u>any</u> overhead wire. **Note:** Higher voltages require distances greater than 10 feet to be maintained.

CLOTHING AND JEWELRY

44. The wearing of shorts, cutoffs, sleeveless t-shirts, etc. is against company policy. Light colored, loose weave clothing that promotes evaporative cooling and protects the extremities from abrasions, cuts, sunburn, etc., is recommended.
45. Pants must extend at least to the ankle.
46. Shirts must at a minimum cover the shoulder. Where burning, cutting and welding are taking place, and in any other operations where rules specify, flame resistant clothing shall be worn. Do not wear synthetic clothing when performing any hot work.
47. Do not wear clothing that is loose fitting, torn or ragged to avoid being caught on projections or being caught in moving machinery. Do not wear gloves or loose clothing around moving machinery.
48. Wearing of finger rings, loose fitting wrist bracelets, exposed dangling necklaces and earrings that dangle is prohibited in all operating areas.

JOB SITE INSPECTIONS

Ace-Saginaw Paving Co. believes that site inspections and audits are a crucial process in the safety program. A minimum of monthly inspections are expected at each stationary site and each work crew regardless of their site area.

The Safety Manager and/or another designated person will tour each job site and observe potential safety and health hazards, including the potential hazards of confined spaces and develop a plan for safeguarding the Company's employees which may include the following:

- ⇨ Removing the hazard
- ⇨ Guarding against the hazard as required by MIOSHA Standards
- ⇨ Providing personal protective equipment and enforcing its use
- ⇨ Training employees in safe work practices
- ⇨ Coordinating protection of employees through other contractors

A record of all safety inspections and corrective actions will be kept on file.

ACCIDENT PREVENTION SIGNS

DANGER SIGNS

Example:

DANGER
HIGH VOLTAGE

Danger signs are used only where immediate hazards exist. Warn of specific hazards and indicate special precautions are necessary. The word "Danger" is in white letters in a red oval with a black panel and the instructions are in black letters on a white background.

CAUTION SIGNS

Example:

CAUTION
TRUCK TRAFFIC

Caution signs warn of potential hazards or unsafe practices and indicate that proper precautions should be taken. The background is yellow with black letters, and the panel is black with yellow letters.

SAFETY INSTRUCTION SIGNS

Example:

SAFETY FIRST
EYEWASH

Safety instructions signs are used where there is a need for general instructions and suggestions relative to safety measures. The background is white with black letters and the panel is green with white letters. The words in the panel may say, "Think", "Be Careful", "Safety First", etc.

ACCIDENT PREVENTION TAGS

Example:

DANGER
DO NOT OPERATE

Temporary warning tags may be used on valves, switches on equipment found unsafe, etc. They are not intended to be substitute for other established safety precautions, e.g. lockouts.

In areas where health or safety hazards exist that are not immediately obvious to all employees, barricades, and/or signs must be posted at all approaches to that area.

PERSONAL PROTECTIVE EQUIPMENT

PURPOSE
To document the hazard assessment, measure in-place and personal protective equipment requirements.

SCOPE
All employees covered under MIOSHA regulations and any on-site contractor.

PROCEDURE
Ace-Saginaw Paving Co.'s written PPE procedure will cover all the individual aspects of this regulation in detail.

PURPOSE OF PROGRAM:

- The purpose of this Personal Protective Equipment (PPE) Program is to document the hazard assessment measures in place and PPE in use at Ace-Saginaw Paving Co. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls. PPE will only be used to provide protection against hazards, which cannot reasonably be abated otherwise.

GENERAL:

- MIOSHA regulates the use of PPE in many of its standards and this procedure is meant to consolidate all PPE requirements into one standard procedure (excluding respirators, see respirator procedure). Ace-Saginaw Paving Co. must assure that their employees are protected from all hazards that cannot be engineered out of an operation and that the PPE selected is of a safe design and properly fitted to all employees.

- Where employees provide their own PPE the company is still responsible to assure its adequacy, including proper maintenance, and sanitation of such equipment.

- Defective or damaged PPE shall not be used and must be replaced immediately.

- All employees will be trained by the company on the PPE that they must use in the performance of their jobs.

- You are responsible for the proper use and care of all PPE issued to you. Any alteration of PPE in any way is prohibited. Always check your equipment before each use to ensure it is sanitary and in reliable condition, replace if needed. Report defects to your supervisor immediately.

HAZARD ASSESSMENT:

- In order to select the appropriate PPE, an assessment will be conducted to determine if hazards are present that necessitate their use. The assessment must thoroughly evaluate all hazards. Written documentation will be kept on file. Prior to conducting a site survey,

the facility shall review its past incident files, i.e. MIOSHA 300 Form, to determine incidents where the PPE utilized was either inadequate or improperly worn.

- ⇨ The Company Safety Manager will provide guidance and assistance as needed.

- ⇨ During the Hazard Assessment, the designated person shall observe the following:
    1. Sources of motion: i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects.
    2. Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment etc.
    3. Types of chemical exposures.
    4. Sources of harmful dust.
    5. Sources of light radiation, i.e., welding, brazing, cutting, furnaces, high intensity lights, etc.
    6. Sources of falling objects or potential for dropping objects.
    7. Sources of sharp objects that may pierce the feet or cut the hands.
    8. Sources of rolling or pinching objects, which could crush the feet.
    9. Layout of workplace and location of co-workers.
    10. Any electrical hazards

ORGANIZING AND ANALYSIS OF DATA:

- ⇨ Following the walkthrough survey, each facility shall organize the data and analyze it to determine the selection of proper PPE. Each of the basic hazards shall be reviewed and the determination made as to the type, level of risk, and seriousness of potential injury from each of the hazards at that location. The possibility of exposure to several hazards at one time should be considered, i.e., welding requires protective gloves, welding helmet with the proper shaded lens, barrier protection where other employees may be exposed to the flash, ventilation, etc.

- ⇨ The employees who will need to wear the PPE should be consulted as to any restraints that could occur, i.e., can the employee wear a respirator and hearing protection at the same time? Does the employee require prescription glasses? Are they industrial rated?

CERTIFICATION OF HAZARD ASSESSMENT:

- ⇨ MIOSHA requires that each facility must perform an evaluation of its site. Certify in writing the person who performed the assessment and the date of the assessment.

SELECTION GUIDELINES:

- ⇨ The general procedure for selection of protective equipment is to:
    1. Become familiar with the potential hazards and the types of protective equipment (PPE) that are available, and what they can do.
    2. Compare the hazards associated with the environment.
    3. Select the PPE, which ensures a level of protection greater than the minimum required to protect employees from the hazards.

4. Fit the user with the proper, comfortable, well-fitting protective device and give instructions on care and use of the PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE.

EMPLOYEE TRAINING:

- ⇨ Ace-Saginaw Paving Co. will provide training to each employee who is required to use PPE. Employees will receive retraining when any of the following conditions occur; the workplace changes, making the earlier training obsolete, the type of PPE changes, or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding. All training will be documented through sign off sheets. All employees will be trained through daily safety contacts, Job Safety Analysis and Monthly toolbox meetings to know:
    1. When and why PPE is necessary.
    2. What PPE is necessary for all of the tasks that they perform.
    3. How to properly put on, adjust, wear, and remove their PPE.
    4. The limitations of the PPE.
    5. The proper care, maintenance, useful life and disposal of the PPE.

MINIMUM REQUIREMENTS:

HEAD PROTECTION

Hard Hats shall be worn at plants and jobsites where there is a potential for falling or flying objects, hair entanglement, burning or electrical hazards. Also, in all production areas of the plants, yards or pits, i.e., asphalt plants and crusher plant areas.

Hard hats shall not be altered in any way or be worn in a matter not intended or designed for by the manufacturer. Cracked, chipped, burnt or otherwise damaged hard hats shall be taken out of service immediately and replaced.

EYE PROTECTION

Safety glasses shall be worn where there is potential for flying objects or particles, chemicals, arcing, glare or dust. Some tasks may require additional protection such as goggles or face shields, which are worn along with, not in place of, safety glasses, i.e., grinding or cutting.

Safety glasses with permanently attached side shields must meet the ANSI Z.87 Industrial standard. The safety department will specify acceptable forms of eye protection. Sun glasses are not acceptable forms of safety glasses.

PROTECTIVE FOOTWEAR

Leather safety shoes shall be worn to protect from falling objects, chemicals or stepping on sharp objects. When working on a hot mat, steel-toed safety shoes are optional. Plant personnel, mechanics and others working with heavy equipment with potential of crushing injuries shall wear steel-toed safety shoes. Athletic or canvas type shoes shall not be worn at any time.

PROTECTIVE GLOVES
Proper hand protection shall be worn to protect against hazards associated with certain tasks.

HARNESSES AND LANYARDS
Proper equipment shall be worn for fall protection at heights of six feet and greater, as required by MIOSHA Construction and Industry Safety Standards. Refer to the Fall Protection Section.

REFLECTIVE SAFETY VESTS
Retro-reflective safety vests, Class II or higher shall be worn on all projects. Vests shall be fully closed as designed to provide 360 degrees of visibility. Vests are to be maintained as needed and replaced if necessary.

RESPIRATORY PROTECTION

GENERAL

Respiratory protection is used to control occupational disease caused by breathing air contaminated with harmful dusts, fogs, fumes, mist, gases, smokes, sprays or vapors. The primary objective shall be to prevent atmospheric contamination through acceptable engineering control measures such as enclosures, confinement of the operation, general and local ventilation or substitution of less toxic materials. Since this is not always possible, respirators may be needed for certain operations or until engineering controls can be instituted.

The Company will have an established written procedure to govern respirator selection, fitting, training, maintenance, cleaning, testing and supervision.

All details pertinent to the use of respirators will be within the written procedure and the Safety Department will provide any other assistance as required.

SUBJECT

Guidelines for Implementation
Respiratory Protection Program
Policy and Procedure

AREA OF RESPONSIBILITY

Attached is a respiratory protection policy and procedure manual. The Corporate Safety Director is responsible for guidance and orientation to supervisors.

LEVEL OF TRAINING REQUIRED

Training of person issuing and/or selecting respirator for site specific and/or fit of respirator to personnel is done by safety director. Included in training will be:

- ⇨ Basic Practices
- ⇨ Extent of Hazard
- ⇨ Recognition and Resolution of Hazard
- ⇨ Regulations
- ⇨ Fit and Use and Inspection of Respirator

Periodic retraining due to change in type or selection or new rules and regulations is necessary for supervisors.

SITE SPECIFIC

Each facility will be required to make site specific written procedures according to need and extent of respiratory hazards in a particular are or facility.

AVAILABLE RESOURCES

To help you in implementing this policy you may wish to contact your area MSHA or MIOSHA office for materials; this can include having a consultant from the respective agency come to your location and address your group. There are numerous videos available on this topic from

most professional associations as well as our own Safety Department. If you need further information on resources to utilize, please contact our Safety Department.

POTENTIAL LIABILITY

MIOSHA and MSHA can both issue citations for noncompliance. Under certain circumstances individuals can be held personally liable for their negligence in allowed uses or in not adhering to the specific respirator limitation.

FALL PROTECTION

GENERAL PROCEDURES

A thorough understanding of the fall hazards in your workplace is the first step in fall prevention. Once potential fall hazards are identified, steps to eliminate or control them will occur. Engineering methods, including guardrails or scaffolds, are to be used first. If engineering controls are not possible, personal fall protection will be used. Levels of six (6) feet or higher require fall protection.

One hundred percent (100%) fall protection will be provided for all employees who are working near the edge of a building, a platform, an open shaft, or any area that poses a possibility of falling six feet or more. Only equipment that meets ANSI standards shall be used.

Floor openings will be planked over or barricaded and slab edges of an open building will be protected by standard railing and toe boards. These protective barriers will be maintained and will not be disturbed or removed except as directed by a supervisor. If temporary removal is required, persons who remove these barriers will be responsible for their replacement as soon as circumstances permit.

In the event an employ falls or some other related, serious incident occurs, a prompt rescue will be deployed if the employee is unable to rescue themselves and an investigation shall be conducted to examine the circumstances of the incident to determine if the fall protection plan needs to be changed (e.g. new practices, procedures, or training) and shall implement those changes to prevent similar types of falls or incidents.

TRAINING

- ⇨ The Company will train all affected employees to recognize fall hazards and how to minimize these hazards, the use of personal fall protection including the limits of the equipment, the proper anchoring and tie-off techniques, methods of use, and the proper equipment inspection and storage.

- ⇨ Employees must be trained to visually inspect their equipment before each use and to have it inspected every 6 months by a "competent person." Employees are responsible for the care and maintenance of their personal fall protection equipment.

- ⇨ Documentation of this training must be kept on file. Training records must include the following: 1) Who was trained, when, dates of training, 2) Signature of person providing training and date management determined training was deemed adequate.

- ⇨ Retraining shall be provided when the following are noted: 1) Deficiencies in training. 2) Work place changes. 3) Fall protection systems or equipment changes that would render previous training obsolete.

DEFINITIONS

Personal Fall Protection: a system that is used to arrest a fall from an elevated level. Fall protection equipment must consist of a full body harness, a shock absorbing lanyard or a

retractable lanyard, and an anchorage point or lifeline.

Travel Limiting: a fall protection system consisting of a full body harness, an anchorage point, and a lanyard that prevents a person from approaching an exposure to a fall.

Work Positioning: a system consisting of a full body harness, lanyard, and anchorage devices rigged to allow a person to be supported on an elevated vertical surface, such as a wall, a pole, a fixed ladder, and have both hands free.

UTILIZATION OF FALL PROTECTION

- ⇨ All employees must use fall protection when working in an area where a hazard exists of a fall from a height, entrapment, or engulfment. Employees working at any elevation greater than 6 feet above the floor, deck, platform, or ground level, and not protected by standard hand rails, or equivalent shall be required to use personal fall protection.

- ⇨ Employees working in an aerial lift or on scaffolding not equipped with standard hand rails shall be required to use personal fall protection.

- ⇨ Fall protection equipment shall be adjusted to minimize the drop in case of a fall. Free fall distance must not exceed 6 feet.

- ⇨ Use caution while wearing a body harness and lanyard when you are not tied off. Wear the lanyard in such a manner that it will not get caught on or in equipment, structures, or moving machinery.

- ⇨ All adjusting straps of the body harness shall be kept snug against the body and shall not be allowed to hang free.

- ⇨ No part of the lanyard shall be allowed to dangle freely when not tied off. The lanyard shall be secured tightly against the user's body

- ⇨ The use of Safety Belts is strictly forbidden.

- ⇨ Employee shall use fall protection equipment supplied by the company. All fall protection equipment purchased and supplied to the employees will meet applicable ANSI, ASTM, and OSHA requirements.

- ⇨ Whenever possible, employees should work in teams while working at heights or have 2-way radios so that in the event of a fall, rapid rescue, if required, can be initiated.

ANCHORAGE POINTS

- ⇨ Anchorage points must be capable of supporting 5,000 pounds per employee attached. If there is any doubt about the strength of proposed anchorage point, do not tie off. Contact your supervisor and and/or find another tie-off point.

- ⇨ The anchorage point should be at or above the D-ring level on the body harness whenever

possible.

- ⇨ Anchorage locations should reduce possible free fall distance, prevent pendulum swing hazard, and provide clear space in the potential fall path to avoid striking an object below.

- ⇨ In considering the most desirable anchorage point for tie-off, avoid any sharp edge or object that the lanyard might contact while at the work location or in the event of a fall.

- ⇨ Lanyards must not be attached to shafts which may be subject to un expected rotation.

All employees shall wear a fall protection harness when working in an area where a hazard exists of a fall from a height, entrapment or engulfment. Employees working at an elevation greater than six feet above the floor, deck, platform or ground level, and not protected by standard top rails, mid rails, toe boards and/or equivalent protection shall be required to use fall protection. Employees working in an aerial lift or on scaffolding not equipped with standard railings shall be required to use personal fall protection.

Personal fall protection is a system that is used to arrest an employee in a fall from a working level. The fall protection must consist of a body harness, a deceleration device and an anchorage point or lifeline, with approved hooking devices.

Travel limiting is a system consisting of a body harness, lanyard, and anchorage device that prevents a person from an exposure to a fall. The length of the lanyard must prevent the person from reaching the free fall hazard.

Work positioning is a system consisting of a body harness, lanyard and anchorage devices rigged to allow a person to be supported on an elevated vertical surface, such as a wall or fixed ladder, and work with both hands free.
All fall protection equipment shall be visually inspected for damage and defects prior to each use. Employees are responsible for the care and maintenance of their personal fall protection.

Fall protection equipment shall be adjusted to minimize the drop in case of a fall. The potential free fall distances should never exceed 6 feet. The anchorage point for tie off should be at or above the D-ring level on the body harness whenever possible.

In considering the most desirable anchorage for tie off, any sharp object that the lanyard may contact while at the work location or during a possible fall must be avoided. Lanyards must never be tied off to shafts or other parts of machinery, which are subject to movement or rotation.

Anchorage points must be capable of supporting 5,000 pounds per employee attached. If there is any doubt about the strength of the anchorage point, do not tie off; notify your supervisor and find an alternative anchorage point.

Anchorage locations should; reduce possible free fall distance, prevent swing fall hazards, and provide clear space in the potential fall path to avoid striking an object.

Use caution while wearing a body harness and lanyard when you are not tied off. Wear the lanyard in such a manner that it will not get caught on or in equipment, structures or moving machinery.

- ⇨ All adjustment straps of the body harness shall be kept snug against the body.

- ⇨ No part of the lanyard shall be allowed to dangle freely when not tied off. The lanyard shall be secured tightly against the user's body.

LADDER SAFETY

1. Always inspect ladders before use. Also, a thorough inspection must be conducted monthly and results recorded on the proper inspection form. Defective ladders shall be tagged and immediately removed from service.

2. Only portable ladders of industrial quality and meeting ANSI and OSHA standards may be used. Always use a ladder with a load rating adequate to your task.

3. Portable metal ladders including aluminum shall not be used.

4. Never paint or use painted wooden ladders. Paint hides cracks, knots, rotting or other defects.

5. Use only company provided ladders. Never construct a temporary ladder or use a contractor's ladder.

6. Inspect the safety feet before using a straight ladder and be sure the safety feet are positioned on a firm level surface.

7. Straight, portable ladders, extension ladders or non-self-supporting portable ladders, shall extend at least three (3) feet above the top access level and be placed so the base of the ladder is one (1) foot away from the wall or other supporting structure for every four (4) feet of the ladder from the base to the top support point (4:1 Rule). Both rails of these ladders must be tied in place, or held by a co-worker whenever someone is working on the ladder.

8. Only one (1) person at a time should be on a ladder and only the tools specifically required for the task being performed should be taken to overhead work areas.

9. A second person does not need to hold a stepladder when the ladder is used with all four (4) legs on a level and even surface. The legs of stepladders must be fully opened and locked before stepping onto the rungs.

10. Never stand on or work from the top two (2) steps of a stepladder.

11. When climbing any ladder, always use three (3) points of contact, i.e. two hands and one foot or two feet and one hand in contact with the ladder at all times. Always face the ladder while ascending, working or descending.

12. Avoid carrying anything in your hands while climbing a ladder. Use a hand line to raise or lower tools and parts. Never exceed the maximum intended load limit of the ladder.

13. Never overreach. Keep your belt buckle between the side-rails to avoid overreaching. Move the ladder as your work progresses.

14. Never place a ladder against equipment that may move or rotate unexpectedly unless that equipment is locked out.

15. Never extend an extension ladder full length. The overlap should be at least four rungs.

16. When raising or lowering an extension ladder, use extreme care to keep your hands and fingers clear of pinch points.

17. Whenever practical, rope off the area at the base of the ladder to prevent contact by other personnel or mobile equipment.

18. Ladder must not be placed in front of doors opening towards the ladder unless the door is blocked open, locked or guarded.

19. Ladders shall not be placed on boxes, barrels or any other unstable base to obtain additional height.

20. Ladders must be used only for their intended purpose. They are not to be used as planking, ramps or a replacement where permanent stairs are required.

21. Ladders must be stored properly when not in use.

AERIAL LIFT

OBJECTIVES

1. All aerial lifts shall be designed and constructed in conformance with applicable requirements of the American National Standards for Vehicle Mounted Elevating and Rotating Work Platforms.

2. It is the policy of Ace-Saginaw Paving Co. to permit only trained and authorized personnel to operate aerial lifts.

3. To ensure that operators understand the limitations and safe operations of the equipment.

4. To ensure that all equipment is properly maintained and is kept good working order.

5. To ensure that equipment malfunctions are noted before accidents occur.

6. To ensure that non-qualified employees do not use this equipment.

7. To ensure that operators receive refresher training as necessary.

8. To ensure that qualified trainers are available to certify new operators and conduct refresher training.

9. Aerial lifts must maintain a distance of at least 20 feet from all live power lines.

COMPETENT PERSON

1. Each location using aerial lifts must select a competent person to oversee the aerial lift being used. The competent person also inspects all aerial lifts per the manufactures safety checks before each use. The competent person must have a complete grasp of functions, rules, and regulations as they pertain to the aerial lift he/she oversees.

2. Competent persons will manage the daily activities on and around aerial lifts and ensure the following:

    a. Fall Protection - Basket occupants must wear a body harness attached to the basket.

    b. Moving the Lift - The lift must not be moved when the boom is elevated in a working position unless the lift is specifically designed to do so.

    c. Lift Controls - Lift controls must be tested daily prior to operating the boom.

    d. Backup Alarms – Audible and visual alarms must be tested and in working order before each use.

    e. Boom and Basket Loads - The manufacturer's boom and basket maximum intended loads must not be exceeded.

    f. Outriggers and Brakes - Outriggers must be positioned on pads or solid ground when used. Brakes must be set anytime outriggers are used. Wheel chocks must be installed before the lift is used when working on an incline.

    g. Barricades & Signs - The area beneath operating aerial lifts must be cordoned off and access to that area must be restricted. Restricting access may be accomplished through the use of barricades and signs.

RESPONSIBILITIES

1. Site Supervisors
    a. The Supervisors on the job site are the competent person responsible for seeing that the Aerial Lift Safety Program is adhered to.

b. Responsible for developing and revising the written Aerial Lift Safety Program. In addition, the Safety Manager will be responsible for the training requirements and maintain documentation of training.

c. The Equipment Manager is responsible for auditing the entire Aerial Lift Safety Program and providing training assistance/materials to the department utilizing Aerial Lifts.

2. All Employees
   a. Employees are responsible for operating Aerial Lift equipment according to safe and proper techniques outlined in training classes. In addition, employees are responsible for notifying the Supervisor of any unsafe conditions related to the equipment.

3. Training
   a. Aerial lifts are considered any of the following:

      a. Vehicle-mounted aerial devices to elevate personnel to work areas not accessible from the ground.

      b. Extendible boom platforms, aerial ladders, articulating booms, vertical towers, and a combination of any such devices.

      c. Aerial lifts may only be modified for uses other than those intended by the manufacturer provided the manufacturer has certified the modification in writing.

      d. All employees who may on occasion work on aerial platform must be trained. Training covers the proper use, inspection of, and hazards associated with aerial lifts.

      e. When working on an elevated platform, several factors must be considered.

         a. Fall Protection - Basket occupants must wear a body harness attached to the basket. Also personnel will stand firmly on the floor of the lift and will not climb on the side rails or the edge of the basket.

         b. Moving the Lift - The lift must not be moved when the boom is elevated in a working position unless the lift is specifically designed to do so.

         c. Lift Controls - All controls must be tested daily prior to operating the boom.

         d. Boom and Basket Loads - The manufacturer's boom and basket maximum intended loads must not be exceeded.

e. Outriggers and Brakes - Outriggers must be positioned on pads or solid ground when used. Brakes must be set anytime outriggers are used. Wheel chocks must be installed before the lift is used when working on an incline.

f. Barricades & Signs - The area beneath operating aerial lifts must be cordoned off and access to that area must be restricted. Restricting access may be accomplished through the use of barricades and signs.

4. Roles and Responsibilities

A. Management

1) Provide appropriate type(s) of aerial lifts.

B. Supervisors

1) Ensure aerial lift(s) are being inspected at predetermined intervals.

2) Provide general training and competent person training.

3) Assist competent person in establishing aerial lift inspection guidelines.

4) Provide periodic audits of the aerial lift safety program.

C. Employee

1) Attend Aerial Lift Training.

2) Adhere to aerial lift safety requirement.

D. Documents Management

1) Supervisors are responsible for developing and maintaining the program. If after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of our written Aerial Lift Safety Program. We strive for clear understanding, safe behavior, and involvement from every level of the company.

E. Change Control

1) All management system changes are reviewed, approved or disapproved by the Safety Manager.

HEARING CONSERVATION

DEFINITIONS:

1. Action Level – An 8-hour time weighted average of 85 decibels.

2. Audiogram – A chart, graph, or table resulting from an audiometric test showing an individual's hearing threshold levels as a function of frequency.

3. Permissible Exposure Limit – An 8-hour time weighted average of 90 decibels.

4. Decibel(dB) – Unit of measurement of sound level.

5. TWA – Means time weighted average.

6. Standard Threshold Shift (STS) – An average shift (or loss) in either ear of 10 db or more at the 2,000-, 3,000-, or 4,000 Hz frequencies.

GENERAL PROGRAM REQUIREMENTS:

- ⇨ Whenever information indicates that any area in a facility and/or an employee is being exposed to noise at or above the action level (85 decibels), the following program is implemented.

MONITORING:

- ⇨ Noise exposure levels must be monitored in a manner that will accurately identify employees who are subjected to an 8-hour TWA exposure at or above the action level (85 dB). The exposure measurement must include all noise within an 80-130 dB (A) range.

- ⇨ Employees or union representatives are permitted to observe monitoring procedures and must be notified of the results. Posting a copy of the monitoring result on bulletin boards satisfies this requirement.

- ⇨ Monitoring shall be repeated whenever a change in a production process, equipment or controls increase noise levels to the extent that:
    1. Additional employees may be exposed at or above the action level.
    2. Attenuation provided by hearing protection being used may be inadequate.

- ⇨ MONITORING METHOD (S) – Due to high worker mobility, our company will utilize representative personal sampling to comply with our monitoring requirements. Baseline noise levels will be taken on any equipment or area where a potential for over exposure could exist. In certain instances where a permanent piece of equipment which is manned 8 hours a day, area sound level monitoring may be done. If a location is determined to potentially exceed the action level, an 8-hour test will be implemented with a calibrated dosimeter.

HEARING CONSERVATION PROGRAM:

- ⇨ A hearing conservation program that includes audiometric testing must be made available to all employees exposed to an 8-hour TWA exposure at or above the action level.

- ⇨ Two types are audiograms are required in the hearing conservation programs:
    1. Baseline
    2. Annual

- ⇨ Baseline audiograms must be provided within 6 months of an employee's first exposure at or above the action level. The annual audiogram must be conducted within one year of the baseline audiogram, and every year thereafter.

AUDIOGRAM EVALUATION:

- ⇨ Annual audiograms must be compared to baseline audiograms to determine whether the audiogram is accurate and whether the employee has experienced a Standard Threshold Shift (STS). Employees with an STS must be notified, in writing, within 21 days of the finding of their audiometric test. Some employees with STS may need to be referred for further testing if their test results are questionable or if they have a medical problem caused or aggravated by wearing hearing protectors.

- ⇨ If the suspected medical problem is not related to wearing protectors, employees will be referred to their private physician.

TRAINING:

- ⇨ Employees exposed at or above the action level must participate in annual training covering the following topics:
    1. Effects of noise on hearing.
    2. Purpose and procedures of audiometric testing.
    3. Purpose, advantages/disadvantages, and attenuation characteristics of various types of hearing protectors.
    4. Instructions on selection, fitting, use and care of hearing protectors.
    5. The purpose of audiometric testing, and an explanation of the test procedures.

RECORDKEEPING:

- ⇨ Noise exposure measurement records must be kept for two years. Records of audiometric test results must be maintained for the duration of the affected employee's employment.

- ⇨ Audiometric test records must include:
    1. Employee name.
    2. Job classification.
    3. Date test was performed.
    4. Examiner's name.
    5. Date of acoustic or exhaustive calibration of the audiometer.
    6. Measurements of background sound pressure levels in audiometric test booths.
    7. Employee's most recent noise exposure measurement.

DUTIES AND RESPONSIBILITIES:

- ⇨ Safety Department

1. Coordinate required noise level monitoring and resultant recordkeeping as specified in the OSHA/MSHA standard. The results of the monitoring will determine which employees are in the program.

2. Ensure that noise exposure measurements are maintained for at least two years.

3. Approve all hearing protectors.

4. Develop the monitoring program needed at each ASPC location with the respective Manager.

5. Arrange training program for each Levy location and provide assistance when needed.

6. Coordinate with the Human Resource Department and/or local management on how, when and where audiometric testing will be conducted.

- ⇨ Ace-Saginaw Paving Co. Management

1. Will coordinate with the Safety/Human Resource Department for the administration of the annual audiometric tests. This includes administering OSHA's requirement that the audiogram testing be preceded by a 14-hour quiet period. Since management has no control of employee's off-hour activity, this requirement should be made known to employees prior to their scheduled baseline and annual audiometric test date. At work, the quiet time requirement may be accomplished with the use of hearing protectors.

2. Conduct/coordinate annual hearing conservation training.

3. Maintain issuance records of hearing protectors.

4. Assure that "Caution – Hearing Protection Required" signs are posted in all areas where noise levels exceed the permissible exposure limit.

5. Maintain inventory of appropriate hearing protection devices and replacement parts.

   Note: At least two (2) different types of muffs and plugs must be made available at no cost to the affected employees.

6. Periodically audit their site to ensure compliance with this program.

7. Contact the Safety Department if unique problems, situations or questions arise.

⇨ Employees

1. Wear appropriate hearing protectors when required.
2. Wear appropriate hearing protectors properly.
3. Clean and inspect the hearing protectors as required.
4. Contact their Supervisor if the hearing protector is defective.

ELECTRICAL SAFETY AND LOCKOUT / TAGOUT

ELECTRICAL SAFETY

1. Only qualified and trained personnel are allowed to perform electrical maintenance or repair on energized parts.

2. Training required that meets MIOSHA requirements shall be of the classroom or on-the-job type. Employees shall be trained in and familiar with the safety related work practices that pertain to their respective job assignments. Qualified persons shall, at a minimum, be trained in and familiar with the following: 1) The skills and techniques necessary to distinguish exposed live parts from other parts of electrical equipment, 2) The skills and techniques necessary to determine the nominal voltage of exposed live parts, and 3) the clearance distances specified by MISHA standards and the corresponding voltages to which the qualified person will be exposed.

3. Training requirements apply to employees who face a risk of electrical shock that is not reduced to a safe level. The following list of employee occupations face such a risk and are required to be trained: Blue-Collar Supervisors, Electrical and Electronic Engineers, Assemblers, technicians, Electricians, Industrial Machine Operators, Material Handling Equipment Operators, Mechanics, Painters, Riggers and Welders.

4. Additional training for qualified employees shall include the minimum safe approach distances to energized parts as shown below:

Voltage Range (phase to phase)	Minimum Approach Distance
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in.
Over 750V, not over 2KV	1 ft. 6 in.
Over 2KV, not over 15KV	2 ft. 0 in.
Over 15KV, not over 37KV	3 ft. 0 in.
Over 37KV, not over 87.5KV	3 ft. 6 in.
Over 87.5KV, not over 121KV	4 ft. 0 in.
Over 121KV, not over 140KV	4 ft. 6 in.

5. Unqualified employee shall be trained in and familiar with safety related work practices required by MIOSHA that pertain to their respective job assignments. Additionally, training shall include any electrically related safety practices not specifically addressed in these standards but are necessary for their safety.

6. All portable electrical tools must be fully grounded or be double insulated for employee protection. In order to eliminate electrical hazards, portable electric tools when used in outside or in wet or damp locations must be used in a G.F.C.I. protected circuit.

7. Inspect all electrical extension cords and portable electric tools prior to use. Do not use any damaged equipment.

8. Follow all lockout / tagout procedures before performing any work on energized equipment.

9. Only authorized and qualified personnel are allowed to make electrical connections or repair electrical equipment and wiring. Before beginning work, always use a testing device to determine if lines or any part of equipment is energized. The proper PPE, including dielectric gloves and face shield, must be worn while making these tests. All jewelry and metallic belt buckles must be removed or fully covered when working on energized parts.

10. Before beginning work, make sure the testing device is rated for the voltage being tested, and that it is working properly.

11. Only qualified and authorized employees may work in areas containing unguarded, un-insulated energized lines or parts of equipment at 50 volts or more.

12. Only qualified and authorized employees may work on energized parts that must be worked on in an energized state, or do not have the capability of being locked out.

13. Safety related work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts or by means of tools or other material when work is performed on or near enough to energized equipment or circuits for employees to be exposed to any hazard they present.

14. The specific safety related work practices shall be consistent with the nature and extent of the associated electrical hazards.

15. Considered all electrical parts energized until it is positively known that they are "dead". Conductors and parts of electric equipment that have been de-energized but have not been locked out shall be treated as energized parts. Do not touch any exposed or dangling wires. Report exposed wires and open electrical components to supervision.

16. While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been de-energized, the circuits energizing the parts shall be locked out in accordance with the Edw. C. Levy / Ace-Saginaw Paving Co. Lockout / Tagout Policy.

17. Do not use extension cords that are defective. Examine them carefully for worn insulation and exposed strands of wire before use. Connect extension cords to G.F.C.I. outlets or adaptors. Do not place extension cords over sharp edges or across aisles where mobile equipment can damage them. Do not create a tripping hazard with extension cords.

18. Extension cords are for temporary use only, and may not be used as a substitute for fixed wiring, run through holes in walls, ceilings, doors, windows or floors. Also, do not suspend extension cords from metal parts such as pipes, heaters, etc.

19. Do not overload electric circuits. If fuses blow continually, or if circuit breakers kick out, report the condition to your supervisor for proper repairs.

20. Heed all warning signs and signals concerning the hazards of electrical equipment or lines.

21. Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines shall be operated so that a clearance of at least 10 feet is maintained. For voltages over 50kV, the clearance shall be increased 6 inches for every 10kV over that voltage. The clearance may be reduced under the following conditions:

    A. If insulating barriers are installed.

    B. If the equipment is an aerial lift insulated for the voltage involved, and if the work is performed by a qualified person, the clearance may be reduced to the distances identified for them.

22. When qualified employees are working in the vicinity of overhead lines, they may not approach or take any conductive object closer to exposed energized parts than 10 feet for voltages to ground 50kV or below. For voltages above 50kV, add 6 inches for every additional 10kV.

23. If work is to be performed by qualified employees in the vicinity of overhead lines, the lines shall be de-energized and grounded. Or other protective measures such as guarding, isolating or insulating shall be provided before work is started. These

precautions shall prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools or equipment. Qualified employees may not approach or take any conductive object without an approved insulating handle closer to exposed energized parts shown in the above table.

24. Unauthorized personnel are not permitted to enter rooms or vaults, such as supply stations, substations, motor rooms, control rooms or any room containing high voltage equipment unless instructed to do so by a supervisor and accompanied by a trained and authorized individual, or if control measures have been taken to eliminate all possibility of contact with energized electrical components.

25. Employees may not enter spaces containing exposed energized parts, unless illumination is provided that enables the employee to perform the work safely.

26. Employees may not reach blindly into areas which contain energized parts.

27. When an employee works in an enclosed or confined space that contains exposed energized parts, the employee shall use protective shields, protective barriers or insulating materials as necessary to avoid inadvertent contact with these parts.

28. If an employee must handle long dimensional conductive objects in areas with exposed live parts, work practices (such as the use of insulation, guarding and utilizing two people to handle and control both ends of the material) shall be instituted to minimize the hazard.

29. Portable ladders shall have non-conductive side rails if they are used where employees or the ladder could contact exposed energized parts.

30. Conductive articles of jewelry and clothing (such as watch bands, bracelets, rings, key chains, necklaces, body piercings, cloth with conductive thread or metal head gear) may not be worn if they might contact exposed energized parts. Such articles may be worn if they are rendered non-conductive by covering, wrapping or other insulating means.

LOCKOUT/TAGOUT

No employee is allowed to adjust, service, repair or perform maintenance on machines or equipment without first bringing the source, or sources, of energy to a zero energy state, relieving any potential energy then locking out the source of energy to prevent accidental startup.

Review the procedure for lockout and shutdown specific to that piece of equipment before performing the work.

Only employees trained and authorized may perform the lockout procedure.

Every employee involved in work on a machine or piece of equipment must be part of the lockout procedure and must use his own lock.

The company will supply locks and tags that will be used exclusively for equipment lockout.

Only the employee that installed the lock is allowed to remove it. If it needs to be removed, and that employee cannot be found, attempt to locate the employee that left the lock in place.

CONFINED SPACES ENTRY

SCOPE AND APPLICATION

The Occupational Safety and Health Administration (OSHA) enacted 29 CFR 1910.146 - Permit-Required Confined Spaces on April 15, 1993. Even though this standard only addresses companies covered under General Industry, all Edw. C. Levy companies and job sites will comply with this written program.

Within the Edw. C. Levy group of companies the following examples meet the definition of a confined space:

- ⇨ Bins.
- ⇨ Hoppers.
- ⇨ Enclosed discharge chutes.
- ⇨ Tunnels.
- ⇨ Any enclosed space where there is a danger of engulfment.
- ⇨ Any enclosed space where manufacturing or repair procedures can change the atmosphere.

There are other types of confined spaces at locations throughout the corporation that will be determined during site specific surveys.

Under OSHA confined space policies, the company has to document that no hazard exists, without documentation it is presumed to be a Permit Required Confined Space.

The standard requires the company to perform the following functions:

- ⇨ Evaluate each workplace to determine if there are any permit-required confined spaces or if there are any confined spaces which don't require a permit for entry. All permit required spaces will be identified with a sign stating:

"DANGER - PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER"

- ⇨ Non-permit confined spaces do not require a sign to be posted at its entrances unless something is done inside the space which would change its classification to a permit space. However, the company recognizes that a potential danger exists with any confined space and would recommend that signage be posted at the entrances to these spaces also in order to warn employees.

This signage should read:

"DANGER - CONFINED SPACE, DO NOT ENTER WITHOUT MANAGEMENT APPROVAL".

- ⇨ If a company decides that a permit-required confined space will not be entered by any employee, effective measures must be taken to prevent employees from entering the permit space. Signs shall be posted at these locations and all employees shall be made aware of these areas.

- ⇨ A permit space whose only hazard is an actual or potentially hazardous atmosphere, may only be entered after the company demonstrates that the permit space is safe by the use of continuous forced air ventilation and verifies this by testing with an approved monitor. Continuous monitoring will be in effect within the space for employee safety.

- ⇨ When there are changes in the use or configuration of a non-permit confined space which may increase the hazards to any employee entering the space, the company will reevaluate the space to determine if the space shall be reclassified as a permit-required confined space.

- ⇨ The company will supply all contractors working in company owned or controlled permit-required confined spaces with all information required and available under this standard to safely work in the permit spaces.

DEFINITION OF TERMS

1. Acceptable entry conditions - Means the conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit-required confined space entry can safely enter into and work within the space.
2. Attendant - A trained employee who is stationed outside the confined space and acts as an observer of the authorized entrants within the confined space maintaining continuous communication with them so the attendant can immediately call for rescue services if needed.
3. Atmosphere - All air within a confined space and the air immediately outside a confined space.
4. Authorized Entrant - A trained employee who is authorized by the employer's person-in-charge-of-Entry to enter a confined space.
5. Ceiling Limit - The maximum level of a substance to which an employee may be exposed.
6. Confined Space - A space which by design has limited openings for entry or exit; has inadequate natural ventilation; is not intended for continuous employee occupancy. (See Appendix "A" for evaluation form.)
7. Combustible- Any liquid having a flash point at or above 100 F (37.8 C)
8. Engulfment - The surrounding and entrapment of person by a liquid or a finely divided (flowable) solid substance that can be aspirated 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.
9. Entry - Any action resulting in an employee's body breaking the plane of any opening of a permit required confined space and including any further presence inside the confined space.
10. Entry Permit - The written or printed document that is provided by the company to allow and control entry into a permit space.(See Appendix "B".)
11. External Barrier - Any equipment (horse, ropes, pennants, etc.) arranged to protect employees entering, occupying, or exiting from a confined space from hazards immediately adjacent to that space, e.g. mobile equipment traffic.
12. Hazardous Atmosphere - An atmosphere presenting a potential for injury, acute illness, or death from one or more of the following causes:

a) Atmospheric oxygen concentration below 19.5% or above 23.5%
b) Flammable gas, vapor or mist in excess of 10% of its lower flammable limit (LFL).
c) A concentration of any toxic or corrosive substance above the Permissible Exposure Limit (PEL) Short Term Exposure Limit (STEL), or Ceiling Level.
d) A concentration of airborne combustible dust that meets or exceeds its Lower Flammable Limits (LFL); may be approximated as a condition that the dust obscures vision at a distance of five (5) feet or less.
e) Extreme levels of noise, vibration, or temperature.
f) Any other condition that is immediately Dangerous to Life or Health (IDLH).

13. Hot Work Permit - Any activity capable of producing a source of ignition, such as; burning, welding, riveting, drilling, grinding, or abrasive blasting, for which written authorization by the company is required prior to performing in a confined space.
14. Immediately Dangerous to Life or Health (IDLH) - Any condition that causes an immediate threat to life, which is likely to result in severe health effects, or which interfere with an individual's ability to escape unaided from a permit space.
15. Isolation - Positively preventing any unwanted agent (energy/material etc.)from entering a confined space.
16. LockOut/Tagout - Positively reducing the energy state of any energy source within or integral to the confined space to zero energy state and preventing the re-energization as detailed in the Control of Hazardous Energy Program (LockOut/Tagout).
17. Lower Explosive Limit (LEL) - The minimum concentration of a combustible gas or vapor in an atmosphere which will ignite if an ignition source is present. This may also be referred to as the Lower Flammable Limit (LFL).
18. Oxygen Deficient Atmosphere - An atmosphere containing less than 19.5% oxygen by volume.
19. Oxygen Enriched Atmosphere - An atmosphere containing more than 23.5% oxygen by volume.
20. Permit-Required Confined Space- A confined space that has one or more of the following characteristics:
    a) Contains or has potential to contain a hazardous atmosphere
    b) Contains a material that has the potential for engulfing an entrant
    c) Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or
    d) Contains any other recognized serious safety or health hazard.
21. Permissible Exposure Limit (PEL) - An exposure limit that is published and enforced by OSHA as a legal standard. The 8-hour time weighted average of a substance to which an employee may be exposed to without experiencing adverse effects.
22. Person-in-Charge-of-Entry - An individual empowered by the employer (normally the supervisor) to authorize entry into confined spaces upon making necessary determinations that acceptable entry conditions are present, the entry permit is prepared correctly, and entry authorization is terminated if acceptable entry conditions are not met.
23. Purging - Making the atmosphere of a confined space non-flammable, non-explosive, or chemically non-reactive by displacing or deleting the original atmosphere with steam or a gas that is non-reactive.

24. Qualified Test Person - A person designated and certified by the employer who is trained in and capable of recognizing and evaluating employee exposure to hazardous substances or other unsafe conditions in a confined space; capable of specifying control and/or protective action to ensure employee safety; and having knowledge and training in the use and limitations of applicable testing equipment as specified by the manufacturer.
25. Retrieval System - A line or rope secured at one end to an employee in a confined space, and the other and secured to a lifting or retrieval device, or to an anchor point located outside of the confined space entry portal to prevent falling and to provide safe rescue if needed.
26. Short Term Exposure Limit (STEL) - The maximum amount of a substance to which employees may be exposed to over a fifteen (15) minute period without experiencing adverse effects.
27. Toxic Chemicals - Those gases, liquids, or solids which through their chemical properties can produce injurious or lethal effect upon contact with body cells.

IDENTIFICATION OF PERMIT REQUIRED CONFINED SPACES

The plant manager or designated representative is responsible for evaluating the workplace and locating any confined space. These confined spaces can be divided into two types, permit-required confined spaces and non-permit confined spaces. (see appendix "A"). Each of these spaces will require that the company locate and label them to provide employee protection.

A permit-required confined space or permit space has the following characteristics:

* the space is large enough for a person to enter and perform assigned work, and
* has limited entrances and exits, and
* is not designed for continuous worker occupancy, and
* has one or more of the following hazards:
  - contains or has a potential to contain a hazardous atmosphere, or
  - contains a material that has the potential for engulfing an entrant, or
  - has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section, or
  - contains any other recognized serious safety or health hazard

⇨ Examples of permit required confined spaces at Levy Company locations would be: bins, hoppers, enclosed discharge chutes, tanks, trenches, silos, pits, sewers, tanker trailers, tunnels, wells, and manholes.

MEASURES TO PREVENT UNAUTHORIZED ENTRY

The company is required to prevent any unauthorized entry into a confined space, be it a permit space or non-permit space. An entry takes place when a person breaks the plane of any opening to the space with any part of the body. This can be done with as little as a person placing a hand inside the confined space or by a person just barely putting his or her face into the confined space to look around.

An unauthorized entry takes place whenever the confined space is entered before the entry supervisor has deemed the space safe for entry and by anyone not authorized and trained for entry into a confined space.
The plant manager or designated representative is responsible for preventing unauthorized entry into any confined space at the workplace or at work sites under his or her control.

This can be accomplished by some of the following means:

* identify and label all confined spaces
* educate and train all employees in the meaning and dangers of confined spaces and the method used in labeling them at the site
* educate and train employees that no confined space may be entered without authorization from the entry supervisor
* educate employees on the dangers of confined space rescue and why only trained personnel will be allowed to perform any rescue operation
* specifying acceptable entry conditions for that particular space
* isolating the confined space to limit or eliminate any outside hazard such as pedestrian and vehicular traffic
* prevent actual entry by means of locks, barriers, barricades, fencing and other like devices

A trained attendant shall be stationed outside the permit space whenever anyone is inside a permit-required confined space. The attendant must be in constant communication with each person within the permit space.

A permit space may only be entered after the conditions have been controlled and the entry supervisor has evaluated the space and is satisfied that it is safe. The entry supervisor must fill out an entry permit certifying that all conditions for safe entry are acceptable for the duration of time listed on the permit. If all conditions for safe entry are not met, no one is allowed to enter the confined space.

A non-permit space must be evaluated by an entry supervisor to ensure employee safety. The entry supervisor must assess the conditions in and around the non-permit space prior to anyone entering the space to be sure of acceptable conditions within the space when it is entered. The tasks to be performed within the space cannot change the atmosphere to one that is more hazardous or the space may need to be reclassified as a permit space.

PRE-ENTRY IDENTIFICATION AND EVALUATION OF HAZARDS

The entry supervisor is designated as the person to evaluate each permit-required confined space prior to entry. He or she must ensure that conditions are acceptable and safe for anyone entering the space for the duration of time needed to perform the task. One tool used for this purpose is the entry permit (example found in Appendix "B").

The entry permit must be completely filled out prior to entry into the permit space. The entry supervisor must be assured that the information required on the permit is correct and the conditions listed are factual.

Another tool used by an entry supervisor is information on the use and history of the permit space. Background information may be obtained about actual and potential hazards of the space in this way.

A visual inspection around the outside of the confined space may provide clues of obvious safety and health hazards, such as electrical hazards, exhaust problems, traffic problems, pipelines and other similar potential problems.

The entry supervisor should also be familiar with all safety data sheets (SDS) for materials or chemicals that are in or around the permit space. A material safety data sheet for any material to be taken into the permit space must also be researched by the entry supervisor in an effort to detect potential problems. Frequently, there is no problem with hazards in a confined space at the start of an entry. The problem starts when the
work begins and a chemical reaction occurs which creates a hazard or the work itself changes the environment to one that is hazardous.

Where hazards include actual or potential atmospheric hazards, monitoring shall be conducted prior to entry and as necessary to determine if accecptable entry conditions are being maintained during the course of entry operations. This monitoring is to be performed with a calibrated, direct-reading instrument for the following conditions and in the order given:

- ⇨ oxygen content
- ⇨ flammable gases, vapors or mists
- ⇨ potential toxic air contaminants (especially carbon monoxide)

A hazardous atmosphere may include any of the following:

- ⇨ atmospheric oxygen concentration below 19.5 percent or above 23.5 percent
- ⇨ flammable gas, vapor or mist in excess of 10 percent of its lower flammable limit (LFL)
- ⇨ airborne combustible dust at a concentration that meets or exceeds its lower flammable limit (LFL)
- ⇨ atmospheric concentration of any substance for which a dose or a permissible exposure limit (PEL) is published in Subpart C, "Occupational Health and Environmental Control" or in Subpart Z, "Toxic and Hazardous Substances" which could result in employee exposure in excess of its dose or permissible exposure limit
- ⇨ any other atmospheric condition that is immediately dangerous to life or health (IDLH)

Any confined space meeting these conditions will be considered a permit-required confined space and must be identified as such. Any entrances to a permit space must be labeled with a danger sign to warn employees and others from accidental entry.

A non-permit confined space has the following characteristics:

- ⇨ is large enough for a person to enter and perform assigned work
- ⇨ and has limited entrances and exits
- ⇨ and is not designed for continuous worker occupancy
- ⇨ and does not contain nor have the potential to contain (with respect to atmospheric hazards) any hazard capable of causing death or serious physical harm

The non-permit confined space must also be identified and labeled with a danger sign at any entrance to the space to provide employee protection. Even though these spaces are not as dangerous as a permit space, a non-permit confined space must be evaluated before entry and can be reclassified as a permit space depending on the activities that will take place within the space by the workers. Activities surrounding or near a confined space may also change a non-permit space to a permit space depending on the hazards involved.

ENTRY PERMIT

Prior to entry, the entry supervisor shall sign the permit authorization entry. The completed permit will be available to all entrants so all entrants can confirm that the pre-entry preparations have been completed. The duration of the permit may not exceed the time required to complete the task. When the task is completed or if a condition that is not allowed under the entry permit arises in or near the permit space, the entry supervisor shall terminate and cancel the permit. Upon closing out an entry permit, steps shall be taken to close off the entrance to the confined space to prevent unauthorized entry.

Cancelled permits shall be retained for at least 1 year to facilitate a review of the confined space program. Reviews shall be conducted within 1 year after each entry. If a review of entry operations show that the measures taken under the permit space program may not protect employees, the program must be revised and deficiencies corrected before subsequent entries are authorized. Deficiencies can include but are not limited to; any unauthorized entry, a hazard not covered by the permit, injuries or near hits, and employee complaints.

The entry permit shall identify:

- ⇨ the permit space to be entered
- ⇨ the purpose of the entry
- ⇨ the date and the authorized duration of the entry
- ⇨ the name of the entrants, attendants and the entry supervisors
- ⇨ the hazards of the permit space to be entered
- ⇨ the measures used to isolate the permit space and to eliminate or control permit space hazards before entry.
- ⇨ the acceptable entry conditions
- ⇨ the results of initial and periodic tests performed including the names of the testers and the time when the tests were performed. Entrants shall be provided the opportunity to observe any monitoring or testing of permit spaces.
- ⇨ the rescue and emergency services to call in an emergency.
- ⇨ the communication procedures used to maintain contact during the entry.
- ⇨ equipment such as personal protective equipment, testing equipment, communications equipment, alarm systems and rescue equipment.
- ⇨ any other information or additional permits to ensure employee safety.

TRAINING

The company shall provide training so that all employees have the knowledge and skills necessary for the safe performance of their assigned task (See following sections for specific training for attendant, entrants, supervisors).

- ⇨ Training shall be provided before the employee is assigned the task or if there is a change in the assigned task.
- ⇨ If there is a change that presents a hazard for which an employee has not been previously been trained, or if there are inadequacies in the employee's knowledge of the procedures.
- ⇨ The company must certify that training has been completed and the employee is proficient in their duties. The certification shall contain the employee's name, trainers signature and the date of training. Certification must be made available to employees and to their authorized representatives.
- ⇨ Only employees who have received training and are certified by the company shall perform the respective duties of; Entry Supervisor, Attendant, Entrant.

AUTHORIZED ENTRANTS

The employer shall ensure all entrants know the hazards during entry including the signs, symptoms or consequences of the exposure. Entrants shall know how to properly use equipment and alert the attendant of the need to evacuate.

The entrant must be trained on the specific confined space he/she will be entering. They must also be given instructions on the proper fitting and wearing of all personal protective equipment that will be utilized. Authorized entrants must also have available and the know proper use of; ventilating equipment, communication equipment, lighting equipment, rescue equipment, barriers and shields, and any other equipment deemed necessary, such as ladders needed for entry and egress. This equipment must be provided at no cost to the employee. Training must include how to inspect the equipment prior to use, how the monitoring equipment testing is done, and self-rescue techniques.

It is necessary to alert the attendant whenever:

- ⇨ the entrant recognizes any warning sign as a symptom of exposure to a dangerous situation or the entrant detects a prohibited condition.

The entrant must exit from the space as quickly as possible whenever:

- ⇨ an order to evacuate is given by the entry supervisor.
- ⇨ the entrant recognizes any warning sign or symptom of exposure to a dangerous situation or if an evacuation alarm is activated.
- ⇨ If it can be demonstrated that the only hazard posed by the permit space is an actual or potential hazardous atmosphere and it can be demonstrated that continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry, the space can be reclassified as a non-permit required space. Periodic air monitoring (continuous monitoring preferred) must be conducted while continuous ventilation is being used. All Entrants must be given the opportunity to participate in and review calibrated air monitoring data prior to entry.
- ⇨ If a Entrant has reason to believe that changes have occurred that may impact their safety, or if they request additional monitoring, entry operations must be suspended until re-evaluation and monitoring has been completed.

ATTENDANT DUTIES

At least one attendant will be provided outside the permit required space into which entry is authorized for the duration of entry operations.

The attendant duties are as follows:

- ⇨ Each attendant will know the hazards that may be faced during entry and need to be aware of possible behavioral effects of a hazardous exposure.
- ⇨ Continuously maintain a count of entrants and remain outside the permit space, until the entrant has exited or until another attendant relieves them.
- ⇨ Monitor activities inside and outside the space and order the evacuation of entrants if there is a prohibited condition, a dangerous situation or the attendant detects the behavioral effects of a hazardous exposure.
- ⇨ Knowledge of when and how to summon rescue and other emergency services if needed.
- ⇨ Attendant may perform non-entry rescue only in the event of an emergency
- ⇨ Take action to prevent unauthorized persons from approaching or entering a permit space.
- ⇨ Attendants will be prohibited from monitoring more than one confined space at a time

ENTRY SUPERVISOR DUTIES

The entry supervisor duties are as follows:

- ⇨ must know the hazards that may be faced during an entry and the consequences of the exposure.
- ⇨ verifies that the appropriate entries have been made on the permit, all tests have been conducted and all procedures are in place before endorsing the permit
- ⇨ verifies that the rescue services are available and remove unauthorized individuals who enter or attempt to enter the permit space.
- ⇨ If work is being done by more than one employeer in the same confined space, the representative Entry Supervisors must coordinate activities so that employees of one company do not endanger the employees of any other company.

The Supervisor must be knowledgeable in all aspects/duties of both the attendant and the entrant.

RESCUE AND EMERGENCY PROCEDURES

If an emergency occurs during a permit-required confined space, only trained rescue personnel shall be used. Employees are not to enter a confined space in a rescue situation under any circumstance without proper rescue training and proper rescue equipment.

If the corporation is going to train its own employees to be a on-site rescue squad, arrangements must be made with the Corporate Safety Manager and an additional training agenda will be issued and included with this program, and would replace this section.

EMERGENCY PROCEDURES

In case of any emergency on site, the following procedures should be instituted at each site:

1. Method of communication should be determined at each site, telephone, radio, etc.

2. Emergency telephone numbers should be posted.

   - ⇨ Fire 911
   - ⇨ Police 911
   - ⇨ Medical 911

3. Post the address of your site near the communication station.

4. Post names of First Aid Responders on site.

5. Designate person to direct emergency crews to site of emergency.

In case of a Fatality or Catastrophe, management will notify MIOSHA within six hours. The law requires eight hours.

A Catastrophe is considered three or more persons hospitalized.

Management will be responsible for any and all notification to the family or media.

WELDING, BURNING & CUTTING

GENERAL REQUIREMENTS

Only trained and authorized personnel are permitted to use gas cutting or electric welding equipment.

Warn employees in the area before starting. Check above, below and around you.

Appropriate welders' hoods, goggles, and/or face shields must be worn for protection from flashes or sparks. An approved flame retardant jacket, burning/welding gloves, ear protection and flame retardant clothing must be worn when burning or welding.

Work must be shielded when welding or burning to protect others from the arc, flash or ultra-violet rays.

Provide adequate ventilation and avoid inhalation of metallic fumes or acetylene. Local exhaust ventilation is required when burning or welding in enclosed buildings.

Always check burning equipment for leaks before use.

Make periodic soap tests for leaks on all connections.

Repair of cutting and welding equipment must be done only by authorized personnel.

When torches are not in use, all pressure shall be bled from the lines and regulator by closing the tank valve first, then opening the torch valve and finally opening the regulator valve.

Maximum acetylene pressure through the gauge is 15 psi.

Keep hoses coiled and off the ground to avoid damage, contamination and tripping hazards.

Hoses which are damaged, shall be cut in two and taken out of service to prevent injury. Branching or using T-fittings in oxygen or fuel gas hoses is prohibited.

Hot Work Permit – Specific areas will be designated for hot work such as burning, welding and grinding. If an area is not designated for hot work, a hot work permit must be filled out before hot work can begin. The permit may require the use of a fire blanket, other means of containment, removal of fire hazards, air quality tests, fire watch, etc. to protect other employees and surrounding property.

Supervision will designate an individual responsible for authorizing burning, welding, grinding and other hot work operations in areas not specifically approved for such operations. The work area must be inspected, and the hot work permit signed before work can begin.

If it is necessary for you to in an area where welding or cutting is being done, exercise caution. Never look directly at the intense light generated by welding or cutting. Check your clothing to

be sure you are not carrying sparks, which might set your clothing afire. Grease and/or oil on your clothes are especially dangerous if you are working around oxygen. Oxygen can cause the grease or oil to ignite.

Cylinders Containing Compressed – Oxygen, acetylene and other compressed gases must be considered dangerous fire hazards because they support or increase the rate of combustion. When handling cylinders containing any kind of compressed gas, observe the following rules and specific instructions of your supervisor. If clothes are contaminated with grease, oil or solvents, they must be changed before performing any burning or welding.

TRANSPORTING CYLINDERS

- ⇨ Suitable carts shall be provided and used for conveying cylinders.

- ⇨ Caps shall be in place on compressed gas cylinders unless they are in use. Always replace the caps on full or empty cylinders after regulators have been removed. It is especially important to have the caps in place while transporting cylinders to protect the valve.

- ⇨ Compressed gas cylinders must be transported in special containers or carriers provided for that purpose. At a minimum the carriers shall have toe guards and a retainer system to secure the cylinder from falling during transport. Do not handle cylinders with crane slings or magnets. Use good judgment when handling or moving cylinders and do not lift beyond your capabilities.

- ⇨ Compressed gas cylinders must always be securely tied off in a vertical postion.

STORAGE

- ⇨ Compressed gas cylinders shall be stored with regulators removed and the cylinder caps installed and tightened.

- ⇨ Compressed gas cylinders shall not be stored near any source of heat or any area where unexpected contact with electrical equipment or conductors if they should slip, roll or fall. Do not store cylinders in entrance or exit areas, or in stairwells.

- ⇨ Oxygen cylinders must not be stored in a confined or enclosed space with acetylene, liquid flammable, oils or grease. A leaking cylinder can cause spontaneous combustion of these materials.

- ⇨ Acetylene cylinders must always be stored vertically and used vertically with the valve end up.

- ⇨ Oxygen shall be separated from fuel-gas cylinders or combustible materials at a minimum of 20 feet or by a non-combustible barrier at least 5 feet high having a ½ hour fire resistance rating.

- ⇨ Storage areas shall have signs posted stating "NO SMOKING", "AUTHORIZED USE ONLY" and "OXYGEN" or "ACETYLENE" to identify each area.

USING CYLINDERS

- ⇨ Never use oil or grease to lubricate any part of an oxygen, acetylene or other gas cylinder or regulator. Do not touch them if you have oil or grease on your hands or gloves.

- ⇨ If a leaking cylinder is found, remove it to the outside immediately and keep it away from any flames or combustible materials. Notify your supervisor.

- ⇨ Hoses for Acetylene-Oxygen Rigs – GREEN hose is for oxygen; RED hose is for all fuel-gas. Never use compressed air to blow out the hoses. To prevent tripping hazards and hose damage, keep excess hose lengths coiled and lines arranged in orderly fashion.

- ⇨ Never bring cylinders into or store cylinders in confined spaces, unventilated rooms or other closed quarters. Storage areas must be open or ventilated to prevent a build up of gas.

- ⇨ All torches must have either flashback arrestors built into the torch or units connected between the hoses and the torch.

FIRE PREVENTION AND FIRE FIGHTING

FIRE PROTECTION

- ⇨ Follow fire prevention rules for your work area and always be alert to potential fire hazards. Know the proper way of responding to a fire and know the emergency escape routes and designated assembly points should evacuation become necessary.

- ⇨ All mobile equipment shall have an approved fire extinguisher mounted on the vehicle.

- ⇨ All fire extinguishers shall be placed in an accessible location and proper signage will be displayed marking its location.

- ⇨ Articles shall not be placed on, or in front of fire fighting equipment or in a position that will obstruct its accessibility or hinder its use.

- ⇨ Never use water on or near electrical equipment.

- ⇨ Fire department phone numbers shall be conspicuously posted at all telephones.

- ⇨ Obey smoking regulations. Smoking is permitted in approved smoking areas only. Smoking is not permitted within 50 feet of any flammable liquid or gas storage area.

- ⇨ Do not allow rubbish or flammable materials to accumulate. Oily waste, rags, gloves, etc., shall always be placed in receptacles provided.

- ⇨ Never pour any flammable liquids down drains or sewers. Flammable liquids are to be kept in self-closing, properly labeled containers. Never use flammable liquids around open flames.

- ⇨ Change your clothes immediately if they become soaked with oil, gasoline, kerosene, naphtha, or other flammable or combustible materials. Stay away from heaters, salamanders, welding sparks, hot metal, and any other source of fire or extreme heat if your clothing has been contaminated with flammable or combustible liquids.

- ⇨ Do not light oil or gas furnaces, stoves, salamanders, or any other type of heating equipment unless you have been properly trained and are authorized to do so. Never deviate from written instructions when lighting such equipment.

- ⇨ Flammable liquids (flash point under 100 degrees F) may be used only where there are no open flames or other sources of ignition within any possible path of an escaping vapor. Do not dispense a flammable liquid into another container unless the nozzle and container are properly grounded. Flammable liquids shall be dispensed from approved safety cans only.

- ⇨ Flammable liquids must be stored in a building, cabinet, or area specifically designed and approved for such storage. The storage area must be properly identified and have a fire extinguisher readily available.

- ⇨ If there are flammable liquids in containers, or pipe lines supplying flammable gas in the area where a fire breaks out, make every effort within the bounds of safety to remove the containers or shut off valves controlling the gas to keep the fire from spreading or causing an explosion.

FIREFIGHTING EQUIPMENT

- ⇨ Firefighting equipment must not be used for any purpose except for extinguishing fires. Do not obstruct aisles or block the paths to fire hydrants, extinguishers, or to any other fire fighting equipment.

- ⇨ If a fire extinguisher is used, do not return it to a hanger or place it back in a cabinet. Contact shop for refilling or replacement.

- ⇨ Portable fire extinguishers are subjected to monthly visual inspections and an annual maintenance check.

- ⇨ Automatic sprinkler systems. If you are in an area protected by a sprinkler system, do not tamper with the equipment. Do not allow material to be piled close to the sprinkler valves or heads.

TRAINING

- ⇨ Training shall be provided to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.

- ⇨ Training shall be provided upon initial employment and at least annually thereafter.

- ⇨ Training shall include use of appropriate equipment based on class of fire as shown below.

    - CLASS A: Ordinary combustibles such as paper, wood, and/or cloth. Water is the recommended extinguishing agent, however, an extinguisher rated A-B-C can be used with reasonable success.

    - CLASS B: Flammable liquids such as grease, gasoline, oil, etc. This type of fire requires the use of a blanketing or smothering type of extinguishing agent. Use a dry chemical extinguisher rated A-B-C, carbon dioxide, or water fog (experienced fire fighters only). Never use high pressure or straight stream water to attempt to fight a flammable liquid fire

    - CLASS C: Electrical equipment. Use non-conductive extinguishers such as A-B-C dry chemical or carbon dioxide. Use of water or foam on an electrical fire can cause electrocution.

- CLASS D: Combustible metals such as magnesium, titanium. Use only extinguishers rated D. Water causes a violent reaction.

⇨ Training shall also include the three components of the fire triangle; oxygen, source of ignition, and fuel, and the effect of fire fighting equipment in removing one of these components.

⇨ Training in the use of portable fire extinguishers will also include the P.A.S.S technique.
- P…Pull the safety pin
- A…Aim at the base of the fire
- S…Squeeze the handle
- S…Sweep the nozzle back and forth across the base of the fire

⇨ Also included in training will be instruction on how to contact the fire department, by use of a fire alarm pull box, and/or telephone.

IN CASE OF FIRE

⇨ Only do what you can do safely to extinguish or contain the fire. Call the fire department immediately, notify your supervisor, and alert other personnel in the area of the situation.

⇨ When reporting the fire by telephone, be sure to give the exact location, speak clearly, answer all questions that may be asked, and do not hang up until the communication is complete and you are told to do so. Use a telephone away from the fire area.

⇨ If possible, send someone to the roadway or door of involved building to direct firefighters when they arrive. In case of a major fire or if there is the possibility of an explosion, go to a prearranged safe area and report to your supervisor.

⇨ If your clothing should catch fire, STOP, DROP, and ROLL. If possible, smother the flames with a coat, blanket, or anything available.

ACE-SAGINAW PAVING CO. HAND AND POWER TOOLS SAFE WORK POLICY

ALL ACE-SAGINAW PAVING CO. EMPLOYEES SHALL FOLLOW THE FOLLOWING POLICY WHEN WORKING ON COMPANY PROPERTY AND/OR CUSTOMER OWNED JOB SITES.

- ⇨ All hand tools must be inspected each time before use. Mushroomed, cracked, or chipped heads and rough, splintered or badly worn handles must be removed from service until repairs can be made. Proper PPE must be worn when working with hand tools. Minimum requirements are; hardhat, safety glasses, steel-toed boots. Gloves are required for most tasks, but are not to be used when using a grinder. Refer to JSA for any other PPE required for specific jobs.

- ⇨ If you use your personal tools, repair or replace them as soon as they become worn or defective. All tools are subject to periodic inspection by supervision and must be repaired or replaced if found to be unsafe.

- ⇨ Use the correct tool for the job and keep tools clean. Never use tools and equipment for purpose for which they were not designed or intended.

- ⇨ Tools shall be transported in toolboxes, tool belts, tool pouches, etc. designed for such use. Do not carry tools in pants or shirt pockets.

- ⇨ Never throw tools, equipment, or parts from one location to another, from one employee to another, or from one level to another level.

- ⇨ Do not leave tools, equipment, or materials in elevated locations from which they could fall or be knocked off.

- ⇨ Maintain secure footing and balance while applying pressure on a wrench or other tool so you do not fall if the tool suddenly moves or slips from its bite.

- ⇨ Do not force tools beyond their capacity. Do not use "cheaters" to increase their capacity.

- ⇨ Do not fabricate hand tools. Do not modify or in any way alter the design of existing hand tools.

- ⇨ Only approved lock blade pocketknives and self-retracting utility knives are permitted in the plant. Always cut in the direction away from yourself when using a pocketknife.

- ⇨ Wire stripping tools shall be used when preparing electrical wire.

- ⇨ Powered hand tools**.** All powered hand tools and equipment must be inspected prior to each use. All tools must be physically and mechanically sound, and appropriate for the job. Defective tools must be removed from service immediately. Also, any tool that is not in compliance with MIOSHA standards is prohibited and shall be tagged out or made inoperable and removed from the plant site.

- ⇨ All power tools must either be double insulated or have a proper three-wire cord with a proper grounding plug. Electric tools with broken three-pronged grounding plugs must be removed, replaced or repaired before use.

- ⇨ All portable cord and plug electric tools must be connected to a Ground Fault Circuit Interrupter (G.F.C.I).

- ⇨ Electrical power tools are not to be used in hazardous locations as defined by the National Electric Code unless the tool is approved for service in that environment.

- ⇨ Guards or shields specifically designed for portable power tools must be installed before use. Never use tools or equipment if guards or shields are defective or have been removed.

PNEUMATIC POWER TOOLS

- ⇨ Pneumatic power tools and all accessories must be inspected prior to each use. Defective tools must be taken out of service immediately and must be repaired or replaced before being returned to service.

- ⇨ Hoses shall be secured to pneumatic tools by a positive means to prevent the tool from being accidentally disconnected.

- ⇨ Safety clips or retainers shall be installed on pneumatic tools to prevent attachments from flying off.

- ⇨ All hoses, fittings, and clamps must be of specific design for the pneumatic tool being used and you must follow the manufacturers' instructions for their assembly. Automotive radiator hose clamps are not permitted on air hoses.

- ⇨ Pneumatic hose sections must have a positive means of holding couplings together.

GENERAL PRECAUTIONS

- ⇨ Cup-type goggles, mono-goggles or cup-type side shield safety glasses along with a full-face shield must be worn when using air operated drills, jackhammers, grinders, sanders, and cut-off saws.

- ⇨ Never direct compressed air toward yourself or anyone else for any reason. Never use compressed air to clean your person, clothing being worn, or that of another person.

- ⇨ Pressure of compressed air used for cleaning parts or machinery shall not exceed 30 PSI and then only with effective chip guarding and proper PPE. NOTE: when you are finished with air-powered tools, disconnect the air hose and release the residual pressure in the tool by depressing the trigger.

- ⇨ Never use fixed or portable grinders without the use of protective shielding and proper eye protection (safety glasses with side shields and full-face shield).
- ⇨ On pedestal and bench grinders the tool rest must be adjusted to have a 1/8 inch maximum gap from grinding wheel, and the upper tongue guard not more than ¼ inch from the grinding wheel

- ⇨ Prior to installation, all grinding wheels shall be inspected for damage. This inspection will include a ring test when appropriate.

- ⇨ The speed rating marked on the grinding wheel must meet or exceed the spindle speed of the grinder.

- ⇨ Gloves should not be worn when using a pedestal or bench grinder.

HYDRAULIC TOOLS

- ⇨ Hydraulic tools and jacks shall have a documented thorough inspection every 6 months. The inspection records will be maintained in the department for the life of the tool or jack.

- ⇨ Hydraulic tools and jacks must be inspected before and after each use.

- ⇨ The rated load capacity on hydraulic jacks must be legibly and permanently marked in a prominent location on the jack.

- ⇨ Hydraulic powered tools and jacks shall not be used in a manner that will exceed the rated load or any other capacity of the tool.

- ⇨ Clean and store tools in designated storage area when job has been completed.

HOIST, RIGGING AND CRANES

HOIST AND RIGGING SAFETY

1. All personnel involved in hoist and rigging work must know and never exceed the load limit of the hoisting equipment as well as the rigging equipment.

2. Only trained and authorized personnel shall operate lifting equipment.

3. Load limit of hoist must be displayed on the block and be visible from floor level.

4. Chains and slings must be tagged with their weight capacity.

5. All rigging equipment must be inspected prior to each use and as often as necessary during use to ensure that is safe.

6. Hoist equipment inspection must include a check of all controls to verify proper function

7. Check brakes for excessive drift.

8. Check pendant cables for cuts, kinking, or signs of wear.

9. Check swaged sockets for damage and pins for excessive wear.

10. Check hoist rope for fraying, kinking, crushing, twisting, bird caging, and for broken strands.

11. Inspect the hook for cracks, distortion, bending, and ensure that the latch gate is intact and operable.

12. Lifting and moving the load. When using a pendant-operated hoist, be positioned on the pendant side of the hoist to get maximum clearance from the load and to minimize entanglement of cables.

13. Position the hoist directly over the load.

14. Avoid swinging the hook or the load when moving the hoist.

15. After the hook is placed in the lifting ring, apply slight pressure to the hoist to ensure the lifting ring is seated in the bottom of the hook, the latch gate is closed, and that the hook is properly aligned.

16. Lift in a straight line so that neither hoist body nor the sling is angled around anything.

17. Attach sufficient guide ropes (tag lines) to control the load being moved.

18. Raise the load only high enough to avoid obstructions.

19. Check the intended movement path to see that it is clear of people and obstructions and to see if the intended destination is ready to receive the load.

20. Never hoist loads over workers and never allow anyone to walk, work, or stand under a suspended load.

21. Never leave unattended load suspended in air

22. Avoid sudden starts and stops.

23. Avoid shock loading.

24. Never carry anyone on the hook or load.

25. Do not permit the operator or tag line handlers to become distracted.

26. Never use the hoist rope or chain as a sling.

27. Never use hoist chain or rope as a ground for welding nor touch a live welding electrode to the chain or rope.

28. Never replace a clevis pin with a bolt.

29. Never make repairs or adjustments to any part of a hoist unless you are trained and authorized to do so.

30. Inspection records must be kept on chains, hooks, etc. in accordance with Federal guidelines.

31. All damage and defects found must be reported to supervision and equipment must be removed from service and must not be used until damaged parts are repaired or replaced.

32. When not in use, all rigging equipment must be stored in designated area.

CRANES

Note: Ace-Saginaw Paving Co. and its employees do not own or operate cranes, the operation of a crane on the company property or job site will be conducted by a certified contractor. The following regulations will be required by all contractors working on Ace-Saginaw Paving Co. properties or projects.

33. Employees will follow the manufactures limitations at all time.

34. Employees will follow the manufacturer's rated load capacities and recommended operating speeds. Ensure that rated load and operating loads are clearly visible from the operator seat.

35. Refer to ANSI standard hand signals.

36. Operator must inspect the equipment prior to each use; ensure that all safety devices are in place. Operator will ensure that all Fire Extinguishers are rated to a minimum of A, B, C and that they are fully charged (arrow in the green) and that access to all Fire Extinguishers are clear. Operator will fill out the daily crane inspection sheet, and turn into the shop. Shop supervisor or designate will inspect crane weekly and fill out weekly inspection sheet.

37. The Crane will be inspected semi-annual by the corporate Crane Manager and Electrical Manager inspection shall meet the applicable requirements for design, inspection, construction, testing, maintenance and operation as prescribed in the ANSI B30.5-1968. All reports and findings will be taken care of by the shop supervisor. Site safety department will keep record of all inspections and findings.

38. No modifications or additions will be made with the manufacturer's written approval.

39. Operator must read and understand Job Safety Analysis. Operator must understand and be able to calculate loads and understand the posted load chart. Operator must be physically able to complete the job.

ACE-SAGINAW PAVING CO. FIRST AID, CPR & AED

POLICY STATEMENT

In the interest of the well-being of the employees of Ace-Saginaw Paving Co. and to comply with MIOSHA requirements, members of the management team and hourly employees will be trained and certified in the application of First Aid, CPR and Automatic External Defibrillation devices. This training will be received from the American Heart Association or an equivalent.

FIRST AID, CPR & AED

- ⇨ In the event of an employee injury, managers or employees trained in first aid will determine if care and treatment necessary is within their level of training. If so, treatment should be rendered using first aid supplies from the first aid kit located in the office, plants or company vehicles.

- ⇨ If it is reasonably anticipated that employees will be exposed to blood or other potentially infectious materials while using first aid supplies, appropriate personal protective equipment in compliance with Occupational Exposure to blood borne pathogens standard 1910.1030(d)(3) shall be utilized. This equipment will be available at no cost to the employee.

- ⇨ The standard lists appropriate PPE for this type of exposure, such as gloves, face shields, masks, and eye protections. This equipment is contained in the Blood Borne Pathogen kit.

- ⇨ If the determination is made that the injury is beyond the level of first aid, emergency medical first responders must be called. In the time it takes for the ambulance to arrive at our location, keep the injured employee as calm as possible and do not allow them to move around in order to prevent aggravation of their injury.

- ⇨ If an employee has foreign material in their eyes, they must utilize the eyewash stations in the plants, labs or maintenance garages or portable eye wash solution in company vehicles. Eyelids must be held open so that the stream of water can flush away foreign material. Employee should continue flushing their eyes until medics arrive and then follow their instructions. This eyewash solution shall also be used in the event a chemical has made contact with an employee's body and must be washed off of the skin.

- ⇨ Any employee who is injured beyond the scope of first aid must be transported to clinic by a supervisor or to the emergency room by ambulance.

- ⇨ The first aid kit must contain items appropriate to the anticipated type of injuries expected to occur based on the scope of work being done, and shall be stored in a weather proof container. If the scope of work changes, the contents of the first aid kit must be updated to reflect the possible hazards.

- ⇨ The contents of the first aid kit must be in individual sealed packages for each type of item.

- ⇨ When first aid supplies are used to treat an injured employee, they must be logged on the inventory list so they can be replaced. Further, an inventory of contents must be done weekly and before being sent out to a remote job site to insure the kit is appropriately stocked.

- ⇨ After the injured employee has been treated or transported, injury reports must be completed.

- ⇨ Remember, in the event of any injury, first aid must be administered quickly, prudently, but only within the scope of your training. If in doubt, call for help.

- ⇨ In the event an employee is required to perform CPR, protective barriers for rescue breathing are available in every first aid kit.

BLOOD BORNE PATHOGENS

POLICY STATEMENT

POLICY: Blood Borne Pathogens Exposure Control Plan

PURPOSE: To limit or eliminate employee exposures to blood borne pathogens through education, information, engineering controls, administrative controls, personal protective equipment and other methods in an effort to comply with all applicable laws and regulations.

SCOPE: All employees and locations covered under the MIOSHA regulations and any on-site contractors.

GENERAL: The Blood borne pathogens standard was designed to prevent the transmission of diseases resulting from contact with pathogens carried in human blood and other potentially infectious body fluids. This contact may take place when an employee's non-intact skin or a mucous membrane is exposed to blood or other potentially infectious materials from another person while at work. Non-intact skin can be any type of opening in the skin such as a cut or scrape.

The MIOSHA Blood borne pathogens standard appears in the General Industry section of the regulations. Construction does not have a standard dealing with this issue. This area is also not regulated by MSHA.

However, Ace-Saginaw Paving Co. will train all employees concerning this standard and provide all necessary controls and personal protective equipment to safeguard our people.

As stated in the Exposure Control Plan, no Levy Company, including Ace-Saginaw Paving Co., has an occupational job classification, which requires or designates an employee to personally respond in the case of a medical emergency. Even though some employees have had training in CPR and first aid, these employees and other, non-trained employees may lend assistance to others during an emergency or in the event of need and this assistance is rendered as collateral duty only.

This collateral duty assistance does not require the company to supply our employees with the Hepatitis B vaccine prior to exposure. The company is also not required to offer contractor employees the Hepatitis B vaccine.

However, if an employee is occupationally exposed to blood or other potentially infectious material, the company will investigate each incident on a confidential basis, provide all medical treatment necessary (including the Hepatitis B vaccine and vaccination series, if indicated) and provide any counseling, if needed.

The Blood borne pathogens standard is performance oriented. The company must develop policies, procedures and training programs to ensure employees safety and knowledge in order to comply with the standard. These programs are to be site specific according to materials on hand and the needs of the employees involved.

Each company location will maintain a site specific Exposure Control Plan that explains how the location handles the requirements of the standard. Each location shall use the guideline plan supplied and then make the necessary modifications and additions to make the program site specific. Every company location with an Exposure Control Plan shall annually review their written plan and revise as needed.

Questions concerning the Blood borne pathogens standard may be directed to the location supervisors, the Safety Department or may be researched by looking in the location's Exposure Control Plan and associated policies.

PROCEDURE: Ace-Saginaw Paving Co.'s written Exposure Control Plan is the guideline procedure to cover this standard. It explains how the company handles all aspects of the regulation for each company location. Each written Exposure Control Plan shall be adapted to suit the conditions and materials found at the individual site. Consult the written materials at your location for details.

SCOPE AND APPLICATION

- ⇨ This Exposure Control Plan was developed in accordance with 29 CFR 1910.1030, the Blood Borne Pathogens Standard, promulgated by the Occupational Safety and Health Administration (OSHA).

- ⇨ The Exposure Control Plan is designed for any Ace-Saginaw Paving Co. employee who may have potential for occupational exposure to blood and other potentially infectious materials that may pose a potential risk of transmission of Hepatitis B (HVB), Human Immunodeficiency Virus (HIV) and other potentially infectious blood borne diseases. Exposure determination shall be made without regard to the use of personal protective equipment.

- ⇨ Each Ace-Saginaw Paving Co. location will receive a copy of the Exposure Control Plan and the location manager or designated representative will review and revise the plan to make it site specific. The Exposure Control Plan must be readily available to all employees. The location manager or designated representative will review the Exposure Control Plan at least annually or more frequently if exposures change (Appendix A).

- ⇨ It is the policy of Ace-Saginaw Paving Co. to prevent exposure incidents to potentially infectious materials by our employees whenever possible.

- ⇨ The company also strives to prevent exposure incidents involving contractors on our sites. Therefore, each location manager or designated representative is responsible for

informing contract services, such as housekeeping services, of their obligations under this standard and insuring compliance before contractors are allowed on site.

JOB CLASSIFICATIONS WITH POTENTIAL FOR EXPOSURE

- ⇨ *This type of assistance is rendered as collateral duty only, not designated nor required by job classification. It is up to the individual employee whether or not to provide assistance.*

- ⇨ The company will provide training and information to our employees to reduce the risk of exposure to those who may provide assistance.

- ⇨ Activities associated with first aid that may produce an exposure to blood and other potentially infectious materials include, but are not limited to, cleansing open wounds, applying dressings, mouth-to-mouth resuscitation, handling of body fluid spills, cleaning after a spill and handling contaminated clothing or surfaces.

- ⇨ Contract housekeeping personnel have a minimal potential for exposure to blood and other potentially infectious materials.

- ⇨ Housekeeping activities associated with potential exposure may include, but are not limited to, cleaning blood spills, handling bagged sanitary napkins or tampons, general cleaning of bathrooms and other working surfaces and handling general waste with the rare handling of bagged, potentially infectious waste.

DEFINITION OF TERMS

1. Blood - human blood, human blood components and products made from human blood.

2. Blood borne pathogens - pathogenic micro-organisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human Immunodeficiency virus (HIV).

3. Contaminated - the presence or the reasonably anticipated presence of blood or other potentially infectious materials.

4. Contaminated laundry - laundry that has been soiled with blood or other potentially infectious materials or may contain sharps.

5. Contaminated sharps - any contaminated object that can penetrate the skin including, but not limited to, needles, scalpels, broken glass, broke capillary tubes and exposed ends of dental wires.

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

7. Engineering controls - controls (e.g. sharps disposal container, self-sheathing needles) that isolate or remove blood borne pathogens from the workplace.

8. Exposure incident - Blood or Other Infectious Body Fluids (OIBF) that comes in contact with an open wound, mucous membranes, the eyes or a puncture wound or injury to the responding employee that exposes him/her to the victim's blood or OIBF.

9. Hand-washing facilities - a facility providing an adequate supply of running potable water, soap and single use towels or hot air drying machines.

10. Licensed healthcare professional - a person whose legally permitted scope of practice allows him or her to independently perform the activities required by the sections labeled "Hepatitis B Vaccination Requirements" and "Post-Exposure Incidents and Evaluation".

11. HBV - hepatitis B virus

12. HIV - Human Immunodeficiency Virus

13. Occupational exposure - reasonably anticipated skin, eye, mucous membrane or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

14. Other potentially infectious materials - include (1) the following human fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood and all body fluids in situations where it is difficult or impossible to differentiate between body fluids. (2) Any unfixed tissue or organ (other than intact skin) from a human (living or dead). (3) HIV-containing cell or tissue cultures, organ cultures and HIV- or HIV-containing culture medium or other solutions; and blood, organs or other tissues from experimental animals infected with HIV or HBV.

15. Parenteral - piercing mucous membranes or the skin barrier through such events as needle sticks, human bites, cuts and abrasions.

16. Personal Protective Equipment - is specialized clothing or equipment worn by an individual for protection against a hazard. Any PPE required must be supplied at no cost to employees.

17. Regulated waste - liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; contaminated sharps, and pathological and microbiological wastes containing blood or other potentially infectious materials.

18. Sharps - any object that can penetrate the skin including, but not limited to: needles, scalpels, broken glass and blood test lancets.

19. Source Individual - any individual, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to the employee.

20. Sterilize - the use of a physical or chemical procedure to destroy all microbial life including highly resistant bacterial endospores.

21. Universal precautions - an approach to infectious control. According to the concept of universal precautions, all human blood and certain human body fluids are treated as if known to be infectious for blood borne pathogens.

22. Work practice controls – controls that reduce the likelihood of exposure by altering the manner in which a task is performed.

EXPOSURE CONTROL

⇨ Although the normal duties and tasks of our employees do not include any exposure to blood borne pathogens, the company feels a responsibility to train our employees in how to prevent possible exposure incidents and what steps to take in the event of an exposure.

⇨ The control of potential exposures will be governed in the following manner:

a. Universal Precautions - any employee who may come into contact with blood and other potentially infectious materials must practice "universal precautions" at all times. This means the employee assumes that any of these materials are contaminated and must take precautions to prevent exposure.

b. Engineering and Work Practice Controls - these controls serve the purpose of eliminating or minimizing employee exposure to blood, other potentially infectious materials or blood borne pathogens. The following engineering and work practice controls are required at each Ace-Saginaw Paving Co. facility:

1. Hand washing facilities are readily available. For job sites that do not have hot running, potable water available for this purpose, antiseptic towellettes or the equivalent must be available.

2. All contaminated sharps (blades, broken glass, needles, scissors, etc.) must be placed in an appropriate sharps container immediately after use. Sharps are not to be removed from a sharps container. Sharps containers are to have a biohazard label affixed for identification purposes and shall be disposed when partially full. Sharps containers shall be closable, puncture resistant containers with a biohazard label and disposal shall be as hazardous waste.

3. Eating, drinking, smoking, applying cosmetics and handling contact lenses are prohibited in work areas where there is a potential for exposure to blood borne or other infectious materials.

4. All first aid procedures involving blood and other potentially infectious materials shall be performed in such a manner to minimize splashing, spraying, spattering and generation of droplets of these substances. Personal protective equipment where available, will be worn during these procedures, such as latex gloves (or equivalent protection), eye protection and facemask. Other protection may be necessary in some circumstances. All of this equipment is one time use only. It must be disposed of in an appropriate manner.

5. All items contaminated with blood or other potentially infectious materials shall be placed in a leak-proof, non-breakable container that is labeled with a biohazard label. This material is to be disposed of as hazardous waste.

All sanitary napkin and tampon disposal bins shall be lined with plastic bags, which are removed and replaced daily. These items do not meet the definition of regulated waste under this standard and pose minimal risk of exposure to employees, so they can be disposed of in sealed plastic bags in regular waste containers.

6. Latex gloves and facemasks will be made available in all company first aid kits and stations. All personnel already have safety glasses. Gloves shall be worn when it can be reasonably anticipated that the employee may have hand contact with blood or other potentially infectious materials, mucous membranes, non-intact skin or contaminated items or surfaces. Hand washing after glove removal is required. If hand-washing facilities are not available immediately after gloves are removed, antiseptic towellettes must be available and used. As soon as practical afterwards, the employee must find and utilize hand-washing facilities. All gloves and masks must be disposed of, in an appropriate manner, after use.

7. All working surfaces and equipment contaminated by blood and other potentially infectious materials shall be cleaned and decontaminated with a mixture of household bleach and water (concentration 1:10) or other EPA approved disinfectants. All outdoor sites can be decontaminated with large amounts of high-pressure water or large amounts of water and a shop push broom.

8. All employee clothing that is contaminated by blood or other potentially infectious materials shall be cleaned and disinfected by an outside source that is competent in these procedures (purchasing will contract with a designated service) or the clothing can be placed in a designated "biohazard" container and disposed of properly. Any contaminated, employee owned clothing that cannot be decontaminated and is properly disposed of, must be replaced by the company.

Contaminated clothing being sent out for cleaning and decontaminating shall be placed in leak-proof plastic bags that contain a biohazard label as a warning to those who must handle the bag and the clothing.

9. All potentially infectious waste shall be disposed of according to local, state and federal regulations. Biohazard warning labels must be prominently displayed on all containers.

HEPATITUS B VACCINATION REQUIREMENTS

- ⇨ Employees who have risks of exposure to blood and other potentially infectious materials due to their job classification and duties must be offered Hepatitis B vaccine and vaccination series, if medically qualified. Vaccinations, if required, must be supplied at no cost to employees. Ace-Saginaw Paving Co. has no job classification, which would require the company to offer the vaccination series to the holder of that job.

- ⇨ This requirement to offer the Hepatitis B vaccination series prior to exposure does not apply to those employees, trained in first aid, who render first aid only as a collateral duty, responding solely to injuries resulting from workplace incidents. However, any employee having an exposure incident must follow the procedure listed in the Post-Exposure Incident section of this plan. The requirements of this section provide for the offering of the Hepatitis B vaccination series to an employee exposed to potentially infectious materials and medically evaluated to be able to receive the series. I the exposed employee declines the Hepatitis B vaccine, the "Declination" form (Appendix B) must be signed by the employee.

- ⇨ The Safety Director and the Human Resource Manager (or designated representatives) shall jointly be responsible for selecting a licensed healthcare professional to administer the Hepatitis B vaccination program and post-exposure medical evaluation and follow-up.

POST-EXPOSURE INCIDENTS AND EVALUATION

- ⇨ All Ace-Saginaw Paving Co. employees are expected to take due care and follow "universal precautions" whenever they may be exposed to blood or other potentially infectious materials. However, if an employee has an exposure incident in an occupational situation, the following post-exposure procedure is required:

  A. Every exposure incident must be reported immediately by the exposed employee to his or her supervisor. The supervisor must report the exposure incident to the Safety Director or the Human Resource Director as soon as possible.

  B. The exposed employee must complete the employee portion of the "Record of Exposure Incident" form (Appendix C). The balance of the form is to be completed by the supervisor and the Safety Department.

  C. Once the "Record of Exposure Incident" form has been completed by the exposed employee, the Safety Director or Human Resource Director shall immediately make

available to the exposed employee a confidential medical evaluation and follow-up with the selected healthcare professional. All laboratory tests shall be conducted by an accredited laboratory at no cost to the employee.

D. The Safety Director or Human Resource Manager shall provide the selected healthcare professional performing the medical evaluation with the following information:

1. Copy of 29 CFR 1910.1030, Blood Borne Pathogens Standard.

2. A description of the exposed employee's duties as they relate to the exposure incident.

3. Documentation of the route(s) of exposure and the circumstances under which the exposure occurred.

4. Results of the source individual's blood testing, if available.

5. All medical records relevant to the appropriate treatment of the employee, which are the employer's duty to maintain, including the employee's Hepatitis B vaccination status.

E. The exposed employee must be offered the Hepatitis B vaccination series, if the employee has not been previously vaccinated and has been medically evaluated. If the exposed employee declines the Hepatitis B vaccine, the "Declination" form (Appendix B) must be signed by the exposed employee.

F. After an exposure incident, the source individual must be identified, unless the employer can establish that identification is not feasible or prohibited by state or local law.

G. Once the source individual is identified, the source individual's blood shall be tested as soon as possible after consent is obtained from the source individual to determine HBV and HIV infectivity. In cases where consent cannot be obtained, for whatever reason, 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, shall be tested and the results documented.

H. If the source individual is known to be infected with HBV or HIV, further testing is not necessary.

I. The exposed employee must be given the results of the source individual's blood test. At the same time, the exposed employee must also be informed of applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

J. After the exposure incident, the exposed employee has the option of a baseline blood collection, but must provide consent. This sample shall be preserved for at least 90 (ninety) days. Within this 90 (ninety) day period, the exposed employee may consent to having the blood sample tested for HBV and HIV. After consent is given, the sample must be tested as soon as feasible.

K. The Safety Director or Human Resource Manager shall obtain and provide the exposed employee with a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation.

L. The healthcare professional's written opinion for Hepatitis B vaccination shall be limited to whether the Hepatitis B vaccination is indicated for the exposed employee and whether the vaccination was received.

M. The healthcare professional's written opinion for post-exposure evaluation and follow-up shall be limited to information that the exposed employee has been informed of the results of the evaluation and has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment. All other findings or diagnoses shall remain confidential and the healthcare professional shall not include them in the written report.

N. If an employee's blood test indicates a positive result for a blood borne pathogen, professional counseling will be provided, by the company, and be maintained by the company for at least the duration of employment with the company plus 30 years, in accordance with 29 CFR 1910.20.

P. Records to be maintained under this standard include the following:

1. The name and social security number of the employee.

2. A copy of the employee's vaccination status, the dates of all Hepatitis B vaccinations and any medical records relating to the employee's ability to receive vaccination.

3. A copy of all results of examinations, medical testing and follow-up procedures required after an exposure incident.

4. The employer's copy of the healthcare professional's written opinion.

5. A copy of the information sent to the healthcare professional relating to the description of the exposed employee's duties as they relate to the exposure incident, the documentation of the route(s) of exposure and the circumstances under which exposure occurred and the results of the source individual's blood testing, if available.

Q. These employee medical records shall be provided upon written request for examination and copying to the employee, to anyone having written consent of the employee or to representatives of OSHA in accordance with 29 CFR 1910.20.

NON-EMPLOYEE RISK/EXPOSURE CONTROL

- ⇨ Any contractor or subcontractor company or individual performing work for Ace-Saginaw Paving Co. or subsidiary that has the possibility of exposure to blood borne pathogens from any employee while in the performance of their contract, must document compliance with 29 CFR 1910.1030 prior to any work being done.

- ⇨ Types of contractors or subcontractors with some degree of risk include, but are not limited to:
  A. Janitorial services
  B. Laundry services
  C. Healthcare providers
  D. Medical waste transporters
  E. Medical waste disposal services

EMPLOYEE TRAINING

- ⇨ The Blood Borne Pathogens Standard requires the company to train all employees who hold a job classification requiring duties with occupational exposure to blood and other potentially infectious material. Currently there are no employees holding a job classification that require action that would expose the employee to potentially infectious material. Any employee who has received or is scheduled to receive this training will have received training during their first aid class. Training for employees with occupational exposure shall include recognition of hazards associated with exposure to any bodily fluids and secretions (epidemiology and symptoms of blood borne diseases), an explanation of transmission of blood borne pathogens, recognition of biohazard label and proper disposal of contaminated materials. If containers displaying the biohazard symbol are not available, "Red bags or red containers may be substituted for labels." Per OSHA Standard 1910.1030 (g)(1)(E).

- ⇨ Employees with occupational exposure must participate in company training program. Such training shall be provided at the time of initial assignment and annually within 1 year of their previous training.

- ⇨ Training records must include the following information: 1.) Dates of the training sessions; 2.) A summary of the material covered; 3.) Names and job title of all persons attending the training sessions; and 4.) Names and qualifications of persons conducting the training.

- ⇨ Training records shall be maintained for 3 years from the date on which training occurred. Additionally, medical records for all employees with occupational exposure must be maintained for duration of employment plus 30 years.

- ⇨ Availability of records: All records required herein shall be made available upon request to the Assistant Secretary and the Director for examination and copying. Training records shall be provided upon request for examination and copying to employees, to employee representatives, to the Director and to the Assistant Secretary. Employee Medical Records shall be provided upon request for examination and copying to the subject employee, to anyone having written consent of the subject employee, to the Director, or to the Assistant Secretary. Transfer of records shall be in compliance with requirements set forth in OSHA Standard 1910.1020(h)

MOTOR VEHICLES

1. All employees operating Company vehicles must have the appropriate license for the vehicle they are operating

2. All operators of Company vehicles shall use due care and caution.

3. Check your vehicle carefully before leaving the garage or Company location.

4. Take into account not only your shortcomings, but also those of the other drivers on the road.

5. Consider other drivers, anticipate and be prepared for any unsafe act.

6. Know and observe all motor vehicle laws.

7. Be constantly alert and observant.

8. All occupants of any Company owned vehicles shall wear seatbelts.

9. Drivers of Company owned vehicles must observe all traffic regulations on public roads and plant properties.

10. Speed must be governed by posted limit or existing road conditions.

11. Use extra precautions during wet and icy weather.

12. Avoid distractions such as eating or using hand held cell phones while driving.

13. Report all accidents immediately.

FORK LIFT SAFETY

OBJECTIVES OF THE FORKLIFT SAFETY PROGRAM

1. It is the policy of Ace-Saginaw Paving Co. to permit only trained and authorized personnel to operate forklifts including site Supervisors and Plant Manager.

2. To ensure that operators understand the limitations and safe operations of the equipment.

3. Passengers are not permitted to ride on forklift or load.

4. Lounging, meddling, or horseplay on or around the forklift are not permitted.

5. No one will be allowed to stand or walk under elevated forks

6. To ensure that all equipment is properly maintained and is kept good working order.

7. To ensure that equipment malfunctions are noted before accidents occur.

8. To ensure that non-qualified employees do not use this equipment.

9. To ensure that operators receive refresher training as necessary.

10. To ensure that qualified trainers are available to certify new operators and conduct refresher training.

11. Forklifts must maintain a distance of at least 20 feet from all live power lines.

OPERATING RULES

1. Before starting work, inspect the forklift thoroughly using the Pre-Shift Inspection Checklist.

2. If the forklift is in need of repair, do not tamper with the mechanism or attempt to operate it, but report the condition immediately to your Supervisor.

3. Place a "Do Not Operate" tag on forklift steering wheel.

4. Never move the forklift on its own power without being in the driver's seat. Always shut off engine before leaving the forklift unattended.

5. Operate the forklift with care and only for the purpose intended. Before starting or backing, be sure others are in the clear.

6. Pickup load squarely and pile load securely to avoid spillage due to turns, starts, or stops. Observe the load capacity and vertical clearance limits before all lifts are made.

7. Drive forklift downgrade with the load last and upgrade with the load first. On descending grades, keep the forklift under control so that it can be brought to an emergency stop in the clear space in front of the forklift. On all grades, tilt back the mast

and raise the forks as far as necessary to clear the road surface.

8. The flooring of trucks and trailers shall be checked for breaks and weakness before they are driven onto.

9. The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks.

10. Dock plates will be used when loading trucks or trailers. Operators will assure dock plates are in good condition and will store on edge when not in use.

11. Return Forklift Pre-Shift Inspection Checklist.

TRAFFIC RULES

1. Operate under complete control at all times. Pedestrians are given the right of way at all times.

2. Always be prepared for any emergency. Expect the unexpected. Do not rely on the horn. Use the brake.

3. Our maximum speed limit is 10-15 miles per hour. Operate at a speed consistent with conditions (not to exceed established speed limit).

4. Maintain a safe distance of approximately 50 feet from other vehicles.

5. Use your horn. Do not abuse it. Signal when approaching workers, intersecting aisles, blind corners, backing up, pulling forward, and starting equipment.

6. Slow down and sound horn at overhead door openings and other locations where vision is obstructed. If load being carried obstructs forward view, the driver shall be required to travel with the load trailing.

7. Do not pass another truck traveling in the same direction particularly at intersections, blind spots, or other dangerous locations.

8. Keep to the right along aisle ways and outside driveways. Keep out of the pedestrian lanes and safety zones.

9. Avoid quick starts, sudden stops, corner cutting, stunt driving and other unnecessary movement.

10. Maintain a safe following distance behind other vehicles or pedestrians in order to be able to stop in case of an emergency

11. Do not park forklift at locations that would impede the free movement of other vehicles or personnel.

12. Report promptly to your supervisor all incidents to persons or property.

TRAINING

1. All new operators will receive training, which will include class room video and PowerPoint formal instruction, instructor demonstration of forklift operations, also all new forklift operators will be put through an evaluated skills test.

2. Experienced operators will be evaluated at least once every three years.

    A. An evaluation of each powered industrial truck operator's performance is required to be conducted at least once every three years.

    B. The initial training topics do not have to be duplicated for the evaluation of the operator if:

        a. The training was appropriate to the truck and working conditions encountered.

        b. The operator has been evaluated and found competent to operate the truck safely.

    C. Refresher training will be provided to ensure the operator has the knowledge and skills needed to operate the forklift.

        a. It is required to provide refresher training to the operator when:

            i. The operator has been observed to operate the vehicle in an unsafe manner.

            ii. The operator has been involved in an accident or near-miss incident.

            iii. The operator has received an evaluation that reveals that the operator is not operating the truck safely.

            iv. The operator is assigned to drive a different type of truck.

            v. A condition in the workplace changes in a manner that could affect safe operation of the truck.

    D. Certification

        1. It is required to certify each operator as trained and evaluated. The certification requirement includes name of the operator, date of training, date of the evaluation, and identity of person(s) performing the training.

MAINTENANCE AND TROUBLESHOOTING

1. The shop is the primary custodian of the forklifts and responsible for maintenance and troubleshooting. Any equipment deficiencies shall be recorded on the Forklift Pre-Shift Inspection Checklist and immediately reported to shop. The equipment shall

be tagged out in accordance with the Lockout / Tagout procedure.

RESPONSIBILITIES

1. Plant Managers:

    A. It is the responsibility of the Equipment Manager to see that approved procedures are followed, and that adequate resources are provided to ensure compliance with these requirements.

2. Site Supervisors:

    A. It is the responsibility of the Site Supervisors to:

        a. Ensure that any person designated to use forklifts is qualified via documented instruction on the proper use of this equipment.

        b. Ensure only trained employees operate forklifts.

        c. Ensure that trained employees prior to equipment usage complete pre-shift inspection checklist.

        d. Ensure that any equipment deficiencies are immediately reported to the Equipment Manager and that the equipment is immediately tagged out.

        e. Ensure that equipment is received and returned in operable condition. If the equipment is not received in satisfactory condition it shall be immediately returned to the shop for servicing.

        f. Ensure that all trained employees follow Operating/Safety Instructions including Manufacturer's instructions and OSHA requirements.

3. Safety Administrator

    A. It is the responsibility of the Safety Administrator to:

        a. Ensure that training is scheduled every three years, or as required by MIOSHA, for affected employees.

        b. Ensure that training records are maintained and available.

        c. Ensure that Forklift Pre-Inspection Checklists are maintained and available.

4. Employees

    A. It is the responsibility of Employees to: Know and comply with all applicable

sections of this procedure including:

a. Performing pre-shift inspections and turning in completed forms to shop.

b. Attending training.

c. Reporting all equipment problems immediately to shop and to the Supervisor.

d. Returning equipment in the same condition it is received. If the equipment is not received in satisfactory condition, it shall be reported PRIOR TO USE.

e. Secure surrounding area, as needed, for example use caution tape, cones, or ask for assistance from another employee.

WALKWAYS, ROADWAYS, HANDRAILS AND STAIRWAYS

1. Walkways will be kept clean and orderly at all times.

2. Where walkways are adjacent to conveyors, all nip points and pinch points must be guarded.

3. Handrails are required along elevated walkways and must have a top rail positioned 42 inches and mid-rail. A toe-board would also be required if there is a potential for tools, equipment, materials, etc. to fall from an elevated walkway onto traffic below.

4. Follow designated walkways and aisles to and from your work area. Do not use shortcuts. Walk, don't run. Be alert for moving vehicles. Look where you are going. Do not walk backward. Always glance at the walking surface ahead of you. Look both ways before crossing haulage roads or railroad tracks.

5. Driving your car on company premises is a privilege. Do not abuse the privilege by making unauthorized trips, speeding, reckless operation, or parking in an unauthorized area. The driver and all passengers must wear safety seat belts while driving in the plant and whenever driving outside of the plant while on company business. For your own safety, wear your seat belt at all times while driving.

6. Use stairways and walkways as provided. Do not take shortcuts through any posted restricted areas. Go around or use crossover walkways where they have been provided. Do not climb over handrails or equipment.

7. When walking on or alongside roadways, walk facing oncoming traffic. Move to the side; do not force a vehicle to swerve to avoid striking you.

8. Use handrails when going up or down stairs. If carrying an object, one hand must be free for the handrail. Walk, do not run. Do not go up or down more than one step at a time.

9. When walking along conveyor ramps and inclines maintain your balance and use handrails to assure that you do not come in contact with moving machinery or belts.

10. When coming out of buildings adjacent to roadways, be extremely cautious to avoid being struck by any approaching vehicle. Always look both ways before stepping onto the roadway.

11. Report any unsafe conditions to your supervisor immediately.

12. When working around railways employees must wear proper PPE to include, hardhat, gloves, safety glasses, and high visibility clothing (Vest).

13. All new operators will receive training.

14. All training will be documented.

15. Refresher training will be provided to ensure the employee has the knowledge and skills needed to work around railway.

    ⇨ It is required to provide refresher training to the employee when:
        - The operator has been involved in an accident or near-miss incident.
        - The operator has received an evaluation that reveals that the operator is not operating safely.
        - A condition in the workplace changes in a manner that could affect safe operation.

16. Employees will cross railways at existing designated rail crossings only.

17. If lights are flashing or rail crossing arms are down employee will wait until lights are extinguished and arms have been raised before crossing.

18. Employees must come to a complete stop at all railways. Check both ways, look and listen prior to crossing and cross when clear.

19. Employees will never cross in between cars.

20. When on foot and where a rail crossing does not exist employees will look and listen prior to crossing. Employee must never step on tracks, cross in between uncoupled cars or within 10 feet of a parked car.

21. Employees will never attempt to crawl under rail equipment or attempt to cross in front of moving equipment.

22. Employees are never to position any part of their body in a potential pinch point, as rail equipment can move in either direction at any time.

23. Employee must obtain permission from supervisor before performing any work with in six (6) feet of any railroad track.

WORK ZONE SAFETY

SUPPORT

Equally as important as the safety of road users traveling through the temporary traffic control zone is the safety of workers. Temporary traffic control zones present temporary and constantly changing conditions that are unexpected by the road user. This creates an even higher degree of vulnerability for workers on or near the roadway.

TRAINING

Employees involved in setting up traffic control devices will be trained in accordance of the Federal Highway Administration.

SAFETY PRECAUTIONS

The traffic control devices will be placed as designated by the engineered plans, unless specific circumstances exist (i.e. tree branches, curves).

Always stay aware of traffic and stay clear of open lanes. Do not work in an open lane.

While regulating, directing or working near or alongside vehicular traffic, a highly reflective, yellow fluorescent warning vest shall be worn at all times and visible from 360 degrees. The employee is responsible for the care and cleanliness of his or her vest.

A hand-held, two sided 18 inch paddle sign with "STOP" on one side and "SLOW" on the other with a six foot staff shall be used to control traffic.

Barricades may be used to direct vehicular traffic whenever work is being done on a public right of way.

Consult Part 6 of the Michigan Manual on Uniform Traffic Control Devices when implementing traffic control.

When working in or adjacent to vehicular traffic, always face the flow of traffic or use a spotter.

When parking your vehicle on the shoulder of the road to perform work next to an open traffic lane, always double check for traffic before exiting vehicle. Always park in an open area with warning lights activated on vehicle, do not park on a curve or near obstacles that may block you from a driver's vision.

PROCESS SAFETY MANAGEMENT

PURPOSE OF PROCESS SAFETY MANAGEMENT
This section contains requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals.

1. Hazards

   A. Any work performed that would create a unique hazard to Ace-Saginaw Paving Co. personnel or equipment must be reported to a manager as soon as hazard is identified.

   B. Refer to Hazard Identification and Risk Assessment for guidelines in identifying hazards prior to beginning work assignment.

      1) While working with natural gas, propane and oxygen, there is always the chance of fire.

         a. Asphalt Paving Operations: Employees are routinely not exposed to any types of substances that can pose a catastrophic incident.

         b. Hot Mix Asphalt Plants: Facilities hazards are high volume natural gas lines.

2. Incident Reporting

   A. Incidents and near misses must be reported immediately to the Safety Manager.

   B. An investigation of each incident which resulted in, or could have reasonably resulted in a catastrophic release of a hazardous chemical shall be conducted.

   C. An incident investigation shall be initiated as promptly as possible, but not later than 48 hours following the incident.

   D. An incident investigation team shall be established with at least one person knowledgeable in the process.

   E. A report shall be prepared at the conclusion of the investigation which includes at a minimum: Date of incident; date investigation began; a description of the incident; factors that contributed to the incident; and any recommendations resulting from the investigation.

   F. Incident investigation reports shall be retained for five years.

3. Training

A. Employees shall be trained in work practices necessary to perform his/her job in a safe manner. Training can be classroom or on-the-job style.

B. Employees must be instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process being worked on.

C. All training shall be documented. Documentation shall show that employees have received and understood the required training. The documentation shall contain; the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

D. All employees shall be trained to respect the confidentiality of trade secret information when the process safety information is released to them.

HAZARD COMMUNICATION PROGRAM

POLICY

It is the intent of the Edw. C. Levy Co. and subsidiaries to comply with the requirements of the OSHA Hazard Communication Standard as set forth in 29 CFR 1910.1200, 29 CFR 1926.59, MSHA Part 62 and any state or local regulations as applicable. This Written Hazard Communication Hazard Program has been developed, implemented and maintained at all Ace-Saginaw Paving Co. facility and/or jobsite.

GENERAL

The Hazard Communication Standard requires employers to inform their employees of any chemical hazards to which they may be exposed during normal working conditions or in a foreseeable emergency. Chemical manufacturers and distributors are required to evaluate the hazards of their products and provide the purchasers with the information necessary to ensure safe handling, use and storage of the chemicals. Employers are required to communicate this information to employees through the use of material safety data sheets, labels and other forms of warning and employee information and training so employees are able to protect themselves.

HAZARD DETERMINATION

Chemical manufacturers or importers shall evaluate chemical they produced or import to classify the chemicals in accordance with the revised Hazard Communication Standard.

Effective June 1, 2015 – For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and where appropriate, the category of each class that apply to the chemical being classified. This information will be placed in the Material Safety Data Sheet/Safety Data Sheet (MSDS/SDS) and on the product label.

Ace-Saginaw Paving Co. will rely on a master list of MSDS/SDS's obtained from product suppliers to determine which chemicals are classified as hazardous for employees.

LABELING

A. Site Supervisors will be responsible for seeing that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled.

B. All labels shall be checked for:

Current Requirements:	Requirements effective June 1, 2015:
1. Identity of the material 2. Appropriate hazard warning for the material 3. Name and address of the responsible party. (Only if the container is received from the manufacturer, distributor or importer.)	1. Product Identifier 2. Signal Word 3. Hazard Statements 4. Pictograms 5. Precautionary statements 6. Name, address and telephone number of the chemical manufacturer, importer or other responsible party

C. Each employee shall be responsible for ensuring that all secondary containers used in their work area are labeled with the appropriate product identifier and provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Note: Workplace labeling, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either:

- The information specified for labels on shipped containers
- Or, Product identifier words, pictures, symbols or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

SAFETY DATA SHEETS

Every chemical entering our facility or jobsite shall have a representative MSDS/SDS or immediately obtain one before employees are exposed to its possible hazards. Changes to MSDS/SDS format effective June 1, 2015 – Chemical manufacturers or importers shall ensure that MSDS/SDSs for their products include the following Sections in order:

Section 1: Identification;

Section 2: Hazard(s) Identification;

Section 3: Composition/Information on Ingredients;

Section 4: First Aid Measures;

Section 5: Fire Fighting Measures;

Section 6: Accidental Release Measures;

Section 7: Handling and Storage;

Section 8: Exposure Controls / Personal Protection;

Section 9: Physical and Chemical Properties;

Section 10: Stability and Reactivity:

Section 11: Toxicological Information;

Section 12: Ecological Information;

Section 13: Disposal Considerations;

Section 14: Transport Information;

Section 15: Regulatory Information; and

Section 16: Other Information, including date of preparation or last revision.

A. The Safety Manager will be responsible for compiling and maintaining the master MSDS/SDS file. The file will be kept at 2981 Carrollton Rd. Saginaw, MI 48604.

B. Additional Copies of MSDS/SDSs for employee use are located in/at plant control rooms, garages, quality control labs and paving foremen pickups.

C. MSDS/SDSs will be available for review to all employees during each work shift. Copies will be available upon request to the Safety Manager.

D. Posters identifying the person responsible for maintaining MSDS/SDSs and where the MSDS/SDSs are located are posted at employee entrances. Posters notifying employees when new or revised MSDS/SDSs are received will be located in the same locations.

E. If a required MSDS/SDS is not received, the Safety Manager shall contact the supplier to request the MSDS/SDS. If an MSDS/SDS is not received after two such requests, the Safety Manager shall contact the MIOSHA's Construction Safety and Health Division at (517) 322-1856 or General Industry Safety and Health Division at (517) 322-1831, for assistance in obtaining the MSDS/SDS.

The MIOSHA Program does not maintain a library of MSDS/SDSs. However, either of the above divisions will assist an employee in obtaining a copy of an MSDS/SDS by contacting the employer or supplier.

EMPLOYEE INFORMATION AND TRAINING

A. The Safety Manager shall coordinate and maintain records of employee hazard communication training, including attendance rosters.

B. Before their initial work assignment, each new employee will receive hazard communication training. This will include the following information and training:

Information:

- The requirements of the MIOSHA Hazard Communication Standard.
- All operations in their work area where hazardous chemicals are present.
- Location and availability of the written hazard communication program, the list of hazardous chemicals and the MSDS/SDSs.

Training:

- Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area.
- The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work are.
- Measures the employees should take to protect themselves from these hazards.
- Details of the hazard communication program, including an explanation of the new label elements (product identifier, signal word, hazard statements, pictograms and precautionary statements) on shipped containers and the workplace labeling system used by their employer, the new SDS format/sections. And,
- How employees can obtain and use hazard information.

C. The employee shall be informed that:
    1. The employer is prohibited from discharging or discriminating against an employee who exercises his or her rights to obtain information regarding hazardous chemicals used in the workplace.

    2. As an alternative to requesting an MSDS/SDS from the employer, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517) 322-1856, or the MIOSHA General Industry Safety and Health Division at (517) 322- 1831 to obtain the desired MSDS/SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.

D. Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training.

HAZARDOUS NON-ROUTINE TASKS

A. Occasionally, employees are required to perform non-routine tasks (i.e., clean, enter confined spaces, etc.). Prior to starting work in such areas, each employee will be given information about the hazards of the area or procedure. This information will include:

    1. Specific chemical hazards.

    2. Protection/Safety Measures the employee can take to lessen risks of performing the task.

    3. Measures the company has taken to eliminate or control the hazard, including:
        i. Air monitoring,
        ii. Ventilation requirements,
        iii. Use of respirators,
        iv. Use of attendants to observe procedures, and
        v. Emergency procedures.

B. It is the policy of Ace-Saginaw Paving Co. that no employee will begin performance of a non-routine task without first receiving appropriate safety and health training.

C. Hazardous non-routine tasks that we have at our facility include:

1. Plants – Asphalt cement above ground storage tank maintenance.
2. Paving – There have been no hazardous non-routine tasks identified within the company's asphalt paving operations.

MULTI-EMPLOYER WORKSITE – INFORMING CONTRACTORS

A. If our company exposes any employee of another employer to any hazardous chemicals that we produce, use or store, the following information will be supplied to that employer:
   - The hazardous chemicals they may encounter.
   - Measures their employees can take to control or eliminate exposure to the hazardous chemicals.
   - The container and pipe labeling system used on-site.
   - Where applicable MSDS/SDSs can be reviewed or obtained.

B. Periodically, our employees may potentially be exposed to hazardous chemicals brought on our site by another employer. When this occurs we will obtain from that employer information pertaining to the types of chemicals brought on-site, and measures that should be taken to control or eliminate exposure to the chemicals.

C. It is the responsibility of the Project Manager / Engineer to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. To ensure that this is done the following mechanism will be followed:

   - Respective Project Managers will request in writing from the sub-contractor a list of potentially harmful products.

PIPES AND PIPING SYSTEMS

Information on the hazardous contents of pipes and piping systems will be identified by:

- Color coded labels including material and direction of travel within the pipeline.

LIST OF HAZARDOUS CHEMICALS

A list of hazardous chemicals used by Ace-Saginaw Paving Co. is located at 2981 Carrollton Rd. Saginaw, MI 48604. Further information regarding any of these chemicals can be obtained by reviewing its respective MSDS/SDS.

Note: Materials which can be purchased by the ordinary household consumer, and which are used for the intended purpose and amount as by the ordinary household consumer, are not required to be included in this list.

Subcontractor Safety

All subcontractors shall review and abide by these safety rules and policies while working on Ace-Saginaw Paving Company Projects. All subcontractors are subject to review of Site Specific Safety Expectations as detailed in the attached Subcontractor Audit Form.

Sub Contractor

Site Specific Safety Expectations

Date: _____/_____/_____ Jobsite: _____

Sub Contractor: _____ Work Type: _____

Review Performed By: _____

Yes	No	N/A	Topic
Sub-Contractor			1. Name of Foreman:
Sub-Contractor			2. Name of Project Manager & Phone #:
❑	❑	❑	3. Does the sub's crew have an understanding of the work task
❑	❑	❑	4. Is the sub's crew familiar with our subcontractor safety program
❑	❑	❑	5. Does the sub have a copy of their company safety program on site
❑	❑	❑	6. Are all employees using proper PPE, Class II retro-reflective vests
❑	❑	❑	7. Are employees obeying customer rules (i.e.; hard hats, gloves, etc.)
❑	❑	❑	8. Are proper signs in place using the MMUTCD
❑	❑	❑	9. Are barricades in place where appropriate (sidewalks, doorways)
❑	❑	❑	10. Are employees staying clear of open traffic lanes
❑	❑	❑	11. Is the proper equipment being used for the task
❑	❑	❑	12. Does the crew perform safety talks at least weekly
❑	❑	❑	13.
❑	❑	❑	14.
❑	❑	❑	15.
❑	❑	❑	16. Serious Safety Violations - Failure to follow will lead to removal from the site ✓ Lockout / Tagout Policy ✓ Fall Protection Policy ✓ Confined Space Entry Policy ✓ Overriding or interfering with safeguards on equipment or tools

1. Document the name of the on-site foreman.
2. If available, document the name of the sub's Project Manager.
3. Is the crew familiar with the task that they are performing and has had sufficient training.
4. Has the Project Manager or Foreman discussed our company's safety expectations.
5. As required by MIOSHA, is there a copy of the sub's safety program or accident prevention program on site.
6. As required by Federal Law, everyone working on roadways is required to wear a minimum of a Class II retro-reflective vest. Other PPE should be determined by the task they are performing, i.e. steel toed boots, safety glasses.
7. Some project customers require additional PPE such as hard hats, gloves, etc. Subs must comply with these rules also.
8. Proper Traffic Control as outline by the MMUTCD shall be set up when based on the job scope. Traffic Regulators shall be wearing the proper PPE required.
9. Proper barricades need to be in place such as pedestrian areas.
10. All employees shall stay away from open traffic lanes and perform their work inside work zone closures only. Proper lane closures shall be set up if work need to be done outside of the current closure.
11. All tasks shall be performed using the proper equipment required for the task.
12. Safety talks should be conducted at a minimum of once weekly, documented and available on site.
13. Additional site concerns
14. Additional site concerns
15. Additional site concerns
16. Serious Safety Violations – These rules are based on incidents that could seriously injure or kill someone.