IMEDCO AMERICA

SAFETY PROGRAM

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Contents

SECTION A – JOB REQUIREMENTS

IMEDCO Scope(s) of Work: (See appendix I "Scope of Work Checklist")

Installation of 250 or 500 ton self-supporting C1006 Magnetic Shield (if applicable).

This work includes the placement of steel plates to further shield the surrounding areas from the 5 Gauss line produced by the MRI Scanner. The installation consists of unloading, preparation, handling, transfer, elevation and welding of large heavy steel plates.

The steel plates will require grinding to remove any slag produced in the cutting and annealing processes for welding edge preparation.

Steel plates will be transported from the staging area to the construction site. Depending on site conditions movement of the plates to the installation area may require use of a crane. When possible, plates will be transported by use of a forklift. If a crane is required, lifting lugs will be welded in position by IMEDCO welders at that time. Crane operation and rigging of these plates is not performed by IMEDCO, its subcontractors or its employees. IMEDCO contracted forklift trucks will be waiting to move the individual plates into position in the pit area. The pit area is a formed concrete pit constructed by others prior to IMEDCO arrival. The plates will be set in proper sequence for the installation. In order to set the plates into position within the pit area, the fork lifts will be fitted with a custom lifting beam and eyes to lift the plates into their installation position. The plates will be temporarily clamped by various approved techniques for welding. Welding to the required engineering-approved specifications will be carried out by certified welders.

The installation sequence is to lay the floor plates into position at the base of the room depression. The forklift is to then be transferred to the floor depression to follow on with the wall plates installation, which will be preceded by setting of critical wall plates on the short side access of the pit to enable possible handling of these plates when necessary for the upper level. The installation of the wall plates is to continue until the first stage of installation, up to the surrounding floor level, is completed. There are several techniques that may be utilized based on final site conditions. One such technique would be the use of a spreader beam held up by two (2) fork lifts that will straddle the pit to set the steel plate layers of the lower wall section.

Infill of the lower portion of the magnet shield box to a pre-designed level is to be carried out by others and allowed to dry. Next, the installation of the remaining wall and ceiling plates is to follow. A temporary access tower is to be used to provide a working platform for welding of the ceiling plates. Upon completion of the magnetic shield installation, all equipment will be removed to allow for the installation of the RF Shield within the magnetic steel shield. In order to enable the magnet entry into this shield when it is appropriate, a section of the rear wall will be left out so that adequate clearance height is provided for the rigging (by others) of the magnet into the shield. Upon completion of the magnet installation, the remaining steel section will be welded into place.

Installation of <250 ton self-supporting C1006 Magnetic Shield (if applicable)

This work includes the placement of steel plates to further shield the surrounding areas from the 5 Gauss line produced by the MRI Scanner. The installation consists of unloading, handling, transfer, elevation and welding of steel plates, beams and columns.

The magnetic shielding plates will be transferred to the jobsite via a freight forwarder. Jobsite access will determine if a forklift, pallet jack or handcarts will be used to transfer the material to the work area. Support columns are anchored into the concrete slab and welded to support beams to create a self-supporting structure. The erection of this structure will generally require use of a forklift or approved portable load lift. Wall and ceiling plates will be lifted into place using either a forklift or other lift device, and welded to the support structure according to the approved design drawings. All welding will be performed by certified welders.

Installation of M36 Magnetic Shield (if applicable)

This work includes the placement of steel plates to further shield the surrounding areas from the 5 Gauss line produced by the MRI Scanner. The installation consists of unloading, handling, transfer, elevation and mechanically fastening lightweight steel plates.

The magnetic shielding plates will be transferred to the jobsite via a freight forwarder. Jobsite access will determine if a forklift, pallet jack or handcarts will be used to transfer the material to the work area. For the wall system, telescoping channels will be anchored into the slab using concrete expansion anchors. The tops of the channels will be attached to bracing designed to withstand the pull force of the MRI acting on the magnetic shielding. For the ceiling system a combination of support techniques will be used to suspend the shielding below the ceiling deck system. These techniques will rely on the existing structure to support the steel and will not be self-supporting. The magnetic steel will be hoisted into place using an approved portable load lift similar to a “Genie Lift”. Material will be secured into place using a pre-fabricated mechanical fastener system utilizing nuts and bolts.

Installation of copper RF Shield (if applicable)

The RF Shielding system is the heart of the package providing critical shielding from radio-frequency interference that is necessary to enable the customer-provided MRI system to perform properly.

The RF shielding package will be transferred to the jobsite via a freight forwarder. Jobsite access will determine if a pallet jack or handcarts will be used to transfer the material to the work area. The RF Shielding is comprised primarily of copper and other non-ferrous materials. It includes wall, floor, ceiling, door and frame system, window system and all appropriate filters and waveguides to enable penetrations of vital services and media into the shielded room. Sections of the copper shield are soldered and /or mechanically fastened to form a continuous surface. In addition to the copper panels, IMEDCO will provide subflooring materials, and wall preparations ready for finish wall surfaces.

Installation of aluminum RF Shield (if applicable)

The RF shielding package will be transferred to the jobsite via a freight forwarder. Jobsite access will determine if a pallet jack or handcarts will be used to transfer the material to the work area.

Some RF Shielding is compromised primarily of aluminum materials. It includes wall, floor, ceiling, door and frame system, window system and all appropriate filters and waveguides to enable penetrations of vital services and media into the shielded room. All aluminum panels are bolted together using mechanical fasteners to form a continuous surface. In addition to the aluminum panels, IMEDCO will provide sub-flooring materials, and wall preparations ready for finish wall surfaces, and in some cases IMEDCO will provide a finished interior ceiling capable of providing a secondary RF barrier.

Installation of the Acoustic Shield (if applicable)

The Acoustic Shielding system is comprised of various materials (rock wool insulation, engineered air-gaps, and various non-ferrous composites) that are mechanically fastened to and within the shield walls and ceiling and also fastened to the surrounding parent walls.

Installation of Interior Finishes (if applicable)

Finally the Interior finish surface will be installed on surrounding walls, the partial ceiling and selected exterior surface as agreed to by the customer. IMEDCO also installs a electrostatic dissipative Vinyl tile.

Job Hazard Analysis:

Each phase of this shielding package is unique.

The magnetic shield installation involves Health and Safety consideration of, but not limited to, the loss of handling control of the large heavy steel plates. Such loss of control could cause serious personnel injury and damage to the surrounding property.

In addition to understanding the science of RF, magnetic fields, acoustics and basic physics, the IMEDCO installers also must posses general carpenter skills. The hazards they encounter that are product related are limited to use hand-power tools, application of certain water-soluble adhesives, lifting heavy or bulky items and soldering (electric-powered soldering iron and flux).

The height of this complete shield is well above 6' and will require extra attention as the men work from various scaffolding and ladders.

IMEDCO's job hazard analysis will undergo review every six months. All changes will be documented following approval by management.

Designated On-site Representative:

There will be one individual involved identified as the IMEDCO or approved subcontractor site superintendent at all times. This individual may be different for magnetic and RF phases of installation. The IMEDCO and approved subcontractor site superintendent is trained according to IMEDCO corporate safety policies. His roles are outlined in more detail in section "F"

Other:

All MSDS sheets for critical products are attached. In addition, copies are also located in the on-site toolbox.

Jobsite Inspection: Responsibility of IMEDCO Site Superintendent. Safety course completed.

Discipline Policy: Responsibility of IMEDCO Site Superintendent

Post Accident Drug Testing: Responsibility of IMEDCO Site Superintendent

Safety Certification Training Policy: Responsibility of IMEDCO Safety Director

Equipment Safety Certification from 3rd party to be secured by all rental equipment suppliers.

Working in Hospital or Surgery Center:

State Health Department requirements for hospitals or surgery centers may require some or all of the following items:

1. epoxy wall coatings
2. positive air pressure systems
3. fire walls from floor to deck separating sterile areas
4. fire and smoke dampers
5. emergency generators
6. electrostatic air filters

IMEDCO will comply with General Contractor's requirements to prepare the construction area and maintain a suitable working environment.

Clean up of floors and other surfaces where dust accumulates shall, whenever possible, be cleaned by vacuuming or other methods that minimizes the likelihood of dust becoming more airborne.

Shoveling, dry or wet sweeping and brushing may be used only where vacuuming has been tried and

found not to be effective. Wet clean up is preferred to keep dust from becoming airborne when vacuuming is not successful.

Where vacuuming methods are selected, the vacuum must be equipped with a filter, and used and emptied in a manner that minimizes the reentry of dust into the workplace.

Compressed air shall not be used to remove dust from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the airborne dust created by the compressed air.

MRI SAFETY GUIDELINES:

The FDA requires the customer to establish a security zone and suitable screening procedures. Such measures are necessary to prevent the accidental introduction of people at risk or ferromagnetic objects near the magnet.

EXCLUSION ZONE
In accordance with FDA instructions, the customer must also establish an exclusion zone, including a restriction sign, to prevent the entry of anyone who is wearing a cardiac pacemaker or other active implants into areas where the field exceeds the 5-gauss exclusion zone. This is shown in the illustrations of the magnetic field map and in the floor plan. The zone is three-dimensional and extends not only to rooms within the imaging suite, but also into areas on floors above and below the imaging suite.

PATIENT SUPPORT ROOM
If available, this room (near the scan room) provides a private area in which to isolate a patient under stress.

CAUTION

Crash cart equipment or other emergency equipment containing ferromagnetic materials must not be brought into the scan room. The patient must be removed from the scan room on a nonmagnetic gurney (that is, one made of plastic, wood, or aluminum). Further information on nonferrous items can be obtained from the Manufacture's Site Development Department.

FIRE PROTECTION
No additional fire protection system, beyond what is normally specified by local codes, is required for safe operation of the imager. A water sprinkler system must not be used in the equipment room unless it is required by local codes.

CAUTION

Fire extinguishers made of ferrous materials must not be allowed in the scan room. If the building code requires the use of a sprinkler system, only a dry pipe sprinkler system can be used and only brass and copper components can be used in the scan room. Also, all sprinkler drops that penetrate the scan room ceiling must be electrically detached from the main sprinkler pipe by a nonconductive sleeve.

The superintendent shall implement and enforce the safety requirements set forth by “The Company” and the manufactures of the equipment.

No ferromagnetic ladders, tools, paint cans, or any other equipment will enter the imaging suite once the magnet has been activated.

No metal shall pass in front of the magnet core while it is exposed for service.

It can be fatal to yourself or other employees if these rules are broken. The strength of a MRI is 50,000 times stronger than the earth's magnetic field and it will pull a metal object out of your hands and into the magnet core in a second. If a person is between you and the Magnet, they will be injured. There will also be damage to the magnet in the millions of dollars.

PLEASE TAKE CAUTION WHILE WORKING AROUND A MRI!!!

SECTION B - CORPORATE STATEMENT OF SAFETY POLICY

This safety and loss prevention program was established in order to exercise all available means of eliminating or controlling hazards and risk associated with the construction industry. The primary objective of this program is the protection of IMEDCO personnel and others from personal injury. Important secondary objectives are:

1. Protection of jobsite property from damage.
2. Maintenance of conditions that assure the smooth and uninterrupted operation of the project.
3. Complete, accurate and prompt reporting of accidents.

IMEDCO is responsible for ensuring that all construction work on the project is performed in a safe manner and in conformity with all applicable safety and health regulations and standards. It follows then, that all IMEDCO project personnel have a definite obligation to their co-workers, and to the public, for carrying out the procedure as outlined in this Safety and Loss Prevention Program. Conscientious observance of safety responsibilities and procedures is expected of all job site personnel; willful or careless neglect of such responsibilities is a case for suspension or termination of employment.

Little is said here about employee attitudes, which play a great part in safety. If the regulations contained herein are followed, the fundamentals of a good safety program will have been met and good attitudes will be one of the many fringe benefits.

Time and money are important to a contractor, but the real tragedy of an industrial accident is the victim who all too often suffers loss of health, income, earning power and self-esteem. His family also shares this suffering.

Signature: 

Matt Krachon - Corporate Director

Date: Jan 1st, 2018

SECTION C - PROGRAM OBJECTIVES

The objectives of the IMEDCO Safety Program are:

1. To minimize personal injury, property, and damage.
2. Achieve greater efficiency.
3. Reduce direct and indirect cost.
4. Management recognizes that the extent to which these objectives are met will depend upon the complete support and corporation of IMEDCO, Lead Technicians, and construction personnel in carrying out the following basic procedures:
    A) Plan all work with detail to safety; minimize personal injury, property damage and loss of productive time.
    B) Implement a system of prompt detection and correction of unsafe practices and conditions.
    C) Maintain an effective system of tool and equipment inspection and maintenance.
    D) Establish and conduct an education program to stimulate and maintain interest and cooperation of all employees through:
        i. Safety Meetings
        ii. Prompt investigation of all accidents to determine cause to take necessary corrective action.
        iii. Enforcing use of personal protective equipment and mechanical guards.
        iv. Use of posters, pamphlets, and other similar material.

We require all IMEDCO employees and subcontractors to comply with Federal and applicable State OSHA standards.

SECTION D – IMEDCO SAFETY POLICIES

Fall Protection Policy:

For all work surface over 6' IMEDCO and approved subcontractors will be using a variety of equipment. For these instances, involving both the magnetic shield and the RF shield, we will follow OSHA approved safety guidelines for ladders, scaffolding and lift equipment. The Installation Manager will ensure that all employees are properly trained to use portable ladders to help to avoid injuries. Employees will receive training as necessary by the manager.

PROCEDURE

LADDERS

1. Before using ladders, they must be properly inspected and secured.
2. Folding stepladders shall only be used in the open and locked position.
3. The employee is responsible for reporting any defects to the installation manager immediately.
4. Aluminum ladders shall not be used in or around electrical equipment or wires.
5. Aluminum ladders shall not be used in or around electrical equipment or wires.
6. Never paint over a ladder. Never remove the safety instructions on ladders.

SCAFFOLDING (if applicable)

7. All scaffolds or work platforms must be provided with guardrails or safety belts to protect you from falling from elevated work areas.
8. Scaffold planks will be tested and secured to prevent movement.
9. All scaffolding should be constructed of steel, aluminum, or treated lumber.
10. Scaffold must be erected, moved, or disassembled only under the supervision of qualified persons. Hard hats must be worn by all persons erecting, moving, dismantling or using scaffolding.
11. Access must be provided to all work platforms. If it is not available from the structure, access ladders, frames with built-in ladders, or stairways must be provided. When frames with built-in ladders are used, cleated plank or fabricated plank must be used at platform levels to minimize or eliminate platform overhang. Access ladders must extend at least three (3) feet above platforms.
12. Employees must follow scaffolding guidelines for specific capacity and load requirements.
13. Check the erected assembly before use. A qualified person should thoroughly inspect the completed assembly to see that is complies with all safety codes, that nuts and bolts are tightened, that it is level and plumb, that work platforms are fully planked, that guardrails are in place and safe access is provided.
14. Keep all tools and materials away from the edge of scaffolds, work platforms, and floor openings to prevent them from being knocked off on employees below.

MAN-LIFT/SCISSOR-LIFT (if applicable)

15. Prior to use of Man-lift or Scissor-lift, operator will undergo training on proper usage.
16. Operator will follow manufacturers operating procedures for use of manlift or scissor lift.
17. Equipment will be inspected before each day of use, following manufacturers' specifications.

Hot Work Policy:

There will be Hot Work required for various periods throughout both the Magnetic (if applicable) and RF installation phases of this project. Welding may be necessary dependant upon the type of magnetic shielding required. Electric soldering irons will be used during the RF installation. IMEDCO will submit for Hot Work Permits if required by job policy and will have approved fire extinguishers for a backup throughout.

This procedure shall be used before any welding, cutting or preheating is performed around or above combustible or flammable materials including, but not limited to wood, paper, cardboard, paint, oil, gas, conveyor belts, electrical equipment or cable trays. When possible, the objects to be welded, cut or preheated shall be moved to a safe location. If not practical, all movable fire hazards will be moved to a safe place or positive means shall be taken to protect them from heat, slag or sparks. If protection is required, the form found in **Appendix E** must be filled out and posted at entry of space. A copy should be kept in IMEDCO files.

PROCEDURE

1. This permit is valid for one week and pertains only to the location listed.
2. Permit must remain posted and a log of said permits retained in the site office.
3. Permit shall be removed at completion of work or when validation date is exceeded.
4. Foreman will check and sign forms each day at the start of the shift to ensure the area is safe for burning, welding, or preheating.

Personal Protective Equipment Policy:

All IMEDCO employees must be training regarding the use of this Personal Protective Equipment. This training will be conducted at the time of New Hire Orientation, and will be renewed once yearly. All training activities will be recorded.

1. Personal protective equipment such as hard hats, safety glasses, and face shields, etc. shall be worn as prescribed by each job.

All IMEDCO employees are responsible to provide and maintain the following Personal Protective Devices inspected and approved by the Safety Director:

2. Hard Hat
3. Steel-Toe Reinforced Boots
4. Safety Glasses
5. Hearing protection

IMEDCO will make available the following protective devices when applicable

6. Ventilation masks – Dust masks will be provided if the employee feels it is necessary to utilize one. This will be at the employee's discretion. IMEDCO does not require employees to wear dust masks.
7. Welding eye protection and gloves

Respiratory Device Policy:

1. No respiratory device is required during the RF shield installation. Materials used during the RF installation do not require the use of such devices. Refer to MSDS PPE requirements.

Substance Abuse Policy:

IMEDCO is committed to providing a drug free environment. Not only can the use and/or abuse of drugs and alcohol jeopardize the health, safety and well-being of the individual user and other co-workers, but it also results in absenteeism and productivity concerns, higher workers' compensation costs and health/disability premiums, and endangers the safety of other workers at the jobsite and the general public.

Since our employees are our most valuable resources, and the safety of our employees and the public are important to us, we have developed and published a substance abuse policy to help us contribute to the solution of this very difficult health and social problem. Our policy is intended to accurately detect and deter the use and abuse of drugs and alcohol in our workplace, while respecting the dignity and privacy of all of our employees.

Although this Company is not required to comply with the Drug Free Workplace Act of 1988, or the drug testing guidelines published by the U.S. Department of Health and Human Services and/or the U.S. Department of Transportation, our policy takes into account those requirements. Those provisions establish reasonable bases to ensure that the legitimate needs of the employees are balanced properly against the Company's concerns of protecting the workplace and our employees.

Therefore, it is the policy of the Company that the possession, sale or use of illegal drugs is not consistent with the Company's needs to operate in a safe and efficient fashion. For that reason, no employee of the company may use or posses unlawful drugs, i.e., any substance found on the list of controlled substances issued by the Food and Drug Administration now or in the future, at any time. This policy also prohibits employees from such use that impairs his/her performance of work on the job, as well as prohibiting use while on Company business at any time, whether on the property or off. In addition, while this Company has no desire to intrude upon the private activities of its employees when they are away from Company property and not on Company time, involvement with unlawful drugs,

including their manufacture or distribution, constitutes a severe breach of accepted conduct and is also prohibited.

In order to ensure this policy is followed, all on site employees and subcontractors of IMEDCO are required to be registered in the MICCS substance abuse data base and have a valid MICCS card

Compressed Cylinder Handling/Storage Policy:

This Policy applies to the IMEDCO factory and any job site where IMEDCO employees or subcontractors use compressed gas cylinders.

Serious fire, explosion or rupture accidents may result from the misuse or mishandling of compressed gas cylinders. Observance of the following rules will help control this risk.

1. Cylinders must be clearly labeled, with information indicating date of delivery.
2. Cylinders shall be non-leaking with functioning valve or closure cap.
3. Do not store cylinders near to:
   i) Flammable substances
   ii) Corrosive chemicals
   iii) Elevator shafts or stairways
   iv) Emergency exits
4. All oxygen and gas cylinders, full or empty, shall be stored, transported and used on an upright position, tied-off.
5. Prior to moving a cylinder, make certain that the safety valve is closed and the protection cap is replaced
6. Cylinders shall be moved by hand cart, or rolled on the bottom edge, at no time can a cylinder be dragged, or lifted by the valve cap.
7. Do not use oxygen or compressors to blow dust or dirt from your clothes, hair, face or hands.
8. Oxygen cylinders will be separated from fuel gas cylinders by 20'

Electrical Safety Policy:

IMEDCO does not employ licensed electricians, and does not perform electrical wiring, but our responsibilities do include certain low-voltage applications and installing provisions for electrical grounding systems. Thus, electrical PPE is not required by IMEDCO. Observance of the following rules will minimize the risk of electric shock.

1. Keep clear of all electrical gear and wiring - contact a qualified electrician.
2. All electrical cords will be of the three-wire type with ground prong attached. All electric tools will be grounded or of the double insulated type.
3. Electrical extension cords will be inspected weekly to ensure that no cords are damaged or cut.
4. All power tools will have grounding provisions, and electrical cords will be inspected to ensure that no cords are damaged or cut.
5. All electrical cords used during installation will be plugged into an approved GFCI.

Forklift Safety Policy:

Training

Training for Powered Industrial Truck (PIT) Operators shall be conducted by a certified instructor. All operational training shall be conducted under close supervision. All training and evaluation must be completed before an operator is permitted to use a powered industrial truck

Training consists of a combination of formal instruction, practical training exercises and evaluation of the operator's performance in the workplace.

Refresher training shall be provided to the operator when:

1. The operator has been observed to operate the vehicle in an unsafe manner.
2. The operator has been involved in an accident or near-miss incident.
3. The operator has received an evaluation that reveals that the operator is not operating the truck safely.
4. The operator is assigned to drive a different type of truck.
5. A condition in the workplace changes in a manner that could affect the safe operation of the

truck.
6. Refresher training will be conducted every three years.

Operator and Vehicle Information

7. Only authorized and trained personnel will operate forklifts.
8. All forklifts will be equipped with an overhead carriage, fire extinguisher, rotating beacon, face plate, horn, and back-up alarm.
9. The operator will perform daily pre-inspections.
10. Any safety defects (such as hydraulic fluid leaks, defective brakes, defective steering, missing face plate, non-working horn, missing fire extinguisher, etc.) will be reported for immediate repair or have the forklift taken out of service.
11. Operators will follow the proper recharging or refueling safety procedures.
12. Loads will be tilted back and carried no more than 6 inches from the ground. Loads that restrict the operator's vision will be transported backwards.
13. Operator will sound horn and use extreme caution when meeting pedestrians, making turns and cornering.
14. Passengers may not ride on any portion of a PIT. Only the operator will ride forklifts.
15. If forklifts are used as a man lift, an appropriate man lift platform (cage with standard rails and toe-boards) will be used. Aisle will be maintained free from obstructions, marked and wide enough (six foot minimum) for vehicle operation.
16. Lift capacity will be marked on all forklifts. Operator will assure load does not exceed rated limits.
17. When unattended, forklifts will be turned off, forks lowered to the ground, parking brake applied and key removed
18. Operators are instructed to report all accidents, regardless of fault and severity to the Department of Safety and Environmental Compliance.

Operations

19. If at any time a powered industrial truck is found to be in need of repair, defective, or in any way unsafe, the truck shall be taken out of service until it has been restored to safe operating condition. Truck will be tagged to identify safety issue and point of contact for repairs.
20. Trucks shall not be driven up to anyone standing in front of a bench or other fixed object.
21. No person shall be allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.
22. Unauthorized personnel shall not be permitted to ride on powered industrial trucks.
23. Arms or legs shall not be placed between the uprights of the mast or outside the running lines of the truck.
24. When a powered industrial truck is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, brakes set and keys removed. Wheels shall be blocked if the truck is parked on an incline.
25. A safe distance shall be maintained from the edge of the ramps or platforms while on any elevated dock, or platform or freight car. Trucks shall not be used for opening or closing freight doors.
26. There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
27. An overhead guard shall be used as protection against falling objects. It should be noted than an overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling capacity load.
28. A load backrest extension shall be used whenever necessary to minimize the possibility of the load or part of it from falling rearward.
29. Trucks shall not be parked so as to block fire aisles, access to stairways or fire equipment.

Fire Prevention Policy:

1. Know where fire protection equipment is located and learn how to use it. Never cover or block any type of fire fighting equipment.
2. Make sure all flammable liquids, such as alcohol, are stored in approved and appropriately labeled safety cans and are not exposed to any ignition source.
3. In Case of Fire you should:
   i) Dial 911 or the local fire department.

ii) If possible, immediately evacuate all employees from the area.
iii) If the fire is small and contained, locate the nearest fire extinguisher. Employees who are knowledgeable in the correct use of fire extinguishers should only attempt this.
iv) If the fire is out of control, leave the area immediately. No attempt should be made to fight the fire.
v) When the fire department arrives, direct the crew to the fire. Do not re-enter the building until directed to do so by the fire department.

4. All IMEDCO America tool boxes are furnished with fire extinguishers.
   i) All extinguishers are inspected before each job installation by the lead installer.
   ii) Any extinguisher deemed unusable is taken out of service and replaced with a new one.
   iii) Installation manager is responsible for replacing fire extinguisher.

Hand Tool / Power Tool Safety Policy:

1. Be sure all equipment guards are in place and do not remove unless you are instructed to do so.
2. Tools shall be inspected at regular intervals and shall be repaired in accordance with the manufacturers' specification
3. Before using a tool, the operator shall inspect it to determine that all operating moving parts operate and that it is clean.
4. Power tools shall be maintained in accordance with the manufacturers' specifications.
5. All power tools are to be double insulated or properly grounded in accordance with manufacturers' specifications.

Welding and Cutting Policy:

It is IMEDCO's policy that any employee or subcontractor engaged in the act of welding will be certified before performing any work. This certification process will insure that employees are trained in the safe use of welding equipment and fuel gas.

Welding

1. All welding, cutting, painting or any work where materials or scraps can drop to the next elevation will be protected with welding blankets, drop covers, plywood or other means used to correct the situation.
2. Leaky hoses on welding equipment should never be used or taped.
3. IMEDCO will use only proper grounding, cables, splices and connectors for arc welding equipment
4. PPE will be used for all welding tasks

Soldering

5. Never touch the element or tip of the soldering iron.
6. Take great care to avoid touching the mains flex with the tip of the iron.
7. Always return the soldering iron to its stand when not in use.
8. Work in a well-ventilated area.
9. Wash your hands after using solder.

Disciplinary Policy:

Violations of IMEDCO Safety Policy will result in disciplinary action, to be determined by Safety Director in conjunction with the Director of Operations

Any disciplinary activity will be noted in personnel file.

Housekeeping:

A basic concept in any effective prevention endeavor is good housekeeping. Construction is no exception. No one item has a greater impact on the overall success of a safety program for a construction project. The importance of good housekeeping must be planned for at the beginning through the final clean up. The degree of attention given to housekeeping will normally be reflected in the accident record as well as the installation efficiency.

General Provisions

This section details the provisions of this safety requirement and procedure with each

provision discussed in a separate subsection. These provisions are:

• Training
• Construction Scrap and Debris
• Construction Waste Disposal

Training
Employees will be trained to work safely on construction sites by following good housekeeping practices. Employees will be trained at time of initial employment or assignment. Employees will be trained in:

• The importance of housekeeping
• The benefits of housekeeping

Construction Scrap and Debris
Scrap material and debris generated during construction usually consist of:

• Non-combustible scrap material and debris
• Combustible scrap material and debris

Non-combustible scrap material and debris that consist of form and scrap lumber with protruding nails, and all other debris, must be kept cleared from work areas, passageways, and stairs, and from around buildings or other structures.

Nails should be removed from used lumber before stacking. Combustible scrap and debris must be removed at regular intervals during the course of construction without increasing the hazard exposure to employees who remove such debris. See 29 CFR 1926.141, Sanitation, for related information on construction sites.

Housekeeping Rules

1. The essential elements of good housekeeping are:
   i) Orderly placement of materials, tools and equipment.
   ii) Receptacles (dumpsters) will be placed around the site for collection of waste materials.
   iii) All hazardous waste or waste, which could be considered hazardous waste, as determined by the methodology and definitions from environmental regulators, will be stored and collected in special areas and disposed of as directed by the Supervisor.
   iv) No material is to be abandoned on the job site.
   v) Waste haulers, disposers, recyclers or scavengers will not be allowed on the job site without the permission of the Supervisor. Proper licenses or permits must be on file before they are allowed to perform any work.
   vi) Locating extension cords in positions that eliminate tripping hazards.
   vii) Do not allow scrap to accumulate – especially near equipment, trailers or supplies. Sweep up trash and debris from around equipment such as drill presses, lathes or planers by using a broom and a dustpan.
   viii) Clean-up all spilled liquids immediately to prevent the possibility of someone slipping or falling.
   ix) Stack materials and supplies in a safe manner and keep them out of walkways. Do not place debris such as boxes or trash in walkways and passageways. Keep pathways CLEAR.
   x) Never allow wires and cables to pass across places where people might walk. They can be a serious trip hazard. Electrical cords should be run through openings in doors, walls or ceilings. If there is no alternative route, ensure that a cable is covered by special rubber cable protectors designed for this purpose.
   xi) Multi-outlet strips should not be plugged into other multi-outlet strips.
   xii) Extension cords should not be plugged into other extension cords.
   xiii) Electrical devices should not show signs of overheating.
2. During the course of construction, work areas, passageways and stairs, in and around buildings and structures, shall be kept clear of debris. Construction materials shall be stored in an orderly manner.
3. Storage areas and walkways on the site shall be maintained free of dangerous depressions, obstructions and debris.

4. Adequate and sufficient lighting is a part of housekeeping.
5. Do not block or obstruct stairwells, exits or accesses to safety and emergency equipment such as fire extinguishers or fire alarms.
6. Keep ALL walking surfaces of elevated working platforms, such as scaffolds, clear of tools and materials that are not being used.
7. Remove protruding nails or bend them down into the lumber by using a claw hammer.
8. Return tools to their storage places after use.
9. Do not use gasoline for cleaning purposes. Dispose of oily rags in proper metal non-combustible containers.

Construction Waste Disposal
All construction waste must first be collected into containers before disposal. The categories of construction waste generated at a construction site include:

• General waste and trash (non-toxic, non-hazardous)
• Hazardous waste

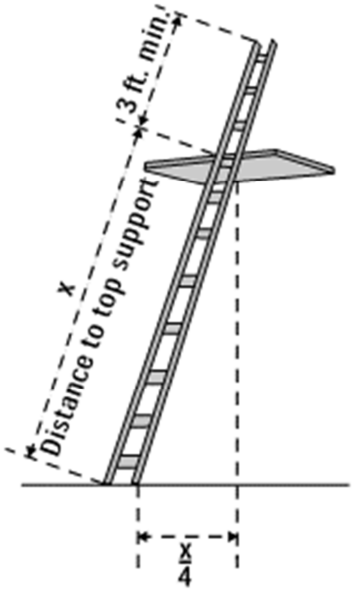
Separate containers must be provided for the collection and separation of waste, trash, and other refuse.

Additional separate containers must be provided with lids for hazardous wastes to prevent sparks or other ignition sources from coming into contact with hazardous waste. Hazardous waste can include used oil, used oil filters, oily rags and flammable wastes as well as caustics, acids, harmful dusts, etc.

Absorbent that is used to collect incidental used oil spills and oily rags can be disposed of in waste collection dumpsters. Used oil filters must be drained of oil before they can be disposed into separate waste containers.

Ladder Policy:

1. Read and follow the manufacturer's instructions label affixed to the ladder if you are unsure how to use the ladder.
2. Do not use ladders that have loose rungs, cracked or split side rails, missing rubber foot pads, or are otherwise visibly damaged.
3. Keep ladder rungs clean and free of grease. Remove buildup of material such as dirt or mud.
4. Allow only one person on the ladder at a time and do not move or shift a ladder while a person or equipment is on the ladder.
5. Do not use a self-supporting ladder (e.g., stepladder) as a single ladder or in a partially closed position.
6. Face the ladder when climbing up or down.
7. Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder always when climbing up or down.
8. When performing work from a ladder, face the ladder and do not lean backward or sideways from the ladder.
9. Do not stand on the top two rungs of any ladder.
10. Do not stand on a ladder that wobbles, or that leans to the left or right. Use a ladder only on a stable and level surface, unless it has been secured (top or bottom) to prevent displacement.
11. An extension or straight ladder used to access an elevated surface must extend at least 3 feet above the point of support. Do not stand on the three top rungs of a straight, single or extension ladder.
12. Do not move a rolling ladder while someone is on it.
13. Do not place ladders on barrels, boxes, loose bricks, pails, concrete blocks, or other unstable bases to obtain additional height.
14. Do not carry items in your hands while climbing up or down a ladder.
15. Do not try to "walk" a ladder by rocking it. Climb down the ladder, and then move it.
16. Do not use a ladder as a horizontal platform.



17. Avoid electrical hazards! Look for overhead power lines before handling a ladder. Avoid using a metal ladder near power lines or exposed energized electrical equipment.
18. A ladder placed in any location where other work activities could displace it must be secured to prevent displacement or a barricade must be erected to keep traffic away from the ladder.
19. Be sure that all locks on an extension ladder are properly engaged.
20. Do not exceed the maximum load rating of a ladder. Be aware of the ladder's load rating and of the weight it is supporting, including the weight of any tools or equipment.
21. The proper angle for setting up a ladder is to place its base a quarter of the working length of the ladder from the wall or other vertical surface (see diagram).

Confined Spaces Policy:

Purpose

The purpose of the Confined Space Program is to increase the safety of IMEDCO America employees and onsite contractor(s) by establishing appropriate procedures for identifying, classifying and managing confined spaces in IMEDCO America operations and facilities.

Scope

The objective of this program is to protect personnel from injury upon entry into a confined space. Work will not begin in a confined space until the potential hazards have been identified, eliminated or minimized, and a proper classification of the space has been made. Employees will not enter a confined space until the requirements of this written program, have been implemented.

All employees are required to follow the procedures outlined in this program. Any deviations from this program must be immediately brought to the attention of the Program Administrator. This program will apply to all IMEDCO America employees and onsite contractor(s) during maintenance, repair, cleaning, construction or other activities that take place in the confined space(s).

Program Responsibilities

Management. IMEDCO America is committed to the safety of employees as it pertains to working in or near confined spaces, and management supports the efforts of the Confined Space Program Administrator by pledging financial and leadership support for the identification and control of confined space risk factors. Management is responsible for:

Consulting with affected employees on the development and implementation of all aspects of the confined space program

Providing affected employees all information contained within the confined space program

Program Administrator/Qualified Person. The program administrator/qualified person is responsible for the following:

Conducting an initial survey of both the premises and operations to identify confined spaces

Establishing a process to identify the addition or deletion of confined spaces

1. Maintaining a current inventory of confined spaces
2. Evaluating each confined space to classify the spaces as permit-required or non-permit required
3. Informing exposed employees of the existence, location and danger posed by the permit-required confined space by posting danger signs.
4. Conducting confined space air monitoring are maintaining related records
5. Reviewing cancelled entry permits for opportunities for continuous improvement
6. Preventing IMEDCO America employees and onsite contractors from entering permit-required confined spaces that are not approved for entry
7. Maintaining the rescue plan for all confined spaces
8. Arranging for rescue team simulations in all permit required spaces annually
9. Reviewing the Confined Space Program at least annually, or more often if needed, to determine if changes are needed due to added processes, equipment or recently introduced hazards
10. Conducting, documenting and assessing the effectiveness of employee training

Entry Supervisor/Leader. Entry Supervisors/Leaders are responsible for the following:

11. Conducting an initial external visual inspection of the confined space entry point when possible
12. Knowing the requirements of the Confined Space Program, including how to properly implement the duties of the Entrants, Attendants and Rescue Personnel
13. Completing entry permits
14. Determining entrance requirements
15. Posting the permit in a conspicuous location near the entry point
16. Determining the number of Attendants required for safe completion of the work
17. Verifying that rescue services are available prior to and throughout the entry and that the means for summoning them are operable
18. Verifying that all required preliminary actions have been taken prior to endorsing the permit and authorizing entry to begin
19. Ensuring no additional responsibilities are given to the Attendant other than observing the Entrant(s) and their duties
20. Ensuring that acceptable conditions are maintained for the duration of the entry
21. Communicating the status and requirements of the entry to other Entry Supervisors/Leaders whenever the Entry Supervisor/Leader role is changed
22. Terminating entry, assuring removal of personnel and equipment and revoking or canceling the permit when required

Entry Team - Attendant. Attendants are responsible for the following:

23. Being stationed outside the point of entry/exit of the confined space to observe the permit-required confined space
24. Remaining at the entry point and maintaining two-way communication with the Entrant(s) during entry until relieved by another Attendant, or until the entry is completed or terminated by the Entry Supervisor or Leader
25. Maintaining a sign-in/sign-out log of all individuals entering the confined space
26. Providing standby assistance to Entrants entering the confined space
27. Directing Entrants to exit the confined space when any irregularities are observed
28. Initiating evacuation and emergency procedures
29. Monitoring for any conditions or changes that could adversely affect the entry
30. Preventing unauthorized entry

Entry Team - Entrant. Entrants are responsible for the following:

31. Reading and obeying entry permit requirements
32. Maintaining two-way communication with the Attendant
33. Recognizing potential hazards that may be encountered during the entry
34. Understanding the proper use and limitations of equipment for controlling these hazards
35. Inspecting for hazards not identified by atmospheric monitoring during entry activities
36. Responding to emergencies, including implementing methods for self-rescue or evacuation
37. Recognizing symptoms and warning signs of exposure to potential hazards or prohibited conditions
38. Notifying the Attendant of any symptoms of exposure, emergency or unacceptable condition in the confined space
39. Exiting the confined space immediately if symptoms, warning signs or unacceptable conditions occur or if directed by the Attendant or Entry Supervisor/Leader
40. Inspecting for hazards during entry activities

Identification of Hazards and Evaluation of Confined Spaces

Survey. The Program Administrator will conduct a survey of the property and all other worksites IMEDCO America employees are working at and identify confined spaces. The surveys will be completed from site observations, building blueprints and job hazard analyses, and will include air monitoring to determine the air quality in the confined spaces and identification of hazards.

Inventory. An inventory of the locations or equipment that meets the definition of a confined space is located in **Appendix C** of this program. The potential for engulfment, entrapment, hazardous energy, atmospheres with flammable or explosive potential, oxygen deficiency, and/or the presence of toxic and corrosive material and all other hazards will be documented. This information will also be

communicated to all personnel, and appropriate confined space procedures will be developed and followed prior to entry. The Program Administrator will determine, based on the identified hazards, which confined spaces will be entered and require a permit prior to entry and which confined spaces will not be entered. Both determinations will be documented on the inventory.

Hazard Reevaluation. The Program Administrator will identify and reevaluate hazards at least annually, or sooner based on changes in activities or other physical or environmental conditions that could adversely affect work. Any change in designation of a confined space will be routed to all affected personnel by the Program Administrator.

Hazard Controls. When personnel will be required to enter confined spaces, IMEDCO America will utilize hierarchy of hazard control techniques to first eliminate and then, if they cannot be eliminated, reduce hazards of confined spaces. The following order of precedence will be followed when eliminating or reducing confined space hazards:

- Engineering Controls: These are controls that eliminate or reduce the hazard through implementation of approved engineering practices.

- Administrative Controls: These are controls which eliminate or reduce the hazard through changes in work practices including, but not limited to, rotating workers, reducing the amount of worker exposure and housekeeping.

- Personal Protective Equipment (PPE): If the hazard cannot be eliminated or reduced to a safe level through engineering and/or administrative controls, PPE will be used. The Program Administrator will determine the appropriate PPE needed by all personnel entering the confined space, including rescue teams.

All confined spaces with identified hazards will have a written plan for mitigation of those hazards. The mitigation strategies will be documented on the Permit-Required Confined Space Hazard Mitigation form located in **Appendix H**. The following list outlines hazard categories and example mitigation strategies:

- Atmospheric Hazards: Purging, inerting, flushing or ventilating
- External Hazards: Barricading from pedestrian and vehicle traffic
- Internal Hazards: PPE, communication, lighting, barriers, shields, ladders, rescue equipment

Permit-Required Confined Space Labeling and Security
Each permit-required confined space shall have one of the following signs on or near the entrance(s) that identifies the space as a permit-required confined space. The specific signage will be determined by the Program Administrator based on the identified hazards that exist within the confined space. Signs will be maintained in a legible condition.

All permit-required confined spaces will be secured from entry with an appropriate locking device supplied by the Program Administrator, or with mechanical fasteners authorized by the Program Administrator, which limit casual entry.

Reclassifying Permit-required Spaces
The Program Administrator is the only company representative authorized to reclassify a permit-required confined space to a non-permit confined space. Spaces may only qualify for reclassification if they do not contain, or could not potentially contain, atmospheric hazards (as per the inventory and by testing on the day of the reclassification attempt).

To reclassify a space, the Program Administrator must determine and document that all non-atmospheric hazards are eliminated without entry into the space. All reclassifications will be documented on the form located in **Appendix G**. All fields within the form shall be completed and a copy of the completed form will be supplied to all employees entering or to their authorized representative.

If a previously identified and eliminated hazard or a new hazard becomes apparent or active in a reclassified space, all employees shall immediately exit the space and the space will revert to a permit-required confined space.

Entry Permits
A permit-required confined space entry permit process will be used to guide Entry Supervisors, Attendants and Entrants through a systematic evaluation of the permit-required confined space to be entered, and to establish appropriate entry conditions. Before each entry into a permit-required confined space, an entry permit will be completed by the Entry Supervisor. The Entry Supervisor will then communicate the contents of the permit to all employees involved in the operation, and post the permit conspicuously near the work location. A standard entry permit, located in **Appendix E,** will be used for all entries.

Permit Scope and Duration. A permit is only valid for one shift. For a permit to be renewed, the following conditions must be met before each reentry into the confined space:

- Atmospheric testing will be conducted and the results will be within acceptable limits. If atmospheric test results are not within acceptable limits, effective mitigation precautions to protect Entrants against the atmospheric hazards will be addressed on the permit, be operational and will mitigate the hazard to a level safe for entrance.

- The Program Administrator will verify that all mitigation precautions and other measures called for on the permit are still in effect and providing protection for the Entrants.

- Only operations or work *originally* approved on the *original* permit will be conducted in the confined space.

A new permit will be issued, or the original permit will be reissued if possible, whenever changing work conditions or work activities introduce new hazards into the confined space.

The Program Administrator will retain each canceled entry permit for at least two years to facilitate the review of the Confined Space Entry Program. Any problems encountered during an entry operation will be noted on the respective permit(s) so that appropriate revisions to the Program can be made.

Entry Procedures
Pre-Entry Hazard Assessment. A hazard assessment will be completed by the Program Administrator prior to any entry into a confined space. The hazard assessment should identify:
- The sequence of work to be performed in the confined space
- The specific hazards known or anticipated
- The control measures to be implemented to eliminate or reduce each of the hazards to an acceptable level

No entry will be permitted until the hazard assessment has been reviewed and discussed by all persons engaged in the activity. Personnel who are to enter the permit-required confined space will be informed of known or potential hazards associated with it.

When entry into a confined space is necessary, either the Entry Supervisor or Program Administrator may initiate entry procedures, including—when necessary—the completion of a permit-required confined space entry permit. Entry into a confined space will follow the standard entry procedure below.
Permit-Required Standard Entry. The confined space entry permit will be completed in its entirety before any entry. Entry will be allowed only when all requirements of the permit are met and the permit has been reviewed and signed by the Entry Supervisor. The following conditions must be met prior to a standard entry:

- Affected personnel will be proficient in the duties that will be performed within the confined space.
- The internal atmosphere within the confined space will be tested by the Program Administrator with a calibrated, direct-reading instrument.
- Personnel will be provided with necessary PPE as determined by the Entry Supervisor.
- Atmospheric monitoring will take place during the entry. If a hazardous atmosphere is detected during entry:
    - Personnel within the confined space will be evacuated by the Attendant(s) or Entry Supervisor until the space can be evaluated by the Program Administrator to determine how the hazardous atmosphere developed.
    - Controls will be put in place to protect employees before reentry.
- Confined space hazards will be isolated from the space. Isolation is the protection against the release of active or stored energy and/or material into the space. Isolation will be achieved by the appropriate means as determined by the Program Administrator. Options will include:
    - Blanking or blinding
    - Misaligning or removing sections of lines, pipes or ducts
    - A double block and bleed system
    - Lockout or tagout of all sources of energy
    - Blocking or disconnecting all mechanical linkages

If isolation of the space is infeasible pre-entry, testing will be performed to the extent feasible before entry is authorized. If entry is authorized, entry conditions will be continuously monitored in the areas where authorized Entrants are working.

Opening a Confined Space. Any conditions making it unsafe to remove an entrance cover will be eliminated before the cover is removed. When entrance covers are removed, the opening will be promptly guarded by a railing, temporary cover or other temporary barrier that will prevent anyone from falling through or entering the opening. This barrier or cover will also protect each employee working in the space from foreign objects entering the space. If the opening is in an area with street or pedestrian traffic, barriers capable of diverting or deflecting such traffic will be erected.

IMEDCO America will implement necessary measures to prevent unauthorized entry into open confined spaces and will immediately take the following actions when unauthorized persons approach or enter a permit-required space while entry is underway:

1. Warn the unauthorized persons that they must stay away from the permit space
2. Advise the unauthorized persons that they must exit immediately if they have entered the permit space
3. Inform the authorized Entrant(s) and the Entry Supervisor(s) if unauthorized persons have entered the permit space

Atmospheric Testing. Before entry into a permit-required confined space, the Program Administrator will conduct testing for hazardous atmospheres. Atmospheric test data is required and will be done initially, with all existing ventilation systems shut down. Atmospheric testing is required for two distinct purposes:

1. Evaluation of the hazards of the space
2. Verification that acceptable conditions exist for entry into that space

The internal atmosphere will be tested with a calibrated, direct-reading instrument for oxygen, flammable gases and vapors, and potential toxic air contaminants—in that order. The monitor will be verified by a “bump” test prior to use. If a person must go into the space to obtain the needed data, then standard confined space entry procedures will be followed.

Only testing equipment approved by the Program Administrator will be used for confined space atmospheric testing. All testing equipment used at IMEDCO America will be approved by Underwriters Laboratories for use in hazardous atmospheres. All testing instruments will be provided by a professional that is brought in and confirmed to be recently calibrated. All testing deemed necessary will

be performed by a third party. The Program Administrator will maintain an instrument maintenance and recertification record.

Each authorized Entrant or employee's authorized representative will be provided with the results of all testing conducted upon request to the Program Administrator. Each authorized Entrant(s) or employee authorized representative will be provided with the opportunity to observe any monitoring or testing of confined spaces. Requests for reevaluation, based on an Entrant(s) or an Entrant's representative having reason to believe that the evaluation of that confined space may not have been adequate will be made to the Program Administrator. Reevaluations will be performed as soon as practical and any authorized Entrant(s) or employee's authorized representative will be given the opportunity to witness the testing.

Evaluation Testing. Initial results of testing for atmospheric hazards will be evaluated and interpreted by Program Administrator. In the absence of the Program Administrator, atmospheric testing will be evaluated and interpreted by a reputable third party local to the jobsite. Atmospheric testing evaluation and interpretation must be received prior to filling out the confined space entry permit or any entrance into a permit-required confined space.

Verification Testing. All confined spaces that have been identified as having, or possibly having, a hazardous atmosphere will be tested for residues of all identified or suspected contaminants. The evaluation testing will be conducted at the time of entry to determine if the hazards are within acceptable limits. Results of testing will be recorded by the Program Administrator. In the absence of the Program Administrator, atmospheric testing will be conducted by a reputable third party local to the jobsite During the time the permit-required confined space is occupied, the atmosphere will be periodically retested (frequency to be determined by Program Administrator based on the known hazard) to verify that atmospheric conditions remain within acceptable entry parameters.

Acceptable Limits. The atmosphere of a confined space will be considered to be within acceptable limits when the following conditions are met and maintained:

- Oxygen: 19.5 percent to 23.5 percent
- Flammability: below 10 percent of the Lower Flammable Limit (LFL) for gases, vapors, mists or combustible dusts
- Toxicity: below the permissible exposure limit (PEL)/threshold limit value (TLV) or time-weighted average (TWA) of a substance

Forced Air Ventilation. When conditions accommodate continuous forced air ventilation as a remedy for atmospheric conditions, the following precautions will be followed:

- Employees will not enter the space until the forced air ventilation has eliminated any hazardous atmosphere
- Forced air ventilation will be directed so as to ventilate the immediate areas where an employee is or will be present within the space
- Continuous ventilation will be maintained until all employees have left the space
- Air supply or forced air ventilation will originate from a clean source

If the confined space does not have acceptable entry conditions, entry IS NOT permitted.

Isolation and Lockout/Tagout Safeguards

All energy sources that are potentially hazardous to confined space Entrants will be secured, relieved, disconnected, and/or restrained before personnel are permitted to enter the confined space. Equipment systems or processes will be locked out and/or tagged out as required by the IMEDCO America Lockout/Tagout Program prior to permitting entry into the confined space. In confined spaces where complete energy isolation is not possible, the Program Administrator will evaluate the situation and make provisions to allow as much isolation as practical. Special precautions will be taken when entering double-walled, jacketed or internally-insulated confined spaces that may discharge hazardous material through the vessel's internal wall.

When there is a need to test, position or activate equipment by temporarily removing the lockout protections, all Entrants will be removed from the space prior to removal of the safety devices and activation of the systems. Any removal of locks, tags or other protective measures will be done in accordance with the IMEDCO America Lockout/Tagout Program.

Extraction/Retrieval Protocol
Each confined space will be evaluated by the Program Administrator to determine an extraction/retrieval protocol. This extraction/retrieval protocol will be documented on the form located in **Appendix I**. The written extraction/retrieval protocol will be kept onsite at the confined space location, and all affected personnel will be trained on the emergency response plan.

Emergency Response, Evacuation and Rescue
All individuals entering a permit-required confined space will wear a full-body harness, and the harness will be attached at all times to an appropriate extraction tool allowing the individuals to be retrieved from the confined space at any time without requiring other individuals to enter the confined space. No individual will enter a confined space where an extraction/retrieval protocol has not been established, or when the extraction equipment is not available and used.
If it is determined that extraction/retrieval systems will increase the overall risk of entry or the equipment would not contribute to the rescue of the Entrant, IMEDCO America employees will not enter the confined space. Full-body harnesses will have a retrieval line attached at the center of the back near shoulder level or above the head. If harnesses are not feasible or would create a greater hazard, IMEDCO America employees will not enter the confined space. The retrieval line will be firmly fastened outside the space so that rescue can begin as soon as personnel are aware that retrieval is necessary. A mechanical device will be available to retrieve personnel from vertical confined spaces more than five feet deep.

Employee Training
IMEDCO America will develop, maintain and provide training to each affected employee whose work is regulated by the Confined Space Program. The training will provide the understanding, knowledge and skills necessary to safely perform required work in confined spaces. Training will be conducted:

41. Before the employee is first assigned duties involving confined spaces
42. Before there is a change in an affected employee's assigned duties
43. When there is a change in a permit-required confined space operation that presents new hazards not previously covered in training
44. When IMEDCO America has reason to believe that there are deviations from the permit-required confined space entry procedures, or that there are inadequacies in the employee's knowledge or use of these procedures

General Training Requirements. All affected employees will receive training on the following general information:

45. Specific hazards associated with the confined space to be entered
46. Personal protective equipment selected for the hazard(s), including proper use, inspection, care and maintenance, limitations and other applicable safety instructions
47. The permit system and other procedural requirements for conducting a confined space entry
48. Responding to emergencies
49. Duties and responsibilities of confined space entry team members
50. How to recognize probable air contaminant overexposure symptoms in themselves as well as co-workers, and methods for alerting assigned Attendants

Training for Attendants. In addition to the general training requirements above, Attendants will also be trained on the following:

51. Duties, responsibilities and procedures for both routine and emergency operations
52. Hazards that may be encountered by Entrants and the signs and symptoms of overexposure
53. Procedures for summoning rescue or other emergency services
54. Proper use of the equipment used for communicating with Entry and Rescue Personnel
55. Performance of non-entry retrievals

Verification of Training. Periodic assessment of the effectiveness of employee training will be conducted by the Program Administrator. Refresher training will be conducted as needed to maintain employee competence in entry procedures and precautions**.** Training records will be documented on the Employee Training Record form provided in **Appendix F.** Written training records will be retained by the Program Administrator and be periodically reviewed to ensure proper follow-up for refresher training.

Outside Contractors

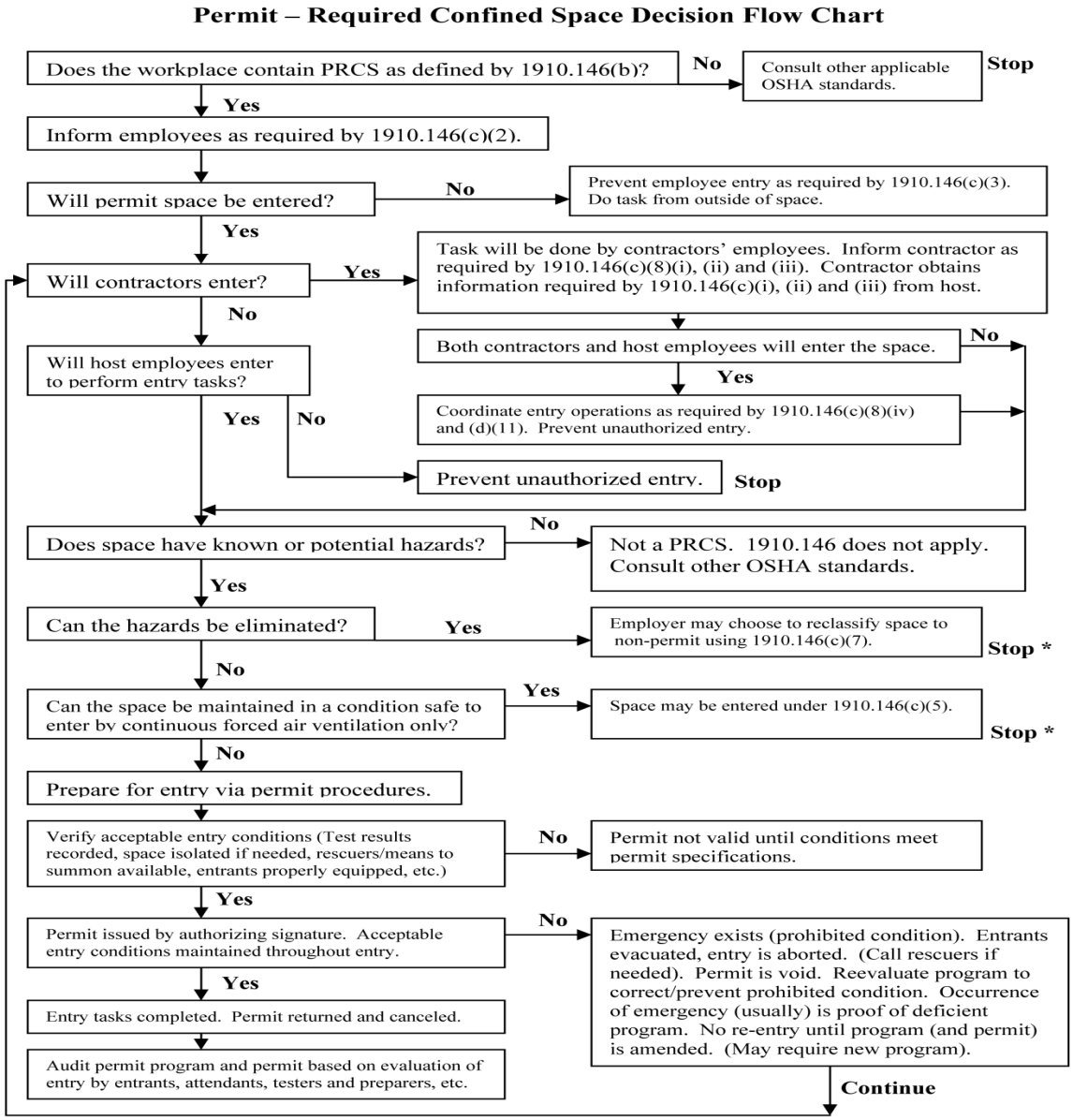
Whenever outside personnel are contracted to perform work that involves confined space entry, IMEDCO America will inform the contractors about any relevant confined spaces, including:

56. The classification of the space (permit-required or non-permit)
57. The hazards and operations within or near the space
58. IMEDCO America experiences with the space
59. Any precautions or procedures that were implemented for the protection of employees in or near the confined space

IMEDCO America will evaluate potential contractors to ensure they have the appropriate qualifications for the full scope of work to be performed, including a confined space safety program. Contractors will ensure a permit-required confined space program is being followed.

The contractor will establish who will serve as the rescue responder, in conjunction with the Program Administrator, in an emergency and what system will be used to notify the responder that an emergency exists. When both IMEDCO America and contractor personnel will be working in or near a permit-required confined space, the two parties will coordinate their activities to ensure all entry roles are complementary with IMEDCO America as the lead.

Appendix A – Permit-Required Confined Space Decision Flow Chart



***Spaces may have to be evacuated and re-evaluated if hazards arise during entry.**

Source: Occupational Safety and Health Administration

Appendix B – Identification of Test Instruments

MFG. NAME			
TYPE			
IDENTIFICATION NO.			

Name of tester:

_____

Special Requirements	Yes	No	Comment
Lockout/Tagout Equipment			
Supply Lines – Capped/Blanked			
Purging – Flush and Vent			
Ventilation			
Secure Area			
Breathing Apparatus			
Resuscitator			
Hot Work Permit			
Electronic Communication Devices			
Equipment for Maintaining Contact			
Lifelines			
Escape Harness			
Tripod Emergency Escape Unit			
Fire Extinguishers			
Lighting			
Alarm System			
Respirator			
Personal Protective Equipment (Identify)			

Appendix C – Inventory and Hazard Assessment of Confined Spaces
Completed by _____
Date _____

Confined Space Name	Location	Hazardous Atmosphere	Engulfment Hazard	Entrapment Hazard	Hazardous Energies	Other Hazards (Specify)	Permit Required	Entry Not Allowed

Name of Confined Space	Location

Date	Percent Oxygen	Percent LEL	PPM Carbon Monoxide	PPM Hydrogen Sulfide

Appendix E – Confined Space Entry Permit

Confined Space Permit

Confined space name:
_____

Description of confined space:
_____

Confined space location:
_____
_____

Date of entry: _____

Duration of permit: _____ Entry time:
_____

Purpose of entry:
_____

_____

_____

List all authorized entrants:
_____

_____

Means of identifying entrants inside the space:
_____

_____

Name of attendant(s):
_____
_____

Hazards within the space:
_____

_____

Hazard control techniques:
_____

_____

_____

Atmospheric test results:
_____

Communications procedures:
_____

_____

PPE provided:

_____

_____

Additional permits issued:

_____

_____

Rescue Service contact information:

_____

_____

Other information:

_____

_____

_____

Acceptable Entry Conditions? _____ **YES** _____ **NO**

Name of entry supervisor:

_____

Signed:

_____

Appendix F – Employee Training Sign-In Sheet

The following individuals have received training on IMEDCO America Confined Space Program.

Print Name	Sign Name	Date

Print Instructor's Name	
Instructor's Signature	
Instructor's Title	
Date of Training	

Appendix G – Confined Space Reclassification

Confined Space Reclassification Certification

I, _____ certify that permit-required confined space
(print name)
_____ located _____
is free of
(confined space name) (physical location)
all non-atmospheric hazards and has never, and does not currently contain, atmospheric hazards based on testing conducted _____ .
(testing date)

Signature: _____
Date: _____

Appendix H – Permit-Required Confined Space Hazard Mitigation

Permit-Required Confined Space Hazard Mitigation

Confined Space Name	
Location	**Date**

Identified Hazard(s)	**Mitigation Plan(s)**

Signed: _____ Date: _____

Appendix I – Permit-Required Confined Space Extraction Protocol

Permit-Required Confined Space
Extraction Protocol

Confined Space Name	
Physical Location	**Date**
Extraction Supplies Needed	**Extraction Plan(s)**

Signed: _____ Date: _____

Bloodborne Pathogens Standard:

Model Exposure Control Plan

POLICY

IMEDCO America is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this goal, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 *CFR* 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist our organization in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

1. Determination of employee exposure
2. Implementation of various methods of exposure control, including:
   i) Universal precautions
   ii) Engineering and work practice controls
   iii) Personal protective equipment
   iv) Housekeeping
3. Hepatitis B vaccination
4. Post-exposure evaluation and follow-up
5. Communication of hazards to employees and training
6. Recordkeeping
7. Procedures for evaluating circumstances surrounding exposure incidents

Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.

PROGRAM ADMINISTRATION

- Matt Krachon is responsible for implementation of the ECP, and will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location/phone number: 317-773-8500.

- Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.

- Matt Krachon will provide and maintain all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. Matt Krachon will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone number:317-773-8500

- Matt Krachon will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained. Contact location/phone number:317-773-8500

- Matt Krachon will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact location/phone number:317-773-8500

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions All employees will utilize universal precautions.

Exposure Control Plan

Employees covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All employees can review this plan at any time during their work shifts by contacting Matt Krachon if requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

Matt Krachon is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

Engineering Controls and Work Practices
Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

(For example: non-glass capillary tubes, SESIPs, needleless systems)

Sharps disposal containers are inspected and maintained or replaced by (*Name of responsible person or department*) every (list frequency) or whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering controls and work practices through (Examples: Review of OSHA records, employee interviews, committee activities, etc.)

We evaluate new procedures and new products regularly by (Describe the process, literature reviewed, supplier info, products considered)

Matt Krachon is responsible for ensuring that these recommendations are implemented.

Personal Protective Equipment (PPE)
PPE is provided to our employees at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by Matt Krachon

The types of PPE available to employees are as follows:

gloves, eye protection, hard hats, hearing protection, high visibility vest, etc.

PPE is located in our vans, gang boxes, shop and may be obtained through Matt Krachon.

All employees using PPE must observe the following precautions:

8. Wash hands immediately or as soon as feasible after removing gloves or other PPE.
9. Remove PPE after it becomes contaminated and before leaving the work area.
10. Used PPE may be disposed of in (List appropriate containers for storage, laundering, decontamination, or disposal.)
11. Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or OPIM, and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.
12. Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
13. Never wash or decontaminate disposable gloves for reuse.
14. Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.
15. Remove immediately or as soon as feasible any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface.

The procedure for handling used PPE is as follows:

dispose of it properly

Housekeeping Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see the following section "Labels"), and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for handling sharps disposal containers is: *a third party professional*

The procedure for handling other regulated waste is: *a third party professional*
Contaminated sharps are discarded immediately or as soon as possible in containers that are closable,

puncture-resistant, leak proof on sides and bottoms, and appropriately labeled or color-coded. Sharps disposal containers are available at (must be easily accessible and as close as feasible to the immediate area where sharps are used).

Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.

Laundry The following contaminated articles will be laundered by this company:

Laundering will be performed by Matt Krachon at (time and/or location).

The following laundering requirements must be met:

- handle contaminated laundry as little as possible, with minimal agitation
- place wet contaminated laundry in leak-proof, labeled or color-coded containers before transport. Use red bagsfor this purpose.
- wear the following PPE when handling and/or sorting contaminated laundry: pathogens kit

Labels The following labeling methods are used in this facility:

Equipment to be Labeled Label Type red bags from our pathogens kit

Matt Krachon is responsible for ensuring that warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into the facility. Employees are to notify Matt Krachon if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.

HEPATITIS B VACCINATION

Matt Krachon will provide training to employees on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after initial employee training and within 10 days of initial assignment to all employees identified in the exposure determination section of this plan. Vaccination is encouraged unless: 1) documentation exists that the employee has previously received the series; 2) antibody testing reveals that the employee is immune; or 3) medical evaluation shows that vaccination is contraindicated.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept at IMEDCO America headquarters.

Vaccination will be provided by Matt Krachon.

Following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee within 15 days of the completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, contact Matt Krachon at the following number 317-773-8500.

An immediately available confidential medical evaluation and follow-up will be conducted by Matt

Krachon. Following initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's health care provider.
- If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).
- After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status
- If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

Matt Krachon ensures that health care professional(s) responsible for employee's hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's blood borne pathogens standard.

Matt Krachon ensures that the health care professional evaluating an employee after an exposure incident receives the following:

- a description of the employee's job duties relevant to the exposure incident
- route(s) of exposure
- circumstances of exposure
- if possible, results of the source individual's blood test
- relevant employee medical records, including vaccination status

Matt Krachon provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

Matt Krachon will review the circumstances of all exposure incidents to determine:

- engineering controls in use at the time
- work practices followed
- a description of the device being used (including type and brand)
- protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- location of the incident (O.R., E.R., patient room, etc.)
- procedure being performed when the incident occurred
- employee's training

Matt Krachon will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log.

If revisions to this ECP are necessary Matt Krachon will ensure that appropriate changes are made. (Changes may include an evaluation of safer devices, adding employees to the exposure determination

list, etc.)

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by Matt Krachon 30 hour cert, safety officer, and lifeguard.

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

16. a copy and explanation of the OSHA bloodborne pathogen standard
17. an explanation of our ECP and how to obtain a copy
18. an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
19. an explanation of the use and limitations of engineering controls, work practices, and PPE
20. an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
21. an explanation of the basis for PPE selection
22. information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
23. information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
24. an explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
25. information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
26. an explanation of the signs and labels and/or color coding required by the standard and used at this facility
27. an opportunity for interactive questions and answers with the person conducting the training session.

Training materials for this facility are available at IMEDCO America.

RECORDKEEPING

Training Records Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at IMEDCO America.

The training records include:

28. the dates of the training sessions
29. the contents or a summary of the training sessions
30. the names and qualifications of persons conducting the training
31. the names and job titles of all persons attending the training sessions

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to Matt Krachon.

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 *CFR* 1910.1020, "Access to Employee Exposure and Medical Records."

Matt Krachon is responsible for maintenance of the required medical records. These confidential records are kept in his office for at least the duration of employment plus 30 years.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to Matt Krachon.

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by (*Name of responsible person or department*).

Sharps Injury Log
In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:

32. date of the injury
33. type and brand of the device involved (syringe, suture needle)
34. department or work area where the incident occurred
35. explanation of how the incident occurred.

This log is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

HEPATITIS B VACCINE DECLINATION (MANDATORY)

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

Signed: (*Employee Name*) _____ Date: _____

The hazard communication standard requires you to develop a written hazard communication program. The following is a sample hazard communication program that you may use as a guide in developing your program

INJURY AND ILLNESS PREVENTION PROGRAM

Employee Responsibilities
Employees must recognize that their role in creating a safe work environment is critical. This includes having a responsible attitude for safety and the welfare of themselves and other employee personnel. Employees shall:

1. Demonstrate an ability to physically perform their assigned job function.
2. Perform every job safely, using appropriate personal protective equipment, safety devices, Job Safety Analysis, as appropriate, and by practicing safe behaviors.
3. Immediately report injuries, incidents, unsafe actions, and unsafe conditions to their supervisor.
4. Immediately report any health conditions (temporary or permanent), which may impair their ability to perform their job function in a safe manner.
5. Cooperate in the investigation of injuries and incidents.
6. Attend safety meetings and training.
7. Learn the contents of this program and other relevant safety programs.

All employees are encouraged to use Stop Work Authority when an unsafe condition exists, when unsure of safe work practices, when job scope changes, or when simultaneous operations create a hazardous environment.

Compliance
By complying with safe and healthy work practices management, supervisors and employees will work together to create and maintain a safe workplace environment. Compliance is achieved by:

8. A. Informing employees about the provisions of our IIPP.
9. B. Evaluating the safety performance of our employees.
10. C. Recognizing employees who follow safe and healthful work practices which could include gift certificates or other safety incentive awards.
11. D. Providing training to employees whose safety performance is deficient.
12. E. Disciplining employees for failure to comply with safe and healthy work practices.

Discipline Policy
Employees and contractors of IMEDCO America are responsible for performing each job safely. Management and supervisors must hold employees accountable for behavior and actions. Employee actions that violate the intent of this IIPP will result in disciplinary action up to and including termination of employment.

Communication

13. The management of IMEDCO America will maintain an environment where safety and health issues may be discussed openly and without fear of reprisal. Communication from an employee to the supervisor may be verbal and/or by written statement. Safety and health matters are communicated to employees in verbal and written form through documents, pre-job meetings, formal and informal training, postings, distributed safety information, and safety meetings. The results of safety audits/inspections and incident investigations are reviewed during safety meetings as necessary with impacted individual personnel.
14. Scheduled Safety Meetings Safety committee meetings are scheduled to be held monthly unless otherwise noted. Employees are responsible for attending safety meetings, either office based or job-site tailgate meetings. If employees cannot attend a safety meeting, they will review the material discussed at that meeting with their supervisor. Safety meeting attendance is recorded and maintained by the IIPP Facilitator as appropriate.
15. Tailgate Meetings Each work group or individual, depending on circumstances, will complete a Job Safety Analysis for high risk tasks (JSA) and conduct a tailgate safety meeting with their work group prior to commencing high risk jobs. Permitted activities (e.g., confined space entry, hot work) will utilize an applicable safe work permit.
16. New Employee Orientation New employees are required to receive new hire orientation and training. This includes training on safe practices, employee responsibilities, emergency response and general safety rules.
17. Posting and Distribution of Safety Information Information regarding safety is posted on a safety bulletin board and/or may be distributed in paper or electronic form periodically.
18. Anonymous Communication HPS MECHANICAL INJURY AND ILLNESS PREVENTION PROGRAM 6 Employees may inform management anonymously about workplace hazards by using a safety suggestion box, or by other anonymous means.

Hazard Assessments
Supervisors/Safety Facilitator will conduct periodic inspections or audits to identify hazards and unsafe work practices, conditions or equipment. The inspection or audit may be conducted as part of an incident investigation. At a minimum, inspections will be conducted:

19. When this IIPP is first implemented.
20. Periodically as warranted by changes in workplace conditions.
21. Whenever new substances, processes, procedures or equipment are introduced into the workplace that represents a serious safety or health hazard.
22. Whenever the supervisor is made aware of a previously unrecognized hazard.
23. During the job-site inspection process.

Injury Reporting and Investigation
Employees must report all injuries and incidents to their supervisor immediately. Supervisors will notify the IIPP Facilitator of the injury or incident as soon as it is practical to do so. Appropriate medical treatment shall be provided and corrective action taken. An investigation will be performed consistent with the circumstances. Investigations will, at a minimum, include the involved employee(s) and the appropriate supervisor. When appropriate, such as in cases where a formal investigation is performed, the investigation will include the following:

24. Identification of causal factors and root causes.
25. Identification of actions required to prevent reoccurrence.
26. Identification of the persons responsible for corrective actions.
27. Recording of completion dates for corrective actions. The results of investigations will be reviewed by the Program Administrator and shared with employees during safety meetings or other venues. The effectiveness of corrective actions will be evaluated during subsequent inspections and audits. Serious injuries will be reported to Cal-OSHA per the Cal-OSHA serious injury reporting requirement.

Hazard Correction

Employees, supervisors, or management will correct unsafe conditions and practices when they are discovered. When an imminent hazard exists which cannot be immediately abated without endangering employees and/or property, all workers will be removed from the area except those that are required to remain in the area to correct the hazard. Workers that are required to correct hazards will be provided with the equipment necessary to ensure their safety. Documentation of hazard correction will be completed by the supervisor and maintained by the IIPP Facilitator. The Program Administrator will review all hazard correction records.

Training
All employees will receive training for the specific safety and health hazards of their job. General Safety Training is provided:

28. To all new employees
29. To all employees given a new job assignment for which no previous training has been provided.
30. Whenever new substances, processes, procedures, or equipment is introduced to the workplace that represents a new hazard.
31. When a new or previously unrecognized hazard is brought to the attention of management.
32. For supervisors so they are familiar with hazards faced by the employees under their control.

Training on General Safety Rules is provided to ensure compliance with safe work practices. General Safety Rules are reviewed during new employee orientation and periodically during safety meetings. Supervisor Safety Training is provided in addition to the standard employee training.

Recordkeeping
Hazard assessment and correction records, orientation and training records, and incident investigation records, JSAs, and Safe Work Permits, will be maintained by the IIPP Facilitator for a minimum of three years.

IMEDCO AMERICA INJURY AND ILLNESS PREVENTION PROGRAM RESPONISIBLE MANAGER SIGN OFF.

The person with the authority and responsibility for this IIPP's implementation is identified as:

_Matt Krachon_____Printed Name _____ Signed Name

HEAT ILLNESS PREVENTION PROGRAM

Scope
IMEDCO America has developed this Heat Illness Prevention Program to prevent the occurrence of heat illnesses, to plan for heat illness should it occur, and to comply with the Cal/OSHA Heat Illness Prevention standard. This program applies to employees in all outdoor places of work where a risk of heat illness exists. II.

Definitions
Shade: Blockage of direct sunlight and may be provided by any natural or artificial means that does not expose employees to unsafe or unhealthy conditions and that does not prevent access or use.

Acclimatization: Temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within for to fourteen days of regular work for at least two hours per day in the heat. Proper and constant hydration is a key component of acclimatization.

Heat Illness: A serous medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke. Environmental

Risk Factors for Heat Illness: Working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal equipment worn by employees.

Personal Risk Factors for Heat Illness: Factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat.

Preventative Recovery Period: A period of time to recover from the heat in order to prevent heat illness.

Responsibilities
IMEDCO America management is responsible for ensuring compliance with this Heat Illness Prevention Program.

IMEDCO America HEAT ILLNESS PREVENTION PROGRAM

IMEDCO America shall:
1. Train all employees, including supervision, on the provisions of this program.
2. Comply with all provisions of this program.

Training
Training shall be provided to employees and supervisors prior to their commencement of outdoor work in which the potential for heat exposure and subsequent heat illness symptoms may occur. Training information will include:
3. The environmental and personal risk factors for heat illness.
4. The employer's procedures for complying with the requirements of this standard (e.g., implementing action level requirements during 80 degree temperatures and above).
5. The importance of frequent consumption of small quantities of water, up to 4 cups per hour, when the work environment is hot as employees are likely to be sweating more than usual in the performance of their duties.
6. The importance of acclimatization.
7. The different types of heat illness and the common signs and symptoms of heat illness, and how heat illness can process from mild symptoms and signs to serious and life threatening illness.
8. Prevention of heat stress.
9. The availability of shade and period of time for the preventive recovery of an employee who needs and/ or expresses that need for such a recovery time.
10. The importance to employees of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers.
11. The employer's procedure for responding to symptoms of possible heat illness, including how first aid or emergency medical services will be provided should they become necessary (Attachment A).
12. Ensure the presence of sufficient drinking water for all employees.
13. Encourage the presence of adequate shade for all employees.
14. Monitoring the weather.
15. Adjust work hours and/or work conditions when necessary (such as during a heat wave or when temperatures reach 95 degrees or higher).
16. Ensure any employee is provided with a recovery period if the employee is suffering from heat illness, appears to be suffering from heat illness, or an employee believes a preventive recovery period is necessary.
17. A supervisor will have authority to adjust the crew's working hours in the event of hot working conditions, such as air temperature exceeding 95 degrees or the occurrence of a heat wave.
18. Communication to employees of the HIPP is available to them at the worksite upon request.

Acclimatization
19. Employees new to working during "heat wave" environments are at the highest risk of heat illness. This potentially includes all new employees, as well as employees returning to work after an absence from working in a hot outdoor environment. Heat wave is when the predicted temperature will be at least 80 degrees Fahrenheit and at least 10 degrees higher than the preceding 5 day average high daily temperature.
20. As noted above, employees shall initially work no more than six (6) hours when beginning work, or until acclimatized.

21. Employees may be assigned a longer work period in a hot outdoor environment after the employee and the supervisor agree that the employee has become acclimatized. The supervisor will make such a decision based on frequent observation of the employee, discussions with the employee and the workplace and environmental conditions. In no case will any employee work a shift of eight (8) hours or more until it is certain the employee is able to do so safely. Newly assigned employees shall be closely monitored for a period of 14 days by the supervisor.

Provision of water

22. The employer shall provide drinking water in sufficient quantities so that each employee has access to one quart of water per hour throughout the entire work shift.
23. Water shall be fresh, pure, suitably cool, and provided by IMEDCO America management. All sources of drinking water shall be maintained in a clean and sanitary condition. Water shall be located as close as practicable to employee work areas.
24. The dipping or pouring of drinking water from containers is prohibited regardless of whether or not the containers are fitted with covers. The use of a common cup, glass or other vessel for drinking purposes is prohibited.
25. Any necessary replenishment of water will be accomplished by the supervisor with sufficient lead-time to ensure compliance with a one quart/per hour/per employee requirement.
26. During tailgate meetings, supervisors shall discuss and encourage employees to drink water constantly throughout the day.

Access to shade

The employer shall make available shade to employees when the temperature exceeds 80 degrees Fahrenheit. This shaded area shall:

27. Be sufficient enough to block direct sunlight (so that the employee does not cast a shadow in the area of blocked sunlight) and may include areas under canopies (pop-ups).
28. Be located as close as practical to work areas.
29. Be either open to air or provided with ventilation or cooling.
30. Have sufficient space to reasonably accommodate each member of the crew at any time including meal periods.
31. Shade is not adequate when heat in the area of shade defeats the purpose of the shade, which is to allow the body to cool. Using vehicles and machinery which may cast a shadow during part of the day, is not a sufficient source of shade.
32. A part of employee training and at tailgate meetings, supervisors shall inform employees what shade is available and how to access shade.
33. Shade may be provided in the form of canopies or pop-ups and the supervisor will determine the location of such pop-ups at each area of operation and will ensure the erection of needed pop-ups prior to the commencement of work at each area of operation.
34. As work of the crew progresses in the area of operation, pop-ups may be moved or additional pop-ups may be erected.
35. The location of the pop-ups much be maintained within the work location of the crew to ensure such shade will be accessible and not require travel of more than one quarter (1/4) of a mile walk or five (5) minutes of walk travel, whichever is less, from the work location of the crew.
36. Supervisors will encourage the use of shade for any employee who exhibits signs or symptoms of heat illness or who requests access to shade. A properly air-conditioned vehicle constitutes an acceptable means of shade provision.

High heat procedures

High-heat procedures shall be implemented when the temperature equals or exceeds 95 degrees Fahrenheit. These procedures include, to the extent practicable:

37. Ensuring that effective communication by voice, observation, or electronic means is maintained so that employees at the work site can contact a supervisor when necessary. Cell phones may be used for this purpose only if there is reliable reception.
38. Frequent observation of employees for any heat illness sign or symptom.
39. Reminding employees throughout the entire work shift to hydrate frequently.
40. Close supervision of new employees by a supervisor or designee for the first 14 days of the employee's employment, unless the employee indicates at the time of hire that he or she has encountered similar outdoor conditions for at least 10 of the past 30 days and for 4 or more hours per day.

41. Pre-shift meetings will be held prior to starting work to review the high-heat protocol including reminders for employees to take a cool-down rest period when necessary.

Preventative Recovery Period:
Any employee suffering from heat illness, appearing to be suffering from heat illness, or believing a preventive recovery period is needed, shall be immediately provided with access to an area with shade for that period of time necessary for a recovery, not less than five (5) minutes in duration. The employee shall be promptly evaluated by the supervisor to determine whether emergency medical services are necessary and, if so, the supervisor shall comply with the emergency response provision of the program. The employee must not return to work until any signs or symptoms of heat illness have abated.

Responding to Symptoms of Heat Illness:
Upon learning that an employee may be suffering from heat illness, appearing to be suffering from heat illness, or being informed by an employee or believing a preventive recovery period is need for an employee, the supervisor will instruct the employee to stop working and go to the shaded area provided by the employer. In the shaded area, the supervisor will assess the affected employee's condition. If in, the supervisor's judgment, the affected employee is suffering from heat illness or upon the affected employee's belief that he/she is suffering from heat illness, the supervisor will notify the next level of management and will follow the procedures for providing emergency medical services. The employee will be encouraged to drink water, and the supervisor will designate a second employee knowledgeable in recognizing the symptoms of heat illness to remain with the affected person during the preventative recovery period. In the event any employee or supervisor forms an opinion that an employee has in fact suffered or may suffer from heat illness, the supervisor will ensure appropriate first aid care is provided pending the arrival of emergency response services. If in the supervisor's judgment, the affected employee is not suffering from heat illness, the affected employee will be instructed to wait in the shaded area until it is determined the employee may return to work. Supervisors shall be trained on heat illness recognition (i.e. decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, or convulsing) and emergency response procedures.

Procedures for Providing Emergency Medical Services:
Prior to beginning work in each area of operation, the supervisor will inform employees on the jobsite of the work location and the type of work. An employee will be designated to meet emergency responders at an identified location and direct the emergency responders to the location of the employee suffering from heat illness. If necessary, employee(s) will be transported to meet emergency responders depending on the situation. In the event a supervisor is not present or is unavailable to contact emergency medical services, one or more employees will be directed at the beginning of work to implement the procedures if needed. The supervisor will be equipped with means of communication such as a cell phone or radio.

Records:
Records of employee training will be maintained in accordance with the Company's Injury and Illness Prevention Program.

SECTION E – SAFETY DIRECTOR RESPONSIBILITY

IMEDCO will have on staff at all times an individual whose primary responsibilities include the role of Safety Director who is responsible for the following:

1. The S.D. will oversee the IMEDCO safety program
2. The S.D. will have competed OSHA 30 hour safety training course
3. The S.D. will report directly to upper management all safety related issues.
4. The S.D. will ensure that all Project Managers, Site Superintendents and Field Technicians are trained regarding IMEDCO safety procedures.
5. The S.D. will conduct New Hire Safety Orientation
   i) Orientation will be conducted prior to conducting work
   ii) A New Hire Safety Orientation Checklist will be completed and kept on file
6. The S.D. is responsible for administering the Hazardous Communication Program.
7. The S.D. will personally conduct random safety inspections (Appendix B).
8. Corrective action resulting from safety inspection will be documented.

SECTION F – SITE SUPERINTENDENT RESPONSIBILITY

The lead IMEDCO site superintendent has primary responsibility for the overall safety on a project site and is responsible for the following:

1. Making weekly safety inspections (Appendix C) of the job site and initiate necessary corrective actions to eliminate unsafe conditions.
2. Corrective action resulting from safety inspections will be documented.
3. Require all IMEDCO employees and subcontractors to comply with all aspects of the IMEDCO safety program
4. Require all IMEDCO employees and subcontractors to provide and enforce at all times the use of appropriate personnel protective equipment.
5. Require all subcontractors to designate on on-site superintendent responsible for safety compliance.
6. Report the occurrence of all accidents by filling out the Accident Report Form, (See Appendix G) even if the accident does not result in injury or property damage. Depending upon the nature of the accident, other reports may be required. Sample forms and instructions for filling out the forms are in the Appendix.
7. Review accidents and institute corrective action to prevent re-occurrence.
8. Become familiar with the Accident Prevention Manual, and especially with the Project Safety Program Requirements. This manual should be acceptable to the Shielding Technicians.
9. NOTE: OSHA Safety and Health Regulations for Construction, paragraph 1926.20 and 1926.21 require, in part, that employers establish accident prevention programs.
10. IMEDCO Site Superintendent will conduct a toolbox talk safety meeting on a weekly basis. This safety meeting will include a brief inspection of tools being used at the jobsite. This must include but is not limited to;
11. Power cords and extension cords cannot be frayed or damaged
12. Power tools must be properly guarded and in good working condition
13. PPE is in good working condition

1. All construction offices, sheds, etc., that are involved in the project, are to be located within 30 feet of any principal structure and should be of noncombustible construction.
2. Any temporary enclosures should be adequately fastened against windstorm exposure.
3. All scaffolding should be constructed of steel, aluminum, or treated lumber.
4. It should be a strict requirement that all engines are shut down prior to refueling operations.
5. No equipment service areas should be located in any significant structure under construction.
6. No fuel storage should be located in any significant structure under construction.
   All cutting and welding operations should fall under strict adherence to guidelines as recommended by the National Fire Protection Association, and frequent observation of adherence to such practices during welding activity is recommended.
7. Non-smoking areas should be designated. Periodic monitoring and enforcement of this policy are required.
8. Accumulation of combustible trash inside any significant structure under construction should be disallowed.
9. Storage and handling of flammable liquids should strictly conform to the provisions as outlined in the National Fire Protection Association codes.
10. The various phases of construction should consider priority for building features such as firewalls, exit stairways, fire doors, etc., so as to provide protection against lost property and personnel as early in the project as possible.
11. Care should be taken to maintain access for fire trucks
12. During any construction project, priority should also be given to features such as water supplies and major outdoor fire protection equipment, so as to maximize protection availability in the event of any emergency.
13. Fencing around the construction area is highly recommended due to the significant increase in security provided.

PROPERTY LOSS REPORTING

Reporting of a loss:
Job site Responsibility

1. The Project Manager and or Superintendent shall file a written report of all losses to the Home Office. See Appendix A for reporting procedures.
2. The Project Manager or Superintendent should never contact the Insurance Company directly unless it is of utmost importance that an adjuster is on the site immediately, and he is unable to contact the Corporate Director of IMEDCO.

IMEDCO Responsibility

3. IMEDCO should then report by telephone to the Insurance Company any losses that may be claimed under any policy. A written report should be submitted as soon as it is available. All losses should be reported to the COO prior to any filing of reports.
4.
5. At the time of notification, as much of the following information as is available should be provided:
   i) Location of loss - specific address
   ii) Date and time of loss
   iii) Type of loss - Fire, wind, transit, etc.
   iv) Description of occurrence/damage to property involved
   v) Estimate of loss
   vi) Individual, with address and telephone number, for insurance company adjuster to contact for inspection of loss.
   vii) When possible immediately obtain photographs of loss.

Inspection of loss:

6. All losses will be inspected by an adjuster shortly after the loss is reported, and after calling the individual that “The Company” has designated.
7. All damages should be shown to the adjuster and as much information after loss as possible should be provided.

8. If the adjuster has any questions or comments regarding insurance coverage or liability, he should be referred to the Corporate Director of IMEDCO
9. It will be determined at the time of loss if an IMEDCO representative will be present at the time of inspection.

Claim Presentation Verification and Adjustment:

10. Upon completion of repairs or obtaining firm estimates, all details of claim should be submitted to IMEDCO Home Office, to be submitted to Insurance Company.
11. For property damage, details should include a summary describing the items and cost with supporting invoice, purchase orders, labor details, etc., attached.
12. For any theft or burglary losses, details should include a list of all stolen and damaged property, with a brief description of each item and replacement cost, together with estimate for same if available. All original invoices should be made available.
13. For any business interruption, loss should be summarized showing downtime, production losses, sales loss, loss of earnings with documentation to support the claim loss, etc.
14. The insurance company will review the claim and will probably request additional information and request a meeting. This is usually necessary when there is a business interruption claim.
15. Upon the completion of adjustment, the insurance company will provide all forms for signatures, and will draft a payment to IMEDCO for the claim.

Loss Records:

16. IMEDCO will obtain a permanent record of all adjusted losses. This will include such information as: insurance company, policy number, date of loss, location, type of loss, deductible, amounts paid, all reports that were submitted, etc.

Subrogation:

17. For all losses involving subrogation, i.e., damages to your property by a third party's negligence, details submitted should include as much information as possible about the third party's identity, and a letter should be sent to the third party holding them responsible for the damages.

See appendix D for the "Damage to Equipment and Property Investigation Form"

SECTION H - CASUALTY ACCIDENT REPORTING AND INVESTIGATION

The prompt reporting and investigation of accidents is an important part of any safety program. A key objective of accident reporting is to find the cause of the accident and document corrective measures. In the event of an accident, the IMEDCO site superintendent must complete the Accident Investigation Report and see that one copy of each is sent to the home office within 24 hours after the accident. A copy must also be kept in the job site file. Sample of the "Accident Report" appears in **Appendix F**. Please obtain these forms from the home office if not found in supplies.

When an accident results in injury, follow the procedure below:

Injury to a workman

1. See that prompt first aid is administered.
2. When an injury caused by loss of time from regular duties beyond the end of the working day or shift on which the accident occurred, or if the injured workman requires medical treatment beyond ordinary First Aid, or if there is an occurrence of an occupational disease whether or not time is lost, the employer must complete the form "Accident Report". The Project Manager and or Site Superintendent shall file a written report of all losses to the Safety Director. See Appendix A for reporting procedures.
3. Statements from the injured employee and witnesses are to be recorded on the "Accident Report"
4. The Safety Director will conduct an accident analysis of each incident and report findings to management.
5. In the event that the injured workman is an employee of another contractor or subcontractor, "The Company" safety supervisor shall require the employer to submit a copy of the report to him for "The Company" files. Each contractor and subcontractor who is engaged by "The Company" must submit evidence of insurance coverage that meets "The Company's" minimum requirements prior to being allowed on the job sight.
   In all accidents involving failure of tools or equipment, the defective product should be retained for inspection and not used until inspection is complete and/or the tool is replaced.
6. All serious cases (i.e., fatalities or multiple serious injuries) should be reported by telephone to the home office.
7. The Safety Director will notify the appropriate State agency if required.
8. Notify the Safety Director immediately if the claimant does, in fact, return to work.
9. The total monthly job site injuries will be recorded on the Monthly Project Accident Report by the Safety Director. Copies of this report should be forwarded to the home office by the third of each month.

Injury to a member of the public or damage to the property of others.

10. After filling out the Accident Investigation Report, IMEDCO Safety Director will fill out the General Liability Loss Notice required by the insurance company.

Auto Accidents involving IMEDCO vehicles.

11. Employee is required to contact Safety Director immediately. Fill out Automobile Loss Notice required by IMEDCO.

General Liability

12. If there is serious bodily injury or Property Damage, see Appendix A for reporting procedures.
13. Identify names and addresses of: employees, supervisors, witnesses, etc.
14. Obtain paper work: contracts, work orders, subcontracts, purchase orders, certificate of insurance, notes from prior safety meetings, etc.

Please see Appendix B for "The Safety Checklist for Project Manager"

Please see Appendix C for "The Daily Safety Checklist for Site Safety Supervisors"

SECTION I - FIRST AID AND EMERGENCY PROCEDURES

The Occupational Safety and Health Act (OSHA) require all employers to provide adequate first aid facilities and to have at lease one employee trained in first aid.

The Site Superintendent shall:

1. Be trained by a certified organization, such as the American Red Cross, and periodically update this training as required by the IMEDCO.
2. Conduct orientation meeting to discuss emergency procedures at the start of each job and notify employees of the nearest medical facility in case of emergency.
3. Maintain a first aid kit and inspect it regularly so that used materials can be replaced. The size of the kit you will need will depend upon the number of workers present on the job site. The Safety Director will order the first aid kits and supplies unless indicated otherwise.
4. Know what to do in case of:
   i) Serious injury
   ii) Fire
   iii) Unusually sever weather
   iv) Bomb threats

MEDICAL TREATMENT VS. FIRST AID (MINOR INJURY)

The following guidelines can be used in determining if various types of injuries are First Aid (not recordable, but reportable) or Medical Treatment.

LACERATIONS:
FIRST AID: Treatment is limited to cleaning the wound, soaking, applying antiseptic and/or medication, or Band-Aids to cover superficial lacerations. Follow-up visits are limited to observation or additional cleaning and application of antiseptic.

MEDICAL TREATMENT: Injuries that require sutures (stitches), butterfly closures for non-cosmetic purpose, surgical debridement (cutting away dead skin), treatment of infection or other professional treatment.

ABRASIONS:
FIRST AID: Treatment is limited to cleaning the wound, soaking, applying antiseptic and/or medication (see medication), and dressing made necessary by exposure to the environment, which do not in any way restrict movement or use of the injured person.

MEDICAL TREATMENT: Injuries that require careful examination for the removal of foreign material, multiple soaking, whirlpool treatments, or other professional treatment. (Treatment of abrasion occurring to greater than full skin depth is considered Medical Treatment.)

BRUISES:
FIRST AID: Treatment is limited to signal soaking or application of cold compresses. Follow-up visits limited only to observation.

MEDICAL TREATMENT: Cases that require multiple soakings, drainage of collected blood or other extended care beyond observation.

SPLINTERS AND PUNCTURE WOUNDS:
FIRST AID: Treatment is limited to cleaning the wound, removal of foreign object, nonprescription medication, and bandaging on the first visit. Follow-up visits are limited to observation, including changing the bandage.

MEDICAL TREATMENT: An injury that requires the removal of foreign object by a physician due to the depth of embedment, size or shape of objects or location of the wound, treatment of a reaction to tetanus booster, or other professional treatment is considered medical treatment.

BURNS, THERMAL, AND CHEMICAL:

FIRST AID: Treatment is limited to cleaning or flushing, soaking, applying cold compresses, antiseptics and/or nonprescription medication and bandaging on the first visit. Follow-up visits are restricted to observation, changing bandages or additional cleaning. (Most First-Degree burns require Medical Treatment.)

MEDICAL TREATMENT: Treatment includes a series of visits including soaks, whirlpool, and surgical debridement (cutting away dead skin). Most second and third degree burns require Medical Treatment.

SPRAINS AND STRAINS:
FIRST AID: Treatment is limited to soaking, application of cold compresses, and the use of elastic bandages on the first visit. Follow-up visit for observation only.

MEDICAL TREATMENT: Treatment includes a series of hot and cold soaks. Use of whirlpool, diatherapy treatments, or other professional treatments.

EYE INJURIES:
FIRST AID: Treatments are limited to irrigation, removal of foreign object not embedded in the eye, and application of nonprescription medication. Follow-up visits for observation only.

MEDICAL TREATMENT: Cases that involve removal of embedded foreign objects, used of prescription medication or other professional treatment.

INHALATION OF TOXIC OR CORROSIVE GASES:
FIRST AID: Treatments are limited to removal of the person to fresh air or the one-time administration of oxygen for several minutes.

MEDICAL TREATMENT: Any professional treatment beyond that mentioned under first aid and all cases involving the loss of consciousness.

(ALL CASES MUST BE RECORDED)

SECTION J - EARLY RETURN TO WORK PROGRAM (ERTW)

IMEDCO understands that an injured employee has the right to return to work in a manner that is consistent with doctor recommendations in a timeframe that is medically appropriate. This return to modified duties is a temporary transitional period designed to balance the needs of the employee and the employer.

Injured Employee Responsibilities

1. Reports injury right away to supervisor;
2. Completes all needed paperwork ASAP;
3. Maintains contact with employer;
4. Provides regular updates on health condition, treatment and medical status to employer's designee (e.g., Worker's Compensation coordinator, personnel manager, etc.), at least weekly;
5. Returns to modified duty that is within medical restrictions (if any) as set by doctor, as part of a rehabilitation program.
6. Return to modified duty must be accompanied by written approval/release waiver from doctor.

Manager/Supervisor/Designee Responsibilities

7. Conducts investigation and corrects hazard;
8. Completes all needed paperwork;
9. Maintains contact with injured worker and doctor for work restrictions
10. When feasible or appropriate, finds or develops modified work for employee, within restrictions;
11. Designee monitors recovery through incoming medical work restrictions and need for modified duty;
12. Identifies and offers modified duty assignment.

IMEDCO Responsibilities

13. Informs injured employee and manager/supervisor of rights and responsibilities under the Worker's Compensation law;
14. Maintains documentation and data on claims and trends;
15. Develop, where appropriate, modified duty assignment in other areas of the department.

Modified duty is a temporary assignment:

16. Employees must fully understand that this is temporary work, usually as a part of the rehabilitation program, and that they will be expected to return to their full job as soon as medically able.
17. It should be reviewed regularly by the supervisor and safety and personnel officers for continued appropriateness, in cooperation with the treating physician.
18. It should last no more than a few months for any one employee; each case will be evaluated on the nature of the injury.

Supervisors or other designated personnel need to work closely with the workers and his/her doctor to make sure the job tasks actually fit the medical limits. Workers in ERTW need close supervision and monitoring. They will be directed not to work outside of their restrictions, and fellow workers must know not to ask them to do so. Supervisors or other designated personnel need to monitor the entire system to make sure it's all working.

SECTION K – EMERGENCY ACTION PLAN

1. The project manager for each job will be responsible to generate a Site Specific Emergency Action Plan (Appendix H)
2. A medical facility will be designated by the project manager, and this information will be kept onsite.
3. The Emergency Coordinator identified in the Site Specific Emergency Action Plan will be an employee of the contract manager responsible for the applicable IMEDCO installation contract.
4. IMEDCO Site Superintendent will identify emergency exits, primary and secondary evacuation routes and fire alarm pull stations at the start of each job.
5. Site personnel should know at least two evacuation routes.
6. All IMEDCO employees will be familiar with the following Emergency Action Plan (EAP) detailing what actions to be followed in the case of emergency.
7. IMEDCO will maintain a record of employee orientation regarding the EAP

EMERGENCY ACTION PLAN

Types of emergencies to be reported by site personnel are:

- MEDICAL
- FIRE
- SEVERE WEATHER
- BOMB THREAT
- CHEMICAL SPILL

MEDICAL EMERGENCY

8. Contact medical emergency personnel by dialing 911:
9. Provide the following information:
    i) Nature of medical emergency.
    ii) Location of the emergency (address, building, room number).
10. Your name and phone number from which you are calling.
11. Do not move victim unless absolutely necessary.
12. If personnel trained in First Aid are not available, as a minimum, attempt to provide the following assistance:
13. Stop the bleeding with firm pressure on the wounds (note: avoid contact with blood or other bodily fluids).
14. Clear the air passages using the Heimlich Maneuver in case of choking.
15. In case of rendering assistance to personnel exposed to hazardous materials, consult the Material Safety Data Sheet (MSDS) and wear the appropriate personal protective equipment. Attempt first aid ONLY if trained and qualified.

FIRE EMERGENCY

16. When fire is discovered:
    i) Activate the nearest fire alarm (if installed)
    ii) Notify the local Fire Department by calling 911.
17. If the fire alarm is not available, notify the site personnel about the fire emergency by the following means (check applicable):
18. Fight the fire ONLY if:
    i) The Fire Department has been notified.
    ii) The fire is small and is not spreading to other areas.
    iii) Escaping the area is possible by backing up to the nearest exit.
    iv) The fire extinguisher is in working condition and personnel are trained to use it.
19. Upon being notified about the fire emergency, occupants must:
    i) Leave the building using the designated escape routes.
    ii) Assemble in the designated area (specify location):
    iii) Remain outside until the competent authority (Designated Official or designee) announces that it is safe to reenter.
20. Designated Official, Emergency Coordinator or <u>supervisors</u> must (underline one):

i) Disconnect utilities and equipment unless doing so jeopardizes his/her safety.
ii) Coordinate an orderly evacuation of personnel.
iii) Perform an accurate head count of personnel reported to the designated area.
iv) Determine a rescue method to locate missing personnel.
v) Provide the Fire Department personnel with the necessary information about the facility.
vi) Perform assessment and coordinate weather forecast office emergency closing procedures

21. Area/Floor Monitors must:
    i) Ensure that all employees have evacuated the area/floor.
    ii) Report any problems to the Emergency Coordinator at the assembly area.
22. Assistants to Physically Challenged should:
    i) Assist all physically challenged employees in emergency evacuation.

CHEMICAL SPILL

23. When a Large Chemical Spill has occurred:
    i) Immediately notify the designated Emergency Coordinator designated in the Site Specific Emergency Action Procedures.
    ii) Secure the area and alert other site personnel.
    iii) Do not attempt to clean the spill unless trained to do so.
    iv) Attend to injured personnel and call the medical emergency number, if required.
    v) Evacuate building as necessary

24. When a Small Chemical Spill has occurred:
    i) Notify the Emergency Coordinator and/or supervisor (select one).
    ii) If toxic fumes are present, secure the area (with caution tapes or cones) to prevent other personnel from entering.
    iii) Deal with the spill in accordance with the instructions described in the MSDS.
    iv) Small spills must be handled in a safe manner, while wearing the proper PPE.
    v) Review the general spill cleanup procedures.

PROCEDURE FOR HANDLING BOMB THREATS

The purpose of this plan is to provide an outline of the basic requirements to take should there be a report of a bomb being placed on any company work site. The decisions of whom to call, clearing the area, and search procedure will be determined by the Project Manager and/or Owner of site, who will give direction and procedures to follow at the work location.

In most cases, the bomb threat will be received by phone. The following procedure should be followed to obtain information:

25. Keep the caller on the line as long as possible. Ask them to repeat the message and write down every word.
26. Listen to the voice (male, female, adult, and child) quality (calm, excited) and any accents or speech impediments. As soon as the caller hangs up, report to the Project Manager for further action to be taken.
27. Take special note of all background noises (music, motors, equipment, traffic, or any noises) that may give a clue as to where the call is being made.
28. Try to get the caller to give the location and the time of detonation.
29. Tell the caller that the area is occupied and the bomb being detonated would result in death and injury of several innocent people.
30. Treat all bomb threats seriously; never consider a threat to be a prank.

After the proper law enforcement agency has been notified, the company officers will be notified.

If directed to evacuate the job site by local authorities, client's management or company management, try to direct an orderly evacuation by area.

If a bomb threat is received through the mail, the envelope as well as the message should be saved for the proper authorities. Extra care should be taken to prevent smearing any fingerprints that they might contain.

SEVERE WEATHER AND NATURAL DISASTERS

Tornado:

31. When a warning is issued by sirens or other means, seek inside shelter. Consider the following:
    i) Small interior rooms on the lowest floor and without windows,
    ii) Hallways on the lowest floor away from doors and windows, and
    iii) Rooms constructed with reinforced concrete, brick, or block with no windows.
    iv) Stay away from outside walls and windows.
    v) Use arms to protect head and neck.
    vi) Remain sheltered until the tornado threat is announced to be over.

Earthquake:

32. Stay calm and await instructions from the Emergency Coordinator or the designated official.
33. Keep away from overhead fixtures, windows, filing cabinets, and electrical power.
34. Assist people with disabilities in finding a safe place.
35. Evacuate as instructed by the Emergency Coordinator and/or the designated official.

Flood:

36. If indoors:
    i) Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
    ii) Follow the recommended primary or secondary evacuation routes.

37. If outdoors:
    i) Climb to high ground and stay there.
    ii) Avoid walking or driving through flood water.
    iii) If car stalls, abandon it immediately and climb to a higher ground.

Hurricane*:*

38. The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane watch issued when a hurricane becomes a threat to a coastal area. A hurricane warning is issued when hurricane winds of 74 mph or higher, or a combination of dangerously high water and rough seas, are expected in the area within 24 hours.
39. Once a hurricane watch has been issued:
    i) Stay calm and await instructions from the Emergency Coordinator or the designated official.
    ii) Continue to monitor local TV and radio stations for instructions.
    iii) Move early out of low-lying areas or from the coast, at the request of officials.
    iv) If you are on high ground, away from the coast and plan to stay, secure the building, moving all loose items indoors and boarding up windows and openings.
    v) Collect drinking water in appropriate containers.
40. Once a hurricane warning has been issued:
    i) Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
    ii) Leave areas that might be affected by storm tide or stream flooding.
41. During a hurricane:
    i) Remain indoors and consider the following:
    ii) Small interior rooms on the lowest floor and without windows,
    iii) Hallways on the lowest floor away from doors and windows, and
    iv) Rooms constructed with reinforced concrete, brick, or block with no windows.

Blizzard:

42. If indoors:
    i) Stay calm and await instructions from the Emergency Coordinator or the designated official.
    ii) Stay indoors!
    iii) If there is no heat:
        (1) Close off unneeded rooms or areas.
        (2) Stuff towels or rags in cracks under doors.
        (3) Cover windows at night.
        (4) Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
        (5) Wear layers of loose-fitting, light-weight, warm clothing, if available.

43. If outdoors:
    i) Find a dry shelter. Cover all exposed parts of the body.
    ii) If shelter is not available:
        (1) Prepare a lean-to, wind break, or snow cave for protection from the wind.
    iii) Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.
    iv) Do not eat snow. It will lower your body temperature. Melt it first.

44. If stranded in a car or truck:
    i) Stay in the vehicle!
    ii) Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
    iii) Make yourself visible to rescuers.
    iv) Turn on the dome light at night when running the engine.
    v) Tie a colored cloth to your antenna or door.
    vi) Raise the hood after the snow stops falling.
    vii) Exercise to keep blood circulating and to keep warm.

SECTION L - COMPANY SECURITY PROCEDURE

At certain locations, the Project Manager will have the responsibility of initiating and enforcing job site security for the company as well as subcontractors. This procedure is a general guide in implementing such a program to prevent or reduce losses due to theft or vandalism. The four major concerns are:

1. Theft by either employees/subcontractors or by the public resulting in loss of time and material in replacing said losses.
2. Vandalism by employees/subcontractors, ex-employees, local gangs, or children. Costs of rework or replacement said losses.
3. Fire by arson or accident resulting from vandals, vagrants, or children. Again, loss of time and materials is costly.
4. Attractive nuisance resulting in death or injury to children who wonder onto unprotected construction sites, which result in lawsuits.

To protect or prevent these costly situations from occurring the following precautions should be taken:

5. Based on your specific job, your location and problems encountered by other contractors in the area, decisions will have to be made regarding total or partial fencing, type of fence, lighting, security service, or local hire of watchmen and the practicality of an alarm system.
6. A specific area should be set up for equipment and material storage when possible, with added protection for these areas. Arrival of equipment on site should be scheduled as needed and unused equipment or materials removed when it is no longer needed.
7. Parking areas for employees and visitors should be set up with control of on-site vehicle entry, exit, and parking being regulated. Stickers or passes may be used for visitors, vendors, job applicants, overtime and early reporting of any company or subcontractor personnel.
8. Property or materials passes for tools, equipment, or materials of individuals or companies is recommended.
9. All company employees as well as all subcontractors should be instructed in the Site Security Plan and the following should not be allowed on the site:
   i) Smoking in posted areas only.
   ii) Narcotics or intoxicants or persons under their influence.
   iii) Gambling or bringing gambling materials on site.
   iv) Firearms or any weapon.
   v) Creating a disturbance.
   vi) Destroying or removing, without permission any property belonging to the owner, subcontractors, the contractor or other employees
   vii) Sleeping on the job.
   viii) Speeding on site.
   ix) Open fires or fire barrels.
   x) Taking materials, tools, or equipment without pass.
   xi) Refusing to show identification as requested.
   xii) Refusing a search of self, containers or vehicle if posted and required for site.
   xiii) Unauthorized or improper use of parking facilities, lunch or change room and any other site approved area of equipment.

For the protection of equipment, materials and tools, the following precautions should be taken:

10. All equipment, materials, and tools should be inventoried and recorded as it comes on the site. When possible, take down serial or other identification numbers and identify each article. The use of paint, company name, or logo is very helpful in identifying our property. When possible, always put identifying marks on same general area, for easier recognition. Do not assume you are the only contractor on site that used a certain piece of equipment, tools, or materials.
11. Keep all tools securely locked in storage trailers, sheds, or large toolboxes. Use only high quality locks and set up a key control program.
12. Have a checkout or assignment system for all tools and equipment.
13. Lock up all equipment cabs and/or disable them when possible during non-working hours. Use locks on storage oil or gas tanks if practical or required. Locking covers or lids can be purchased or job made for operating levers, handles, switches or control boxes.
14. Carefully supervise all trash and/or material removed from the job. This not only prevents theft but it protects from accidental discarding of usable tools and materials.

Again, it must be stressed that this program in no way includes all the problems you may encounter in establishing site security. Other resources are:

15. Hire a local security service to survey your site and offer professional recommendations and suggestions
16. Contract a professional security service to provide the plan
17. In some instances, the Owner or client will establish and maintain the security service.

SECTION M - IMEDCO PERSONNEL SAFETY RULES

The IMEDCO Safety Rules below must be adhered to by all employees. Supervisory personnel must become intimately familiar with the rules and enforce them. In addition to these Company rules, some jobs will require that other specific rules be observed and enforced.

Unless otherwise specified by contract, the work subcontracted, the subcontractor is responsible for implementation of all safety requirements set forth in this manual on all work under his control until turned over to, and accepted by IMEDCO. The Project Manager, Superintendent, and Safety Director shall place particular emphasis on enforcing compliance with requirements in all sections of this manual. We at IMEDCO are not only concerned with OSHA inspection, insurance liability, and lawsuits but our biggest concern is the health and welfare of all people. The General Contractor is responsible for all safety regulations on the site.

During orientation, new employees shall be provided a copy of the rules, and be required to sign and acknowledge the receipt of the rules.

Safety Rules are the result of experience. Accidents happen suddenly, without warning and unexpectedly. Listed below are the basic job site rules that you, the worker, will be expected to follow when you work on the site.

1. All our Safety Rules must be obeyed.
2. All injuries must be reported to your Site Superintendent and treated at once.
3. Report all unsafe acts or conditions noted to the Site Superintendent that you are unable to correct immediately.
4. If there is something about your work you do not understand, ask the Site Superintendent.
5. A good job is a clean job and a clean job is a safe job. Take pride in your work and your work area.
6. Firearms on the job are not permitted.
7. No narcotic or intoxicant or persons under their influence will be allowed on the site.
8. Gambling or bringing gambling materials on the site is prohibited.
9. Sleeping on the job is prohibited.
10. Horseplay is strictly prohibited on the site.
11. Use designated entrances and exits as assigned by your employer.
12. Riding on the top of loads, fenders, end gates, slides of trucks or with your legs dangling over the end or side of trucks is strictly prohibited.
13. Riding any equipment or materials being hoisted is prohibited.
14. Pay attention to signs and barricades, as they are there for your protection.
15. Never oil, lubricate or fuel equipment or machinery while it is running.
16. When you work around equipment, stay in sight of the operator.
17. Keep out of trenches or cuts that have not been properly sloped or shored.
18. Do not enter a confined or enclosed space unless it has been checked for oxygen deficiency and/or flammable or toxic gas.
19. All electrical cords and welding leads will be elevated or otherwise protected where possible.
20. Open fires or fire barrels are prohibited. Use only approved electrical, fuel or gas heaters. No job made heaters.
21. Never use defective tools or equipment. Keep them in good condition.
22. Fighting on the site is prohibited.
23. Failure to use or misuse of sanitary facilities as well as other site facilities provided is not permitted.
24. Operating motor vehicles or equipment on site in an unsafe manner, as well as misuse of the parking lot or your parking privileges, may result in your driving on-site or parking privileges being revoked or suspended.
25. No one will remove, displace, damage, destroy or carry off any safety device or safeguard furnished or provided for use on the job.
26. Refusing to submit to self, lunch box, toolbox, vehicle, or any other inspection (if applicable) may result in disciplinary action, including discharge.
27. Anyone failing or neglecting to obey order or regulations related to the safety and security may be subject to immediate disciplinary actions.

28. You must maintain the reputation of IMEDCO on a job out of town. Even while not on the "clock" you are being seen by the public eye. Many place we do business is in small towns or areas. If your conduct is unacceptable, it will be reported to IMEDCO. This may very well effect your position with IMEDCO.
29. Operating IMEDCO vehicles under the influence of alcohol or any illegal substance is strictly prohibited. Failure to comply will result in termination.

SIGNS

30. All gates and other entrances shall be posted with signs warning the public that construction work is underway and that unauthorized entry to the job site is prohibited.
31. Areas adjacent to the gate where construction vehicles are entering and leaving the jobsite shall be posted with signs warning the public to watch out for trucks and other vehicles.
32. Where blind spots may exist for pedestrians or motorist along fences, under canopies, at approaches to driveways or gates where construction vehicles are entering or leaving the jobsite, appropriate warning signs shall be posted to warn the public of the hazard.

SECTION N - HAZARD COMMUNICATION PROGRAM

PURPOSE

The purpose of this plan is to establish a program and procedures for the safe use of hazardous chemical substances at IMEDCO America .

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200 (General Industry) and 29 CFR 1926.59 (Construction Industry) call for the development of a hazard communication program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012. The written hazard communication program will include and address the following criteria in order to satisfy the minimum requirements of the OSHA HCS 2012:

1. List of all hazardous chemicals known to be present in the workplace or individual work area
2. Methods used to ensure that all containers, including pipes and holding tanks, are labeled, tagged or marked properly
3. Methods used to obtain and maintain safety data sheets (SDSs)
4. Methods used to provide employees with information and training on hazardous chemicals in their work areas
5. Methods used to inform employees of the hazards of nonroutine work practices
6. Methods used to provide the employees of other employers (e.g., consultants, construction contractors and temporary employees) on-site access to SDSs for each hazardous chemical that the other employer's employees may be exposed to while working in the workplace
7. Methods used to inform the employees of other employers of precautionary measures that need to be taken to protect themselves during the workplace's normal operating conditions and in foreseeable emergencies
8. Methods used to inform the employees of other employers of the labeling system used in the workplace

The hazard communication program will identify the following:

9. Key personnel responsible for the program
10. Location of chemical inventory list and SDSs
11. Workplace labeling system
12. Good work practices and procedures to minimize exposures
13. How training will be performed
14. Procedures to maintain the program and update the required information
15. How records will be maintained

Safety Coordinator

The safety coordinator, Matt Krachon, is responsible for administering the hazard communication program.

This person is also responsible for:

1. Reviewing the potential hazards and safe use of chemicals
2. Maintaining a list of all hazardous chemicals and a master file of SDSs
3. Ensuring that all containers are labeled, tagged or marked properly
4. Providing new-hire and annual training for employees
5. Maintaining training records
6. Monitoring the air concentrations of hazardous chemicals in the work environment
7. Properly selecting and caring for personal protective equipment
8. Directing the cleanup and disposal operations of the spill control team
9. Identifying hazardous chemicals used in nonroutine tasks and assessing their risks
10. Informing outside contractors who are performing work on company property about potential hazards
11. Reviewing the effectiveness of the hazard communication program and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements

Purchasing Agent
The purchasing agent, Alex Lanz, is responsible for:

12. Contacting chemical manufacturers and/or distributors to obtain SDSs and secondary labels for hazardous chemicals used or stored in the workplace

Receiving Department
The receiving department is responsible for:

13. Reviewing incoming hazardous chemicals to verify correct labeling
14. Holding hazardous chemicals in the receiving area until receipt of the SDS for the product

Employees
Employees are responsible for the following aspects of the hazard communication program:

15. Identifying hazards before starting a job
16. Reading container labels and SDSs
17. Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers
18. Using controls and/or personal protective equipment provided by the company to minimize exposure
19. Following company instructions and warnings pertaining to chemical handling and usage
20. Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement
21. Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
22. Participating in training

CHEMICAL INVENTORY LIST
Attached to this program is a list of hazardous chemicals used, produced and/or stored at IMEDCO America. Copies of the chemical inventory list are available in the Safety program.

This list will contain the product identifier that is referenced on the appropriate SDS, the location or work area where the chemical is used, and the personal protective equipment and precautions for each chemical product. This list will be updated annually and whenever a new chemical is introduced to the workplace.

LABELS AND OTHER FORMS OF WARNING
Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

1. Product identifier
2. Signal word
3. Hazard statement(s)
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address and telephone number of the chemical manufacturer, importer or other responsible party

IMEDCO America will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

7. Product identifier
8. Signal word
9. Hazard statement(s)
10. Pictogram(s)
11. Precautionary statement(s)

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label. If the portable container will be used by more than one employee or used over the course of more than

one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the entire area will be labeled with a warning placard.

Pipes that contain hazardous chemicals should be labeled in accordance with ANSI/ASME A13.1 and indicate the direction of flow. (Please note that this not a requirement of the OSHA HCS but a best practice or requirement of local jurisdiction.)

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift. If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

Note: After Dec. 1, 2015, distributors may not ship containers labeled by the chemical manufacturer or importer unless the label on the container meets GHS labeling requirements.

SAFETY DATA SHEETS

An SDS will be obtained and maintained for each hazardous chemical in the workplace. SDSs for each hazardous chemical will be readily accessible during each work shift to employees when they are in their work areas.

SDSs will be obtained from the chemical manufacturer, importer or distributor. The name on the SDS will be the same as that listed on the chemical inventory list. SDSs for chemicals or process streams produced by the company will be developed and provided by the safety coordinator.

The safety coordinator will maintain the master file of all original SDSs. Hard copies of the master file will be located in Matt Krachon office and in all gang boxes.

SDSs for new products or updated SDSs for existing products will be obtained by the purchasing agent and forwarded to the safety coordinator. The safety coordinator will then update the master file with new and/or updated SDSs.

If problems arise in obtaining an SDS from the chemical manufacturer, importer or distributor, a phone call will be made to request an SDS and to verify that the SDS has been sent. The phone call will be logged and a letter will be sent the same day. The company will maintain a written record of all efforts to obtain SDSs. If these efforts fail to produce an SDS, the local OSHA office will be contacted for assistance.

EMPLOYEE INFORMATION AND TRAINING

Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:

1. Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry)
2. Operations in the work area where hazardous chemicals are present
3. Location and availability of the hazard communication program, chemical inventory list and SDSs
4. Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released

5. Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
6. Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used
7. Explanation of the labels received on shipped containers
8. Explanation of the workplace labeling system
9. Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information

Note: To facilitate understanding of the new GHS system, the OSHA HCS requires that employees be trained regarding the new label elements and SDS format by Dec. 1, 2013. Employers are required to update the hazard communication program and to provide any additional training for newly identified physical or health hazards no later than June 1, 2016.

Nonroutine Tasks

The safety coordinator and the immediate supervisor of an employee performing a nonroutine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the nonroutine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the nonroutine task will be performed.

Special work permits are required for the performance of certain nonroutine tasks, such as entry to confined spaces, breaking and opening piping systems, and welding and burning. For some special tasks, employees are required to follow special lockout/tagout procedures to ensure that all machinery motion has stopped and energy sources are isolated prior to and during the performance of such tasks.

Contractors

Prior to beginning work, the safety coordinator will inform contractors with employees working on company property of any hazardous chemicals that the contractors' employees may be exposed to while performing their work. The safety coordinator will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractors' employees, and any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, the safety coordinator will advise contractors that they must comply with all OSHA standards while working on company property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the contractor and that company operations do not expose contractors' employees to hazards.

The safety coordinator will inform contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' employees may be exposed while performing their work.

Recording

Records pertaining to the hazard communication program will be maintained by the safety coordinator. The safety coordinator will keep the following records:

1. Chemical inventory list
2. Hazardous material reviews
3. Copies of phone call logs and letters requesting SDSs
4. Employee training records
5. Warnings issued to employees for not following the hazard communication program

I, _____ have read and understand the hazard communication program at IMEDCO America

Employee Name: _____ Date: _____

Objectives

IMEDCO America Ltd's. policy is to implement the various requirements of the Chemical Hazardous Communication Regulation as required by the U. S. Department of Labor Occupational Safety and Health Administration.

This document defines the program that has been developed to comply with OSHA, which requires that employees be made aware of the potential hazards associated with materials in the workplace.

References

A) OSHA 29CFR 1910.1200, Hazard Communication, General Industry.
B) OSHA 29CFR 1926.59, Hazard Communication, Construction.
C) OSHA 29CFR 1910.SUBPART Z, Toxic, and Hazardous Substances.
D) NIOSH/OSHA DHEW Publication No. 78-210, Pocket Guide to Chemical Hazards
E) Associated General Contractors American, Dallas, Texas

Definitions

Hazardous Chemical - means any chemical that is a physical hazard or a health hazard.

Health Hazard - means a chemical for which there is statistically significant evidence that acute or chronic effect may occur in exposed employee

6. Health Hazards
    i) Carcinogen
    ii) Corrosive
    iii) Irritant
    iv) Sensitizer
    v) Toxic
    vi) Chemicals affecting Specific organs, e.g., liver

Physical Hazard - means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, and explosive or flammable materials.

7. Physical Hazards
    i) Combustible or flammable liquids
    ii) Compressed Gas
    iii) Explosive
    iv) Organic Peroxide
    v) Oxidizer
    vi) Pyrophoric (ignites spontaneously in air at or below 130 degrees)
    vii) Unstable
    viii) Water-reactive
8. The Hazardous chemical list should contain the following information:
9. The chemical name and common name used in the container label and the Material Safety data Sheet.
10. The manufacture's name, address, and telephone number.
11. The work area in which the chemical is used or stored.
12. Data MSDS were requested or received.

Responsibility

It shall be the responsibility of the jobsite Project Manager/Superintendent to identify the hazardous substance in use in the jobsite and prepare a perpetually maintained listing of the substance. This list shall be checked against Reference (2), papa. 2.0, or other sources recognized by OSHA to determine that the substances are classified as hazardous.

At the request of the Project Manager/Superintendent, subcontractors shall be required to provide a listing of all hazardous materials under the subcontractor's control.

The hazardous materials list shall be maintained current by the following actions:

1. Purchasing personnel shall request a MSDS for every chemical, which is requisitioned.

2. When it is determined that a new hazardous material is to be used on the jobsite, the new substance will be added to the list.
3. The Project Manager/Superintendent shall require that subcontractor's management supply information when a new hazardous substance is brought on the job. Subcontractor's shall keep their own hazardous communication information on the jobsite, and be responsible for maintaining the information.
4. As hazardous substances are permanently depleted or removed from the jobsite, the Project Manager/Superintendent shall remove those items from the active listing.
5. Examples: If a particular substance that is on the listing and that work has been completed and the substance is removed, it will be deleted from the listing. Likewise, if a chemical is used on the jobsite for particular phase of the work (e.g. cleaning solvent for high voltage terminations) and the substance is no longer needed, it shall be disposed of and the item removed from the active listing.

When acting as a subcontractor or worker on a jobsite is under the control of the General Contractor or Construction Manager, the Project Manager/Superintendent shall request MSDS's from the General Contractor or Construction Manager or arrange for employees to have access to other contractor's MSDS files, as applicable, and to take a part in the hazard training provided by the individual contractors.

MATERIAL SAFETY DATA SHEETS

Definition: MSDS is the abbreviation used to identify a Material Safety Data Sheet. A MSDS is a document, which supplies information about a particular hazardous chemical.

1. The MSDS must provide information on the physical and chemical characteristics of the hazardous chemical, known acute and chronic health effects and related health information, exposure limits, whether the chemical is considered to be a carcinogen by NTP, IARC, or OSHA, precautionary measures, emergency and first aid procedures, and the identification of the organization responsible for preparing the sheet, including name, address, and telephone number.
2. Access to Information:
   i) This written Hazard Communication Program is available, upon request, to employees, their designated representative, etc., (Collective Bargaining Agent.)
   ii) Copies of MSDS for all hazardous substances to which employees of this company may be exposed are kept in the field office. The field office and the superintendent will be responsible for obtaining and maintaining the data sheet system for the company.
   iii) The Superintendent will review incoming data sheets for new and significant health/safety information. He will see that any new information is passed on to the affected employees and all subcontractors on the jobsite.
   iv) If a MSDS is missing or obviously incomplete, a new MSDS will be requested from the manufacture.

Chemical manufactures are required to provide MSDS's to users of the chemicals. A blank MSDS is shown as Exhibit No. 1 for familiarization and training purposes.

For each hazardous substance shown on the listing prepared as described above, the Purchasing Agent, Project Manager/Superintendent, as applicable, shall coordinate to obtain an MSDS to be used for information and training of personnel, and for reference information for subcontractors when applicable.

3. MSDS's for hazardous substance purchased by personnel will be requested from the vender or other source from which purchased.
4. MSDS's for hazardous substances brought to the jobsite by subcontractors will be requested from the subcontractor.
5. In certain situations, where there is no fixed jobsite, such as in servicing operations, MSDS's may be retained in a central location, providing that the information is readily available by telephone, computer terminal, etc., in the event of an emergency.

Labeling

6. Definition: Material received at the jobsite shall be properly labeled. If labels are not provided, contact the supplier for specific labels. Information contained on labels must not conflict with federal, state, or local laws and/or regulations in labeling requirements. These labels should provide the following:
   i) Identity of the chemical product or substance in the container.
   ii) Hazard warnings.
   iii) Name, address and telephone number of the manufacture or other responsible party.
   iv) Targeted organs affected by chemical.

7. The Project Manager/Superintendent shall ensure that containers of hazardous substance on the job are labeled with the identity of the substance and with appropriate words (English language), picture, or symbols to convey a warning of the health and physical hazards of the substance.
8. Use of labels:
   i) The label must not be removed and should be replaced if illegible.
   ii) All containers of chemical product, including laboratory bottles, solvents, cans, and dispensers must be labeled. For smaller containers (less than one gallon or 3.7 liters), labels must be consistent with the standards that are specified above. Only those chemicals that can be classified as "immediate use," are exempt from the labeling procedure above.
   iii) Labeling is not required for small portable containers into which hazardous chemicals are transferred from a labeled container, and which are intended only for the immediate use by the employee who transfers the substance. However, the Project Manager/Superintendent must closely monitor work activities to assure that portable containers are not left unattended or handled in such a manner as to create an undue hazard.
   iv) Immediate use is defined as the hazardous chemicals under control of and used by the person who transfers it from the labeled container and only within the work shift in which it is transferred.
   v) In storage areas where similar chemical products are stored, signs and/or placards must be posted to identify the material and transmit the required information in lieu of individual container labels.
   vi) If any materials are to be transferred from a storage tank or container through a pipeline, labels with the required information will be affixed to the line at the discharge point (valve).
   vii) In those cases where a chemical product other than that specified on the container label is placed if the container, re-label the container to accurately reflect the hazards of the chemical product that has been substituted.

TRAINING

The contents of this program shall be conveyed to affected employees. Employees shall be made aware of any operations in their work area where hazardous chemicals are present, where the hazardous chemicals listing are maintained, and the procedure for obtaining MSDS information.

Training of employees may be by classroom or group. However, based on work schedules, job peculiarities, etc., the training requirements can be met if each employee reads the contents of this program and is given an opportunity to present questions and receive program, and is given an opportunity to present questions and receive answers concerning the program. New employees should receive answers and training on the program as soon as they report to work.

The Project Manager/Superintendent shall assign personnel to conduct training of employees. Personnel performing training functions shall maintain accurate records of all personnel trained including dates of training, subjects covered, and personnel attending.

Employee Training:

1. Employees are to attend a new employee health and safety orientation, or toolbox meeting set up by the Superintendent, prior to starting work for information and training on the following:
   i) An overview of the requirements contained in the Hazard Communication Regulation, including their rights under the Regulation.
   ii) Inform employees of any operation in their work area where hazardous chemicals are present.
   iii) Location and availability of the written Hazardous Communication Program.

iv) Physical and health effects of the hazardous chemicals.
v) Methods and observation techniques used to determine the presence of or the release of hazardous chemicals in the work area including lead and asbestos.
vi) How to lessen or prevent exposure to these hazardous substances through usage or engineering controls, work practices, and/or the use of personal protective equipment.
vii) Steps the company has taken to lessen or prevent exposure to these chemicals.
viii) Emergency and first aid procedures to follow if employees are exposed to hazardous substance(s).
ix) How to read labels and review MSDS to obtain appropriate hazard information.
x) Inform all employees of the IMEDCO disciplinary policy.
xi) Have each employee trained in the above, and sign the Employer Acknowledgment Form.
xii) Conduct an annual review of The Hazardous Communication Program with all employees and maintain a record of theses in attendance.

NOTE: It is critically important that all employees understand the training. Contact the Project Superintendent with any additional questions.

2. When new hazardous chemicals are introduced, the superintendent will review the above item as they relate to the new chemical in a safety meeting.
3. General Contractor/ Subcontractor Responsibilities
   i) Access of information by other employers - When employees of a subcontractor may be exposed to hazardous chemicals while working on the jobsite, the General Contractor shall provide a list of the hazardous chemicals being used at that jobsite by the appropriate company's superintendent and make available the applicable MSDS sheets for all required protective measures.
   ii) Likewise, it shall be the responsibility of all subcontractors to provide the appropriate MSDS's to the General Contractor for all hazardous chemicals being used by their company at the jobsite.
   iii) When exposure to a hazardous chemical is expected, employers are responsible for the appropriate training of their employees.
   iv) If requested, name, address, and telephone number of the suppliers or manufacturers of the hazardous chemicals being used shall be provided.
4. Non-Routine Task Training:
   i) Periodically, employees are required to perform hazardous non-routine task prior to starting work on such projects. Each affected employee will be given information by his supervisor about chemical hazards to which the employee may be exposed during such an activity.

Record Keeping - (at the jobsite)

1. Safety Data Sheets can also be obtained through a link available on our website.
2. Hazardous Chemical List.
3. Records of employee training and employee acknowledgment copies.
4. Records of any employee accidental over-exposure to hazardous chemicals.
5. Records of any environmental testing.

CERTIFICATE OF LIABILITY INSURANCE

Not included in this electronic document is the actual certificate of liability insurance for specified job. These have not yet been translated into electronic format.

OSHA® QUICK CARD™

Hazard Communication Safety Data Sheets

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

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

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

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

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

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

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

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

(Continued on other side)

For more information:

OSHA® Occupational Safety and Health Administration

U.S. Department of Labor

www.osha.gov (800) 321-OSHA (6742)

OSHA 3493-02 2012

OSHA® QUICK CARD™

Hazard Communication Safety Data Sheets

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

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

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

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

Section 12, Ecological information*
Section 13, Disposal considerations*
Section 14, Transport information*
Section 15, Regulatory information*

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

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 (29 CFR 1910.1200(g)(2)).

Employers must ensure that SDSs are readily accessible to employees.
See Appendix D of 29 CFR 1910.1200 for a detailed description of SDS contents.

For more information:

OSHA® Occupational Safety and Health Administration

U.S. Department of Labor

www.osha.gov (800) 321-OSHA (6742)

OSHA 3493-02-2012

OSHA® QUICK CARD™

Hazard Communication Standard Pictogram

As of June 1, 2015, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

HCS Pictograms and Hazards

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

For more information:

OSHA® Occupational Safety and Health Administration

U.S. Department of Labor

www.osha.gov (800) 321-OSHA (6742)

OSHA® DATOS RÁPIDOS

Pictograma para la norma sobre la comunicación de peligros

A partir del 1.° de junio de 2015, la norma de comunicación de peligros (HCS, por sus siglas en inglés) exigirá pictogramas en las etiquetas para advertir a los usuarios de los peligros químicos a los que puedan estar expuestos. Cada pictograma representa un peligro definido y consiste en un símbolo sobre un fondo blanco enmarcado con un borde rojo. La clasificación del peligro químico determina el pictograma que muestra la etiqueta.

Pictogramas y peligros según la HCS

Peligro para la salud  • Carcinógeno • Mutagenicidad • Toxicidad para la reproducción • Sensibilización respiratoria • Toxicidad especifica de órganos diana • Peligro por aspiración	**Llama**  • Inflamables • Pirofóricos • Calentamiento espontáneo • Desprenden gases inflamables • Reaccionan espontáneamente (autorreactivas) • Peróxidos orgánicos	**Signo de exclamación**  • Irritante (piel y ojos) • Sensibilizador cutáneo • Toxicidad aguda (dañino) • Efecto narcótico • Irritante de vías respiratorias • Peligros para la capa de ozono (no obligatorio)
Botella de gas  • Gases a presión	**Corrosión**  • Corrosión o quemaduras cutáneas • Lesion ocular • Corrosivo para los metales	**Bomba explotando**  • Explosivos • Reaccionan espontáneamente (autorreactivas) • Peróxidos orgánicos
Llama sobre círculo  • Comburentes	**Medio ambiente** (No obligatorio)  • Toxicidad acuática	**Calavera y tibias cruzadas**  • Toxicidad aguda (mortal o tóxica)

Para más información:

OSHA® Administración de Seguridad y Salud Ocupacional

Departamento de Trabajo de los EE. UU.

www.osha.gov (800) 321-OSHA (6742)

OSHA® DATOS RÁPIDOS

Etiquetas para la norma sobre la comunicación de peligros

De acuerdo con su norma de comunicación de peligros (HCS, por sus siglas en inglés), la OSHA ha actualizado los requisitos para las etiquetas de los productos químicos peligrosos. A partir del 1.° de junio de 2015, se exigirá que todas las etiquetas incluyan pictogramas, una palabra de advertencia, indicaciones de peligro, consejos de prudencia, identificación del producto y la identificación del proveedor. A la derecha se presenta la muestra de una etiqueta modificada de acuerdo con la HCS, que indica los elementos obligatorios. La etiqueta puede contener también información suplementaria según sea necesario.

Para más información:

OSHA® Administración de Seguridad y Salud Ocupacional
(800) 321-OSHA (6742)
www.osha.gov

Appendix A – Reporting Procedure

In case of reporting, follow this procedure:

- Call the Division Office in Noblesville, IN at 317-773-8500

- Send the report by fax to 317-773-8508

- Mail one copy to the following address:
  Imedco America LTD.
  1730 E. Pleasant St.
  Noblesville, IN 46060

- Keep one copy on file

- If it is after regular office hours, Monday-Friday 8:30AM-5PM, contact the following persons:
- Alex Lanz 317-698-8391
- Mike Krachon 317-627-6503
- Matt Krachon 317-435-3353
- Chuck Capps 317-628-1976
- Matt Krachon 317-417-3639

Appendix B – Random Safety Inspection by Safety Director

I. Location	YES	NO
1. Is a copy of the IMEDCO Safety Program on file at the job?	(___)	(___)
2. Are weekly safety inspection reports on file?	(___)	(___)
II. Job Office		
1. Is a copy of the IMEDCO Safety Program on file at the job?	(___)	(___)
2. Are weekly safety inspection reports on file?	(___)	(___)
III. Facilities		
1. Is an appropriate first aid kit on the job site and appropriately supplied?	(___)	(___)
2. Are Fire Extinguishers present at the site.	(___)	(___)
IV. Site		
1. Are hard hats being worn by all workers?	(___)	(___)
2. Is Project generally clean and orderly?	(___)	(___)
3. Is equipment being operated in a safe manner?	(___)	(___)
4. Does the project site look like a place you would feel safe to work in?	(___)	(___)

PLEASE BRING ANY DEFICIENCIES DESIGNATED BY A NO ANSWER TO YOUR SITE SAFETY SUPERVISORS ATTENTION.

SIGNED: _____
DATE: _____

Appendix C – Random Safety Inspection Non Compliance Form

Date_____

Location: Job Site_____ Shop_____ Office_____

Project Name_____ Project #_____

Person Reporting_____

Person in Non-Compliance_____

Description of Non-Compliance

_____
_____
_____
_____
_____

Corrective Action

_____
_____
_____
_____
_____

Reporting Person's Signature_____ Date_____

Employee's Signature_____ Date_____

Supervisor's Signature_____ Date_____

Safety Director's Signature_____ Date_____

Appendix D – Weekly Safety Checklist for Site Safety Supervisors

I. Job office

1. Is a copy of The IMEDCO Safety Program on file at job site? (___) (___)
2. Are Proper forms and procedures for reporting accidents in file? (___) (___)
3. Are weekly safety inspections reports in file? (___) (___)
4. Is an accident file with reporting forms on hand? (___) (___)

II. Facilities

1. Is an appropriate first aid kit on the job site and properly supplied? (___) (___)
2. Is a trained "First Aid" on the project? (___) (___)
3. Is a list of emergency numbers and names posted? (___) (___)

III. Site

1. Are hard hats being worn by all workers? (___) (___)
2. Are PPE being furnished to workers? (___) (___)
3. Are workers using PPE? (___) (___)
4. Is project generally clean and orderly? (___) (___)
5. Are all materials stored securely and out of the way? (___) (___)
6. Are ladders, stairs and inclines clear and in good condition? (___) (___)
7. Are aisles and walkways kept clear? (___) (___)
8. Is good illumination of work areas, walkways and stairs provided? (___) (___)
9. Is ventilation of work areas adequate? (___) (___)
10. Are al ladders and scaffolds properly secured and meet required standards? (___) (___)
11. Are scaffolds adequate for loads being placed on them? (___) (___)
12. Are proper and safe hand tools available? (___) (___)
13. Are safety precautions being taken with all equipment in use? (___) (___)

SIGNED: _____
DATE: _____

Appendix E - New Hire Safety Orientation CHecklist

EMPLOYEE NAME: _____ SUPERVISOR : _____

POSITION_____ DATE:_____

SUP INITIALS

1. Emergency Procedures

a. Emergency phone numbers / how to report emergencies _____
b. Hazardous Communications Program _____
c. Fire Extinguisher Usage _____
d. First Aid _____
e. Blood borne Pathogen Awareness _____

2. Injury/Accident Prevention

a. Reporting to supervisor (during / after hours) _____
b. Getting Treatment (during / after hours) _____
c. Accident Reporting Procedure _____
d. Near Miss Reporting Procedure _____

3. IMEDCO Safety Program

a. Employee rights and responsibilities _____
b. Fall Protection Policy _____
c. Hot Work Policy _____
d. Personnel Protective Equipment Use _____
e. Disciplinary Policy _____
f. Safety Director responsibilities _____
g. Site Superintendent responsibilities _____
h. Property Loss _____
i. First Aid Procedures _____
j. Early Return To Work Policy _____
k. Security Procedure _____
l. Personnel Safety Rules _____
    1. Power Tool Safety _____
    2. General Electrical Safety _____
    3. Lead and Asbestos awareness _____

Supervisor Signature _____ DATE:_____

Employee Signature _____ DATE:_____

Appendix E

IMEDCO AMERICA LTD.
DAMAGE TO EQUIPMENT/PROPERTY INVESTIGATION REPORT

Project Name:

_____

Location:

_____

TYPE OF REPORT:
+ Property Damage (Job site)
+ Property Damage (Other)
+ Equipment
+ Other

EQUIPMENT/PROPERTY

Description of Equipment/Property: (attach second sheet with additional information)

_____
_____
_____
_____
_____

Employer/Person using equipment: (attach second sheet with additional information)

Name:_____
Address:_____
Home Phone:_____
Business Phone:_____
Employer:_____
Trade:_____
Date of Incident: _____ Time: _____

Type of Loss (fire, wind, explosion, theft, accidental damage etc.):

_____
_____

Police or fire department that incident was reported: (address, telephone, & names)

_____
_____

Description of incident: (Attach second sheet with additional information)

_____
_____
_____
_____

Extent of damage:

_____
_____
_____

In your opinion did an unsafe act or condition cause the damage?:

_____

If yes what corrective steps were taken?
(Attach second sheet with additional information)

_____
_____
_____
_____

What additional measures should be taken?
(Attach second sheet with additional information)

_____
_____
_____
_____

Witnesses of incident home & business address and phone numbers:
(Attach second sheet with additional information)

_____
_____
_____
_____

Damage required off-site repair? Yes (___) No (___)

Where was equipment taken?
COMPANY:_____
ADDRESS:_____
TELEPHONE:_____
CONTACT PERSON:_____
PICK-UP DATE:_____

Appendix F

HOT WORK PERMIT
(WELDING, CUTTING AND PREHEATING)

DATE:_____ PERMIT #:_____ FOREMAN:_____
COMPANY NAME:_____
PERMIT VALID TO DATE:_____
BUILDING: _____ AREA: _____ ELEVATION:_____
WELDERS NAME & COMPANY:
_____
_____
_____
SPECIAL INSTRUCTIONS:

	Satisfactory	Unsatisfactory
Flammable materials covered or protected	(___)	(___)
Fire extinguisher provided	(___)	(___)
Container provided for stubs	(___)	(___)
Area checked for cleanliness	(___)	(___)
Fire watch provided	(___)	(___)

** Fire watch is required if work being performed is area where other than a minor fire might occur. The fire watch shall be maintained for at least one-half hour after cutting, welding, or operations are completed.

SPECIAL INSTRUCTIONS:_____
_____
_____

SURVEILLANCE
FOREMAN: _____ DATE:_____ SUPERVISION:_____
FOREMAN: _____ DATE:_____ SUPERVISION:_____
FOREMAN: _____ DATE:_____ SUPERVISION:_____
FOREMAN: _____ DATE:_____ SUPERVISION:_____
FOREMAN: _____ DATE:_____ SUPERVISION:_____

Appendix G – Accident Report

NAME:			SOCIAL SECURITY NO:
DEPARTMENT:	EMPLOYEE NO:		DATE:
JOB TITLE:	LENGTH OF SERVICE:	AGE:	SEX: MALE FEMALE
HOME ADDRESS:			PHONE:

Cause:

DATE OF ACCIDENT:	TIME OF ACCIDENT:	DATE REPORTED:	TIME REPORTED:
LOCATION OF ACCIDENT:			
CAUSE OF ACCIDENT: UNSAFE ACT UNSAFE CONDITIONS BOTH			
DESCRIBE ACCIDENT:			
EQUIPMENT INVOLVED:			
VIOLATION OF RULES: YES NO	IF YES, PLEASE EXPLAIN		
DISCIPLINARY ACTION:			

Injury:

DESCRIBE EXTENT OF INJURY:	
FIRST AID RENDERED? YES NO	EXPLAIN:

Witnesses:

NAME:		PHONE:	
ADDRESS:	CITY:	STATE:	ZIP:
NAME:		PHONE:	
ADDRESS:	CITY:	STATE:	ZIP:
NAME:		PHONE:	
ADDRESS:	CITY:	STATE:	ZIP:

Medical Attention
Any fatalities: YES NO

First Aid Given By:

NAME:		PHONE:	
ADDRESS:	CITY:	STATE:	ZIP:
DATE:	TIME:		

Examined by (Doctor):

NAME:		PHONE:	
ADDRESS:	CITY:	STATE:	ZIP:
DATE:	TIME:		

Taken to Hospital by:

NAME:		PHONE:	
ADDRESS:	CITY:	STATE:	ZIP:
DATE:	TIME:		

Family Notified by: _____Date:_____

Was work time lost by employee? YES NO

Date the employee returned to work:_____

Prevention

Future action to be taken:_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Supervisor: _____ Date: _____

Approved by: _____ Date: _____

Sheet 2 of 2

Appendix H - Site Specific Emergency Action Plan

Facility Name: Hospital

Facility Address: Address
City, ST ZIP

EMERGENCY PERSONNEL NAMES AND PHONE NUMBERS

EMERGENCY COORDINATOR:

Name: Matt Krachon Phone: (317) 529-1315

Company: IMEDCO America

EMERGENCY PHONE NUMBERS

FIRE / POLICE / AMBULANCE: DIAL 911

SECURITY (If applicable): _____

BUILDING MANAGER (If applicable): _____

MEDICAL FACILITY

If a medical emergency arises while IMEDCO employees are working at a jobsite, proceed to the following medical facility:

LOCAL EMERGENCY MEDICAL FACILITY

NAME: Hospital

ADDRESS 1: Address

ADDRESS 2: City, ST ZIP

PHONE: (XXX) XXX-XXXX

DATE PREPARED: 1 / 1 / 2016

PREPARED BY: Matt Krachon

Appendix I - Scope of Work Checklist

Project Name **HOSPITAL - CITY**

IMEDCO Project # **18---**

	YES	NO
Installation of 250 or 500 ton self-supporting C1006 Magnetic Shield	☐	☑
Installation of <250 ton self-supporting C1006 Magnetic Shield	☐	☑
Installation of M36 Magnetic Shield	☑☐	☑☐
Installation of copper RF Shield	☑☐	☑☐
Installation of aluminum RF Shield	☑☐	☑☐
Installation of the Acoustic Shield	☑☐	☑☐
Installation of Interior Finishes	☐	☑