SIMON

CORPORATE SAFETY MANUAL

Corporate Office:

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GOAL COLAS ZERO

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1.0 SCOPE

The H.A.S.P. process is a means whereby work practices are reviewed and potential safety concerns are uncovered before an operation begins. Once potential hazards are identified, preventative steps can be taken to eliminate issues.

2.0 POLICY

A written H.A.S.P. is required prior to commencement of any operation on the project. The H.A.S.P. process is a method of breaking down hazards into steps and creating an elevated level of awareness which gets workers thinking about worker-safety prior to starting their work. The H.A.S.P. process is a core belief of our safety program and the completion of the H.A.S.P form is a requirement prior to starting any job.

3.0 PROGRAM REQUIREMENTS

3.1 The H.A.S.P. process will be written by the responsible Superintendent, Field Engineer, Foremen or hourly employee with Foreman/Supervisor overview.

3.2 The Personal Hazard Recognition form will be written and utilized by all employees before they begin their specific personal scope of work, and reviewed/signed by all members performing work related to the operation.

3.3 All Visitors must sign the H.A.S.P form before they have access to any of our locations. This includes MSHA pits and quarries, Construction sites, Asphalt and Concrete plants.

4.0 PROCEDURES

4.1 Use the HAZARD ASSESSMENT CHECKLIST to identify hazards each operation will have. Refer to Appendix 1B for the Daily HASP Form.

4.2 During New Employee Orientation, all Foremen and hourly employees will receive instruction on the H.A.S.P. process and their responsibilities.

4.3 The Superintendent shall review the H.A.S.P form with the Foreman anytime they are on location. Please remember feedback is very important (positive and opportunities for improvement).

4.4 Regional Managers, Project Managers, Construction Managers, Manufacturing Managers, Engineers and other Supervisors should always review the H.A.S.P form and give feedback to the Foreman/crew.

4.5 Superintendents, Project Managers, and a representative from the regional Safety Department will sign off on the completed H.A.S.P. form.

4.6 H.A.S.P. form will remain with the crews until the end of each work day then turned in.

4.7 If a new shift or crew comes to take over, they must complete a new H.A.S.P form to start their shift.

4.8 H.A.S.P. forms shall be scanned and stored on the project's server under Safety/H.A.S.P. folder. However, each region may do this a little differently to fit their needs. Please ask your regional Safety Manager for clarification and the exact flow/process for your specific region.

1.0 SCOPE

This program sets the minimum requirements for when, where, and how Daily Hazard Assessments are to be conducted at SIMON. It encompasses all SIMON work operations.

2.0 PURPOSE

The purpose of this program is to provide clear criteria, information, and clear direction for SIMON Supervisors and employees to assess workplace Health, Safety, and Environmental (HSE) hazards on a daily basis, specifically at the workplace, where there is the highest potential for incident and injury. This program will provide required expectations for hazard assessment, hazard elimination, and clear work practices to control those hazards which must be reviewed at the crew level and signed-off on daily, prior to the start of work operations.

3.0 HAZARD ASSESSMENT GENERAL REQUIREMENTS

3.1 General. The first-line Supervisor which is typically the Job-Site Foreman, or the Job-Site Superintendent, must ensure all work sites are assessed for existing and potential workplace hazards before work begins at any site. Any designated employee can perform the Job Safety Assessment (JSA) meeting. Use the Daily HASP Form found in Appendix 1B to complete this process, or a comparable form. Appendix 1B is only one example.

At a minimum, this form must be completed daily and reviewed with the crew daily by the SIMON Supervisor-in-charge, and all employees working must sign-off on the Hazard Assessment at the start of work shift. This form must be updated if and when new work processes are introduced, when a work process or operation changes, before a significant change occurs at the work-site, or when a new hazard is introduced.

3.2 Items to be documented. All results of the hazard assessment must be documented on the Hazard Assessment Form and must show methods to be used to eliminate or control the hazards at the worksite. Documentation must also show the date and time the hazard assessment was prepared or revised, and must be available for review at any time by affected workers and personnel arriving on-site.

3.3 Employee Involvement. The SIMON Supervisor must ensure that workers are involved in the hazard assessment and control of hazards, and must inform affected workers—including subcontractors—of identified hazards and methods of control as they become involved in the work site.

3.4 Elimination or Control. Existing or potential hazards to workers identified in the Hazard Assessment must be eliminated, or if not reasonably practicable to do so, then they must be controlled. SIMON Supervisors must first consider elimination or control when completing the Hazard Assessment by the following:

3.4.1 Engineering Controls. If possible, this is preferred, as it eliminates or controls hazards at its source—for example, setting up a road closure or detour to eliminate the traffic hazard during road paving.

3.4.2 Administrative Controls. When engineering controls are not possible or practical, administrative controls are the next best option—to control a hazard to a degree as low as possible, at the level of work rather than the source. The following is an example: paving at night, weekend, or during off-peak hours to achieve work during low traffic volume times.

3.4.3 Personal Protective Equipment. If a hazard cannot be eliminated or controlled by the above controls, proper PPE must be used—for example, retro reflective vests, respirators, face shields, gloves, etc.

4.0 RESPONSIBILITIES FOR THE HAZARD ASSESSMENT PROCESS

4.1 Senior Managers and Managers. Managers are responsible for supplying the necessary resources and support required for training and hazard control, as well as reviewing, monitoring, and enforcing the expectations in this program.

4.2 Superintendents/Project Engineers. Superintendents are responsible for the implementation of the hazard assessment program. At the direction of the Manager, they outline the company's expectations and assign specific responsibilities to the Foremen/Superintendent reporting to them. They will review, monitor, and enforce program expectations, and are accountable to the Manager.

4.3 Foremen and Front-Line Supervisors. Foremen and Supervisors must ensure that written hazard assessments are performed as required by this program. The Supervisor must keep the Hazard Assessment available for review by SIMON personnel, subcontractors, and visitors to the project. They will ensure workers are trained in the Hazard Assessment Program, the Up-to-Date Hazard Assessment, all expectations of the Hazard Assessment, and monitor and enforce those expectations.

4.4 All Employees. All employees are required to actively participate in the Hazard Assessment Program and Hazard Assessment for all sites and projects as directed by the SIMON Supervisor. The employees are also required to report potential new hazards to their immediate Supervisor so it can be addressed in the Hazard Assessment.

5.0 DAILY HAZARD ASSESSMENT (HASP) ATTENDANCE AND PARTICIPATION REQUIREMENTS

POSITION	REQUIREMENTS
All Management	Review HASP anytime on-site. Discuss the importance and provide feedback.
Corporate Management	Attend a minimum of 1 HASP meeting per month. Ask these follow-up questions after your meetings: • What are the hazards most concerning to you? • How are you going to mitigate those hazards? • How can I help? • How have you positively recognized employees hazard assessment engagement? • Did you take the opportunity to recognize the Senior Staff, Middle Level Management, Frontline Leaders and Frontline Employees?
Regional Manager	Attend a minimum of 2 HASP meetings per month at alternate jobs. Ask these follow-up questions after your meetings: • What are the hazards most concerning to you? • How are you going to mitigate those hazards? • How can I help? • How have you positively recognized employees hazard assessment engagement? • Did you take the opportunity to recognize the Middle Level Management, Frontline Leaders and Frontline Employees?
Area, Construction, Plant, and Shop Manager	Attend a minimum of 2 HASP meetings per month at alternate jobs.
Project Manager and Project Engineer	Attend a minimum of 2 HASP meetings per month at alternate jobs. Attend a minimum of 2 HASP meetings per week when employee is assigned to 1 job. Ask these follow-up questions after your meetings:

	• What are the hazards most concerning to you? • How are you going to mitigate those hazards? • How can I help? • How have you positively recognized employees hazard assessment engagement? • Did you take the opportunity to recognize the Frontline Leaders and Frontline Employees? **Review the quality and quantity of the completed hazard assessment forms and submit them to regional safety department monthly.
Superintendent	Attend a minimum of 2 HASP meetings per week. Ask these follow-up questions after your meetings: • What are the hazards most concerning to you? • How are you going to mitigate those hazards? • How can I help? • How have you positively recognized employees hazard assessment engagement? • Did you take the opportunity to recognize the Frontline Leaders and Frontline Employees? **Review the quality and quantity of the completed hazard assessment forms and submit them to regional safety department monthly.
Foreman, Site Supervisor, and Designated Employee	Accountable to conduct a daily HASP meeting.
Employee	Required to actively participate in the daily HASP meeting and sign the HASP form.
Trucking and Mechanics	Required to participate in the daily HASP meeting when on-site during meeting. If arriving afterwards, employee must review and sign the HASP.
Regional HSE Staff	Attend a minimum of 2 HASP meetings per month at alternate jobs.

6.0 HAZARD ASSESSMENT AND JOB SAFETY ANALYSIS AT THE JOB-SITE

The following steps must be used by the SIMON Supervisor to perform the Hazard Assessment at the job-site.

6.1 Gather employees and subcontractors that will be involved.

6.2 Discuss possible hazards and controls with this group.

6.3 Tour the entire job-site and/or an area that will include representative hazards of the entire job.

6.4 Look for all hazards involving materials, utilities, environment, equipment, and people.

6.5 Encourage discussion on all hazards identified to flush out any not so obvious hazards.

6.6 Mark all items that need attention on the Hazard Assessment form. In writing, identify hazards and control measures where there is no place to check-off on the form.

6.7 Where necessary for specific hazards, identify responsible persons on the form and ensure they will take necessary steps.

6.8 Identify the basic emergency plan, first-aid procedures, and any special hazards that may be present on that particular site.

6.9 Ensure the Hazard Assessment is reviewed with employees daily.

6.10 Ensure that all hazards as identified are eliminated or controlled.

6.11 Ensure that all employees sign-off on the form every day prior to the start of work operations.

6.12 Monitor work site for hazards during the shift. Address any unforeseen hazards as they occur, and communicate changes to the employees affected by the hazard.

6.13 Review the Hazard Assessment with SIMON employees and visitors who come on site after completion of JSA Meeting, which includes: SIMON Truck Drivers, SIMON Mechanics, SIMON visitors to the site, and external visitors.

6.14 The Hazard Assessment forms must be retained with the project files.

7.0 ANNUAL HAZARD REVIEW FOR FIXED LOACTIONS

All SIMON Fixed Locations (such as HMA Plants, Yards, Shops, and Quarries) will have an Annual Hazard assessment conducted by the Manager in charge. The information gathered during annual assessment will be placed on the Annual Hazard Assessment Form in Appendix 1C, and given to all delivery drivers, vendors, truck drivers (SIMON and owner operator), and any other short term personnel that will be on site that will not be covered by the mornings JSA.

7.1 The SIMON Supervisor-in-charge of the location will be responsible to ensure that all visitors, vendors, and delivery drivers have reviewed and signed off on this site hazard assessment annually.

7.2 The SIMON Trucking Superintendent or designated Manager in charge will be responsible for distributing this information to their drivers and any owner-operators contracted to haul for SIMON.

7.3 The SIMON Manager in charge will be responsible for distribution to all outside sales customers that will be at SIMON sites.

7.4 Subcontractors working on site at these locations are excluded from the annual review and must comply with the SIMON' Daily Hazard Assessment Process.

8.0 SUBCONTRACTORS

All SIMON Subcontractors must adhere to the requirements of this program while working on SIMON projects. Subcontractors may conduct their own JSA meeting or join in the SIMON meeting. It is the responsibility of the SIMON Supervisor-in-charge of the Subcontractor to insure that they are participating in the Hazard Assessment Program.

9.0 OWNER-SPECIFIC REQUIREMENTS

When SIMON is performing work operations, and a specific owner/client requires the use of their Daily Hazard Assessment/Daily JSA/etc. procedures and forms, where the program may be more stringent than the SIMON Hazard Assessment Program, then the owner/client program takes precedence.

DAILY HAZARD ASSESSMENT FORM	APPENDIX 1B	
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TOP 5 CAUSES OF INJURY	1. Being in the line of Fire	2. Strains and Sprains
3. Slips/ Trips and Fall	4. Cuts and Lacerations	5. 3-Points of Contact

Hazard Assessment Form must be reviewed daily and prior to the start of the work shift with the crew by the SIMON Supervisor-in-Charge. It must be reviewed with all crew members and each employee must sign-off. By signing, the employee acknowledges that they clearly understand and will abide by all corrective measures identified on this form.

Beginning in 2023 all daily HASP forms will be completed in HCSS.

Employee Daily HASP Form

HAZARD ASSESSMENT for SAFE PRODUCTION

The HASP form must be completed and signed daily by everyone actively involved in the project

Date		**EMS Contact**	
Location		**EMS Phone #**	
Supervisor		**Safety Manager**	
Job No.(s)/Equip No.(s)		**Safety Manager Phone #**	
Managers Reviewing		**Emergency Check In Point**	

Keep Safety on TRACK

T	**THINK through the task:** What are the jobs that need to be completed. What different tasks are involved with completing the job?	
R	**RECOGNIZE the Hazards:** What hazards are related to the job? (Chemical, Biological, Physical, Ergonomic, Weather, Traffic)	
A	**ANALYZE The Hazards:** What accidents or injuries can occur from the hazards associated with all tasks involved with this job?	
C	**CONTROL the Hazards:** What steps can be taken to remove or reduce the hazards associated with the job?	
K	**KEEP Safety First! Goal Zero - A pursuit of excellence in all our safety activities.**	

Lock Down Hazards on our job EVERY DAY

Questions	YES	NO	N/A		YES	NO	N/A
Is Personal Protective Equipment (PPE) available?				Are restroom facilities and trash receptacles available in the work area?			
Any Special PPE needed to do the job safely?				Are the work areas clean, clear, and uncluttered?			
Has inspection of all of your tools been completed?				Did all employees complete Stretch and Flex?			
Are all required permits in place to complete job? (Confined Space, Locates, Rigging, Hot work, Excavation)				Are all employees trained on the tasks that they will be doing?			
Are there any employees that need to be recognized for safety?				Are there any issues that need to be addressed by Management and/or by Safety?			

MANAGEMENT PARTICIPATION:

Weather: SNOW | SUNNY | ICE | RAIN | FOG | LIGHTNING | WIND

Safety Opportunities:

Participants/ Visitors

Reviewed by	Print Name:	Sign Name:	Comments, Questions or Safety Concerns:

HASP Completed By:

Stretch and Flex Leader:

SAFETY STEERING TEAM (SST) CONTINUOUS IMPROVEMENT TEAM (CIT) SAFETY CULTURE EXCELLENCE WORKSHOP (S.C.E.W.)	SECTION 2	
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1.0 SAFETY STEERING TEAM

Purpose of Steering Team:

To develop and implement strategies that will achieve zero incidents through visible leadership and engaging the hearts and minds of all employees to make decisions that lead to a positive culture of sustainable safety excellence.

Safety Steering Team is composed of many different types of employees across our organization. From front-line employees, Foreman, and managers to senior leaders. All members of the Safety Steering Team must follow the Safety Steering Team Charter.

2.0 CONTINUOUS IMPROVEMENT TEAMS (CIT)

As part of our journey to safety excellence, continuous improvement teams and Rapid Improvement Workshops will be used as outlined in the Safety Steering Team Charter. It is our goal to have various employees serve on a Continuous Improvement Team to improve safety processes within our organization. If you are asked to take part in a Continuous Improvement Team, actively participate, and bring your ideas to the table. It is with your help that SIMON will continue to improve.

3.0 SAFETY CULTURE EXCELLENCE WORKSHOP (S.C.E.W)

The Safety Culture Excellence Workshop is a 4 – 6 hour session that is intended to help participants:

3.1 Understand proven safety management principles.

3.2 Learn how those principles apply to our Goal Zero continuous improvement process.

3.3 Identify steps to help change safety culture.

All employees—including Front-Line Employees, Supervisors, Managers and Senior Leaders—are expected to participate in the Safety Culture Excellence Workshop.

SAFETY AND HEALTH POLICY	SECTION 3	
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The personal safety and health of each SIMON, Inc. employee is of primary importance. The prevention of occupationally-induced injuries and illnesses is of such consequence that it is given precedence over operating productivity. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health, in keeping with the highest standards.

SIMON, Inc. will maintain a safety and health program conforming to the best practices of the industry. To be successful, such a program must embody the proper attitudes toward the prevention of injury and illness on the part of both Supervisors and employees. It also requires cooperation regarding all safety and health matters, not only between Supervisor and employee, but also between each employee, his fellow workers, and subcontractors. It is only through cooperative efforts that a safety program can be established and maintained in the best interest of all stakeholders.

SIMON' objective is a safety and health program that will minimize the number of disabling injuries, not merely in keeping with, but surpassing, the best safety practices within our industry. Our goal is zero **("GOAL ZERO")** accidents and injuries. Our safety and health program will include:

1. Providing mechanical and physical safeguards to the maximum extent that is possible.
2. Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to comply fully with the safety and health standards for every job.
3. Training all employees in good safety and health practices.
4. Providing necessary personal protective equipment and instructions for its use and care.
5. Developing and enforcing safety and health rules and requiring that employees comply with these rules as a condition of employment.
6. Prompt and thorough investigation of every accident and incident to find root causes and modify the program to prevent reoccurrence.

We recognize that the responsibilities for safety and health are shared between the following stakeholders:

1. As your employer, we accept the responsibility for leadership of the safety and health program, for its effectiveness and continuous improvement, and for providing the safeguards required to ensure risk- free conditions.
2. Our Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise; and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved.
3. As employees, you are responsible for whole-hearted, genuine cooperation with all aspects of the safety and health program - including compliance with all rules and regulations, and for continuously practicing safety while performing your duties.

Trevor Tipotch, President

_____

Date: _____

Darin Ferguson, Safety Director

_____

Date: _____

GENERAL SUPERVISOR AND EMPLOYEE SAFETY RESPONSIBILITIES	SECTION 4	
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1.0 SCOPE

This program sets the minimum general safety responsibilities for Supervisors and employees to follow on any SIMON job-site, plant, and/or company owned property.

2.0 PURPOSE

The purpose of this program is to provide clear "general" safety responsibility criteria for SIMON Supervisory personnel and employees which they are required to follow at all times.

3.0 GENERAL SAFETY RESPONSIBILITIES FOR EACH POSITION

3.1 Senior Management. Senior management must take ownership of and promulgate the Corporate Safety Program as effectively and efficiently as possible to reduce and/or eliminate employee injuries, general liability claims, and auto losses. This is to be done through systematic endorsement, assignment of responsibilities, and enforcement of the Corporate Safety Program within their respective region and throughout SIMON.

3.2 Area Manager. The Area Manager is emphasized in this program because of the key role exercised by this individual. The success of our Corporate Safety Program depends in large measure on the Area Manager's ownership and dissemination of the Corporate Safety Program. To that end, the Area Manager is required to:

3.2.1 Require his/her subordinates to comply with all aspects of the Corporate Safety Program.

3.2.2 Require frequent safety status reports from each project on safety performance of their projects (e.g. number of accidents/incidents, near misses, job-site conditions, the planning of safety into production, safety audits, safety observations, and etc.).

3.2.3 Discuss safety where applicable in the weekly scheduled meetings.

3.2.4 Pro-actively interact with the SIMON Safety Department for pre-planning and technical safety support.

3.2.5 Require submission of a detailed accident-incident investigation report in a timely manner with emphasis on corrective action taken for each occurrence of injury, significant near miss, equipment damage, property damage, or auto accident involving a company vehicle.

3.2.6 Require submission of a detailed OSHA/MSHA inspection checklist in a timely manner for every OSHA/MSHA inspection held on a job under his/her supervision.

3.2.7 Ensure that field supervision under him/her place job safety and job production on an equal basis.

3.2.8 Ensure that required safety meetings and safety inspections by Supervisors are regularly held and conducted.

3.2.9 Ensure completion of and participate in the Annual Supervisory Safety Review process. Make sure that the Supervisory Safety Review is completed in an objective manner and that Supervisors are scored accordingly. Also ensure that the Safety Performance Review was reviewed with the evaluated employee.

3.2.10 Ensure that all subcontractors, vendors, suppliers, etc., have been put on notice as to the requirements of the Simon Corporate Safety Program. In addition, require all direct-report Supervisors to enforce the Corporate Safety Program requirements with subcontractors, vendors, suppliers, etc.

3.2.11 Support and assist where necessary with safety training initiatives, the winter safety training process, Safety Kick-Off meetings, and all other related safety training items.

3.2.12 Support the disciplinary action policy and conduct disciplinary action for his/her employees, subcontractors, and others when deemed necessary.

3.2.13 Budget the appropriate amount of money into a job to ensure adequate safety controls can be put into place.

3.3 Construction Manager/Project Manager. The general safety responsibilities of the Construction Manager and/or Project Manager are as follows:

3.3.1 Hold a pre-construction planning meeting which includes safety as a key item.

3.3.2 Work with estimating to budget money for safety (e.g. fall protection systems).

3.3.3 Discuss safety where applicable in the weekly scheduling meetings.

3.3.4 Identify project safety concerns, contract safety requirements, and pro-actively solicit technical assistance from the SIMON Safety Department where necessary.

3.3.5 Pro-actively interact with the SIMON Safety Department for pre-planning and technical safety support.

3.3.6 Administer the Corporate Safety Program for his/her jobs, projects, or facility.

3.3.7 Support the disciplinary action policy and conducts disciplinary action for his/her employees, subcontractors, and others when deemed necessary.

3.3.8 Require his/her subordinates to comply with all aspects of the Corporate Safety Program and monitor safety responsibilities as assigned to project supervision.

3.3.9 Require submission of a detailed accident-incident investigation report from Foreman and Superintendents in a timely manner with emphasis on corrective action taken for each occurrence of injury, equipment damage, property damage, general liability type claims, or auto accident involving a company vehicle.

3.3.10 Require submission of a detailed OSHA/MSHA inspection checklist by the Foreman and/or Superintendent in a timely manner for every OSHA/MSHA inspection held on a job under his/her supervision.

3.3.11 Ensure that field supervision under him/her places job safety and job production on an equal basis.

3.3.12 Ensure that required safety meetings and safety inspections by Supervisors are regularly held and conducted.

3.3.13 Participate objectively when requested by the Area Manager and/or Regional Manager in the annual Supervisory safety review process.

3.3.14 Ensure that all subcontractors, vendors, suppliers, etc., have been put on notice as to the requirements of the SIMON Corporate Safety Program. In addition to themselves, require all direct reporting Supervisors to enforce the Corporate Safety Program requirements onto subcontractors, vendors, suppliers, etc.

3.3.15 Support and attend safety training courses, support the winter safety training process, and attend the safety kick-off meetings, and all other related safety training courses and classes as required.

3.3.16 Notify area-specific One-Call or appoint a designee.

3.3.17 Discuss safety expectations with direct reports and newly-hired direct reports as required in the Corporate Safety Program.

3.4 Project Engineer. The general safety responsibilities of the project engineer are as follows:

3.4.1 Assist estimating in the bidding process with all safety related issues as required.

3.4.2 Assist project management in the pre-construction planning process.

3.4.3 Identify project safety concerns, contract safety requirements, and pro-actively solicit technical assistance from the SIMON Safety Department where necessary.

3.4.4 Discuss safety where applicable in the weekly scheduling meetings.

3.4.5 Review the project specifications for contract safety requirements and for potential hazards.

3.4.6 Assist supervision with the administration of the Corporate Safety Program.

3.4.7 Monitor all work, including subcontractors, vendors, suppliers, etc., for safety compliance.

3.4.8 Enforce the Corporate Safety Program on subcontractors, vendors, suppliers, etc.

3.4.9 Maintain project safety files as required by his/her Supervisor.

3.4.10 Review the project schedule for activities requiring special safety measures.

3.4.11 Function as a HazCom Coordinator, meaning that this individual maintains specialized SDS's for the projects.

3.4.12 Order PPE when required to do so.

3.4.13 Post bulletin board information (e.g. - OSHA Poster, EEO, etc.) as required to do so.

3.4.14 Perform any other safety task as assigned by his/her Supervisor in regards to the Corporate Safety Program.

3.4.15 Comply with all aspects of the Corporate Safety Program.

3.4.16 Notify area-specific One-Call as required.

3.5 Superintendent. Superintendent's general safety responsibilities are as follows:

3.5.1 Assist estimating with safety items in the bidding process.

3.5.2 Discuss safety where applicable at the weekly scheduling meetings.

3.5.3 Assist the Area Manager, Construction Manager, or Project Manager in the pre-construction planning process.

3.5.4 Monitor and enforce site-specific compliance with the Corporate Safety Program and applicable OSHA/MSHA standards on SIMON Supervisors and employees, subcontractors, vendors, suppliers, etc. Require direct reports to do the same.

3.5.5 Generate and maintain project safety documentation and files as required by the Corporate Safety Program.

3.5.6 Maintain an up-to-date copy of the SIMON medical panel of physicians. When starting a job, locate the medical clinics to ensure efficient transport to them, in the event of an injury. Also transport or designate an employee to transport an injured employee to a medical center. Ensure that Foremen have the up-to-date SIMON medical panel of physicians and know where the closest medical centers are.

3.5.7 Review the contract safety requirements for special safety criteria and ensure they are met. Ensure that Foremen and project engineers complete and submit documentation as required by the Corporate Safety Program in a timely manner.

3.5.8 Review the project specifications for potential hazards and ensures appropriate safety actions are taken to protect employees.

3.5.9 Notify area-specific One-Call as directed by his/her supervision.

3.5.10 Review safety issues with the Foreman and project engineers that are pertinent to the job site, plant, or facility.

3.5.11 Discuss safety expectations and requirements of the Corporate Safety Program with newly-hired Foremen.

3.5.12 Identify project safety concerns, contract safety requirements, and pro-actively solicit technical assistance from the SIMON Safety Department when necessary.

3.5.13 Ensure that field supervision under him/her places job safety and job production on an equal basis.

3.5.14 Support the disciplinary action policy and conduct disciplinary action for his/her employees, subcontractors, and others when deemed necessary.

3.5.15 Complete a detailed accident-incident investigation report with Foreman in a timely manner, with emphasis on corrective action taken for each occurrence of injury, equipment damage, property damage, general liability type claims, or auto accident involving a company vehicle.

3.5.16 Participate in the annual Supervisory safety review process as requested.

3.5.17 Support and attend safety training courses, support the winter safety training process, and attend the safety kick-off meetings, and all other related safety training courses and classes as required.

3.5.18 Ensure security of the job-site/equipment/trailers/facility/etc.

3.6 Foreman. Foremen's general safety responsibilities are as follows:

3.6.1 Assist estimating as required in the bidding process.

3.6.2 Participate in the pre-construction meeting/planning meeting as required.

3.6.3 Ensure area specific One-Calls have been made and a valid ticket is in place.

3.6.4 Administer the Corporate Safety Program and enforce all aspects of the program on SIMON employees, subcontractors, vendors, suppliers, etc.

3.6.5 Complete all safety documentation and paperwork as required by the Corporate Safety Program.

3.6.6 Provide daily safety instruction to employees on the Corporate Safety Program and job specific safe work practices.

3.6.7 Conduct weekly tool-box talks and submit documentation to the SIMON Safety Department.

3.6.8 Conduct a weekly or monthly safety inspection as required, and submit the documentation to the SIMON Safety Department.

3.6.9 Schedule a safety orientation and provide site specific training for newly-hired crew members.

3.6.10 Ensure security of the job-site/equipment/trailers/facility/etc.

3.6.11 Complete a detailed accident-incident investigation report with the Superintendent in a timely manner with emphasis on corrective action taken for each occurrence of injury, equipment damage, property damage, general liability type claims, or auto accident involving a company vehicle.

3.6.12 Place job safety and job production on an equal basis.

3.6.13 Support and attend safety training courses, support the winter safety training process, and attend the safety kick-off meetings, and all other related safety training courses and classes as required.

3.6.14 Support the disciplinary action policy and conduct disciplinary action for his/her employees, subcontractors, and others when deemed necessary.

3.7 All Employees. Specific general criteria are as follows:

3.7.1 All SIMON employees have the right, responsibility, and duty to intervene in unsafe acts and conditions or when work activities are not in compliance with the Corporate Safety Program. **(**Section 51 - **STOP WORK AUTHORITY).**

3.7.2 Employees are required to be actively involved in the safety hazard identification process which is required of all employees at all times during work operations. This means that when an employee is aware of a safety hazard or potential safety hazard, it must be immediately brought to the attention of the SIMON Supervisor and where applicable, reviewed with all employees concerned about the hazard or potential hazard. The SIMON Supervisor must ensure that all identified safety hazards are corrected immediately.

3.7.3 Employees must comply with all aspects of the Corporate Safety Program.

3.7.4 Employees must attend a weekly tool-box talk meeting and sign the attendance sign-in sheet.

3.7.5 Employees must wear personal protective equipment.

3.7.6 Employees must support and attend safety training courses, support the winter safety training process, and attend all other related safety training courses and classes as required. Employees will be trained in the hazard identification process during all mandatory safety training courses, and employees will be expected to identify hazards and potential hazards, correct deficiencies when applicable, and when unable to correct deficiencies, notify their immediate Supervisor to immediately resolve the matter.

3.7.7 Employees must participate in the accident-incident investigation process and complete an accident-incident report as required by his/her Supervisor.

3.8 Subcontractors. Specific general criteria are as follows.

3.8.1 Subcontractors are expected and required to comply with all aspects, programs, and policies within this SIMON Safety Manual.

3.8.2 Subcontractors and subcontractor employees are required to be actively involved in the safety hazard identification process, which is required of all employees for SIMON projects at all times during work operations. This means that when a subcontractor employee is aware of a safety hazard or potential safety hazard it must be immediately corrected, and if unable to be corrected, brought to the attention of the subcontractor Supervisor and where applicable, reviewed with all subcontractor employees by the subcontractor Supervisor. The subcontractor Supervisor is required to correct all safety hazards immediately.

1.0 SCOPE

This program sets the minimum requirements to be followed by SIMON Supervisory personnel for accident and incident notification, accident and incident reporting, accident and incident investigation, and basic crisis management procedures.

2.0 PURPOSE

The purpose of this program is to provide clear requirements and procedures to be followed by SIMON Supervisory personnel when an accident, incident, and/or crisis occurs on his/her job. These requirements are a minimum and must be followed.

3.0 DEFINITIONS

Accident: An undesired event that results in a physical injury to a SIMON employee requiring medical treatment.

Incident: An event that includes all general liability claims, auto claims, property damage, utility strikes, work zone crashes, theft, and related occurrences. This also includes any event where the media becomes involved.

Crisis: A significant event where a life threatening injury occurs to any employee, subcontractor, supplier, vendor, inspector, motorist, or citizen on a SIMON job-site or company owned property; a fatality on any SIMON job-site or company owned property; any potentially newsworthy general liability or auto accident incident; or any accident or incident where the news media becomes involved that has the potential to reflect poorly on SIMON.

Lost-Time Accident: Any employee injury where an occupational health panel physician removes an employee from work for one day or more due to the severity of the injury.

Non-Work Related Injury: For the purposes of this program, a non-work related injury means a physical injury to an SIMON employee that may be detrimental to the employee's overall work performance, which could cause further injury or prove to decrease the level of the employee's safety performance. Examples of this are, but not limited to: knee injury that occurred at home, back injury that occurred at home, a prescription medication as a result of an injury that impacts the employee's performance, broken foot, etc.

Occupational Health Panel Clinic: A medical clinic where injured SIMON employees are required to treat for the first 90 days following an injury to themselves. All SIMON field supervision is required to have an updated medical panel of physicians for the geographical area he/she is working in.

4.0 EMPLOYEE INJURIES- ACCIDENTS

All SIMON personnel have a required role in the accident reporting process. This program outlines specific reporting procedures for employees and specific management positions within the company.

4.1 Notification Requirements.

4.1.1 Employees.

4.1.1.1 Work Related - Employees are responsible to immediately report all work-related injuries to their Foreman, Superintendent, and/or immediate Supervisor. This means at the time of occurrence and within the shift when the injury occurred.

4.1.1.2 Non-Work Related - Employees are responsible to immediately report non-work related injuries to their immediate Supervisor where the injury could potentially impact the employee's physical work performance. An example of this could be a strained back, knee injury that occurred at home, hernia that occurred at home, prescription medication for a non-work issue that could impact the employee's performance, etc.

4.1.2 Foremen.

4.1.2.3 Work Related - Foremen are responsible to immediately report all work-related injuries (injury requiring treatment at an occupational health clinic, which requires a Supervisory personnel to accompany employee to medical facility) to their Superintendent and the SIMON Safety Department immediately.

4.1.2.4 Non-Work Related - Foremen are responsible for immediately reporting non-work related injuries to their Superintendent and the Safety Department where the injury could potentially impact the employee's physical work performance. An example of this could be a strained back, knee injury that occurred at home, hernia that occurred at home, prescription medication for a non-work issue that could impact the employee's performance, etc.

4.1.3 Superintendent.

4.1.3.5 Work Related - Superintendents are responsible to immediately report all work-related injuries (injury requiring treatment at an occupational health clinic, which requires Supervisory personnel to accompany the employee to medical facility) to the Project Manager/Construction Manager or direct Supervisor and to the SIMON Safety Department if the Foreman has not already done so.

4.1.3.6 Non-Work Related - Superintendents are responsible for immediately reporting non-work related injuries to their Project Manager/Construction Manager or direct Supervisor and to the SIMON Safety Department if the Foreman has not already done so.

4.1.4 Project Manager/Construction Manager. The Project Manager/Construction Manager is required to report all work related injuries that require off-site medical attention by the occupational health clinic to the Area Manager by the end of the work shift. If the injury has the potential to become lost-time, is life-threatening, or is fatal, then immediate notification to the Area Manager is required.

4.1.5 Area Manager. The Area Manager is responsible for reporting work related injuries to the Regional Manager in the following time frames.

4.1.5.7 Injuries that require off-site medical attention by the occupational health clinic - 24 Hour Notice.

4.1.5.8 Lost-time injuries- End of Shift Notice.

4.1.5.9 Any injury that is or has the potential to be life threatening- Immediate.

4.1.5.10 Fatal Accident- Immediate.

4.1.5.11 Others to be determined on a case-by-case basis.

4.1.6 Regional Manager. The Regional Manager is responsible to report lost-time injuries to the President within 24 hours if the SIMON Safety Department has not already done so. In addition, the Regional Manager is required to immediately report any fatality and/or injury that has the potential to be life threatening, to the President, if the SIMON Safety Department has not already done so.

4.1.7 Safety Department. The SIMON Corporate Safety Director is required to update the SIMON President on all non-lost time injuries on a weekly basis and notify the President of lost-time injuries/recordable within 24 hours. The SIMON Corporate Safety Director is also required to immediately report to the SIMON President any fatality, serious injury, or injury that has the potential to be life threatening. The Corporate Safety Director will also be responsible to provide Colas, Inc. with immediate notification on any fatal employee accident. In addition, the SIMON Safety Department staff has the responsibility for reporting and providing updates on injuries to all levels of management depending on the circumstances of the accident and nature of the injury, and this will be based on who is able or unable (e.g. - vacation schedules) to report up the chain of command.

4.2 Transporting Injured Employee to Occupational Health Panel Clinic, Emergency Room, or other Physician. Prior to transport for a non-emergency situation, the Foreman and/or Superintendent are required to contact the SIMON Safety Department so that an appointment can be set-up for the injured employee. The Foreman or Superintendent is responsible to arrange for transport of an injured employee to the occupational health panel clinic, or if it is a serious injury, then 911 and an ambulance will be utilized. Follow-up doctor's appointments for minor-type injuries where employees can transport themselves (e.g. - strained back, stitches, sprained ankle, broken finger, etc.) will be the responsibility of the injured SIMON employee.

4.3 Accident Investigation and Report. The Foreman and Superintendent are both required to investigate the accident and complete the SIMON Accident/Incident Report Form completely and in its entirety. If a Foreman, Superintendent, or higher level manager is injured, the immediate Supervisor is required to investigate the accident and complete the accident-incident report.

In general the Project Manager/Construction Manager is required to sign-off on the report after reviewing it, and then it must be submitted to the SIMON Safety Department within 24 hours of the accident.

Other managers within SIMON may investigate, review, provide input for corrective action, and sign-off on the report depending on the severity of the accident (e.g.- Regional Safety Manager, Corporate Safety Director, Area Manager, Regional Manager, etc.), and this will be determined on a case-by-case basis.

4.3.1 Photographs and Sketches. Pictures, sketches, and diagrams are an integral part of the accident investigation process so it is imperative and required for the Supervisor completing the accident investigation to take pictures and draw accurate not-to-scale sketches/diagrams. When taking the pictures, take them as if you had to use the pictures to tell a story. In addition, all SIMON Supervisors are required at a minimum to carry a disposable 35mm box camera in their vehicle for the purposes of taking pictures at an accident scene.

4.3.2 Collection, Preservation, and Securing Evidence. Evidence such as people, positions, parts, paper, equipment, photographs, witness statements, the scene of accident, etc., are all critical components to an accident investigation and must be preserved by the SIMON Supervisor as part of the investigation process. This information is critical to aid in determining the root cause of the accident as well as if it is needed for future liability litigation.

4.4 Medical Panel of Physicians. SIMON field supervisory personnel must ensure that they have a copy of the annually updated medical panel provider booklet. This booklet has all SIMON Medical Panel Providers identified by county/area along with road maps. This booklet can be obtained via the SIMON Safety Department and/or pulled from the SIMON Simon Safe Web site (www.simonsafe.com) under the injury reporting tab.

4.5 Emergency Room Treatment. Foremen and Superintendents should only transport an injured employee to the emergency room if the injury is thought to be serious, life threatening, or when an injury occurs during off-business hours (e.g. - 5 p.m. to 7 a.m.). If at all possible, an injured employee should be taken to an occupational health panel clinic.

4.6 Drug/Alcohol Test. Any injured employee requiring off-site medical attention by an occupational health panel clinic must submit to a post-accident drug/alcohol test while at the clinic and/or emergency room. If there is a conflict in an emergency room situation, then the post-accident drug/alcohol test must be taken within 24 hours of the accident. A refusal to submit to a post-accident drug/alcohol test will be considered a positive result.

4.7 Crisis Response. Refer to heading 6.0 of this program for all requirements. Additionally, the general Crisis Response Procedure is in Appendix 5A of this program.

5.0 INCIDENTS

As defined in heading 3.0, incidents are any event that includes all general liability claims, auto claims, property damage, work zone crashes, utility strikes, theft, and related occurrences. This also includes any event where the media becomes involved. All SIMON personnel have a required role in the incident reporting process. This program outlines specific reporting procedures for employees and specific management positions within the company.

5.1 Notification Requirements.

5.1.1 Employees. All employees are responsible to immediately report all incidents to their immediate Supervisor and within the same work shift.

5.1.2 Foreman. Foremen are responsible to immediately report all incidents to their Superintendent and to the SIMON Safety Department immediately or when they become aware of an incident (e.g. work zone crash that occurred during off-hours).

5.1.3 Superintendent. Superintendents are responsible to immediately report all incidents or when they become aware of an incident, to the Project Manager/Construction Manager or direct Supervisor, and to the SIMON Safety Department if the Foreman has not already done so.

5.1.4 Project Manager/Construction Manager. The Project Manager/Construction Manager is required to report all incidents to the Area Manager by the end of the work shift. If the incident has the potential to become a life-threatening situation, involves a fatality(s), involves potentially significant property damage or loss, is or has the potential to become a media event, etc., then immediate notification to the Area Manager is required.

5.1.5 Area Manager. The Area Manager is responsible for reporting incidents to the Regional Manager within 48 hours. If the incident has the potential to become a life-threatening situation, involves a fatality(s), involves potentially significant property damage or general liability loss, is or has the potential to become a media event, etc., then immediate notification to the Regional Manager is required.

5.1.6 Regional Manager. The Regional Manager is responsible for making immediate notification of incidents to the President which have the potential to become a life-threatening situation, involves a fatality(s), involves potentially significant property damage or general liability loss, is or has the potential to become a media event, etc., if the SIMON Safety Department has not already done so.

5.1.7 Safety Department. The SIMON Corporate Safety Director is required to update the President on all incidents on a weekly basis. The SIMON Corporate Safety Director is also required to immediately report to the President any incidents which have the potential to become a life-threatening situation, involves a fatality(s), involves potentially significant property damage or loss, and is or has the potential to become a media event, etc. The Corporate Safety Director will also be responsible to provide Colas, Inc. with immediate notification on any significant incident, and this will be determined on a case-by-case basis.

In addition, the SIMON Safety Department has the responsibility to report and provide updates on incidents to all levels of management, depending on the circumstances and nature of the incident, and this will be based on who is able or unable (e.g. vacation schedules) to report up the chain of command.

5.2 Incident Investigation and Report. The Foreman and Superintendent are both required to investigate the incident and complete the SIMON Accident/Incident Report form completely and in its entirety, found in Appendix 5A. In general, the Project Manager/Construction Manager is required to sign-off on the report after reviewing it, and then it must be submitted to the SIMON Safety Department within 24 hours of the accident.

5.3 Other managers within SIMON may investigate, review, provide input for corrective action, and sign-off on the report depending on the severity of the accident (e.g.- region Safety Manager, Corporate Safety Director, Area Manager, Regional Manager, etc.), and this will be determined on a case-by-case basis.

5.3.1 Photographs and Sketches. Pictures, sketches, and diagrams are an integral part of the incident investigation process so it is imperative and required for the Supervisor completing the incident investigation to take pictures and draw accurate not-to-scale sketches/diagrams. When taking the pictures, take them as if you had to use the pictures to tell a story. In addition, all SIMON Supervisors are required at a minimum to carry a working camera in their vehicle for the purposes of taking pictures at an incident scene; a cell phone with a camera is also acceptable.

5.3.2 Collection, Preservation, and Securing Evidence. Evidence such as people, positions, parts, paper, equipment, photographs, witness statements, the scene of accident, etc., are all critical components to an

incident investigation and must be preserved by the SIMON Supervisor as part of the investigation process. This information is critical in determining the root cause of the accident as well as for future reference in liability litigation.

5.4 Drug/Alcohol Test. Any SIMON employee physically involved (e.g.- struck a gas line while operating an excavator) in an incident must submit to a post-accident drug/alcohol test during that shift, unless a scheduling conflict occurs with the testing facility, then the test must be taken within 24 hours of the incident. A refusal to submit to a post-accident drug/alcohol test will be considered a positive result.

5.5 Crisis Response. Refer to heading 6.0 of this program for all requirements. Additionally, the general Crisis Response Procedure is in Appendix 5A of this program.

6.0 CRISIS

If a crisis situation arises or has the potential to arise as defined in heading 3.0, then immediate notification needs to be made to the SIMON Corporate Safety Director. The Corporate Safety Director will then initiate the general Crisis Response Procedure (Appendix 5A) by notifying the Crisis Team Leader. The Crisis Team Leader will then provide direction to all crisis team members as identified on the procedure. In addition, the Crisis Team Leader will provide direction for all project Supervisory personnel on how to handle and respond to the situation. The SIMON Safety Director and/or Crisis Team Leader will notify the President.

7.0 GENERAL REQUIREMENTS

7.1 Training. SIMON Supervisory Personnel will be periodically trained in their roles and responsibilities for accident, incident, and crisis response and incident investigation techniques. This will be completed at the spring HSE kick-off meetings and will be completed by the HSE department.

7.2 Witness Interviews and Statements. For Accidents, Incidents, and Crisis situations, witness interviews and statements must be collected. Record witness statements on the witness statement page of the Accident/Incident report (page 5A-4). Utilize additional paper if necessary when obtaining all witness statements.

7.3 Lessons Learned. Lessons learned will be communicated to all employees by way of training classes, tool-box talks, safety committees, safety flashes, etc., in an effort to prevent a reoccurrence.

ACCIDENT/INCIDENT AND CRISIS RESPONSE REPORTS	APPENDIX 5A	
	EFFECTIVE DATE **January 3, 2022** (Revision No. 2- April 1st, 2016)	**PAGE** **1 of 15**

SUMMARY OF DOCUMENTS

- **Employee Injury Report**
- **Witness Statement**
- **Accident Alert**
- **Equipment Damage/Loss/Theft Report Form**
- **Post-Accident Follow-up Response and Recordkeeping**
- **Emergency Contacts**

SIMON

CALL Regional - Safety Manager

SIMON

Employee INJURY Investigation Report

(Complete a form for each injured employee)

Job / Region # _____

Injured Employee Name: _____

Foreman Name: _____

Superintendent Name: _____

Date of Incident: _____ **Time Work Day Began:** _____

Time of the Incident: _____ **Day of the Week:** (circle) **S M T W Th F S**

Location where injury occurred: [Be specific – Jobsite cross streets – Auto related to work – Shop, Plant or Pit (exactly where)]

Diagram Incident:

Questions directly from the OHSA Form 301

What was the employee doing just before the injury occurred?:

What happened?: How the injury occurred. Examples: Ladder slipped on wet surface and worker fell 20 feet; Worker fell getting off a piece of equipment

What was the injury or Illness?: Body part involved and how involved. More specific than "hurt" or "pain". / Strain – Break – Burn - Contusion

SIMON

TREATMENT

Employee Treated by Safety Manager □ **Yes** □ **No**

Employee Treated On Site by Simon Personnel □ **Yes** □ **No**

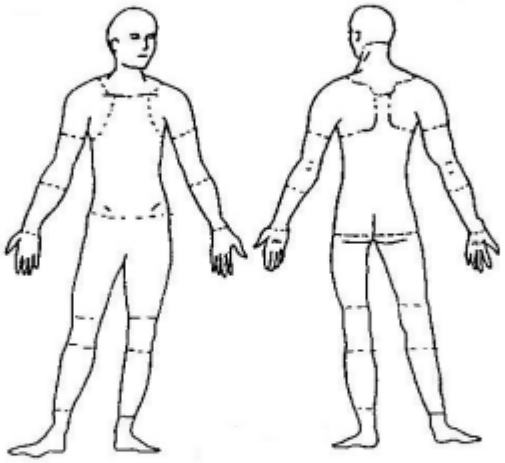
Employee transported to Occupational Clinic □ **Yes** □ **No**

Employee transported to Hospital □ **Yes** □ **No**

Transported to what Hospital (If transported to Hospital) _____

Transported by Ambulance – What Company _____

Body Part affected (Shade all that apply on diagram below)



Safety/Risk Manager Contacted □ **Yes** □ **No**

Incident Pictures taken (Employee, method of injury and surrounding area) □ **Yes** □ **No**

Pictures sent to Safety Manager (Send one of two photos immediately) □ **Yes** □ **No**

LIST ANY OTHER RELEVANT INFORMATION: INCIDENT WITNESSES–Conditions (i.e. Heavy rain, soil erosion) No PPE used, etc…

Report Completed By: _____ Report reviewed by Supervisor?: □ Yes □ No

Supervisor's Signature _____ Date Investigation ended: _____

WITNESS STATEMENT

PAGE _____ OF _____

DATE OF INCIDENT _____ JOB NO. _____

EMPLOYEE'S NAME _____

ADDRESS _____ CRAFT _____

_____ TELEPHONE # _____

STATEMENT OF WITNESS _____

STATEMENT OF INJURED _____

PLEASE ANSWER ALL BASIC QUESTIONS WITH AS MUCH DETAIL AS YOU RECALL:

Who was involved? Where did the incident take place? When did the incident occur? What work was being done? What caused the incident to occur? Any other relevant information?

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____(continue on back if needed…)

SIGNED _____DATE_____

Post-Accident
Follow-Up
Response & Recordkeeping

POST-ACCIDENT CHECKLIST

Immediately after an accident, have you:	**YES**	**NO**
○ Taken the employee for medical assistance?	☐	☐
○ Provided any necessary emergency action to prevent further injury or property damage?	☐	☐
○ Secured the scene to preserve the evidence for study?	☐	☐
○ Take photos or measurements if needed (camera – black box)?	☐	☐
○ Obtained a written statement from the injured employee?	☐	☐
○ Interviewed witnesses to determine what happened?	☐	☐
○ Developed an action plan?	☐	☐
○ Reported the incident to the Safety Department/Supervisor?	☐	☐

Does your record include the following information:	**YES**	**NO**
○ Name of injured employee(s)?	☐	☐
○ Accident date and time?	☐	☐
○ Date and time reported?	☐	☐
○ Nature and extent of injury/illness?	☐	☐
○ Name and address of doctor and hospital?	☐	☐
○ Location of accident?	☐	☐
○ Witnesses and their activities at the time of the accident?	☐	☐
○ Description of the accident?	☐	☐
○ Task/activity engaged in at the time of the accident?	☐	☐
○ Relevant training of employee?	☐	☐
○ Physical surroundings of the accident?	☐	☐
○ Unsafe acts that could have led to the accident?	☐	☐
○ Unsafe conditions that could have led to the accident?	☐	☐
○ Cause(s) of the accident?	☐	☐
○ Action taken to prevent similar accidents?	☐	☐
○ Additional recommendations?	☐	☐

Post-Accident Follow-up Response and Recordkeeping (continued)

Describing the accident:

Who was involved in the accident?

What injuries or equipment damage occurred as a result of the accident?

When did the accident happen?

Where did the accident happen?

How did the accident happen?

How was employee injured?

Why did the accident happen?

CONTACTS IN THE EVENT OF AN EMERGENCY

SIMON Corporate Crisis Management Team

POSITION	EMPLOYEE NAME	CONTACT INFORMATION
Team Leader #1	**Darin Ferguson**	**Day: 307-635-9005** **Email: dferguson@simonteam.com** **Cell: 307-275-1233**
Team Leader #2	**Brett Baker**	**Day: 307-635-9005** **Email: BBaker@simonteam.com** **Cell: 307-287-7879**
Spokespersons (PRIMARY) ***back-ups are at bottom of page	**Darin Ferguson**	**Day: 307-635-9005** **Email: Dferguson@simonteam.com** **Cell: 307-275-1233**
President	**Trevor Tipotch**	**Day: 307-635-9005** **Email: ttipotch@simonteam.com** **Cell: 307-757-7522**
Safety Director	**Darin Ferguson**	**Day: 307-635-9005** **Email: Dferguson@simonteam.com**
Environmental Coordinator	**Rod Havens**	**Day: 307-635-9005** **Email: Rhavens@simonteam.com**
Safety Administrative Asst.	**Midge Lynes**	**Day: 307-635-9005** **Email: mlynes@simonteam.com** **Cell: 307-689-7755**
HR Administrator	**Larry Wilson**	**Day: 307-635-9005** **Email: lwilson@simonteam.com** **Cell: 307-630-6568**
Colas Representative	**Vicky Hoyt**	**Day: 973-656-4830** **Email: vhoyt@colasinc.com** **Cell: 909-800-3366**
Colas Legal Representative	**Anthony Martino**	**Day: 973-290-9082** **Email: amartino@colasinc.com**

		Night: 973-696-0643 **Cell: 973-476-1063**
Colas Legal Representative	**Dan LaFrance**	**Day: 973-656-4820** **Email: dlafrance@colasinc.com**
Central Region Manager	**Eric St Pierre**	**Day:** **Email: epierre@simonteam.com**
Central Safety Manager	**Steve Cotton**	**Day: 307-286-2398** **Email: SCotton@simonteam.com**
East Region Manager	**Rod Lanka**	**Day: 308-289-0389** **Email: rlanka@simonteam.com**
East Safety Manager	**Jessica Gann**	**Day: 307-631-8182** **Email: JGann@simonteam.com**
North Region Manager	**Jake Hepp**	**Day: 605-718-7503** **Email: jhepp@simonteam.com**
North Safety Manager	**Larry Rinehart**	**Day: 308-520-6361** **Email: LRinehart@simonteam.com**

INSURANCE and RELATED SERVICES

SERVICE	CONTACT INFORMATION
Liberty Mutual Insurance	24 Hours: 800-362-0000
Liberty Mutual Worker's Comp	Night: 800-362-0000
Liberty Mutual Auto and General Liability	800-362-0000
REACH (EAP)- Employee Assistance	24 Hours: 800-950-3434

EMERGENCY SERVICES

SERVICE	CONTACT INFORMATION
EMS, Fire, Ambulance, Police	24 Hours: 911
Hospitals	See Project/Plants Data Sheets
Occ. Med and Health Clinics	See Project/Plants Data Sheets
Poison Control	24 Hours: 800-222-1222
Center for Disease Control	24 Hours: 800-232-4636
FEMA	24 Hours: 800-621-3362
American Red Cross	24 Hours: 1-800-RED-CROSS
Environmental Remediation	****Will locate a spill response company and make contact for project's geographic area.** ***OR:*** 24 Hours- Call "911" ****911 will connect you to local county emergency management agency.**
National Oil and Spill Response Center	24 Hours: 800-424-8802

UTILITY COMPANIES

SERVICE	CONTACT INFORMATION
Electric	See Project/Plants Data Sheets
Gas	See Project/Plants Data Sheets
Water/Sewer	See Project/Plants Data Sheets
Communications (phone, cable, etc.)	See Project/Plants Data Sheets

GOVERNMENTAL AGENCIES/OFFICES

SERVICE	CONTACT INFORMATION
Federal OSHA- Fatal or hospitalization	24 Hours: 800-321-6742
Federal OSHA Offices	Wyoming – (307) 777-7786 Nebraska – 800-642-8963 Colorado – (720)-264-6550 South Dakota – (605)-251-2021
State OSHA	See Project/Plants Data Sheets
MSHA- Accidents	24 Hours: 800-746-1553
State Dept. of the Environment (DEP) **Region 7** **Region 8**	NEBRASKA: 800-223-0425 COLORADO: 800-227-8917 SOUTH DAKOTA 800-227-8917 WYOMING: 800-227-8917

DISCIPLINARY ACTION POLICY	SECTION 6	
	EFFECTIVE DATE January 03, 2022	PAGE 1 of 3

1.0 POLICY

It is the policy of SIMON, Inc. that all employees are expected to comply with SIMON' standards of behavior and performance. Any noncompliance with these standards must be remedied. Some examples might be a violation of a safety requirement, policy or procedure in this Corporate Safety Manual, performance standards, productivity requirements, Human Resource related employee work rules and conduct, etc. It is the SIMON Supervisor/Manager's responsibility to monitor an employee's performance. In the event that an employee should violate any company policy, requirement, or fail to perform at an acceptable level the following progressive disciplinary process will be used: **Verbal Warning, Written Warning, Suspension, or Termination of Employment.**

SIMON endorses a policy of progressive discipline to provide employees with notice of deficiencies and an opportunity to improve. It does, however, retain the right to administer discipline in any manner it sees fit, and may choose to expedite the progressive disciplinary process as it deems necessary.

1.1 If an employee does not meet company standards of behavior or performance, the employee's Supervisor is required to take the following actions which include, but it not limited to:

1.1.1 Meeting with the employee to discuss the matter.

1.1.2 Informing the employee of the nature of the problem and the action necessary to correct it.

1.1.3 Preparing a Disciplinary Action Form indicating a verbal warning and sending the form to the SIMON Human Resources Department. The Disciplinary Action Form is in Appendix 6A of this program.

1.2 If there is a second occurrence, the Supervisor is required to hold another meeting with the employee and take the following actions in a timely manner:

1.2.1 Issue a written warning to the employee.

1.2.2 Warn the employee that a third incident will result in more severe disciplinary action.

1.2.3 Prepare a Disciplinary Action Form with a written report describing the first and second incident. Summarize the action taken during the meeting with the employee, and forward the report to the SIMON Human Resources Department.

1.3 For additional occurrences, the Supervisor must take the following action:

1.3.1 Suspend the employee without pay for up to five working days; or

1.3.2 Suspend the employee indefinitely and recommend termination.

The Director of Human Resources must review and concur with all recommendations for suspension and termination before final action is taken. In cases involving serious misconduct, such as a major breach of a policy or violation of law, the progressive disciplinary procedure may be accelerated. The Supervisor may recommend suspension of the employee immediately, pending final determination, and, if appropriate, recommend termination of employment. Again, the Director of Human Resources must review and concur with all recommendations for suspension and termination.

If an employee believes he/she has been disciplined too severely or without good cause the employee may use the Employee Appeal and Management Review Process which can be done by contacting the SIMON Human Resources Department. At the discretion of the company, an employee's record is normally cleared of any disciplinary incidents if the employee works a full 12-month period or one construction season without further action being taken under this policy.

Violations of or deviations from any safety policies/procedures/processes as outlined in the Corporate Safety Manual must be automatically met with progressive disciplinary action, up to and including termination.

2.0 WORKPLACE RULES

In addition to SIMON' policies/procedures/processes, within SIMON' personnel requirements, there are general workplace rules that must be followed at all times. Any deviation or infraction with regard to these rules must be automatically met with the progressive disciplinary action policy as outlined herein. Violations of or deviations from any of these workplace rules must be automatically met with progressive disciplinary action, up to and including termination. The following behaviors are considered violations of workplace rules:

2.1 SIMON, Inc. and each of its affiliates requires a drug-and-weapon-free workplace at all company locations. Possession, use or sale of illegal drugs (for example, marijuana, cocaine, and prescription drugs not prescribed by a physician) or of any weapon or firearm at work will not be tolerated and is grounds for immediate dismissal. Consumption of alcohol on the work premises is not permitted unless specifically authorized and consultation made with the SIMON Human Resources Director. In addition, employees may not be on any company premises if they are under the influence of or affected by illegal drugs or alcohol.

2.2 Violation of the Company Ethics Policy.

2.3 Distribution of literature during normal working hours or in work areas without prior management approval.

2.4 Posting or removal of notices, signs or writings in any form on any company bulletin board or company property without prior management approval.

2.5 Personal activities or personal work during normal working hours.

2.6 Soliciting or collecting contributions for any purpose during normal working hours without prior management approval.

2.7 Repeated failure to be at your assigned work location and ready to begin work as scheduled.

2.8 Poor and careless work.

2.9 Failure to contact and document with your Supervisor, jobsite or office, by the start of your assigned shift, that you will not be reporting to work, as well as the reason for your absence. (Subject to extenuating circumstances)

2.10 Threatening, intimidating, coercing, or harassing fellow employees in any manner on company premises at any time for any purpose. This includes unprofessional actions against an employee or the public.

2.11 Stopping or leaving work prior to the completion of your assigned shift without extenuating circumstances.

2.12 Faulty work after attention has been called to same.

2.13 Refusal to obey work assignments of your Supervisor that do not violate safe work practices.

2.14 Any concerted or deliberate attempt to control or restrict production (slowdown, delay other workers, etc.).

2.15 Improper use of a company computer.

2.16 Permitting unauthorized persons to drive a company vehicle.

2.17 Fighting or instigating a fight during normal working hours. Any issue of workplace violence will not be tolerated.

2.18 Misrepresentation about material information or falsification of records or reports or divulging information of a confidential nature to unauthorized persons.

2.19 Unauthorized holding of another job.

2.20 Theft of company property or property of other employees.

2.21 Carelessness determined to be flagrant or intentional disregard resulting in an accident/incident, property damage, personal injury, or a near miss.

2.22 The use of mobile phones, cell phones, Nextel's, iPod's, radio headsets, etc., is strictly prohibited in an active field work environment (i.e. - mobile phone use while operating mobile equipment).

2.23 While operating any SIMON motor vehicle, employees are only permitted to use hands-free devices for mobile phones and are not permitted in any other capacity to: use a mobile phone, send or read a text message, and send or read an e-mail while operating the vehicle. If a mobile phone is to be utilized without hands-free the vehicle must be off of the public roadway and legally parked. If texting, e-mailing, etc., needs to be done, the vehicle must be off of the public roadway and legally parked.

3.0 OWNER/CLIENT WORKPLACE RULES AND DISCIPLINARY ACTION

It is requirement for all SIMON Supervisors, employees, and subcontractors to know and abide by the site safety requirements and disciplinary procedures of owners/clients. Specifically, with respect to zero-tolerance items as identified by an owner/client, and/or a safety infraction that may be grounds for a more stringent form of disciplinary action than this policy.

BACKING POLICY	SECTION 7	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This program sets forth the minimum requirements for motor vehicle backing safety at SIMON for all employees operating a company-owned vehicle. This program includes all company-owned motor vehicles and mobile construction equipment.

2.0 PURPOSE

The purpose of this program is to provide general requirements and safe practices to SIMON Supervisory personnel and employees so that they can carry out the requirements and safe practices any time he/she is operating a company owned motor vehicle and/or mobile construction equipment as identified in this program.

3.0 GENERAL REQUIREMENTS

3.1 Backing In or Pulling Through Into Parking Spaces. When parking, any SIMON employee operating a company owned vehicle (car, SUV, pick-up, SUV crossover, and similar vehicles) must either back into or pull through their parking space. This must be done so that when the employee leaves the parking space, the employee only needs to pull forward to exit the space.

This includes all times when any employee is parking a vehicle (e.g. - job-site parking lots and convenience stores). There are two exceptions: the first is an employee's home, and the second is a parking lot where the parking spaces are angled (spaces are not perpendicular to the travel route in the parking lot).

3.2 Construction Job-Site, Plant, and Shop Backing. The safe practice is to minimize the backing (although not always possible) of any company-owned motor vehicle and any mobile construction equipment at any SIMON construction job-site, plant, or shop. SIMON Supervisors should plan their work to minimize the backing of company vehicles and mobile construction equipment. By minimizing the frequency of backing vehicles and mobile construction equipment, SIMON employees are minimizing the potential for having a backing accident.

3.3 Using a Spotter to Back. Due to blind spots, the high frequency of backing with specific operations (e.g. - tri-axles backing into a paver), and the hazardous nature of backing, a spotter may be required to assist a vehicle and/or mobile equipment in backing. A spotter will be required when deemed necessary by the SIMON Supervisor-in-charge or driver/operator on any SIMON owned property, construction project, or plant operation.

3.4 Back-Up Alarm Requirements. All bi-directional construction vehicles (e.g. - tri-axles, slab trucks, commercial motor vehicles, etc.) and mobile construction equipment must be equipped with a functional and audible back-up alarm. The alarm must be able to be heard and clearly distinguishable above the noise level of the vehicle or equipment.

3.5 Window and Mirror Visibility. Windows and mirrors must be maintained in a clean and clear condition for optimal visibility, and without damage or cracks that restrict visibility.

3.6 Mirror Adjustments. For optimal visibility, mirrors must be adjusted and checked prior to operation of any SIMON motor vehicle or mobile construction equipment.

3.7 Scan Mirrors While Backing. Mirrors must be continuously scanned by the driver/operator while backing to provide for optimal visibility.

3.8 Backing Speed. There is no set requirement for backing speed; however, it is required to be done with caution and at a safe and controlled speed.

3.9 Get Out and Look (G.O.A.L.). Prior to backing any SIMON vehicle and mobile construction equipment that has been parked where site conditions could have changed, it is required that the SIMON employee Get Out And Look prior to backing. By getting out and looking, the driver/operator is getting a 360 degree snapshot of what is in the proximity of the vehicle or equipment. This is also required for the driver/operator if the employee leaves the vehicle

or equipment for an extended period of time (e.g.- employee gets out of equipment for a break and gets back in 10 minutes later), meaning that a walk around is required prior to getting in and backing.

CONCRETE WORK	SECTION 8	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 4

SCOPE

This program sets the minimum requirements for the protection of SIMON employees working with concrete at any SIMON work operation and encompasses the requirements of OSHA 29 CFR 1926, Subpart Q - Concrete and Masonry Construction. In addition, this program includes company-specific safety requirements with regards to concrete construction.

PURPOSE

The purpose of this program is to provide technical information for SIMON Supervisory personnel to do the following: meet the OSHA general requirements, meet the requirements for equipment and tools, meet the requirements for cast-in-place concrete, and general requirements for concrete pump operations.

DEFINITIONS

Bull Float: A tool used to spread out and smooth concrete.

Formwork: The total system of support for freshly placed or partially cured concrete, including the mold, sheeting, or form that is in contact with the concrete as well as all supporting members including shores, re-shores, hardware, braces, and related hardware.

Re-shoring: Shoring that is placed in the area where the original forms and shores were removed (stripped), in order to support partially cured concrete and construction loads.

Shore: A supporting member that resists a compressive force imposed by a load.

Vertical Slip Form: A concrete form that is jacked vertically after stripping and re-set for the next concrete pour.

GENERAL REQUIREMENTS

4.1 Construction Loads. No construction loads, load, or weight of any kind may be placed on a concrete structure or portion of a concrete structure unless approved by the SIMON Supervisor-in-charge.

4.2 Fall Protection. Employees exposed to a fall of greater than or equal to 6 feet must be protected in accordance with all requirements of Section 13 **(FALL PROTECTION)** of this manual.

4.3 Housekeeping. Good housekeeping is imperative to prevent injuries when it comes to concrete work. Follow all housekeeping requirements in Section 17 **(HOUSEKEEPING)** of this manual.

4.4 Personal Protective Equipment. SIMON employees must wear PPE as required in Section 25 **(PERSONAL PROTECTIVE EQUPMENT)** of this manual.

4.5 Post-Tensioning Operations. No employees are permitted to be behind the jack during tensioning operations.

4.6 Reinforcing Steel (Re-bar). All protruding reinforcing steel, onto and into which an employee could fall, must be protected as required in Section 13 **(FALL PROTECTION)** of this manual.

4.7 Skin Irritation and Burns. One of the best means of avoiding skin irritation from wet concrete and/or dry concrete is to use good personal hygiene; frequent rinsing and washing of the skin is effective, coupled with a protective barrier cream. Barrier cream only is not recommended.

4.8 Winter Concrete Heating. Follow all requirements outlined in Section 14 **(FIRE PREVENTION AND PROTECTION)** of this manual.

4.9 Work Platforms. Employees working on shoring in stationary positions must have platforms to stand on that are at a minimum of 18" wide.

4.10 Working Under Loads. No SIMON employees are permitted to be under concrete buckets while buckets are being elevated or lowered into position.

REQUIREMENTS FOR EQUIPMENT AND TOOLS

5.1 Power Concrete Trowels. Power trowels that are manually guided must be equipped with an automatic kill switch that works when hand pressure is released.

5.2 Concrete Buggies (e.g. - Georgia Buggies). Concrete buggy handles cannot extend beyond the wheels on either side of the buggy.

5.3 Hammer Drills. Employees must use hammer drills with sufficient bodily force to ensure there is no rotation of the drill itself when the bit gets stuck. Hammer drills can easily break or fracture a wrist or hand when the bit gets stuck.

5.4 Bull Floats. Bull float handles must be constructed of nonconductive material where they may be exposed to energized electrical conductors.

5.5 Concrete Saws. Concrete saws must be guarded with the designed manufacturer's guard.

REQUIREMENTS FOR CAST-IN PLACE CONCRETE

6.1 General Requirements for Formwork.

6.1.1 Concrete formwork must be designed, fabricated, erected, supported, braced, and maintained so that it is capable of supporting without failure all vertical and lateral loads that may reasonably be anticipated to be applied to the formwork.

6.1.2 Drawings or plans, including all revisions, for the jack layout, formwork (including shoring equipment), working decks, and scaffolds, must be available at the SIMON job-site.

6.1.3 Formwork must be selected after careful consideration of loading factors, including spans, setting temperature, rate of pour and working loads that will be supported.

6.2 Shoring and Re-shoring Requirements.

6.2.1 Shoring and re-shores must be used within all of the manufacturer's requirements and specifications and within the design requirements of the formwork drawings for the job.

6.2.2 Shoring equipment, including re-shores, must be inspected by the SIMON Supervisor-in-charge or designee to ensure that the equipment meets the requirements specified in the formwork drawings and the manufacturer's requirements.

6.2.3 Shoring equipment found to be in a deficient condition must be taken out of service immediately.

6.2.4 Shoring may not be used interchangeably with other brands, types, etc., unless it is done within the specifications of the manufacturer.

6.2.5 Erected shoring equipment must be inspected immediately prior to, during, and immediately after concrete placement by the SIMON Supervisor-in-charge or designee.

6.2.6 The formwork must be continuously inspected by the SIMON Supervisor-in-charge or designee during the concrete pour, and corrections and adjustments made as necessary within the specifications of the formwork drawings or manufacturer's specifications.

6.2.7 The sills for shoring must be sound, rigid, and capable of carrying the maximum intended load specified.

6.2.8 All base plates, shore heads, extension devices, and adjustment screws must be in firm contact, and secured when necessary, with the foundation and the form.

6.2.9 Excessive loading on shore heads and similar pieces is prohibited outside of the loading criteria as specified in the formwork drawings.

6.2.10 Any adjustments made to post shores must be made within the specified criteria of the form work drawings.

6.2.11 Re-shoring must be erected as the original forms and shores are removed and whenever the concrete is required to support loads in excess of its capacity.

6.2.12 Shores and re-shores must be secured to prevent from falling over if incidentally or accidentally struck, or when the load is released.

6.3 Reinforcing Steel.

Reinforcing steel for walls, piers, columns, and similar vertical structures must be adequately supported to prevent overturning and to prevent collapse. In addition, reinforcing steel must be sufficiently tied together prior to lifting pieces (e.g.- re-bar mat for a large wall or pier) and lifting overhead to position into place, so that it will not fall apart and injure an employee.

6.4 Stripping Formwork.

6.4.1 Formwork and shores, except those used for slabs on grades, curbs, sidewalks, etc., must not be removed until the concrete has come up to the required cure strength (p.s.i.) or required waiting period.

6.4.2 Re-shores are not to be removed until the concrete being supported has come up to the required cure strength (p.s.i.) or required waiting period.

6.4.3 Stripped forms and shoring must be removed, cleaned, oiled, and stockpiled promptly after stripping.

6.5 Concrete Pours.

6.5.1 All employees must wear PPE as required in Section 25 **(PERSONAL PROTECTIVE EQUIPMENT)** of this manual.

6.5.1 Employees should keep pant legs inside of boots and the boot straps tightened. This will keep concrete from getting into boots. If concrete gets into an employee's boots, then the employee is required to take off the boots immediately and wash out the boot and the affected leg area.

6.5.2 Employees are not permitted to ride concrete buckets.

6.5.3 Employees are not permitted to grab fast swinging buckets.

6.5.4 Employees should not position themselves between a stationary object (e.g. - concrete wall) and where the concrete bucket is going. This will eliminate a crush hazard.

6.5.5 Employees are not permitted to walk under or stand directly underneath concrete buckets.

GENERAL CONCRETE PUMP REQUIREMENTS

7.1 Concrete Pump Set-Up. The concrete pump must be set-up on the job with consideration given to good access to pour and the corresponding boom angle, good access to the ready-mix trucks to minimize backing, and consideration given to overhead power lines with respect to the requirements in Section 24 **(OVERHEAD POWER LINES)** of this manual.

7.2 Concrete Pumping Systems. Concrete pump systems with discharge pipes must be provided with pipe supports designed for 100% overload. In addition, air hoses used with concrete pumping systems must be provided with positive fail-safe joint connectors to prevent separation of sections when pressurized.

7.3 Outriggers. Outriggers must always be fully extended and placed on pads when determined necessary by the pump truck operator.

7.4 Clean-Up Operations. Pipe blockages can cause serious and fatal injuries. It is critical that the pump truck operator utilize the clean-out ball (e.g.- rabbit, or pig) to effectively clean-out the pipe in accordance with the manufacturer's guidelines. A catch basket must be used at the end of the line to catch the clean-out ball. At any time there is a blockage, all air and water pressure must be bled out of the pipe system and pipes disconnected prior to any work commencing.

7.5 General Pump Safety Requirements.

7.5.1 Never use the pump truck boom in place of a crane to lift loads.

7.5.2 Never move a pump truck with the boom extended.

7.5.3 At no time can the hopper grate be removed while the pump is in operation.

7.5.4 No employee is permitted to place their hands into the hopper to remove debris or equipment without first shutting the pump down and locking it out in accordance with the manufacturer's requirements.

7.5.5 Pump pipes are not to be secured to formwork due to vibration and pressure surges.

7.5.6 Always secure sections of vertical pipe.

7.5.7 Pipe should always be vertical, not laying transversely or diagonally when ascending and descending.

7.5.8 No one is permitted to stand on the pump truck hopper grate.

1.0 SCOPE

This program sets the minimum requirements to be followed by SIMON Supervisors and personnel when entering confined spaces and permit-required confined spaces. In addition, this program encompasses the requirements of OSHA 29 CFR1926.1200, Subpart AA, and OSHA 29 CFR 1910.146, Subpart J.

2.0 PURPOSE

The purpose of this confined space program is to provide technical and procedural information for SIMON Supervisory personnel to do the following: meet all defined criteria of a permit-required confined space to ensure safe entry and exit, meet the training requirements, and fulfill all other OSHA requirements set forth in the regulations pertaining to confined spaces.

3.0 DEFINITIONS

Acceptable Entry Conditions: The conditions that must exist in a permit-required confined space to allow entry. Also this means to ensure that employees involved with a permit-required confined space entry can safely enter into and work within.

Annual Confined Space Program Review: Annually the SIMON Safety Department will perform a review on the Confined Space Program and prior year's permits to ensure its adequacy and effectiveness. Updates to this program will be made if necessary.

Attendant (Watcher): Means the trained SIMON employee designated by the SIMON Supervisor-in-charge to be stationed outside the entrance to the confined space(s) and perform the duties as specified in this program.

Competent Person: The competent person is the on-site SIMON Supervisor-in-charge of conducting confined space entries and who through training, education, and experience is knowledgeable about criteria required in this program. This SIMON Supervisor will also be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees, and this SIMON Supervisor does have the authority to take prompt corrective action to ensure the work as required by this program is safe.

Confined Space: A space that is large enough and so configured that a SIMON employee can enter and perform assigned work; the space has limited or restricted means for entry or exit (e.g. - tanks, vessels, silos, deep inlets, underpinning pit, storage bins, hoppers, man holes, driers at the asphalt plants, baghouse, pits, etc.); and is not designed for continuous employee occupancy.

Confined Space Classification Guidelines: Guidelines are in Appendix 9A of this program. These guidelines may be utilized by the SIMON Supervisor to aid them in determining the classification of the confined space to be entered (i.e. - Permit Required, Non-Permit Required, Forced Air Ventilation Only).

Confined Space Entry Permit: The written document in Appendix 9B which must be used and completed by the SIMON Supervisor and attendant for every permit-required confined space entry. The permit is an authorization and approval in writing that specifies the type of work to be done and the location, and certifies that all existing hazards have been evaluated by the SIMON Supervisor and that all necessary protective measures have been taken to ensure the safety of each SIMON employee.

Entrant: The trained SIMON employee who has been authorized by the SIMON Supervisor to enter a permit-required confined space.

Entry: Is when any part of an employee's body breaks the plane of an opening into the confined space.

Entry Supervisor: The trained SIMON Supervisor-in-charge of the job or work operation and who is responsible for determining if acceptable entry conditions are present at any confined space where entry is planned. In addition, the Supervisor is responsible for authorizing entry and overseeing entry operations, and for terminating entry as required by this program.

Hazardous Atmosphere: An atmosphere that may expose SIMON employees to the risk of death, serious impairment, inability to rescue themselves, injury, or acute illness from one of the following causes in the table below:

AIR QUALITY OR AIR CONTAMINANT	DANGEROUS AIR LEVELS
Flammable Gas, Vapor, or Mist	≥ 10% of the Lower Flammable Limit (LFL)
Hydrogen Sulfide (sewer gas)	>10 parts per million
Oxygen	Oxygen Deficient= < 19.5% Oxygen Enriched= > 23.5%
Carbon Monoxide	Above Action Level= ≥ 35 parts/million
Atmospheric Concentration of Hazardous Substances in OSHA Subpart D, G, or Z	Any level in excess of allowable dose or OSHA PEL
Any other potentially hazardous atmospheric condition that is Immediately Dangerous to Life and Health	As defined by OSHA standards

IDLH Work: Immediately Dangerous to Life and Health (IDLH) work is not permitted for SIMON employees. If this situation comes up, then coordinate with the SIMON Safety Department. An outside firm will be utilized to perform any IDLH entry, and Emergency Services must be on-site 100% of the time while the entry is performed.

Non-Permit Required Confined Space: Means a confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm. A confined space may only be declassified to a non-permit-required confined space by the SIMON Supervisor. **This program does not apply to non-permit-required confined spaces.**

Other Spaces: This refers to spaces that may not meet the definition of a confined space; however, the space can have the potential for a hazardous atmosphere. Examples of this would be work being conducted at treatment plants, which can include but is not limited to: underground vaults, underground structures, enclosed structures, pump rooms, electrical rooms, etc., where there could potentially be a hazardous atmosphere due to the nature of work from off-gassing of byproducts from plant operations. The requirements of this program will apply to these spaces.

Permit-Required Confined Space: A confined space that has one or more of the following characteristics:

- Contains or has the potential to contain a hazardous atmosphere
- Contains a material that has the potential for engulfing an entrant
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section (e.g.- silo)
- Contains any other recognized serious safety or health hazard

Rescue: The process for extracting SIMON employees from a permit-required confined space (e.g. - tripod, retrieval winch and line, and body harness, or the local fire department rescue services). There are two types of rescue-- entry and non-entry. **SIMON employees are not permitted to perform entry rescue.**

Retrieval System: The only equipment SIMON personnel are permitted to use for non-entry rescue. This consists of a tripod or similar device, winch and line, body harness, anklets, and/or wristlets, etc.

4.0 EMPLOYEE TRAINING

Every SIMON employee participating in any permit or forced air ventilation/monitoring confined space entry will receive safety and health training prior to performing any confined space work that covers all requirements of this program and the related OSHA standards.

This training will also include the following: air monitoring and acceptable levels, flammable and combustible gases, general lock- out/tag-out safety, general entry requirements, general safe work practices, retrieval/rescue, and confined space permits. This confined space training will be completed during the winter training months, as needed throughout the construction season, and it will be supplemented periodically in the tool-box meetings. It is the responsibility of the SIMON Supervisor to ensure through the SIMON Safety Department that their employees have received the training prior to performing any confined space work and prior to initial assignment.

All confined space training is documented at the time of training, and training records are maintained by the SIMON Safety Department. A proficiency test will be given to the trainee, and the employee must successfully pass. In addition, site-specific safety training may be required. Refresher training will be mandated when determined by the Area Manager and/or the SIMON Safety Department. Confined space training will also be completed if an employee has a change or significant change in assigned duties that would affect his/her safety performance without the safety training, and when any new hazard outside of normal routine working conditions exists, or when a significant deviation in the type of work occurs that could impact employee safety and health.

5.0 GENERAL SAFETY PREPARATION FOR A CONFINED SPACE ENTRY

5.1 Posting of permit-required confined spaces. It is the responsibility of the SIMON Supervisor-in-charge to ensure that the HMA plants and treatment plant construction projects all have signs reading "DANGER: PERMIT-REQUIRED CONFINED SPACE. DO NOT ENTER" posted at the entrance to every permit required confined space.

5.2 Smoking or Open Flames. Smoking is not permitted in any type of confined space.

5.3 Isolation/Lockout/Tagging (Zero Energy State). It is the responsibility of the SIMON Supervisor-in-charge to ensure that isolating/locking-out/tagging is in place, verified, and meets all criteria set forth in Section 20 **(LOCK-OUT/TAG-OUT)** of this manual. General zero energy state procedures are as follows:

5.3.1 Zero Energy State. Zero energy state must be verified by the SIMON Supervisor.

5.3.2 Blocking/Bleeding/Blanking. Confined spaces will be completely isolated from all other systems by physical disconnection, double block and bleed, or blanking off all lines as determined by the SIMON Supervisor. This will be done to prevent solids, liquids, vapors, or gases from entering the confined space while employees are working inside. Blocking/bleeding/blanking of lines is the preferred method of isolation.

5.3.3 Bleeding Off Air Lines. All air lines that may cause an accidental startup must be bled off.

5.3.4 Shut-off valves. Valves serving a confined space will be locked in the closed position and tagged for identification.

5.3.5 Pumps and Compressors. Pumps and compressors serving the lines entering a confined space will be brought to a zero energy state to prevent accidental start-up.

5.3.6 Electrical Isolation. Electrical isolation of a confined space must be completed to prevent accidental start-up of moving parts, including but not limited to: agitators, hi/low level probes, pumps, pug mills, and mechanical mixers. This will be done by locking and tagging circuit breakers and/or disconnects in the open/off position.

5.3.7 Mechanical Parts. Equipment with moving mechanical parts will also be blocked or secured in such a manner that there can be no accidental rotation.

5.4 Equipment and Tools. It is the responsibility of the SIMON Supervisor to ensure that equipment and tools used in a confined space be carefully inspected and meet the following requirements:

5.4.1 Hand Tools. Hand tools must be kept clean and in good condition and non-sparking if deemed necessary by the SIMON Supervisor.

5.4.2 Electrical Cords. All electrical cords must have heavy-duty insulation.

5.4.3 Electrical Tools and Equipment. All electrical tools and equipment used in a confined space must be plugged into a GFCI located outside the confined space.

5.4.4 Portable Lighting. If the potential for an explosive atmosphere exists, all lighting must be explosion-proof in design and must be UL rated.

5.4.5 Oxygen, Acetylene, or other Gas Cylinders. Cylinders are not permitted in a confined space.

5.4.6 Welding and Cutting Torches. Welding and cutting torches may only be taken into a confined space when they will be used, and immediately following completion of work, they must be taken out of the confined space. This includes all gas hoses.

5.5 Fall Protection. Any time there is an opening into a confined space, the Fall Protection Program in Section 13 of this manual must be followed. An example is that guardrails or a hole cover must be placed around a man-hole greater than or equal to 6 feet deep.

6.0 PERMIT-REQUIRED CONFINED SPACE ENTRY

This section outlines all criteria required for a SIMON Supervisor to successfully conduct a permit- required entry into a confined space. All confined space entries at SIMON will be permit entries, unless the SIMON Supervisor follows all requirements of this program and classifies the space in one of the following three ways:

1. Non-permit confined space- refer to heading 7.0.
2. Declassifies the space from permitted to non-permitted- refer to heading 8.0.
3. Forced air ventilation (air blower) alone will ensure that the confined space is safe for entry. This must be accompanied by continuous air testing and monitoring (e.g. - shallow man-hole 8 to 12 feet deep); refer to heading 9.0.

The requirements of a permit-required entry are as follows:

6.1 Entry Permit. The confined space entry permit in Appendix 9B must be completed in all applicable areas prior to work by the SIMON Supervisor and signed by the SIMON Supervisor prior to entry. The confined space permit must be posted at the entrance to the space during the entry. The attendant will continuously update the permit throughout the entry. When work is completed, the entry permit must be cancelled and kept with the project files, where it must be retained for a period of at least 1 year. A copy of the cancelled permit must be forwarded into the regional Safety Manager.

6.2 SIMON Supervisor Responsibilities. The SIMON Supervisor is responsible for the following:

6.2.1 Completing all pre-entry requirements on the permit prior to authorizing entry.

6.2.2 Knowing the hazards that may be faced during the entry, including all atmospheric hazards, and acknowledging the consequences of a SIMON employee being overexposed.

6.2.3 Checking on the attendant to ensure he/she is completing the entry permit properly and accurately.

6.2.4 Terminating the entry upon completion of work, expiration of a permit, or if a condition arises in or near the permit space that places employees at risk. Additionally, ensure that permits are reissued or updated before authorizing re-entry into the confined space.

6.2.5 Removing unauthorized individuals who enter or who attempt to enter the permit space.

6.2.6 Monitoring work operations to ensure that all requirements on the permit are being met and that acceptable entry conditions are being maintained.

6.2.7 Instructs all authorized entrants and attendants in the requirements of this program. The SIMON Supervisor must also ensure that all personnel involved with the permit entry are trained in the proper use of the non-entry retrieval equipment, evacuation, and rescue procedures.

6.3 Attendant Responsibilities (Watcher). The SIMON employee(s) assigned as an attendant is permitted to attend to more than one space as long as it is determined to be safe by the SIMON Supervisor. Under no circumstance is the attendant permitted to perform any type of rescue other than non-entry rescue. Emergency entry rescue will be completed by the rescue service designated on the permit. This individual is responsible for the following:

6.3.1 Knowing the hazards that may be encountered during entry, including information on the signs or symptoms and consequences of any potential exposure.

6.3.2 Utilizing the combustible gas meter and monitoring the atmosphere inside of the confined space while remaining on the outside.

6.3.3 Maintaining a continuous count of authorized entrants in the permit space.

6.3.4 Remaining outside the permit space during entry operations until relieved by another attendant. If the attendant must leave the area for any reason and there is no relief attendant, then all entrants must exit the permit space until the attendant returns or another one is assigned.

6.3.5 Staying in communication with the entrants and alerting the entrants of the need to exit the permit space.

6.3.6 Alerting rescue personnel (911) and must act if necessary.

6.3.7 Warning unauthorized personnel that they must stay away from or exit the permit space.

6.3.8 Performing no duties other than fulfilling the attendant's responsibilities.

6.4 Entrant Responsibilities. The SIMON employees required to enter the permit space have the following responsibilities:

6.4.1 Obtain authorization from the SIMON Supervisor to assure that he/she is an authorized entrant and obtain authorization to enter a confined space.

6.4.2 Know the hazards that may be encountered during entry and knows the signs or symptoms and consequences of any potential exposure.

6.4.3 Ensure that an entry permit has been issued for the confined space and that all requirements of the permit have been met.

6.4.4 Know how to use the retrieval equipment and be hooked up to the retrieval system 100% of the time while in the confined space.

6.4.5 Know the procedures for communication with the attendant.

6.5 Testing and Monitoring the Atmosphere.

6.5.1 Monitoring the Atmosphere. For most permit-required confined space entries at SIMON, a 4-gas combustible gas meter (Oxygen, Flammable Gases, Hydrogen Sulfide, and Carbon Monoxide) will be utilized to monitor the atmosphere inside of the permit space. Monitoring will be continuous and done by the attendant or entrant (personal monitor).

6.5.2 Special Cases. For special cases atmospheric hazards not covered by the 4-gas meter, the SIMON Supervisor must contact the SIMON Safety Department in a timely manner to obtain the appropriate air monitoring equipment.

6.5.3 Calibrating the Air Monitoring Equipment. The SIMON Supervisor must ensure that the air monitoring equipment is properly calibrated and in compliance with the manufacturer's guidelines for calibration. Calibration will be done by designated personnel in the region and/or the SIMON Safety Department.

6.6 Ventilation. For all permit-required confined space entries, the use of a forced air blower is required where air quality and air contaminant hazards are an issue. For larger spaces, multiple blowers may be required. The SIMON Supervisor must consult with the SIMON Safety Department so that an appropriate number of forced air blowers can be determined prior to the entry.

6.6.1 Direction of Forced Air Ventilation Flow. The direction of air flow from the blower depends on the type of work being performed. In most cases, air will be forced into the confined space; however, in cases where paints, epoxies, or adhesives are being applied, forced air may lead to a greater hazard by causing the material to dry faster, thus a higher air concentration of contaminants. In cases where materials will be applied to the inside of a confined space, the SIMON Supervisor is required to consult with the SIMON Safety Department.

6.7 Non-Entry Retrieval and Rescue. The only type of confined space rescue permitted to be performed by SIMON employees is through the use of a tri-pod, winch and retrieval line and pulley, full body harness, and anklets/wristlets, where the attendant winds up the already attached SIMON employee entrant. Entry for rescue is not permitted.

6.7.1 Entry Rescue- 911 System Rescue through Emergency Personnel or Designated Service. Any time a Permit-Required Confined Space Entry will be done, the SIMON Supervisor must contact the local

fire/emergency response department to inform them of the type of work to be performed prior to any work being done. The local 911 emergency services must be informed of the type of work and requested to come out and see the type of work that is going to be performed and examine the job. The 911 emergency services have the right to decline to come out to see the job. If entry rescue services are unavailable, entry cannot proceed.

6.7.2 In all cases of confined space rescue (permit, non-permit, reclassified, and forced air/monitoring) other than non-entry rescue, it is the responsibility of the attendant and/or SIMON Supervisor to notify the 911 system of the emergency situation. **Under no circumstances is any SIMON employee permitted to enter any type of confined space to perform a rescue.**

7.0 NON-PERMIT REQUIRED CONFINED SPACE

This program does not apply to non-permit required confined spaces as defined in heading 3.0. The SIMON Supervisor must be able to classify a confined space as a non-permit space according to the definition. If there is any doubt whether the space is permit or non- permit while classifying, the SIMON Supervisor must consult with the SIMON Safety Department for a final decision. Once classified as a non- permit required space, it is the responsibility of the SIMON Supervisor to continuously evaluate the non-permit space for potential hazards and any conditions that warrant re-classifying the space to permit-required.

Two examples of non-permit required confined spaces are as follows: new man-hole installations where they have not been back-filled and air is flowing freely through the man-hole; and a tank where large diameter holes are cut in the sides and air is flowing freely through the tank (similar to the outdoor environment), and employees will be working in the tank.

8.0 PERMIT-REQUIRED RECLASSIFIED TO NON-PERMIT-REQUIRED

8.1 Reclassifying to Non-Permit, No Atmospheric Hazard and Other Hazards Eliminated. The required space may be reclassified to a non-permit space if it poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated without entry into the space, for as long as the non-atmospheric hazards remain eliminated. If the space is reclassified then heading 7.0 (Non-Permit Required Confined Space) applies. The reclassification must be documented by using Appendix 9A (**CONFINED SPACE CLASSIFICATION GUIDELINES***).*

8.2 Combustible Gas Meter Pre-Entry and Periodic Readings. Monitoring must occur both before every entry and continuously. If at any time levels are not within the normal range, then the space automatically becomes a permit space, and all requirements in heading 6.0 (Permit Required Confined Space) must be met at all times.

8.3 Hazards Arise in the Non-Permitted Space. If hazards arise in the reclassified non-permit space, then all employees must exit the space, and a re-evaluation must be completed by the SIMON Supervisor consulting with the SIMON Safety Department as to whether the space will be permit or non-permit. If there is any doubt, then the space will automatically be classified as a permit space.

8.4 Documentation. All requirements of this program must be documented by the SIMON Supervisor on the Daily Hazard Assessment (HASP).

9.0 RECLASSIFY TO FORCED AIR VENTILATION ONLY (ALTERNATE ENTRY)

9.1 Forced Air Ventilation Only (Alternate Entry). Forced Air Ventilation Entry will apply when the SIMON Supervisor conducts the pre-entry readings and the oxygen levels are not within normal range (19.5 to 23.5%) and all contaminants are not at zero. For a SIMON Supervisor to allow entry into a confined space by forced air ventilation only, the following requirements must be met:

9.1.1 Forced Air Ventilation (Air Blower). The air blower must be utilized 100% of the time for purging both prior to entry and while an entry is occurring.

9.1.2 Air Monitoring and Testing. Continuous monitoring must occur before and during every entry. If at any time levels are not within the acceptable range, then the space must automatically be re-classified as a permit-required space, and all requirements in heading 6.0 (Permit-Required Confined Space) must be met.

9.1.3 Safe Exit. Employees must safely be able to exit in the event that the Forced Air Ventilation stops working.

9.1.4 Other Requirements. In addition to air monitoring and forced air ventilation requirements, the requirements of headings 6.2 (Supervisor responsibilities), 6.5 (testing and monitoring), 6.6 (ventilation).

9.2 Documentation. All requirements of this program must be documented by the SIMON Supervisor by using Appendix 9A **(CONFINED SPACE CLASSIFICATION GUIDELINES).**

10.0 SUBCONTRACTORS AND OTHERS WORKING IN SIMON CONFINED SPACE

It is the responsibility of the SIMON Supervisor to ensure that adequate planning has taken place prior to entry into a confined space by SIMON employees, subcontractors, and others (i.e.- inspector, owners) prior to any work being performed. It is the responsibility of the SIMON Supervisor to verify that the subcontractor employees have received Confined Space safety training prior to performing any work in a confined space. If the confined space work requires SIMON employee entry and subcontractor entry at the same time, then the SIMON Supervisor must contact the SIMON Safety Department to ensure that all requirements have been met. A final decision will be made by the SIMON Supervisor for personnel to work off of one permit, or for multiple company permits to be utilized. Coordination of all safety precautions must be made prior to any entry.

All job-site employees must be notified of the permit-required confined space entry work being conducted, as well as of the locations of permit-required confined spaces on-site. This must be documented.

11.0 EXTERNAL HAZARDS/WORK ZONE SAFETY

It is imperative that the SIMON Supervisor ensures that all external safety issues are addressed outside of any confined space that work is being performed within, which includes but is not limited to work zone safety/pedestrian safety, and mobile equipment and construction vehicles on the move. All requirements for work zone and traffic control requirements are addressed in Section 36 (**WORK ZONE AND TRAFFIC CONTROL DOCUMENTATION REQUIREMENTS**) of this manual. Mobile equipment and construction vehicle requirements are addressed in Section 21 (**MOBILE EQUIPMENT AND CONSTRUCTION VEHICLES**) of this manual.

CONFINED SPACE CLASSIFICATION GUIDELINES	APPENDIX 9A	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

The answers to this checklist must be documented on either this form		
Name:	Signature:	
Date: Description of Space:		
Location of Space:		

Is it a Confined Space? *If you answer yes for all 3 items below, it is a confined space.*		
The space is large enough and so configured that a SIMON employee can enter to work.	Yes	No
The space has limited or restricted means for entry or exit.	Yes	No
The space was not designed for continuous human occupancy.	Yes	No

Is it a Dangerous Confined Space? *If you answer yes to any 1 of the 4 questions below it is a* Permit-Required Confined Space.		
Does it have an internal configuration such that an entrant could be trapped or suffocated by inwardly converging walls or by a floor which slopes or tapers to a smaller cross section?	Yes	No
Does it contain a material that has the potential for engulfing (*burying, drowning*) an entrant?	Yes	No
Does it contain any other recognized serious safety or health hazard?	Yes	No
Does it contain or have the potential to contain a hazardous atmosphere? *(perform tests below)*	Yes	No

AIR QUALITY	Acceptable levels	Pre-entry results	Time	Initials	Additional Results	Time	Initials
Oxygen	19.5% - 23.5%						
LEL	Less than 10%						
Carbon Monoxide	Less 35 ppm						
Hydrogen Sulfide	Less than 10 ppm						
Other	Contact safety dept.						

How will you deal with the confined space? *Select one of the 5 options below.*	
❑ I answered no to the above questions so it is a non-permit space and can be entered without special precautions.	Non-permit space

❑ I found a hazard or hazards in the space, but that hazard or hazards will be eliminated from the space before entry, so it can be reclassified as a non-permit space. (This may require LO/TO, purging, reconfiguring, etc.). **Attach documentation.**	Reclassified as Non-permit space
❑ The only hazard that cannot be eliminated is the atmosphere, but that will be kept safe by using a **blower continuously,** so the space can be entered under the forced air ventilation only requirements. A **gas meter** will also be used to continuously monitor the atmosphere. **Attach documentation.**	Continuous forced air ventilation and monitoring
❑ There is a hazard that cannot be eliminated or controlled with ventilation, so the space will be entered as a Permit-Required Confined Space. **You must complete the Confined Space Entry Permit in Appendix 9B**	Permit Entry
❑ The space meets the definition of a Permit-Required Confined Space, but no one will be allowed to enter it, and a sign prohibiting entry will be posted.	No entry allowed

If at any time the SIMON Supervisor is unsure of the correct way to classify the Space, then the SIMON Safety Department must be consulted before work begins.

CONFINED SPACE ENTRY PERMIT *(on following page)*	**APPENDIX 9B**	
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CONFINED SPACE ENTRY PERMIT

Job #:_____ Project Name:_____ Date: _____

Confined space location and description: _____

Authorized Entrants: _____

Authorized Attendants: _____ _____

Communication Method: ☐Voice ☐Radio ☐Visual ☐Other _____

List Known Hazards and actions taken to control (e.g. LO/TO, Ventilation, material removal, etc.):

_____

_____

List safety and non-entry rescue equipment required:

_____

_____

AIR QUALITY	Acceptable levels	Pre-entry result	Additional Results	Additional Results	Additional Results	Additional Results	Additional Results
Oxygen	19.5% - 23.5%						
LEL	Less than 10%						
Carbon Monoxide	Less 35 ppm						
Hydrogen Sulfide	Less than 10 ppm						
Other	Contact Safety Dept.						
Testers Initials and TIME:							

**** Continuous monitoring is always required and must be documented 1 time per hour at a minimum.**

Person Completing Air Testing (print name): _____

Emergency Service for Entry Rescue:_____ Phone: _____

Availability of service has been verified for duration of permit: ☐Yes ☐ No

Supervisor Name:_____ Signature:_____

Date: _____ Time: _____

This permit is not valid until signed by the entry Supervisor. Entry permit is only valid for 1 shift. If hazards not on this permit arise, entry must be terminated and new permit developed. If the rescue service becomes unavailable, the entry must be terminated. A copy of all completed permits must be sent the SIMON safety dept.

1.0 SCOPE

This program sets the minimum criteria for all mobile cranes used on any property and/or construction job-site that is owned or leased by SIMON. The requirements set forth in this program are inclusive of SIMON cranes, rental cranes, and subcontractors utilizing cranes on any SIMON owned property and/or construction job-site. It also sets forth the requirements for SIMON employees operating cranes. Additionally, this program encompasses the requirements of OSHA 29 CFR 1926.1400, Subpart CC- Cranes and Derricks in Construction, and requirements of the NCCCO (National Commission for the Certification of Crane Operators).

2.0 PURPOSE

The purpose of this crane program is to provide technical information for SIMON Supervisory personnel to do the following: meet all of the OSHA and SIMON crane requirements of this program, to know what is required in regards to rental and subcontractor cranes, to ensure that a SIMON crane operator meets the requirements of this program, and to ensure that all Critical Lift Criteria are in place and the Critical Lift Procedure is followed as required in this program.

3.0 DEFINITIONS

Assembly/Disassembly Director (A/D Director): The SIMON crane operator who is considered to be the competent person and qualified person as defined by OSHA for all assembly/disassembly work associated with SIMON cranes. The A/D Director is in charge of all assembly/disassembly operations associated with cranes on any SIMON project and/or job-site. For rental cranes and subcontractor cranes where assembly/disassembly work is done by someone other than SIMON, then that company is responsible for having an A/D Director.

Competent Person: The competent person is the on-site SIMON Supervisor and the SIMON crane operator conducting the work who through training, experience or NCCCO operator certification is knowledgeable about the OSHA and SIMON requirements, the crane manufacturer's specifications, crane inspection criteria, the SIMON Critical Lift Procedure, general safe operating practices, and requirements of this program and OSHA 29 CFR 1926, Subpart CC-Cranes and Derricks in Construction.

This SIMON Supervisor and SIMON crane operator will also be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees, and this SIMON Supervisor does have the authority to take prompt corrective action to ensure the work pertaining to cranes is safe.

CCO Operator: A crane operator who is certified through the NCCCO in one of the 4 specialty areas.

Crane Operator: A crane operator not certified through the NCCCO.

Critical Lift: Any tandem lift; any load weighing 70,000 lbs. in combination with a crane loaded at or in excess of 80% of its capacity; a lift in close proximity to an energized high voltage power line; lifting operations over any public transportation system (e.g. - turnpike, Amtrak/any railroad tracks, toll roads, interstates, etc.; and at the discretion of the SIMON Area Manager.

Dedicated Spotter: (Power lines) To be considered a dedicated spotter, an employee must first meet the requirements of Signal Person as required in this program. His or her sole responsibility is to watch the separation between the power line and the equipment, load line and load (including rigging and lifting accessories), and to ensure through communication with the operator that the applicable minimum approach distance to the overhead power line is not breached.

Fall Zone: The area (including but not limited to the area directly beneath the load) in which it is reasonably foreseeable that partially or completely suspended materials could fall in the event of an accident.

NCCCO: National Commission for the Certification of Crane Operators, (NCCCO) was formed in January 1995 as a non-profit organization to develop effective performance standards for safe crane operation to assist all segments of

general industry and construction. The NCCCO is the governing body who oversees CCO certification of crane operators.

Nonconductive: The property of not becoming energized (that it has high dielectric properties which offer a high resistance to the passage of current under the conditions of use) because of the nature and condition of the materials used, and the conditions of the object in question. For example, polypropylene rope is nonconductive.

Qualified Person: A person who, by possession of a recognized degree, certificate or professional standing, or who by extensive knowledge, training, or experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work or the project.

Rated Capacity: The maximum working load permitted by the manufacturer under specified working conditions. Such conditions typically include a specific combination of factors such as equipment configuration, radius, boom length and other parameters of use.

Registered Professional Engineer: A person who is registered as a professional engineer in the state where the work is to be performed.

Tagline: A rope (usually fiber) attached to a lifted load for purposes of controlling load spinning and pendular motions or used to stabilize a bucket or magnet during material handling operations. Taglines must be non-conductive.

Two blocking: A condition in which a component that is uppermost on the hoist line such as the load block, hook block, overhaul ball, or similar component, comes in contact with the boom tip, fixed upper block or similar component. This binds the system, and continued application of power can cause failure of the hoist rope or other components.

4.0 GENERAL REQUIREMENTS

4.1 Manufacturer's Specifications and Limitations. It is the job of the SIMON crane operator to comply with all manufacturer's ratings and limitations for all crane work at any SIMON-owned or leased property and/or construction job-site.

4.2 Manufacturer's Guidelines. It is the SIMON crane operator's responsibility to ensure that the manufacturer's operating guidelines are in the cab of the crane and are accessible for use and reference.

4.3 Load Charts and Hazard Warnings. It is the SIMON crane operator's responsibility to ensure that the rated load capacities and special hazard warnings are posted on the crane and visible while at the controls.

4.4 Crane Signals. The ASME B30.5 standard hand signals for controlling mobile cranes are located in Appendix 10D. The SIMON crane operator must ensure that standard hand signals are posted and conspicuously visible on the crane. The SIMON Supervisor must ensure that standard hand signals are posted in a conspicuous place on the job site. It is the SIMON Supervisor's responsibility to ensure that each employee working with and in proximity to the crane, know and understand the crane signals, and/or radio communication signals.

4.5 Unclear Crane Signals. The SIMON crane operator is required to "stop operations" when signals are not clear and/or in the event that multiple employees are signaling. Work may only resume when this is corrected and signaling will be clear and concise.

4.6 Critical Lift Procedure. All criteria in the SIMON Critical Lift Procedure must be followed. Refer to Appendix 10A.

4.7 Crane Operator Matrix. The SIMON Safety Department will update and maintain a matrix of all SIMON crane operators with their CCO certifications. This matrix will be updated when applicable and made available at the request of a Superintendent or Area Manager.

4.8 Guarding. All reciprocating, rotating or moving parts must be guarded to prevent possible employee contact or hazard.

4.9 Anti-Two Block. All cranes must be equipped with a functional anti-two block, with the exception of pile driving operations.

4.10 Swing Radius Protection. All cranes with a rotating structure must have the swing radius area barricaded regardless of height of counterweight.

4.11 Cab Glass. All cab glass must be safety glass and free of defects.

4.12 Fire Extinguisher. At a minimum, a 10 lb. ABC multipurpose fire extinguisher must be available in all cabs or operator stations.

4.13 Modifications to Crane. No modifications which affect the capacity or safe operation shall be made to a crane, without the involvement of the manufacturer or a qualified Registered Professional Engineer.

5.0 GENERAL CRANE SAFE OPERATING PRACTICES

5.1 Subsurface and Surface Conditions. Cranes must be set-up on a firm surface and be leveled prior to operation. The work site controlling entity is required to assure that ground conditions are firm, drained properly and graded to crane manufacturer's specifications prior to assembly of equipment. The controlling entity is considered to be an owner or general contractor SIMON is working for or could be SIMON working as a general contractor. It must be sufficient to support the crane in conjunction with the blocking and or mats used. The controlling entity must notify the crane user and operator of all known underground hazards.

5.2 Outrigger Pads. Outrigger pads must be used on cranes with outriggers. The general rule of thumb for square footage is 1/5 of the capacity of the crane (e.g. - a 100-ton crane requires an outrigger pad to be at least 20 square feet - 4.5' x 4.5'). Pads that are specifically designed by the manufacturer for a crane are permitted.

5.3 Side Loading. Practices which apply a side load to the boom, such as dragging a load so that it can be lifted, are not permitted.

5.4 Hoisting in Controlled Manner. All hoisting must be performed in a smooth, controlled manner.

5.5 Suspended Loads. Employees must be kept clear of suspended loads. Operator is not permitted to leave the controls while any load is suspended.

5.6 Leaving Controls. Operators are not permitted to leave the controls while a load is suspended.

5.7 Windy Conditions. Operations in windy or adverse weather conditions are to be governed by the conditions stated in the manufacturer's manual.

5.8 Tag Lines. Tag lines will be used when determined as necessary by the SIMON Supervisor and/or SIMON crane operator and must be made of a non-conductive material (i.e. - polypropylene rope).

5.9 Safety Devices. The following safety devices are required on all equipment. Operations must not begin unless all the equipment listed is in proper working order. If a device stops working properly during operations, the operator must safely stop operations. If any of the devices listed above are not in proper working order, the equipment must be taken out of service and operations must not resume until the device is again working properly. Alternative measures are not permitted. Safety devices are as follows:

5.9.1 Crane level indicator must be built into the equipment or is available on the equipment.

5.9.2 Boom Stops—except for derricks and hydraulic booms.

5.9.3 Jib Stops (if a jib is attached)—except for derricks.

5.9.4 Equipment with foot pedal brakes must have locks.

5.9.5 Hydraulic outrigger jacks and hydraulic stabilizer jacks must have an integral holding device/check valve.

5.9.6 The equipment must have a horn that is either built into the equipment or is on the equipment and immediately available to the operator.

5.10 Fall Zone. Barricades or caution lines and notices must be erected to prevent all employees from entering the fall zone.

5.11 Out of Service. When the crane and associated equipment is taken out of service by the SIMON Crane Operator, a tag must be placed in the cab stating that the equipment is out of service and is not to be used. This is the responsibility of the SIMON Crane Operator.

5.12 Securing the Equipment in a Storm and Weather Items. When a local storm warning has been issued, the SIMON Crane Operator must determine whether it is necessary to implement manufacturer recommendations for securing the equipment. In addition, adjustments must be made to the crane to address the effects of wind, ice, and snow on equipment stability and rated capacity.

5.13 Verifying Weight of Load. The operator must verify that the load is within the rated capacity.

5.14 Obstructions. The boom or other parts of the equipment must not contact any obstruction.

5.15 Minimum of 2-Full Wraps on Drum. Neither the load nor the boom must be lowered below the point where less than two full wraps of rope remain on their respective drums.

5.16 Authority to Stop Operations. Whenever there is a concern as to safety, the SIMON crane operator has authority to stop and refuse to handle loads until a qualified person has determined that safety has been assured.

6.0 GENERAL FACTORS WHICH DECREASE CRANE CAPACITY

6.1 As boom length increases, capacity decreases.

6.2 As boom angle decreases, capacity decreases.

6.3 As load radius increases, capacity decreases.

6.4 Weights from the load line, rigging, and load block must be considered part of the load when calculating lift capacities.

6.5 The use of a jib and auxiliary hoist is governed by a separate section of the load chart, or a separate load chart. A jib is used to gain reach. The lifting capacity on a jib is often significantly less than the lifting capacity of the main boom, and is often more restricted in permissible boom angles. Consult the crane manufacturer's manual for specific information.

6.6 Certain truck and rough-terrain cranes can lift without the use of outriggers ("on-rubber"). Capacity is decreased significantly, and specific rules and restrictions apply. Consult the manufacturer's manual before attempting a lift "on-rubber".

6.7 Some cranes, due to their construction, do have full lifting capacity throughout their axis of rotation. Consult the manufacturer's manual to determine if restrictions for "over front," "over side," or "over rear" exist.

6.8 No factors increase crane capacity beyond those shown on the load charts. Follow the manufacturer's charts and instructions.

7.0 ASSEMBLY/DISASSEMBLY REQUIREMENTS

7.1 Assembly/Disassembly must be directed by the SIMON Crane Operator (A/D Director), and in cases of rental and subcontractor cranes, it must be done by their designated competent and qualified person.

7.2 The Assembly/Disassembly checklist in Appendix 10B must be filled out by the A/D Director, reviewed with all crew members involved and followed during all assembly/disassembly procedures. All manufacturer's specifications must be met during assembly and disassembly. This checklist must be satisfactorily completed prior to any assembly/disassembly activities taking place and all employees taking part in the assembly/disassembly must sign-off on the checklist.

8.0 OVERHEAD POWER LINES- CRANE SPECIFIC

8.1 Working in proximity of power lines up to 350 kV. It is the responsibility of the SIMON Supervisor and SIMON crane operator to define the crane work zone/area to determine if any part of the crane could encroach the required clearance distance of 20 feet to overhead power lines rated 350 kV or less. The following two options are available:

8.1.1 Option 1 – Erect boundary markings no closer than 20 feet to power lines, such as flags or by utilizing a range-limiting device on the crane, and prohibit the operator from operating the crane past these boundaries.

8.1.2 Option 2 – Define the work zone/area, which is 360 degrees around the crane, up to the equipment's maximum working radius.

8.2 Working Less Than 20 Feet to Power Lines Rated up to 350kV. There are 3 options to choose from when potentially working closer than 20 feet to a line rated 350kV or less.

8.2.1 Option 1— De-energize and ground. De-energization must be verified by the SIMON Supervisor.

8.2.2 Option 2 – Encroachment Prevention Measures. Must maintain 20 foot clearance by doing all of the following:

8.2.2.1 Conduct a planning meeting with the operator and the other workers who will be in the area of the equipment or load to review the location of the power lines and the steps that will be implemented to prevent encroachment/electrocution.

8.2.2.2 If tag lines are used they must be non-conductive.

8.2.2.3 Elevated warning lines, barricade or line of signs must be positioned visible to the operator at 20 feet from the power lines.

8.2.2.4 Additionally, one of these must be used: Proximity alarm, spotter, warning device, range limiter or insulating link.

8.2.3 Option 3 – The SIMON Supervisor must obtain the voltage in writing from the utility company and use **Table A (below)** to get the minimum clearances and maintain the clearances by doing all of the following:

8.2.3.1 Conduct a planning meeting with the operator and the other workers who will be in the area of the equipment or load to review the location of the power lines and the steps that will be implemented to prevent encroachment/electrocution.

8.2.3.2 If tag lines are used they must be non-conductive.

8.2.3.3 Elevated warning lines, barricade or line of signs must be positioned visible to the operator at 20 feet from the power lines.

8.2.3.4 Additionally, one of these must be used: Proximity alarm, spotter, warning device, range limiter or insulating link.

Table A- Minimum Clearance Distances

Voltage (nominal, kV, alternating current)	**Minimum clearance distance (feet)**
up to 50	10
over 50 to 200	15
over 200 to 350	20
over 350 to 500	25- Must coordinate with Safety Department for further requirements.
over 500 to 750	35- Must coordinate with Safety Department for further requirements.
over 750 to 1,000	45- Must coordinate with Safety Department for further requirements.
over 1,000	(As established by the utility owner/operator or registered professional engineer who is a qualified person with respect to electrical power transmission and distribution).

Note: The value that follows "to" is up to and includes that value. For example, over 50kV to 200kV means up to and including 200kV.

8.3 Clearance Distances in Transit.

Table B- Minimum Clearance Distanced While Traveling With No Load

Voltage (nominal, kV, alternating current)	While traveling – minimum clearance distance
up to 0.75	4
over 0.75 to 50	6
over 50 to 345	10
over 345 to 750	16- Must coordinate with Safety Department for further requirements.
over 750 to 1,000	20- Must coordinate with Safety Department for further requirements.
over 1,000	(as established by the utility owner / operator or registered professional engineer who is a qualified person with respect to electrical power transmission and distribution)

8.3.1 Dedicated Spotters While in Transit. If any part of the equipment while traveling will get closer than 20 feet to the power line, the SIMON Supervisor or SIMON Crane Operator must ensure that there is a dedicate spotter with whom he/she can maintain continuous contact. The dedicated spotter must:

8.3.1.1 Be positioned to effectively gauge the clearance distance.

8.3.1.2 Where necessary, use equipment that enables the dedicated spotter to communicate directly with the operator.

8.3.1.3 Give timely information to the operator so that the required clearance distance can be maintained.

9.0 CRANE SUSPENDED PERSONNEL PLATFORMS (MAN-BASKETS)

OSHA dictates that the use of a crane to hoist employees in a man-basket is prohibited, except when the erection, use, and dismantling of conventional means of reaching the worksite, such as a personnel hoist, ladder, stairway, aerial lift, elevating work platform or scaffold, would be more hazardous, or is not possible because of structural design or worksite conditions.

In order to use a man-basket at SIMON, the Area Manager must make a request to the Regional Manager. The Regional Manager must contact the SIMON Safety Department to discuss the feasibility identified in the preceding paragraph. Once a determination is made, only the Regional Manager can grant permission to use a man-basket. If a man-basket will be used, the Area Manager must consult with the SIMON Safety Department to obtain a copy of all the requirements of OSHA 29 CFR 1926.1431. It is then the responsibility of the Area Manager to ensure that the requirements are met.

10.0 CRANE SAFETY INSPECTIONS

Crane Safety Inspections must be completed to ensure that all critical equipment components are in a safe working condition. The following are 6 types of Crane Safety Inspections required at SIMON: (1) Modification Repair or Adjustment Inspection, (2) Post-Assembly Inspection, (3) Daily Shift Crane Safety Inspection, (4) Monthly Inspection, (5) Annual Inspection, and (6) Inspection after a Significant Event.

10.1 Modification, Repair, or Adjustment Inspection. This is a typical inspection after a maintenance modification, repair, or adjustment is made to the crane. It is the responsibility of the SIMON employee (i.e. - mechanic) or outside servicing representative to verify that the maintenance modification, repair, or adjustment was done properly upon completion.

10.1.1 If there is significant modification (that could impact the safety of the crane), repair, or adjustment that needs to be completed on the crane, then it is the responsibility of the SIMON Shop to ensure that an outside servicing representative or independent outside inspection agency who specializes in cranes be contacted to perform the work and inspect their own work for accuracy. “Significant” is to be determined by the SIMON shop.

10.2 Post-Assembly Inspection. A post-assembly inspection must be completed by the SIMON Crane Operator prior to commencing any work operations with the crane. This inspection is the same inspection as the monthly inspection. All requirements must be completed in heading 10.4 – Monthly Crane Safety Inspection, below.

10.3 Daily Shift Crane Safety Inspection. The daily crane safety inspection is inclusive of SIMON cranes and all rental cranes with a SIMON crane operator. The SIMON crane operator is required to complete this daily inspection and document it on the Daily Equipment Inspection Form. This inspection must be done pre-shift and prior to the operation of the crane. This form is obtained through the SIMON regional shop. At a minimum, the following items must be completed:

10.3.1 General mobile equipment pre-start checks.

10.3.2 Inspect and test all brakes and clutches for proper operation.

10.3.3 Inspect boom hoist kick out, boom and load drum dogs, hook block and safety latches, boom radius indicator, anti-two-block system, wire rope condition, proper guards, wire rope dead ends, fluid and air leaks, boom and jib, and all sheaves.

10.3.4 Inspect for cracked frame members, cracked or bent boom and boom lacings, and any loose bolts or missing cotter and keeper pins.

10.3.5 Insure that the current annual inspection certification, current completed monthly inspection report and monthly inspection report tablet, and load chart are in the operator's cab.

10.3.6 As part of the inspection, the SIMON crane operator must report any and all safety discrepancies of concern to the SIMON project Supervisor for corrective action in a timely manner—which is 7 days as defined by OSHA.

10.4 Monthly Crane Safety Inspection. The monthly crane safety inspection is inclusive of SIMON cranes and all rental cranes with a SIMON crane operator. The SIMON crane operator must complete a written monthly inspection of the crane using the inspection report in Appendix 10C. At a minimum, the following items must be done:

10.4.1 The SIMON Supervisor must ensure that the crane working on his job has a current written monthly inspection report completed with deficiencies corrected. **The last three monthly inspections must be retained with the crane.** The inspection reports must be made available to all people that are or will be inspecting the crane.

10.4.2 When completed, the monthly inspection report must be signed and dated by the SIMON crane operator and the most senior SIMON Supervisor on the job.

10.4.3 The monthly inspection report is set up in triplicate for the following: the original goes to the Safety Department, the yellow copy goes to the SIMON regional shop, and the blue copy remains with the crane.

10.4.4 Anytime a crane sits inactive for a period of 30 days or more, a satisfactory monthly inspection must be completed on the crane prior to commencing any work activities.

10.5 Annual Crane Safety Inspection.

10.5.1 Any crane working on any SIMON owned property and/or construction job-site must have a current valid annual inspection.

10.5.2 An annual inspection will be completed at least one time every calendar year. The last annual inspection must be retained and made available to all people who are or will be inspecting the crane.

10.5.3 The annual inspection for SIMON cranes is to be scheduled by the SIMON regional shop Supervisor. The annual inspection for rental cranes must be verified by the most senior SIMON Supervisor on the job when the crane arrives on the job, prior to booming up.

10.5.4 The annual inspection for SIMON cranes must be completed by an outside vendor (e.g. Stephenson Equipment, SEI) who specializes in crane inspection services. The inspection must meet all of the required criteria of OSHA 29 CFR 1926.1412 and ANSI B30.5.

10.5.5 For SIMON cranes and rental cranes, a copy of the annual inspection must be kept by the regional shop Supervisor, and a copy must be kept with the crane. A current safety inspection placard on the exterior of the crane is acceptable.

10.6 Inspection after a significant event. The most senior SIMON Supervisor is responsible to notify the Area Manager and SIMON Safety Department when a significant event (e.g. shock loading of a boom, crane struck by another piece

of equipment, contact with an overhead power line, etc.) occurs with a crane. A joint decision must be made as to whether an inspection of the crane is warranted. If it is, then an outside vendor (e.g. Stephenson Equipment, SEI) who specializes in crane inspection services will be brought in to conduct an inspection. If deficiencies exist, they will be repaired prior to putting the crane back in service.

11.0 SIMON CRANE OPERATOR REQUIREMENTS

11.1 CCO Certified. All SIMON crane operators are required to be CCO certified. Each operator at a minimum must be certified in one of the four specialty areas: Lattice Boom Crawler Crane (LBC), Lattice Boom Truck Crane (LBT), Small Telescopic Boom Crane (fixed cab) (TSS), Large Telescopic Boom Crane (swing cab) (TLL). For the purposes of this program, a CCO operator is a CCO certified operator.

11.1.1 Operating Outside of CCO Certification Specialty. When a SIMON CCO operator operates a crane outside of a specialty for which he is not certified, he must obtain the additional certification within 18 months.

11.1.2 Physical Requirements. The SIMON CCO operator must maintain a current DOT (Department of Transportation) Medical Examiner's Certificate (valid up to a max. of two years).

11.2 SIMON Employee Consideration to Become a Crane Operator. Prior to any SIMON employee being considered for a crane operator position, the following criteria must be met:

11.2.1 The employee must be given clearance to operate a crane from the overseeing Area Manager.

11.2.2 The employee must possess a current DOT medical examiner's card or pass a DOT physical exam.

11.2.3 Schedule permitting, the employee must attend and successfully complete a 40-hour introduction to crane operation and safety course, rigging course, and signal person course. This will occur during the winter training months and may not occur until the upcoming winter training season.

11.2.4 Once the employee has met the requirements identified above, he/she must become CCO certified within 18 months.

11.3 New Employee SIMON Crane Operators. If the employee is not already CCO certified, he/she must become so within 12 months of hire. The new-hire crane operator is also subject to the following requirements:

11.3.1 The candidate will be required to submit documentation and/or proof (e.g. CCO License) of licensing and/or crane training. The Area Manager is responsible to submit copies to the SIMON Safety Department, so the documentation can be included on the Crane Operator Matrix.

11.3.2 The candidate must be task tested by a SIMON CCO operator prior to operating any SIMON crane or rental crane.

11.3.3 The employee must possess a current DOT medical examiner's card or pass a DOT physical exam.

11.3.4 Once employed, the employee must be instructed by a SIMON CCO operator and/or SIMON Supervisor appointed by the Area Manager on the company crane program, all criteria within this program, and crane manufacturer's criteria for the crane which he is operating.

11.3.5 If not CCO certified, the employee must attend a 40-hour introduction to crane operation and safety course. This will occur during the winter training months.

11.3.6 The employee will be required to attend a rigging and signal person course. This will occur during the winter months.

11.4 CCO Maintenance. SIMON CCO operators must maintain their CCO certification status through the National Commission for the Certification of Crane Operators' re-certification process. Re-certification is every five years. Re-certification must be completed by the end of the 5^{th} year.

12.0 RIGGER QUALIFICATION

Any employee performing any type of rigging operation associated with crane work at SIMON must first successfully pass the SIMON rigging course as required in Section 30 (**SAFETY AND HEALTH TRAINING**) of this manual.

13.0 SIGNAL PERSON QUALIFICATIONS

13.1 Qualified Signal Person. Only employees who have successfully passed the SIMON Signal Person class are permitted to signal a crane, except for stops and/or emergency stops. Any SIMON employee can signal a stop or emergency stop. The SIMON signal person course requirement is identified in Section 30 (**SAFETY AND HEALTH TRAINING**) of this manual.

13.2 Documentation. SIMON must maintain documentation of testing and evaluation for all signal persons directing a crane.

13.3 When a Signal Person is Required. A signal person must be provided in each of the following situations.

13.3.1 The point of operation, meaning the load travel or the area near or at load placement, is not in full view of the operator.

13.3.2 When the equipment is traveling, the view in the direction of travel is obstructed.

13.3.3 Due to-site specific safety concerns, either the operator or the person handling the load determines that it is necessary.

13.4 Type of Signaling. Signals to operators must be by hand, voice, audible, or new signals. If radio, walkie-talkie, etc., signaling is to be used, then signaling to the SIMON crane operator must be hands free.

13.5 Emergency Stop. Every employee has the responsibility to signal emergency stop in the event that a safety hazard is recognized associated with any crane lifting operation.

14.0 RENTAL AND SUBCONTRACTOR CRANES

14.1 Prior to a subcontractor or rental crane being brought onto any SIMON owned property or construction job-site, the Safety Department must be notified.

14.2 Rental cranes with a rented operator and subcontractor cranes must comply with all requirements as outlined in this program.

14.3 Prior to using any rental or subcontractor crane it is the responsibility of the most senior SIMON Supervisor on the job to ensure that the crane has a current annual inspection in accordance with OSHA 29 CFR 1926.1412 and ANSI B30.5.

14.4 When a SIMON crane operator will be operating a rental crane, the crane operator will be responsible for all inspections as outlined in heading 10.0 of this program. When a SIMON crane operator will be operating a rental crane, the crane operator will be responsible for monitoring the expiration date on the annual inspection. Any discrepancies will be reported immediately to the crane operator's Supervisor.

14.5 CCO Operator for Critical Picks. When using a rental crane for a pick or critical lift on a project, the Area Manager must request that a CCO licensed crane operator be sent to operate the crane on the project. NOTE**:** It is important to note that a rental company may be unable to provide a CCO operator for routine hook work; however exceptions cannot be made for critical lifts.

14.6 CCO Requirements. As outlined in the critical lift procedure, subcontractor and rental crane operators must be a CCO Licensed Crane Operator in the corresponding specialty area (e.g. - Lattice Boom Crawler).

14.7 Critical Lift Procedure. Every subcontractor conducting crane operations on any SIMON owned property or job-site and meeting the criteria to mandate a critical lift as identified in Appendix 10A of this program, must comply with all aspects and specifications of the SIMON Critical Lift Procedure.

15.0 CRITICAL LIFT PROCEDURE

The Critical Lift Procedure must be followed anytime a crane pick meets the following criteria: tandem lift, net load in excess of 70,000 lbs. and crane is at or exceeds 80% of capacity, a lift in close proximity to an energized high voltage power line, lifting operations over any public transportation system (e.g. - turnpike, Amtrak/any railroad tracks, toll roads, interstates, etc.), and when the SIMON Area Manager deems it necessary. The Critical Lift Procedure must be initiated and followed by the most senior SIMON Supervisor as directed by the Area Manager. The Critical Lift Procedure is in Appendix 10A.

Subcontractors' rental cranes with operators must comply with the Critical Lift Procedure. These parties must be directed to comply with the Critical Lift Procedure by the Area Manager or the most senior SIMON Supervisor as directed by the Area Manager.

CRITICAL LIFT PROCEDURE

1.0 CRITICAL LIFT CRITERIA

1.1 Tandem lifts

1.2 Net load weight exceeds 70,000 pounds and exceeds 80% of crane's capacity.

1.3 Lifts in close proximity to high voltage power lines.

1.4 Lifting operations over public transportation systems (e.g. turnpike, Amtrak/any railroad track system, toll roads, interstates, etc.…)

1.5 When the SIMON Area Manager deems it necessary.

NOTE: Any lift should be designated as a critical lift if the load requires exceptional care in handling because of its size, weight, value, proximity to obstructions, or high susceptibility to damage. Lifts of an unusual nature should also be designated as critical.

2.0 PERSON IN CHARGE

2.1 Any lift that meets one of the listed criteria above is a critical lift, and requires completing the "Critical Lift Checklist" by the person in charge (PIC) and by project supervision. (PIC is defined as the SIMON Supervisor directly in charge of making the pick.)

2.2 For all SIMON lifts, the PIC must be a SIMON Supervisor of Foreman ranking or higher.

2.3 The PIC for subcontractor operations must be a subcontractor Supervisor who will be on-site at the time of the pick, and who is on the payroll of the subcontractor named in our contract.

3.0 CRITICAL LIFT REQUIREMENTS

3.1 Crane operators must be CCO certified.

3.2 Tandem Lifts - Never exceed 85% of each crane's rated load chart capacity.

3.3 Tandem lifts may require engineering by an independent third party. This decision will be made on a lift by lift basis.

3.4 Critical lifts should not be made in winds exceeding the manufacturer's recommendations. Winds of a speed greater than 10 miles per hour will be evaluated on a lift by lift basis.

3.5 The following two meetings are required prior to making the critical lift:

Meeting No. 1- Pre-Lift Planning Meeting

Meeting No. 2- Pre-Lift Meeting to complete the Critical Lift Checklist.

4.0 MEETING NO. 1: PRE-LIFT PLANNING MEETING

4.1 The following personnel must attend the pre-lift meeting to plan the lift: project supervision, crane rental representatives (when applicable), subcontractors, Safety Department representative, and the PIC from SIMON or the subcontractor. This meeting is required for all critical lift crane activities on all SIMON-owned or leased property and/or construction job-sites, and includes subcontractors and rental cranes.

4.2 Obtain the following information for review at the meeting:

4.2.1 Lift plan submittal with drawings. Engineering calculation for lifting beams. Type of rigging to be used and capacities.

4.2.2 Copy of the crane(s)' most recent annual inspection will be required on the date of the crane's arrival at the job. Maintenance and inspection records (most recent monthly and daily inspection).

4.2.3 Crane's make and model.

4.2.4 Crane's complete load chart for boom length, counterweight, and configuration of the planned lift.

4.2.5 Certificate of insurance for the crane.

4.2.6 Crane operator's experience and CCO License.

Review the following critical lift criteria at the meeting:

1. **Type of lift**
2. **Type and size of crane**
3. **Need for jib or lattice boom extension**
4. **Crane set-up/configuration**
5. **Rigging calculations**
6. **Staging location for load (unloading and placement locations)**
7. **Crane's capacity based on:**
    1) Total weight of the load only (excluding rigging/block/etc.)
    2) Structural or stability part of the load chart
    3) Maximum radius
    4) Boom length
    5) Number of parts of hoist line and line pull
    6) Crane's configuration
    7) Capacity and weight of the hook block
    8) Weight of rigging
    9) Type and size of cribbing or mats (general rule is outrigger pad size in square feet = crane capacity/5)
    10) Subsurface conditions (i.e. underground utilities, voids or poor soil conditions)
    11) Site conditions (i.e. power lines, tight site, traffic, etc.)
8. **Communication with the operator (i.e. designated signalman, radios are required for night, blind, and tandem picks)**
9. **Swing radius protection**
10. **Anti-two block requirements**
11. **Assign lift responsibilities (e.g. - CCO operator, signalman, rigger, etc.)**
12. **List personnel with authority to abort a lift (include all personnel signing "Critical Lift Checklist")**

5.0 MEETING NO. 2: PRE-LIFT MEETING TO COMPLETE THE CRITICAL LIFT CHECKLIST

The SIMON PIC will determine what personnel will be required to be present and mandate their attendance for the pre-lift meeting to complete the critical lift checklist. This meeting is required for all critical lift crane activities on all SIMON owned property and/or construction job-sites, and includes subcontractors and rental cranes.

However, depending on the complexity of the lift, a 2nd meeting may not be needed as long as all criteria in the Critical Lift Procedure can be completed in one meeting and planning is completed as determined by the SIMON Person-in-Charge (PIC).

6.0 CRITICAL LIFT CHECKLIST

Project:_____ **Date:**_____

Description of lift:

_____

Crane Data:

Lattice Boom or Mobile Hydraulic:_____

Crane make/model/size:_____

Counterweight:_____lbs.

Maximum Load Radius:_____ft.

Boom Length:____ft. Line Pull:_____lbs.

Load Chart Capacity @ Max. Radius___lbs.

Load Data:

Gross Load Weight:____lbs.

+ Rigging Weight:_____lbs.

+ Main Block:____lbs.

+"Effective" Jib Weight:_____lbs.

+ Cable Weight:_____lbs.

+ Overhaul Ball Weight:_lbs.

= *Total Weight of Load:* _____*lbs.*

% Capacity of Crane =_ total weight of load _____= _____% capacity

Load chart capacity @ max. Radius* NOTE: Capacity must not exceed *85% for tandem lifts.

Rigging Data:

Sling Construction: Dia. /Width in Inches ____

Core Type _____

Number of Legs: _____

Sling Angle (horizontal): _____

Sling Capacity:_____lbs.

Means of connecting (rigging) the load: ____

Capacity of connectors (rigging accessories):_____lbs.

7.0 PRE-LIFT REQUIREMENTS QUESTIONNAIRE: This pre-lift questionnaire must be completed by the SIMON Person-in-Charge. All questions must be answered yes in order to move forward with the critical lift.

YES/NO	Pre-Lift Questionnaire- All questions must be answered by Person-In-Charge
	Load chart utilized is for exact crane model, serial number, boom type, length, tip, and counterweight.
	Pre-Lift meeting with crew.
	Valid Annual Crane Inspection.
	Daily inspection completed.
	Swing path not over personnel or other construction activities.
	Footing is sound and level. (soil conditions, compaction, underground utilities)
	Planning for radio signal, hand signal, or combination of signals.
	Minimum clearances from power lines can and will be maintained.
	The load radius has been measured with a tape measure.
	Wind speed does not exceed manufacturer's recommendation.
	Load will not touch boom at any time.
	Adequate clearance for load to swing.
	Diagrams/Drawings for tandem lifts.

YES/NO	Pre-Lift Questionnaire- All questions must be answered by Person-In-Charge
	Non-essential personnel/activities are removed from critical lift area.
	Tag lines (if required) are long enough, tied only to the load, and in good condition. Employees will use tag lines to follow load, not lead load.
	Operating locations are far enough away from shoring, excavations, and trenches to eliminate risk of collapse.
	Application of hardwood mats has been carefully considered.
	Outriggers or crawler tracks will be properly extended, rubber tires will be clear of ground.
	Application of blocking under outrigger pads has carefully been considered.
	Adequate swing clearance (minimum of 2 feet) between the counterweights and any obstacles.
	Boom configuration meets manufacturer's requirements.
	Machine is rigged with proper length/type of cable and number of parts of hoist line.
	Load block is of adequate capacity, and sheaves are of proper size for hoist cable.
	All rigging has been inspected for capacity and condition.
	Underground structures and conditions have been considered.

8.0 SIGNATURES

Prior to the critical lift, signatures are required by the following individuals verifying that the Critical Lift Procedure has been completed:

Construction/Project Manager:

_____ **Date:**_____

Project Superintendent:

_____ **Date:**_____

Project Foreman:

_____**Date:**_____

CCO Operator:

_____ **Date:**_____

Person in Charge:

_____ **Date:**_____

Subcontractor - Person-in-Charge:

_____ **Date:**_____

CRANES: ASSEMBLY AND DISASSEMBLY CHECKLIST	APPENDIX 10B	
	EFFECTIVE DATE January 3, 20221	PAGE 1 of 2

A/D Director in charge:_____ CCO Crane Operator in charge: _____

Job Site Supervisor:_____ Qualified Rigger: _____

Checklist – Employee Review Project Number:_____ Date: _____

Crane Make, Capacity, and Equipment Number: _____

	ALL MANUFACTURER'S ASSEMBLY/DISASSEMBLY PROCEDURES AND INSTRUCTIONS MUST BE FOLLOWED.	**Yes/No**
1.	Does the A/D director have a printed copy of the equipment operator's manual available for review?	
2.	Does the A/D director understand all applicable assembly / disassembly procedures as described in the equipment operator's manual?	
3.	Has the crew been informed of all tasks, the hazards of the tasks, and any hazardous positions or locations to avoid during the assembly /disassembly procedure?	
4.	Can any part of the equipment get closer than 20 feet to any power line during the assembly /disassembly procedure?	
5.	If yes was answered to item 4, which option will be used during the assembly / disassembly process for protection from electrocution?	
	1. De-energize and ground?	
	2. Planning meeting, non-conductive tag lines with one of the following – dedicated spotter, proximity device, range-limiting device, elevated warning lines?	
	3. **Obtain voltage in writing from the utility company:** using Table A Minimum Clearances for distances to power lines and apply all other Option 2 requirements?	
6.	When using outriggers: Have the outriggers been fully extended as per the load charts?	
7.	Has ground stability been assessed before moving in and setting up to avoid accidents?	

8.	Has the A/D Director verified all capacities of any equipment used including rigging and lifting connectors?	
9.	Are all synthetic slings being used in accordance with the manufacturer's procedures?	
10.	Are the synthetic slings protected against abrasive, sharp, or acute edges?	
11.	After assembly, but before use: has the equipment been inspected by a qualified person?	

I UNDERSTAND THE ASSEMBLY / DISASSEMBLY INSTRUCTIONS INCLUDING ALL SAFETY PRECAUTIONS TO BE FOLLOWED:		
	Print Name:	**Signature:**
1.		
2.		
3.		
4.		
	Print Name:	**Signature:**
5.		
6.		
7.		
8.		

CRANES: INSPECTION CHECKLIST *(on next page)*	**APPENDIX 10C**	
	EFFECTIVE DATE **January 3, 20221**	**PAGE** **1 of 2**

PRE-SHIFT CRANE INSPECTION REPORT

LOCATION: _____ CAPACITY: _____

Date: _____ Unit: _____

Hours: _____ Operator: _____

1. Place a √ for items that are satisfactory. OK – Satisfactory N/A – Not Applicable RR – Repairs Required
2. All defective items shall be recorded below (Comments) and reported to the on-site Project Manager/Superintendent immediately.

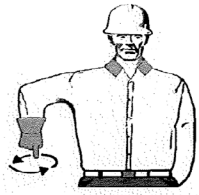
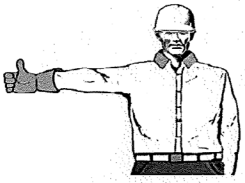
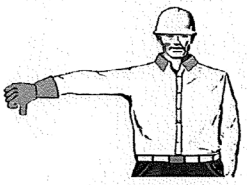
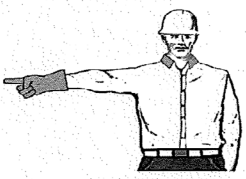
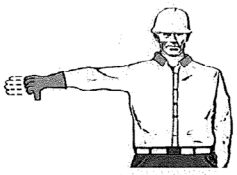
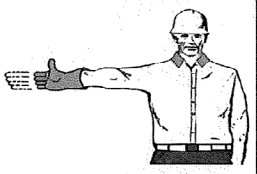
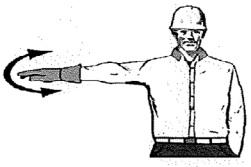
	NA	OK	RR	Comments
Coolant				
Hydraulic Oil				
Crankcase Oil				
Leaking Fluids				
Chain Case Levels				
Gear Case Levels/Winches				
Door Operation Latch-Open & Closed				
Fire Extinguisher 10 BC minimum				
Load Charts (Legible and Secured)				
Housekeeping				
Windows/Mirrors				
Owner/Operator Manual				
Hand Signal Chart (Legible)				
Safety Decals (Legible)				
Steering				
Brakes				
Park Brakes				
Boom Up/Down				
Boom In/Out				
Hoist(s) Up/Down				
Swing				
Unusual Noise				
Loss of Power				
Bad Response to Control				
Test Anti-Two Functions				
LMI for Accuracy				
Boom Length/Angle Indicator				
Back-Up Alarm				
Test Boom Kick Out Function				
Load Block/Ball /Hook(s)				
Safety Latches				
Wedge Socket(s)				
Sheaves				
Main Boom-Cords/Lattices				
Jib Extension				
Lift Cylinders				
Wire Rope – Used During Shift				
Wire Rope - Inspect Drum				
Hoist Brake				
Rope Reeving				
Dead End Secured				
Outriggers/Carriers				
Tires/inflation				
Set-up Within 1% of Level				
Swing Radius Barricaded				
Daily Lubrication				

Observations:

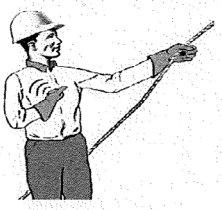
Signature _____ Date _____

CRANES: HAND SIGNALS	APPENDIX 10D	
	EFFECTIVE DATE January 3, 20221	PAGE 1 of 2

Standard Hand Signals
FOR CONTROLLING MOBILE CRANE OPERATIONS

 **HOIST** With upper arm extended to the side, forearm and index finger pointing straight up, hand and finger make small circles.	 **LOWER** With arm and index finger pointing down, hand and finger make small circles.	 **USE MAIN HOIST** A hand taps on top of the head. Then regular signal is given to indicate desired action.	 **USE WHIPLINE (Auxiliary Hoist)** With arm bent at elbow and forearm vertical, elbow is tapped with other hand. Then regular signal is used to indicate desired action.
 **BOOM UP** With arm extended horizontally to the side, thumb points up with other fingers closed.	 **BOOM DOWN** With arm extended horizontally to the side, thumb points down with other fingers closed.	 **MOVE SLOWLY** A hand is placed in front of the hand that is giving the action signal. (Hoist slowly shown in example.)	 **SWING** With arm extended horizontally, index finger points in direction that boom is to swing.
 **BOOM DOWN AND RAISE THE LOAD** With arm extended horizontally to the side and thumb pointing down, fingers open and close while load movement is desired.	 **BOOM UP AND LOWER THE LOAD** With arm extended horizontally to the side and thumb pointing up, fingers open and close while load movement is desired.	 **STOP** With arm extended horizontally to the side, palm down, arm is swung back and forth.	 **EMERGENCY STOP** With both arms extended horizontally to the side, palms down, arms are swung back and forth.

4

 **TRAVEL** With all fingers pointing up, arm is extended horizontally out and back to make a pushing motion in the direction of travel.	 **DOG EVERYTHING** Hands held together at waist level.	 **TRAVEL (BOTH TRACKS)** Rotate fists around each other in front of body; direction of rotation towards body indicates travel forward; rotation away from body indicates travel backward. (For crawler cranes only)	 **TRAVEL (ONE TRACK)** Indicate track to be locked by raising fist on that side. Rotate other fist in front of body in direction that other track is to travel. (For crawler cranes only)
 **TELESCOPE OUT (TELESCOPING BOOMS)** With hands to the front at waist level, thumbs point outward with other fingers closed.	 **TELESCOPE IN (TELESCOPING BOOMS)** With hands to the front at waist level, thumbs point at each other with other fingers closed.	 **TELESCOPE OUT (TELESCOPING BOOMS)** One hand signal. One fist in front of chest with thumb tapping chest.	 **TELESCOPE IN (TELESCOPING BOOMS)** One hand signal. One fist in front of chest, thumb pointing outward and heel of fist tapping chest.

1.0 SCOPE

This program covers all SIMON employees and subcontractors and contains safety requirements for electrical equipment and installations used to provide electric power and light at a jobsite and or plant location. These sections apply to installations, both temporary and permanent, used on the jobsite and at plants. In addition, this program encompasses requirements of 29 CFR 1926, Subpart K- Electrical.

2.0 PURPOSE

This program is to ensure compliance with all aspects of the OSHA requirements for electrical safety and to provide technical information to SIMON Supervisory personnel to protect SIMON employees exposed to dangers such as electric shock, electrocution, fires, and explosions.

3.0 DEFINITIONS

Arc Blast: Explosive release of molten material from equipment caused by high amperage arcs. This is also known as an **Arc Flash**.

Arc-Flash Circuit Interrupter: The AFCI circuitry continuously monitors current flow through the AFCI. AFCIs use unique current-sensing circuitry to discriminate between normal and unwanted arcing conditions. Once an unwanted arcing condition is detected, the control circuitry in the AFCI trips the internal contacts, thus de-energizing the circuit and reducing the potential for a fire to occur.

Arcing Faults: A series arc occurs in electrical wiring when there is a small gap or break in a conductor. A parallel arc occurs when a small gap or break which permits current to flow to ground (a ground fault) or between the hot and neutral wires (a short circuit). Arcing faults, especially parallel arcing faults, lead to overheating and a fire hazard even if no shock hazard is present.

Bonding: The permanent joining of metallic parts to form an electrically conductive path which will assure electrical continuity and the capacity to conduct safely any current likely to be imposed.

Circuit Breaker: A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined overcurrent without injury to itself when properly applied within its rating.

Class I Locations: Class I locations are those in which flammable gases or vapors are or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures.

Conductor: Bare- A conductor having no covering or electrical insulation whatsoever; or **Insulated-** A conductor encased within material of composition and thickness that is recognized as electrical insulation.

Double Insulated Tools: Portable electrical tools are classified by the number of insulation barriers between the electrical conductors in a tool and the worker. Equipment that has two insulation barriers and no exposed parts is called double insulated.

Ground: A conducting connection, whether intentional or accidental, between an electrical circuit or equipment and the earth, or to some conducting body that serves in place of the earth.

Grounded: Connected to earth or to some conducting body that serves in place of the earth.

Ground-Fault Circuit Interrupter: A device for the protection of personnel that functions to de-energize a circuit or portion thereof within an established period of time when a current to ground exceeds some predetermined value that is less than that required to operate the overcurrent protective device of the supply circuit.

Labeled: Equipment or materials with an attached label, symbol, or other identifying mark of a qualified testing laboratory which indicates compliance with appropriate standards or performance in a specified manner.

Lighting: Employees may not enter spaces containing energized parts unless adequate lighting is provided that enables the employee to work safely.

Qualified Employees: A qualified electrician employed by SIMON, an electrical contractor, or subcontractor. Some SIMON employees are not electricians but have limited exposure to live electrical parts for the purpose of voltage testing. At a minimum these employees will be trained for their specific situation in:

- The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment.
- The skills and techniques necessary to determine the nominal voltage of exposed live parts.
- The clearance distances and the corresponding voltages to which the qualified person will be exposed.

Un-Qualified Employees: This is everyone who does not meet the definition of a qualified employee.

4.0 GENERAL REQUIREMENTS

4.1 Close Proximity to Power Circuits. The SIMON Supervisor-in-charge will not permit an employee to work in such proximity to any part of an electric power circuit that they may contact in the course of their work unless the employee is protected against electric shock by de-energizing the circuit and grounding it, or by guarding it by effective insulation.

4.2 Confined Areas. When working in confined or enclosed spaces where exposure to electrical hazards exists, appropriate protective shielding, protective barriers, or insulating materials must be used.

4.3 Conductive Apparel. Conductive items of jewelry or clothing are not permitted when working where there is an electrical exposure for employees working in close proximity to energized parts.

4.4 Electrical Panels or Box Guarding. Live parts of electric equipment operating at 50 volts or more shall be guarded against accidental contact by cabinets or other forms of enclosures.

4.5 Electrical Panel or Box Enclosures. There shall be no loose or missing screws, gaskets, threaded connections, seals, or other impairments to a tight condition.

4.6 Non-Conductive Ladders. Ladders must be of a non-metal type (non-conductive wood or fiberglass) when working in proximity to overhead power lines. For example, aluminum ladders are not permitted while installing sewer lines in a city street while working directly below an overhead power line, where if raised could contact a power line.

4.7 Working on Live Parts. Employees at SIMON are not permitted to work on live parts associated with energized circuits. When working near energized lines/parts/etc., refer to Section 24 (**OVERHEAD POWER LINES**) and Section 10 (**CRANES)**, and this program of the safety manual for required safe work practice, and clearance distances. Only qualified persons are permitted to work on energized parts (i.e. - electrical contractor employees with qualified electricians).

4.8 Lock Out/Tag Out. Refer to Section 20 (**LOCK OUT/TAG OUT**), of this manual for mandatory requirements for work associated with working around energized lines, parts, and equipment. It is mandatory that any employee exposed to or potentially exposed to contacting parts of fixed electrical equipment or circuits which have been de-energized, lockout/tagout the circuits energizing the parts. Once a circuit is locked out, a qualified employee must verify that it has been successfully de energized. All electrical circuits, equipment, etc., that has been de-energized and not locked out or tagged out must be treated as "live," and proper clearance distances must be followed.

4.9 Work Space in Front of Electrical Equipment. Sufficient space shall be provided and maintained about electrical equipment to permit safe operation and maintenance of such equipment. Where parts require examination, adjustment and repair, or while live parts are exposed, adequate working space shall be provided and maintained so that this work is performed safely by a qualified electrician.

4.10 Minimum Clearance in Front of Electrical Equipment. The minimum clear working space for qualified and unqualified employees in front of electric equipment such as switchboards, control panels, switches, circuit breakers, motor controllers, relays, and similar equipment shall not be less than specified in the table below, and the space may not be used for storage.

Minimum Depth of Clear Working Space in Front of Electric Equipment

Nominal Voltage to Ground	A- below	Conditions B- below	C-below
	Feet	Feet	Feet
601 to 2,500	**3**	**4**	**5**
2,501 to 9,000	**4**	**5**	**6**
9,000 to 25,000	**5**	**6**	**9**
25,001 to 75 kV	**6**	**8**	**10**
Above 75 kV	**8**	**10**	**12**

A- Exposed live parts on one side and no live or grounded parts on the other side of the working space, or exposed live parts on both sides effectively guarded by insulating materials. Insulated wire or insulated bus bars operating at not over 300 volts are not considered live parts.

B- Exposed live parts on one side and grounded parts on the other side. Walls constructed of concrete, brick, or tiles are considered to be grounded surfaces.

C- Exposed live parts on both sides of the workspace (not guarded as provided in condition A with the operator between).

4.11 Ground-Fault Circuit Interrupters. All 120-volt, single-phase 15- and 20-ampere receptacle outlets on construction sites, which are not a part of the permanent wiring of the building or structure and which are in use by SIMON employees, must have approved ground-fault circuit interrupters for personnel protection. GFCI's must be tested as per manufacturer's recommendations prior to each use (including all generators). Completion of testing is the responsibility of the SIMON Supervisor-in-charge.

4.12 Safety Related Work Practices. Employees performing specific tasks where there is an electrical exposure or a potential for electrical exposure will be trained and educated before performing work. Where employees may face electrical exposure, prevention measures are specifically identified in this program, Section 24 (**OVERHEAD POWER LINES**), and Section 35 (**UNDERGROUND UTILITIES)**. Safe work practices will be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

5.0 ELECTRICAL TOOLS

Electrical equipment cannot be used unless the manufacturer's name, trademark, or other descriptive marking by which the organization responsible for the product may be identified is on the equipment and unless other markings are provided giving voltage, current, wattage, or other ratings as necessary.

Visually inspect all electrical equipment before use. Remove from service any equipment with frayed cords, missing ground prongs, cracked tool casings, etc. The tool or electrical equipment may not be put back into service until the proper repairs have been completed.

6.0 ELECTRICAL CORDS

6.1 Cord Condition and Inspection. Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug, except cord sets and receptacles shall be visually inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage. Equipment found damaged or defective shall not be used until properly repaired. The decision to repair a broken cord or replace it will be made by The SIMON Supervisor-in-charge.

6.2 Ground Prongs. Never use a three-pronged grounding plug with the third prong broken off.

6.3 Hanging or Suspending Cords. Extension cords shall not be fastened with staples, hung from nails, suspended by wire, or any other material that is conductive.

6.4 Sharp Corners and Damage Protection. Flexible cords and cables shall be protected from damage. Damage caused by traffic, sharp corners and projections shall be avoided.

6.5 Walkways and Aisle ways. Working spaces, walkways, and similar locations shall be kept clear of cords so as not to create a hazard to employees.

7.0 General Plant Electrical Safety

Feasible engineering and administrative controls shall be applied to mitigate or minimize the risk of injury and illness from exposure to electrical hazards. Where such hazards still exist after application of these controls, only a qualified electrician shall be permitted to conduct work in the area. local 'low voltage live work' procedures shall apply, and personal protective equipment will be utilized. Such work shall comply with NFPA 70E.

Unqualified employees shall not perform live electrical work.

- In existing installations, no changes in circuit protection shall be made to increase the load in excess of the load rating of the circuit wiring.
- Worn or frayed electric cords or cables shall be removed from work areas for repair or disposal. Plugs equipped with a grounding prong must be used. Damaged plugs must be repaired. Repairing cords shall be limited to shortening only by an authorized person.
- Working spaces, walkways, and similar locations must be kept clear of cords to eliminate hazards.
- Extension cords shall not be fastened with staples, hung from nails, or suspended by wire.
- Control equipment, utilization equipment, and busways approved for use in dry locations only shall be protected against damage from the weather during building construction.
- Metal raceways, cable armor, boxes, cable sheathing, cabinets, elbows, couplings, fittings, supports, and support hardware shall be of materials appropriate for the environment in which they are to be installed.
- Electrical switches shall be labeled to indicate the system, equipment, service, or tool they control. This includes switch boxes, cabinets, motor control cabinets, stationary equipment, control panels, and other such switches or disconnects.
- In work areas where the exact location of underground electric power lines is unknown, employees using jackhammers, bars, or other hand tools that may contact a line shall be provided with insulated protective gloves. Gloves must be rated to (or exceed) the voltage for which they may be exposed. The gloves shall be inspected before use and replaced as per the manufacturer's specifications.
- Wiring components and equipment in hazardous environments shall be maintained in a condition consistent with NEC requirements (i.e. no loose or missing screws, gaskets, threaded connections, seals, or other impairments to a tight condition).
- Hazardous locations are those locations where flammable vapors, liquids or gases, or combustible dusts or fibers may be present. There are six "classifications" for these types of locations, as follows:

  - **Class I Division 1 and Division 2**
  - **Class II Division 1 and Division 2**
  - **Class III Division 1 and Division 2**

Equipment, wiring methods, and installations of electrical equipment in hazardous (classified) locations must be designated as "intrinsically safe" or be approved for the classification location.

7.1 Energized Electrical Parts and Systems

This section does not apply to power distribution or transmission lines. Refer to CFR Subpart "R" 1910.269 (servicing) and/or CFR Subpart "V" 1926.950 (construction) for overhead power transmission and distribution line requirements.

- Safety-related work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits which are or may be energized. The specific safety-related work practices shall be consistent with the nature and extent of the associated electrical hazards.

- Live parts to which an employee may be exposed shall be deenergized before the employee works on or near them, unless it can be demonstrated that deenergizing introduces additional or increased hazards or is infeasible due to equipment design or operational limitations. Live parts that operate at less than 50 volts to ground need not be deenergized if there will be no increased exposure to electrical burns or to explosion due to electric arcs.
- If the exposed live parts are not deenergized (i.e., for reasons of increased or additional hazards or infeasibility), other safety-related work practices shall be used to protect employees who may be exposed to the electrical hazards involved. Such work practices shall protect employees against contact with energized circuit parts directly with any part of their body or indirectly through some other conductive object.

7.2 Working on or near exposed deenergized parts

This section applies to work on exposed deenergized parts near enough to expose employee/s to an electrical hazard.

- While an employee is exposed to contact with fixed electrical equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out in accordance with the Energy Control (lockout) section (XX) of this manual.
- The circuits and equipment to be worked on shall be disconnected from electrical energy sources (and locked out). Control circuit devices, such as push buttons, selector switches, and interlocks, shall not be used as the sole means for deenergizing circuits or equipment.
- Stored non-electrical energy in devices that could reenergize electrical parts shall be blocked or relieved to the extent that the parts could not be accidentally energized by the device.

7.3 Working on or near exposed energized parts

Every effort shall be made to preclude work on energized electrical parts. When this is not possible, the requirements of this section shall apply. Potential contact with live energized parts includes work performed on exposed live parts (involving either direct contact or contact by means of tools or materials) or near enough to them for employees to be exposed to any hazard they present.

Only qualified persons shall work on electrical equipment that has not been deenergized.

If work is to be performed near overhead lines, the lines shall be deenergized and grounded, or other protective measures shall be provided before work is started.

If the lines are to be deenergized, arrangements shall be made with the person or organization that operates or controls the electric circuits involved to deenergize and ground them. If protective measures, such as guarding, isolating, or insulating are provided, these precautions shall prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools, or equipment.

7.4 Qualified electrical worker training

Employees deemed as qualified electrical workers by the company will be sent through an Arc Flash and High Voltage training course. The course will either be online or set up through the Safety Manager of that region.

1.0 SCOPE

This program covers guidelines for the protection of employees working in and around excavations and trenches. Additionally, this program encompasses the requirements of OSHA Subpart P- Excavations.

2.0 PURPOSE

The purpose of the excavation and trenching program is to provide technical information for SIMON Supervisory personnel to do the following: to meet the OSHA general requirements, to meet the protective system requirements, to be able to determine the classification of soil, to follow the benching and sloping requirements, and to know and understand the requirements of a Registered Professional Engineer.

3.0 DEFINITIONS

Competent Person: A competent person is the on-site SIMON Supervisor conducting the excavation work who through training and/or experience is knowledgeable about soil classification, the use of protective systems (sloping, benching, and ground support systems), the general requirements of the standard, and the requirements of a Registered Professional Engineer.

This SIMON Supervisor will also be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees, and this SIMON Supervisor does have the authority to take prompt corrective action to ensure the work pertaining to excavations is safe.

Excavation: An excavation is any man-made cut, cavity, trench, or depression in the earth's surface formed by the removal of earth.

Registered Professional Engineer: A person who is registered as a professional engineer in the state where the work is to be performed. However, a professional engineer registered in any state is considered a "Registered Professional Engineer" with regard to approving designs for "manufactured protective systems" (e.g.- sheeting/shoring systems), or "tabulated data" for trench boxes.

Sheeting/Shoring/Protective Systems: Some examples of sheeting and shoring systems are: H-piles and lagging boards, sheet piling, mesh/concrete with tie-backs, slurry wall, etc. All sheeting and shoring systems built and put in place at SIMON must be designed and approved by a Registered Professional Engineer.

Tabulated Data: These are the tables and charts supplied by the manufacturers of trench boxes and approved by a registered professional engineer. They are also used to design and construct a protective system.

Trench: In general, a trench's depth is greater than the width, but the width of a trench (measured at the bottom) is not greater than 15 feet. All trenches are also excavations.

Trench Box: A trench box is a structure that is able to withstand forces imposed on it by a cave-in, protecting the employees within the structure. This is the most common form of protective system at SIMON.

4.0 GENERAL REQUIREMENTS

4.1 Training Requirements. All SIMON Supervisors performing excavation work are required to complete the 8-hour Excavation and Trenching Competent Person Safety Course. All other employees will receive excavation and trenching training through weekly tool-box talks and by daily instruction from their on-site Supervisor. In addition, designated employees will be selected by their Area Manager to complete the 8-hour Excavation and Trenching Competent Person Safety Course.

4.2 Inspections by SIMON Supervisor. The Supervisor must conduct daily inspections of their excavation operations, the adjacent areas, and of the protective systems in use. The inspection must be conducted on an open excavation prior to the start of work and as needed throughout the shift. The Supervisor must inspect after every rainstorm or

other hazard-increasing occurrences. At a minimum, the SIMON Supervisor must conduct a written daily inspection of the excavation on the daily excavation safety checklist log.

4.3 Surface Encumbrances. All obstacles that are hazardous to employees shall be removed or supported. The following are some examples of surface encumbrances: sign structures and telephone poles or trees with the potential to fall over once excavating begins.

4.4 Underground Utilities. Before excavating commences all requirements of Section 35 **(UNDERGROUND UTILITIES)** of this manual must be met.

4.5 Access and Egress. All excavations > 4 feet in depth must have a stairway, ladder, ramp or other safe means of access/egress. This must be located within 25 feet of lateral travel distance to an employee.

4.6 Exposure to Falling Loads, Loose Rock, or Soil. No SIMON employee working in an excavation is permitted underneath a suspended load handled by lifting or digging equipment.

4.6.1 Materials that can roll or fall onto an employee must be chalked, positioned, or secured in a way that it will not roll or fall onto an employee. Examples of this material are reinforced concrete pipe (RCP), or ductile iron pipe (DIP).

4.6.2 Equipment and spoils piles must be kept a minimum of two feet from the edge of an excavation. Adequate protection must be taken to protect SIMON employees from falling rock or soil.

4.7 Mobile Equipment in Proximity to an Excavation. The SIMON Supervisor must ensure that the operator(s) of mobile equipment operating in the vicinity of an excavation knows where the work is taking place, and that effective communication (e.g. - radio, hand signals, designated signaler, etc.) is in place to prevent the mobile equipment from going into an excavation. In addition, the sides of excavations must be shored or braced sufficiently to withstand additional stresses caused by weight or vibration of mobile construction equipment and construction vehicles.

4.8 Berms on Haul Roads next to Excavations. When deemed necessary by the SIMON Supervisor or SIMON Safety Department, berms must be put in place. Berms must be 1/2 the height of the highest axle on-site that is traveling this route.

4.9 Hazardous Atmospheres. When hazardous atmospheres are suspected, the requirements of Section 9 (**CONFINED SPACES**) of this manual must be met.

4.10 Water Accumulation. Employees are not permitted to work in excavations where there is accumulated water, or in excavations in which water is accumulating, unless adequate precautions have been taken and are being monitored by the SIMON Supervisor. Excavations subjected to rainfall must be inspected immediately after the rainfall, daily, and as determined necessary by the SIMON Supervisor.

4.11 Stability of Adjacent Structures. Where the stability of adjoining or adjacent structures (e.g. - buildings, walls, footings, etc.) is endangered by excavation operations, support systems such as shoring, bracing, or underpinning may be required. A registered professional engineer may also be required for design approval as determined by the project owner and/or the SIMON Area Manager.

4.12 Fall Protection. Where employees or equipment are required or permitted to cross over excavations, walkways or bridges, standard guardrails must be used as required by the SIMON Fall Protection Program, Section 13 (**FALL PROTECTION**) of this manual. Physical barriers (e.g. - road plates) must be placed over all wells, pits, similar holes, etc.

5.0 PROTECTIVE SYSTEMS

An excavation protective system is a method of protecting employees from cave-ins of material that could fall or roll from an excavation face and into an excavation, or a method to protect from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide the necessary protection, such as trench boxes. Protective systems must be able to resist all loads that are, or could possibly be exerted on the system.

Protective systems are not required in the following situations as determined by the SIMON Supervisor: (1) Excavations less than 5 feet in depth where the SIMON Supervisor's examination of the ground indicates no danger of a potential cave-in, and (2) when excavations are made entirely in stable rock at depths < 20 feet.

6.0 SLOPING/BENCHING

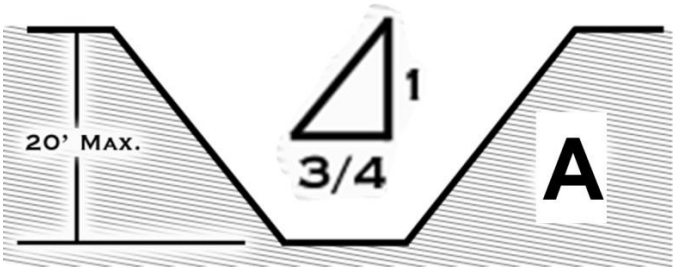
6.1 Sloping and Benching - 5 Feet to 20 Feet in Depth. The configurations of sloping and benching systems for excavations 5 to 20 feet in depth will be selected and constructed by the SIMON Supervisor and will be in accordance with the diagrams in the next section.

Prior to determining the proper benching or sloping system, soils analysis and classification must be performed as outlined in Appendix 12A of this program, by the SIMON Supervisor. This must consist of at least one visual and at least one manual test. If the SIMON Supervisor does not perform a soils analysis and classification when sloping and benching is to be used, then the assumption must be made that the soil type is C; therefore, Type C Soil requirements in this program must be followed.

6.2 Sloping and Benching Requirements. The sloping and benching system requirements are taken directly from OSHA Subpart P and are as follows (all slopes stated below are in the horizontal to vertical ratio):

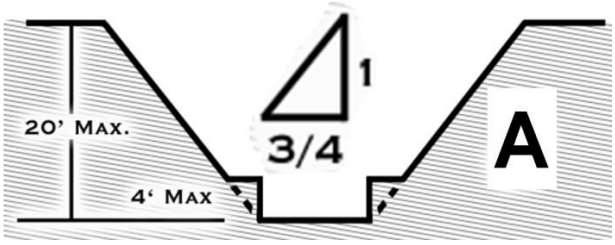
6.2.1 Excavations made in Type A soil

All simple slope excavations 20 feet or less in depth shall have a maximum allowable slope of 3/4:1.

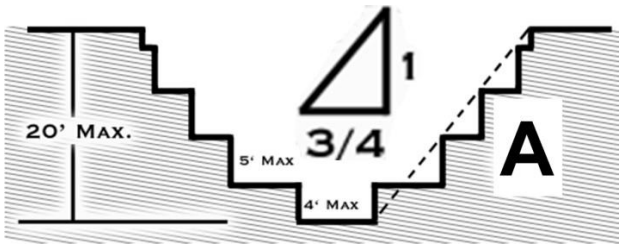


SIMPLE SLOPE -- GENERAL

All benched excavations 20 feet or less in depth shall have a maximum allowable slope of 3/4:1 and maximum bench dimensions as follows:

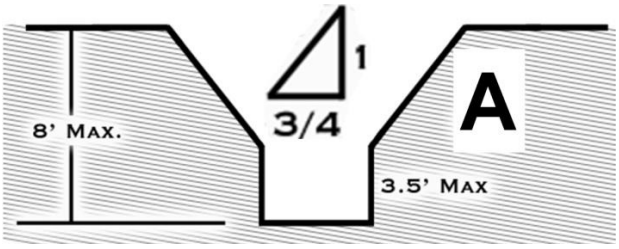


SIMPLE BENCH



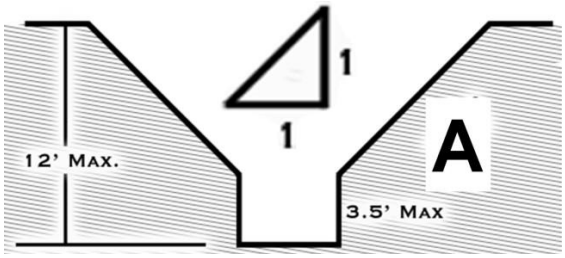
MULTIPLE BENCHES

All excavations 8 feet or less in depth which have unsupported vertically-sided lower portions shall have a maximum vertical side of 3½ feet.



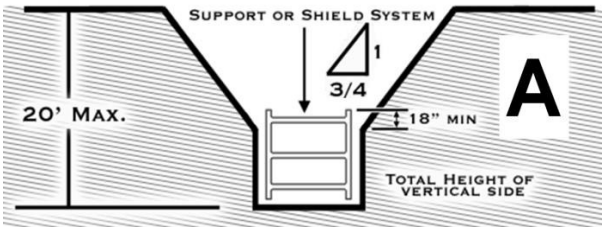
UNSUPPORTED VERTICALLY-SIDED LOWER PORTION – (MAXIMUM 8 FEET IN DEPTH)

All excavations more than 8 feet but not more than 12 feet in depth with unsupported vertically-sided lower portions shall have a maximum allowable slope of 1:1 and a maximum vertical side of 3½ feet.



UNSUPPORTED VERTICALLY-SIDED LOWER PORTION – (MAXIMUM 12 FEET IN DEPTH)

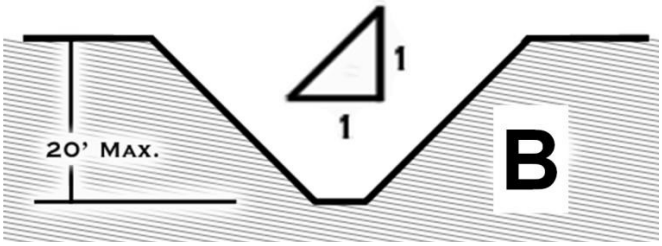
All excavations 20 feet or less in depth which have vertically-sided lower portions that are supported or shielded shall have a maximum allowable slope of 3/4:1. The support or shield system must extend at least 18 inches above the top of the vertical side.



SUPPORTED OR SHIELDED VERTICALLY-SIDED LOWER PORTION

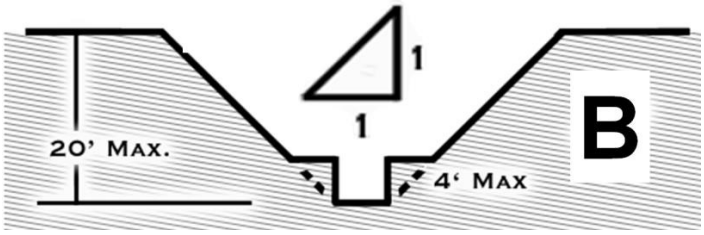
6.2.2 Excavations Made in Type B Soil

All simple slope excavations 20 feet or less in depth shall have a maximum allowable slope of 1:1.

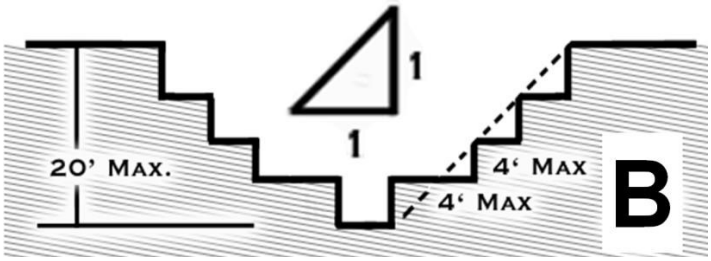


SIMPLE SLOPE

All benched excavations 20 feet or less in depth shall have a maximum allowable slope of 1:1 and maximum bench dimensions as follows:

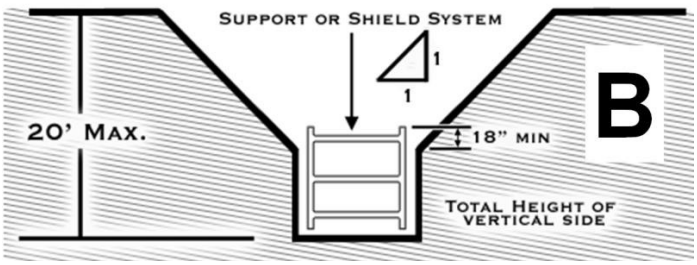


SINGLE BENCH



MULTIPLE BENCHES

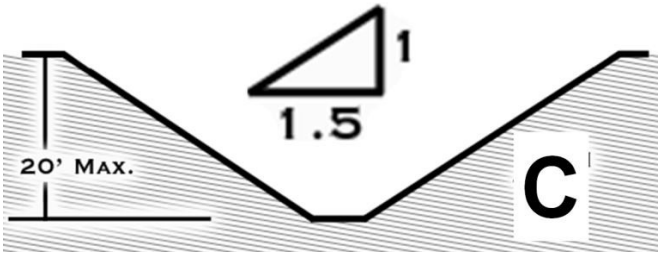
All excavations 20 feet or less in depth which have vertically-sided lower portions shall be shielded or supported to a height at least 18 inches above the top of the vertical side. All such excavations shall have a maximum allowable slope of 1:1.



VERTICALLY-SIDED LOWER PORTION

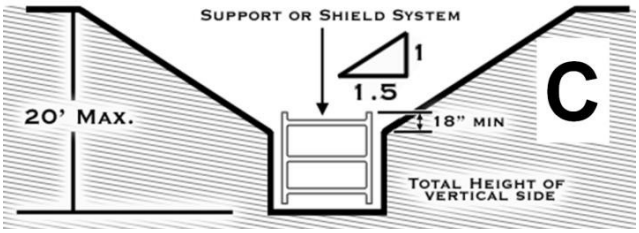
6.2.3 Excavations Made in Type C Soil

All simple slope excavations 20 feet or less in depth shall have a maximum allowable slope of 1½:1.



SIMPLE SLOPE

All excavations 20 feet or less in depth which have vertically-sided lower portions shall be shielded or supported to a height at least 18 inches above the top of the vertical side. All such excavations shall have a maximum allowable slope of 1½:1.



VERTICAL SIDED LOWER PORTION

6.2.4 Sloping and Benching – Greater than 20 Feet in Depth. It must be designed by a registered professional engineer. This information must be documented and stamped, and a copy maintained on the job-site.

7.0 SUPPORT SYSTEMS, SHIELD SYSTEMS, OR OTHER PROTECTIVE SYSTEMS

Designs of excavation support systems, shield systems, and other protective systems must be selected by the SIMON Supervisor-in-charge of the project (e.g.- Area Manager, Construction Manager, Project Manager, or Superintendent) and constructed by the SIMON job-site Supervisor (e.g.- Superintendent or Foreman) and must be in accordance with one of the following three options below. The two most commonly followed options at SIMON are Option 2, which includes trench boxes, and Option 3, which is a protective system designed by a registered professional engineer.

7.1 Option 1(Timber and Hydraulic Shoring). Designs using Appendices A (and Appendix 12A of this program), C, and D of the OSHA 1926 Subpart P Excavation Standards which are Soil Classification, Timber Shoring for Trenches, and Designs for Hydraulic Shoring. If timber or hydraulic shores are going to be used, contact the SIMON Safety Department for copies of Appendices C and D.

7.2 Option 2 (Trench Boxes, Slide Rail Systems, Build-a-Box, etc.). Designs using manufacturer's tabulated data. Designs of support systems, shield systems, or other protective systems that are taken from manufacturer's tabulated data must be in accordance with all specifications, recommendations, and limitations issued or made by the manufacturer. Deviations cannot be made unless written approval is obtained from the manufacturer. All tabulated data must be kept on site by the SIMON Supervisor.

7.3 Option 3 (Design by a Registered Professional Engineer and All Systems for Excavations Greater Than 20 Feet in Depth). Support systems not utilizing Options 1 or 2 must be approved and stamped by a Registered Professional Engineer. In addition, all excavations greater than 20 feet in depth must be approved and stamped by a Registered Professional Engineer. A copy of the stamped written plan must be kept on site by the SIMON Supervisor.

8.0 GENERAL TRENCH BOX REQUIREMENTS

8.1 The Area Manager or designee must submit tabulated data to the Safety Department when a new trench box is purchased.

8.2 The Area Manager or designee must notify the SIMON Safety Department when a trench box becomes unusable or is discarded so that the tabulated data can be taken out of the trench box booklet.

8.3 Maintenance and repairs to trench boxes must be in accordance with manufacturer's specifications.

8.4 Trench boxes must be secured in the excavation to prevent lateral or other hazardous movement. The general rule of thumb is to backfill ½ the height of the trench box.

8.5 Employees are not permitted in trench boxes when they are being installed, removed, or moved vertically.

8.6 The bottom of the trench box must be within 2 feet of the bottom of the excavation as long as the trench box is designed for the full depth of the excavation.

8.7 When trench boxes are used on road projects, the top of the box can be flush with the road as long as there is no material with a potential to fall onto an employee.

8.7.1 When trench boxes are used on dirt projects, the top of the box must be sticking out of the ground 18" to prevent material from falling onto an employee.

8.7.2 All proper spreader pins and keeper pins must be in place at all times while the trench box is in use.

8.7.3 Trench boxes must be pinned or adequately secured together as determined by the SIMON Supervisor for stacking operations.

8.7.4 The SIMON tabulated data booklet must be kept on file with all SIMON Supervisors using trench boxes.

9.0 BARRICADING EXCAVATIONS

The SIMON Supervisor is required to properly barricade any open excavation where the potential for public interface may take place and the potential for a pedestrian to be injured is possible. Backfilling, chain-link fence, use of road plates, and orange snow fence are all acceptable ways to protect an open excavation. It is imperative for the SIMON Supervisor to review contract-specific pedestrian protection requirements, because a contract may spell out specific means and methods for pedestrian protection.

1.0 SCOPE

This Appendix describes a method of classifying soil and rock deposits based on site and environmental conditions, and on the structure and composition of the earth deposits. The Appendix contains definitions, sets forth requirements, and describes acceptable visual and manual tests for use in classifying soils.

2.0 APPLICATION

This Appendix applies when a sloping or benching system is designed in accordance with the requirements set forth in 1926.652(b) (2) as a method of protecting employees from cave-ins. This Appendix also applies when timber shoring for excavations is designed as a method of protection from cave-ins in accordance with Appendix C to subpart P of part 1926, and when aluminum hydraulic shoring is designed in accordance with Appendix D. This Appendix also applies if other protective systems are designed and selected for use from data prepared in accordance with the requirements set forth in 1926.652(c), and the use of the data is predicated on the use of the soil classification system set forth in this Appendix.

3.0 DEFINITIONS

The definitions and examples given below are based on, in whole or in part, the following; American Society for Testing Materials (ASTM) Standards D653-85 and D2488; The Unified Soils Classification System; The U.S. Department of Agriculture (USDA) Textural Classification Scheme; and The National Bureau of Standards Report BSS-121.

Cemented soil: A soil in which the particles are held together by a chemical agent, such as calcium carbonate, such that a hand-sized sample cannot be crushed into powder or individual soil particles by finger pressure.

Cohesive soil: Clay (fine grained soil), or soil with a high clay content, which has cohesive strength. Cohesive soil does not crumble, can be excavated with vertical side slopes, and is plastic when moist. Cohesive soil is hard to break up when dry, and exhibits significant cohesion when submerged. Cohesive soils include clay silt, sandy clay, silty clay, clay and organic clay.

Dry soil: Soil that does not exhibit visible signs of moisture content. **"Fissured"** means a soil material that has a tendency to break along definite planes of fracture with little resistance, or a material that exhibits open cracks, such as tension cracks, in an exposed surface.

Granular soil: Gravel, sand, or silt (coarse grained soil) with little or no clay content. Granular soil has no cohesive strength. Some moist granular soils exhibit apparent cohesion. Granular soil cannot be molded when moist and crumbles easily when dry.

Layered system: Two or more distinctly different soil or rock types arranged in layers. Micaceous seams or weakened planes in rock or shale are considered layered.

Moist soil: A condition in which a soil looks and feels damp. Moist cohesive soil can easily be shaped into a ball and rolled into small diameter threads before crumbling. Moist granular soil that contains some cohesive material will exhibit signs of cohesion between particles.

Plastic: A property of a soil which allows the soil to be deformed or molded without cracking, or appreciable volume change.

Saturated soil: A soil in which the voids are filled with water. Saturation does not require flow. Saturation, or near saturation, is necessary for the proper use of instruments such as a pocket penetrometer or sheer vane.

Soil classification system: For the purpose of this subpart, a method of categorizing soil and rock deposits in a hierarchy of Stable Rock, Type A, Type B, and Type C, in decreasing order of stability. The categories are determined based on an analysis of the properties and performance characteristics of the deposits and the characteristics of the deposits and the environmental conditions of exposure.

Stable rock: Natural solid mineral matter that can be excavated with vertical sides and remain intact while exposed. **Submerged soil:** Soil which is underwater or is free seeping.

Type A: Cohesive soils with an unconfined, compressive strength of 1.5 ton per square foot (tsf) (144 kPa) or greater. Examples of cohesive soils are: clay, silty clay, sandy clay, clay loam and, in some cases, silty clay loam and sandy clay loam. Cemented soils such as caliche and hardpan are also considered Type A. However, **no soil is Type A if**:

- The soil is fissured; or
- The soil is subject to vibration from heavy traffic, pile driving, or similar effects; or
- The soil has been previously disturbed; or
- The soil is part of a sloped, layered system where the layers dip into the excavation on a slope of four horizontal to one vertical (4H:1V) or greater; or
- The material is subject to other factors that would require it to be classified as a less stable material.

Type B: Cohesive soil with an unconfined compressive strength greater than 0.5 tsf (48 kPa) but less than 1.5 tsf (144 kPa); or

- Granular cohesion-less soils including: angular gravel (similar to crushed rock), silt, silt loam, sandy loam and, in some cases, silty clay loam and sandy clay loam.
- Previously disturbed soils except those which would otherwise be classed as Type C soil.
- Soil that meets the unconfined compressive strength or cementation requirements for Type A, but is fissured or subject to vibration; or
- Dry rock that is not stable; or
- Material that is part of a sloped, layered system where the layers dip into the excavation on a slope less steep than four horizontal to one vertical (4H:1V), but only if the material would otherwise be classified as Type B.

Type C: Cohesive soil with an unconfined compressive strength of 0.5 tsf (48 kPa) or less; or

- Granular soils including gravel, sand, and loamy sand; or
- Submerged soil or soil from which water is freely seeping; or
- Submerged rock that is not stable, or
- Material in a sloped, layered system where the layers dip into the excavation or a slope of four horizontal to one vertical (4H:1V) or steeper.

Unconfined compressive strength: The load per unit area at which a soil will fail in compression. It can be determined by laboratory testing, or estimated in the field using a pocket penetrometer, by thumb penetration tests, and other methods.

Wet soil: Soil that contains significantly more moisture than moist soil, but in such a range of values that cohesive material will slump or begin to flow when vibrated. Granular material that would exhibit cohesive properties when moist will lose those cohesive properties when wet.

4.0 CLASSIFICATION

Classification of soil and rock deposits. Each soil and rock deposit shall be classified by a competent person as Stable Rock, Type A, Type B, or Type C in accordance with the definitions set forth in heading 3.0 of this Appendix.

4.1 Basis of classification. The classification of the deposits shall be made based on the results of at least one visual and at least one manual analysis. Such analyses shall be conducted by a competent person using tests described in heading 5.0 below, or in other recognized methods of soil classification and testing such as those adopted by the American Society for Testing Materials, or the U.S. Department of Agriculture textural classification system.

4.2 Visual and manual analyses. The visual and manual analyses, such as those noted as being acceptable in heading 5.0 of this Appendix, shall be designed and conducted to provide sufficient quantitative and qualitative information as may be necessary to identify properly the properties, factors, and conditions affecting the classification of the deposits.

4.3 Layered systems. In a layered system, the system shall be classified in accordance with its weakest layer. However, each layer may be classified individually where a more stable layer lies under a less stable layer.

4.4 Reclassification. If, after classifying a deposit, the properties, factors, or conditions affecting its classification change in any way, the changes shall be evaluated by a competent person. The deposit shall be reclassified as necessary to reflect the changed circumstances.

5.0 ACCEPTABLE VISUAL AND MANUAL TESTS.

5.1 Visual tests. Visual analysis is conducted to determine qualitative information regarding the excavation site in general, the soil adjacent to the excavation, the soil forming the sides of the open excavation, and the soil taken as samples from excavated material.

5.1.1 Observe samples of soil that are excavated and soil in the sides of the excavation. Estimate the range of particle sizes and the relative amounts of the particle sizes. Soil that is primarily composed of fine-grained material is cohesive material. Soil composed primarily of coarse-grained sand or gravel is granular material.

5.1.2 Observe soil as it is excavated. Soil that remains in clumps when excavated is cohesive. Soil that breaks up easily and does not stay in clumps is granular.

5.1.3 Observe the side of the opened excavation and the surface area adjacent to the excavation. Crack-like openings such as tension cracks could indicate fissured material. If chunks of soil spall off a vertical side, the soil could be fissured. Small spalls are evidence of moving ground and are indications of potentially hazardous situations.

5.1.4 Observe the area adjacent to the excavation and the excavation itself for evidence of existing utility and other underground structures, and to identify previously disturbed soil.

5.1.5 Observe the opened side of the excavation to identify layered systems. Examine layered systems to identify if the layers slope toward the excavation. Estimate the degree of slope of the layers.

5.1.6 Observe the area adjacent to the excavation and the sides of the opened excavation for evidence of surface water, water seeping from the sides of the excavation, or the location of the level of the water table.

5.1.7 Observe the area adjacent to the excavation and the area within the excavation for sources of vibration that may affect the stability of the excavation face.

5.2 Manual tests. Manual analysis of soil samples is conducted to determine quantitative as well as qualitative properties of soil and to provide more information in order to classify soil properly.

5.2.1 Plasticity. Mold a moist or wet sample of soil into a ball and attempt to roll it into threads as thin as 1/8-inch in diameter. Cohesive material can be successfully rolled into threads without crumbling. For example, if at least a two inch (50 mm) length of 1/8-inch thread can be held on one end without tearing, the soil is cohesive.

5.2.2 Dry strength. If the soil is dry and crumbles on its own or with moderate pressure into individual grains or fine powder, it is granular (any combination of gravel, sand, or silt). If the soil is dry and falls into clumps which break up into smaller clumps, but the smaller clumps can only be broken up with difficulty, it may be clay in any combination with gravel, sand or silt. If the dry soil breaks into clumps which do not break up into small clumps and which can only be broken with difficulty, and there is no visual indication the soil is fissured, the soil may be considered un-fissured.

5.2.3 Thumb penetration. The thumb penetration test can be used to estimate the unconfined compressive strength of cohesive soils. (This test is based on the thumb penetration test described in American Society for Testing and Materials (ASTM) Standard Designation D2488 - "Standard Recommended Practice for Description of Soils (Visual - Manual Procedure).") Type A soils with an unconfined compressive strength of 1.5 tsf can be readily indented by the thumb; however, they can be penetrated by the thumb only with very great effort. Type C soils with an unconfined compressive strength of 0.5 tsf can be easily penetrated several inches by the thumb, and can be molded by light finger pressure. This test should be conducted on an undisturbed soil sample, such as a large clump of soil, as soon as practical after excavation to keep to a minimum the effects of exposure to drying influences. If the excavation is later exposed to wetting influences (rain, flooding), the classification of the soil must be changed accordingly.

5.2.4 Other strength tests. Estimates of unconfined compressive strength of soils can also be obtained by use of a pocket penetrometer or by using a hand-operated shear vane.

5.2.5 Drying test. The basic purpose of the drying test is to differentiate between cohesive material with fissures, un-fissured cohesive material, and granular material. The procedure for the drying test involves drying a

sample of soil that is approximately one inch thick (2.54 cm) and six inches (15.24 cm) in diameter until it is thoroughly dry:

5.2.5.1 If the sample develops cracks as it dries, significant fissures are indicated.

5.2.5.2 Samples that dry without cracking are to be broken by hand. If considerable force is necessary to break a sample, the soil has significant cohesive material content. The soil can be classified as an un-fissured cohesive material and the unconfined compressive strength should be determined.

5.2.5.3 If a sample breaks easily by hand, it is either a fissured cohesive material or a granular material. To distinguish between the two, pulverize the dried clumps of the sample by hand or by stepping on them. If the clumps do not pulverize easily, the material is cohesive with fissures. If they pulverize easily into very small fragments, the material is granular.

1.0 SCOPE

This program sets the minimum guidelines for the protection of employees working at elevations 6 feet or more on any SIMON construction operation and 4 feet or more at SIMON shops, emulsion plant, and hot mix asphalt plants. Additionally, this program encompasses the requirements of OSHA 29 CFR 1926, Subpart M- Fall Protection.

2.0 PURPOSE

The purpose of the fall protection program is to provide technical information for SIMON Supervisory personnel to do the following: meet the OSHA general fall protection requirements, meet the fall protection system criteria and minimum requirements, meet the training requirements as outlined in the fall protection standard, and know what approved personal fall arrest system equipment is to be purchased as approved by the SIMON Safety Department.

3.0 DEFINITIONS

Anchorage: A secure point of attachment for lifelines, lanyards, or deceleration devices. Anchorage points must be capable of supporting a minimum force of 5,000 lbs. or a force two times the intended maximum load that an employee and personal fall arrest system will generate on it when an employee falls.

Approved: Any component of a personal fall arrest system that is approved by the SIMON Safety Department for purchase through a safety equipment vendor for use by SIMON Supervisory personnel and their employees. Non-approved personal fall arrest system components may not be used. **Approved** also means approval given by the SIMON Safety Department.

Body Harness: A harness approved by the SIMON Safety Department.

Competent Person: The on-site SIMON Supervisor conducting the work operations where a fall protection system is required. This Supervisor, through experience and training, will be knowledgeable in the general fall protection requirements, guardrail systems, horizontal lifeline systems for bridge beams, personal fall arrest systems, positioning devices, hole covers, protection from falling objects, training requirements, or other applicable requirements as set forth in OSHA 29 CFR Subpart P- Fall Protection.

This SIMON Supervisor will also be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees; this SIMON Supervisor does have the authority to take prompt corrective action to ensure the work pertaining to fall protection is safe.

Connector: A device which is used to connect parts of the personal fall arrest system together. For example, a D-ring on a harness, a carabineer, or a snap hook on a lanyard.

Deceleration Device: An approved lanyard or lifeline, which serves to dissipate a substantial amount of energy during a fall, or otherwise limit forces put on an employee's body during a fall.

Free Fall: Falling before your personal fall arrest system engages.

Guardrail System: A barrier (top rail, midrail, toeboards, and intermediate vertical posts) erected to prevent employees or materials from falling to lower levels.

Horizontal Lifeline System (HLS) for Bridge Beams: A system consisting of a flexible line and vertical stanchions for connection to an anchorage at both ends, stretches, and serves as a connecting point for an employee's personal fall arrest system. This system must meet all of the requirements set forth in OSHA 29 CFR 1926, Subpart P - Fall protection, and be designed and stamped by a Registered Professional Engineer.

Hole: A gap or void two inches in its least dimension, in a floor, or other walking/working surface.

SIMON Supervisor: The Supervisor directly in charge of the work operations.

Lanyard: An approved flexible line of rope, wire rope, or strap which generally has a connector at each end for connecting the Body Harness to an anchorage.

Lifeline: An approved component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline) or for connection to anchorages to stretch horizontally (horizontal lifeline), which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

One-Hundred Percent (100%) Fall Protection: 100% means at no time when exposed is an employee permitted to be unprotected. For example, an employee tied-off will use a harness with two lanyards. At least one of the lanyards will be hooked off at all times, and at no time is an employee permitted to unhook a lanyard without first hooking up the other lanyard.

Personal Fall Arrest System: An approved system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body harness, and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

Positioning Device: A body harness system rigged to allow an employee to be supported on an elevated vertical surface (e.g. - concrete forms) and work with both hands free. At SIMON, a positioning device will be a re-bar hook with a chain or strap assembly. This positioning lanyard must always be backed up by either a shock-absorbing or retractable lanyard when exposed to a fall of 6 feet or 4 feet as specified in this program, so that at no time is the employee unconnected.

Retractable Lanyard: A deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and after the onset of fall, automatically locks the drum and arrests the fall.

Site Specific Plans: This program encompasses all SIMON activities. Generally site-specific plans are not utilized, but if they are a qualified person will be responsible for developing the plan.

Unprotected Sides or Edges: Any side or edge of a walking/working surface where there is no wall or guardrail system at least 39 inches high.

4.0 GENERAL REQUIREMENTS

4.1 Accident/Incident Investigation. Refer to Section 5 of this manual: **ACCIDENT-INCIDENT-CRISIS NOTIFICATION, RESPONSE, REPORTING, AND INVESTIGATION.**

4.2 Responsibility for Fall Protection. The SIMON Supervisor is responsible to ensure that all aspects of this Fall Protection Program are implemented.

4.3 When is Fall Protection Required? When any SIMON employee is working at elevations where a fall exposure exists of 6 feet or more on any SIMON construction operation and 4 feet or more at SIMON shops, emulsion plant, and hot mix asphalt plants, then 100% fall protection must be in place. Examples of specific areas where fall protection is required are as follows: unprotected sides and edges, exposed holes, on concrete forms and reinforcing steel, ramps, runways, walkways, and long-term stationary excavations (e.g.- sheeting/shoring, caissons, cofferdams).

4.4 What Fall Protection is required? The appropriate fall protection system or combination of systems as defined in this program must be selected and implemented by the SIMON Supervisor (e.g. - Guardrails or Personal Fall Arrest System).

4.5 Inspection of Fall Protection Systems.

4.5.1 Fall Protection Systems. A daily and routine visual inspection of fall protection systems must be done by the SIMON Supervisor. Inspection must be documented once per week on the Foreman's Weekly Safety Inspection Report or monthly on the Foreman's Monthly Safety Inspection Report, both found in Section 31 (**SAFETY INSPECTIONS**).

4.5.2 Body Harness and Lanyards. Each body harness and lanyard must be visually inspected before each use by the user. Inspection must be documented once per week or monthly on the Foreman's Safety Inspection Report**.**

4.5.3 Horizontal Lifeline System (HLS) for Bridge Beams. After initial set-up and inspection, the HLS must be visually inspected on a weekly basis and documented on the Foreman's Weekly Safety Inspection Report**.**

4.5.4 Defective Equipment. Any defective piece of a fall protection system must be removed from service immediately.

4.5.5 Shock Loaded Devices. Any fall protection device that is subjected to shock loading must be removed from service immediately. The Safety Department must be notified immediately.

4.5.6 Protection from Falling Objects. When SIMON employees, pedestrians, or motorists may be exposed to falling objects, the SIMON Supervisor must implement one of the following measures:

4.5.6.1 Erect toeboards, screens, mesh, fencing, or guardrail systems to prevent objects from falling from higher levels.

4.5.6.2 The SIMON Supervisor is responsible to erect overhead protection or prohibit SIMON employees from entering an area where materials may fall onto employees, roadway, or other area where a SIMON employee, pedestrian, or motorist may be traveling.

5.0 FALL PROTECTION SYSTEMS REQUIREMENTS

The SIMON Supervisor must ensure their work is in compliance with the fall protection system requirements as set forth in this section. Fall protection systems include guardrail systems, personal fall arrest systems, positioning devices, manufactured fall protection systems, and lifelines.

5.1 Guardrail Systems.

5.1.1 Wooden Guardrail Systems. A guardrail system consists of a top rail, mid rail, toeboard, and intermediate vertical posts.

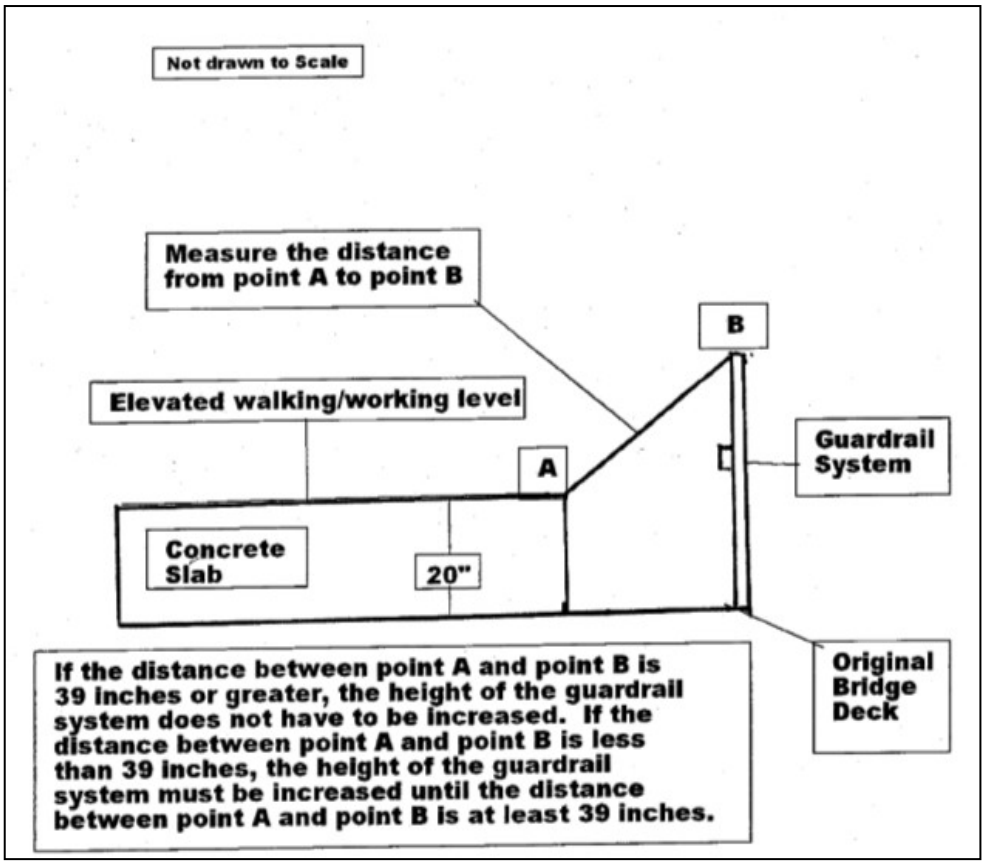
5.1.1.1 **Top Rail**. The top rail must be 42 inches +/- 3 inches (that is 39 inches to 45 inches) from the walking/working surface. When conditions warrant it, the top height of a guardrail must be raised to meet the needs of the job; refer to the diagram in heading 5.1.2 for the OSHA requirement. The minimum-sized lumber for a top rail is construction grade 2" x 4". The guardrail system must be capable of withstanding, without failure, a force of at least 200 pounds applied downward and outward within 2 inches of the top edge.

5.1.1.2 **Midrail**. Midrails must be installed half-way between the top edge of the guardrail and the working surface. This is 21 inches +/- 3 inches (18 inches to 24 inches). The minimum-sized lumber for a midrail is construction grade 1" x 6". The guardrail system must be capable of withstanding, without failure, a force of at least 150 pounds applied downward and outward at any point along the midrail.

5.1.1.3 **Toeboards**. Toeboards must be installed along the walking and working surface to prevent material from going over the edge. The minimum-sized lumber for a toeboard is a construction grade 1" x 4". The toeboard must be capable of withstanding, without failure, a force of at least 50 pounds applied downward and outward at any point along the toeboard. Screening, mesh, or like material will be erected where a 3 1/2" toeboard is not adequate to protect from material falling to a lower level.

5.1.1.4 **Vertical Upright Intermediate Posts**. Posts shall be at a maximum of 8 feet on center and placed on end, and the minimum-sized lumber for the intermediate posts is a construction grade 2" x 4".

5.1.2 Wooden Guardrail Systems raised higher than 45 inches. In some instances where the elevation of the walking and working surface is raised where a wooden guardrail system is in place, an additional top rail may be needed to provide adequate fall protection. In short, this means a 3-tiered guardrail. Refer to the diagram below for specific requirements:



5.1.3 Wire Rope Guardrail Systems. All outward and downward force requirements, height requirements, and toeboard requirements of heading 5.1.1 must be met.

5.1.3.1 **Guard wire for Top and Midrails.** Wire rope must be a minimum of 3/8" diameter in thickness. The top wire cannot have deflection lower than 39". At a minimum, two cable clamps must be used to secure a cable back to itself. The top wire must be flagged with high visibility ribbon or tape every 6 feet horizontally.

5.1.3.2 **Vertical Upright Intermediate Posts.** Steel posts used for vertical members must be schedule 40 or better and a maximum of 8 feet on center. Angle iron used for vertical members must be at least 2" x 2" x 3/8" or better and a maximum of 8 feet on center.

5.2 Personal Fall Arrest Systems

5.2.1 Full Body Harness and Lanyard System.

5.2.1.1 The body harness and lanyard system must be worn and utilized by any employee exposed to a fall on a walking or working surface with an unprotected side or edge 6 feet (4 feet for shops and plants) above a lower level where guardrails or a hole cover cannot eliminate the hazard.

5.2.1.2 The SIMON Supervisor may only purchase harnesses and lanyards (shock absorbing, retractable, or combination of) that have been approved by the SIMON Safety Department.

5.2.1.3 SIMON employees can only wear harnesses and lanyards purchased through the SIMON Supervisor.

5.2.1.4 This system will consist of a full body harness and 2 lanyards (shock absorbing, retractable, or combination of). One lanyard will be acceptable if 100% fall protection can be achieved.

5.2.1.5 The lanyards must be connected to the harness at the D-ring in the middle of the back.

5.2.1.6 Anchorage points must be capable of supporting a minimum force of 5,000 lbs. or a force two times the intended maximum load as identified in the fall protection manufacturer's specifications.

5.2.1.7 The harness and lanyard system must be attached so that an employee cannot free fall more than 6 feet nor contact a lower level.

5.2.1.8 Retractable lanyards, when used, must be set up so that horizontal travel is not more than one-quarter of the height from the work level to the anchorage point of the lanyard.

5.2.1.9 All personal fall arrest system equipment use must meet the requirements of the manufacturer.

5.2.2 Aerial Lift. Employees must wear a harness and retractable lanyard system and tie-off to the aerial lift all of the time while in the basket.

5.2.2.1 Wire rope lanyards will be used when there is a chance for contact with sharp edges.

5.2.2.2 To maintain the existing strength of any harness or lanyard, it will be stored safe from harmful fumes, heat, chemicals, moisture, sunlight, rodents, or other harmful agents.

5.2.3 Positioning Device System. Positioning devices used must meet the following minimum requirements.

5.2.3.1 Work positioning lanyards (e.g. - rebar hook with chain assembly) will be attached to the D-rings at the waist belt location.

5.2.3.2 The positioning device system must be rigged so that the employee's free fall distance will be $\leq$ 2 feet.

5.2.3.3 The positioning device must be secured to an anchor point capable of supporting at least two times the potential impact load of an employee's fall or 3,000 lbs., whichever is greater.

5.3 Hole/Floor Covers. Covers on roadways, **c**overs for holes in floors, and other walking/working surfaces will meet the following minimum requirements:

5.3.1.1 Covers in roadways will be capable of supporting—without failure—twice the maximum axle load of the largest vehicle expected to cross over the cover.

5.3.1.2 All other covers will be capable of supporting—without failure—twice the weight of the employee, equipment, and material that may be imposed.

5.3.1.3 All covers will be secured to prevent movement or displacement, and must extend adequately beyond the edges of the hole.

5.3.1.4 All covers shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.

5.4 Fall Protection System Not Specified in this Program. The SIMON Supervisor must ensure that fall protection system equipment not specified in this program meets all criteria set forth by the manufacturer at all times. Some examples are as follows: manufactured guardrail systems, engineered anchorage posts, mountain climber harnesses, specialized carabineers, etc. In addition, the SIMON Supervisor must consult with the Safety Department prior to purchase and use.

5.5 Lifeline Systems. Lifelines will meet the following minimum requirements:

5.5.1 Vertical Lifelines. Vertical lifelines will be able to support, and be attached to, an anchorage point that is capable of supporting 5,000 lbs. per person. Only one person can be attached to a vertical lifeline system. Vertical lifelines must be used with approved rope grabs for lanyard attachments.

5.5.2 Horizontal Lifelines. Horizontal lifelines must be designed by a Registered Professional Engineer or designed by a qualified person as determined by the most senior SIMON Supervisor-in-charge and meet all of the criteria set forth in this program and OSHA 29 CFR 1926, Subpart P- Fall Protection.

5.5.3 Horizontal Lifeline Systems (HLS) for Bridge Beams. HLS systems must be designed and stamped by a Registered Professional Engineer and/or meet all of the specifications as set forth by the manufacturer, both of which must be in accordance with all criteria in this program and OSHA 29 CFR 1926, Subpart P- Fall Protection.

5.6 Re-Bar, Reinforcing Dowels. Anytime there is a potential for an employee to fall onto (vertical) or into (horizontal) one of these items, every piece must have impalement protection in place. The general rule of thumb is that if a piece

of protruding re-bar is greater than or equal to 42” in vertical height from the walking/working surface then protection does not need to be provided. However, if employees are working at an elevation adjacent to vertical re-bars where it is less than 42” in vertical height from the walking/working surface, then it needs to be protected. Re-bar caps with a reinforcing steel plate, Carnie-Caps (yellow field goal posts), and job-built wooden troughs are examples of adequate impalement protection. Mushroom style caps are not acceptable for impalement protection.

5.7 Curb Pins, Sidewalk Pins, and Similar Material. Curb pins, sidewalk pins, and similar materials must be covered anytime that SIMON employees are not present in the immediate area where these materials are in place. This means that if there is any potential for a pedestrian to fall onto them, they must be covered. Where pins are driven flush with the concrete forms, protection is not required.

6.0 RESCUING AN EMPLOYEE AFTER A FALL

It is the responsibility of The SIMON Supervisor to ensure the prompt rescue of an employee(s) after a fall has occurred and the employee is suspended in the air. This can be done in one of a couple of ways. The first is to use an aerial lift that is being utilized on-site. The second is to utilize a straight ladder/extension ladder so that the employee can climb down. The third is to physically have the employee pulled back up to the working surface. And the fourth is to utilize the 911 emergency services, which must be coordinated prior to the job starting to ensure that rescue services are close enough to perform a rescue in a timely manner. If there are any other feasible ways to rescue an employee this must be determined by the SIMON Supervisor (competent person) in charge.

7.0 EMPLOYEE TRAINING PROGRAM

Each employee who will be exposed to fall hazards must be trained to recognize the hazards of falling and all aspects of this program as applicable. Under no circumstance can a SIMON employee be put into a fall hazard area without first receiving the proper training and education as conducted by the SIMON Safety Department or approved training consultant.

The SIMON Safety Department will set-up and conduct the training at the request of the SIMON Supervisor. This fall protection training course will cover the following areas: nature of fall hazards in the work area, correct procedure for erecting, maintaining, disassembling, and inspecting the fall protection system to be used, limitations of fall protection equipment used, correct procedure for handling and storage of equipment and materials, and other applicable criteria of OSHA 29 CFR 1926, Subpart M - Fall Protection.

Re-training will be supplemented by the SIMON Supervisor conducting tool-box meetings and when the SIMON Area Manager, Supervisor, or SIMON Safety Department determines that a refresher course needs to be completed. The training will be documented and records maintained by the SIMON Safety Department.

1.0 SCOPE

This program provides fire prevention and protection requirements in accordance with OSHA 29 CFR 1926, Subpart F-Fire Prevention and Protection, and other specific requirements of the OSHA 1926 regulations. This program encompasses the minimum requirements for compressed gas cylinders, welding and burning, concrete and winter heating, flammable and combustible liquids, construction projects, and plants/shops.

2.0 PURPOSE

The purpose of this program is to provide clear technical information and requirements on fire prevention and protection techniques for SIMON Supervisory personnel so that they can carry out all requirements specified herein.

3.0 DEFINITIONS

Approved Storage Cabinet: An approved cabinet is metal and purchased from an outside vendor supplier. The cabinet must be safety yellow with red lettering indicating "**Flammable- Keep Fire Away**".

Combustible Liquid: Liquids with flash points above 140 degrees Fahrenheit (e.g. - diesel fuel). A basic description is that the liquid will ignite only if a saturated wick is lit.

Flammable Liquid: Liquids with a flash point below 140 degrees Fahrenheit (e.g. - gasoline, mixed gas). A basic description is that the liquid will ignite if you drop a match into it.

LP Gas: Liquefied petroleum gas. It includes any material which is composed predominantly of any of the following: hydrocarbons, or mixtures of them, such as, propane, propylene, butane, and butylene.

Metal Safety Can: An approved closed container, of no more than a five-gallon capacity, having a flash-arresting screen, spring-closing lid and spout cover, and so designed that it will safely relieve internal pressure when subjected to elevated temperatures or fire exposure.

Portable Tank: A tank that has more than a 60-gallon capacity, and is not intended for a fixed location.

4.0 SIMON SUPERVISOR RESPONSIBILITY

The SIMON Supervisor and/or Supervisors in charge of work operations on any construction job-site, plant, shop, or facility is responsible to ensure all criteria in this program are met and satisfied.

5.0 COMPRESSED GAS CYLINDERS

The following fire prevention and protection requirements for compressed gas cylinders are as follows:

5.1 Confined Spaces. Compressed gas cylinders are not permitted in confined spaces.

5.2 Electrical Wiring and Lines. Electrical lines and wiring must be kept away from and be prevented from contacting cylinders.

5.3 Empty Cylinders. Empty cylinders should be marked as "Empty" or "MT" and are required to be returned to the storage area in a timely manner.

5.4 Gauges and Regulators on Cylinders. Do not leave gauges and regulators on cylinders overnight**.**

5.5 Hoisting, Moving, or Transporting a Cylinder. When cylinders are hoisted, they must be securely bound on a cradle, sling board, pallet, or cart, which can safely support the entire load. Do not hoist cylinders by choker slings. When physically moving a cylinder, place the cylinder on its bottom edge and roll it. When transporting a cylinder(s) in a truck or vehicle, it must be secured and all fuel gases must be in an upright position.

5.6 Horizontal Position. Cylinders are not permitted to be used as supports, rollers, or otherwise rolled in a horizontal position.

5.7 Secured and Upright. Compressed gas cylinders must be secured in an upright position at all times except for short durations while actually being hoisted, carried, or transported across a job-site, plant, or shop.

5.8 Labeling. All compressed gas cylinders must be marked for the purpose of identifying the gas content with either the chemical or trade name of the gas (e.g. - propane).

5.9 Oil and Grease. Compressed oxygen will react violently with petroleum products. No oil or grease of any kind is permitted to come in contact with the valve, regulator, or any portion of an oxygen cylinder or apparatus.

5.10 Open Flames. Do not place cylinders in a location where they are subjected to an open flame, hot metal, or other source of artificial heat. Keep cylinders far enough away from actual welding or burning operations so that sparks, hot slag, or flame will not reach them.

5.11 Opening Fuel Cylinders. Do not open fuel gas cynliders more than one and one-half turns.

5.12 Valve Protection Caps. Valve caps must be in place and secured during transport, movement, and storage of full or empty cylinders.

5.13 Wrenches. All cylinders requiring a wrench for opening and closing must have the wrench available in the immediate area to facilitate closing of the cylinder during an emergency (keep the wrench on the cylinder at all times).

5.14 Storage of Cylinders.

5.14.1 Cylinders are not permitted to be placed in areas such as active roadways, stairwells, building perimeters, or in areas where potentially damaging objects may strike them or fall onto them.

5.14.2 To prevent the pressure increase in cylinders from reaching dangerous levels, they should be stored away from direct heat sources such as stoves, portable heaters, and direct sunlight.

5.14.3 All cylinders, except those in actual use or required for the day's supply, must be stored outside of buildings.

5.14.4 Cylinders must be stored away from areas adjacent to large amounts of combustible materials.

5.14.5 When in storage, oxygen and fuel gases must be separated by a distance of no less than 20 feet, or by a five foot high non-combustible barrier having a fire resistance rating of at least one-half hour.

6.0 CONCRETE AND WINTER HEATING

The following fire prevention and protection requirements for concrete and winter heating are as follows:

6.1 Air Quality. Depending on the size of the area being heated, air quality checks for oxygen levels and carbon monoxide will be required. This will be determined by the Area Manager in conjunction with the SIMON Safety Department.

6.2 Cylinders and Heaters. Fuel gas cylinders must be kept six feet away from heaters.

6.3 Fire watch. A fire watch may be required for heating operations. This determination will be made by the Area Manager in conjunction with the SIMON Safety Department.

6.4 Fire Extinguishers. At least one 20-lb. ABC multipurpose fire extinguisher must be located within 50 feet of every winter concrete heating operation. More extinguishers will be required so that at no time shall any employee be required to travel more than 100 feet to locate a fire extinguisher. The fire extinguisher(s) must be inspected on a daily basis by the SIMON Supervisor-in-charge or designee. A discharged fire extinguisher(s) must be replaced immediately.

6.5 Heaters. Heaters must be placed at a sufficient distance as to not transfer heat to tarps or exterior walls designed to keep heat in. A general rule of thumb is 10 feet.

6.6 Heaters on Combustible Surfaces. Do not place heaters on combustible surfaces (e.g. - a wooden floor). A non-combustible surface (e.g. - sheet metal) must be placed between the heater and the floor.

7.0 FIRE EXTINGUISHER GENERAL TRAINING AND INSPECTION REQUIREMENTS

7.1 Fire Extinguisher Training. Each employee will receive training at their new-hire orientation prior to beginning work on the general principles of fire extinguisher use and the hazards involved in incipient stage firefighting. Fire extinguisher training will be addressed thereafter on an annual basis through tool-box safety training.

7.2 Fire Extinguisher Inspections. Construction Supervisors are required to conduct a weekly visual check of their fire extinguishers and document the inspection on their Weekly Safety Inspection Checklist (Section 31 – **SAFETY INSPECTIONS**). Plant/shop/fixed location Supervisors are required to conduct a monthly visual check of their fire extinguishers and document the inspection on their Monthly Safety Inspection Checklist (Section 31). Replace fire extinguishers in deficient or uncharged condition in a timely manner.

ALL fire extinguishers must be given an annual maintenance check. This includes, but is not limited to: all extinguishers in job trailers, mobile equipment, Supervisor pick-up trucks, HMA plants, fixed locations, etc. This must be done by an outside vendor that specializes in this type of work.

7.3 Fire Watch Training. Employees assigned to fire watch will be trained on fire extinguishers as outlined above in heading 7.1, and work area familiarity, prudent fire watch techniques, and fire alarm procedures for sounding an alarm where applicable on SIMON projects.

8.0 FLAMMABLE AND COMBUSTIBLE LIQUIDS

The following fire prevention and protection requirements for flammable and combustible liquids are as follows:

8.1 Fire Extinguishers. At least one 20-lb. ABC multipurpose fire extinguisher must be located within 25 feet of any flammable and/or combustible liquid storage area exceeding 60 gallons.

8.2 Gas and Mixed Gas Cans. Safety cans as defined in heading 4.0 must be used to hold quantities up to 5 gallons.

8.3 Indoor Storage. No more than 25 gallons of flammable liquids are permitted to be stored in any one room or building unless it is in an approved metal storage cabinet.

8.4 Approved Storage Cabinet Allowable Quantities.

8.4.1 Number of Cabinets. No more than three cabinets are permitted in any one room or building.

8.4.2 Combustible Liquids. No more than 120 gallons of combustible liquids are permitted in an approved storage cabinet.

8.4.3 Flammable Liquids. No more than 60 gallons of flammable liquids are permitted in an approved storage cabinet.

8.5 Portable Fuel Storage Tanks (e.g. - diesel). Portable tanks are not permitted to be stored closer than 20 feet to any building. Tanks must be diked, have a spill containment basin, or be double lined. A dike or spill containment basin must be sufficient enough to catch the quantity of the maximum capacity of liquid stored in a tank.

8.6 Smoking or Open Flames. Smoking, open flames, or other sources of ignition are not permitted in areas where flammable and combustible liquids are stored or being dispensed for use. (e.g. - no smoking or open flames where equipment is being fueled). Signs stating "NO SMOKING OR OPEN FLAMES" must be located at all storage areas containing flammable liquids, materials, or compressed gas cylinders.

9.0 WELDING AND BURNING

The following fire prevention and protection requirements for welding and burning operations are as follows:

9.1 Confined Spaces. When welding, cutting, or heating in confined spaces refer to Section 9 **(CONFINED SPACES)** of this manual.

9.2 Equipment Safety. Any employee operating or using any type of welding and cutting equipment or fire extinguishing equipment must immediately report any equipment defects or safety hazards associated with such equipment and discontinue the use of equipment until its safety has been assured by the SIMON Supervisor. Repairs to equipment outlined in this section must be made by a qualified person.

9.3 Fire Extinguisher. At least one 10-lb or larger ABC multi-purpose fire extinguisher must be within 25 feet and line of sight to any welding or cutting operation.

9.4 Fire Watch. Where fire watches are required, a sufficient number of fire extinguishers or extinguishing media (i.e. - water hose) must be readily available for the fire watch to use. The fire watch must remain on duty for a minimum of ½ hour after the welding/cutting operation is completed, and in some cases this may be longer as determined by the SIMON Supervisor.

9.5 Flashback Arrestors. Flashback arrestors must always be used for cutting operations.

9.6 General Fire Prevention and Protection Measures.

9.6.1 Objects to be welded, cut, or heated must be moved to a designated safe location or, if the object cannot be moved, all movable fire hazards in the vicinity are required to be taken to a safe place. If it is not possible and employee safety cannot be ensured, then welding and cutting shall not be performed.

9.6.2 If the object cannot be moved, nor can fire hazards be safely moved, then measures must be taken to confine heat, sparks, and slag, and to protect the immovable fire hazards from them. Examples are as follows: guard shields, fire blankets, etc.

9.6.3 No welding, cutting, or heating is to be done where the application of flammable paint, or the presence of flammable materials, or heavy dust concentrations creates a hazard.

9.6.4 Before any welding, cutting, or heating is done on any structure that contains or previously contained flammable substances, the structure must be filled with water or cleaned, flushed, and then tested (e.g.- large fuel tank, gas tank, etc.) to ensure there is no residual flammable substances.

9.6.5 A fire watch is required when welding, cutting, brazing and/or soldering is performed near combustible materials and/or in locations where fire may develop.

9.7 Hot Work Permit. Where a hot work permit is required as determined by the SIMON Supervisor, an inspection of the work area must be completed prior to the commencement of hot work, and the completion of the written permit in Appendix 14A must be completed to authorize welding and cutting operations.

9.8 Hoses. The following are general requirements for hoses.

9.8.1 Fuel gas and oxygen hoses must separate and be easily distinguishable by either touch or color (e.g. - green for oxygen and red for acetylene).

9.8.2 When hoses are taped together, no more than 4 inches in any length of 12 inches can be covered.

9.8.3 Hoses must be inspected at the beginning of each work shift by the SIMON employee using the hoses for burning.

9.8.4 Storage boxes used to store hoses must be vented.

9.8.5 Hose couplings must not be of the type that cannot be unlocked or disconnected by means of a straight pull without rotary motion.

9.9 Lead Based Paint and Related Metals. Where welding and cutting operations will take place on Lead Based Paint and Related Metals (i.e. - lead, cadmium, chromium, barium, arsenic, exotic metals, etc.) refer to Section 19 (**LEAD WORK AND RELATED METALS**), and Section 29 (**RESPIRATORY PROTECTION**) of this manual to ensure that all requirements are met prior to performing any work operations.

9.10 Regulators and Gauges. Oxygen and fuel gas pressure regulators, including their related gauges, must be in proper working order.

9.11 Torches. The following are general requirements for torches.

9.11.1 The SIMON employee using the torch must inspect shutoff valves for leaks, hose couplings, and tip connections. Do not use defective torches.

9.11.2 Torches must be lit by friction devices and are not permitted to be lit by matches or from hot work.

9.12 Welder and Supervisor Training. Welders and Supervisors of welders will be trained and educated in the safe use of all welding and cutting equipment and in safe practices/procedures as they relate to the welding process. AWS welding certification is an example of suitable training, education, and certification.

9.13 Use of Fuel Gases (e.g. - Acetylene). Before a regulator to a cylinder valve is connected, open the valve slightly and close it immediately. (This action is generally termed cracking and is intended to clear the valve of dust or dirt that might otherwise enter the regulator.) The SIMON employee cracking the valve must stand to one side of the outlet, not in front of it. Do not crack the valve of a fuel gas cylinder where the gas might reach welding work, sparks, flame, or other possible sources of ignition.

Always open the cylinder valve slowly to prevent damage to the regulator. For quick closing, do not open valves on fuel gas cylinders more than 1-1/2 turns. When a special wrench is required, leave it in position on the stem of the valve while the cylinder is in use so that the fuel gas flow can be shut off quickly in case of an emergency. In the case of manifold or coupled cylinders, at least one wrench must always be available for immediate use. Do not use fuel gas from cylinders through torches or other devices that are equipped with shutoff valves without reducing the

pressure through a suitable regulator attached to the cylinder valve or manifold. Before a regulator is removed from a cylinder valve, always close the cylinder valve and release the gas from the regulator.

When the valve on a fuel gas cylinder is opened, and if a leak is found around the valve stem, close the valve and tighten the gland nut. If this action does not stop the leak, discontinue use of the cylinder, and properly tag and remove it from the work area. In the event that fuel gas should leak from the cylinder valve rather than from the valve stem and the gas cannot be shut off, properly tag and remove the cylinder from the work area. If a leak should develop at a fuse plug or other safety device, properly tag and remove the cylinder from the work area.

10.0 CONSTRUCTION PROJECTS

The following are general fire prevention and protection requirements for all SIMON construction projects.

10.1 Exits. All doors on office and/or job trailers must be clearly marked as EXIT. A white sign with red lettering is required to be posted above the door.

10.2 Fire Extinguisher Inspections. Fire extinguishers must be visually inspected by the SIMON Supervisor or designee and documented on the weekly safety inspection report in Section 31 (**SAFETY INSPECTIONS**). Defective or discharged fire extinguishers must be replaced in a timely manner.

10.3 Equipment and Vehicles. Field Supervisor trucks must be equipped with at least one 5-lb. ABC multipurpose fire extinguisher. All mobile construction equipment, vehicles, trucks, etc. must be equipped with at least one 10-lb. ABC multipurpose fire extinguisher mounted inside of the cab or in close proximity to the operator station.

10.4 Job Offices or Office Trailers. Each office must be equipped with at least one 20-lb. ABC multi-purpose fire extinguisher. The fire extinguisher(s) must be mounted on the wall, have a clearly legible sign indicating "FIRE EXTINGUISHER," and have a clear access way to the fire extinguisher.

10.5 Welding and Cutting Operations. At least one 10-lb or larger ABC multi-purpose fire extinguisher must be within 50 feet and line of sight to any welding or cutting operation.

10.6 Concrete and Winter Heating. Refer to heading 6.0 of this program.

11.0 PLANTS AND SHOPS

The following are general fire prevention and protection requirements for all SIMON plants and shops.

11.1 Exits. All doors on office and/or shop trailers must be clearly marked as EXIT. A white sign with red lettering is required to be posted above the door.

11.2 Fire Extinguishers. Fire extinguishers must be visually inspected by the SIMON Supervisor or designee and documented on the Monthly Safety Inspection Report in Section 31 (**SAFETY INSPECTIONS**). Defective or discharged fire extinguishers must be replaced in a timely manner. Requirements for equipment, vehicles, offices, buildings, and plants are as follows:

11.2.1 Equipment and Vehicles. All mobile construction equipment, vehicles, trucks, etc. must be equipped with at least one 10- lb. ABC multipurpose fire extinguisher mounted inside of the cab or in close proximity to the operator station.

11.2.2 Offices, Buildings, and Plants. Each office must be equipped with at least one 20-lb. ABC multi-purpose fire extinguisher. The fire extinguisher(s) must be mounted on the wall, have a clearly legible sign indicating "FIRE EXTINGUISHER", and have a clear access pathway to the fire extinguisher. Throughout the plants and buildings, 20-lb. ABC multi-purpose fire extinguishers must be provided for every 3,000 square feet of space and located so that the maximum travel distance for any employee to a fire extinguisher does not exceed 100 feet. In addition, regardless of floor space, each vertical level must be equipped with at least one 20-lb. ABC multi-purpose fire extinguisher.

HOT WORK PERMIT

DATE ISSUED:_____ (VALID UNTIL END OF SHIFT ONLY)

LOCATION OF HOT WORK:

_____

SIMON SUPERVISOR-IN-CHARGE (PRINT): _____

EMPLOYEE(S) PERFORMING HOT WORK OPERATIONS:

_____

_____

_____

DESIGNATED FIREWATCH:

_____

The location where this work will take place will be examined before the start of cutting/welding operations and all the appropriate precautions (**including any that exceed those outlined below**) will be taken.

Signed by SIMON Supervisor-in-charge (prior to issue of permit):

_____

Date _____

FIRE SAFETY PRECAUTIONS

BEFORE THE WORK- All of the following precautions must be taken (check boxes):

- ❑ Cutting and/or welding equipment must be thoroughly inspected and found to be in good repair, free of damage or defects.
- ❑ A multi-purpose dry chemical, portable fire extinguisher must be located such that it is immediately available to the work and is fully charged and ready for use.
- ❑ At least one fire alarm pull station or means of contacting the fire department (i.e. site telephone) must be available and accessible to person(s) conducting the cutting/welding operation.
- ❑ Floor areas under and at least 35 feet around the cutting/welding operation must be swept clean of combustible and flammable materials.
- ❑ All construction equipment fueling activities and fuel storage must be relocated at least 35 feet away from the cutting/welding operation.

WHERE APPLICABLE- The following precautions will also be taken before the work begins (check all boxes that apply):

- ❑ Fire resistant shields (fire retardant plywood, flameproof tarpaulin, metal, etc.), must cover combustible floors.
- ❑ Spark/slag catchers (fire retardant plywood, flameproof tarpaulins, metal, etc.) must be suspended below any elevated cutting/welding operation.
- ❑ All floor and wall openings must be covered to prevent sparks/slag from traveling to other, unprotected areas.
- ❑ Containers in or on which cutting/welding will take place must be purged of flammable vapors.

DURING/AFTER THE WORK- All of the following precautions must be taken (check boxes):

- ❑ Person(s) must be assigned to a fire watch during and for at least 30 minutes after all cutting/welding ceases.
- ❑ Fire watch person(s) are to be supplied with multi-purpose dry chemical, portable fire extinguisher and trained in its use, or other proper extinguishing media (i.e. - water hose).
- ❑ A fire alarm pull station or means of contacting the fire department (i.e. - site telephone) must be available and accessible to fire watch.

BEFORE HOT WORK SIGNATURES: By employees who are participating in the hot work and signing below, including but not limited to: fire watch, welder, and cutter, they are verifying that the location where this work will take place has been examined before the start of cutting/welding operations and all the appropriate precautions have been taken.

AFTER HOT WORK SIGNATURES: The work area and all adjacent areas to which sparks and heat might have spread (including floor levels above and below and on opposite side of walls) were inspected 30 minutes after the cutting and or welding operations ceased for the day and were found to be fire safe. All employees signing before hot work commenced must sign once work is safely completed.

	Signature 1	Signature 2
Date _____	Before _____	After _____
Date _____	Before _____	After _____
Date _____	Before _____	After _____
Date _____	Before _____	After _____
Date _____	Before _____	After _____
Date _____	Before _____	After _____

HAZARD COMMUNICATIONS (HAZCOM)	SECTION 15	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 5

1.0 SCOPE

This section will set forth the minimum requirements for all SIMON employees working with any chemical being utilized at SIMON. This section will specifically set forth requirements for providing information to employees about SIMON' written hazard communications program (Hazcom), chemicals, SIMON' master chemical inventory, correctly labeling chemicals, SDSs (what they are and where do you obtain them), employee Hazcom training, and all pertinent information regarding chemicals to ensure SIMON employees will be protected from chemical overexposure. Additionally, this section encompasses the requirements of OSHA 29 CFR 1910, Subpart Z- Hazard Communications (Hazcom).

2.0 PURPOSE

The purpose of this section is to provide accurate Hazcom information to all SIMON Supervisors and employees as required by OSHA 29 CFR 1910.1200 and to provide advance notice to SIMON Supervisors so that they can ensure proper planning and coordination is in place to reduce or eliminate the potential for employee chemical overexposure. This will be done by implementing prudent and appropriate safety measures to reduce or eliminate the chemical risk under the direction of SIMON Supervisors with assistance from the SIMON Safety Department.

3.0 HAZARD DETERMINATION

Chemical manufacturers and importers of chemicals that SIMON purchases are required to evaluate the chemicals they produce to determine if they are hazardous and are required to provide Safety Data Sheets (SDSs) to the end user. SIMON is the end user. For example, an acetylene cylinder is considered a chemical, and the acetylene supplier is required to supply SIMON with an SDS. SIMON will rely on the manufacturers' hazard determination provided on the SDS. SDS information and requirements are in heading 5.0.

4.0 CHEMICAL INVENTORY LIST

A master chemical inventory list for SIMON will be maintained by the SIMON Safety Department, including accompanying SDSs for each chemical on the list. This list will be updated periodically by the SIMON Safety Department along with accompanying SDSs. Because the updating of the chemical inventory list is such a large task, SIMON supervision is required to provide assistance as requested for performing this task.

5.0 SAFETY DATA SHEETS

Safety Data Sheets (SDS) are a significant part of this Hazcom Program. An SDS describes the hazard of the chemicals you may use or come into contact with while on the job. All chemical manufacturers, importers, distributors, and suppliers must develop and/or obtain an SDS and provide it to SIMON with a purchased chemical. SIMON will maintain and make accessible to all employees an SDS for each hazardous chemical used or stored at every job site, work area, company owned property, etc.

5.1 SDS Make-Up. An SDS must provide the following information:

5.1.1 Identification. Manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

5.1.2 Hazard(s) Identification. All hazards regarding the chemical; required label elements.

5.1.3 Composition/Information on Ingredients. Chemical ingredients; trade secret claims.

5.1.4 First-Aid Measures. Important symptoms/effects, acute, delayed; required treatment.

5.1.5 Fire-Fighting Measures. Suitable extinguishing techniques, equipment; chemical hazards from fire.

5.1.6 Accidental Release Measures. Emergency procedures; protective equipment; proper methods of containment and cleanup.

5.1.7 Handling and Storage. Precautions for safe handling and storage, including incompatibilities.

5.1.8 Exposure Controls/Personal Protection. OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

5.1.9 Physical and Chemical Properties. Characteristics such as density, ph., boiling point, etc.

5.1.10 Stability and Reactivity. Stability and possibility of hazardous reactions.

5.1.11 Toxicological Information. Routes of exposure; symptoms, acute and chronic effects; numerical measures of toxicity.

5.1.12 Ecological Information. Non-mandatory section.

5.1.13 Disposal Considerations. Non-mandatory section.

5.1.14 Transport Information. Non-mandatory section.

5.1.15 Regulatory Information. Non-mandatory section.

5.1.16 Other Information. Includes the date of preparation or last revision.

5.2 SDS Accessibility for SIMON employees. To ensure accessibility of SDSs to all SIMON employees, SIMON utilizes a web-based SDS inventory service. The service that SIMON uses is www.3eonline.com. SDS accessibility can be completed in two ways.

5.2.1 The first is the web based service, www.3eonline.com.

5.2.2 The second is to log in to www.simonsafe.com. The user name will always be: **SIMON**, and the password will always be: **MSDS**. All employees may get access to SDSs 365 days per year 24/7 through the web or telephone service. If the SIMON Supervisor is working in an area where web service or telephone service is not available, then he/she must go to the web service and print out a copy of the inventory and SDS for their respective area within the company and maintain it at all times on the job or project.

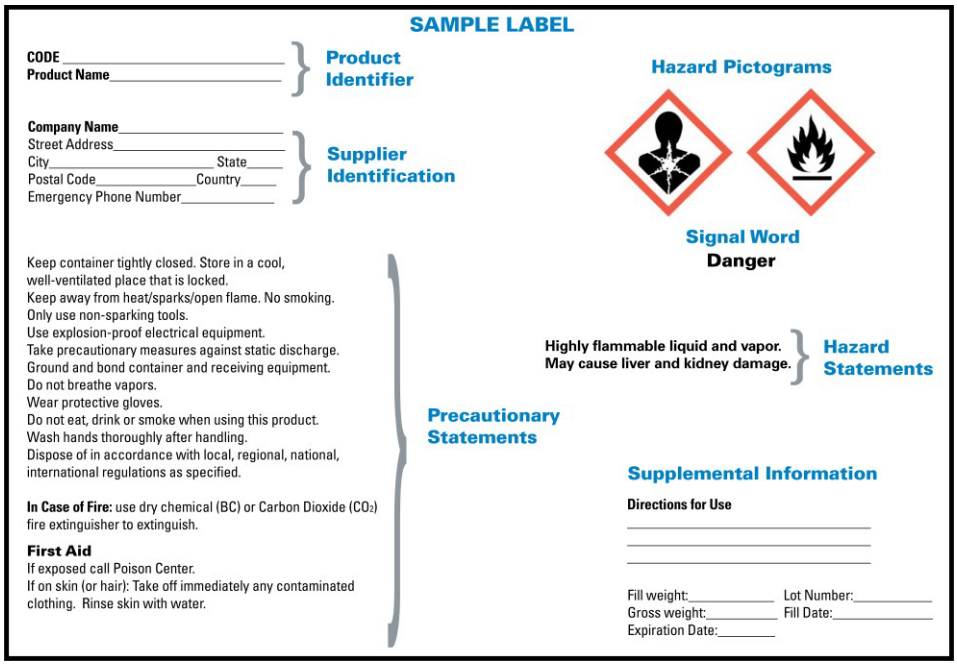
5.3 Site-Specific SDSs. If a chemical shipment is received where the SDS is not in the web based program, the Supervisor is responsible to get it to their safety representative in a timely manner so it can be uploaded into the system

5.4 No SDS With Chemical Received. The SIMON Supervisor is required to contact the supplier and request the SDS. Once obtained by the SIMON Supervisor, the SDS must be maintained as identified above in 5.3.

6.0 LABELING OF CHEMICALS

All chemicals or mixtures of chemicals must be properly labeled. Purchased chemicals must have the labels that are provided by the chemical manufacturer, importer, vendor, supplier, or other responsible party. For specific chemical containers such as gasoline, mixed gas, or diesel fuel, labels can be obtained through the SIMON Safety Department or through SIMON' approved safety equipment supplier. Do not deface or remove chemical safety labels under any circumstances.

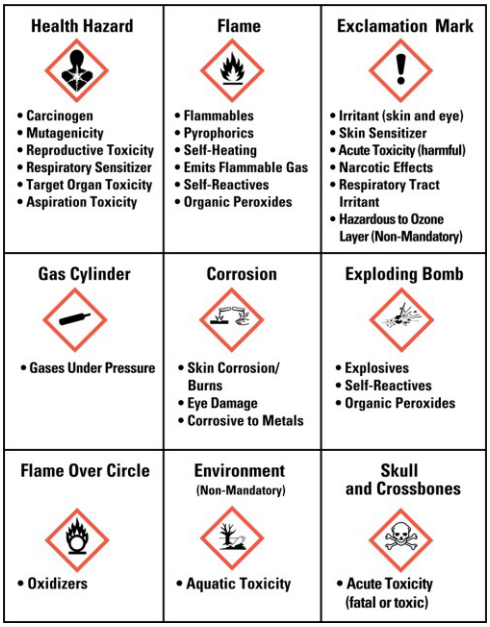
6.1 Labeling Requirements. Effective June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised label, identifying the required label elements is shown below. As indicated in 6.0, labels identifying chemical containers must contain the following information:



6.1.1 Product identifier. How the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in Section 1 of the SDS (Identification).

6.1.2 Signal word. There are only two signal words, "**Danger**" and "**Warning**." Within a specific hazard class, "Danger" is used for the more severe hazards and "Warning" is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a "Danger" signal word and another warrants the signal word "Warning," then only "Danger" should appear on the label.

6.1.3 Pictogram. OSHA's required pictograms must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame sufficiently wide enough to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label.



OSHA has designated eight pictograms under this standard for application to a hazard category. If a chemical has multiple hazards, multiple pictograms will be on the label. Pictograms are as follows:

6.1.3.1 **Health Hazard**. Pictogram that identifies chemicals and products which could lead to chronic (means slow developing) or sometimes acute health problems. Potential health hazards associated with this pictogram include: Carcinogens - which can lead to the development of a cancer; Mutagens – these can alter your DNA, which can lead to defects in future offspring; Reproductive Hazards - which can affect the ability of healthy men and women to conceive healthy children; Respiratory Sensitizers – this means you might have a hyper-allergic reaction when re-exposed to the chemical at even low levels after you have been initially over-exposed; Target Organ Toxicity – which means the chemical or products affects the normal function of specific organs (such as liver, kidney, blood, and others); and Aspiration Toxicity – this can lead to the development of chemical pneumonia.

6.1.3.2 **Flame**. Pictogram is associated with products and chemicals that are flammable or combustible. But it also appears on the label of pyrophoric materials, which in a gaseous state will ignite spontaneously in air at a temperature of 130 degrees Fahrenheit or below, as well as all self-heating materials, materials that emit flammable gas, self-reactive materials, and organic peroxides.

6.1.3.3 **Exclamation Mark**. Pictogram on their product label contains a hazardous material that, while still potentially harmful to your health or safety, represents the lower end of the scale for specific hazards.

6.1.3.4 **Gas Cylinder**. Pictogram that identifies compressed gases, which present various safety hazards. Products bearing this pictogram include compressed gases, dissolved gases, liquefied gases, and refrigerated liquefied gases.

6.1.3.5 **Corrosion**. This pictogram is specific to certain types of chemicals such as acids and bases, inorganic salts, aldehydes, phenols, and surfactants that can have a corrosive effect on skin and membranes.

6.1.3.6 **Exploding Bomb**. Products bearing this pictogram are capable of exploding.

6.1.3.7 **Flame over Circle**. This pictogram is specific to solids, liquids, and gasses that are classified as Oxidizers. DO NOT confuse this pictogram with the similar-looking "Flame" Pictogram, as that one identifies products and chemicals that are flammable. Oxidizers are gasses, such as oxygen, fluorine, and chlorine, which cause any combustible material (like wood or gasoline) to burn much more rapidly or intensely than normal.

6.1.3.8 **Skull and Crossbones**. Pictogram that identifies acute and potentially fatal toxicity hazards. The chemical may be highly toxic (poisonous) or fatal if swallowed, if contact is made with skin, and/or if it is inhaled.

6.1.3.9 **Environment**. Is a non-mandatory pictogram.

6.2 Hazard statement(s). Describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." All of the applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards, no matter what the chemical is or who produces it.

6.3 Precautionary statement(s). Means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.

6.4 Name, address and phone number of the chemical manufacturer, distributor, or importer. Mandatory to include all.

6.5 When are Labels Not Required? Labels are not required on any container into which a chemical or mixture is transferred by the employee from the labeled containers and which is intended for the immediate use by the employee who performs the transfer. If the temporary container (i.e. - 5-gallon gasoline can) leaves the possession of an

employee, the label must include a product identifier and words, pictures, symbols, or combination of them, which provide at least general information regarding the hazards of the chemicals.

7.0 EMPLOYEE INFORMATION AND TRAINING

All SIMON employees will receive general hazardous substance and Hazcom training at the time of their orientation. This training will be supplemented periodically throughout the calendar year with tool-box meetings by the SIMON Supervisor. In addition, the SIMON Supervisor is responsible to coordinate training with the SIMON Safety Department for hazardous substances prior to being encountered for a non-routine task on their job (e.g. - Lead Work), to which employees may be exposed under normal working conditions, foreseeable emergencies, or whenever a new non-routine chemical hazard is introduced into the Supervisor's work area.

Employees must be trained and educated on the following: requirements of the Hazcom regulation, any operation in the work area where hazardous chemicals are present, and the locations and availability of this program to include the chemical inventory list and accompanying SDSs. Training and education will also consist of physical and health hazards of chemicals in the work area, methods and observations that may be used to detect the presence or release of hazardous chemicals in the work area, measures employees can take to protect themselves, chemical labeling, SDSs, and how employees can obtain and use the appropriate hazard information.

8.0 GENERAL CONTRACTOR/SUBCONTRACTOR RESPONSIBILITIES

8.1 SIMON as a General Contractor. It is the responsibility of the SIMON Supervisor-in-charge to request all subcontractors' chemical inventory list and SDS for the job. A file must be set-up and kept at the job.

8.2 SIMON' Subcontractors. SIMON will make available to its subcontractors the chemical inventory list for the job and accompanying SDS upon request. This is the responsibility of the SIMON Supervisor-in-charge.

8.3 SIMON as a Subcontractor. SIMON will make available to the general contractor and/or owner of the project its chemical inventory list and accompanying SDS for the job. This is the responsibility of the SIMON Supervisor-in-charge.

HIGH VISIBILITY CLOTHING	SECTION 16	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

1.0 SCOPE

This policy covers all SIMON employees working on roadways, as well as projects and/or job sites adjacent to roadways. The policy is inclusive of owner-mandated requirements, State-mandated requirements, and specific SIMON mandated requirements.

2.0 PURPOSE

The purpose of this policy is to provide clarification on what type of high-visibility clothing SIMON employees are required to wear, the type of High-Visibility clothing that is acceptable, and when specific types of high-visibility clothing are required.

3.0 GENERAL REQUIREMENTS

The following are mandatory general requirements under this policy:

3.1 Class II Garment. At a minimum, all employees must wear an ANSI Class II approved vest or garment approved by the company, distributed by the company, or purchased through the company when working on or adjacent to all roadways 100% of the time.

3.2 SIMON' Standard Traffic Safety Vest. The standard vest is a CLASS II fluorescent orange vest with fluorescent striping, and company logo on the back. This is the only vest that can be purchased by supervision from SIMON' designated safety equipment supplier. In addition this is the only traffic vest allowed to be worn by employees.

3.3 Night Work. All employees must wear the SIMON standard traffic safety vest when working on or adjacent to all roadways 100% of the time.

3.4 Zipped Vests. Traffic vests while worn must be zipped at all times.

3.5 Owner (e.g. - DOT)/Contract Requirements. SIMON Employees will be required to wear additional high-visibility clothing when mandated by owner/contract requirements.

3.6 Additional High Visibility Clothing. When determined by the Area Manager in conjunction with the SIMON Safety Department, SIMON employees may be required to wear high-visibility clothing in addition to Class II apparel (e.g.- ANSI Class III apparel- includes vest and flagger pants).

4.0 FLAGGER REQUIREMENTS

4.1 Full-Time Flaggers (designated to flag for an entire shift or greater length). At a minimum, full-time employees classified as flaggers and employees required to flag for an entire shift or greater are required to wear the standard CLASS II traffic vest in combination with the fluorescent yellow pants with retro-reflective striping 100% of the time while flagging.

4.2 Other Flaggers. At a minimum, these employees are required to wear the standard CLASS II traffic vest for day work. For night work, in addition to the vest these employees must wear the fluorescent yellow pants with retro-reflective striping 100% of the time while flagging. These flaggers are employees who typically relieve a flagger for a break and/or flag for a "brief" period of time (e.g. - to flag a tri-axle into a traffic pattern).

4.3 Night Work. All flaggers must wear the SIMON standard traffic safety vest and flagger pants at all times while flagging.

HOUSEKEEPING	SECTION 17	
	EFFECTIVE DATE January 3, 20221	PAGE 1 of 2

1.0 SCOPE

This section sets forth general requirements for housekeeping at all SIMON job-sites, plants, facilities, and/or company occupied or owned property.

2.0 PURPOSE

The purpose of this section is to provide clear criteria for SIMON Supervisory personnel and all employees for housekeeping at all SIMON job-sites, plants, facilities, and/or company occupied or owned property.

3.0 GENERAL REQUIREMENTS

A clean and orderly job will have fewer delays, injuries, and lost or damaged tools and equipment. It takes planning, proper layout of work and storage areas, and coordination of work to "keep a clean house". In addition, good housekeeping is an investment that pays with increased productivity, and ultimately a clean house is a safe house. The mandatory criteria for all SIMON Supervisory personnel and all employees in regards to good housekeeping are as follows:

3.1 SIMON Supervisory Responsibility. It is the responsibility of SIMON Supervisors to ensure that good housekeeping practices are in place in their work area, and Supervisory personnel are responsible to ensure that employees working under their supervision are employing good housekeeping practices in accordance with this program.

3.2 Clean-Up. SIMON Supervisory personnel must make arrangements to have their job-site, plant, or facility cleaned as necessary. Cleaned as necessary means that cleaning must be done to ensure a clean work environment.

3.3 Company Vehicles. Company vehicles must be kept in a clean condition.

3.4 Electrical Cords, Welding Leads, Hoses, Etc. Keep these items out of walkways/aisle ways to prevent tripping hazards, or elevate them to a height sufficient enough to be out of walkways and work areas.

3.5 Equipment, Parts, and Tools. Arrange equipment, parts, and tool storage areas in a neat and orderly manner.

3.6 Flammable and Combustible Liquid and Compressed Gas Storage Areas. Keep combustibles (anything that will burn- paper, wood, trash, etc.) away from these areas.

3.7 Glass Drink Bottles. Glass bottles are permitted to be used, but must be properly and immediately discarded when emptied.

3.8 Job Office Trailers. Job office trailers must be kept in a neat, orderly, and clean manner. This means that floors must be periodically cleaned and indoor restrooms must be periodically cleaned.

3.9 Lunch and Food Waste. Lunch and food waste must be disposed of immediately in trash receptacles as generated. Food waste may not be left in work areas; this promotes an unhealthy work environment.

3.10 Mobile Equipment. The operator cab of mobile equipment must be kept in a clean condition. Food wrappers, trash, garbage, and/or excessive mud, are not acceptable. Cab glass must be kept clean in the interior and exterior.

3.11 Nails. All scrap lumber, forms, pallets, crates, and other lumber with protruding nails must have the nails pulled or bent down to prevent any SIMON employee from being exposed to an abrasion or impalement hazard.

3.12 Oily Rags. Dispose of oily rags separate from other trash. Containers for oily rags should metal with a lid to contain and prevent the spread of fire.

3.13 Rubbish, debris, waste, and useless material. Discard in a timely manner, and keep clear of work areas, passageways, aisles, stairs, and other access points.

3.14 Slip/Trips/Falls. Keep bridge decks, shop and plant walkways clean and clear of tripping hazards.

3.15 Trash Receptacles. Garbage and trash receptacles or containers must be provided for the collection of waste, trash, or other refuse. Garbage and trash must be disposed of at regular intervals to prevent build-up. Also, trash receptacles must be strategically placed around the work areas to aid in the elimination of cluttered work areas.

LADDER AND STAIRWAYS	SECTION 18	
	EFFECTIVE DATE January 3, 2022	PAGE 1 OF 4

1.0 SCOPE

This section applies to all work areas where employees must ascend and descend an elevation change of 19 inches or more whereby a stairway and ladder is required. In addition, this section encompasses the minimum safety requirements in accordance with OSHA 29 CFR 1926, Subpart X - Stairways and Ladders, and is to be used at all work areas.

2.0 PURPOSE

The purpose of this program is to provide clear technical information and safety requirements for stairways and ladder use for SIMON Supervisory personnel so that they can carry out all requirements specified in this program.

3.0 SIMON SUPERVISOR RESPONSIBILITY

The SIMON Supervisor and/or Supervisors in charge of work operations on any construction job-site, plant, shop, facility, or any other location are responsible to ensure all criteria in this program are met and satisfied. It is also the responsibility of the SIMON Supervisor-in-charge to ensure that a ladder, stairway, or ramp is utilized for safe access any time there is a vertical break in elevation of 19 inches or more.

4.0 DEFINITIONS

Rung: A ladder crosspiece of rectangular cross section placed on edge upon which a person may step while ascending or descending a ladder.

Fixed-ladder: A ladder that cannot be readily moved or carried because it is an integral part of a building or structure. A side-step fixed ladder is a fixed ladder that requires a person getting off at the top to step to the side of the ladder side rails to reach the landing. A through fixed ladder is a fixed ladder that requires a person getting off at the top to step between the side rails of the ladder to reach the landing.

Handrail: A rail used to provide employees with a handhold for support.

Maximum intended load: The total load of all employees, equipment, tools, materials, transmitted loads, and other loads anticipated to be applied to a ladder component at any one time

Point of access: All areas used by employees for work-related passage from one area or level to another. Such open areas include doorways, passageways, stairway openings, and various other permanent or temporary openings used for such travel.

Portable ladder: A ladder that can be readily moved or carried. Portable ladders are job-built, straight ladders, extension ladders, and step ladders.

Stair rail System: A hand rail consisting of a top rail and a mid-rail.

Unprotected sides and edges: Any side or edge (except at entrances to points of access) of a stairway where there is no stair-rail system or wall 36 inches or more in height, and any side or edge (except at entrances to points of access) of a stairway landing, or ladder platform where there is no wall or guardrail system 39 inches or more in height.

5.0 GENERAL REQUIREMENTS

5.1 The following are general requirements for stairway and ladder use:

5.1.1 Stairways and ladders will be free of protrusions and slippery surfaces before and during use.

5.1.2 Stairways and ladders must be clear of debris and materials.

5.1.3 Provide overhead protection when working above stairs and ladders—for example, stripping forms. Overhead protection should also be provided for stairs and ladders located below slab and deck edges.

5.1.4 Do not run electrical cords or wiring on stairs. If this must be done, secure to the edge of the stairs to prevent a trip hazard.

5.1.5 Place ladders on a firm and even surface.

5.1.6 Ladder sections will not be tied together to provide longer sections.

6.0 STAIRWAYS

The safety requirements for stairways are as follows:

6.1 Stairways and Landings.

6.1.1 Landings. Stairways will have landings of not less than 30 inches in the direction of travel and extend at least 22 inches in width at every 12 feet or less of vertical rise. There is one exception to this and it is at the HMA plants, where this will not be required if it is manufactured in this manner when it comes from a plant manufacturer or supplier.

6.1.2 Landing Guardrail Systems. Stairway landings with unprotected sides or edges will be protected by a standard guardrail system. Top rails must be installed 42" (+/- 3") from the top edge of the top rail to the stairway landing. Midrails must be installed midway between top edge of top rail and stairway landing surface. Toeboards must be installed where there is a potential that material if stored, could fall to a lower level and injure an employee.

6.1.3 Stairs Angle. Stairs will be installed between 30 and 50 degrees from horizontal.

6.1.4 Riser Height and Tread Depth. Must be uniform within each flight of stairs, including any foundation structure used as one or more treads of the stairs. Variations in riser height or tread depth shall not be over 1/4-inch in any stairway system.

6.1.5 Top Platform. Where doors or gates open directly on a stairway, a platform will be constructed such that the swing of the door will not reduce the effective width of the platform to less than 20 inches (e.g. - job trailer entrance door).

6.2 Stair rails and Handrails.

6.2.1 Stairways having 4 or more risers or rising more than 30", whichever is less, will be equipped with one handrail (between 36"-37" from upper surface of the rail to the tread surface), and midrails will be located at a height midway between the top edge of the top rail and the stairway treads.

6.2.2 Handrails and top rails must be able to withstand 200 lbs. of force in the outward and downward direction.

6.2.3 Stair rails and handrails shall be constructed without projection or abrasion hazards (e.g. - splintered handrails, sharp- projecting ends of the rails).

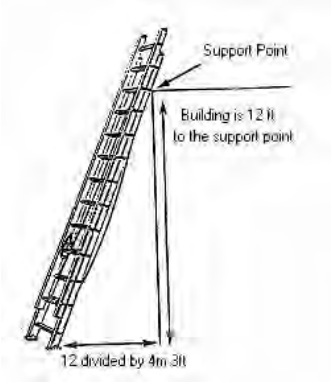
7.0 LADDERS

7.1 Portable Ladders.

7.1.1 Procedure for Use.

7.1.1.1 Place the ladder on a firm, even surface whenever possible. If the ladder must be placed on uneven ground, use a ladder leveler. These attach to the ladder rails and can be adjusted to balance the ladder.

7.1.1.2 Place the ladder base at a 1:4 ratio from the vertical. For every 4 feet of working height the base of ladder should be 1 foot out from the top support. The 1:4 ratio is 1 horizontal out for every 4 vertical feet of rise which is approximately a 75 degree angle. Refer to diagram below.



7.1.1.3 Ladders must be extended 3 feet above the top support point. Refer to diagram above.

7.1.2 General Ladder Safety Requirements.

7.1.2.1 Use ladders only in a vertical position. Ladders are not a substitute for a scaffold or a runway between two elevated surfaces.

7.1.2.2 Keep ladders away from the front of a door that opens toward the ladder unless the door is locked, blocked, or guarded.

7.1.2.3 Place a portable ladder so both side rails have secure footing. Provide solid footing on soft ground to prevent the ladder from sinking.

7.1.2.4 Place the ladder feet on a substantial and level base, not on movable objects.

7.1.2.5 Always lean ladders against secured backing.

7.1.2.6 Securely tie-off or otherwise fasten ladders to prevent slipping when using a ladder for access to high places.

7.1.2.7 Secure the bottom and top of a ladder to prevent displacement when using ladder for access to a scaffold.

7.1.2.8 Keep ladders away from electrical wiring.

7.1.2.9 Do not use aluminum or metal ladders in any location where they have the potential to come into contact with electrical wiring, overhead electrical wires, etc.

7.1.2.10 Only one person at a time will be permitted on a ladder.

7.1.2.11 Make sure step ladders are fully opened and the metal spreaders locked before you start to climb ladder.

7.1.2.12 Step ladders are not permitted to be leaned and used.

7.1.2.13 Never stand on the top step of a step ladder.

7.1.2.14 Keep ladders clean and grease free.

7.1.2.15 Portable ladders that will be used for an extended period of time as an access point must be securely fastened to prevent slippage.

7.1.2.16 SIMON employees must utilize 3 points of contact (1 hand and 2 feet) at all times when he/she is climbing or coming down a ladder.

7.1.2.17 Employees are not permitted to carry material up or down a ladder. A hand-line must be used (e.g. - hand-line with bucket to hoist and lower material).

7.1.2.18 Keep the body's center of gravity centered as much as possible between the hands and the foot that is in contact with the ladder when climbing up or down a ladder.

7.1.2.19 Always face a ladder when climbing or going down. Under no circumstance is any SIMON employee permitted to utilize a ladder and not face the ladder while climbing or going down.

7.1.3 Inspections

7.1.3.1 Ladders must be inspected prior to use to ensure they are in a safe condition. This must be documented on the weekly (construction) or monthly (plants and shops) safety checklist by the Foreman or appointed designee.

7.1.3.2 Defective ladders must be taken out of service, and defective ladders are not permitted to be repaired, unless authorized by the Supervisor-in-charge. The only type of repair allowed is shortening of a damaged ladder. Defective ladders must be discarded in a timely manner.

7.2 Fixed Ladders.

7.2.1 General Requirements.

7.2.1.1 Fixed ladders must be pitched 75 to 90 degrees.

7.2.1.2 Rungs must be able to bear a load of 250 pounds.

7.2.1.3 Rungs must be 16 inches wide.

7.2.1.4 Rungs must be spaced between 10 to 14 inches apart.

7.2.1.5 Hand or side rails must extend 42 inches above the top landing.

7.2.1.6 There must be a minimum clearance of 30 inches on the climbing side of ladders with a 90 degree pitch and 36 inches for a 75 degree pitch.

7.2.1.7 There must be 7 inches of clearance in the back of ladder to assure adequate footing.

7.2.1.8 Ladder cages must be attached to fixed vertical (90 degree from horizontal) ladders at heights greater than or equal to 24 feet, and the cage must begin between the height of 7 feet and 8 feet from the walking/working surface.

7.3 Job-Made Ladders.

7.3.1 General Requirements.

7.3.1.1 Lumber used to build job made ladders must be at least #2 Southern Pine, #2 Douglas fir, or finger joint lumber..

7.3.1.2 Rungs and cleats must be a minimum of 2-inch x 4-inch lumber. It is understood that cleats will be cut to fit.

7.3.1.3 Rung spacing must be a minimum of 8-inches and a maximum of 12-inches, with no more than ¼" variance between rails.

7.3.1.4 Cleats must be tight from rung to rung, and must be same material as rungs.

7.3.1.5 Double-headed nails are not permitted in the construction of job made ladders. Rungs and cleats must be fastened with 3 ½-inch (minimum length) 12d common nails.

7.3.1.6 The maximum length of job-made ladders is 24 feet.

7.3.1.7 Ladders that extend to a top landing must have a walkthrough built in.

7.3.1.8 The width of job-made ladders must not be less than 16-inches between side rails, and no more than 20-inches between side rails. Double ladders can be double the width plus the width of the side rails.

1.0 SCOPE

This section will set the minimum guidelines for the protection of employees performing work operations where there is any potential for exposure to Lead and Related Metals (Arsenic, Barium, Chromium, and Cadmium). Additionally, this section encompasses the requirements of OSHA 29 CFR 1926.62- Lead, and OSHA requirements set forth for the related metals.

2.0 PURPOSE

This program is to ensure compliance with all aspects of the OSHA requirements for Lead and related metals and to provide technical information for SIMON Supervisory personnel to do the following: meet the criteria set forth in the OSHA requirements, perform their duties as the competent person, ensure compliance with the personal protective equipment (PPE) requirements, ensure compliance with hygiene practices and decontamination procedures, ensure that medical surveillance is properly completed, ensure safety and health training is done, ensure that general engineering controls are in place, and be able to properly dispose of Lead and related metals containing materials, clothing, and PPE.

3.0 APPLICABILITY OF THIS PROGRAM

This Lead Work and Related Metals Program must be strictly followed if any one of the 3 following criteria are met:

3.1 Disclosure by the Owner/Client. The material to be impacted during the term of the project is known to contain Lead or related metals.

3.2 Material Testing. When a sample of suspect material to be encountered (e.g. - paint chips), tests positive for Lead and related metals after having been sent to a laboratory for analysis. Analysis must comply with EPA requirements.

3.3 Work Impacting Known Lead Based Paint. Any work occurring that will impact Lead based paint as identified in heading 5.0 of this program – Sources for Lead Exposure.

4.0 DEFINITIONS

Action Level: An employee exposure, without the use of a respirator, to an airborne concentration of Lead of 30 micrograms per cubic meter of air (30 ug/m^3) calculated as an 8-hour time weighted average.

Competent Person: The competent person is the on-site SIMON Supervisor conducting the Lead and related metals work who through training, education, and experience is knowledgeable about all criteria required in this program. This SIMON Supervisor will also be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees, and this SIMON Supervisor does have the authority to take prompt corrective action to ensure the work as required by this program is safe.

SIMON Supervisor: The Supervisor directly in charge of the work operations.

Lead: Metallic lead, all inorganic lead compounds, and organic lead soaps.

Permissible Exposure Limit (PEL): The maximum concentration of Lead in air that a SIMON employee can be exposed to an average of 8 hours without the use of a respirator. The PEL for Lead is 50 micrograms per cubic meter of air (50 ug/m^3).

Related Metals: Periodically other metal compounds have been found in the Lead paint SIMON employees are impacting. The type, combination, and percent concentration of these metals varies in the paint. These metals are as follows: Arsenic (As), Barium (Ba), Chromium (Cr), and Cadmium (Cd).

Work Area: This is the area as determined by the SIMON Supervisor that is demarcated by signage and caution tape (where feasible) and only employees performing the Lead work are permitted to enter. Any other person that needs to be in the area is required to comply with all requirements of this program. Any person outside of the work area is not required to comply with this program.

5.0 SOURCES FOR LEAD EXPOSURE

5.1 The potential for SIMON employees to be exposed exists primarily during bridge work where Lead-based paint exists. Other work operations may contain Lead-based paint, and these operations will need to be evaluated on a case by case basis by the SIMON Supervisor and SIMON Safety Department. Lead becomes a direct hazard to the human body when it is consumed either through ingestion (eating it) or inhalation (breathing it in).

The following work operations on Lead-based paint that generate Lead exposure include but are not limited to the following: sandblasting, needle gun operations, needle scaler operations, grinding, welding/burning, and any other similar operation which generates Lead dust and/or Lead fume.

5.2 RELATED METALS

When it is known that any one of the related metals (Arsenic, Barium, Cadmium, Chromium), is determined to be in the Lead-based paint, then it is the responsibility of the SIMON Safety Department to ensure the following criteria are met and incorporated into requirements of this program.

5.2.1 Medical Surveillance. Will be completed for each employee by the Licensed Physician for each specific metal known in accordance with the OSHA requirements.

5.2.2 HazCom Training. Will be completed for each employee for each specific metal known in accordance with the OSHA requirements.

5.2.3 Air Testing. Breathing zone and area air samples will be conducted in accordance with prudent Industrial Hygiene Techniques for each specific metal known in accordance with the OSHA requirements.

5.2.4 Signage and Labeling. Ensure that the SIMON Supervisor has the appropriate caution, warning, and danger job signage and waste labels for each specific metal known in accordance with the OSHA requirements.

6.0 NOTIFICATION TO SUBCONTRACTORS AND ON-SITE CONTRACTORS

The SIMON Project Manager and/or Construction Manager is responsible to notify (in writing) subcontractors and on-site contractors of the existence of Lead based paint and related compounds, and of the work operations SIMON employees will be performing to impact the paint. This written notification must inform them of their responsibility to comply with all criteria in OSHA 29 CFR 1926.62- Lead. If applicable, notification of related metals must be included.

7.0 MEDICAL SURVEILLANCE

7.1 Biological Monitoring. Prior to any SIMON employee performing work operations that impact Lead-based paint, it will be the responsibility of the most senior SIMON Supervisor on the job-site to notify the SIMON Safety Department of the employees who will be performing the work. This must be done with sufficient notice. Once notified, the SIMON Safety Department will set-up an appointment with the Licensed Physician for each employee to be trained in the medical surveillance program. Medical surveillance will include training in the respirator program as required in Section 29 (**RESPIRATORY PROTECTION**) of this manual and into a biological monitoring program. The biological monitoring program is in the form of blood sampling and analysis.

7.1.1 Blood Testing (Pre-Work). Each employee will be required to take a blood test for Lead in blood, and for Zinc Protoporphyrin levels prior to conducting any Lead work. Each employee will be notified in writing by the SIMON Safety Department of his or her results within 7 calendar days.

The results must indicate a level of Lead in blood of less than 40 micrograms per deciliter (40 ug/dl) for the employee to be able to do this work. Any result greater than 40 will prohibit the employee from performing Lead work until further blood testing as required by OSHA 29 CFR 1926.62 (j) shows levels below 40 ug/dl.

7.1.2 Blood Testing (Post-Work). Each employee will be required to take a blood test for Lead in blood, and for Zinc Protoporphyrin levels within 60 days of completing the Lead work. Each employee will be notified in writing by the SIMON Safety Department of his or her results within 7 calendar days.

The results must indicate a level of Lead in blood of less than 40 micrograms per deciliter (40 ug/dl) for the employee to be able to continue doing this work. Any result greater than 40 will prohibit the employee from performing any Lead work until further blood testing as required by OSHA 29 CFR 1926.62 (j) shows levels below 40 ug/dl.

7.1.3 Long-Term Lead Work. Anytime a SIMON employee level of exposure is equal to or greater than the action level for 30 days or more in any 12- month period, all aspects of the medical surveillance requirements in OSHA 29 CFR 1926.62 (j) will be met. The SIMON Supervisor will be responsible to ensure this occurs with the assistance from the SIMON Safety Department.

8.0 EMPLOYEE TRAINING

Every SIMON employee exposed to Lead at or above the action level must receive safety and health training annually. This safety and health training will be provided by the SIMON Safety Department. Training will include the following:

8.1 Requirements of the Hazcom standard, including warning signs, labels, SDS's, etc.

8.2 The contents of OSHA 29 CFR 1926.62- Lead.

8.3 The specific nature of the work operations and how Lead exposure can occur.

8.4 Respiratory protection training as outlined in Section 29 **(RESPIRATORY PROTECTION)** of this manual.

8.5 Medical surveillance program.

8.6 Engineering controls and work practices.

8.7 The Site-Specific Lead Work and Related Metals Program.

8.8 The Lead Awareness and Safe Work Practices training information page—Appendix 19A of this program—will be used to supplement the training provided by the SIMON Safety Department.

9.0 SITE-SPECIFIC LEAD PROTECTION PROGRAM

A Site-specific Lead Work and Related Metals Program is required on any job that is performing this work. The site-specific program will be put together by the SIMON Safety Department, will be reviewed with all employees performing the work, and issued to the SIMON Supervisor performing the work. This program must be utilized and maintained for the duration of the project by the SIMON Supervisor.

10.0 GENERAL ENGINEERING CONTROLS

The use of general engineering controls will depend on project logistics and configuration. The following is a list of items that are required to be in place before the start of any Lead work.

10.1 Permit-only employees that are absolutely necessary to the operation in the work area.

10.2 Power tools used for the removal of Lead-based paint must be equipped with dust collection shrouds or other attachments exhausted through a HEPA vacuum system. Needle guns are required unless determined to not be feasible by the SIMON Supervisor with input from the SIMON Safety Department.

10.3 At a minimum, 3-feet-long handled torches must be used for burning and cutting operations.

10.4 Warning signs must be posted around the perimeter of the work area. Signs must state the following: **WARNING-HAZARD, LEAD WORK AREA,** and **NO SMOKING EATING OR DRINKING**.

10.5 The environmental impact on surrounding areas must be considered. All reasonable precautions must be taken to avoid contamination of surrounding public or private properties, including streams, rivers, or lakes.

11.0 AIR TESTING

11.1 Air testing will be set-up and completed for Lead and applicable related metals by the SIMON Safety Department. An outside independent testing firm will be used for these purposes. This testing will be done for representative breathing zone samples and area samples around the perimeter of the work area. The need for air testing will be determined by the SIMON Safety Department in accordance with prudent Industrial Hygiene techniques, requirements of OSHA 29 CFR 1926.62(d), applicable related metal requirements, and at least annually.

11.2 Written Notification. Employees will be notified in writing of the results of the breathing zone samples within 7 calendar days of receiving the results. This will be done by The SIMON Safety Department. The Personal Air Quality Monitoring Notification Form can be found in Appendix 19B of this program.

12.0 PERSONAL PROTECTIVE EQUIPMENT

SIMON employees performing Lead work will wear the following Personal Protective Equipment:

12.1 Gloves. Nitrile or Neoprene Gloves, or standard work gloves.

12.2 Full Face Piece Positive Air Purifying Respirator (PAPR). This respirator must have an Assigned Protection Factor (APF) of 1,000. Prior to wearing the PAPR, SIMON employees must be trained in and meet all the requirements of the Respiratory Protection program in Section 29 **(RESPIRATORY PROTECTION)** of this manual. This respirator must be approved through the SIMON Safety Department.

12.3 Coveralls. Disposable fire resistant Tyvek or standard work coveralls to be worn over regular work clothes.

12.4 Boots. Yellow concrete boots or equivalent.

13.0 HYGIENE FACILITIES AND PRACTICES

13.1 Change Area. Employees must be decontaminated in a designated change area when leaving the work area. Proper decontamination steps are in the following order:

13.1.1 Rinse or wipe off over-boots, hardhat, and gloves.

13.1.2 Over-boot and hard hat removal.

13.1.3 Coverall and glove removal.

13.1.4 Place all Lead-contaminated clothing and materials in the designated trash disposal container (e.g.- 55-gallon drum)

13.1.5 Respirator removal and clean with respirator wipes.

13.1.6 Dispose of wipes in the designated trash disposal container.

13.1.7 Field wash hands and face with either water or cleaning products (e.g. - soap solution).

13.2 Eating Area. The SIMON Supervisor must decide on an area which is free of Lead dust and Lead contamination, and is away from the work area for the employees to eat. Employees performing the Lead work are not permitted to eat, smoke, chew tobacco, chew gum, or take a drink until their hands and face have been thoroughly washed and they are in the designated eating area.

14.0 DISPOSAL OF LEAD CONTAINING MATERIALS (INCLUDING PPE)

The SIMON Supervisor will coordinate with the SIMON Environmental Department for proper disposal of all Lead and related metal containing materials. All applicable state or federal regulations will be followed.

14.1 Construction Debris. Disposal will be completed as per the State/Federal Department of Environmental Protection (DEP) requirements in accordance with input from the SIMON Environmental Department.

14.2 Personal Protective Equipment. PPE will be put in a suitable container until it can be disposed of in the same manner as construction debris. The PPE container must be labeled with the following wording**: CAUTION, CONTAMINATED WITH LEAD,** and **DO NOT REMOVE DUST BY BLOWING OR SHAKING.**

PEL (Permissible Exposure Limit): Action Level is 30 micrograms/cubic meter, and the PEL is 50 micrograms/cubic meter.

1.0 HEALTH HAZARDS

1.1 Lead can be absorbed into the body by inhalation (breathing) and ingestion (eating). Lead is not absorbed through the skin.

1.2 Long term health effects if inhaled or ingested.

1.3 Short-Term: It can kill in a matter of days if large enough doses are taken in. Can affect the brain—called acute encephalopathy—in the form of seizures and coma. Short Term exposures like this are highly unusual, but not impossible.

1.4 Long-Term: Damage to blood forming, nervous, urinary, and reproductive systems.

1.5 Symptoms of long-term overexposure are: loss of appetite, metallic taste in mouth, anxiety, constipation, nausea, pallor, tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain, tremors, numbness, dizziness, hyperactivity, and colic (severe abdominal pain). Encephalopathy as in the acute effect.

2.0 HEALTH PROTECTION GOALS OF STANDARD

2.1 Exposure to Lead throughout a lifetime requires that a worker's blood lead level (BLL), be maintained at or below 40 micrograms/deciliter. To protect fertility, it must have an average over the lifetime at or below 30 micrograms/deciliter.

2.2 Once levels rise above 40, the risk of negative health effects increases. Prolonged over-exposure also increases the risks.

2.3 Best prevention is to keep blood lead level below 40.

3.0 PERSONAL HYGIENE AND PROTECTIVE CLOTHING

3.1 Follow these procedures before beginning work:

3.1.1 Change into work clothing and shoe covers in the clean section of the designated change area.

3.1.2 Use work garments of appropriate protective gear, including respirators, before entering the work area.

3.1.3 Store any clothing not worn under protective clothing in the change area.

3.1.4 Ensure that respirator has been cleaned.

3.2 Follow these procedures upon leaving the work area:

3.2.1 HEPA vacuum heavily contaminated protective work clothing while it is still being worn.

3.2.2 Remove shoe covers and leave in the work area.

3.2.3 Remove protective clothing in work area, and carefully roll down the garment to reduce exposure to dust.

3.2.4 Remove respirators last. Also, clean prior to putting on again.

3.3 Follow these procedures after shift:

3.3.1 Place disposable coveralls or coveralls and shoe covers in the designated waste can.

3.3.2 Clean any protective gear—respirator, hard hat, etc.—that will be worn again.

3.3.3 Wash hands and face.

3.3.4 Immediately shower and wash hair upon going home.

3.4 RESPIRATORS

3.4.1 Must be worn 100% of the time while work operations are taking place.

3.4.2 Must be cleaned every time they are removed, prior to putting back on the face. Disposable respirator wipes can be used for this.

3.5 OTHER GUIDELINES

3.5.1 Hands and face must be washed prior to eating, drinking, smoking, or applying cosmetics (chapstick), etc.

3.5.2 Biological monitoring must be done at least every 2 months for the first 6 months and every 6 months thereafter until the blood lead level is below 40 micrograms/deciliter. If blood lead is above 40, the frequency must increase from 6 months to every 2 months and not reduced until two consecutive tests indicate a blood lead level below 40 micrograms/dl.

3.5.3 **Burning Operations**- utilize the long-handled torch effectively.

Date Reviewed	Print Name	Signature

EMPLOYEE NOTIFICATION FORM	APPENDIX 19B	
	EFFECTIVE DATE January 3, 2022	PAGE 1 OF 1

EMPLOYEE NOTIFICATION FORM FOR PERSONAL AIR QUALITY MONITORING

(LEAD WORK AND RELATED METALS)

Employee Name: _____

Project:_____

Project No:_____

Air Sample No: _____

Sample Date: _____

Respiratory Protection:_____

As you know, SIMON monitored for occupational agents in your work place. Thank you for participating in this monitoring program and your cooperation is appreciated.

Exposure levels representative of your workplace are given below:

Agent Name	TWA Result	OSHA Permissible Exposure Level	Above Limit

Prepared by: _____

(Print Name)

(Signature)_____

Date: _____

1.0 SCOPE

This section sets the minimum requirements to be followed by SIMON Supervisory personnel and their employees while servicing or maintaining equipment in which unexpected energization or start-up of the machine or release of stored energy could cause injury. Additionally, this section encompasses the requirements of OSHA 29 CFR 1910.147- Subpart J, The Control of Hazardous Energy (lockout/tagout).

2.0 PURPOSE

The purpose of this lockout program is to provide information for SIMON Supervisory personnel to do the following: know when to initiate lockout procedures, meet the OSHA lockout/tagout requirements, meet the training requirements, and meet the periodic inspection requirements.

3.0 DEFINITIONS

Affected Employee: Any SIMON employee whose job requires the operation or use of a machine or equipment on which servicing and maintenance is being performed under lockout/tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

Authorized Employee: A SIMON employee who applies locks and tags to machines or equipment where maintenance or servicing is to be performed. The SIMON Supervisor-in-charge must authorize such an employee.

Energy Isolating Device: A mechanical device that physically prevents the transmission or release of energy. Examples are as follows: circuit breaker, disconnect switch, a line valve, etc.

Energy Source: Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, gravity, or other energy.

Lockout: The placement of a lockout device on an energy isolation device, in accordance with an established procedure, ensuring the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Lockout Device: A device that utilizes a positive means such as a lock to hold an energy isolating device in the safe or off position and prevent the energization of a machine or equipment.

LO/TO: Lockout/Tagout.

Servicing and/or maintenance: Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. These activities include lubrication, cleaning or un-jamming of machines or equipment and making adjustments or tool changes (e.g.- working on the millhead of a milling machine, or inside of the pug mill at an HMA plant), where the employee may be exposed to the unexpected energization or startup of the equipment or release of hazardous energy.

Tagout Device: A prominent warning device with a means of attachment, which is always securely fastened to an energy isolating device in accordance with the site specific established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tag-out device is removed. A tag-out device must always be used with a lock, unless the equipment, machine, or energy source is not equipped with such a device to lock it out.)

4.0 APPLICATION OF THE PROGRAM

4.1 This program applies to the control of energy during servicing and maintenance of machines and equipment, and when machines and equipment are being brought on-line or being taken out of service (e.g. - electrical switch gear, valves, controls, etc., while installation, construction or maintenance operations are in progress).

4.2 Servicing and/or maintenance which takes place during normal production operations is covered only if:

4.2.1 A SIMON employee is required to remove or bypass a guard or other safety device; or

4.2.2 A SIMON employee is required to place any part of his or her body into an area on a machine or piece of equipment where work is actually performed on the material being processed or where an associated danger zone exists during a machine operating cycle.

4.3 This program **does not apply** to work on cord and plug connected equipment of which exposure to the hazards of unexpected energization or start-up of the equipment is controlled and is under the exclusive control of the SIMON employee performing the service or maintenance. An example of this is an employee unplugging a pneumatic tool (e.g. - rivet buster) which he/she is working on.

5.0 LOCKOUT WRITTEN PROCEDURES

Site-specific procedures must be written for all machinery and/or equipment outlined in heading 4.0; writing out these procedures is the responsibility of the SIMON Supervisor-in-charge of the work operation. These procedures must be kept on site where the LO/TO procedure(s) will be conducted. The SIMON Safety Department is responsible to meet with the SIMON Supervisor-in-charge and review the site-specific procedures and verify their accuracy and effectiveness. The procedures must include the following:

5.1 A specific statement of the intended use of the procedure;

5.2 Specific procedural steps for shutting down, isolating, blocking, bleeding-off, and securing machines or equipment to control hazardous energy.

5.3 Specific procedural steps for the placement, removal and transfer of LO/TO devices.

5.4 Specific requirements for testing a machine or equipment to determine and verify the effectiveness of lockout/tagout devices, and other energy control measures.

6.0 GENERAL SAFE PRACTICES

6.1 No tags will be used in lieu of locks unless there is no place to physically install a lock.

6.2 No machine or equipment will be operated with a lock or tag attached regardless of the circumstances.

7.0 HARDWARE/DEVICES

7.1 LO/TO devices will be used only by SIMON authorized employees and for lockout purposes only. Locks may only be used for lockout. They are not to be used for any other reason.

7.2 SIMON Lockout devices will be:

7.2.1 Standardized within the plant, shop, or field in at least one of the following criteria: Color, shape, or size; additionally, in the case of tagout devices, print and format shall be standardized.

7.2.2 Durable to withstand the environment which they are exposed.

7.2.3 Identifiable by the SIMON authorized employee applying the device(s), (e.g. - color coded).

7.3 Tagout devices shall warn against hazardous conditions if the machine or equipment is energized and shall include a legend (e.g. - Do Not Start. Do Not Open. Do Not Close. Do Not Energize. Do Not Operate.)

7.4 Lockout devices and locks must be purchased by SIMON Supervisor-in-charge through the approved SIMON safety equipment supplier. The SIMON Safety Department must be notified by the SIMON Supervisor-in-charge of the type of lockout devices, locks, and tagout devices he/she is going to purchase.

8.0 GENERAL SEQUENCE OF LOCKOUT

8.1 Notify all affected employees that servicing, maintenance, start-up, or shutdown is required on a machine or equipment and that the machine or equipment must be shut down and locked out to perform the servicing or maintenance.

8.2 The authorized employee will refer to the company site-specific procedure to identify the type and magnitude of the energy that the machine or equipment utilized, will understand the hazards of the energy, and know the methods to control the energy.

8.3 If the equipment or machine is operating, shut the machinery down by the normal stopping procedure (press the stop button, open switch, close valve, etc.)

8.4 De-activate the energy isolating device(s) so the machine or equipment is isolated from the energy sources(s). There may be multiple energy sources (e.g. - electrical and air, or two electrical sources). If there are multiple energy sources, they all must be de-activated.

8.5 Lock out the energy isolating device(s) with assigned individual locks. This means that if multiple employees are working on the machine or equipment, then a multi-HASP must be used with each individual authorized employee fastening their own individual lock.

8.6 Apply the tag-out device in conjunction with the lock. Only one tag-out device needs to be applied to each individual energy source.

8.7 Stored or residual energy (hydraulic systems, air, gas, water pressure, etc.) must be dissipated or restrained by methods such as blocking, bleeding down, etc.

8.8 Ensure the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then **verify** the isolation of the equipment by operating the push button or normal operating control(s) or by testing to make certain the equipment will not operate. ***NOTE: CAUTION-Return operating control(s) to neutral or "off" position after verifying the isolation of the equipment.***

8.9 The machine or equipment is now locked out.

9.0 TESTING OR POSITIONING OF MACHINES/EQUIPMENT

In situations where the lockout/tagout device must be temporarily removed and the machine or equipment is to be energized in order to test or position the machine, the following will apply:

9.1 Clear the machine/equipment of all tools and materials;

9.2 Remove SIMON employees from the machine/equipment area;

9.3 Remove the lockout/tagout device;

9.4 Energize and perform the testing or positioning of the machine/equipment;

9.5 De-energize machine/equipment and reapply the LO/TO devices in accordance with heading 8.0.

10.0 RESTORING EQUIPMENT TO SERVICE

10.1 The authorized SIMON employee will walk the system to ensure all tools and non-essential items have been removed and the machine or equipment components are operationally intact**.**

10.2 Re-install all guards and barriers that were taken off.

10.3 Check the work area to ensure all affected persons have been safely positioned or removed from the area.

10.4 Verify the controls are in neutral/off position.

10.5 Remove the lockout devices.

10.6 Re-energize the machine or equipment.

10.7 Notify affected SIMON employees that servicing or maintenance is completed and the machine or equipment is ready for use.

11.0 MULTIPLE PERSONS

11.1 One of the Authorized Employees must be appointed by the SIMON Supervisor to have the primary responsibility for all of the employees performing a multiple person LO/TO.

11.2 Every SIMON employee servicing the same piece of equipment must be protected via his/her own personal LO/TO lock. This is a required task in order to be protected from accidental machine movement or start-up with his/her own personal lock.

11.3 The last SIMON employee to remove his/her lock is responsible for assuring all guards are properly in place, interlocks set, and the machine is clear for operation.

11.4 The last Authorized Employee, before removing his/her lock is responsible to verbally or visually check the exposure status of all individual employees who were on the LO/TO. They must make sure that all employees are not still performing work.

12.0 EMERGENCY LOCK REMOVAL

12.1 A SIMON employee is never permitted to remove another person's lock from an energy source without the SIMON Supervisor-in-charge's approval. If an employee forgets to remove a LO/TO device and leaves the premises, SIMON supervision or Project Manager will make every effort to contact the authorized employee. If the employee cannot be contacted, another authorized employee and/or SIMON Supervisor will inspect the machinery or equipment and make certain there is no danger in removing the lock. The SIMON Supervisor will remove the lock and complete the Lockout Removal Form, Appendix 20A.

12.2 The absent authorized employee will be notified that his/her lock was removed before he/she returns to work and will sign off on the Lock Removal Form. The Lock Removal Form will be maintained with the job file, plant, or shop files.

13.0 SHIFT OR PERSONNEL CHANGES

13.1 LO/TO through shift changes are only permitted to be done if approved by the SIMON Supervisor.

13.2 When maintenance and servicing extends to the next shift or personnel changes occur on the job, authorized SIMON employees will transfer LO/TO devices.

13.3 At each shift change it is the responsibility of each authorized SIMON employee to go through the lockout procedures to verify the effectiveness of the LO/TO provision before starting work.

14.0 OUTSIDE CONTRACTORS

Outside contractors and subcontractors working on at any SIMON project, plant, shop, and/or company owned property must comply with all aspects of this program.

15.0 PERIODIC INSPECTIONS

15.1 The SIMON Supervisor-in-charge must conduct a periodic inspection of his/her site-specific LO/TO procedures at least annually to ensure that the procedures and requirements of this program are met.

15.2 The inspection will be conducted to correct any deviations or inadequacies identified.

15.3 The SIMON Supervisor must document the inspection using the LO/TO Annual Inspection Form in Appendix 20B.

16.0 TRAINING AND COMMUNICATION

16.1 Training will be conducted by the SIMON Safety Department and/or SIMON Supervisor-in-charge for all employees affected by this program. Training will be documented and maintained in the SIMON Safety Department. Training will be updated annually by the SIMON Supervisor-in-charge, and supplemented periodically through tool-box meetings.

16.2 Retraining is required by the SIMON Supervisor when there is a change in job assignments for individual employees—for example, an employee is transferred to work at one of the HMA plants, when there is a change in machines, a change in the energy control procedures, or a hazard is introduced into the work environment. This training needs to be documented before work begins by the SIMON Supervisor on a standard safety meeting sign-in sheet form.

16.3 Training is provided to ensure the purpose and function of the energy control program is understood by SIMON employees, and the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired.

16.4 Authorized employees are trained in the recognition of applicable hazardous energy sources and the methods and means necessary for energy isolation and control.

16.5 Affected employees will be instructed in the purpose and use of the energy control procedure during orientation and periodic tool box meetings.

16.6 All other employees will be instructed about the prohibition related to attempts to restart or reenergize machine or equipment which are locked out during orientation and periodic tool box meetings.

LOCK REMOVAL FORM	APPENDIX 20A	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

In the event that an employee who applied a lockout device is not available to remove the device, the following procedures must be followed and completed:

Date:_____ Name on Lockout:_____ Lock #: _____

1. **Verification of Employee's Absence from the Facility.**
   The employee's time sheet/card must be checked for:

   Time punched out:_____ Date:_____ Verified by: _____

   If time cards are not used to verify absence, other methods must be employed and documented (check with Supervisor, co-workers; check for presence of employee's vehicle in the parking lot, etc.).

2. **Attempt to Contact Employee Off the Premises.**
   The above named employee was contacted:

   Time:_____ Location Found:_____ Contacted By: _____

   To verify the above lockout conditions.

3. **Lock Removal Authorization.**

   If the person named on the lockout device cannot be located, the following personnel must be contacted to authorize lock removal:

   Supervisor:_____ Time:_____ By: _____

   Area Manager:_____ Time:_____ By: _____

ANNUAL INSPECTION FORM	APPENDIX 20B	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

This report must be completed by the SIMON Supervisor-in-charge or designee (designee must be an authorized employee) who uses the site-specific LO/TO procedure being inspected.

Machine Number, Equipment or Process Identification: _____

Name of Employee(s) involved in utilizing above energy control procedures: _____

Name(s): _____

_____

Check appropriate boxes:

A) ☐ Current energy control procedure adequate to prevent unexpected energization or machine/equipment activation.

B) ☐ Procedure fails to prevent unexpected energization, machine start up or energy build up. List recommendations below to provide adequate employee protection.

C) ☐ Employee responsibilities outlined in the energy control procedure were reviewed with each employee involved in above lockout/tagout sequence.

Recommend changes to present procedure to ensure against accidental machine start up or energy build up: (Complete only if item "B" above is checked)

_____

_____

_____

Energy Control Procedure updated on _____ by _____

Additional recommendations or comments:

_____

_____

_____

Inspection Report Completed By: _____

Date: _____

Reviewed by Supervisor-in-Charge: _____

Date: _____

****This form must be maintained with the Site-Specific procedures by the SIMON Supervisor-in-charge for a period of time up to the next year's annual inspection.****

MOBILE CONSTRUCTION EQUIPMENT, VEHICLES, and CONSTRUCTION VEHICLES	SECTION 21	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 4

1.0 SCOPE

This section covers the minimum criteria as required by OSHA for the safety of SIMON employees in regards to vehicles, construction vehicles and mobile construction equipment. Additionally, this section encompasses the requirements of OSHA 29 CFR 1926 Subpart O- Construction Vehicles and Mechanized Equipment, Subpart W- Rollover Protective Structures, and OSHA 29 CFR 1926.453- Aerial Lifts.

2.0 PURPOSE

The purpose of this section is to provide technical information for SIMON Supervisory personnel to ensure the following: meet the OSHA general requirements as outlined in this program, meet general vehicle safety requirements, meet the construction motor vehicle requirements and material handling equipment criteria as required by OSHA, and company-specific equipment inspection criteria.

3.0 GENERAL REQUIREMENTS FOR CONSTRUCTION VEHICLES AND MOBILE EQUIPMENT

3.1 Access Roadways and Haul Roads. Access roads and haul roads must be constructed and maintained to safely accommodate mobile equipment.

3.2 Authorized Employees. Only authorized employees are permitted to operate mobile construction equipment, vehicles, and construction vehicles. It is not permitted for any employee to operate a piece of mobile construction equipment or construction vehicle without the consent of the SIMON Supervisor. The SIMON Supervisor must ensure that unauthorized employees do not operate/drive equipment and vehicles.

3.3 Backing Speed. There is no set requirement for backing speed, however, do so with caution and at a safe and controlled speed.

3.4 Back-Up Alarm Requirements. All construction vehicles and mobile construction equipment must be equipped with a functional and audible back-up alarm. The alarm must be able to be heard and clearly distinguishable above the noise level of the vehicle or equipment. If the back-up alarm is not working, the equipment must be red-tagged or backed utilizing a full-time spotter.

3.5 Berms. Berms must be installed on haul roads when deemed necessary by the SIMON Supervisor-in-charge or SIMON Safety Department, and must be as high as the highest axle on the job.

3.6 Cribbing and Blocking Equipment for Maintenance. Equipment, vehicles, and parts/pieces on them which are suspended for any reason where any SIMON employee is going to perform work or be in a pinch/crush area must be properly blocked, cribbed or fully lowered to the ground to ensure falling or shifting will not occur that could cause a crush or pinch injury to an employee. A few examples of where this is needed are as follows: loader buckets, scraper bowls, dozer blades, dump bodies on haul trucks, etc. Dump bodies must have a safety locking mechanism to lock the dump body from lowering while maintenance inspection work is being done.

3.7 Drug/Alcohol Use. Employees may not operate equipment, vehicles, or construction vehicles under the influence of alcohol and/or drugs. This also includes prescription drugs and/or over-the-counter drugs that may impair an operator or driver's judgment.

3.8 Eye Contact and Acknowledgement. All SIMON employees are required to make eye contact and get acknowledgement from the operator anytime he/she is crossing the path of mobile equipment or construction vehicles.

3.9 Unauthorized Riders. Only the operator may ride in or on mobile construction equipment, and only in the designated operator's seat. No passengers are permitted on mobile construction equipment. No passengers are permitted to ride on construction vehicles unless the vehicle is equipped with a manufacturer's seat with a seatbelt.

3.10 Fire Extinguisher. All mobile construction equipment and vehicles must be equipped with at least a 10-lb. ABC multipurpose fire extinguisher mounted inside of the cab or in close proximity to the operator station.

3.11 Fueling. When fueling all mobile equipment and vehicles it is the responsibility of the operator and/or the person fueling to ensure that the equipment is shut-off, that the filler nozzle has had contact with the mouth of the tank to unload static discharge, and is 100% certain that no smoking or open flames are in the fueling area.

3.12 Getting On and Off Equipment and Vehicles. Three points of contact must be used at all times to get on and off of equipment and vehicles. In addition, jumping off of equipment or vehicles is not permitted.

3.13 Get Out and Look (G.O.A.L.). Prior to backing any SIMON vehicle and mobile construction equipment that has been parked where site conditions could have changed, it is required that the SIMON employee Get Out And Look prior to backing. By getting out and looking, the driver/operator is getting a 360 degree snapshot of what is in the proximity around the vehicle or equipment. This is also required for the driver/operator if the employee leaves the vehicle or equipment for an extended period of time (e.g.- employee gets out of equipment for a break and gets back in 10 minutes later), meaning that a walk around is required prior to getting in and backing.

3.14 Housekeeping. Housekeeping on the exterior and interior of equipment and vehicles is mandatory. This includes food, containers, clothing, garbage, mud, dirt, dust, etc.

3.15 Pre-Trip Inspections. Daily Pre-Trip Inspections of equipment in use must be done by the SIMON operator and documented on their daily equipment inspection sheet. This inspection sheet must be turned into the shop. Defects that affect the safety of the equipment or vehicle must be corrected prior to its use. Equipment and vehicles must be taken out of service by the operator if there is any safety deficient item which could impact the safe operation of the equipment.

3.16 Load Charts. Mobile equipment and construction vehicles must be operated within the parameters of their operating load charts. Do not exceed load limits.

3.17 Load Securement. All loads must be properly secured before transport. This is the responsibility of the SIMON operator/driver.

3.18 Lunch Boxes, Bottles, Cans, etc. Lunch boxes, bottles, cans, and similar materials must be kept securely fastened in the operator's cab.

3.19 Manufacturer's Requirements. All mobile equipment and construction vehicles must be operated and maintained within the parameters of the manufacturer's requirements and in safe working order. Operators are only permitted to use mobile equipment and vehicles in the manner for which it was designed and intended for. Modifications to mobile equipment shall not be made without written approval from the manufacturer.

3.20 Mirror Adjustments. For optimal visibility, mirrors must be adjusted and checked prior to operation of any SIMON construction vehicle or mobile construction equipment.

3.21 Mud on Public Roads. Contract requirements must be followed that specifically address mud and dirt on public roadways.

3.22 Driver's License. Employees must have a current and valid state driver's license for which he/she is driving a vehicle or construction vehicle.

3.23 Overhead Power Lines. Refer to Section 24 **(OVERHEAD POWER LINES)** of this manual, for specific requirements in regards to working around overhead power lines. Section 24 does not cover crane work.

3.24 Parking Brake. Whenever parked, the parking brake must be set. When parked on an incline, if equipped with wheels, the wheels must be chocked.

3.25 Safety Tire Rack, Cage, or Equivalent. When inflating, mounting, or dismounting tires installed on split rims or rims equipped with locking rings or similar devices, a safety tire rack, cage or equivalent protection must be used by SIMON employees.

3.26 Scan Mirrors While Backing. Mirrors must be continuously scanned by the operator while backing to provide for optimal visibility.

3.27 Seatbelts. Seatbelts must be worn when the mobile equipment or construction vehicle is turned on and not parked. The only exception is when operating mobile equipment without ROPS is not equipped with a seatbelt (e.g. - paver, grad all, shuttle buggy, etc.). Otherwise, seatbelts are required 100% of the time.

3.28 Speed Limits. The driver/operator must abide by posted speed limits and ensure that they maintain proper following distances between vehicles at all times.

3.29 Surcharge Loading the Ground. When working around excavations, cut/fill areas, or any area where the earth has a potential to give way because of surcharge loading, the SIMON Supervisor-in-charge must ensure that mobile equipment and construction vehicles are maintaining a safe distance from these areas that could pose the threat of having an incident (e.g.- mobile construction equipment rolling into an excavation).

3.30 Swing Radius Hazard. Employees must stay clear of equipment that has a counterweight swing hazard (e.g.- CAT 330 Track Excavator) and stay out of pinch areas where he/she could be crushed between a counterweight and another stationary object (e.g.- caught between a counterweight and another piece of moving equipment).

3.31 Using a Spotter to Back-Up. Due to blind spots, the high frequency of backing with specific operations (e.g. - triaxles backing into a paver), and the hazardous nature of backing, a spotter may be required to assist a construction vehicle and/or mobile equipment in backing. A spotter will be required when deemed necessary by the SIMON Supervisor-in-charge or driver/operator. In addition, if a back-up alarm is not functioning, a spotter is required 100% of the time.

3.32 Window and Mirror Visibility. Windows and mirrors must be maintained in a clean and clear condition for optimal visibility, and without damage or cracks that restrict visibility. This includes cleaning on the inside cab glass and outside cab glass and mirrors on the inside and outside.

3.33 Violations. Drivers/Operators must report a traffic citation/violation while operating any company vehicle to their Supervisor in a timely manner.

3.34 Workers on Foot. SIMON employees on the ground must stay clear of moving construction vehicles and mobile equipment, and always position themselves to stay clear of the struck by/caught between hazard.

4.0 CONSTRUCTION VEHICLES

4.1 A **Construction Vehicle** is any motor vehicle that operates off-highway or off-roadway, or in an area not open to public transportation (e.g. - dead lane of a work zone on Interstate 80).

4.2 General Requirements.

4.2.1 Brakes. All constructions vehicle must have a service brake system, parking brake system, and an emergency brake system.

4.2.2 Brake Lights. Vehicles must be equipped with functional brake lights.

4.2.3 Headlights and Taillights. Head lights and tail lights are required for night operations, and when light conditions warrant as determined by the SIMON Supervisor-in-charge.

4.2.4 Horn. Vehicles must be equipped with an audible horn.

4.2.5 ROPS- Roll Over Protective Structures. ROPS must be in place on all construction vehicles manufactured with a ROPS system.

5.0 MOBILE EQUIPMENT

5.1 Service Braking. All earthmoving equipment must have a service braking system capable of stopping and holding while fully loaded as specified by the manufacturer.

5.2 ROPS- Roll Over Protective Structures. ROPS must be in place on all mobile construction equipment manufactured with a ROPS system, and all rollers must be equipped with ROPS regardless of whether or not they were manufactured with or without ROPS.

6.0 AERIAL LIFTS

6.1 Training and Operator's Card. SIMON employees must successfully complete the aerial lift qualification course prior to operating an aerial lift. The Aerial lift qualification training course is addressed in Section 30 (**SAFETY AND HEALTH TRAINING**) of this manual.

6.2 Lift Controls. Lift controls must be tested each day by the qualified operator prior to use to determine that such controls are in safe working condition. Tests shall be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition.

6.3 Feet on Floor of Basket. Employees shall always stand firmly on the floor of the basket, and shall not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.

7.0 FORKLIFTS

7.1 Training and Operator's Card. SIMON employees must successfully complete an operator's forklift certification course prior to operating a forklift. The course must either be for a rough-terrain forklift (e.g. - CAT Telehandler), or for an industrial forklift (e.g. - forklift in the shop). These courses are typically scheduled by the SIMON Safety Department during the winter training season, and as needed throughout the year. The SIMON employee will be issued an operator's card upon successfully completing the certification course.

7.1.1 Instructors. This course will be taught by a qualified instructor(s). This course is taught by an outside vendor who has the expertise and knowledge about all aspects of the forklift. In addition, the course may be taught internally by a SIMON qualified instructor who has the skills and expertise to teach the course. A SIMON instructor must have taken a train-the-trainer course and successfully pass prior to teaching a course at SIMON.

7.1.2 Training. Training is inclusive of formal classroom instruction, practical training which includes seat-time and hands-on operation of the fork lift, and operator evaluation in the workplace as well as during the training. Training will include instruction on, but not limited to: load capacity, manufacturer and operator instructions, distances, refueling, ramps, visibility, blind spots, and balancer and counterbalances.

7.2 Trailer Chocks and Dock Plates. When working at a loading dock facility, the operator must verify trailer chocks, supports, and dock plates prior to loading/unloading.

7.3 Retraining/Re-Certification. Refresher training will be conducted as follows:

7.3.1 When an operator has been observed operating the forklift in an unsafe manner.

7.3.2 When the operator has been involved in an accident or near-miss incident.

7.3.3 When the operator is assigned to drive a different type of forklift (e.g. - shop forklift vs. rough-terrain forklift).

7.3.4 When a condition in SIMON' work environment could affect the safe operation of the forklift.

7.3.5 Re-Certification will be completed every 3 years.

OFFICE REQUIREMENTS (JOB-FIELD-PLANT-SHOP)	SECTION 22	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

1.0 SCOPE

This section provides clear general safety requirements for job, field, plant, and shop offices. This section also encompasses multiple subparts of the OSHA 1926 construction regulations.

2.0 PURPOSE

The purpose of this section is to provide clear general safety criteria for offices (job, field, plant, and shop) that SIMON Supervisory personnel are responsible to ensure is implemented whether it is in their work area or on their job.

3.0 GENERAL REQUIREMENTS

3.1 Emergency Numbers. Emergency numbers (e.g. - ambulance, hospital, 911, etc.) must be posted near telephones in offices.

3.2 Electrical. All receptacle outlets must be ground fault circuit interrupter (GFCI) protected within 6 feet of running water.

3.3 Exit Doors. Exit doors must be clearly marked as "EXIT." Exit doors are not permitted to be locked during work hours. If exit doors must be locked during off-hours, each door must have a sign stating the following: DOOR MUST REMAIN UNLOCKED ANYTIME THIS OFFICE, BUILDING, or TRAILER IS OCCUPIED.

3.4 Fire Extinguishers. Each office must be equipped with at least one 20-lb. ABC multi-purpose fire extinguisher. The fire extinguisher(s) must be mounted on the wall, have a clearly legible sign indicating "FIRE EXTINGUISHER", and have a clear access way to the fire extinguisher.

3.5 First-Aid Kit. Each office must be equipped with a first-aid kit. The first-aid kid must be inspected weekly by the SIMON Supervisor- in-charge or designee, and re-stocked as necessary.

3.6 Housekeeping. Job offices must be kept in a neat, orderly, and clean manner. This means that floors must be periodically cleaned and indoor restrooms must be periodically cleaned at a time-frame determined by the SIMON Supervisor.

3.7 OSHA 5-in-1 Poster. The OSHA 5-in-1 poster must be posted in a conspicuous location either in the office or outside of the office on the job postings board.

3.8 Smoking. Smoking is prohibited in any office.

3.9 Steps to Job-Trailers. Job trailers must be equipped with a landing at the exit door(s), skid-resistant steps (or coated with a skid resistant material) up to the landing, a platform that extends beyond the swing of the door, and guardrails on the platform.

OSHA/MSHA INSPECTIONS	SECTION 23	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 3

1.0 SCOPE

This section provides pertinent information for SIMON Supervisory personnel so they can better understand the OSHA/MSHA inspection process. This program provides guidelines to be followed by SIMON Supervisors so they can appropriately interact with an OSHA inspector(s) when he/she arrives on-site, during the OSHA inspection process, when a deficiency is noted, and for the OSHA inspection wrap-up.

2.0 PURPOSE

The purpose of this program is to provide technical information to be to be used by SIMON Supervisory personnel for an OSHA inspection on any SIMON job-site, plant, and/or company-owned property. This information is to be used by SIMON Supervisory personnel to effectively interact with OSHA personnel, and to effectively document the OSHA inspection.

3.0 SIMON SUPERVISOR TRAINING

All SIMON Supervisory personnel will receive training on the OSHA/MSHA inspection process. It is our requirement that all job/pit/quarry managers and Foreman take part in the inspection along with the regional Safety Manager and Corporate Safety Director if available.

4.0 REASONS TO BE INSPECTED BY OSHA/MSHA

A federal OSHA/MSHA inspector may show up at any SIMON work-site for a number of reasons, but in general there are six reasons for an inspection, and they are as follows:

4.1 Imminent Danger. A condition of employment that creates a danger that could result in immediate death or physical harm. This means that an OSHA/MSHA inspector could be driving by a SIMON job, pit or quarry and stops to perform an inspection because he/she sees an imminent danger situation (e.g. - employees in an unprotected trench).

4.2 Catastrophes and Fatal Accidents. One fatality or incident resulting in three or more employees hospitalized. If SIMON has three or more employees hospitalized or an employee fatally injured as a result of an accident, then the SIMON Corporate Safety Director is responsible to call the regional OSHA office within eight hours to report the accident. OSHA will then come to the work-site to conduct an accident investigation inspection.

4.3 Employee Complaints. An employee, subcontractor employee, passerby, etc., notifies OSHA/MSHA (phone/written) about a perceived hazard or hazards, which threaten physical harm to an employee. Anyone has the right to file an anonymous complaint with OSHA/MSHA about a perceived safety hazard in SIMON' work environment. OSHA/MSHA is required to follow-up with a complaint investigation and inspection.

4.4 Programmed Inspections. OSHA/MSHA randomly selects active SIMON construction projects or work operations for inspections. In general, this is typically the type of inspection SIMON receives.

4.5 Follow-Up Inspections. OSHA/MSHA returns to a project to complete an inspection or to verify that violations were corrected.

4.6 Special Emphasis Inspection. OSHA/MSHA selects specific high-hazard areas (e.g. - fall hazards, silica, trenches, etc.) and drives around looking for this type of work. When the inspector finds this type of work activity he/she stops and conducts an inspection.

5.0 INSPECTOR'S ARRIVAL ON-SITE

When the OSHA/MSHA inspector arrives on the SIMON site the following steps must be taken by the SIMON Supervisor-in-charge:

5.1 Take the inspector to the job office, plant office, or truck where SIMON' business is being directed. The reason for this is for the inspector's own general safety. Any OSHA/MSHA inspector is a visitor, and must be escorted by the SIMON Supervisor-in-charge. In addition, SIMON wants to know why the inspector is on-site before the person begins walking around in the work environment. Kindly ask the inspector to wait while you call the Safety Manager and job, pit, or quarry manager to let them know that an inspector is on site.

5.2 Request the OSHA inspector's credentials. The inspector is required to show his/her federal badge with a photo identification (similar to a driver's license).

5.3 Ask the inspector why SIMON is being inspected. It will be one of the reasons in heading 4.0.

5.4 Contact the Safety Department immediately. Explain to the Safety Department representative what is occurring.

5.5 At this point, the Safety Department representative will have a discussion with the OSHA/MSHA inspector, and a request will be made to the OSHA/MSHA inspector to wait until the Safety Department representative shows up on-site. In general, the inspector will wait up to an hour for a Safety Department representative to arrive. If the inspector will not wait, nor can the Safety Department representative arrive within a reasonable time, then the inspection will need to occur without a safety representative.

5.6 Prior to the commencement of the inspection, the Supervisor-in-charge must notify all employees on the job that there is an OSHA/MSHA inspector on-site and that the inspection is going to occur.

5.7 The inspection cannot begin until the Supervisor-in-charge is ready for the inspection; refer to the next heading, 6.0.

6.0 INSPECTION PROCESS

Prior to the commencement of and during any OSHA/MSHA inspection, the Supervisor-in-charge must prepare to accompany the OSHA/MSHA inspector during the inspection. The SIMON Supervisor-in-charge is required to accompany the OSHA/MSHA inspector during the inspection. If a SIMON Safety Department representative is unable to attend, then the following general steps need to be taken before and during the inspection by the SIMON Supervisor-in-charge.

6.1 OSHA Inspection Checklist. Access the OSHA/MSHA Inspection Checklist in Appendix 23A of this program, and take it with you during the inspection. This form is designed to walk the SIMON Supervisor through the inspection process. This form must be completed in detail during the OSHA/MSHA inspection. If at all possible, the SIMON Safety Department representative will walk you through the OSHA/MSHA Inspection Checklist prior to the inspection.

6.2 Camera, Notebook, Video Camera. Take every available means you have on the job to document the OSHA/MSHA inspection process. This means that if the OSHA/MSHA inspector takes a picture of an alleged violation, this means that you take a picture of the same thing. If the OSHA/MSHA inspector draws a sketch of an alleged violation, this means that you draw a sketch of an alleged violation.

6.3 Employee Interviews. The OSHA/MSHA inspector has the right to conduct a confidential employee interview with the person of his/her choice. The employee has the right to participate or refuse. Document who was interviewed and what was asked by the inspector after the inspection is over and include it with the OSHA/MSHA Inspection Checklist.

6.4 Document Requests by the OSHA Inspector. Contact the SIMON Safety Department to discuss document requests prior to giving the OSHA/MSHA inspector permission to review any documents. This will be decided on by the SIMON Safety Department.

6.5 Answering OSHA's Questions. The following are general tips to answering an OSHA/MSHA inspector's questions for all employees.

6.5.1 Be courteous, professional and cooperative, but do not get too friendly. Remember, the OSHA/MSHA inspector is a guest.

6.5.2 Answer truthfully and accurately only on questions you have the expertise and authority to answer.

6.5.3 Do not answer questions that you do not understand or do not have the necessary facts to answer.

6.5.4 Direct the OSHA/MSHA inspector to a designated company representative when unsure how to properly respond.

6.5.5 Do not admit to guilt to any alleged violation. If there is an alleged violation, this will be later determined by SIMON management.

7.0 INSPECTION WRAP-UP

Once the OSHA inspector states that the inspection is complete, and if a SIMON Safety Department representative was unable to attend the inspection, then the SIMON Supervisor-in-charge must do the following:

7.1 Ask the inspector if he/she is "closing out" the inspection. This is a simple yes or no.

7.2 Request a list of alleged violations and write them down.

7.3 Ask the inspector if he/she will conduct a follow-up inspection visit.

7.4 Call the SIMON Safety Department immediately to discuss the inspection.

7.5 Complete the OSHA/MSHA inspection checklist and submit it to the SIMON Safety Department within 24 hours, and this includes drawings, sketches, pictures, and videos taken by the Supervisor-in-charge.

OSHA INSPECTION CHECKLIST	APPENDIX 23A	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 3

WHEN OSHA/MSHA ARRIVE

- ❑ Call Home Office and ask OSHA/MSHA to wait until a company representative arrives.
- ❑ **General information**
  - ❑ Date:_____
  - ❑ Time:_____
  - ❑ Job location: _____
  - ❑ Supervisor-in-charge: _____
  - ❑ Person completing this checklist: _____
- ❑ **First steps**
  - ❑ Request credentials and a business card.
    - ❑ Name: _____
    - ❑ Badge number:_____
  - ❑ Why is OSHA/MSHA on the jobsite?
    - ❑ General schedule inspection
    - ❑ Emphasis inspection
    - ❑ Employee complaint
    - ❑ Imminent danger
    - ❑ Fatality
    - ❑ Follow-up
  - ❑ Is this a **focused** inspection? (circle one) Y / N
- ❑ **Records and Documents**

  Do not provide copies of any Company Safety records without authorization. Do not give OSHA/MSHA your internal safety inspection records (e.g., Housekeeping reports, etc.).
  - ❑ Did OSHA review Company Safety Records? (circle one) Y / N
    - ❑ Safety Program
    - ❑ OSHA 300 Log
    - ❑ HazCom Program
    - ❑ Other: _____
- ❑ **Prior to jobsite inspection**
  - ❑ What equipment will OSHA use?
    - ❑ Camera

- ❑ Video camera. (Ask OSHA/MSHA to turn off video cameras while speaking. Remember the video camera records audio.)
- ❑ Other: _____

❑ What equipment will you use?

- ❑ Note pad/pen
- ❑ Camera
- ❑ Video camera
- ❑ Tape recorder
- ❑ Tape measure
- ❑ Other: _____

❑ Does everyone have appropriate safety equipment?

- ❑ Hard hat
- ❑ Safety glasses
- ❑ Work boots
- ❑ Vest
- ❑ Other: _____

JOBSITE INSPECTION

Note: Do not volunteer information, admit guilt, or conduct demonstrations.

❑ **Walking the jobsite.** Who accompanied OSHA/MSHA on the jobsite inspection? (Remember to stay with the Inspector at all times!)

- ❑ Name and title: _____
- ❑ Name and title: _____

❑ **Alleged violations:**

_____

_____

_____

_____

❑ Measurements/pictures/video and other physical evidence. Take identical measurements/pictures/videos as OSHA. Correct obvious violations immediately.

❑ **Areas of the jobsite visited:**

_____

_____

_____

_____

- ❑ Were our employees working in the areas? Y / N

If yes, who?_____

_____

_____

_____

- ❑ **Inspection of subcontractors.** Identify subcontractors and their representatives. Document any questions asked by OSHA.
- ❑ **Employee Interviews.** Do not stop or interrupt work for interviews. Document the following:

  Who was interviewed?_____

  _____

  _____

  _____

  What was discussed?_____

  _____

  _____

  _____

- ❑ **Answering OSHA/MSHA questions**
  - ❑ Be courteous, professional and cooperative, but do not get too friendly.
  - ❑ Answer truthfully and accurately only questions you have the expertise and authority to answer.
  - ❑ Do not answer questions that you do not understand or do not have the necessary facts to answer.
  - ❑ Direct OSHA/MSHA to the designated company representative when unsure how to properly respond.

BEFORE OSHA/MSHA LEAVE

- ❑ Was a closing conference held? Y / N
- ❑ Request a list of alleged violations.
- ❑ Do not make admissions, argue your case, or agree to any corrective measures.
- ❑ Request a copy of all OSHA's physical evidence (e.g. – pictures, video, measurements, etc.)
- ❑ Will OSHA/MSHA conduct a follow-up visit? Y / N
- ❑ Time of departure: _____
- ❑ Call home office immediately after OSHA'S/MSHA departure.
- ❑ Fax/send a copy of this completed checklist immediately to home office.

OVERHEAD POWER LINES	SECTION 24	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 3

1.0 SCOPE

This program sets the minimum criteria for SIMON employees working in proximity to overhead high voltage power lines. This program applies to any piece of mobile equipment, truck, vehicle, aerial lift, ladder work, or any work which may place SIMON employees in proximity to overhead power lines. This program does not apply to any work associated with cranes; refer to Section 10 (**CRANES**) of this manual for power line requirements associated with cranes. The program also sets forth the minimum criteria for utilizing hot sticks by SIMON employees.

2.0 PURPOSE

The purpose of this program is to provide technical information to SIMON Supervisory personnel so that they can safely and effectively work in proximity to overhead power lines, and includes the use of hot sticks.

3.0 DEFINITIONS

Dangerous Proximity: A distance closer than the safe clearance that OSHA requires to an overhead power line, unless the line is verified to be de-energized and visibly grounded to the neutral.

De-energized Overhead Power Line: The overhead power line has been physically verified as de-energized by a power company representative and is visibly grounded to the neutral. An example of verification is an executed work order slip indicating that the line in question is de-energized.

Hot Stick: An electrically insulated device, which looks like a clothes line pole, and is used by SIMON crews to prop-up residential home service electrical and communications lines for tight work areas.

Overhead Power Line: Any overhead electrical power line.

Safe Distance: The minimum working clearance between the line and any equipment, truck, crane, etc. is 10 feet for lines rated 50 kilovolts or less. For lines rated greater than 50 kilovolts the minimum clearance is 10 feet plus 0.4 inches for every 1 kilovolt over 50 kilovolts (e.g.- 350 kilovolts requires 20 feet of clearance). The chart below will aid in knowing what the safe distances are:

NO.	VOLTAGE IN KILOVOLTS	SAFE CLEARANCE DISTANCE (FEET)
1.	≤ 50	10 FEET
2.	100	12 FEET
3.	200	15 FEET
4.	350	20 FEET
5.	500	25 FEET
6.	750	35 FEET

10-Feet Rule: This is a common term in the construction industry, which means that you must maintain 10 feet of clearance for any overhead power lines rated 50 kilovolts or less.

4.0 GENERAL REQUIREMENTS

4.1 Pre-Work Objective. Any time SIMON will be doing work in proximity to an overhead power line, it will always be the goal if at all possible to have an overhead power line de-energized prior to beginning work. This is the responsibility of the most senior SIMON Supervisor-in-charge or designee.

4.2 Equipment Warning Labels. All cranes must have clearly legible warning decals on the outside and visible to employees that reads: **"DANGER: UNLAWFUL TO OPERATE ANY PART OF THIS EQUIPMENT WITHIN 10 FEET OF HIGH VOLTAGE OVERHEAD POWER LINES.**

4.3 Verification of Line Voltage. Prior to commencing work in proximity to lines greater than or equal to 50kV, the SIMON Supervisor is required to verify the voltage by contacting the power company.

4.4 Clearance Distances to Overhead Power Lines. The SIMON Supervisor-in-charge of the work operation and all SIMON employees working in proximity to an overhead power line must ensure they will not operate equipment and/or vehicles within dangerous proximity to any live overhead power line as defined by this program. The minimum safe clearance distances required by OSHA are in heading 3.0.

4.5 De-energized Overhead Power Lines. SIMON employees may operate inside of the safe distances defined in heading 3.0 if the line is physically verified as de-energized by a power company representative and is visibly grounded to the neutral.

4.6 Insulating Barriers. It is permissible to work inside of the safe distances to overhead power lines when insulating barriers have been installed and permission along with work directions (e.g.- safe work practices working next to insulators) have been provided by the power company. This must be documented and is the responsibility of SIMON Supervisor-in-charge.

4.7 Non-Conductive Ladders. Ladders must be of a non-metal type (non-conductive wood or fiberglass) when working in proximity to overhead power lines; for example, aluminum ladders are not permitted while installing sewer lines in a city street while working directly below an overhead power line, where if raised could contact a power line.

4.8 Tag-Lines and Rigging. Careful thought and planning must be given to rigging and tag lines prior to working in proximity to an overhead power line. Rigging and tag-lines should be of the non-conductive type—for example, synthetic slings vs. wire rope slings. Rigging and tag-line consideration is the responsibility of the most senior SIMON Supervisor-in-charge. Polypropylene is the best electrically-insulated synthetic material.

4.9 Spotter. The SIMON Supervisor-in-charge must decide when to use a spotter while working in proximity to overhead power lines.

5.0 HOT STICKS

5.1 Training. Employees must be given hot stick training by the SIMON Safety Department prior to use.

5.2 Use. Hot sticks may only be used for residential house services. This includes house electric, house cable, and house telephone.

5.3 Weather Restrictions. Hot sticks may not be used anytime it is raining/icing/snowing/etc.

5.4 Field Inspection. Hot sticks must be visually inspected by trained employees before each use. Any deficiency or visual defect must be reported directly to the SIMON Supervisor. The hot stick must be immediately taken out of service. In turn, the SIMON Supervisor will notify the SIMON Safety Department. Repairs are not permitted on hot sticks. The deficient hot sticks will be sent to the manufacturer for repairs, or must be discarded.

5.5 Manufacturer's Re-Certification. Hot sticks must be sent back for periodic re-inspection according to the manufacturer's timeline criteria (e.g. - typically every 2 years), and when any deficiency exists.

6.0 CONTACT WITH AN OVERHEAD POWER LINE

If contact is made with an overhead power line where the line remains in contact with the machine, equipment, etc., then the following steps must be taken.

6.1 Staying in the Cab. The operator or driver must stay in the seat of his/her cab until the power company has verified the de-energized power line. The employee(s) is permitted to exit only if the equipment or vehicle catches on fire. If a fire occurs, the employee must jump free of the equipment/vehicle, and shuffle with both feet together until he/she is clear. Jumping free means that you cannot touch the equipment/vehicle and the ground at the same time.

6.2 Employees in the Area. Employees working in the general vicinity must clear the area. Under no circumstance is any employee permitted to go in and assist an injured person or anywhere near the downed wire.

6.3 Supervisor's Responsibilities. The SIMON Supervisor must contact the 911 system and power company immediately. In addition, the Supervisor and appointed personnel must keep all SIMON employees clear of the downed wire area until the power company has verified that the line has been de-energized.

PERSONAL PROTECTIVE EQUIPMENT (PPE)	SECTION 25	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 4

1.0 SCOPE

This section sets the minimum requirements for wearing specific types of Personal Protective Equipment (PPE) for every SIMON employee while performing any type of work operation. This program does not cover high visibility clothing, respiratory protection, lead work, and fall protection. Respectively, each of these items has their own section within this manual. Additionally this section encompasses the requirements of OSHA 1926.28, Subpart C and Subpart E- PPE.

2.0 PURPOSE

The purpose of this program is to provide PPE requirements to SIMON Supervisory personnel and all employees so that they will know when PPE is required, when it is recommended, and when it is not required.

3.0 GENERAL REQUIREMENTS

3.1 Work Clothing Requirements. All employees at a minimum must wear long pants, t-shirts with short sleeves (3" minimum), and hard-soled safety-toed work boots (6" minimum). Tank-tops, muscle shirts, and shirts without sleeves are not permitted. Rings and other jewelry worn on the hands will not be permitted while working on jobsites, plants, or quarries.

3.2 Hard Hat. All employees must wear a SIMON hard hat while working; however, employees are permitted to work without a hard hat while operating a vehicle, truck, in a field office, or inside of an enclosed cab (inside of cab glass) on a piece of equipment. Hard hats must be replaced when determined to be deficient by the employee, the Supervisor-in-charge, and/or the SIMON Safety Department.

3.3 100% Eye Protection. All employees, at a minimum, must wear ANSI Z87 rated safety glasses with ANSI Z87 rated side shields 100% of the time while working. Employees are permitted to work without 100% eye protection while operating a vehicle, truck, or inside of an enclosed cab (inside of cab glass) on a piece of equipment. Specific circumstances, such as sighting through a transit, may require employees to momentarily take off the eye protection while doing so, and this is acceptable.

3.4 Prescription Safety Glasses. Simon employees can use their vision insurance to purchase prescription safety glasses.

3.5 Loose Fitting and Baggy Clothing, and Long Hair. Loose fitting and baggy clothing, and long hair is not permitted by any SIMON employee where they may be susceptible to getting caught in or sucked into moving parts machinery, pulleys, etc. This includes shirt-tails, coat-tails, neck-ties, hanging jewelry, etc. Long hair must be pulled up or pulled back and secured out of the way.

3.6 SIMON Supervisor Responsibility. It is the responsibility of the SIMON Supervisor-in-charge to ensure that all employees under his/her direction are wearing PPE as required in this program. Also, it is the responsibility of the SIMON Supervisor to ensure that each employee has proper training on how to wear PPE required in this program.

3.7 Employee-Owned PPE. The only PPE permitted to be owned by SIMON personnel is safety glasses with side shields that must be ANSI Z87 compliant, and the second is welding shields. In all cases, SIMON Supervisory personnel are required to ensure the adequacy of this PPE (meaning that it is the correct type), the maintenance of this PPE, and its sanitary condition.

3.8 Employee Training. All PPE training will be documented with the employee name, date(s) of training, and the specific type of PPE trained on. PPE training will be completed in a number of ways beginning with employee orientation where a general overview of PPE requirements will be reviewed. PPE training will also be conducted by SIMON Supervisors throughout the calendar year by means of tool-box meetings, supplemented during the winter training months, and by the SIMON Safety Department as required.

Employee retraining will be conducted when the work environment changes, making the preliminary training or earlier training obsolete, when the type of PPE has changed (i.e.- new type of respirator or body harness), or when an employee(s) demonstrates lack of proper use, lack of use, or insufficient skill or understanding of the PPE.

3.9 Fitting PPE to Employee. Respirators must be fitted to each affected employee; refer to Section 29 (**RESPIRATORY PROTECTION)**. All other PPE must be fitted to each affected employee. This is the responsibility of the SIMON Supervisor—for example, making sure the employee has the appropriate size Class II traffic vest on.

3.10 Defective and Damaged PPE. Defective and damaged PPE may not be used at any time by any employee.

3.11 Sanitary and Reliable Condition. All PPE must be provided to employees in a clean and sanitary condition. In addition, employees must use and maintain PPE in a clean and sanitary condition.

3.12 PPE Hazard Assessments. All PPE identified in this program is appropriate and adequate for the type of work activities that SIMON personnel will be involved in. Where the SIMON Supervisor, or the SIMON Safety Department makes a determination where a particular type of PPE may not be adequate for any SIMON job, a formal documented hazard assessment will be conducted by the SIMON Safety Department to determine adequacy. If a change needs to be made as determined by the SIMON Safety Department, this entire PPE program (Section25) will be amended where necessary and all personnel trained, and it will be documented accordingly.

3.13 Visitors, Subcontractors, Etc. All visitors to any SIMON job-site, plant, and/or property must adhere to all requirements of this program. It is the responsibility of the SIMON Supervisor-in-charge to ensure that visitors meet the requirements of this program.

4.0 FACE PROTECTION

4.1 Respirators. Refer to Section 29 (**RESPIRATORY PROTECTION**) of this manual for all respiratory protection requirements.

4.2 Splash/impact goggles

At a minimum, splash/impact goggles must be worn when employees are in the vicinity of, or are handling caustics, acids, and any other chemicals where spill or splash hazards exist.

A face-shield may be required in conjunction with the splash/impact goggles. This will be determined on a case-by-case basis by the SIMON Safety Department.

4.3 Face shields

A full-face shield must be worn to provide face protection from flying material, particles, liquids, or chemical splashes. Face shields regardless of their rating are considered only to be secondary eye protection and must be used in conjunction with 100% eye protection and/or impact resistant splash goggles. Face shields are either mesh or plastic. Plastic shield must always be worn anytime there is a splash hazard.

Face shields are required anytime an employee's head or face is subject to flying material, particles, liquids, or chemical splashes. Face shields are required at all times while performing the following operations:

1. Grinding or chipping any material	6. Cut-off saw or Chain Saw
2. Power wire brush use	7. Masonry saw.
3. Handling acids and caustics	8. Jackhammering, Chipping Hammer
4. Handling hot liquid asphalt or liquids with elevated temperatures that could cause burns.	9. Using a blow pipe
5. Using powder-actuated tools	10. Pressure washing

*****This list above is the minimum requirement. Specific additional work operations will be evaluated by the Area Manager and the SIMON Safety Department to determine when an employee is required to wear a face shield.***

5.0 BURNING/WELDING

All eye and face protection worn for welding and cutting will be used in combination with a hard hat.

5.1 Welding. A complete welding hood for eye and face protection with a proper tinted lens must be used. This must be attached to a SIMON hard hat.

5.2 Burning. At a minimum, burning goggles with the proper tinted lens will be worn while performing acetylene burning/cutting, or any torch cutting or torch heating.

5.3 Helpers. Helpers must wear UV-protective safety glasses at a minimum.

6.0 GLOVES

6.1 Standard Work Gloves. Standard work gloves must be worn by all SIMON employees when handling rough, sharp edged, abrasive material, or where the work subjects the hands to lacerations, abrasions, punctures, burns, or bruises.

6.2 Anti-Vibration Gloves. Anti-vibration gloves must be worn anytime a SIMON employee utilizes a jack-hammer, rivet-buster, chipping gun, or similar tool that subjects the hands to continuous and repeated vibration.

6.3 Butyl Rubber or Nitrile Rubber Gloves. Butyl or nitrile rubber gloves will be worn by SIMON employees when working with acids, caustics, corrosives, or where chemicals have the potential to be absorbed through the skin. The type and style of glove will be determined by the SIMON Safety Department.

7.0 HEARING PROTECTION

Hearing Protection is required in the form of ear plugs, ear muffs, or a combination of both when noise levels exceed the OSHA allowable limits. Refer to the table below as a reference for when hearing protection is required.

NO.	NOISE LEVEL (DECIBELS)	DURATION PERMITTED WITHOUT HEARING PROTECTION	EXAMPLE OF EQUIPMENT (these are only examples to be used as reference points by SIMON Supervisors)
1.	$\leq$ 90	Entire work shift	Air compressor, Hammer, Closed Cab Mobile Equipment, Rollers (compactors)
2.	92	6 hours	Welding, Using a Concrete Vibrator for a pour
3.	95	4 hours	Masonry Saw, Hydraulic Breakers, Jumping Jack
4.	97	3 hours	Circular Saw
5.	100	2 hours	Working in close proximity to a large dozer
6.	102	1.5 hours	Air Grinder, Crane with uninsulated cab
7.	105	0 minutes	Chain Saw, Impact Wrench, Cut-Off Saw, Chipping Concrete, etc.
8.	110	0 minutes	Impact Wrench, Pneumatic Breakers, HO-RAM, Sand Blasting, etc.
9.	115	0 minutes	Jackhammer, Pile Driving, Blow Pipe on Compressor, Air Track Drill, Concrete Road Saw, Vermeer Saw, etc.

The SIMON requirement is that if you are going to be working in an area where you have to holler, scream, significantly raise your voice, or yell to communicate to an employee next to you then you must wear hearing protection while working in that area. The rule of thumb for employees using tools is that you should be utilizing hearing protection any time you are operating a gas, electric, or air-powered tool.

In addition, any employee using a tool or similar tool with respect to noise in rows 7, 8, or 9 above is then required to wear hearing protection 100% of the time.

8.0 OTHER PROTECTION REQUIREMENTS

8.1 Leggings/chaps. Leggings/chaps designed for chain saw use must be worn by SIMON employees operating a chain saw.

8.2 Wet concrete. Employees are required to wear concrete boots and chemical resistant protective gloves while working with or standing in wet concrete.

8.3 Hot liquid work (e.g. - hot liquid asphalt). Employees must wear a green welding jacket covering the arms and upper body, or a long-sleeve cotton shirt, or similar protective clothing, a face shield and 100% eye protection, and work gloves anytime he/she is working with hot asphalt liquid or liquids with elevated temperatures under pressure that could cause burns.

8.4 Jewelry. Metal Rings, Watches, Bracelets and other jewelry worn on the arms and hands will not be permitted while working at jobsites, shops, plants, or quarries.

1.0 SCOPE

This section covers the minimum criteria as required by OSHA for the safety of SIMON employees during pile driving operations. Additionally, this section encompasses the requirements of OSHA 29 CFR 1926.603, Subpart O - Construction Vehicles and Mechanized Equipment and other requirements as specified in OSHA 29 CFR 1926.

2.0 PURPOSE

The purpose of this program is to provide technical information for SIMON Supervisory personnel to ensure the following: meet the OSHA general requirements as outlined in this program, meet the requirements of this program as they relate directly to other subparts of the OSHA 29 CFR 1926 requirements and company specific requirements herein.

3.0 GENERAL REQUIREMENTS

3.1 Battered Piles. When conducting battered pile operations, the leads must be in a stabilized position.

3.2 Excavation Work. The SIMON Supervisor-in-charge must ensure that all criteria in Section 12 **(EXCAVATION AND TRENCHING)** of this manual are met.

3.3 Exposure underneath Hammer and Leads. A blocking device, capable of supporting the weight of the hammer, must be provided for placement in the leads under the hammer at all times while employees are working under the hammer.

3.4 Guiding Sheet Piles. When guiding sheet piling, employees must guide piles by working out of an articulating boom lift, ladder, and/or using stirrups with 100% fall protection.

3.5 Lagging and Tie-Back Operations. Digging for lagging operations shall be done in accordance with the engineered drawings and specifications. The SIMON Supervisor must ensure that over-digging (no more than 5 feet of vertical lift) for lagging does not occur. Burn-Outs for wales/tie-backs shall be done only in accordance with engineered drawings and specifications. Backfill must be completed sufficiently according the engineered drawings and specifications.

3.6 Pile Alignment. A driving head or bonnet must be provided to bell the head of the pile and hold it true in the leads.

3.7 Pile Clearance. All employees must be kept clear of the pile when it is being hoisted into the leads.

3.8 Rigging. The SIMON Supervisor in-charge must ensure that all criteria in Section 28 **(RIGGING)** of this manual are met.

3.9 Sheave Guard on Crane. Sheave guards must be in place on the crane to prevent the load line(s) from jumping out of the sheave.

3.10 Torch Cutting Driven Piles. Pile driving operations must be suspended in proximity to areas where the tops of driven piles are being cut off. The distance for suspending operations is twice the distance of the longest pile being burned off. If the pile being burned off is not secured in the leads, sufficient tabs shall be left so the pile remains upright. Verification then can be made to push the pile over.

3.11 Underground Utilities. The SIMON Supervisor-in-charge must ensure that all criteria in Section 35 **(UNDERGROUND UTILITIES)** of this manual are met.

3.12 Unloading, Storing, and Handling of Piles. The SIMON Supervisor must ensure that all non-essential personnel be kept away from the unloading operations. All piling shall be positioned, stored, and cribbed to prevent shifting or collapse. Store piles away from overhead power lines.

4.0 PRE- AND POST-WORK ADJACENT PROPERTY SURVEYS

4.1 Adjacent Property Surveys. The Area Manager or designee must ensure that contract specifications for pre-construction and post- construction property surveys have been met. If there are no contract requirements, then the Area Manager will determine whether or not property surveys will be completed.

4.2 Drilling vs. Driving or Vibrating Piles. Consideration should be given by the Area Manager to drill and set piles versus impact or vibratory operations if the operation is questionable. A general rule of thumb is that a vibratory hammer typically causes more vibration than an impact hammer.

4.3 Vibration Monitoring. Where the potential for adjacent property damage exists, vibration monitoring must be performed by a qualified engineer or outside consultant during pile load tests and actual driving when necessary.

5.0 FALL PROTECTION

5.1 Guardrails/wires. Guardrails or guard wires must be installed prior to digging the face of a lagging or sheet piling area where an exposure of 6 feet or greater will exist.

5.2 Falling Material. Protection shall be provided on a lagging or sheet piling workface to prevent material from falling onto employees below. Protection is defined as spoil piles/material back at a 2 feet minimum, and/or an extra lagging board at the top to function as a toeboard.

5.3 Fall Protection. Employees must utilize 100% fall protection when exposed to a height of six feet or greater when refueling the hammer or climbing the leads. This means that while climbing the leads that a vertical lifeline and/or retractable lanyard attached to the leads must be utilized for tie-off.

POWER TOOLS AND HAND TOOLS	SECTION 27	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 4

1.0 SCOPE

This section sets the minimum requirements for the safe use and maintenance of power tools and hand tools used at SIMON. This section does not include manufacturers' specific tool safety requirements; therefore it is essential for all SIMON employees to know that this program is the minimum, and that manufacturers' safety requirements are required to be incorporated herein. Additionally, this section does include the requirements of OSHA 29 CFR 1926.28, Subpart I-Hand and Power Tools.

2.0 PURPOSE

The purpose of this program is to provide general technical information on hand and power tools as required by OSHA to all SIMON Supervisory personnel so he or she can ensure their work operations meet the OSHA requirements. In addition, this program does incorporate by reference manufacturers' safety requirements for all hand and power tools, meaning that each SIMON Supervisor must ensure compliance with manufacturers' tool-specific safety requirements and all requirements specified in this program.

3.0 GENERAL REQUIREMENTS

3.1 Manufacturers' Requirements. SIMON Supervisory personnel must ensure that all hand and power tools are used and maintained within the guidelines and safety requirements of the manufacturer in addition to all requirements in this program.

3.2 Inspection. All tools must be inspected prior to each use and during use by the SIMON employee using the tool and inspected by the SIMON Supervisor or designee and documented on the weekly (construction jobs) or monthly (plants and shops) safety inspection checklist. Deficiencies noted must be corrected in a timely manner, and no tool is permitted to be used in a safety-deficient condition.

3.3 Designed Use. All tools must be used only for the purpose for which they are designed.

3.4 Guards. When tools are designed to be equipped with guards, they must be equipped with such guards when in use.

3.5 Housekeeping. Tools are not permitted to be left lying around in walkways or access ways where they could cause slips, trips, and falls.

3.6 Maintenance. Tools must be maintained in a general safe condition in compliance with the OSHA requirements in this program and in accordance with the tool-specific manufacturer's specifications.

3.7 PPE Requirements. Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases will be provided with particular PPE necessary to protect them from the hazard. Additional requirements are outlined in Section 25 (**PERSONAL PROTECTIVE EQUIPMENT**), and Section 29 (**RESPIRATORY PROTECTION**) of this manual.

3.8 Tools with Sharp Edges. Sharp-edged tools must be stored and handled so they may not cause employee injury. Sharp-edged tools may not be carried in clothing pockets.

3.9 Tools Subjected to Impact. Tools subject to impact, such as chisels, punches, drills, wedges, drift pins, and hammers are required to be kept free of cracks and mushroom heads to eliminate the possibility of flying spalls. They must be dressed, repaired, or replaced before use.

3.10 Transporting From One Elevation to Another. Tools, except those normally carried on belts, which must be raised or lowered from one elevation to another, must either be placed in an approved container for transport or firmly attached to hand lines.

3.11 Throwing Tools. Do not throw tools from place to place or from person to person under any circumstance.

3.12 Wired, Tied, or Locked in the "On Position." Switches or valves on any type of power tools, including air tools, are not permitted to be wired, tied, or locked into the on or open position.

3.13 Defective Tools. A tool which becomes defective that affects its safe use must be taken out of service immediately and not put back in service until the repairs have been made.

3.14 Tool Capacity. Tools are not permitted to be used beyond their capacity (e.g. - overloaded jack).

3.15 Non-Sparking Tools. Only non-sparking tools and/or intrinsically safe tools are permitted to be used in locations where sources of ignition may cause a fire or explosion.

4.0 ABRASIVE TOOLS, WHEELS, AND WIRE BRUSHES

4.1 Excessive Wear or Defects. Grinding wheels must be removed from service when excessive wear or defects occur.

4.2 RPM Rating. Only the proper RPM-rated wheel may be mounted on a grinder. Ensure that the RPM on the wheel is equivalent to or exceeds the RPM rating on the grinder.

4.3 Ring Testing Abrasive Wheels. Abrasive wheels must be ring-tested before mounting to ensure that they are free from cracks or defects.

4.4 Fitting Abrasive Wheel. Never force an abrasive wheel on a spindle; it should freely slide onto the spindle. Spindle nuts shall only be tightened enough to securely hold the wheel in place.

4.5 Bench or pedestal grinders. Guarding must completely enclose the wheel except for a maximum of 125 degrees of wheel exposure at the tool rest. The tool rest must be maintained at a maximum of 1/8 inch of clearance to the wheel. The tongue guard must be maintained to a maximum of 1/4 inch to the wheel.

5.0 ELECTRIC TOOLS

5.1 Double Insulated or Grounded. Electrical power tools must have a ground pin on their electrical cord (3-prong type), or be of the double insulated type. Double insulated tools will state "double insulated" on the tool.

5.2 Water or Wet Places. Electrical tools are not permitted to be used while standing in water or where the cord is laying in water.

5.3 Explosive or Flammable Atmospheres. Electrical tools are not permitted to be used in explosive or flammable atmospheres.

5.4 Hoisting and Lowering Electric Tools. The electrical cord is not permitted to be used to hoist or lower an electrical tool.

5.5 Unplugging for Maintenance. Electrical tools must be unplugged when making any adjustments, installing, replacing, or removing any attachments and accessories, or for any maintenance.

6.0 FUEL-POWERED TOOLS

6.1 Refueling. All fuel-powered tools must be shut down and allowed sufficient time to cool prior to refueling.

6.2 Smoking. Smoking is prohibited during refueling.

6.3 Sources of Ignition. Close proximity sources of ignition, such as burning and welding, must be stopped during refueling operations.

7.0 HAND TOOLS

7.1 Wooden Handles. Wooden handles that are loose, cracked, or splintered must be replaced. Painting over cracks/splinters, taping over or together, or lashing the handle with wire is not permitted.

7.2 Tools with Striking Faces. Only tools with striking faces are permitted to be hit with a hammer. Files, screwdrivers, and the like, are not permitted be struck with a hammer or similar object.

8.0 HYDRAULIC POWERED TOOLS

The manufacturer's safe operating pressures for hoses, valves, pipes, and other fittings cannot be exceeded.

9.0 JACKS

9.1 Capacity. The manufacturer's rated capacity must be legibly marked on all jacks and never exceeded.

9.2 Positive Stop. All jacks must have a positive stop to prevent over travel.

9.3 Inspection. Jacks must be inspected in accordance with the manufacturer's specifications.

9.4 Cribbing and Blocking. Cribbing or blocking must be in continuous use as the object being jacked is pushed, pulled, or raised, if any SIMON employee would be in danger of injury if the jack would slip or fall.

9.5 Firm Foundation. When it is necessary to provide a firm foundation, the base of the jack will be blocked or cribbed. If the surface the jack is being supported on is earth, then the jack base is required to be set on substantial hardwood blocking at least twice the size of the jack base, so that blocking will not turn over, shift, or sink.

9.6 Slippage. Where there is a possibility of slippage of the metal jack cap, a wood block will be placed between the cap and the load.

9.7 Jack under Load. Never leave a jack under load with the handle in and not blocked up, regardless of height and weight.

10.0 PNEUMATIC TOOLS AND EQUIPMENT

10.1 Line Pressure. Airline pressure must be maintained as low as possible to effectively accomplish the job at hand, and never exceed the manufacturer's recommendations for the tools or lines being used.

10.2 OSHA Check-Valves. OSHA check valves must be installed at the manifold outlet of each supply line for hand-held pneumatic tools.

10.3 Hose Connections. Hoses must have tie-wire, safety clips, or safety chokers in the safety holes to prevent flying hoses in the event of disconnection.

10.4 Bull Hose Connections must be tightened with a hammer, never just hand tightened.

10.5 Inspection. All hoses and connections must be inspected prior to use for cuts, breaks, loose connections, etc.

10.6 Working Attachments (e.g. - chisel bit). Safety clips or retainers must be installed on all pneumatic impact tools to prevent expulsion of the attachment from the barrel.

10.7 Disconnecting and Bleeding Tools. Before making any adjustments to tools or performing any maintenance, the air must be shut off at the air supply valve ahead of the hose, and the hose will be bled before breaking the airline connection. The airline connection must always be broken prior to performing any adjustments or maintenance on the tool.

10.8 Hoisting and Lowering. Air hoses are not permitted to raise or lower tools, or other equipment.

11.0 PORTABLE GRINDERS AND DISC SANDERS

11.1 Guarding. A guard/shield must cover approximately 75% of the outer edge of the wheel or bar.

11.2 Cup Wheels. Cup-type wheels must be protected by either a revolving cup guard or a band-type guard.

11.3 Safety Flange. A safety flange must be provided when portable abrasive wheels are used for internal grinding.

12.0 POWDER-ACTUATED FASTENING TOOLS

12.1 Employee Training and Education. Each SIMON employee operating a powder-actuated tool must possess a valid operator's card which has been issued for the make and model of the tool to be used. The training and education required to get the operator's card must be completed by the manufacturer's representative (e.g. - HILTI representative). This training and education must be set-up by the SIMON Supervisor-in-charge of the work operation. Typically this training and education is done at the job-site or work area.

12.2 Safety Device Testing. Each day prior to use the SIMON employee using the tool must test the safety devices and ensure they are in the proper working condition. The manufacturer's representative will cover this in the training and education session.

12.3 Tool Deficiencies. Any tool found not in proper working order, or that develops a defect affecting the safe use of the tool, must be immediately removed from service and not used until proper repairs are made.

12.4 Overloading. Do not overload powder-actuated tools (e.g. - higher level of powder shot which is overkill for the job).

12.5 Loading tools. Tools are not permitted to be loaded until firing time. Never point a loaded or empty tool at anyone. Do not leave loaded tools unattended.

12.6 Hard or Brittle Material. Fasteners are not permitted to be driven into very hard or brittle materials such as cast iron, glazed or ceramic tile, glass block, rock, etc.

12.7 Easily-Penetrated Material. Driving fasteners into materials that are easily penetrated must be avoided unless such materials are backed by a substance that will prevent pass through of the fastener, where it could become a flying hazard on the other side.

12.8 Spalled Areas. Fasteners are not permitted to be driven into spalled concrete, or too close to the edge of concrete where immediate spalling would occur.

12.9 Explosive or Flammable Atmospheres. Do not use powder-actuated tools in explosive or flammable atmospheres.

12.10 Misfires. In the event of a misfire, the manufacturer's guidelines must be followed by the SIMON employee operating the tool.

12.11 Shot Strips Disposal. Unused shot strips or any unused shot is not permitted to be disposed of by throwing on the floor or ground. Unused shot must be properly disposed of.

13.0 WOODWORKING TOOLS

13.1 Circular Saws. Circular saws must be equipped with a functional manufacturer's guard at all times.

13.2 Cut-Off Saws. A cut-off (e.g. - 14" carb saw) is not permitted to be equipped with a wood blade and is not permitted to be used to cut wood.

RIGGING	SECTION 28	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 6

1.0 SCOPE

This section sets the minimum requirements to be followed by SIMON Supervisory personnel and their employees while using rigging equipment for conducting all rigging operations. This section applies to slings used in conjunction with material-handling equipment for the movement of material by hoisting or pulling. Additionally, this section encompasses the requirements of OSHA 29 CFR 1926.251- Subpart H, Rigging Equipment for Material Handling.

2.0 PURPOSE

The purpose of this rigging program is to provide technical information for SIMON Supervisory personnel to do the following: meet the OSHA general rigging requirements, follow general safe rigging principles, meet the training requirements, meet the inspection requirements, and to meet the general as well as specific requirements for wire rope, chain-alloy steel, synthetic slings, shackles/hooks, U-bolt and fist grip clips, and attachments.

3.0 DEFINITIONS

Competent Person: A competent person is the on-site SIMON Supervisor conducting any rigging and lifting or pulling operation where wire rope, chain-alloy steel, synthetic slings, hooks/shackles, U-bolt and fist grip clips, and/or specialty rigging items or attachments are used. This SIMON Supervisor will have received the training as required by this program and know and understand all required criteria outlined herein. This SIMON Supervisor will also be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees, and this SIMON Supervisor does have the authority to take prompt corrective action to ensure the work pertaining to rigging, lifting, or pulling operations are safe.

Center of Gravity: The center of gravity is the specific area on the load where it will try and balance itself once off of the ground. Although not always possible, you must work to achieve rigging for the center of gravity. The reason being is that the load will always shift to compensate for center of gravity, and many injuries/accidents are caused due to failure to rig for the center of gravity. Rigging for the center of gravity minimizies the possibility of load shift and excessive and uncontrolled swinging of the load.

Proof Test: A nondestructive tension test performed by the sling manufacturer or an equivalent entity to verify construction and workmanship of a sling. Chain slings are required to be proof tested by the manufacturer.

Working Load Limit: The rated capacity for a sling and attachments that may not be exceeded.

4.0 GENERAL RIGGING REQUIREMENTS

4.1 Load Limit. All rigging equipment may not be loaded in excess of its safe working load limit.

4.2 Weight of Load. The employee rigging the load must always know the weight of the load being rigged. The operator hoisting or pulling the load must always know the weight of the load. The rigging equipment is considered part of the weight of the load.

4.3 Sling Angle. The employee rigging the load must know the capacity of the sling and all rigging equipment based on the angle to the load and configurations of the rigging equipment.

4.4 Rigging Configuration. The employee rigging the load must know the capacity of the sling and all rigging equipment based on the configuration of slings, number of legs of slings, type of hitch (e.g. - choker, basket, straight, etc.), etc.

4.5 Load Balance Check. Where applicable as determined by the operator and employee conducting the rigging, pick up the load a few inches off of the ground or working level to check the load for balance and security prior to hoisting it.

4.6 Sharp Edges. Where applicable, use softeners on sharp edges and secure them so there will be less danger of the load falling out while traveling and when the sling is released.

4.7 Obstructions. Suspended loads must be kept clear of obstructions while traveling. A suspended load catching on an obstruction may cause shock loading, overloading of the slings, or overloading of the crane or material handler.

4.8 Overhead Lifting. Loads are not permitted to be traveled above any employee's head.

4.9 Unused Rigging. All rigging equipment when not in use must be picked-up and removed from the immediate work area to prevent damage to the rigging equipment, and to prevent a hazard to any employee. Unused rigging equipment must not be stored on the ground, because this may cause it to be susceptible to the weather and corrosion.

4.10 Tag Lines. Use tag lines where applicable. This must be determined by the SIMON Supervisor.

4.11 Signaling Loads. Standard Hand Signals and/or radio communication must be used to signal loads for movement. Standard hand signals are in Appendix 10D of Section 10 **(CRANES).** In some cases (e.g. - utility work), signaling may not be needed because it may be clear and obvious where an equipment operator is picking and moving a load to.

5.0 STRUCK BY/CAUGHT BETWEEN/PINCH POINTS

It is imperative and required for all SIMON employees to keep out of the way of a traveling load, to keep out of an area between a traveling load and stationary object, to stay out from underneath a traveling load, and keep hands/fingers/body parts out of pinch areas while securing rigging to loads before and during lifting and pulling. When using tag lines, employees should not be between the load and where it is going. Employees should walk and trail the load when using a tag line.

6.0 RIGGING TRAINING

Each employee who will be exposed to rigging and lifting must be trained in safe rigging practices, sound rigging principles, rigging with wire rope, rigging with chain-alloy steel, rigging with synthetic slings, shackles/hooks, attachments, all other like devices, and basic skills in regards to specialty items (e.g.- pipe pick, jr.).

At a minimum, all SIMON Supervisors who perform rigging operations are required to attend an 8-hour rigging course. Course attendance will be during the winter training season. Additional employees will also be required to complete the course as determined by the Area Manager, with input from the SIMON Safety Department.

Re-training and periodic training will be supplemented by the SIMON Supervisor through tool-box meetings and when the SIMON Area Manager, Supervisor, or Safety Department determines that a refresher course needs to be completed. Specialty rigging items may require site-specific or equipment-specific training, and this will be determined on a case-by-case basis. All training will be documented and then maintained by the SIMON Safety Department.

7.0 RIGGING INSPECTION

7.1 Daily Inspection and Routine Inspection. The SIMON Supervisor must ensure that all rigging equipment and components will be inspected prior to use on each shift and as necessary during its use to ensure that it is safe.

7.2 Weekly or Monthly Inspections. At a minimum, the SIMON Supervisor must document a detailed inspection of all rigging equipment on the Foremen's Weekly or Monthly Safety Inspection Report, Section 31 **(SAFETY INSPECTIONS)**, Appendices 31A and 31B.

7.3 Manufacturer's Guidelines. Certain types of rigging equipment may require specific types of inspections at specific intervals either by the SIMON Supervisor, or by the manufacturer, and re-certification may even be required. This is the responsibility of the SIMON Supervisor-in-charge of the work operation.

7.4 Deficiencies and Taking Out of Service. Any rigging with obvious defects as determined by the SIMON Supervisor and/or trained employees must be removed from service immediately. Any rigging with defects as specified in this program must be removed from service immediately. For example, a missing tag is considered defective and warrants immediate removal from service.

8.0 SLING SAFE PRACTICES

The three most common types of slings utilized at SIMON are wire rope, chain-alloy steel, and synthetic slings. There are basic safe working principles that apply to all three types, and the requirements are as follows:

8.1 Basket Hitch. Slings used in a basket hitch must have the load balanced to prevent slippage.

8.2 Pulling Sling from Underneath Load. Slings may not be pulled from under a load when the load is resting on the sling.

8.3 Secured to Load. Slings must be securely attached to their loads.

8.4 Shock Loading. Loads must be traveled in a smooth and even manner.

8.5 Shortening or Makeshift Devices. Slings may not be shortened with knots, bolts, or makeshift devices.

8.6 Sling Length. Rule of thumb for multiple sling picks. The sling leg should be equal to or longer than the distance between the lifting points. This will ensure at least a 60 degree angle to the horizontal.

9.0 CHAIN-ALLOY STEEL

9.1 Attachments. Hooks, rings, oblong links, master links, pear-shaped links, welded or mechanical coupling links or other attachments must have a rated capacity at least equal to that of the alloy steel chain with which they are used or the sling cannot be used in excess of the rated capacity of the weakest component.

9.2 Chain Wear. Whenever chain wear exceeds that in the table below, the chain must be taken out of service. Measurement can be done with a chain gauge, or measuring caliper.

CHAIN SIZE (INCH)	MAXIMUM ALLOWABLE WEAR (INCH) (NOMINAL REDUCTION)
1/4	3/64
3/8	5/64
1/2	7/64
5/8	9/64
3/4	5/32
7/8	11/64
1	3/16

9.3 Deformed Attachments. Chain slings with cracked or deformed master links, coupling links, or other components must be removed from service.

9.4 Grade 8 or Higher. All chain used for rigging, lifting, and pulling must be of grade 8 or higher.

9.5 Identification Tag. Welded alloy steel chain slings must have a permanently affixed durable identification tag stating the chain size, grade, rated capacity, and reach.

9.6 Makeshift Attachments. Makeshift links or fasteners formed from bolts or rods, or the like, may not be used.

9.7 Repairs. Repairs to chain slings may only be made by a qualified person at SIMON and/or the chain sling manufacturer. Mechanical couplings may not be used to repair broken lengths of chain.

9.8 Safe Operating Temperatures. Alloy steel chains must be removed from service if they are heated above 1,000 degrees Fahrenheit. When exposed to temperatures in excess of 600 degrees Fahrenheit the working load limit must be de-rated per the manufacturer's requirements.

9.9 Working Load Limit. The rated capacity identified on the identification tag cannot be exceeded under any circumstance. The working load limit must be in accordance with the manufacturer's requirements for the chain, attachments, and all components.

10.0 WIRE ROPE

10.1 Attachments. Hooks, rings, oblong links, master links, pear-shaped links, welded or mechanical coupling links or other attachments must have a rated capacity at least equal to that of the wire rope with which they are used or the sling cannot be used in excess of the rated capacity of the weakest component.

10.2 D/d Ratio for Wire Rope. The diameter of curvature around which a wire rope sling is bent affects its capacity. This is known as the D/d ratio. The big D represents the diameter of a sheave, drum, or the diameter of the object being rigged. The little d is the diameter of the wire rope. A good rule of thumb to follow is to try to keep at least a 6:1 ratio which results in 80% efficiency (means a 20% reduction in capacity) of the sling. Refer to the chart below.

D/d RATIO	WIRE ROPE SLING STRENGTH EFFICIENCIES (REDUCED CAPACITY FROM 100%)
20:1	100%
15:1	88%
10:1	86%
8:1	84%
6:1	80%
4:1	75%
2:1	65%
1:1	50%

10.3 Deformed Attachments. Wire rope slings with cracked or deformed master links, or other components must be removed from service.

10.4 Identification Tag. Wire rope slings must have a permanently affixed durable identification tag stating the wire rope size, rated load for types of hitches, and angle for which it is based.

10.5 Kinking and Bird caging. Wire rope slings may not be utilized that are kinked or bird caged.

10.6 Makeshift Attachments or Devices. Wire rope slings may not be shortened with knots, bolts, or other makeshift devices.

10.7 Repairs. Wire rope may not be repaired. When wire rope becomes deficient, it must be discarded.

10.8 Safe Operating Temperatures. Slings may not be heated in excess of the manufacturer's requirements.

10.9 Wire Wear.

10.9.1 Broken Wires. At a minimum, wire rope will not be used if, in any length of eight diameters, the total number of visible broken wires exceeds 10% of the total wires, or if the rope shows other signs of excessive wear, corrosion, or defect. Additionally, specific wire rope manufacturers may have more stringent requirements in regards to the number of broken wires. If this is the case, the more stringent requirement must be followed.

10.9.2 Nominal Reduction in Diameter. When the reduction in nominal diameter exceeds the manufacturer's allowable limit, the wire rope sling must be taken out of service. This can be checked with a measuring caliper.

10.10 Working Load Limit. The rated capacity identified on the identification tag cannot be exceeded under any circumstance. The working load limit must be in accordance with the manufacturer's requirements for the wire rope, attachments, and all components.

11.0 SYNTHETIC SLINGS

11.1 Attachments. Hooks, attachments, and all fittings must have a minimum breaking strength equal to that of the sling with which they are used or the sling cannot be used in excess of the rated capacity of the weakest component. Hooks, attachments, and all fittings must be free of all sharp edges that could in any way damage the webbing.

11.2 Deficiencies- Take Out of Service. Any synthetic web sling must be removed from service immediately if any of the following conditions are present.

11.2.1 Acid or caustic burns.

11.2.2 Melting or charring of any part of the sling surface.

11.2.3 Snags, punctures, tears, or cuts. The SIMON Supervisor must make this determination as the competent person.

11.2.4 Broken or worn stitches. The SIMON Supervisor must make this determination as the competent person.

11.2.5 Distortion of fittings.

11.3 Environmental Considerations. When synthetic web slings are used, the following precautions shall be taken.

11.3.1 Nylon slings cannot be used where fumes, vapors, sprays, mists or liquids of acids or phenolics are present.

11.3.2 Polyester or polypropylene web slings cannot be used where fumes, vapors, sprays, mists or liquids of caustics are present.

11.3.3 Web slings with aluminum fittings cannot be used where fumes, vapors, sprays, mists or liquids of caustics are present.

11.4 Identification Tag. Synthetic slings must have a permanently affixed durable identification tag stating the name or trademark of the manufacturer, rated capacity for the type of hitch, and type of material the sling is made from.

11.5 Makeshift Attachments or Devices. Synthetic slings may not be shortened with knots, or other makeshift devices.

11.6 Repairs. Synthetic slings may not be repaired. When synthetic slings becomes deficient, then they must be discarded. The best way to discard a synthetic sling is to cut the eyes out of it.

11.7 Safe Operating Temperatures. No synthetic sling can be used at temperatures in excess of 180 degrees Fahrenheit. If this occurs, the sling must immediately be taken out of service.

11.8 Working Load Limit. The rated capacity identified on the identification tag cannot be exceeded under any circumstance.

12.0 SHACKLES AND HOOKS

12.1 Shackles. Shackles must be used in accordance with the manufacturer's requirements. The rated capacity identified on the shackle cannot be exceeded under any circumstance. Shackles used must always be of the screw pin type.

12.2 Hooks. Hooks must be used in accordance with the manufacturer's requirements. If a hook is equipped with a safety latch ("mouse"), then the safety latch must always be in place. If a hook does not come equipped from the manufacturer with a safety latch, then a safety latch is not required. However, no hook without a safety latch can be used for overhead lifting.

13.0 CABLE CLAMPS (U-BOLTS AND FIST GRIP)

13.1 Number and Spacing of Clips. When U-bolt or fist grip wire rope clips are used to form eyes in wire rope, the following table must be used to determine the number and spacing of clips.

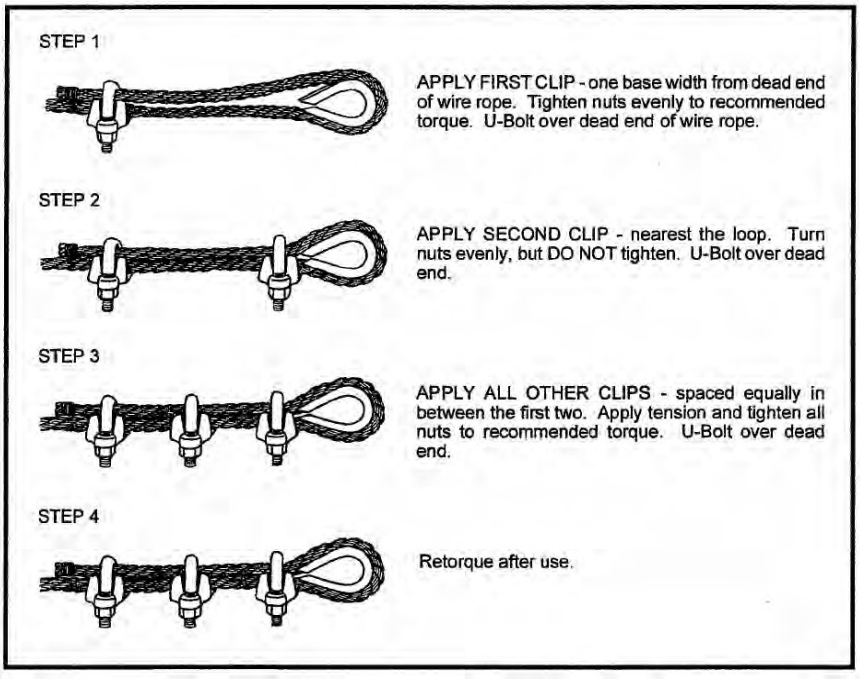
Diameter of wire rope	# of clips drop forged	# of clips other material	# of clips for fall protection	Minimum spacing (inches)
1/4	2	3	3	3
3/8	2	3	3	3
1/2	3	4	4	3
5/8	3	4		3 3/4
3/4	4	5		4 1/2
7/8	4	5		5 1/4
1	5	6		6
1 1/8	6	6		6 3/4
1 1/4	6	7		7 1/2

13.2 Overhead Lifting. Using U-bolts or fist grip clips to form an eye for overhead lifting is not permissible. A manufactured wire rope eye is required.

13.3 Proper Installation of Fist Grip Clips. Fist grip clips can be installed in either direction. There is no backwards installation.

13.4 Proper Installation of U-Bolts. Refer to the diagram below for proper installation. Always remember, don't put the saddle end on the dead end of wire rope. The saying goes, "don't saddle a dead horse."

Installation of Wire Rope Clips



RESPIRATORY PROTECTION	SECTION 29	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 5

1.0 SCOPE

This section will set the requirements for the selection, use and care of, maintenance, and medical surveillance for all SIMON employees wearing a respirator. Additionally, this section encompasses the requirements of OSHA 29 CFR 1926.103, Subpart E- Respiratory Protection and OSHA 29 CFR 1910.134, Subpart E- Respiratory Protection. This program is administered and evaluated by the Corporate Program Administrator (SIMON Corporate Safety Director) or his designee.

2.0 PURPOSE

This program is to ensure compliance with all aspects of the OSHA requirements for Respiratory Protection and to provide technical information to SIMON Supervisory personnel and to the SIMON Safety Department to ensure compliance with the following: all requirements of this respiratory protection program, medical evaluation and surveillance program, fit testing requirements, requirements for non-mandatory use of respirators, respiratory selection requirements, and the maintenance and care of respirators.

3.0 APPLICABILITY OF THIS PROGRAM

3.1 Mandating the Use of a Respirator. Through prudent industrial hygiene techniques, air testing, and/or sound industrial hygiene judgment, the SIMON Safety Department will establish when a respirator is required and not required to be worn by a SIMON employee. Established air testing data will be maintained by the SIMON Safety Department and will be available for review at the request of any SIMON Supervisor.

3.2 Respirator Required for Work. All criteria in this program must be strictly followed when the use of a respirator is required by a program and/or policy in the Corporate Safety Manual, or mandated by the SIMON Safety Department for a specific operation. It is the responsibility of the most senior SIMON Supervisor on the job to coordinate with the SIMON Safety Department, the indoctrination of employees into this program prior to any employee commencing work in a respirator-required environment prior to the employee's initial assignment. This must be done with sufficient notice (e.g. - two to three weeks) because of time constraints needed to comply with medical evaluations, fit-testing, training and education issues, and ordering and delivery of a respirator(s).

3.3 Voluntary use of a Respirator. When an employee voluntarily requests a respirator for use, other than a dust mask (e.g.- Half- Face Negative Pressure Respirator), then all aspects and requirements of this program are applicable and mandatory as stated in heading 3.2 above.

3.4 Voluntary use of a Dust Mask (Filtering Face piece). This program does not apply to employees voluntarily requesting a dust mask for work operations where the SIMON Safety Department has not mandated use of respiratory protection. However, Appendix 29A (**USING RESPIRATORS WHEN NOT REQUIRED**) must be issued and reviewed with the employee. This will be done at the time of new-hire orientation and issued and required as part of the weekly tool-box talks on an annual basis.

3.5 Immediately Dangerous to Life and Health (IDLH) Atmospheres. Under no circumstances are SIMON employees permitted to work in IDLH atmospheres. It is the responsibility of the SIMON Supervisor to ensure this does not occur. If an IDLH atmosphere is encountered, work must be stopped and the SIMON Supervisor must contact the SIMON Safety Department so that the work area can be assessed and evaluated. If it is decided that work would commence in an IDLH atmosphere, SIMON will subcontract out this type of work to be performed by a qualified contractor. Prior to any work being done, a thorough review of the subcontractor's safety program will occur by the SIMON Safety Department to ensure compliance with all applicable OSHA requirements for IDLH atmospheres.

4.0 DEFINITIONS

Air-Purifying Respirator: A respirator with an air-purifying filter, cartridge, or canister that removes specific contaminants by air passing through the filter (e.g. - Half-Face or Full-Face Negative Pressure Respirator).

Approved Respirator: A respirator that has been selected by the SIMON Safety Department through an approved safety equipment vendor, approved for use by the SIMON Safety Department, and SIMON Supervisory personnel are permitted to purchase. Any respirator other than a dust mask can only be purchased by the SIMON Safety Department. All other respirators are not approved for use.

Assigned Protection Factor (APF): The level of protection that a respirator is expected to provide to a SIMON employee, compared to the OSHA Permissible Exposure Limits. An example of this is that a PAPR respirator has an Assigned Protection Factor of 1,000. This means that the respirator will protect an employee to 1,000 times the OSHA Permissible Exposure Limit for specific contaminants.

Fit Test: A measure of the quantitative or qualitative effective fit to keep contaminants out of a respirator worn by a SIMON employee. An Assigned Protection Factor is assigned once a fit test is passed by an employee.

Negative Pressure Respirator: A respirator that is tight fitting and that draws air through the filters by breathing in.

Positive Pressure Respirator: A respirator that pushes air through the filters by an outside source (e.g. - battery pack with motor, compressor, etc.).

(PAPR) Power Air-Purifying Respirator: A respirator that uses a blower to force air through the filters into the breathing area. This respirator is used at SIMON for all Lead Work and Related Metals Operations as outlined in Section 19 (**LEAD WORK AND RELATED METALS**) of this manual. This respirator may be used for other work operations when determined by the SIMON Safety Department.

Seal Check: A negative pressure and positive pressure check by a SIMON employee every time the respirator is put on and prior to use in an air contaminated area. This is done to determine if the respirator is seated to the face.

5.0 SELECTION AND PURCHASE OF RESPIRATORS

5.1 Selection of Respirators. Respirators can only be purchased that have been approved by the SIMON Safety Department, and are on The SIMON safety equipment list. Other respirators (makes, models, mfrs., etc.) will be made available and approved as necessary. All respirators used at SIMON must be approved by NIOSH. All respirators will be provided to SIMON employees at no ($$$) cost.

5.2 Purchase of Dust Masks. Approved dust masks may be purchased by SIMON Supervisory personnel and used by SIMON employees without any notification to the SIMON Safety Department.

5.3 Purchase of All Other Respirators. The SIMON Safety Department must be notified prior to the purchase of any respirator other than an approved dust mask. This is required to ensure adequacy of the respirator(s) being purchased, and to ensure indoctrination of the SIMON employee(s) into this respiratory protection program. In all cases, other than a dust mask, the Safety Department will purchase the respirator(s).

6.0 MEDICAL EVALUATION

Any SIMON employee required to wear an approved respirator will be required to be indoctrinated into the medical evaluation process of this program as required in this section. It is the responsibility of the most senior SIMON Supervisor on the job to ensure that this occurs. The requirements of the medical evaluation process are as follows:

6.1 Initial Evaluation. An initial evaluation will be conducted by a Physician or Licensed Health Care Practitioner (LHCP) at one of SIMON' occupational medicine panel providers. The medical questionnaire in Appendix 29B must be issued to the employee by the SIMON Safety Department, confidentially completed by the employee, and confidentially given to the Physician/LHCP by the SIMON employee. The Physician/LHCP will use this for his/her initial evaluation. A comparable medical questionnaire is acceptable if provided by the occupational medicine panel provider.

6.2 The Physician/LHCP will utilize the questionnaire in accordance with OSHA 29 CFR 1910.134 (c) - Medical Evaluation, to determine the SIMON employee's ability to wear a respirator.

6.3 On-Going Medical Evaluation.

6.3.1 Negative Pressure Respirator. At a minimum, any SIMON employee required to wear a negative-pressure respirator will go through the medical evaluation process annually, or at a shorter time frame determined by the Physician/LHCP.

6.3.2 Positive Pressure Respirator. At a minimum, any employee required to wear a positive-pressure respirator will go through the medical evaluation process every 2 years, or at a shorter time frame determined by the Physician/LHCP.

6.3.3 Additional Medical Evaluations. An employee will be provided with an additional medical evaluation if he/she reports medical signs or symptoms that are related to his/her ability to use the respirator, when the Physician/LHCP determines it to be necessary, or when changes in the work conditions occur which increase the physiological burden on the employee.

6.4 Supplemental Information Provided to the Physician/LHCP. The following information will be submitted to the Physician/LHCP for the medical evaluation process.

6.4.1 A copy of this written Respiratory Protection Program.

6.4.2 Type and weight of the respirator to be used by the employee.

6.4.3 Duration and frequency of respirator use.

6.4.4 Expected physical work effort.

6.4.5 Additional protective clothing and equipment to be worn by the employee.

6.4.6 Temperature and humidity extremes to be encountered by the employee.

6.5 Medical Determination. The SIMON Safety Department and the SIMON employee will be issued a written recommendation regarding the employee's ability to use the respirator from the Physician/LHCP. This will be placed in the employee's personnel file with the SIMON human resources department.

7.0 FIT TESTING

7.1 Initial Fit Testing. Once the SIMON employee satisfactorily completes the medical evaluation process he/she will then be fit tested. This will be completed by a representative at the SIMON occupational medicine panel provider's office. A qualitative fit test will be done at a minimum. The Respirator Fit Test Form in Appendix 29D must be completed. The respirator to be worn by the employee will be taken by the employee to the fit testing. This respirator will be used to do the fit testing.

7.2 Change in Type of Respirator. If for any reason, the make, model, size, style, or manufacturer of the respirator is changed, then the employee will be required to be fit tested on that particular respirator prior to use.

7.3 Annual Fit Testing. Once employees receive their fit test, they must be fit tested annually thereafter.

7.4 Additional Fit Testing. Fit testing will be required whenever changes in the physical condition of the employee occurs—for example, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

8.0 RESPIRATOR USE

8.1 Face Piece Seal Protection. Tight fitting respirators are not permitted to be worn by employees who have:

8.1.1 Facial hair that comes between the sealing surface of the face piece and the face with valve function.

8.1.2 Any condition that interferes with the face-to-face piece seal or valve function.

8.1.3 Corrective lenses (glasses) that interfere with the face-to-face piece seal.

8.2 User Seal Check. SIMON employees will be instructed as part of their training as specified in heading 11.0 of this program, on how to perform a negative and positive seal check of the respirator. A seal check is required every time an employee puts on a respirator.

8.3 Cartridge Change-Out. SIMON employees will be instructed as part of their training on changing filter cartridges and/or if they detect break-through of a contaminant. Change-out is required to be done by the employees if either of these occur. Employees must leave the work area immediately if break-through or resistance in the filter occurs and perform a change-out. Regular and routine change-out of cartridges are required and will be addressed in training.

9.0 MAINTENANCE AND CARE OF RESPIRATORS

9.1 Cleaning and Disinfecting. It is the responsibility of the SIMON Supervisor and each employee assigned a respirator to ensure that respirators are kept clean, sanitary, and in good working order. Each respirator issued to an employee must be cleaned by the employee as often as necessary to be maintained in a sanitary condition. Washing and cleaning

of the respirator will be done outside of the work area where airborne contaminants are. It is the responsibility of the SIMON Supervisor overseeing the work to ensure that respirator wipes are available to employees cleaning the respirators or that other means necessary to clean the respirators are available and in accordance with the manufacturer's cleaning guidelines.

9.2 Storage. The SIMON Supervisor and each employee assigned a respirator are responsible to ensure that the respirators when stored are protected from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they must be stored to prevent deformation of the face piece and exhalation valve.

9.3 Inspection. It is the responsibility of the SIMON Supervisor and each employee assigned a respirator to inspect the respirator before each use and during cleaning for the following items: tightness of connections and condition of various parts including, but not limited to: the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters. In addition to the continuous inspections, the Respirator Inspection Record in Appendix 29C must be completed once per week by the employee using the respirator, for as long as the respirator is in use.

9.4 Repairs. If deficiencies are found that jeopardize proper functioning of the respirator, then it must either be removed from service and sent to the manufacturer for repairs or properly discarded.

9.5 Washing of Respirator/Hands/Face/Etc. For sanitary reasons and to protect the employee(s), he/she must leave the work area where contaminants are to wash hands/face/etc. prior to any break, lunch, and/or dinner. In addition, if the respirator is going to be wiped down, cleaned, and/or disinfected the employee must leave the work area where contaminants are to perform this function.

10.0 BREATHING AIR FOR SUPPLIED AIR HOODS (BLASTING HOODS)

It is the responsibility of the SIMON Supervisor to ensure that all manufacturer's criteria are met in regards to the air employees will breathe with supplied air hoods, and all criteria for use as required by the manufacturer.

11.0 EMPLOYEE TRAINING

11.1 Annual Training. Employees required to wear a respirator will receive training annually. This training will be conducted by the SIMON Safety Department. Each employee will be required to demonstrate what he/she was educated on, and will consist of the following items:

11.1.1 Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator.

11.1.2 What the limitations and capabilities of the respirator are.

11.1.3 How to inspect, put on and remove, use, and check the seals of the respirator.

11.1.4 What the procedures are for maintenance and storage of the respirator.

11.1.5 How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.

11.1.6 All criteria required in this program.

11.2 More Frequent Training. Training will also be done when the following situations occur:

11.2.1 Changes in the type of respirator.

11.2.2 The employee assigned the respirator cannot demonstrate the competencies as required in this program.

12.0 RECORDKEEPING

12.1 Written Records. Written records will be kept of the medical evaluations, fit testing, air testing for contaminants, and the respirator program.

12.2 Medical Evaluations. Medical evaluation records will be kept by the SIMON Human Resources Department and by the SIMON occupational medicine panel provider.

12.3 Fit Testing. Written records of the fit testing will be kept by the SIMON Safety Department. These records will contain the following:

12.3.1 Name of employee tested.

12.3.2 Type of fit test performed.

12.3.3 Specific make, model, style, and size of respirator tested.

12.3.4 Date of test.

12.3.5 Pass or fail results for a qualitative fit test, or a fit factor for a quantitative test.

12.3.6 Records will be retained at least until the next fit test is conducted.

MANDATORY INFORMATION FOR EMPLOYEES USING RESPIRATORS WHEN NOT REQUIRED UNDER OSHA 1910.134	APPENDIX 29A	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.

2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.

3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

OSHA RESPIRATOR MEDICAL EVALUATION QUESTIONNAIRE	APPENDIX 29B	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 6

Note to the employer: Answers to questions in Part A Section 1, and to question 9 in Part A Section 2, do not require a medical examination.

Can you read? (Circle one): Yes/No

Your employer must allow you to answer this questionnaire during normal working hours, or at a time and place that is convenient to you. To maintain your confidentiality, your employer or Supervisor must not look at or review your answers, and your employer must tell you how to deliver or send this questionnaire to the health care professional who will review it.

PART A

Section 1 (Mandatory) The following information must be provided by every employee who has been selected to use any type of respirator (please print).

1) Today's date:_____

2) Your name:_____

3) Your age (to nearest year):_____

4) Sex (circle one): Male/Female

5) Your height:_____ft.___in.

6) Your weight:_____lbs.

7) Your job title:_____

8) A phone number where you can be reached by the health care professional who reviews this questionnaire (include the Area Code): _____

9) The best time to phone you at this number: _____

10) Has your employer told you how to contact the health care professional who will review this questionnaire (circle one): Yes/No

11) Check the type of respirator you will use (you can check more than one category):

(a) ___N, R, or P disposable respirator (filter-mask, non- cartridge type only).

(b) ___Other type (for example, half- or full-face piece type, powered-air purifying, supplied-air, self-contained breathing apparatus).

12) Have you worn a respirator (circle one): Yes/No

If "yes," what type(s)?_____

Section 2 (Mandatory) Questions 1 through 9 below must be answered by every employee who has been selected to use any type of respirator (please circle "yes" or "no").

1) Do you **currently** smoke tobacco, or have you smoked tobacco in the last month: Yes/No

2) Have you **ever had** any of the following conditions?

(a) Seizures (fits): Yes/No

(b) Diabetes (sugar disease): Yes/No

(c) Allergic reactions that interfere with your breathing: Yes/No

(d) Claustrophobia (fear of closed-in places): Yes/No

(e) Trouble smelling odors: Yes/No

3) Have you **ever had** any of the following pulmonary or lung problems?

(a) Asbestosis: Yes/No

(b) Asthma: Yes/No

(c) Chronic bronchitis: Yes/No

(d) Emphysema: Yes/No

(e) Pneumonia: Yes/No

(f) Tuberculosis: Yes/No

(g) Silicosis: Yes/No

(h) Pneumothorax (collapsed lung): Yes/No

(i) Lung cancer: Yes/No

(j) Broken ribs: Yes/No

(k) Any chest injuries or surgeries: Yes/No

(l) Any other lung problem that you've been told about: Yes/No

4) Do you **currently** have any of the following symptoms of pulmonary or lung illness?

(a) Shortness of breath: Yes/No

(b) Shortness of breath when walking fast on level ground or walking up a slight hill or incline: Yes/No

(c) Shortness of breath when walking with other people at an ordinary pace on level ground: Yes/No

(d) Have to stop for breath when walking at your own pace on level ground: Yes/No

(e) Shortness of breath when washing or dressing yourself: Yes/No

(f) Shortness of breath that interferes with your job: Yes/No

(g) Coughing that produces phlegm (thick sputum): Yes/No

(h) Coughing that wakes you early in the morning: Yes/No

(i) Coughing that occurs mostly when you are lying down: Yes/No

(j) Coughing up blood in the last month: Yes/No

(k) Wheezing: Yes/No

(l) Wheezing that interferes with your job: Yes/No

(m) Chest pain when you breathe deeply: Yes/No

(n) Any other symptoms that you think may be related to lung problems: Yes/No

5) Have you **ever had** any of the following cardiovascular or heart problems?

(a) Heart attack: Yes/No

(b) Stroke: Yes/No

(c) Angina: Yes/No

(d) Heart failure: Yes/No

(e) Swelling in your legs or feet (not caused by walking): Yes/No

(f) Heart arrhythmia (heart beating irregularly): Yes/No

(g) High blood pressure: Yes/No

(h) Any other heart problem that you've been told about: Yes/No

6) Have you **ever had** any of the following cardiovascular or heart symptoms?

(a) Frequent pain or tightness in your chest: Yes/No

(b) Pain or tightness in your chest during physical activity: Yes/No

(c) Pain or tightness in your chest that interferes with your job: Yes/No

(d) In the past two years, have you noticed your heart skipping or missing a beat: Yes/No

(e) Heartburn or indigestion that is not related to eating: Yes/ No

(f) Any other symptoms that you think may be related to heart or circulation problems: Yes/No

7) Do you **currently** take medication for any of the following problems?

(a) Breathing or lung problems: Yes/No

(b) Heart trouble: Yes/No

(c) Blood pressure: Yes/No

(d) Seizures (fits): Yes/No

8) If you've used a respirator, have you **ever had** any of the following problems? (If you've never used a respirator, check the following space and go to question 9 _____)

(a) Eye irritation: Yes/No

(b) Skin allergies or rashes: Yes/No

(c) Anxiety: Yes/No

(d) General weakness or fatigue: Yes/No

(e) Any other problem that interferes with your use of a respirator: Yes/No

9) Would you like to talk to the health care professional who will review this questionnaire about your answers to this questionnaire: Yes/No

Questions 10 to 15 below must be answered by every employee who has been selected to use either a full-face piece respirator or a self-contained breathing apparatus (SCBA). For employees who have been selected to use other types of respirators, answering these questions is voluntary.

10) Have you **ever lost** vision in either eye (temporarily or permanently): Yes/No

11) Do you **currently** have any of the following vision problems?

(a) Wear contact lenses: Yes/No

(b) Wear glasses: Yes/No

(c) Color blind: Yes/No

(d) Any other eye or vision problem: Yes/No

12) Have you **ever had** an injury to your ears, including a broken ear drum: Yes/No

13) Do you **currently** have any of the following hearing problems?

(a) Difficulty hearing: Yes/No

(b) Wear a hearing aid: Yes/No

(c) Any other hearing or ear problem: Yes/No

14) Have you **ever had** a back injury: Yes/No

15) Do you **currently** have any of the following musculoskeletal problems?

(a) Weakness in any of your arms, hands, legs, or feet: Yes/No

(b) Back pain: Yes/No

(c) Difficulty fully moving your arms and legs: Yes/No

(d) Pain or stiffness when you lean forward or backward at the waist: Yes/No

(e) Difficulty fully moving your head up or down: Yes/No

(f) Difficulty fully moving your head side to side: Yes/No

(g) Difficulty bending at your knees: Yes/No

(h) Difficulty squatting to the ground: Yes/No

(i) Climbing a flight of stairs or a ladder carrying more than 25 lbs.: Yes/No

(j) Any other muscle or skeletal problem that interferes with using a respirator: Yes/No

PART B

Any of the following questions, and other questions not listed, may be added to the questionnaire at the discretion of the health care professional who will review the questionnaire.

1) In your present job, are you working at high altitudes (over 5,000 feet) or in a place that has lower than normal amounts of oxygen: Yes/No

If "yes," do you have feelings of dizziness, shortness of breath, pounding in your chest, or other symptoms when you're working under these conditions: Yes/No

2) At work or at home, have you ever been exposed to hazardous solvents, hazardous airborne chemicals (e.g., gases, fumes, or dust), or have you come into skin contact with hazardous chemicals: Yes/No

If "yes," name the chemicals if you know them:

_____

_____

5) Have you ever worked with any of the materials, or under any of the conditions, listed below:

(a) Asbestos: Yes/No

(b) Silica (**e.g.**, in sandblasting): Yes/No

(c) Tungsten/cobalt (e.g., grinding or welding this material): Yes/No

(d) Beryllium: Yes/No

(e) Aluminum: Yes/No

(f) Coal (for example, mining): Yes/No

(g) Iron: Yes/No

(h) Tin: Yes/No

(i) Dusty environments: Yes/No

6) Any other hazardous exposures: Yes/No

If "yes," describe these exposures: _____

_____

8) List any second jobs or side businesses you have:

_____

9) List your previous occupations:

_____

11) List your current and previous hobbies:

_____

13) Have you been in the military services? Yes/No

If "yes," were you exposed to biological or chemical agents (either in training or combat): Yes/No

14) Have you ever worked on a HAZMAT team? Yes/No

15) Other than medications for breathing and lung problems, heart trouble, blood pressure, and seizures mentioned earlier in this questionnaire, are you taking any other medications for any reason (including over-the-counter medications): Yes/No

If "yes," name the medications if you know them:_____

16) Will you be using any of the following items with your respirator(s)?

(a) HEPA Filters: Yes/No

(b) Canisters (for example, gas masks): Yes/No

(c) Cartridges: Yes/No

17) How often are you expected to use the respirator(s) (circle "yes" or "no" for all answers that apply to you)?

(a) Escape only (no rescue): Yes/No

(b) Emergency rescue only: Yes/No

(c) Less than 5 hours **per week:** Yes/No

(d) Less than 2 hours **per day:** Yes/No

(e) 2 to 4 hours per day: Yes/No

(f) Over 4 hours per day: Yes/No

18) During the period you are using the respirator(s), is your work effort:

(a) **Light** (less than 200 kcal per hour): Yes/No

If "yes," how long does this period last during the average shift:___hrs._____mins.

Examples of a light work effort are **sitting** while writing, typing, drafting, or performing light assembly work; or **standing** while operating a drill press (1-3 lbs.) or controlling machines.

(b) **Moderate** (200 to 350 kcal per hour): Yes/No

If "yes," how long does this period last during the average shift:___hrs._____mins.

Examples of moderate work effort are **sitting** while nailing or filing; **driving** a truck or bus in urban traffic; **standing** while drilling, nailing, performing assembly work, or transferring a moderate load (about 35 lbs.) at trunk level; **walking** on a level surface about 2 mph or down a 5-degree grade about 3 mph; or **pushing** a wheelbarrow with a heavy load (about 100 lbs.) on a level surface.

(c) **Heavy** (above 350 kcal per hour): Yes/No

If "yes," how long does this period last during the average shift:___hrs._____mins.

Examples of heavy work are **lifting** a heavy load (about 50 lbs.) from the floor to your waist or shoulder; working on a loading dock; **shoveling; standing** while bricklaying or chipping castings; **walking** up an 8-degree grade about 2 mph; climbing stairs with a heavy load (about 50 lbs.).

19) Will you be wearing protective clothing and/or equipment (other than the respirator) when you're using your respirator: Yes/No

If "yes," describe this protective clothing and/or equipment:

_____

21) Will you be working under hot conditions (temperature exceeding 77 deg. F): Yes/No

22) Will you be working under humid conditions: Yes/No

23) Describe the work you'll be doing while you're using your respirator(s):

_____

25) Describe any special or hazardous conditions you might encounter when you're using your respirator(s) (for example, confined spaces, life-threatening gases):

_____

27) Provide the following information, if you know it, for each toxic substance that you'll be exposed to when you're using your respirator(s):

(a) Name of the first toxic substance:_____
Estimated maximum exposure level per shift:_____
Duration of exposure per shift:_____

(b) Name of the second toxic substance:_____
Estimated maximum exposure level per shift:_____
Duration of exposure per shift:_____

(c) Name of the third toxic substance: _____
Estimated maximum exposure level per shift:_____
Duration of exposure per shift:_____

(d) The name of any other toxic substances that you'll be exposed to while using your respirator:

_____

_____

_____

28) Describe any special responsibilities you'll have while using your respirator(s) that may affect the safety and well-being of others (for example: rescue, security):

_____

_____

RESPIRATOR INSPECTION RECORD	APPENDIX 29C	
	EFFECTIVE DATE January 3, 2022	PAGE 1of 1

Type of respirator – _____

Inspected by_____Date of Inspection_____

Reason for inspection-check one: Before each use____ During cleaning____

Inspection Time: Before each use_____AM / PM

During cleaning_____AM / PM

Respirator function: Functioning properly_____ Removed from service___

Positive and Negative User Seal Checks: Pass_____Fail_____

Check of elastomeric parts for pliability and signs of deterioration: OK____Not OK____

Note the number of squeezes until the dilute solution is detected. (Tasted) _____

CHECK THE RESPIRATOR THOROUGHLY FOR ANY DEFECTS FOUND IN THE FOLLOWING COMPONENTS. DEFECTS FOUND WILL RESULT IN REMOVING THE RESPIRATOR FROM SERVICE UNTIL THE APPROPRIATE REPAIRS ARE MADE. FOLLOW MANUFACTURER'S RECOMMENDATIONS.

	BEFORE USE		DURING CLEANING	
Respirator Parts	**No Defects Found**	**Removed from Service Date**	**No Defects Found**	**Removed from Service Date**
Face piece				
Inhalation Valve				
Exhalation Valve				
Headbands				
Cartridge Holder				
Cartridge/Canister				
Filter				
Harness Assembly				
Hose Assembly				
Speaking Diaphragm				
Gaskets				
Connections				
Other Defects				

RESPIRATOR FIT TEST FORM	APPENDIX 29D	
	Effective Date **April 1st, 2009** (Revision No. 1- 03-01- 2013)	**Page** **1 of 1**

Employee Name	**Region**	**Area**	**Job Title**	**Date Issued**

Respirator Type	**Manufacturer**	**Model**	**Size**	**NIOSH Approval**
❑ Particulate Filter	❑ MOLDEX	❑ 2300N95 ❑ 2301N95	❑ Med/Large ❑ Small	❑ 84A-0328 ❑ 84A-2455

Application: Grinding, Chipping, Sawing, Jack Hammering and/or any dust generating operations for the protection against total dust and silica exposures

Limitations	❑ Beard	❑ Denture	❑ Glasses	❑ None

Other Explain:

Fitting	❑ Satisfactory Qualitative Saccharin/Bitter Fit Test
	❑ Satisfactory Positive Pressure Fit Check Test
	❑ Satisfactory Negative Pressure Fit Check Test

Instructions for Use Reviewed:	❑ Donning and Removal	❑ Storage / Replacement

3M FT-30 Qualitative Fit Test Protocol		Trial 1			
Fit Test		Pass	Fail		
MINIMUM OF ONE MINUTE PER EVOLUTION	1. Breathe Normally				
	2. Breathe Deeply				
	3. Turn Head Side to Side				
	4. Nod Head Up and Down				
	5. Recite Rainbow Passage (Talking)				
	6. Bend Over				
	7. Breathe Normally				
	8. Detection of Agent				

The Rainbow Passage

When the sunlight strikes raindrops in the air, they act as a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond his reach, his friends say he is looking for the pot of gold at the end of the rainbow.

FIT TESTING CONDUCTED IN COMPLIANCE WITH OSHA STANDARD 1910.134 (F)

Approval Signature	**Date**
Employee Signature	**Date**

1.0 SCOPE

This program sets the minimum requirements for occupational safety and health training and education for all employees at SIMON. The program is inclusive of specific training that is required to be conducted by SIMON personnel, the Safety Department, and courses required to be attended by employees.

2.0 PURPOSE

The purpose of this program is to provide clear criteria for all SIMON personnel so they will know what is required of them in regards to safety and health training and education at SIMON.

3.0 ORIENTATION

All new-hires must complete new-hire safety orientation. This general safety orientation will be completed by the SIMON Safety Department at the time of hire. This safety orientation must be completed prior to the placement of any employee in the work environment. A 30, 60, and 90 day evaluation will be completed and turned into Human Resources.

4.0 TOOL-BOX MEETINGS

All Supervisory personnel in the following positions **(Foreman, Superintendent, Project Engineer, Project Manager, Construction Manager, Surveying, and Estimating)** are required to conduct a tool-box meeting once per week by themselves, or with all direct reports including themselves. The SIMON Safety Department will generate topics to be discussed and will send them out to applicable personnel on a monthly basis, one per week. Personnel conducting the tool-box meeting must utilize the material on the pre-printed tool-box meeting for general subject matter, and additionally discuss other pertinent and relevant safety topics pertaining to their job. Additional items discussed must be documented on the attendance roster. The Supervisor is required to have all employees on his/her crew print and sign the attendance roster. Then the Supervisor must print, sign, and date the attendance roster in the Supervisor section. The attendance roster must then be turned directly into the SIMON Safety Department. Records of tool-box meetings conducted will be maintained by the SIMON Safety Department.

5.0 SPECIALIZED JOB-SPECIFIC SAFETY TRAINING

On occasion, safety training may be required on a job-site, at a plant, etc. because of inherent risks associated with the work (e.g. - working over water at 40 feet in the air), or due to OSHA mandated training requirements (e.g. - Lead Work), or when the Supervisor-in-charge requests training (e.g. - will be operating a new type of mobile equipment), or when deemed necessary by the Area Manager, Regional Manager, and/or Safety Department. This training is typically completed by the Safety Department, and sometimes by an outside vendor, equipment supplier, etc. This training will be documented and the documentation will be maintained in the Safety Department.

6.0 REQUIRED SAFETY TRAINING COURSES

Specific safety training courses are completed at SIMON so that employees can perform their job in a safe manner, and also because SIMON is required to meet OSHA regulations and state-specific safety requirements. The training courses and personnel training requirements are as follows:

6.1 Aerial Lift Qualification. This course is required to be taken by any employee operating an aerial lift (e.g. - JLG Lift). The training is generally conducted during the winter training season and as needed at other times. Refresher training is required every 3 years.

6.2 ATSSA Supervisor 16-Hour Work Zone and Traffic Control Course. This course should be taken by SIMON Supervisory personnel who perform a significant portion of their work activities in traffic. The Area Manager in conjunction with the SIMON Safety Department determine who is required to take this course. This training course is conducted during the winter training season, and re-certification is every 5 years.

6.3 TSSA Technician 8-Hour Work Zone and Traffic Control Course. This course should be taken by all SIMON Supervisory personnel that perform work operations in traffic, including project engineers. This training course is conducted during the winter training season, and re-certification is every 5 years.

6.4 Confined Spaces- 8 Hours. This course is required to be taken by all Supervisors and employees who perform work in confined spaces and permit-required confined spaces. This training course is conducted during the winter training season. Refresher training will be conducted as deemed necessary by the Area Manager.

6.5 Crane Operator Training (CCO). Refer to Section 10 **(CRANES)** of this manual for crane operator training requirements.

6.6 Crane Signalman. This course must be taken by employees who are to signal a crane. Employees must have taken the course prior to signaling any crane.

6.7 Defensive Driver Training – 8 Hours. This defensive driver course is required to be taken by all employees assigned to drive a company vehicle, drivers of commercial motor vehicles, and those deemed necessary by the Area Manager or Regional Manager. It is also required for those who have had a vehicle accident while operating a company vehicle. This training course is conducted during the winter training season.

6.8 Excavation and Trenching – 8 Hours. This course must be taken by all Supervisors and employees who perform excavation and trenching work. This training course is conducted during the winter training season. Refresher training will be conducted as deemed necessary by the Area Manager.

6.9 Fall Protection - 2 Hours. This course must be taken by all employees who are exposed to 4 feet or more falls in a plant or shop environment, and for employees exposed to 6 feet or more falls on the construction jobs. This training course is conducted by the SIMON Safety Department on an as needed basis. Employees are not permitted to work at heights in excess of the 4 feet or 6 feet requirements until they have received the training. Refresher training will be conducted as deemed necessary by the Area Manager.

6.10 First-Aid/CPR Certification. This course is required for all Foremen and Superintendents. In addition, all crews must have one person on the crew certified and on-the-job at all times. This course is taught during the winter training season, and re-certification is every two years.

6.11 Forklift Operator Certification. Any employee operating a forklift (rough terrain or industrial) must be forklift operator certified. This course is taught during the winter training season, and re-certification is every three years.

6.12 Flagger Certification. Any employee required to flag traffic is required to complete this course. This course is taught during the winter training season, and re-certification is every three years, or as required by the state specific regulations the employee is flagging in.

6.13 MSHA Training - 24- Hour New Miner, and 8-Hour Refresher. Any employee working in an MSHA environment must have completed the 24-hour new miner training. This must be completed one time and is completed at the time of hire, and or prior to the commencement of work on a mine-site. Once the new-miner training is completed the employee must complete an 8-hour refresher course annually. The refresher course is taught during the winter training season, and is an annual requirement.

6.14 OSHA 10-Hour Course. All Supervisory personnel are required to complete the OSHA 10-Hour Construction Certification Course. Other key personnel are required to complete the course as required by the Area Manager/SIMON Safety Department. This course is taught during the winter training season, and re-certification is every 6 years.

6.15 Rigging Course - 8-Hours. This course must be taken by all Supervisors and employees who perform rigging operations on a regular basis (regular basis means at least one time per week). For crane work, employees are not permitted to rig until taking this course. This training course is conducted during the winter training season. Refresher training will be conducted as deemed necessary by the Area Manager.

6.16 Scaffolding. This course must be taken by all Supervisors and employees who perform work on scaffolding. This training course is conducted during the winter training season. Refresher training will be conducted as deemed necessary by the Area Manager.

SAFETY INSPECTIONS	SECTION 31	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This section is inclusive of safety inspections that occur internally at SIMON by Supervisors, employees, and the Safety Department, and safety inspections from external sources. This program includes monthly plant safety inspections, monthly shop safety inspections, weekly job-site safety inspections, insurance carrier inspections, external inspections, and SIMON Safety Department inspections. This section does not include OSHA, MSHA, or other government agency compliance inspections.

2.0 PURPOSE

The purpose of this section is to provide clear required criteria as to what SIMON Supervisory personnel and employee responsibilities are when it comes to safety inspections of their work area. The safety inspections included in this section are conducted by SIMON Supervisory personnel, SIMON employees, the SIMON Safety Department, SIMON' insurance carrier, and external inspectors (owners' representatives, owners' insurance carriers, general contractors, Construction Managers, etc.).

3.0 ROUTINE UNDOCUMENTED SUPERVISOR AND EMPLOYEE WORK AREA SAFETY INSPECTIONS

All Simon Contractor's Supervisory personnel and employees are required to routinely (daily- meaning always on the "look-out") inspect their work area for safety compliance while performing daily job duties. While performing these routine safety inspections, it is required that all safety deficiencies be corrected immediately to ensure the safety of SIMON employees. If a safety deficiency is unable to be immediately corrected, the SIMON Supervisor-in-charge must correct the deficiency in a timely manner. At no time shall a SIMON employee be put in a safety deficient area until the deficiency is corrected. These routine inspections do not have to be documented.

4.0 MONTHLY PLANT SAFETY INSPECTION

Plant Foremen or designee(s) are required to conduct a written safety inspection of the entire plant facility on a monthly basis. This safety inspection must be documented. While conducting the inspection, deficiencies must be noted on the inspection checklist, corrective actions must be taken, and corrective actions must be noted in writing on the form. Once completed, the safety inspection checklist must be submitted to the SIMON Safety Department. It is important to note in this section that the Monthly Plant Safety Inspection Checklist is not required to be done when the plant is in a scheduled shut-down during winter months.

5.0 MONTHLY SHOP SAFETY INSPECTION

Reserved for future use

6.0 WEEKLY JOB-SITE SAFETY INSPECTION

Construction Foremen or designee(s) are required to conduct a written safety inspection of their entire work operation on a weekly basis. This safety inspection must be documented. While conducting the inspection, deficiencies must be noted on the inspection checklist, corrective action must be taken, and corrective actions must be noted in writing on the form. Once completed, the safety inspection checklist must be submitted to the SIMON Safety Department. It is important to note in this section that the weekly safety inspections are not required to be done when the crew is shut-down during the winter months. The Superintendent must complete the weekly safety inspection report if he is the only Supervisor on the job and/or project.

7.0 SIMON' INSURANCE CARRIER SAFETY INSPECTIONS

SIMON' insurance carrier will conduct periodic safety inspections of SIMON work operations. When the insurance carrier does this, the loss control representative will write an inspection report and submit it to the SIMON safety director. When this is done, the SIMON safety director will forward it to the Area Manager in charge of the work operation which was inspected. The Area Manager is required to provide a written response with corrective actions to all deficiencies noted within one week, and send it back to the SIMON Safety Director. The SIMON Safety Director will then return the inspection report back to the insurance carrier loss control representative.

8.0 EXTERNAL SAFETY INSPECTIONS

Periodically, owners' representatives, owners' insurance carriers, general contractors, Construction Managers, etc., will conduct safety inspections of SIMON work operations. When this occurs and a safety inspection report is submitted to SIMON Supervisory personnel, the most senior Supervisor-in-charge is required to provide a written response (if corrective measures are warranted) to the party who performed the inspection. The written response must be in a timely manner and include corrective actions to deficiencies noted. A courtesy copy must be provided to the SIMON Safety Department.

9.0 SIMON SAFETY DEPARTMENT INSPECTIONS

The SIMON Safety Department will periodically generate a Written Safety Inspection Report upon inspecting a work operation. At the time of inspection, the Safety Inspection Report will be reviewed with the SIMON Supervisor-in-charge, and the Supervisor will be required to sign and date the report at the time of inspection. A copy of the report will be left with the Supervisor, and the Supervisor is required to note in writing his corrective actions taken, initial the corrective action(s), and date them. The report must be completed with corrective actions and submitted back to the SIMON Safety Department representative within 5 business days.

10.0 EQUIPMENT INSPECTIONS

It is company policy that all equipment must be inspected prior to use. It is also expected that if something is wrong with the equipment, the employee marking the inspection reports it to his/her Supervisor so that appropriate action can be taken to bring the equipment into compliance with company safety standards.

SANITATION	SECTION 32	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This section sets forth the minimum requirements for ensuring sanitary conditions specifically in regards to drinking water, non-potable water, and eating/drinking areas. This section encompasses the requirements of OSHA 29 CFR 1926.51, Subpart D- Sanitation.

2.0 PURPOSE

The purpose of this section is to provide technical information to SIMON Supervisory personnel so Supervisors can ensure a healthy work environment by putting required measures in place with regard to drinking water, non-potable water, toilet facilities, and eating and drinking areas.

3.0 GENERAL REQUIREMENT

The SIMON Supervisor-in-charge is responsible for ensuring compliance with all aspects of this program.

4.0 DRINKING WATER

An adequate supply of drinking water must be in place at all job-sites, plants, and shops. SIMON employees must have readily-available access to the drinking water. Specific requirements in regards to drinking water are as follows:

4.1 Portable containers (cooler) used to dispense drinking water must be capable of being tightly closed, kept that way while dispensing water, and equipped with a tap.

4.2 Portable containers used to dispense drinking water must be clearly marked as "DRINKING WATER".

4.3 Portable containers must be filled with fresh drinking water daily and at the start of each work shift.

4.4 A common drinking cup is prohibited.

4.5 When single-use disposable cups are used there must be a trash receptacle in place for the proper disposal of the cups.

4.6 Portable containers must be cleaned/sanitized daily. In addition, employees must wash hands/arms prior to handling any portable container during cleaning/sanitizing.

4.7 Spooning or ladling of drinking water from a common source is not permitted

5.0 NON-POTABLE WATER

Outlets for non-potable water (non-drinking water) must be identified by a sign and/or clearly labeled to indicate that the water is unsafe and is not to be used for drinking, washing, or cooking purposes.

6.0 TOILETS/HANDWASHING FACILITIES

6.1 Number of Toilets. Where portable toilets must be provided at construction job-sites and where the SIMON Supervisor-in-charge determines it to be necessary for employees, the OSHA requirements for the required number of toilets are as follows:

NO.	Number of Employees	Minimum Number of Facilities
1.	20 or less	1
2.	20 or more	1 toilet and 1 urinal per 40 workers
3.	200 or more	1 toilet and 1 urinal per 50 workers

6.2 Portable Toilet Cleaning. Cleaning of toilet facilities must be in accordance with the toilet supplier's cleaning requirements and/or schedule, and as often as necessary to keep them clean and orderly.

6.3 Job Office Toilet Cleaning. Cleaning of job office toilets must be periodically cleaned to ensure a healthy work environment. A cleaning schedule must be determined by the SIMON Supervisor-in-charge.

6.4 Additional Portable Toilets. The number of toilets in the table in heading 6.1 is the minimum as required by OSHA. Additional units may be necessary to provide adequate sanitation or convenience to crews in outlying areas.

6.5 Hand Cleaning. At a minimum, SIMON fixed facilities and construction jobs must have hand-washing facilities. If running water is unavailable, then hand sanitizer or a hand sanitizing dispenser is acceptable. Typically port-o-pots are equipped with hand sanitizing dispensers and can be rented this way.

7.0 EATING AND DRINKING AREAS

Employees are not permitted to consume food or beverages in an area where toxic materials are present. An example of this is where Lead Paint Work is taking place.

SCAFFOLDING	SECTION 33	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 4

1.0 SCOPE

This section sets the minimum general requirements for scaffolding safety as specified in OSHA 29 CFR 1926, Subpart L- Scaffolding. This section also sets the minimum requirements for specific types of scaffolding, which are as follows: stair towers, rolling towers, and welded frame scaffolding. Additionally, this section identifies SIMON employee training requirements as specified in OSHA's subpart L. This program does not include requirements for any other type of scaffolding outside of what is identified in this paragraph.

2.0 PURPOSE

The purpose of this scaffold program is to provide technical safety information and requirements for scaffolding, so that SIMON Supervisory personnel can meet the requirements of OSHA 29 CFR 1926, Subpart L- Scaffolding and ensure the safety of their employees.

3.0 DEFINITIONS

Competent Person: A SIMON Supervisor who knows the requirements of this program, the manufacturer's requirements of the scaffolding he/she is working with. This SIMON Supervisor will also be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees. This SIMON Supervisor does have the authority to take prompt corrective action to ensure the work pertaining to scaffoldings is safe. In addition, the SIMON Supervisor overseeing the scaffold work is the competent person.

Guardrail System: A vertical barrier consisting of, but not limited to: top rails, midrails, toeboards, and posts, erected to prevent employees from falling off of a scaffold platform or walkway to lower levels. A properly installed x-brace is either considered a top rail or a midrail.

Maximum Intended Load: The total load of all persons, equipment, tools, materials, transmitted loads, and other loads reasonably anticipated to be applied to a scaffold or scaffold component at any one time.

Rolling Tower Scaffolding: An unpowered, portable, caster- or wheel-mounted supported scaffold.

Stair Tower Scaffolding: A tower comprised of scaffold components and which contains internal stair units and rest platforms.

Tubular Welded Frame Scaffolding: A scaffold consisting of a platform(s) supported on fabricated end frames with integral posts, horizontal bearers, and intermediate members (x-braces).

4.0 GENERAL REQUIREMENTS

4.1 4:1 Safety Factor. Each scaffold and scaffold component must be capable of supporting, without failure, its own weight and at least 4 times the maximum intended load applied or transmitted to it.

4.2 14-Inches to Work. The front face of the scaffolding must be 14 inches from the face of the work, unless guardrail systems are erected along the front edge and/or a personal fall arrest system is in place where fall exposures are greater than or equal to 6 feet.

4.3 Access. Access ladders must be provided for each scaffold. End frame supports may not be used for access/egress, unless the support is designed with a ladder end (meaning that the ladder is built into the frame).

4.4 Damaged Scaffolding. Any scaffold damaged or weakened from any cause must be immediately removed from service.

4.5 Fall Protection. The SIMON Supervisor-in-charge must ensure that at any location employees must meet all of the fall protection requirements in Section 13 **(FALL PROTECTION)** of this manual. Employees must comply with SIMON 100% fall protection policy during erection, dismantling, and work operations for heights greater than or equal to 6 feet. If the most senior SIMON Supervisor-in-charge believes that 100% fall protection is not feasible, then

he/she must consult with the SIMON Safety Department, and request a variance of SIMON' 100% fall protection policy.

4.6 Guardrails. Guardrails, midrails, and toeboards must be installed on all open sides of scaffolds more than 6 feet in height. Guardrails used on scaffolding must meet the guardrail requirements in Section 13 **(FALL PROTECTION)** of this manual. However, there is one exception to this; an x-brace can be substituted for either a top rail (must x between 38 to 48 inches) or a midrail (must x between 20 to 30 inches).

4.7 Scaffold Inspection. Scaffolds must be inspected daily by the SIMON Supervisor or designee. Any deficient condition must be corrected immediately. Scaffolds must be taken out of service if a deficiency cannot be fixed or repaired immediately. If a scaffold is being taken out of service, it is required to be tagged out service by the SIMON Supervisor. While the tag is in place the scaffold cannot be used. Only the SIMON Supervisor can remove the tag after the deficiency(s) has been corrected.

4.8 Intermixing of Scaffold Components. Intermixing of different manufacturers' scaffolding components is not permitted.

4.9 Manufacturer's Requirements. Scaffolding set-up, take down, and use must comply with all manufacturer's requirements.

4.10 Mud Sills. Mud sills must be used under level scaffolds to prevent the integrity of the scaffolds stability from being compromised by soft footings.

4.11 Opaque Finishes on Platforms or Planks. Opaque finishes on planks or platforms are not permitted.

4.12 Overhead Protection. Overhead protection is required if employees working on scaffolds are exposed to overhead hazards. This protection must be 2 inches thick or equivalent.

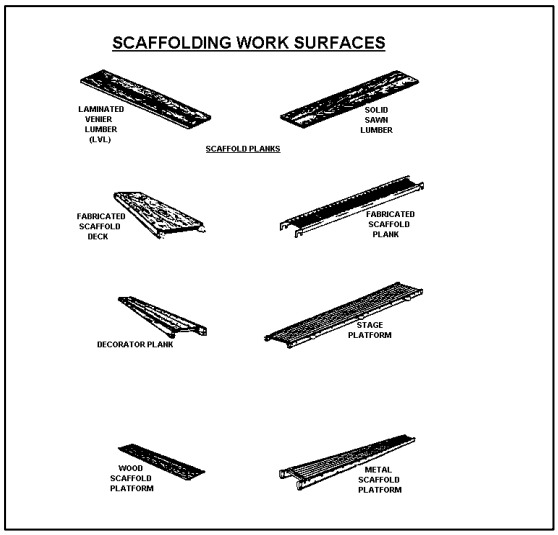
4.13 Overloading. Do not load scaffolds in excess of the load for which they are intended.

4.14 Planking Overlap. A scaffolding plank must extend at least 6 inches and not greater than 12 inches over its end support.

4.15 Planks Abutting. Where scaffold planks abut or overlap, each plank must rest on a support surface. Where overlapping occurs it must be at least 12 inches of overlap.

4.16 Plank Inspection. All planks must be inspected by the SIMON Supervisor or designee before each use. Damaged planks must be discarded immediately.

4.17 Plank of Scaffold Board. Wooden or composite boards used for walk/platform boards must be scaffold grade and stamped with "OSHA". Refer to the diagram below which shows acceptable planks and scaffold boards.



4.18 Screw jacks. Screw jack height adjustments cannot exceed 12 inches, unless they are within a manufacturer's specifications. Screw jacks and base plates must always be in place and properly fastened and secured.

4.19 Working Platform. Each platform on all working levels must be fully planked or decked between the front uprights and the guardrail supports. This does not apply during the scaffold erection and dismantling process.

5.0 EMPLOYEE TRAINING REQUIREMENTS

Employee scaffold training will be conducted on a job-by-job basis where employees will be utilizing scaffolding. The training is required, and the SIMON Supervisor is required to contact the SIMON Safety Department to schedule the training. The training will be conducted by the SIMON Safety Department as needed, when refresher training is warranted, and when requested by the SIMON Supervisor-in-charge. The training will include the following:

5.1 Electrical hazards and avoidance measures.

5.2 Fall hazards and appropriate protective measures.

5.3 The dangers of falling objects in the work area and the steps necessary to provide protection.

5.4 The proper use of the scaffold and proper material handling on the scaffold

5.5 The maximum intended load and the load-carrying capacities of the scaffold used.

5.6 The nature of scaffold hazards, correct procedure for performing the work, design criteria, load-carrying capacity, and intended use.

5.7 Scaffold training must be conducted at least annually.

6.0 STAIR TOWER REQUIREMENTS

6.1 125 Feet-Rule. Drawings and specifications for all welded frame scaffolds over 125 feet in height above the baseplates must be designed by a registered professional engineer.

6.2 Bracing. Cross-bracing, x-braces, or diagonal bracing will be properly braced for securing vertical members together laterally, and the cross braces will be of such length as will automatically square and align vertical members so that the erected scaffold is always plumb, square, and rigid. This means that all x-braces must be the same size. Also, all brace connections must be made secure.

6.3 General Requirements. All general requirements above in heading 4.0 must be met.

6.4 Securing the Stair Tower. The stair tower must be secured to prevent it from coming over, per the manufacturer's requirements.

6.5 Stair rails and Handrails. Stair rails, handrails, and steps must comply with all aspects of OSHA subpart L, and Section 13 **(FALL PROTECTION)** of this manual.

7.0 ROLLING TOWER REQUIREMENTS

7.1 Bracing. Cross-bracing, x-braces, or diagonal bracing will be properly braced for securing vertical members together laterally, and the cross braces will be of such length as will automatically square and align vertical members so that the erected scaffold is always plumb, square, and rigid. This means that all x-braces must be the same size. Also, all brace connections must be made secure.

7.2 Casters. Casters must be properly designed for strength and dimension to support 4 times the maximum intended load. All casters must have a fully functional positive locking device to hold the scaffold in position.

7.3 General Requirements. All general requirements above in heading 4.0 must be met.

7.4 Maximum Tower Height. The height of a rolling scaffold must not exceed 4 times the minimum base dimension including the attached outriggers.

7.5 Moving a Rolling Tower. When moving a tower, the force necessary to move the mobile scaffold must be applied near or as close to the base as practical (in no case higher than 5 feet from the bottom), and provision will be made to stabilize the tower during movement from one location to another. Scaffolds will only be moved on level floors, free of obstructions and openings.

7.6 Riding on Rolling Towers. Employees are not permitted to ride on rolling scaffold towers.

8.0 WELDED FRAME SCAFFOLDING REQUIREMENTS

8.1 125 Feet-Rule. Drawings and specifications for all welded frame scaffolds over 125 feet in height above the baseplates must be designed by a registered professional engineer.

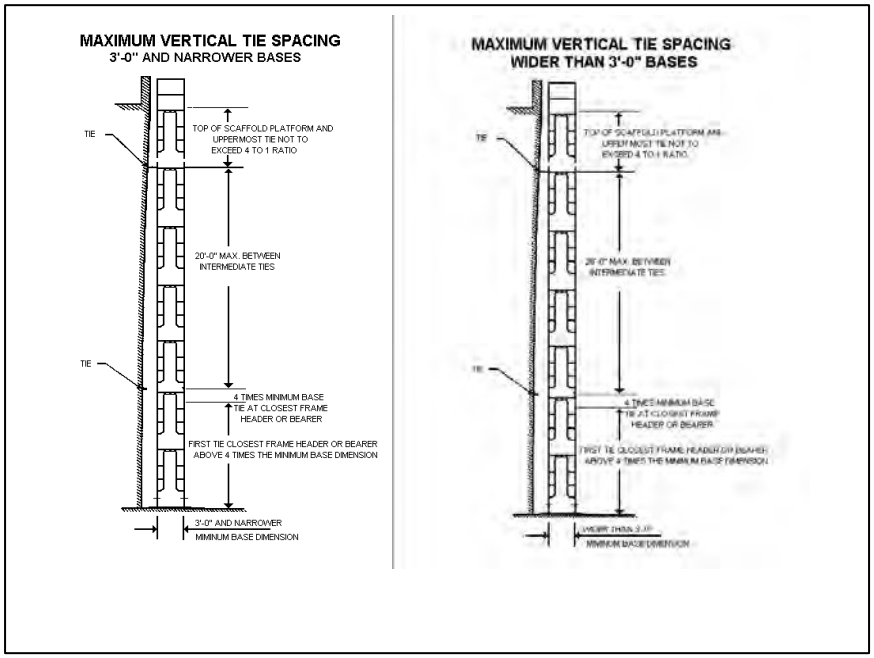
8.2 Bracing. Cross-bracing, x-braces, or diagonal bracing will be properly braced for securing vertical members together laterally, and the cross braces will be of such length as will automatically square and align vertical members so that

the erected scaffold is always plumb, square, and rigid. This means that all x-braces must be the same size. Also, all brace connections must be made secure.

8.3 End Frames for Foundation Not Permitted. End frames are not permitted to be the foundation. There must be screw jacks w/base plates.

8.4 General Requirements. All general requirements above in heading 4.0 must be met.

8.5 Securing and Bracing. Guys, ties, and bracing must be installed according to the scaffold manufacturer's specifications, or at the closest horizontal member to the 4:1 height ratio and be repeated vertically at locations of horizontal members every 20 feet or less thereafter for scaffolds 3 feet wide or less, and every 26 feet or less thereafter for scaffolds greater than 3 feet wide. The top guy, tie or brace of completed scaffolds must be placed no further than the 4:1 height from the top. Guys, ties, and braces must be installed at each end of the scaffold and at horizontal intervals not to exceed 30 feet- measured from one end (not both) towards the other. Refer to the diagram below:



8.6 Windy Conditions. When welded frame scaffolds are tarped, meshed, or screened in, every consideration must be given to the fact that this could create a "sail" condition where it could carry the scaffold over when windy conditions exist. The SIMON Supervisor must ensure proper securing of the scaffold required in heading 8.5 above. Also, additional securing measures may be required.

9.0 ANY OTHER SCAFFOLDING NOT IDENTIFIED IN THIS PROGRAM

(RESERVED FOR FUTURE USE)

If any SIMON Supervisor is considering or is planning on utilizing any scaffolding not identified in this program, then he/she must contact the Safety Department to obtain the OSHA specific requirements. The SIMON Safety Department will provide technical assistance to the SIMON Supervisor-in-charge to assist with meeting all requirements of OSHA 29 CFR 1926, Subpart L- SCAFFOLDING. In addition, all training requirements of OSHA's subpart L will be met prior to the set-up of the scaffolding.

SILICA	SECTION 34	
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1.0 SCOPE

This program sets the minimum required guidelines for SIMON employees working in areas where exposure to Respirable Crystalline Silica occurs. This program outlines required general engineering controls to be utilized by SIMON Supervisory personnel and employees to control silica dust, and employee safety and health requirements when crystalline silica dust levels exceed OSHA Action Levels and Permissible Exposure Levels (PELs), when general engineering controls are not feasible. The requirements of OSHA 29 CFR 1926.1153- Respirable Crystalline Silica are encompassed in this program.

2.0 PURPOSE

The purpose of this program is to provide technical information on crystalline silica exposure, general engineering controls to eliminate or minimize crystalline silica dust, required safe work practices, employee medical surveillance criteria, and the minimum safety and health requirements for SIMON Supervisory personnel to implement.

3.0 DEFINITIONS

Competent Person: For the purposes of this program, the SIMON Supervisor-in-charge is the designated competent person. The SIMON Supervisor will be capable of identifying existing and predictable hazards in the surroundings, or work conditions which are unsanitary, hazardous, or dangerous to employees, and the SIMON Supervisor does have the authority to take prompt corrective action to ensure the work pertaining to silica exposure or potential silica exposure is safe for employees and in accordance with this program. As part of this program, employees must be able to identify the competent person.

Engineering Controls: Engineering controls are controls used to minimize, mitigate, or eliminate the crystalline silica dust in the air from the point of operation. The number one way to eliminate silica dust is to introduce water into the point of operation. Another way of eliminating the dust is to use a vacuum extraction system which captures the dust at the point of operation—for example, a hand-held grinder with a vacuum system.

Health Effects: Overexposure to crystalline silica dust can cause scar tissue to form in the lungs, which reduces the lungs' ability to absorb oxygen from the air we breathe. This disease is called silicosis.

Permissible Exposure Level: The OSHA 8-hour allowable Permissible Exposure Level (PEL) is 50 micrograms per cubic meter. This is the amount of respirable silica dust permitted in air that an employee can be exposed to without adverse health effects.

Silica: The most common mineral in the earth's crust and is a major component of sand, rock, and mineral ores. When breathed above the OSHA Permissible Exposure Levels (PELs), it can create short-term and long-term health effects, primarily with the respiratory system.

Silicosis: Silicosis is a disabling, nonreversible and sometimes fatal lung disease caused by an overexposure to respirable crystalline silica dust. Respirable refers to dust particles that are five microns in size or less (twenty times smaller than the human hair). Respirable dust passes through the human body's filtration system in the nose and upper respiratory tract, and migrates into the lungs because of its small size. Continuous exposure above the OSHA PELs may result in the following symptoms: shortness of breath following physical exertion, fatigue, loss of appetite, severe cough, chest pain, fever, and night sweats.

4.0 CRYSTALLINE SILICA DUST-PRODUCING ACTIVITIES

4.1 Crystalline Silica Presence in Products. Crystalline silica is present as a mineral in the following products: concrete products, masonry products, sand, and most stone products. Anytime dust is generated from these silica sources in a work area, a respiratory hazard may exist to SIMON employees.

4.2 Crystalline Silica Dust-Generating Activities. The following are examples of silica dust-generating activities, (recognizing that this list is not inclusive of every possible activity that may generate silica dust): jack hammering

concrete, drilling into concrete or silica containing aggregate, saw cutting concrete, vermeering concrete, mixing cement, sandblasting, power-brooming concrete dust, grinding concrete, milling asphalt, and concrete demolition work.

5.0 SIMON SUPERVISORY RESPONSIBILITIES

The first responsibility of the SIMON Supervisor is to engineer out the silica dust. Engineering controls are defined above in heading 3.0 of this program. If engineering controls are not feasible, and where respirable silica levels will exceed the OSHA PEL, or when a dust respirator or more restrictive respirator is required, the SIMON Supervisor must ensure that his/her employees are indoctrinated in the respiratory protection program in Section 29 **(RESPIRATORY PROTECTION)** of this manual. Respirators will be required as specified in this program, and specific types of respirators required will be spelled out that are specifically not identified in this program.

6.0 REQUIRED WORK PRACTICES FOR SPECIFIC TASKS

6.1 Mandatory Table of Requirements for Specific Work Tasks. The table below identifies mandatory work practices to be followed for Silica dust producing activities, to include engineering and work practice controls, and required respiratory protection. Anytime a dust respirator or more restrictive respirator is required, all program-related respiratory protection and fit testing requirements must be followed. The same equipment/task may be identified more than once due to variability in permitted engineering and work practice controls.

NO.	Equipment/Task Being Performed	Required Engineering and Work Practice Controls	Required Respiratory Protection Required
1.	**Handheld power saw**	**Equip saw with water. Continuous water to blade required.**	**None**
2.	**Handheld power saw**	**Equip saw with vacuum system.**	**None (no visible dust)** **Dust Respirator (visible dust)**
3.	**Walk-behind saw**	**Equip saw with integrated water delivery system with continuous feed to blade or vacuum system.**	**None**
4.	**Walk-behind saw**	**No water delivery system – when not permitted by a quality control specification.**	**TBD**
5.	**Handheld and stand mounted drills (impact and rotary)**	**Use drill equipped with water delivery system or dust collection system. Use dust collection system in accordance with manufacturer instructions to minimize dust. If hole vacuuming is required, HEPA filtered vacuum is required.**	**None**
6.	**Dowel drilling rigs**	**Use drill equipped with dust collection system. If hole vacuuming is required, HEPA vacuum is required.** **Or, use drill equipped with water delivery system.**	**Dust Respirator, unless determined not required by air testing. If no visible dust, then respiratory protection not required. Operator required to operate within enclosed cab for any drill rig.**

7.	**Jackhammers and handheld powered chipping tools**	**Water delivery system that supplies a continuous stream or spray of water at the point of impact.**	**Dust Respirator, unless determined not required by air testing.**
8.	**Jackhammers and handheld powered chipping tools**	**Use tool equipped with commercially available shroud and dust collection system.**	**Dust Respirator, unless determined not required by air testing.**
9.	**Handheld grinders for all uses except mortar removal**	**Use integrated water delivery system with continuous feed to blade.**	**None**
10.	**Handheld grinders for all uses except mortar removal**	**Use grinder with dust collection system. Dust collector must provide 25 cubic feet per minute of airflow per inch of wheel diameter and include cyclonic pre-separator or filter-cleaning mechanism.**	**Outdoor work- None** **Indoor work- Dust Respirator, unless determined not required by air testing.**
11.	**Milling Machine-Small drivable (less than half-lane)**	**Supplemental water spray system designed to suppress dust combined with surfactant use (as required by surfactant mfr.)**	**None**
NO.	Equipment/Task Being Performed	Required Engineering and Work Practice Controls	Required Respiratory Protection Required
12.	**Milling Machine-Larger drivable (half lane and larger)**	**Equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Or, supplemental water spray system designed to suppress dust coupled with surfactant use (as required by surfactant mfr.)**	**None**
13.	**Hoe-Ramming, rock ripping, and similar earthwork activities.**	**Operate from within an enclosed cab. When employees are outside of cab engaged in tasks on the ground, apply water and/or dust suppressants as necessary to minimize dust.**	**None**
14.	**Vermeer wheel mounted on skid steer**	**Operate from within an enclosed cab. Equip wheel with water delivery system to minimize dust.**	**None**

6.2 Determining Sufficient Water Use. For activities requiring wet methods (water use), water must be at a flow rate sufficient enough to minimize release of visible dust.

6.3 Enclosed Cab Requirements. The door seals and closing mechanisms must work properly. Gaskets and seals must be in good order. Requires Heat and/or Air condition. Intake air must be through a filter that is 95% efficient in the 0.3-10 micrometer range.

6.4 Engineering Controls. Engineering and work practice controls must be used as outlined above unless SIMON can demonstrate that it is not feasible. If Engineering Controls are not feasible, the SIMON Safety Department must be consulted to assist in determining the proper level of respiratory protection.

6.5 Dust Respirator Requirements. For the purposes of this program, dust respirators (dust masks) will be required for all work operations where crystalline silica dust is airborne (means that you have visible dust in the air), unless a more restrictive tight fitting respirator (e.g.- half face or full face) is otherwise specified and required based on sound industrial hygiene judgment or air testing data.

6.6 Sandblasting. Sandblasting operations will require the employee to wear a sand blasting hood with an assigned protection factor of at least 1,000.

7.0 REQUIRED NON-SPECIFIED TASKS IN TABLE

The following monitoring requirements must be met for tasks not identified in the mandatory table in heading 6.1 of this program.

7.1 Air Testing. Air testing must be done to establish the concentration of Silica in the air for non-specified tasks. An outside independent testing firm will be used for these purposes. This testing will be done for representative breathing zone samples. The need for air testing will be determined by the SIMON Safety Department in accordance with prudent industrial hygiene techniques and requirements of OSHA 29 CFR 1910.1001- Table Z-3: MINERAL DUSTS.

7.2 Action Level. The 8-hour action level is 25 micrograms per cubic meter. If the action level is not exceeded with initial monitoring, then no further air testing is required.

7.3 Above Action Level and Below PEL. If initial monitoring is above the action level, but below the PEL, monitoring must be repeated within 6 months of most recent monitoring. Testing must continue every 6 months or until 2 consecutive tests are below the action level, at which time monitoring can discontinue.

7.4 Above PEL. If initial monitoring is above the PEL, then monitoring must be completed every 3 months. If the work activity does not permit engineering controls, then the respiratory protection level will be established and remain constant for all future work.

7.5 Process Changes. Re-monitoring must be done whenever there is a change in the production, process, control equipment, or work practices where a result in new or additional exposure may occur.

7.6 Engineering Controls. Engineering and work practice controls must be used as outlined above unless SIMON can demonstrate that it is not feasible.

7.7 Respiratory Protection. Respiratory protection will be determined on a task basis and case-by-case basis if not specifically identified in heading 6.1 (Table). Dust respirator (dust masks) will be required for all work operations where crystalline silica dust is airborne (means visible dust in the air), unless a more restrictive tight fitting respirator (e.g.- half face or full face) is otherwise specified based on prior air testing data, or when sound industrial hygiene judgment is used..

7.8 Written Notification. Employees will be notified in writing of the results of the air testing. This will be done through the SIMON Safety Department. The Personal Air Quality Monitoring Notification Form found in Appendix 19B will be used.

8.0 EMPLOYEE MEDICAL SURVEILLANCE

Any employee using a respirator or expected to use a respirator for 30 or more days per year where levels are expected to exceed the OSHA Action Level of 25 micrograms per cubic meter, must have a Silica-based medical surveillance. The exam must be completed within 30 days of initial hire and at a minimum of every 3 years thereafter. It may be more often based on recommendation by the PLHCP (Physician or Licensed Health Care Practitioner).

8.1 Physical Exam. The physical will consist of the following:

8.1.1 Medical and Work History. Emphasis on past, present, and future exposure to silica, dust, and other agents that could affect respiratory system.

8.1.2 General History Items.

8.1.3 Exam with Emphasis on Respiratory System.

8.1.4 A Chest X-ray- B Reader. This is for baseline pneumoconiosis.

8.1.5 A Pulmonary Function Test, and Forced Vital Capacity.

8.1.6 Testing for latent Tuberculosis.

8.1.7 Any other tests deemed necessary by the PLHCP.

8.2 SIMON will provide the following to the PLHCP:

8.2.1 Former, current, and anticipated duties as it relates to the employee's occupational exposure to respirable silica. This will be done through occupational job descriptions provided by the company.

8.2.2 Description of respirator, what type(s), and how long employee(s) will wear. This must be done for each specific type of respirator to be worn.

8.2.3 A copy of Silica standard and Respirator physical exam requirements.

8.3 SIMON must receive a written medical opinion from PLHCP within 30 days of exam. The written opinion must include the following: Date of exam, a statement that exam met OSHA requirements, any recommended limitations of use, recommended limitations on exposure to silica, and a statement as to whether or not the employee should see a specialist.

9.0 EMPLOYEE TRAINING

Silica awareness training will be completed periodically by the SIMON Supervisor-in-charge during the weekly tool-box safety meetings. When specific operations warrant extensive silica awareness training and safety procedural training, this will be conducted by the SIMON Safety Department and in accordance with Section 15 **(HAZARD COMMUNICATIONS)** of this manual.

1.0 SCOPE

This section sets the minimum criteria for the protection of employees performing any excavation or demolition work that requires disturbing the earth's surface. Additionally, this section encompasses all of the requirements of the State/Federal One-Call Law and OSHA 29 CFR 1926.652(b) - Underground Installations.

2.0 PURPOSE

This program is to provide technical information to SIMON Supervisory personnel for them to ensure compliance with all aspects of the One-Call Law and OSHA requirements in regards to underground utilities.

3.0 DEFINITIONS (DEFINED BY ONE CALL OF WYOMING)

Business Day: Any day except a Saturday, Sunday, or legal holiday as prescribed by statute. A business day begins at 12 a.m. and ends 11:59:59 p.m.

Complex Project: An excavation that involves more work than properly can be described in a single locate request or any project designated as such by the excavator because of its complexity or its potential to cause significant disruption to lines or facilities and the public, including excavations that require scheduling over an extended time frame. In general, for road work this is no more than 1,000 linear feet, or 1 city/town/borough block.

Demolition Work: The partial or complete destruction of a structure, by any means, served by or adjacent to an underground line or lines.

Designer: Any architect, engineer or other person who prepares a drawing for a construction or other project which requires excavation or demolition work.

Emergency: A sudden or unforeseen occurrence involving a clear and immediate danger to life, property and the environment, including, but not limited to: serious utility breaks or defects in a facility owner's lines.

Excavation Work: The use of powered equipment or explosives in the movement of earth, rock or other material, and includes but is not limited to: anchoring, auguring, backfilling, blasting, boring, digging, ditching, drilling, driving-in, grading, plowing-in, pulling-in, ripping, scraping, trenching and tunneling, but does not include soft excavation technology such as vacuum, high pressure air, or water.

Excavator: Any SIMON employee who performs excavation or demolition work.

Facility Owner: The owner of the utility (e.g. – Black Hills Energy, Dominion Gas, Verizon, or Comcast Cable); this does not include THE STATE/FEDERAL DOT.

Locate Request: A communication between SIMON or designer, and the WY One Call system in which a request for locating facilities is processed.

One Call of Wyoming: The communication system established within the state of Wyoming to provide a single nationwide toll-free telephone number (***811*** for excavators or designers to call facility owners and notify them of their intent to perform excavation, demolition, or similar work as defined by this program).

Powered and Mechanized Equipment: Any equipment energized by an engine or motor and used in excavation or demolition work.

Pre-Con Request: A notification and request to facility owners by the SIMON Supervisor-in-charge of the project regarding a complex project.

Site: The specific place where the excavation or demolition work will occur as identified on the locate request.

Tolerance Zone: The horizontal space within eighteen inches of the outside wall or edge of a line or facility where "HAND DIGGING" or "SOFT EXCAVATION TECHNOLOGY" must occur to locate the utility. Refer to Appendix 35A for a diagram depicting the tolerance zone.

4.0 GENERAL REQUIREMENT BEFORE DIGGING

4.1 Responsibility of Senior SIMON Supervisor-in-charge of Job. The most senior SIMON Supervisor-in-charge of the job site or designee contact One Call of Wyoming. This may be done through the phone service by calling 811, or utilizing the web service at www.onecallofwyoming.com.

4.2 Web Service. Any SIMON employee needing to use the web service must receive the required training and get an assigned password through One Call of Wyoming. Contact the SIMON Safety Department to get this coordinated.

4.3 When to Contact One Call of Wyoming. The SIMON Supervisor or designee is required to contact the One Call of Wyoming system anytime excavation or demolition work will be performed as defined in heading 3.0.

4.4 Prior Notice Required to One Call of Wyoming. The One Call of Wyoming system requires not less than 2 working days' notice and not more than 10 working days advance notice. An example of this is if you call on a Friday in the a.m. hours, the utility owners have until the following Wednesday at 7:00 a.m. to mark out the job-site. If web entry is going to be used, the SIMON employee must go through the training program as required by One Call of Wyoming. To get the training scheduled, the SIMON employee can contact the SIMON Safety Department.

4.5 Info. Required to be given to One Call of Wyoming. The SIMON employee placing the call or web entry must provide all information as required—for example, how long will the excavating occur, what type of equipment will be used to excavate, and what is the exact location where excavating will take place.

4.6 Maximum Area Permitted to be Called In. The maximum area that is permitted to be called in will be determined by the One Call of Wyoming system. If a problem occurs in regards to maximum areas permitted to be called in, then it is the responsibility of the most senior SIMON Supervisor-in-charge to coordinate with the WY One Call system and the locating companies to ensure the project has been appropriately called in.

4.7 White Markings. It is the responsibility of the most senior SIMON Supervisor-in-charge of the job or designee to have all of the proposed dig areas marked with white spray paint to identify to the locators where SIMON will be excavating. This is not required if exact locations can be provided directly to the locator while on-site conducting the mark-out and/or exact locations can be provided to the One Call of Wyoming system during the phone or web notification.

4.8 One Call of Wyoming Ticket. It is the responsibility of the SIMON employee placing the OneCall to obtain a valid One Call of Wyoming Ticket and Number. This must be maintained for the duration of the job.

5.0 MARKING OF UTILITIES

5.1 Type of Markings. The utility locator is required to locate the underground utilities in accordance with The Common Ground Alliance Best Practices for Temporary Markings set forth in ANSI Z535.1. A depiction of these markings are in Appendix 35B of this program.

5.2 Marking Colors. Underground utilities will be marked with the following colors: BLUE- potable water; GREEN- sewer, YELLOW- gas, oil, petroleum, gaseous material, or steam; ORANGE- communications; RED- electric; PURPLE- reclaimed water; and PINK- temporary survey markings. Refer to www.onecallofwyoming.com for a color coding chart, or color coding wallet cards can be picked up from the SIMON Safety Department.

5.3 Privately-Owned Utility Lines. Privately-owned utility lines (e.g. - underground lines at a university or a manufacturing facility) may not be covered by the One Call of Wyoming System. Therefore, it is the responsibility of the most senior SIMON Supervisor or designee to ensure that arrangements have been made with the private utility owner(s) to get the utilities called in to the owner, and request marking.

5.4 Site Inspection before Digging. The SIMON Supervisor-in-charge of the work is required to conduct a visual inspection of the proposed excavation or demolition area for evidence of markings as well as the possibility of unmarked utilities.

5.5 No Markings after 3 Business Days. Under no circumstance is any SIMON employee permitted to dig with powered or mechanized equipment after 3 business days if there is any reason to believe that utilities exist and they have not been marked in the proposed excavation or demolition area, unless due care and prudent techniques are used. This means hand digging or soft excavation technology.

5.6 Confirmation by One Call of Wyoming that Marking is Complete, But Evidence Suggests Otherwise. The SIMON Supervisor is responsible to re-call the One Call of Wyoming system and/or utility owner, and repeat if necessary. Under no circumstance is any SIMON employee permitted to dig with powered or mechanized equipment after 3 business days if there is reason to believe that utilities exist and they have not been marked in the proposed

excavation or demolition area, unless care and prudent techniques are used. This means hand digging or soft excavation technology.

5.7 Faded Marks or Markings. It is an acceptable practice to re-fresh the paint marks on the ground with the appropriate colors. Refreshing must be done directly over top of the existing marks.

5.8 Flags. Color coded flags may be requested to mark out utilities vs. paint marks.

6.0 ONE CALL OF WYOMING TICKET AND MARKINGS

6.1 Valid Dates. A one call of Wyoming ticket and locate marks are valid until SIMON pulls off-site (includes equipment) for more than 2 working days, or when re-marking is needed because the marks are obliterated. If this is the case, then re-contact the one call of Wyoming system as outlined in heading 4.0.

6.2 Subcontractors, Owners, and General Contractors. Subcontractors, owners, and general contractors are not permitted to work on or under a SIMON one call of Wyoming ticket nor is SIMON permitted to work on another party's ticket.

6.3 Renting Out Equipment or Operator. SIMON must have a valid one call of Wyoming ticket anytime an operator with a piece of equipment, or an operator is rented out to perform excavation work. SIMON is not permitted to work off of another contractor's ticket.

7.0 EXCAVATING AND DEMOLITION AROUND UTILITIES

Hand digging or other means of soft excavation technology must be done anytime a SIMON employee is digging within 18 inches on either side of the marked location of an underground line. The SIMON employees are required to expose the extremities of where the utility line may be impacted. Refer to Appendix 35A of this program for diagrams depicting the tolerance zone. While an excavation is open, underground utilities must be protected, supported, or removed as necessary to ensure the safety of SIMON employees.

8.0 UTILITY STRIKE

8.1 Accident-Incident Report. It is the responsibility of the SIMON Supervisor to immediately notify the SIMON Safety Department when a utility is hit on his/her job. Whether or not the utility was marked, the Supervisor must complete the Accident-Incident report form in Appendix 5A of this manual**.** Pictures of the marking, lack of markings, or improper markings must be taken showing distances on the photos. For example, if the marks were 10 feet away from the utility, then pictures need to be taken with a tape measure laying on the ground showing the mark was "10 feet away".

8.2 Emergency Situation. If an emergency situation occurs as a result of a utility strike, it is the responsibility of the SIMON Supervisor to ensure the safety of his employees, contact the 911 system, contact the utility owner, and then contact the SIMON Safety Department as soon as possible.

TOLERANCE ZONE	SECTION 35A	
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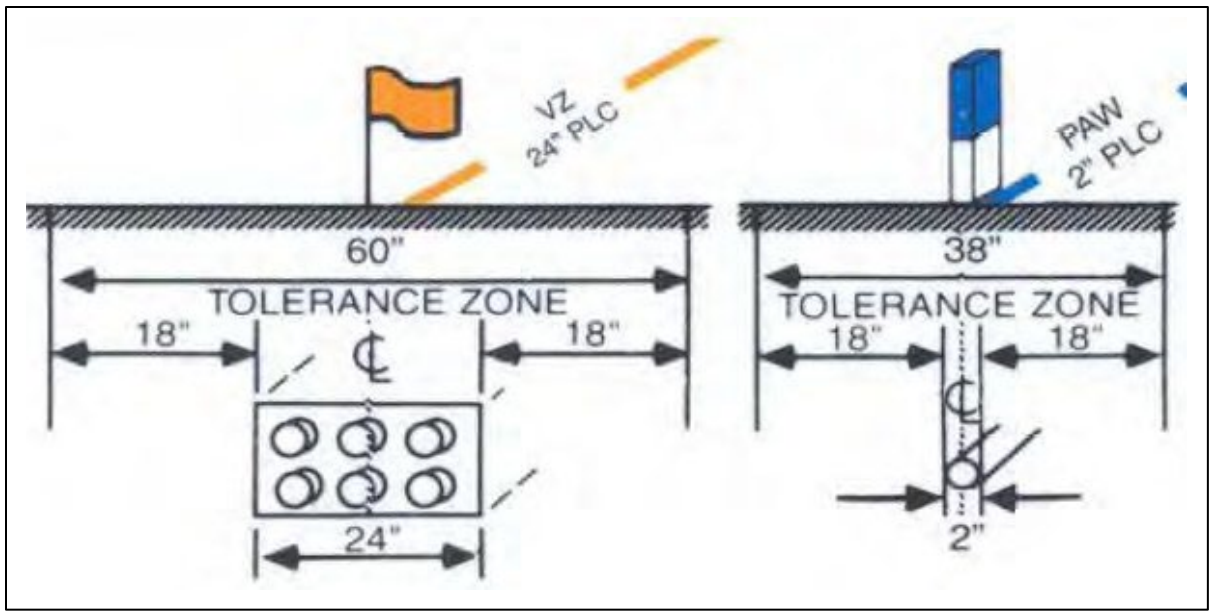

CGA REQUIRED MARKINGS BY LOCATORS	APPENDIX 35B	
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Marking Termination Point, Dead End, Stub Outs

Marking Offsets

Indicate - Facility owner, direction to utility and distance to facility

No conflict (No utilities within the requested area)

NO/MCI NO/EPG

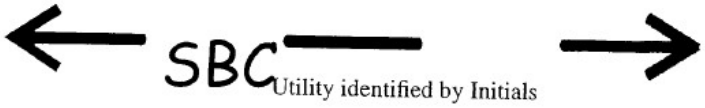
Proposed Markings - Consensus not reached by committee

Electronic Marker

EM

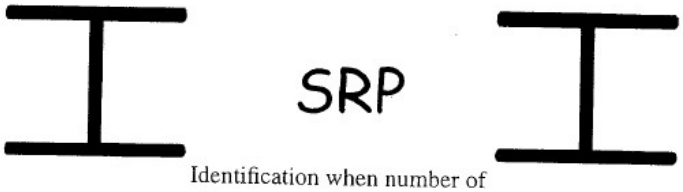
Marking Buried Splices, Valves, Manholes

Line Markings



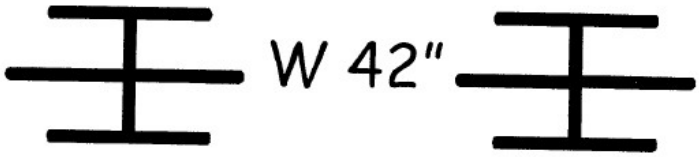
Utility identified by Initials

Corridor Markings



Identification when number of lines cannot be determined

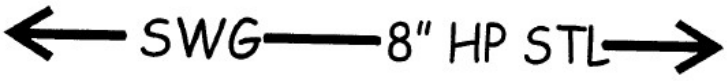
Oversized Utility Markings



Markings for large diameter structures

Conduit Markings

Marking Gas Lines - High Pressure



1.0 SCOPE

These mandatory documentation requirements are inclusive of all SIMON roadway projects ≥ 3 weeks in duration with Long-Term Signage meeting at least 1 of the following criteria: Multi-Lane (4 or more) Undivided Highways, Multi-Lane (3 or more) Divided Highways, or Interstate Highways.

2.0 PURPOSE

These minimum requirements are to be used and followed as outlined herein to ensure that temporary traffic control is set-up in the safest manner possible, both for SIMON employees and for the motoring public. The guidelines must also be followed to document temporary traffic control so that the potential for general liability claims against SIMON is minimized.

3.0 REQUIREMENTS FOR WORK ZONE AND TRAFFIC CONTROL DOCUMENTATION

3.1 Digital Video Cameras.

3.1.1 Superintendent Responsibilities. Temporary traffic control must be documented by the project Superintendent or designee with a digital video camera at the following time increments:

3.1.1.1 At a minimum, 1 time every 7 calendar days- **this may be inclusive of criteria below.**

3.1.1.2 On the 1st day of the temporary traffic control set-up.

3.1.1.3 On the 1st day of a traffic switch, or a change in the temporary traffic control set-up takes place.

3.1.1.4 On any day preceding (before) a holiday, or the day prior to a scheduled 3 day shut-down.

3.1.1.5 Within 24 hours after any serious vehicle accident in the work zone when directed by the SIMON Safety Director.

3.1.1.6 After the project is completed, or when all signage is removed from the roadway on a multi-phase project. In either case, videotaping must take place within 24 hours of all the signage being removed from the project.

3.1.2 Date and Time. Dates and times must be properly set on the digital video camera.

3.1.3 Record Retention. Video documentation (DVD's or better technology) must be stored with project documentation and retained in accordance with SIMON, Inc.'s record retention policies. In all cases, after a serious motor vehicle accident, this video documentation must be submitted to the SIMON Safety Department as directed by the SIMON Safety Director.

3.2 Distance Measuring Instruments (DMI's).

3.2.1 Superintendent Responsibilities. All Temporary Traffic Control Signage must be documented by the project Superintendent or designee with a DMI or equivalent linear measuring device (e.g. - measuring wheel) at the following time increments.

3.2.1.1 On the 1st day of the temporary traffic control set-up.

3.2.1.2 On the 1st day of a traffic switch, or a change in the temporary traffic control set-up takes place.

3.2.1.3 On any day where sign adjustments have been made.

3.2.1.4 Within 24 hours after any serious vehicle accident in the work zone when directed by the SIMON Safety Director.

3.2.2 Work Zone Signage Log. All signage must be documented in linear feet starting with 0 feet at a segment marker prior to the first Advanced Warning Sign, Variable Message Sign, etc. Superintendents or designee must use the SIMON Work Zone Signage Log to do this in Appendix 36A.

3.2.3 Record Retention. The completed Work Zone Signage Logs must be stored with the project documentation in accordance with SIMON' record retention policies. In all cases, after a serious motor vehicle accident this documentation must be submitted to the SIMON Safety Department as directed by the SIMON Safety Director.

3.3 Job Site Conditions Reports (Appendix 36B**).** The Job Site Conditions Report must be completed by the project Superintendent or designee every business day.

3.4 Record Retention. The Job Site Conditions Report must be stored with project documentation in accordance with SIMON' record retention policies. In all cases, after a serious motor vehicle accident this documentation must be submitted to the SIMON Safety Department as directed by the SIMON Safety Director.

4.0 TRAFFIC CONTROL PLANS

Traffic Control Plans must be submitted to the Safety Department after a serious vehicle accident in the work zone, as requested by the SIMON Safety Director.

5.0 SUPERINTENDENTS AND DOCUMENTATION

In all cases, the project Superintendent is responsible for generation of the documentation as outlined above. The Superintendent may only be relieved of his/her documentation duties if another responsible party (employee) is appointed for the project and approval is given by the Area Manager.

WORK ZONE SIGNAGE LOG	APPENDIX 36A	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

Work Zone Set-Up Name/Title: _____

NO.	Sign Title, Segment Marker, or Traffic Device	DMI Reading in Feet
1.	**Segment - /**	**Zero Feet (0')must be a segment marker**
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		

15.		
16.		
17.		
18.		
19.		
20.		

PROJECT NAME:_____ **PROJECT NO.:** _____

PROJECT SUPT. SIGNATURE:_____**DATE:** _____

JOB SITE CONDITIONS REPORT	APPENDIX 36B	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

Date:_____ **Time:**_____ **Weather:** _____

Job Location Area: _____

NO.	CONDITION TO BE REVIEWED AND INSPECTED DAILY	Yes/ No N/A a.m.	p.m.
1	Is traffic control set up in accordance with the appropriate State/Federal DOT documents or the traffic control plan (tcp) of the contract specifications?		
2	Are signs and devices spaced at proper distance?		
3	Is the sight distance from intersecting roadways or driveways obstructed by work zone signs or devices?		
4	Are conflicting signs and signs no longer needed removed or properly covered?		
5	Does traffic appear to understand what it is expected to do? (Does it move smoothly and safely through the work zone?		
6	Are signs and devices properly maintained (clean, legible, and in good state of repair?		
7	Are warning lights functioning properly?		
8	Are signs posted in advance of job limits and hazards, and visible to approaching traffic?		
9	Are roadways and streets kept clean and clear of all ruts, rocks, and spillage?		
10	Are tools, equipment, etc. off the roadway?		
11	Are pedestrian safeguards well-identified and adequate?		
12	Are detours well-identified and lighted?		

13	Are shoulders well-identified?		
14	Are dust control precautions taken?		
15	Have any additional signs, flashers, etc. been placed? If so, where and why?		
16	Is the flagger(s) properly positioned and visible to approaching traffic? (Standing alone away from vehicles or other obstructions, visible to approaching traffic for a distance of 10 times the posted speed?)		

NOTE: all unsatisfactory conditions are to be corrected immediately.

Conditions that were corrected:

1. _____

2. _____

3. _____

Print name of SIMON Superintendent:

_____

Signature of SIMON Inspector:_____**Title:**_____

NOTE: THIS REPORT IS TO BE KEPT WITH JOB PERMANENT RECORDS.

WORK ZONE SAFETY	SECTION 37	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This section will set the minimum guidelines for the maintenance and protection of traffic for all SIMON road work operations. This section incorporates by reference the requirements of job-specific traffic control plans mandated by an owner, other governing state D.O.T.s, or equivalent.

2.0 PURPOSE

The purpose of the work zone safety program is to provide technical information for SIMON Supervisory personnel to do the following: know where to obtain the required traffic control guidelines, to set-up work zone and traffic control correctly by referencing mandated traffic control plans, and to fully outline the SIMON employee safety training requirements for work zone and traffic control. Additionally, this program requires specific general requirements to be followed to ensure the safety of SIMON employees during work zone and traffic control operations.

3.0 DEFINITIONS

State/Federal DOT documents: The required guidelines for all work zone and traffic control in the state of operations. A copy of these documents be obtained from the SIMON Safety Department.

Traffic Control Plan: A job-specific work zone and traffic control plan that must be followed at all times for that specific job.

4.0 TRAINING REQUIREMENTS

4.1 Flaggers. Any SIMON employee who is required to flag at any time on any roadway is required to successfully pass the SIMON flagger training and certification course. The SIMON flagger certification is valid for 3 years from the date of certification. Re-certification must be done as necessary. Flagger certification training will be done during the winter training months.

4.2 ATSSA 8-Hour Work Zone Technician Course. All SIMON Supervisors working in traffic must at a minimum successfully pass the ATSSA 8-Hour Work Zone Technician Course. Also, non-Supervisory personnel may be selected for this course as required by the Area Manager and the SIMON Safety Department. This certification course is valid for 4 years from the date of certification. This course will be done during the winter training months and as available by ATSSA.

4.3 ATSSA 16-Hour Work Zone Supervisor Course. A pre-requisite is the ATSSA 8-Hour Technician Course. This is additional training required for designated SIMON Supervisors who typically spend a significant portion of their work time in traffic. Supervisors who are required to complete this course will be determined by the Area Manager and SIMON Safety Department. This certification course is valid for 4 years from the date of certification. This course will be done during the winter training months and as available by ATSSA.

4.4 General Work Zone and Traffic Control Safety Training. Supplemental work zone safety training will be conducted periodically by SIMON Supervisors on the job during their weekly tool-box safety meetings.

5.0 GENERAL REQUIREMENTS

5.1 Documenting Work Zones. Refer to Section 36 **(WORK ZONE AND TRAFFIC CONTROL DOCUMENTATION REQUIREMENTS)** of this manual for work zone and traffic control documentation requirements.

5.2 High Visibility Clothing. Refer to Section 16 (**HIGH VISIBILITY CLOTHING)** of this manual for high visibility clothing requirements.

5.3 Work Zone and Traffic Control in states other than State/Federal. When working in states other than Wyoming, all state specific requirements and criteria for work zone and traffic control must be followed.

5.4 State/Federal Turnpike. Work zone and traffic control operations on the state/Federal turnpike must be in accordance with and adhere to all State/Federal turnpike requirements.

5.5 State/Federal DOT documents. All work zone and traffic control set-ups must be in accordance with the State/Federal DOT documents. Job-specific traffic control plans are in accordance with State/Federal DOT, and when issued take precedence and must be followed at all times.

5.6 Standing in the Back or on the Back of a Truck to Set or Take Down a Traffic Pattern. Employees are not permitted to stand or kneel in the bed, on the tail gate, or on the bumper of a moving vehicle. Employees are permitted to stand or kneel inside of a protective system approved by the SIMON Safety Department.

5.7 Traffic Control Plans. Job-specific traffic control plans issued by the State/Federal DOT must be followed and followed at all times.

5.8 Yellow/Amber Flashing Lights. All vehicles and mobile equipment in work zones must be equipped with a yellow/amber flashing light that are visible 360 degrees from the light source. The flashing light must be on and functional all of the time while the vehicle and mobile equipment is turned on in the work zone. Track equipment is not required to have a yellow/amber flashing light.

CLEAN FILL REQUIREMENTS	SECTION 38	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 3

1.0 SCOPE

This program covers guidelines for the Management of Fill Policy, a waste management guidance package published by the Department of Environmental Protection (DEP) on April 24, 2004. Additionally, this section provides the requirements for the performance of Environmental Due Diligence Phase 1 (EDD).

2.0 PURPOSE

The Environmental Due Diligence Phase 1 consists of a visual inspection and other background research to investigate the possibility of environmental liability at proposed construction sites. The Management of Fill Policy provides DEP's procedures for determining whether material is clean fill or regulated fill. Regulated fill may not be used unless a solid waste management act permit is secured by the individual or entity using the regulated fill.

3.0 DEFINITIONS

Act 2: The **Land Recycling and Environmental Remediation Standards Act**, often referred to as Act 2, established a framework for developing remediation standards applicable to all releases of regulated substances. It was adopted July 18, 1995.

Brownfields: Abandoned, idled, or under-used commercial, industrial or institutional properties where re-development of reuse are complicated by light to moderate contamination from hazardous substances.

Clean Fill: Uncontaminated, non-water-soluble, non-decomposable inert solid material, including soil, rock, stone, dredged material, used asphalt, and brick, block or concrete from construction and demolition activities that is separate from other waste and recognizable as such.

Comprehensive Environmental Response and Liability Information System (CERCLIS): Compilation of sites EPA has investigated or is currently investigating for a release or threatened release of hazardous substances pursuant to the Comprehensive Environmental Response, Compensation and Liability Action (CERCLA).

Contaminated Material: Solid, liquid or gaseous material that has the potential to threaten public health and/or the environment, and that may require special handling. Potentially contaminated material requires segregation form other material and must be stored in a safe, secure manner so that testing can be performed to determine type of contaminate that may be present. Contaminated material handling may require implementation of personnel protection measures involving respiratory and skin protection.

Decontamination: The removal of potential contaminants from employees and equipment to the extent necessary to avoid adverse health effects and the transfer of contaminants to clean areas.

Environmental Due Diligence (EDD): Efforts taken by the potential future owner of a property to determine the possible environmental liability of a site. It is the use of investigation techniques that may include, but are not limited to: visual property inspection; electronic data base searches; review of property ownership and historic use; review of sanborn (fire insurance) maps or aerial photography; environmental questionnaires and transaction screens; environmental assessments or audits; and /or environmental sampling and analysis. Analytical assessment, testing or sampling is only required if visual inspection or reviews or historic property use indicated evidence of a release of a regulated substance. In court, a defendant must document these efforts to be released from liability under SARA.

Earth Disturbance: Any construction or other activity which disturbs the surface of the land including, but not limited to: excavations, embankments, depositing or storing soil, rock or earth.

Environmental Protection Agency (EPA): Federal agency responsible for enforcing environmental regulation such as RCRA, CERCLA, Clean Air Act, Clean Water Act.

Experienced Personnel: A person possessing sufficient training and experience necessary to prepare and conduct the activity required to be performed, and having the ability to develop sound option and conclusions regarding recognized environmental conditions in connection with the property in question.

Fill: Soil, rock stone, dredged material, used asphalt, and brick, block or concrete from construction and demolition activities that is separate from other waste and recognizable as such.

Greenfields: Land which historically has been prime farmland, open-space, and natural areas that do not have ready access to water, sewer, and infrastructure.

Hazardous Waste: Waste identified by characteristics, source or specific substance as found in the Code of Federal Regulation (CFR) Title 40, Chapter 261. A hazardous waste may: 1) cause or significantly contribute to an increase in mortality or morbidity in either an individual or the total population; and 2) pose a substantial hazard to human health or the environment when improperly treated, stored, transported, disposed or otherwise mismanaged.

Historic Fill: Material used to bring an area to grade prior to 1988 that is a conglomeration of soil and residuals, such as ashes from the residential burning of wood and coal, incinerator ash, coal ash, slag, dredged material and construction and demolition waste.

Manifest: Specific shipping document used by the generator of hazardous wastes to track waste from generation source to treatment or disposal site ("cradle to grave" tracking).

Wyoming Department of Environmental Quality: State regulatory agency responsible for enforcing environmental regulations.

Potential Waste Sites: Property used for, but not limited to: gas stations, dry cleaners, pesticide application, companies, paint companies, machine shops, auto repair/maintenance facilities, chemical manufacturing facilities, dump sites, landfills, waste recycling and processing facilities (including land application), transportation-related operations (railroad, truck terminals, etc.), junk/salvage yards, metal plating facilities, printing facilities, photo processing facilities, analytical laboratories, nursery/greenhouse operations, electronic facilities, manufacturing facilities, and properties that border such operations.

Regulated Fill: Soil, rock, stone, dredged material, used asphalt, historic fill, and brick, block or concrete from construction and demolition activities that is separate from other waste and recognizable as such, that has been affected by a spill or release of a regulated substance, such that the concentrations of regulated substances exceed the values in Table FP-1a and b (a.k.a. the Clean Fill standards).

Regulated Substance: The term shall include hazardous substances and contaminants regulated under the Hazardous Sites Cleanup Act, and substances covered by the Clean Streams Law, the Air Pollution Control Act, the Solid Waste Management Act, the Infectious and Chemotherapeutic Waste Law, and the Storage Tank and Spill Prevention Act.

Release: Spilling, leaking pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing of a regulated substance into the environment in a manner not authorized by the Department of Environmental Quality. The term includes the abandonment or discarding of barrels, containers, vessels and other receptacles containing a regulated substance.

Remediation: Cleanup of environmentally sensitive material. Costs for studies, relocation, management, overhead and other expenses must also be considered in the remediation process.

Superfund Site: Superfund is the commonly used name for CERCLA. It ensures site cleanup by responsible parties or through government funding. High priority sites designated by the EPA for remediation under CERCLA are known as Superfund sites.

Uncontaminated Material: Material unaffected by a spill or release of a regulated substance, or if affected by a spill or release, the concentration of regulated substance are below the concentrations specified in Table FP-1a and b.

Waste Site: Property, including structures on a property, which has been impacted by hazardous or environmentally sensitive materials.

4.0 ENVIRONMENTAL DUE DILIGENCE

Environmental Due Diligence is used to determine if materials are known or suspected to be affected by a release of regulated substances prior to the start of construction. It the responsibility of the most senior SIMON Supervisor-in-charge of the construction project to ensure that each site (private, owner, DOT, State DOT, other government agency, etc.) involved with earthmoving activities has a completed Environmental Due Diligence (Phase I –Visual Inspection). For planning purposes, these visual inspections must be conducted prior to the bidding of a job and should always be completed on foot rather than from a moving vehicle. Please see Appendix 38A for a copy of the Due Diligence Visual Inspection.

4.1 **During Design.** Prior to advertisement for construction, the DOT Design Project Manager or owner conducts Due Diligence for all potential excess excavated material. The SIMON estimator must review all the Environmental Due Diligence documents before bidding any job. If the EDD indicates that there are Recognized Environmental Concerns (RECs), then the SIMON estimator must contact the SIMON Environmental Department (ED). The ED will aid and direct on what steps need to be taken next. If the EDD inspection was performed and no concerns are listed, it is assumed that the material is clean, unless otherwise noted. If the inspection was performed more than a year prior to the start of construction, the EDD inspection must be performed again by the most senior SIMON Supervisor-in-charge or designee.

4.2 A copy of the EDD inspections and Origin of Clean Fill Documents, found in Appendix 38B, must be given to landowners of the property by the most senior SIMON Supervisor-in-charge on which any material from a construction site is placed. A copy of all the EDD forms must be kept with the job files for at least five years.

5.0 MANAGEMENT OF FILL

The Management of Fill program only applies to fill when it is:

5.1 Moved off site from the construction or maintenance project area or project right-of-way (ROW) in which it has been generated, and

5.2 When it is imported to the project area or project ROW.

This Management of Fill program does not apply to fill generated and reused within a project area or project ROW, including fill temporarily staged outside the project ROW and later used as structural fill within the project ROW, such as may occur with the use of temporary construction easements.

Fill is unregulated (clean) either if it is unaffected by a spill, or if it is affected by a spill or release, and chemical analysis shows concentrations of regulated substances to be below Clean Fill Standards. Clean Fill standards can be obtained through the SIMON environmental department when requested by an SIMON Supervisor. Fill is considered Regulated Fill if it meets the definition of Historic Fill or if it is affected by a spill or release, with contaminant concentration above the Clean Fill standards. All analytical results used in the determination of fill should accompany the fill to the final placement along with the EDD Inspection and Origin of Clean Fill Document.

It is the responsibility of the most senior SIMON Supervisor-in-charge and the SIMON environmental department to determine if the material on a job is classified as clean fill or regulated fill. The most senior SIMON Supervisor-in-charge is also responsible to obtain from the fill supplier an EDD Inspection and/or an Origin of Clean Fill document for all borrow fill materials entering the construction ROW or project location. The Project Manager is also responsible for ensuring that these forms are submitted and accepted by DOT or the landowner prior to delivery of the materials to the project site.

ENVIRONMENTAL DUE DILIGENCE (EDD) PHASE 1 VISUAL INSPECTION FORM	APPENDIX 38A	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

Date: _____

SR/SEC: _____

ECMS Project or Project#: _____

Activity: _____

Location: _____

VISUAL SITE VEGETATION (EDD-Phase 1)		
Stressed Vegetation	☐ **Yes**	☐ **No**
Staining on Soils	☐ **Yes**	☐ **No**
Staining Along THE STATE/FEDERAL DOT ROW or on ROW Materials.	☐ **Yes**	☐ **No**
Detectable Odors	☐ **Yes**	☐ **No**

Comments: Attach additional pages or information as necessary.

FINDINGS- CHECK ONE:

- ☐ Due diligence inspection performed and no visual evidence of a spill or release in a project ROW was detected.
- ☐ Due diligence inspection performed and evidence of a spill or release in project ROW was detected. Phase 2 documents attached.
- ☐ Due diligence not applicable for this project. No waste or fill.

Signature: _____

Printed Name: _____

Title: _____

Organization: _____

Form must be maintained for a minimum 5 years in the project document file

CERTIFICATION OF ORIGIN OF CLEAN FILL	APPENDIX 38B	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

I, the undersigned, certify that fill material that has been determined to be clean fill has been placed on the following property:

Property Name:_____

Current Owner of Property:_____

Property Address:_____

_____

This fill material will be used solely for property improvement or construction purposes. Copies of the laboratory analyses that confirm that this material is clean fill are attached to this form.

Date:_____

Name:_____

Title:_____

Address:_____

_____

Phone:_____

This form is to be maintained by the owner of the property receiving fill material. If a property received fill from multiple sources, a separate certification form is required for each source.

1.0 SCOPE

This section sets the minimum requirements to be followed by SIMON Supervisors and personnel when working with or near nuclear compaction gauges. In addition, this section encompasses the requirements of NUREG 1556, 49 CFR subpart H and IATA 1.5.2.

2.0 PURPOSE

The purpose of this nuclear radiation safety program is to provide technical and procedural information for SIMON personnel to do the following: meet all defined criteria of the SIMON Nuclear Radiation Safety Program, meet the training requirements, and fulfill all other OSHA, NRC and NEDEP Bureau of Radiation Protection requirements set forth in the regulations.

3.0 DEFINITIONS

RSO: Radiation Safety Officer. The SIMON Corporate Safety Director is the RSO.

Gauge User: SIMON employee designated by SIMON to operate the Troxler nuclear radiation compaction gauge. This person must have completed a Troxler gauge operating and hazmat safety course or equivalent.

NRC: Nuclear Regulatory Commission.

ALARA: As Low As Reasonably Possible.

4.0 EMPLOYEE TRAINING

Every SIMON employee participating in the SIMON Radiation Safety program is required to have successfully completed a Troxler or equivalent nuclear gauge safety training course. Refresher training is required every 3 years.

5.0 FACILITIES AND EQUIPMENT

There are three approved gauge storage areas—Cheyenne Regional Shop and North Platte Shop. Access to the gauge storage areas is restricted to those individuals approved by the RSO. The gauge storage area will be secured by a double lock system.

6.0 OPERATING AND EMERGENCY PROCEDURES

Each gauge user is required to have completed a nuclear gauge safety training program before they are permitted to use a nuclear gauge. Personal exposure shall be kept to a minimum by following the time, distance and shielding principles for all gauge users as taught in the Troxler nuclear gauge safety training manual related to the ALARA concept.

7.0 OPERATING AND TRANSPORTATION PROCEDURES

Before any operator removes a gauge from storage, inspect the gauge case to ensure the case is in good condition, that all warning labels are legible and intact, and that all hinges, clasps, and locks are in operating condition. Also, check to see that the source rod is in the locked position. The gauge case should be locked when it leaves the storage facility. As each gauge is removed from the storage facility, it is to be signed out on a "Sign In/Out Log sheet" that is to be kept at the storage facility. Information on this log sheet must include the following: operator signing for it, date out, destination, and date signed back in.

Each gauge shall have proper shipping documentation in the transport vehicle. A properly completed Bill of Lading and Emergency Response information shall be in the vehicle, immediately accessible and visible to the driver. The gauge case shall be properly secured and locked in the back of the transport vehicle. The Emergency Response Information is located at the end of this section.

When the gauge is in the field, the operator as the authorized user must maintain control over the gauge at all times and keep unauthorized personnel out of the gauge operating area. The operator will at no time leave the gauge unattended.

When operating the gauge, the operator will wear the personal monitoring device assigned to them. Never wear another operators monitoring device (TLD or film badge). When not in operation, the source rod must always be kept in the safe and locked position. When not in use the gauge must always be stored in the transportation case and returned to the permanent storage facility as soon as possible. Upon return to the storage facility, sign the gauge back in on the "Sign In/Out Log Sheet".

8.0 EMERGENCY PROCEDURES

In the event of physical damage to a gauge, the following steps must be taken:

8.1 Locate the gauge and/or source.

8.2 Do not touch or move the gauge.

8.3 Immediately cordon off an area around the nuclear gauge and/or source. A radius of 15 feet (5m) will be sufficient. Do not leave the area unattended.

8.4 Keep all unauthorized personnel from the nuclear gauge.

8.5 If a vehicle is involved, it must be stopped until the extent of contamination, if any, can be established.

8.6 The gauge user should perform a visual inspection of the nuclear gauge to determine if the source housing and/or shielding has been damaged.

8.7 Use a survey meter to measure the dose rate at a distance of one meter (3 feet) from the gauge.

8.8 Contact the company RSO (name and number given at the beginning of this section). Provide the RSO with the following:

8.8.1 The date, time and location of the accident.

8.8.2 The gauge model and serial number.

8.8.3 The nature of the accident.

8.8.4 The location and condition of the gauge and /or source.

8.8.5 The dose rate at one meter (3 feet) from the gauge.

8.9 If you are unable to reach the RSO, then call your regulatory agency.

8.10 Follow the instruction of the RSO. The RSO should report the incident to the regulatory agency and may also be required to notify the USDOT of accidents during transport.

8.11 Before shipping a damaged gauge to Troxler, obtain an RGA (required goods authorization) number from the Troxler RSO. **In the event that a gauge is lost or stolen, the Radiation Safety Officer listed above is to be notified immediately.**

8.12 EMERGENCY CONTACTS:

Radiation Safety Officer (RSO): Dan Glowatz

Day: 307-635-9005

Email: DGlowatz@simoncontractors.com

Cell: 307-631-3033

9.0 MAINTENANCE

When performing any cleaning or maintenance on a gauge, the operator will wear a personal monitoring device. At all times, the source rod shall be in the locked, safe, shielding position in accordance with the manufacturer's recommendations. At no time shall cleaning be performed with the source exposed out of the shield or the source rod removed from the gauge.

10.0 LEAK TESTING

All gauges will be leak tested at intervals not to exceed six (6) months. The leak test will be performed using an approved leak test kit. The leak test will be performed using the manufacturer's instructions. When performing the leak test, personal monitoring devices must be worn. Any analysis with the removable activity of >0.005mCi will cause affected gauges to be immediately removed from use. The gauge shall be sent to the manufacturer for repair or disposal.

11.0 ANNUAL AUDIT

The RSO will be responsible for the annual audit of the license to assure compliance with regulations. This Radiation Safety Program will be reviewed to comply with 180 NAC 1 and DOT regulations.

12.0 WASTE MANAGEMENT

Disposal of the gauge will be by transfer to a licensed disposal facility.

FIRST-AID/CPR/BLOOD- BORNE PATHOGENS: GENERAL REQUIREMENTS	SECTION 40	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This section sets the minimum general safety requirements for Supervisors and employees to be followed on any SIMON job-site, plant, and/or company-owned property with regard to First-Aid/CPR/Blood-Borne pathogens issues that arise.

2.0 PURPOSE

The purpose of this section is to provide clear "general" safety criteria for SIMON Supervisory personnel and employees in which they are required to adhere to at all times regarding First-Aid, CPR, and Blood-Borne pathogens.

3.0 DEFINITIONS

First-Aid/CPR/Blood-Borne Pathogen Training: This training is provided by the company through a qualified outside vendor and will always be in accordance with OSHA/MSHA requirements and at a minimum be recognized by the American Red Cross, American Heart Association, or equivalent. Upon successfully completing the course employees will be issued wallet cards by the outside vendor. This course is taught during the winter training season and re-certification is every 2 years. Annually, supplemental training will be conducted as a refresher for all employees through Tool-Box Safety Meetings.

First Responder: A SIMON employee who is trained in First-Aid/CPR/Blood-Borne Pathogens and whose certification is valid.

Universal Precautions: A term used to describe precautions taken with potentially infectious materials, such as blood, body fluids, etc. An example of a universal precaution is using rubber gloves.

4.0 GENERAL REQUIREMENTS

4.1 Training Requirements. All Foremen and Superintendents are required to have a valid First-Aid/CPR/Blood-Borne Pathogens training certification; trained means an employee is considered a First Responder. At a minimum, 1 certified employee must be on-site at all times, which means that specific crews and locations will more than likely need additional employees certified to render treatment to an injured employee, in addition to the Foreman/Superintendent. Supervisors will receive this training at the time of initial assignment. If training is unable to be completed at time of initial assignment, then at a minimum another employee must be certified on the crew and be assigned these responsibilities. OSHA requires training records to be kept for a minimum of 3 years, though SIMON keeps training records in excess of 3 years.

4.2 First-Aid Supplies. First-Aid supplies and kits must be readily available to employees on-site. All Foremen and Superintendents must carry a fully-stocked first-aid kit in their vehicle. In addition, the job offices, plant offices, and offices in general must have fully-stocked first-aid kits easily accessible to employees when required. Containers must be weather proof with contents being in individually sealed packages. First-Aid supplies must be purchased through a vendor approved by the SIMON Safety Department.

4.3 Exposure Control Plan. Employees of SIMON will have access to this exposure control plan at the request of the employee.

4.4 Cleaning Contaminated Surfaces. When working surfaces have been contaminated with blood or body fluids, then they must be cleaned with proper cleaning solutions. Universal Precautions should be used when doing this type of work.

4.5 First Responder Masks (Breather Masks) and Rubber Gloves. These items must be included in each First-Aid Kit and be utilized by The SIMON trained First Responder in the event there is a potential for exposure to body fluids and/or blood. These items must be part of the first-aid kit and readily available to first responder employees, at no cost to the employee(s).

4.6 First-Aid Supplies Inspection. The SIMON Supervisor is responsible to inspect the first-aid kits on a routine basis. On construction jobs, this must be documented on a weekly and monthly basis. Deficiencies with supplies must be replenished in a timely manner so that adequate supplies are readily available when needed.

4.7 Flushing of Eyes and Body. At each of the SIMON fixed facilities where a quick drenching of an employee's body or eyes may be needed as a result of contact with harmful material such as hot liquid asphalt, corrosive liquids, or caustic materials, an emergency shower with combination eye-wash must be permanently installed and inspected on a routine basis.

At each of the SIMON construction projects, emergency eye-wash bottles are required to be maintained with the first-aid supplies. Where employees may be potentially exposed to something more serious than what an eye-wash bottle can adequately handle, then the SIMON Supervisor must make arrangements to have a portable eye-wash at the job-site. This must be adequately maintained for the duration of job where employee may be exposed.

4.8 Hand Cleaning. At a minimum, SIMON fixed facilities and construction jobs must have hand washing facilities. If running water is unavailable, then hand sanitizer or a hand sanitizing dispenser is acceptable. Typically port-o-pots are equipped with hand sanitizing dispensers and can be rented this way.

4.9 Hepatitis B Vaccines. The Hepatitis B vaccine is available to any SIMON employee who works directly around potentially infectious materials at no charge to the employee; for example, most of the utility crew employees elect to get the Hepatitis B vaccination.

4.10 Medical Records. All employee medical records are kept for length of employment and 30+ years with an occupational exposure to infectious materials

SHORT-SERVICE EMPLOYEES (SSE) and COMPETENCY ASSURANCE	SECTION 41	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This policy sets forth the minimum requirements for all newly hired employees and newly promoted employees, specifically for them to be identified adequately for a minimum period of 6 months to promote a commitment to their health and safety while performing work activities on any SIMON owned property and/or job-site.

2.0 PURPOSE

The purpose of this Short-Service Employee (SSE) Policy is to ensure that SIMON field employees and field Supervisory personnel with less than 6 months of experience are identified, adequately supervised, trained and managed so as to prevent injury to themselves or others, property damage, or environmental harm.

3.0 DEFINITIONS

New Employee Field Safety Orientation: The orientation that is required to be completed by the immediate SIMON Supervisor when the new employee shows up on the job the first day, and is required to be done before the employee goes to work.

New Employee Field Safety Orientation Form: The form required to be completed by the immediate SIMON Supervisor while he/she is conducting the new hire field safety orientation. This form must be completed, signed, and dated by the SIMON Supervisor and turned directly in to the SIMON Safety Department. The form is located in Appendix 41A.

Short-Service Employee (SSE): Any new SIMON employee with less than a minimum of 6 months of service to SIMON will be considered a Short-Service Employee. Any newly promoted craftsperson will be considered a Short-Service employee for a minimum of 6 months.

Short-Service Removal and Competency Assurance Form: For craftsmen, a Superintendent or higher must sign-off on the form. For Supervisory personnel, the Area Manager or higher must sign-off on the form. Once this form is completed it must be turned in to the SIMON Safety Department. The form is located in Appendix 41B.

4.0 IDENTIFICATION OF SHORT-SERVICE EMPLOYEES

SSE personnel must wear a hi-visible orange SIMON hard hat with the date of orientation placed in the designated area on the back of the hard hat. This will be done at the time of the initial orientation. Any employee who is required to wear a white hard hat must have a hi-visible orange sticker placed directly on the back of the hard hat. For new hires the sticker must indicate the date of orientation, and for existing employees the sticker must indicate the date of the job classification change.

4.1 New-Hires. At the time of initial safety orientation, each SSE will be issued the New Employee Field Safety Orientation Form (Appendix 41A). The new hire is expected to bring this to his/her job on the first day and give it to the immediate Supervisor. It is the responsibility of the immediate Supervisor to conduct a field safety orientation, satisfactorily complete the form while doing the orientation, sign and date the form, and turn the form in to the SIMON Safety Department upon completion.

5.0 ASSIGNING A CREW MENTOR TO SHORT-SERVICE EMPLOYEES

It is the responsibility of the immediate SIMON Supervisor to assign a Mentor to the SSE. This is an informal process and is expected to be done informally. It is the Mentor's responsibility to closely supervise the SSE and assist and help in preventing him/her from performing tasks for which they are not properly trained.

6.0 REMOVAL FROM SHORT-SERVICE STATUS

To be removed from SSE status, the employee must exhibit safe behavior and have a solid understanding of the SIMON safety requirements, for a minimum period of 6 months, unless decided otherwise by the immediate SIMON Supervisor. Examples of demonstrated safe behavior are as follows: incident-free work history, proactively participating in making the work and job-site safe, reporting incidents and near misses, attendance at weekly tool-box meetings, etc.

After the period of 6 months, the immediate SIMON Supervisor must positively answer all questions on the Competency Assurance portion of the Removal Form for the SSE to be removed from SSE status. In the event that there is a negative check to any question the SIMON Supervisor must leave the employee on SSE status for a determined period of time until all questions can be positively answered.

Once it is decided to take the employee off of SSE status, the Short-Service Removal and Competency Assurance Form, in Appendix 41B must be satisfactorily completed by the immediate SIMON Supervisor and the Area Manager when applicable, and then turned directly in to the Safety Department.

7.0 OWNER, GENERAL CONTRACTOR, AND CONTRACTUAL SHORT-SERVICE REQUIREMENTS

It is the responsibility of the Area Manager and all project supervision to ensure that their crews and employees know and ensure that they are in compliance with all owner, general contractor, and contractual short-service requirements as mandated. For example, utilizing the proper owner SSE forms and ensuring that the percentage of SSE employees on a crew is permitted.

NEW HIRE SAFETY CHECKLIST

Purpose: This program is designed to provide a smooth transition for new hires into the field. This is an opportunity for the Foreman to discuss safety with the new hires, and to express their expectations and commitment to safety.

Scope:

- Evaluate the new hires experience in the construction industry.
- Identify job site hazards, and safe work practices.
- Identify current trends such as injuries and other type of problems.
- Ask new hires if they have any concerns or limitations.

Initiation: All new employees receive a general safety orientation with the Safety Department. After this orientation is complete and **prior** to new hire beginning work, the **Foreman** will discuss all safety issues pertaining to the job duties of the new hire, and **evaluate** their level of **competency**.

New Employee (Foreman reads to new hire): As a new employee you have many things to learn. Try to absorb as much as you can about the requirements of your job. Practice sound safety and you will develop good safety habits. If you have any questions about your work assignment, ask your Supervisor. If you are an old hand, practice the good experience acquired over the years. Often, a new employee will model the behavior of a more experienced worker so set a good example. Just in case you're the one being looked up to, be sure that you set a good example. Exhibit good judgment, common sense, and most importantly, sound safety practice. On or off the job, the safe way is the best way.

EVERY JOBSITE HAS DIFFERENT HAZARDS AND PROBLEMS. WHEN YOU SWITCH TO A NEW WORKSITE YOU BECOME A NEW EMPLOYEE.

SUPERVISOR MUST REVIEW AND DISCUSS THE FOLLOWING ITEMS. CHECK OFF EACH ONE COMPLETED:

- ❑ Tool-Box Meetings require 100% attendance.
- ❑ Discuss ladder and scaffold safety.
  - ❑ Discuss 4 in 1 rule (proper slope).
  - ❑ Discuss guardrail rule – 39 inch minimum top rail height.
- ❑ Describe accident reporting process and post-accident drug testing.
- ❑ Discuss proper rigging practices.
- ❑ Review fall protection requirements – 6 foot or greater rule.
  - ❑ Proper wearing of harness.
  - ❑ Proper use of retractable.
  - ❑ Employee not permitted in 6 foot fall area until trained by Safety Department.
- ❑ Discuss the operation of motor vehicles/equipment at the site.
  - ❑ 3 –points of contact to get in and out of equipment/trucks/large vehicle
  - ❑ Backing Policy
    - ❑ Back up alarms / heavy equipment/blind spots
  - ❑ Seat belts use is required 100% of the time in vehicles/equipment.
- ❑ Review Personal Protective Equipment requirements.
  - ❑ Hard Hat/Safety Glasses/Boots- 100%
  - ❑ Hi-Visibility Gear- Vests, Shirts, Jackets, etc.
  - ❑ Wearing of safety glasses/face shields
  - ❑ Respiratory protection if applicable.
- ❑ Identify the rules regarding excavation work.
  - ❑ 4 feet or more require ladder no more than 25 feet in any direction.
  - ❑ 5 feet or more requires protective system (e.g. Trench box, sloping
  - ❑ Ground level must be 2 feet below top of trench box.
  - ❑ Trench box no more than 2 feet off the bottom of the trench.
- ❑ Discuss the use and care of hand power tools
- ❑ Identify precautions with chemicals and where the SDS poster/ book is located.

- ❑ Discuss SDS with new hires and how they can obtain info from them.

❑ Identify electrical safety hazards.

- ❑ Spoil piles at least 2 feet away from edge
- ❑ GFCI use 100% at all SIMON job locations.

❑ Overhead Power line Requirements- Safe Distances.

❑ Discuss proper lifting techniques- Get assistance from other people when needed.

❑ Discuss work zone and traffic control safety requirements- in general.

❑ Discuss any confined space situations and the rules

❑ Discuss housekeeping, a clean job, hand cleaning, and toilet facilities.

❑ Other Items:

NEW HIRE NAME (PRINT): **SIGNATURE:** **DATE:**

SUPERVISOR (PRINT): **SIGNATURE:** **DATE:**

SHORT-SERVICE EMPLOYEE REMOVAL FORM and COMPETENCY CHECKLIST	APPENDIX 41B	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

The immediate SIMON Supervisor must complete this form to remove an employee from the SSE program.

SIMON SSE name:_____

Current job title:_____

Date SSE service began (located on back of hard hat): _____

*Who has been assigned as the most recent SSE mentor? _____

Date of completion of the New Hire 8-Hour Safety Training:_____

*This is indicated because employee may have worked on multiple projects under multiple Supervisors.

Employee is removed from SSE status upon satisfactory completion of the Competency Checklist on the following page.

Upon completion of these forms send directly to the SIMON Safety Department.

To be completed by the immediate SIMON Supervisor				
Employee Name:			**Previous Experience(yes):**	
Description ofwork:				
Check yes or no and initial.	Yes (√)	No	Worker	Superviso
Worker has reviewed and has a basic understanding of the safety manual, its location, and how to find information.				
Worker has been trained in, participates in, and has a basic understanding of hazard assessments and JSAs.				
Worker has been competently trained regarding the known hazards of the position, and how to deal with them.				
Worker is trained in, and uses, proper PPE for the job, and knows to ask Supervisor when something is needed that is unexpected.				
Worker has demonstrated safety awareness around other workers, vehicles and equipment, and public traffic.				
Worker has demonstrated the importance of reassessing the hazards and work plan when conditions change unexpectedly.				
Worker understands/demonstrates not to perform unsafe work, report it, and to get help as needed to make it safe.				
Worker has demonstrated a commitment to safety, and is competent to work for extended periods of time unsupervised.				
Worker has demonstrated the skill and experience necessary to participate in training others in similar or related positions.				
If no to any of the above questions, employee cannot be removed from SSE status.				
Comments:				
SIMON Employee Name	**Signature:**		**Date:**	
SIMON Immediate Supervisor	**Signature:**		**Date:**	
SIMON Supervisor	**Signature:**		**Date:**	
Must be a Superintendent level or higher.				

FIT FOR DUTY	SECTION 42	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This policy sets forth the minimum requirements for all SIMON employees and prospective employee candidates and encompasses general requirements to ensure employees are fit to perform their job tasks in a safe manner. Fit means verification through satisfactory completion of physical exams, post-offer physical capacity screens, no impact to the employee's performance from over-the-counter and prescription medications, fatigue management, and satisfactory drug/alcohol test completion.

2.0 PURPOSE

The purpose of this Fit-for-Duty policy is to ensure that SIMON employees and subcontractors are "Fit" to perform their job tasks in a Safe Manner.

3.0 GENERAL REQUIREMENTS

3.1 Physical Exams. All prospective employment candidates must successfully pass a physical exam. D.O.T. employees must successfully pass a D.O.T. physical exam.

3.2 Post-Offer Physical Capacity Screen. All prospective employment candidates must complete an examination regarding the person's ability to perform essential functions relating to the position for which the person is being hired.

3.3 Task Training. Employees must receive training specific to their assigned work and job tasks—for example, respiratory fit tests, crane operator certification, aerial lift certification, working in a trench, working on a scaffolding, etc. All safety and health training requirements are outlined in Section 30 (**SAFETY AND HEALTH TRAINING**) of this manual. Task training can be done through on-the-job training, tool-box talks, job-specific training, formal training courses/certifications, etc.

3.4 Safe Work Practices and Procedures. All SIMON employees and subcontractors' employees must follow known safe work practices and procedures at all times. This is also inclusive of the SIMON Corporate Safety Manual, which means all employees must adhere to all requirements in the SIMON Corporate Safety Manual. Safe work practices and procedures are identified throughout the entire Corporate Safety Manual.

3.5 Over-the-Counter and Prescription Medications. Employees must report all medications they are taking that could impact their performance and impact the safety of themselves or others. Examples are over-the-counter flu, cold, or allergy medications that may cause drowsiness, or prescription medications such as pain killers that could impact or impair an employee's judgment or cause drowsiness. Use of medications that could impact or impair an employee's judgment or may cause drowsiness during work hours is not permitted.

3.6 Work Hours. Work hours, job rotation, work breaks, and the analysis of work tasks should be looked at by SIMON supervision to help in controlling worker fatigue, all of which will aid in increasing employee mental fitness.

3.7 Ergonomic Equipment. Where practical, the use of ergonomic friendly equipment should be used (i.e. - vibration gloves for jackhammering).

3.8 Employee Impairment Monitoring. It is the responsibility of all SIMON supervision to monitor employee performance and behavior for signs of impairment or erratic behavior that could present a safety and health issue to themselves or other employees. Determinations must be made to send an employee for reasonable suspicion drug/alcohol testing and removal from the work-site depending on what is observed. It is the responsibility of the Supervisor to immediately contact the Human Resources and/or Safety Department when any unusual behavior is determined to be so.

3.9 Fatigue Management. SIMON employees are required to notify their direct Supervisor if the employee believes he/she is fatigued and not able to perform their job duties safely. With regard to D.O.T. Hours of Service

requirements, it is the responsibility of the SIMON Supervisor-in-charge to ensure that employees do not work outside of the maximum number of hours requirements. Employee training on fatigue and controlling fatigue will be done through orientation, annually, and periodically and included in weekly tool-box safety meetings as well as the Daily Hazard Assessment.

3.10 Drug/Alcohol Testing. The following types of tests are required for prospective employment candidates and SIMON employees:

3.10.1 Pre-Employment.

3.10.2 Random and D.O.T. Random.

3.10.3 Post-Accident and Post-Incident.

3.10.4 Reasonable Suspicion. This will be determined after evaluation by the SIMON Supervisor/Competent Person on-site that an employee is potentially performing work under the influence, and then that individual will be required to submit to a drug and alcohol test.

3.10.5 Testing as required by an owner/client contract agreement. An unacceptable test result will prohibit the employee from being able to work on the owner/client site as required by the owner/client.

1.0 SCOPE

This section will set the guidelines for administrative and procedural requirements for construction waste management and spill response practices at our operations.

2.0 PURPOSE

The purpose of this section is to provide clear requirements for SIMON Supervisory personnel and all employees for waste management and spill response at all SIMON job-sites, plants, and facilities.

3.0 GENERAL REQUIREMENTS FOR WASTE MANAGEMENT

3.1 Waste is frequently generated at SIMON' projects. It is required by project supervision to estimate waste that will be generated prior to work being performed so that the need for waste containers and waste removal can be determined. All efforts must be made to segregate, recycle, reuse, and limit the quantity of waste materials generated. Each project is unique and therefore will produce a variety of waste due to the nature of the industry. Therefore, guidance of how to handle the waste that is commonly generated at the sites is listed below in this section.

3.2 It is the responsibility of the most senior SIMON Supervisor to ensure that all material is recycled, reused, or disposed of at an appropriate facility according to local, state, and federal regulations. Check with the HSE Department for special waste disposal guidance for items that are not listed below. All municipal waste should be managed through the local sanitation service, and therefore is not addressed in this document.

3.3 Employees must be instructed on the proper disposal method for wastes, and this is the responsibility of SIMON supervision. This may include general instruction on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, see **Hazardous Waste** and **Lead Paint Chips** below.

3.4 **Abrasive blasting sand/agents** – May contain metals, paint, or other contaminates. Dispose of at a landfill authorized to accept this material.

3.5 **Asphalt (chunked)** – Take to nearest SIMON Hot Mix Asphalt Plant for processing and reuse when possible. Chunked asphalt may also be used as clean fill material.

3.6 **Asphalt (milled)** – Take to the nearest HMA Plant for use as RAP. Milled asphalt is not considered clean fill.

3.7 **Asbestos (Friable)** – Contact the HSE Department. An abatement contractor is required for all friable asbestos removal and disposal.

3.8 **Asbestos (Non-Friable)** – Contact the HSE Department. Encapsulate in at least 6 mil plastic and label as "Non Friable Asbestos Waste – Keep Out." Dispose of at a landfill authorized to accept this material.

3.9 **Bricks** – Clean Fill

3.10 **Ceramics** – Clean Fill

3.11 **Concrete** – Process and reuse as aggregate or as clean fill.

3.12 **Contaminated Soil** – Contact the HSE Department. Encapsulate waste in at least 6 mil plastic and label as "Contaminated Soil – Keep Out". Dispose of at a landfill authorized to accept this material.

3.13 **Hazardous Waste –** SIMON is not permitted to handle hazardous waste. At no time shall an employee handle, transport, or dispose of hazardous waste without proper training and approval. The only exception to the handling of hazard waste is lead paint from our bridge projects. Please see the specific handling procedures listed below.

3.14 **Land Clearing Debris** – Ground on site for the use of soil erosion control products or haul to a processor. Not to be used as clean fill.

3.15 Lead Paint Chips (hazardous) – Contact the HSE Department. Make arrangements with an approved hazardous waste transporter and disposal facility. Store paint chips in a sealable container and label as "Hazardous Waste – Lead Paint Chips – Keep Out".

3.16 Metals – Sort and recycle at a scrap yard or metal recycler (steel, aluminum, brass, copper, lead, stainless, etc.).

3.17 Paints (liquid products) – Check Safety Data Sheet for proper disposal recommendations. Dispose of accordingly.

3.18 Soil, rock, gravel, sand, clay – Clean fill if free of contamination.

3.19 Tiles – Clean Fill

4.0 GENERAL REQUIREMENTS FOR SPILL RESPONSE

It is the goal of SIMON to have ZERO spills. However, if a spill does occur at a job site, plant or facility, it is mandatory to follow a step-by-step process to ensure employee safety and protection of the environment. It is required that each job site, plant, distributor truck, triaxle and facility be equipped with spill kits. All spills are to be reported to the SIMON Job Supervisor and the SIMON HSE Department. **An Accident/Incident Report (Section 5 of this manual) is required to be completed and submitted to the HSE department for all spills within 24 hours of when the spill occurred.** Use the following steps to deal with a spill:

4.1 Assess the risk. From the moment a spill occurs and throughout the response, determine the risks that may affect human health, the environment, and property. Always put safety FIRST. If possible, identify the spilled material and determine how much was spilled. Call 911 if people are hurt, or if the spill may combust or the material cannot be identified and heat/ignition/sparks are close by (evacuate). If the chemical or product cannot be identified, only professional emergency response personnel should clean up the spill. A professional emergency management agency should also be contacted if the spill has occurred near or in a waterway.

4.2 Select personal protective equipment (PPE) Choose the appropriate PPE to safely respond to the spill. Consult Safety Data Sheets (SDS) and literature from chemical and PPE manufactures for the best recommendations. If you are uncertain of the danger and the material is unknown, assume the worst and use the highest level of protection.

4.3 Stop the source. Stop the source of the spill if it can be accomplished safely and in a timely manner. If not, proceed to step 4.

4.4 Confine the spill. Limit the spill area by blocking, diverting, or confining the spill. Use contained absorbents including pads, socks, and booms. Stop the flow of the liquid before it has a chance to contaminate a water source.

4.5 Evaluate the incident and implement cleanup. Once the spill is confined and the leak has been stopped, it is time to reassess the incident and develop a plan of action for implementing the spill cleanup. Spills are commonly absorbed or excavated and the contaminated soil is encapsulated in plastic and staged onsite.

4.6 Decontaminate. Decontaminate the site, personnel, and equipment by removing or neutralizing the contaminated materials that have accumulated during the spill. This may involve cleaning excavation equipment or the disposal of PPE that came in contact with the spilled material.

4.7 Complete required reports. Contact the HSE Department to complete all notifications and paperwork required by local, state, and federal guidelines for reporting spill incidents. Failure to do so can result in severe penalties.

4.8 Emergencies: If an emergency contractor is needed to contain or cleanup a spill please contact the SIMON Safety Department, and they will coordinate with local contractors.

5.0 BEST MANAGEMENT PRACTICES TO USE TO PREVENT SPILLS OR AID IN CLEAN-UP.

5.1 Chemical substance must always be stored in proper containers to minimize the potential for a spill.

5.2 Chemicals must be kept in closed containers and stored so they are not exposed to storm water.

5.3 All areas where chemicals are used or stored must be maintained using good housekeeping best management practices. This includes, but is not limited to: clean and organized storage, labeling, and secondary containment where necessary.

5.4 All 55-gallon drums and petroleum products must be kept in secondary containment.

5.5 All stationary fuel tanks must be located in secondary containment with overfill/overflow protection.

5.6 Use universal spill kits that contain the appropriate supplies needed to respond to any material that may be spilled.

5.7 Have all spill absorbent supplies easily accessible.

5.8 Take into consideration both the type and quantities of material when preparing spill absorbent supplies for a specific piece of equipment or jobsite.

5.9 Each jobsite Supervisor must review the proper response procedures with their crews on a regular basis and with all new employees. Use weekly toolbox talks, this section of the safety manual, and site-specific Pollution Prevention and Contingency plans to regularly train the crews. Employees are required to be trained by their Supervisor on the following: the proper response procedures for spilled materials, the types of spill kit materials available for use, proper waste disposal, and communication procedures in the event that a spill occurs.

5.10 Estimate the waste that will be generated prior to work being performed so that the waste removal can be scheduled in a manner that does not interfere with the working schedule of the project.

5.11 Waste materials should be properly stored and handled to minimize the potential for a spill or impact to the environment. During work activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.

HEARING CONSERVATION PROGRAM- MSHA	SECTION 44	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 5

1.0 SCOPE

This program applies directly to all SIMON operations under the jurisdiction of MSHA. This program supersedes Section 25 (**PERSONAL PROTECTIVE EQUIPMENT**) of this manual for all MSHA operations. At all MSHA sites this hearing conservation program must be specifically followed.

2.0 PURPOSE

SIMON, Inc. employees must be protected from the effects of noise when sound levels exceed 85 decibels (dB) measured on the "A" scale of a standard sound level meter at the slow response over an 8 hour period. This hearing conservation program will be administered when employees are exposed to sound levels greater than 85 dbA on an 8-hour time-weighted average basis. The purpose of this document is to provide our employees with this protection and to comply with the OSHA Standard 29 CFR 1910.95 and MSHA Standard, 30 CFR Part 62. This document will be referred to as the Hearing Conservation Program or the HCP.

3.0 RESPONSIBILITIES

The HCP will be administered and reviewed periodically by the SIMON, Inc., HSE Department. The implementation and enforcement of site specific elements of the HCP will be by SIMON Management and Supervision.

4.0 PERMISSIBLE EXPOSURE LEVEL

4.1 No employee is to be exposed during any work shift to noise that exceeds the permissible exposure level. Refer to Appendix 44A.

4.2 If an employee's noise exposure continues to exceed the permissible exposure level despite the use of all feasible engineering and administrative controls, engineering and administrative controls must continue to be used to reduce the employee(s)' noise exposure to as low a level as possible.

4.3 No employee is to be exposed at any time to sound levels exceeding 115 dBA, as determined without adjustment for the use of any hearing protector.

5.0 NOISE MONITORING PROGRAM

5.1 The purpose of the Noise Monitoring Program is to identify employees who must be included in the Hearing Conservation Program (HCP) and to ensure the proper selection of hearing protectors is available.

5.1.1 Identification of employees for inclusion in the Program.

5.1.1.1 A sound level survey of each facility will be conducted annually. It is preferable that this survey be conducted at least thirty days prior to the annual hearing test project. The reason for this is to obtain baseline audiometric data on any employee who must be added to the HCP.

5.1.1.2 A sound level survey will be conducted when a significant change in equipment occurs.

5.1.1.3 A dosimetry study will be conducted for all areas in excess of 85 dBA Time Weighted Average (TWA) every two years, unless the results of the sound level survey indicate the need for this study at an earlier date.

5.1.2 Selection of personal hearing protectors.

5.1.2.1 Hearing protection **must** be worn by employees exposed to a 90dBA TWA or higher. It must be available to employees in the 85 dBA TWA to < 90 dBA TWA, but is not required unless the employee has experienced a Standard Threshold Shift (STS) or Reportable Hearing Loss (RHL) as determined by the Occupational Health Physician.

5.1.2.2 Hearing protectors must provide sufficient attenuation to achieve an equivalent TWA of 85 dBA or less when properly worn during noise exposure.

5.1.2.3 WARNING: The Noise Reduction Rating (NRR) listed on the protective device packaging is deceptive. This rating is laboratory derived under ideal conditions. At most you can expect to get no more than 50% of this rating in a real mining operation. NIOSH has recommended that:

(1) **Subtract 25% of the NRR value from ear muffs.**

(2) **Subtract 50% of the NRR value from formable ear plugs.**

(3) **Subtract 70% of the NRR value from all other ear plugs.**

5.1.2.4 In some instances of extremely high noise exposure, it is necessary to use both ear plugs and ear muffs to attain adequate protection for the employee. MSHA requires the use of both ear plugs and ear muffs whenever a miner's noise exposure exceeds 105 dBA TWA.

5.1.3 Areas identified as being 90 dBA TWA must be posted with signs stating (or other similar verbiage): **WARNING NOISE AREA**

6.0 HEARING HAZARD

6.1 Use of hearing protectors is required!

6.2 Sound level surveys will be conducted as follows:

6.2.1 A sound level meter will be factory, or equivalent, calibrated annually.

6.2.2 The meter will be calibrated on site prior to and after the survey is conducted.

6.2.3 The meter will be allowed to attain environmental equilibrium prior to being calibrated.

6.2.4 A map of the facility will be provided to the person conducting the survey.

6.2.5 All continuous, intermittent and impulsive sound levels from 80 dB to 130 dB will be integrated into the noise measurements.

6.2.6 A weighted and slow response setting will be used.

6.2.7 All employees exposed at or above an 85 dbA TWA will be notified of the survey results within 15 calendar days.

7.0 CONTROLS

7.1 Engineering controls are the preferred method for dealing with noise hazards. These controls eliminate the harmful noise through the use of quieter equipment, padding to reduce/eliminate vibration of enclosing the noise producing equipment in a noise containment chamber.

7.2 Administrative controls require the rotation of employees into and out of the noise hazard area in such a way that the employee is exposed to less than and 85 dBA TWA. The use of administrative control must not expose more employees to noise.

7.3 Personal hearing protection is the last and least effective noise control. It is the least effective due to the problems of enforcement, proper fit and adequate attenuation. NOTE: MSHA does not recognize personal hearing protection as an acceptable, permanent noise control method.

8.0 AUDIOMETRIC TEST PROGRAM

8.1 All employees exposed to an 85 dBA TWA or higher will have an annual audiogram completed at no cost to the employee. Other employees can receive an audiogram at the discretion of the company but these employees will not be entered into the HCP.

8.2 Audiometric testing will be conducted by a physician, a licensed/certified audiologist or by a CAOHC certified technician responsible to a physician or audiologist.

8.3 Audiometric testing must be conducted in a setting that complies with the following maximum background sound levels:

Octave Band Center Frequency (Hz)	**500**	**1000**	**2000**	**4000**	**6000**
Sound Pressure Level (dB)	**40**	**40**	**47**	**57**	**62**

8.4 The audiometers used must be exhaustively calibrated annually, and a biological and functional check must be performed prior the test session.

8.5 Baseline Audiograms will be obtained:

8.5.1 Within six months of an employee's first exposure at or above the action level (85 dBA TWA).

Or

8.5.2 When using a mobile test van, within one year of the first exposure at or above the action level. However, any exposure at or above the action level past the first six months requires the use of hearing protection.

8.5.3 Following fourteen hours without exposure to workplace noise. The employee(s) must be notified to avoid high levels of non-occupational noise during the fourteen hour period. For example, gun fire, loud music, chain saws, motorcycles, auto racing, snowmobiles, power tools, lawn mowers, any sound where a person must raise their voice to be heard 3 feet away, etc.

8.6 Annual audiograms must be obtained for each employee in the HCP and cannot exceed a 12 month interval.

8.6.1 The annual audiogram will be compared to the baseline audiogram for the following:

8.6.1.1 Validity

8.6.1.2 Whether or not an STS or RHL has occurred.

8.6.1.3 Indication of medical pathology.

8.6.1.4 Baseline revision. The annual baseline can be revised when in the judgment of the physician or audiologist the annual baseline reflects either:

(1) A persistent STS.

(2) A significant improvement over the previous baseline audiogram.

8.6.2 The evaluating physician or audiologist will determine if further testing is needed.

8.7 The company contracted to perform the audiograms is responsible for ensuring that the physician/audiologist is provided with:

8.7.1 A copy of the requirements for hearing conservation.

8.7.2 The baseline audiogram and the most recent audiogram.

8.7.3 Records of audiometer calibrations.

8.8 All audiograms must be pure tone, air conduction examination which include as a minimum 500, 1000, 2000, 4000, and 6000 Hz. Tests will be conducted at each frequency separately for each ear.

8.9 Audiometers will meet the specifications of, and are maintained and used in accordance with American National Standard Specification for Audiometers, S3.6-1996.

8.10 Employees will be notified of the preliminary results following the hearing tests (i.e., Better, Worse, No Change, STS).

9.0 STANDARD THRESHOLD SHIFT (STS)

9.1 A Standard Threshold Shift (STS) exists when the average hearing thresholds at 2000, 3000 and 4000 Hz equals or exceeds 10 dB, allowing for age.

9.2 An employee who is identified as experiencing an STS must:

9.2.1 Be notified in writing within 10 working days.

9.2.2 If not using hearing protection (exposure level 85 dBA TWA to < 90 dBA TWA), will be fitted with hearing protection, trained in their use and care, and **required** to wear them.

9.2.3 If already using protection the employee must be refitted and retrained in the use of protection and provided with hearing protectors offering greater attenuation, if necessary, within 30 days.

9.2.4 Be referred for a clinical audiological evaluation or otological examination if additional testing is deemed necessary or if the mine operator suspects that a medical pathology of the ear is caused or aggravated by wearing hearing protection.

9.2.5 Be retested within 30 days to confirm or repeal the STS.

9.3 If the retest confirms the STS, the employee must be notified and items 9.2.1 through 9.2.5 remain effective for that employee.

9.4 If the retest repeals the STS, the employee must be notified, and if exposure is under 90 dBA TWA, they may discontinue the use of hearing protection.

10.0 REPORTABLE HEARING LOSS (RHL)

10.1 A Reportable Hearing Loss exists when the average hearing thresholds at 2000, 3000, and 4000 Hz equals or exceeds 25 dB. Allowance for age is permitted.

10.2 Employee will be notified in writing within 10 working days.

10.2.1 If not using hearing protection (exposure level 85 dBA TWA to < 90 dBA TWA) will be fitted with hearing protection, trained in their use and care, and **required** to wear them.

10.2.2 If already using protection the employee must be refitted and retrained in the use of protection and provided with hearing protectors offering greater attenuation, if necessary.

10.2.3 Be referred for a clinical audiological evaluation or otological examination if additional testing is deemed necessary or if the mine operator suspects that a medical pathology of the ear is caused or aggravated by wearing hearing protection.

10.2.4 Report the loss in accordance with part 50 of Title 30 of the Code of Federal Regulations.

10.2.5 Be retested within 30 days to confirm or repeat the RHL.

10.3 If the retest confirms the RHL, the employee must be notified and items **10.2.1** through **10.2.5** remain in effect for that employee.

10.4 If the retest repeals the hearing loss, the employee must be notified, and if exposure is under 90 dBA TWA, they may discontinue the use of hearing protection.

11.0 PERSONAL HEARING PROTECTION

11.1 A variety of hearing protection will be made available at no cost to employees exposed to an 85 dBA TWA.

11.2 These protective devices will be replaced as necessary also at no cost to the employee.

11.3 Employees may use these devices when exposed to non-occupational noise levels.

11.4 Hearing protection is **mandatory** for employees who:

11.4.1 Are exposed to a 90 dBA TWA or greater.

11.4.2 Are exposed to an 85 dBA TWA to < 90 dBA TWA but who have not had a baseline test.

11.4.3 Are exposed to an 85 dBA TWA to < 90 dBA TWA and have experienced an STS or RHL.

11.5 Employees will be allowed to choose their hearing protection from at least two muff types and two plug types. In the event dual-hearing protection is required (105 dBA TWA), a choice of one of each type.

11.6 Training in the use and care of these devices will be provided.

11.7 Proper initial fitting will be explained, demonstrated and observed for each employee enrolled in the HCP.

11.8 Hearing protection must attenuate employee exposure to at least an 85 dBA TWA.

11.9 Hearing protection adequacy will be re-evaluated whenever the employee's noise exposure either increases to the point where the protection may not be adequate or decreases to the point where the protection may be excessive.

11.10 Hearing protection fit testing will be administered to any employee in the HCP whose annual test reveals:

11.10.1 An STS.

11.10.2 An imminent STS. This is an average within 2.5 dB of an STS.

11.10.3 An RHL.

11.10.4 An imminent RHL. This is an average within 5 dB of an RHL.

11.10.5 Worse test results two years in a row for a single ear.

12.0 TRAINING PROGRAM

12.1 Annual training will be conducted and updated as needed to cover changes in PPE and work processes, and will cover the following:

12.1.1 The effects of noise on hearing.

12.1.2 The purpose and value of wearing hearing protectors.

12.1.3 The advantages, disadvantages and attenuation of the offered hearing protectors.

12.1.4 Selection, fitting, use and care of hearing protectors.

12.1.5 The general requirements of the MSHA Occupational Noise Exposure rules, (30 CFR, Part 62) and OSHA 29 CFR 1910.95.

12.1.6 The respective tasks in maintaining noise controls.

12.1.7 The purpose and value of audiometric testing.

12.1.8 An explanation of testing procedures.

12.2 Copies of training material will be made available to affected employees or their representatives.

13.0 RECORDKEEPING

13.1 Noise exposure records will be retained for at least three years. These records will be maintained by SIMON, Inc. HSE Department.

13.2 Audiometric test records will be retained for the duration of the employee's employment and must contain:

13.2.1 The name of the employee.

13.2.2 The job classification of the employee.

13.2.3 The examiner's name.

13.2.4 The date of the last acoustic or exhaustion calibration of the audiometer. These records are maintained by the contracted audiometric service provider.

13.2.5 The employee's most recent noise exposure assessment.

13.3 Audiometric test records and audiograms are classified as employee medical records. These records will be maintained by SIMON, Inc. Human Resources Department.

13.4 Records must be provided upon request to employees, former employees, representatives designated by the employee, MSHA and OSHA officials, and the U.S. Assistant Secretary of Labor.

13.5 Upon termination of employment, the employee must be provided, at no cost, a copy of all records for that individual.

13.6 Should the owner cease to do business, records will be transferred to any successor employer.

14.0 MISCELLANEOUS

14.1 Methods for age corrections to audiograms can be found in Table 62-3 and 62-4 of the MSHA Standard, (30 CFR, and Part 62).

14.2 Noise exposure computations can be found in the MSHA Standard for Noise Rule 10 and 11 or Appendix A to the OSHA Noise Standard, (29 CFR 1910.95).

MAXIMUM DAILY DURATION BY NOISE EXPOSURE	APPENDIX 44A	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

MAXIMUM DAILY DURATION BY NOISE EXPOSURE

TABLE 62-1 REFERENCE DURATION							
Noise (dBA)		**Duration (hours)**		**Noise (dBA)**		**Duration (hours)**	
80		32.0		98		2.6	
81		27.9		99		2.3	
82		24.3		100		2.0	
83		21.1		101		1.7	
84		16.4		102		1.5	
85		16.0		103		1.3	
86		13.9		104		1.1	
87		12.1		105		1.0	
88		10.6		106		0.87	
89		9.2		107		0.76	
90		8.0		108		0.66	
91		7.0		109		0.57	
92		6.1		110		0.50	
93		5.3		111		0.44	
94		4.6		112		0.38	
95		4.0		113		0.33	
96		3.5		114		0.29	
97		3.0		115		0.25	
At no time shall any excursion exceed 115 dBA.							

TABLE 62-2 "DOSE"/TWA EQUIVALENT			
Dose (Percent)	**TWA_8 (dBA)**	**Dose (Percent)**	**TWA_8 (dBA)**
25	80	303	98
29	81	350	99
33	82	400	100
38	83	460	101
44	84	530	102
50	85	610	103
57	86	700	104
66	87	800	105
76	88	920	106
87	89	1056	107
100	90	1213	108
115	91	1393	109
132	92	1600	110
152	93	1838	111
174	94	2111	112
200	95	2425	113
230	96	2786	114
264	97	3200	115
Interpolate between the values found in this table, or extend the table, by using the formula: $TWA_8 = 16.61 \log_{10} (D/100) + 90$.			

SUBCONTRACTOR SAFETY PRE-QUALIFICATION AND SAFE START	SECTION 45	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

SIMON' Subcontractor Pre-Qualification and Safe Start Program applies to all subcontractors working on any SIMON owned property and/or job-site for all work operations. This policy includes the following: Annual Requirements, The Subcontractor Pre-Qualification Checklist, and The Subcontractor Safe Start Document.

2.0 PURPOSE

The purpose of this program is to ensure that SIMON subcontractors have met a minimum level of HSE performance and SIMON' HSE expectations prior to commencing work operations on any SIMON owned property and/or job-site for all work operations. The minimum expectation set forth is to evaluate the subcontractor's pre-qualification based on their safety programs, safety training, and their HSE performance statistics.

3.0 GENERAL REQUIREMENTS

3.1 Annual Requirements. Every subcontractor must complete the SIMON Pre-Qualification process on an annual basis. It is the Responsibility of the Contract and Insurance Administrator to ensure this process is implemented.

3.2 Subcontractor Pre-Qualification. Before any subcontractor signs a subcontract agreement with SIMON, Inc., the subcontractor must satisfactorily complete the Pre-Qualification Checklist, and be approved by the Regional Manager. Failure of a subcontractor to complete the checklist in its entirety renders the subcontractor automatically ineligible to perform "any" work for SIMON, Inc. The subcontractor must show satisfactory performance within the safety metrics set forth in the Pre-Qualification Checklist, which includes safety training documentation, their safety programs, and safety statistics.

It is the responsibility of the Contract and Insurance Administrator to ensure that the subcontractor pre-qualification process is in place to approve subcontractors for work. The Safety Department can provide technical assistance to the Regional Manager when evaluating Subcontractor Pre-Qualification Checklists. The Pre-Qualification Checklist is in Appendix 45A of this program.

3.3 Subcontractor Safe Start Document/Checklist. The Subcontractor Safe Start Document (Appendix 45B) along with the SIMON Corporate Safety Manual must be forwarded to each subcontractor with the Pre-Qualification checklist. It is the responsibility of the Regional Manager to ensure this process is in place in their respective Region.

It is the responsibility of the Project Manager to ensure that pre-qualified subcontractors have been met with on an annual basis and the Subcontractor Safe Start Document be reviewed in its entirety with designated subcontractor representatives as well as a review of all other mandatory HSE requirements. This can be done as part of pre-job meetings, job kick-off meetings, spring subcontractor meetings, and during on-site orientations. The subcontractor representative must sign-off on the subcontractor safe start document/checklist.

3.4 Insurance Requirements. Every subcontractor must meet the minimum insurance requirements as required by SIMON, Inc. Failure by the subcontractor to meet the minimum insurance requirements deems the subcontractor ineligible to perform work for SIMON, Inc.

3.5 Subcontractor Inclusion at the Work Place. As part of the SIMON safety program it is the responsibility of the Project Superintendent to ensure that subcontractors are conducting job tool-box safety meetings, job safety analysis, job hazard assessments, and included in job-site HSE inspections.

3.6 Post-Job Performance. It is the responsibility of the Project Manager to ensure that post-job safety performance reviews are completed for the subcontractors at the completion of each job. Subcontractors failing to meet the minimum requirements set forth in this program and failure to comply with SIMON HSE policy at the workplace will prohibit the subcontractor from performing work for SIMON, Inc. as determined by the President and CEO.

SUBCONTRACTOR SAFETY PREQUALIFICATION CHECKLIST

This checklist is required to be completed for evaluation by SIMON for your Prequalification. If any of the information (listed below) is not submitted, your Firm's status will be designated as **Failed Minimum Requirements, and you will not be eligible to work for SIMON, Inc.**

1. Contractor Information

Company Name: _____

Company Address: _____

Phone: _____ Fax: _____

Person Completing: _____ E-Mail: _____

Worker's Compensation Carrier: _____ Policy Exp. Date: _____

Type of Work Performed: _____

2. EMR, OSHA Recordable and Lost Time Information

Worker's Compensation Insurance – Experience Modification Rate (EMR)

1. Obtain from your insurance agent your EMR for the current policy year and two prior years. Then complete the following data:

Year	EMR	Effective Dates

Furnish a copy of your firms OSHA 300 and 300 A log from the previous calendar year.

Have you had any work-related fatalities in the past 3 years? ____ If so, provide a summary w/details on separate pages.

Have you received any Federal OSHA and/or State OSHA citations in the past 5 years?

YES ____ NO _____

2. If yes, provide descriptions, and type of citations (provide attachment if necessary):

_____

_____

_____

Safety Program:

Do you hold safety meetings for:	**Yes**	**No**	**Frequency***	**Title of Person conducting meeting**
Field Supervisors?				
Employees?				
New Hires?				
Subcontractors?				

***A=Annually; D=Daily; M=Monthly; N=None; Q=Quarterly; S=Semiannually; W=Weekly**

1. Do you conduct job-site safety inspections and Audits? Yes_____No_____Frequency * _____
2. Do you have a written safety program/policies/and procedures? Yes____No____

List specific safety training courses and/or seminars that Supervisors and employees have completed in the past 3 years (i.e.- OSHA 10-Hour Course, Rigging, Trenching/Excavation, ATSSA Technician, CCO Crane Certification, First-Aid/CPR, etc.) that will be working on SIMON, Inc. projects, provide attachments if necessary:

No.	**Safety Course**	**Hours of Course**	**Employee Position(s)**
1.			
2.			
3.			
4.			
5.			

The SIMON, Inc. Subcontractor Safe Start Document is included with this Subcontractor Safety Prequalification Checklist. As a subcontractor, it is your responsibility to review this checklist, and you are required to comply with all items as identified on the Subcontractor Safe Start Document.

Signature below by a company manager signifies that all information contained herein is accurate and correct, and in addition to it is an acknowledgement that all items in the Subcontractor Safe Start Document are understood and will be met if Prequalification to do work with SIMON is approved.

Name and Title of Person Completing Questionnaire: _____

Signature of Completing Person: _____ Date: _____

SUBCONTRACTOR SAFE START DOCUMENT:	APPENDIX 45B	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 3

SUBCONTRACTOR SAFE START DOCUMENT

SAFE-START REQUIREMENTS: Check each box when completed, Mark N/A where not applicable.

- ❑ **Subcontractor Safety Program –** Copy of Subcontractor Safety Program required to be submitted to SIMON Point-of-Contact and will be retained on file with SIMON, Inc. at the project.
- ❑ **Accident/Incident/Near Miss Reporting–** SIMON' Point-of-Contact must be notified immediately of all accidents/incidents/and near misses on the project, other than "minor" injuries (i.e., scratch or nick). Section 5 (**ACCIDENT/INCIDENT/CRISIS RESPONSE**) of the SIMON Corporate Safety Manual.
- ❑ **Aerial Lift and Scissors Lift (if applicable) –** employee training required for all lift work. This includes fall protection training pertaining to tying off to lift.
- ❑ **Backing Policy-** Subcontractors must comply with the SIMON backing policy. Section 7 (**BACKING POLICY**) of the SIMON Corporate Safety Manual.
- ❑ **Blasting Procedure–** only a Licensed Blaster shall be in charge of, and responsible for the preparation of, and the firing of a blast. A blasting plan must be submitted for approval according to State/Local Laws.
- ❑ **Contractor Safety Contacts-** Emergency contact information is required. Submit this information to your SIMON Point-of-Contact.
- ❑ **Competent Persons (excavation, confined spaces, etc.)**– Competent persons required to be on-site at all times. This is OSHA's competent person requirement.
- ❑ **Construction HSE Training–** Subcontractor employees must be trained/educated (subcontractor to maintain own documentation) in all areas as required by OSHA. For example:
  - ❑ Fall Protection.
  - ❑ Scaffolding.
  - ❑ Fire Extinguishers.
  - ❑ Ladders.
  - ❑ Hazard Communications.
  - ❑ Excavations.
  - ❑ Work Zone Safety.
  - ❑ General Construction Safety.
- ❑ **Cranes-** Cranes kept in compliance with OSHA Standards, including operators being licensed. Crane inspections from Subcontractor or rental agency must be submitted to SIMON prior to bringing on-site. SIMON Critical Lift procedure required to be followed per SIMON safety program. Refer to Section 10 (**CRANES**) of the SIMON Corporate Safety Manual.
- ❑ **Disciplinary Action Policy/Cell Phone Policy-** Section 6 (**DISCIPLINE POLICY**) of the SIMON Corporate Safety Manual.
- ❑ **Electrical–** all electrical equipment on projects/sites/plants/etc. must be on temporary GFCI; if working in an area with permanent power, employees must be utilizing GFCI pigtails. Section 11 (**ELECTRICAL SAFETY)** of the SIMON Corporate Safety Manual.

- ❑ **Fall Protection–** fall exposure greater than or equal to 6 feet = 100% tie-off, no exceptions to SIMON' 100% fall protection rule. This may include double lanyards, retractable lanyards, etc. Section 13 (**FALL PROTECTION**) of the SIMON Corporate Safety Manual.
- ❑ **First-Aid/CPR Certified Employees–** each subcontractor is required to have one trained employee on-site at all times.
- ❑ **Fork Lift Operator certification (if applicable) –** any employee operating a forklift must be certified. Includes Rough-Terrain and Industrial. Section 21 (**MOBILE EQUIPMENT AND CONSTRUCTION VEHICLES**).
- ❑ **Hazard Communications–** Chemical Inventory List is required with accompanying SDS's on-site at all times.
- ❑ **Hazardous/Out of the Ordinary Work –** must be coordinated with the SIMON Project Management Team prior to commencing so that all proper safety procedures are implemented into the process.
- ❑ **Job Safety Analysis**- will be required for all work tasks performed on any SIMON location.
- ❑ **OSHA Inspections-** In the event of an OSHA Compliance Officer showing up on the project, immediately notify the most senior SIMON Supervisor-In-Charge at the project. Section 23 (**OSHA/MSHA INSPECTIONS**) of SIMON Corporate Safety Manual.
- ❑ **Powder-Actuated Tool Certifications (if applicable) -** Employees must have certification card.
- ❑ **PPE Requirements**- All subcontractors at a minimum must comply with SIMON PPE requirements. Section 25 (**PERSONAL PROTECTIVE EQUIPMENT**) of SIMON Corporate Safety Manual.
- ❑ **Respiratory Protection certifications (if applicable) –** this includes medical surveillance, training/education documentation certification, and fit-testing. Section 29 (**RESPIRATORY PROTECTION**) of SIMON Safety Manual.
- ❑ **Safety Inspections-** The subcontractor will be inspected routinely by SIMON supervision and the SIMON HSE Department. The subcontractor is required to respond immediately to any HSE deficiencies, and in the cases where a formal written inspection report is generated the subcontractor is required to respond in writing back to the SIMON Point-Of-Contact within days as to how the deficiencies have been corrected.
- ❑ **Spills and Spill Kits-** Spill Kits are required for all company Trucks at all sites.
- ❑ **Utility One-Calls –** Subcontractors must have a valid Utility One-Call ticket before digging, drilling, or blasting. Subcontractors are not permitted to work off of a SIMON Utility One-Call ticket. Section 35 (**UNDERGROUND UTILITIES**) of the SIMON Corporate Safety Manual.
- ❑ **Weekly Toolbox Talks–** Subcontractors are required to be conducting weekly training meetings with their employees while performing work on SIMON sites (while on-site for 1 week or more) and providing SIMON with a copy of the Toolbox Talks. Required to SIMON Point-of-Contact.
- ❑ **Work Attire–** hard hats, 100% eye protection, long-pants covering the legs and ankles, t-shirts w/short sleeves, and safety toed boots.
- ❑ **Work Zone Safety**– compliance with DOT traffic control plan is mandatory. At a minimum, subcontractor employees working in a work zone/and or adjacent to vehicular traffic shall wear ANSI Class II Garments during the day time, and ANSI Class II Traffic vests for night work. Section 37 (**WORK ZONE SAFETY**) of SIMON Safety Manual.
    - ❑ **Marcellus Gas Well Sites and Road Work-** As a Subcontractor, you are required to check-in with your SIMON Point-Of-Contact prior to any Marcellus Gas Site Operations commencing to ensure that you are going to meet the minimum Gas Operator Specific HSE requirements. It is your responsibility as a subcontractor to get the required training for all of your employees as required by individual Gas Operators. Your SIMON Point-Of-Contact can assist you with all requirements as identified below.
    - ❑ **Training**- You must ensure that your employees receive the proper HSE training prior to commencing work on any gas operator site that requires a specific type of training; for example (this list is not all inclusive):
        - ❑ Spotter Training- required for work at all Shell Sites where there are overhead wires.
        - ❑ 8-Hour Safe land Training- Required for Anadarko and Shell
        - ❑ Spill/Rattlesnake Training- Required for work at Anadarko.
        - ❑ EXCO Resources- On-Site Safety Orientation provided by EXCO- 2 Hours
        - ❑ Range Resources- On-Site Safety Orientation.

- ❑ EOG Resources

- ❑ **No Smoking at Active Gas Sites.**
- ❑ **FR Clothing required at Active Gas Sites.**
- ❑ **Short-Service Employee Program required at Gas Sites, refer to SIMON Safety Manual**.

Company Name (subcontractor): _____

Employee Print Name: _____ Date: _____

Employee Signature: _____

Emergency Contacts: _____

SIMON, Inc. Supervisor's Name: _____

Signature: _____

WINTERIZATION PLAN	SECTION 46	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 2

1.0 SCOPE

This section sets forth the minimum requirements for handling adverse and extreme winter weather conditions at SIMON for all employees.

2.0 PURPOSE

The purpose of this section is to provide general requirements and safe practices to SIMON Supervisory personnel and employees during the winter months of operation as to prevent both vehicle accidents, slips/trips/falls, and frostbite.

3.0 GENERAL REQUIREMENTS

3.1 Clothing Requirements. All SIMON Supervisory personnel and employees will be provided with the following: gloves, hard hat liner, and ice-traction over-boot devices.

3.1.1 All SIMON Supervisory personnel will be provided a copy of our current Cold Weather Protection supplies poster for ordering purposes.

3.1.2 SIMON Supervisor must familiarize the crew via JSA with the Wind Chill Index at the end of this section. For Gas and Oil work, all outer protective garments MUST BE FR-rated as required by the Operator.

3.2 Job Site Conditions.

3.2.1 Walking Surfaces. It is the responsibility of the SIMON Supervisor to ensure that the following areas are suitable for walking as to prevent slips, trips, or falls: parking areas, around job trailers and job jonnies where foot traffic is anticipated, steps and landings.

Steps and landings must be cleared of snow and ice. Non-skid materials will be installed when cleared.

3.2.2 Visibility. Anytime a piece of equipment or person cannot be seen due to heavy snow (or fog), the SIMON Supervisor must temporarily cease all operations until conditions improve.

3.3 Equipment. The safe practice is to ensure that all Formen's trucks are equipped with the following: proper tire treading, tire chains (where applicable), radiator coolant for winter temperatures, and a functional cab heater.

3.3.1 All SIMON Supervisory personnel and drivers must be diligent in assuring that all cargo is secured.

3.3.2 All SIMON equipment operators must remove snow and ice from equipment steps and grab bars prior to mounting/dismounting equipment.

3.4 Planning for extreme conditions. The SIMON Supervisor must plan ahead for extreme weather conditions. This means that s/he has checked the weather forecast (snow and/or extreme cold temps), and makes the decision to either: Delay leave home and start times so that THE STATE/FEDERAL DOT has time to clear travel routes, or cancel work for the shift.

3.5 Journey Management. All SIMON employees are advised to maintain extra clothes (blanket, coat, etc.), adequate supply of drinking water, greater than ½ tank of gasoline, and a mobile phone within their vehicles while traveling to and from work during the cold months.

3.5.1 SIMON employees are advised to carpool whenever possible during the winter months.

3.5.2 All SIMON employees are required to inform their Supervisor of the daily commute routes and estimated times of arrival for those routes.

3.6 Stop-Work Point. It is responsibility of the SIMON Supervisor to stop work and send all employees home for the day when the weather changes to a point when there is reasonable expectation that traveling conditions will worsen and create a major safety hazard as the day progresses.

WIND CHILL INDEX

WIND SPEED MPH	WHAT THE THERMOMETER READS (degrees F.)											
	50	40	30	20	10	0	-10	-20	-30	-40	-50	-60
	WHAT IT EQUALSIN ITS EFFECT ON EXPOSED FLESH											
CALM	50	40	30	20	10	0	-10	-20	-30	-40	-50	-60
5	48	37	27	16	6	-5	-15	-26	-36	-47	-57	-68
10	40	28	16	4	-9	-21	-33	-46	-58	-70	-83	-95
15	36	22	9	-5	-18	-36	-45	-58	-72	-85	-99	-112
20	32	18	4	-10	-25	-39	-53	-67	-82	-96	-110	-121
25	30	16	0	-15	-29	-44	-59	-74	-88	-104	-118	-133
30	28	13	-2	-18	-33	-48	-63	-79	-94	-109	-125	-140
35	27	11	-4	-20	-35	-49	-67	-82	-98	-113	-129	-145
40	26	10	-6	-21	-37	-53	-69	-85	-100	-116	-132	-148

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GENERAL SAFETY: HEALTH PROVISIONS	SECTION 47	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

1.0 SCOPE

This section addresses multiple requirements as required by the OSHA General Provisions and as required by owner/clients who work with SIMON.

2.0 PURPOSE

The purpose of this section is to provide general requirements and safe practices to SIMON Supervisory personnel and employees as set forth in the OSHA general provisions.

3.0 GENERAL REQUIREMENTS

3.1 Competent Person Inspections. At SIMON, Inc. the competent person is defined throughout the Corporate Safety Manual Requirements, and in most cases is defined as the SIMON Supervisor-in-charge of the work operations. The competent person will ensure that materials and equipment are inspected frequently on his/her work operations. In addition to this, specific requirements for inspection are identified throughout the Corporate Safety Manual.

3.2 Qualified Employees to Operate Mobile Equipment or Machinery. Only qualified SIMON employees by training or experience are permitted to operate mobile equipment and machinery. This will be determined by the SIMON Supervisor-in-Charge. In addition to this, specific requirements for inspection are identified throughout the Corporate Safety Manual.

3.3 Recognition and Avoidance of Unsafe Conditions. Each employee at SIMON will be instructed in the recognition and avoidance of unsafe working conditions and the applicable regulations/policies/rules applicable to the work environment so he/she can control or eliminate any hazards or other exposure to illness or injury. In addition to this, specific requirements for inspection are identified throughout the Corporate Safety Manual.

INJURY AND ILLNESS RECORDKEEPING	SECTION 48	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

1.0 SCOPE

This section addresses multiple requirements as required by the OSHA for injury and illness recordkeeping.

2.0 PURPOSE

The purpose of this section is to outline requirements set forth by OSHA for injury and illness recordkeeping.

3.0 GENERAL REQUIREMENTS

3.1 Written Injury and Illness Records. SIMON will keep records of fatalities, injuries, and illnesses that are determined to be work-related, are new work injury cases, and meets one or more of the OSHA recordkeeping general criteria.

3.2 OSHA 300 Log. SIMON will record all injuries and illnesses when determined to be work-related on the OSHA 300 Log within seven calendar days of the determination. The OSHA Log will be signed by the SIMON Safety Director. A copy of the annual summary (OSHA 300 and 300A Log) will be posted at each establishment of SIMON in a conspicuous place or places where notices to employees (i.e. - lunch room) are typically posted. The posted annual summary is not to be altered, defaced, or covered by other materials when posted. The annual summary will be posted from February 1st through April 30th of each calendar year.

3.3 OSHA required 5-year retention of injury/illness records. The OSHA 300 Log, the annual summary, and accident report forms will be retained for five (5) years following the end of the calendar year that these records cover. This will be maintained by the Safety Department.

LOADING AND OFF-LOADING MATERIALS	SECTION 49	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

1.0 SCOPE

This section addresses working around construction materials being loaded and unloaded from any type of truck at any SIMON location or job-site. It includes any and all construction materials being loaded and off-loaded— for example, concrete jersey barrier, pipe, concrete forms, pallets of materials, rolls of geo-fabric, etc.

2.0 PURPOSE

The purpose of this policy is to provide some minimum criteria to restrict employees from being crushed or struck while working on the ground in proximity to trucks being loaded and off-loaded.

3.0 GENERAL REQUIREMENTS

3.1 Competent Person. At SIMON the competent person is defined as the SIMON Supervisor-in-charge of the work operation. The Supervisor-in-charge of the work operation where loading and off-loading is occurring is responsible to ensure that employees working around the trucks know all requirements of this policy and must ensure that employees are adhering to this policy.

3.2 Blind Spots. Any employee(s) working on the ground is required to know the blind spots of the operator and/or truck driver involved in the work operation, and the employee(s) is required to stay clear of these blind spots. If the employee on the ground cannot see the operator and/or truck driver and cannot get acknowledgement from that operator and/or truck driver, then the employee(s) needs to get out of the work area and stay clear of the work operation taking place, and in a safe area where he/she will not be in a crush-and-struck-by zone. Employees are not permitted to be in the blind zones of the operator and/or truck driver while loading and off-loading.

3.3 Crush-and Struck-By Zone. SIMON employees are required to pay attention to their positioning around material being loaded and off-loaded. Employees are required to stay clear of any area where they could be struck by and/or crushed if construction material were to fall off of, or fall out of any truck during loading and off-loading. Employees are required to be in a safe area so that if material does fall or come off of the truck, the employee(s) would be free and clear of being crushed or struck by the material.

3.4 Standing Adjacent To a Loaded Truck. SIMON employees are only permitted to be adjacent to a truck when there is 100% certainty that the material is loaded and secured properly, and that there is no risk to any employee standing adjacent to a truck.

JOB COMPETENCY	SECTION 50	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

1.0 SCOPE

This section encompasses basic competency requirements as required by SIMON.

2.0 PURPOSE

The purpose of this policy is to provide minimum general criteria for SIMON Supervisors to utilize as a basic guideline when determining employee competency.

3.0 GENERAL REQUIREMENTS

3.1 Organizational Chart. An organizational chart will be developed and maintained that includes job titles/roles for defined positions.

3.2 Job Descriptions. Job descriptions will include the minimum qualification requirements for each position/role for all field operations.

3.3 Job Qualification. With regard to all occupational safety and health-related aspects of an employee's job, documentation is obtained from employees, as well as maintained for all employees to demonstrate that the employee meets the qualifications for their job—for example, Certified Crane Operator (CCO) License will be maintained, as well as Fork Lift Operator Qualification, Aerial Lift, Physical Capacity Screening, D.O.T. Physical, etc.

3.4 Job-Specific Training. It is the responsibility of the SIMON Supervision to provide job specific training related to field employees' roles and responsibilities.

3.5 Competency. As part of SIMON' Short-Service Employee program, SIMON supervision are required to verify employee competency before performing tasks independently. This can be completed by some of the following but not limited to: Operator Assessment, Crane Operator Certification, Field Supervisor's Safety Orientation, Job Hazard Assessments, and completed on the SIMON Job Competency Assurance form located in Section 41A (**REMOVAL FORM AND COMPETENCY CHECKLIST)** of this manual. An example of competency assurance would be a SIMON Flagger completing the "Hands-On" portion of the Flagger course. The Flagger must be able to demonstrate competency for flagging operations.

STOP WORK AUTHORITY	SECTION 51	
	EFFECTIVE DATE January 3, 2022	PAGE 1 of 1

1.0 SCOPE

This program identifies the right, responsibility, and duty of all SIMON employees to intervene in HSE issues and identifies all requirements specific to any employee's "Stop Work Authority."

2.0 PURPOSE

The purpose of this program is to establish a general protocol for all employees to have the authority and duty to intervene without retribution to Stop Work when there is an HSE risk not clearly established, understood, or when there is a recognized hazard. It is also imperative and required for the HSE concerns to have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.

3.0 GENERAL REQUIREMENTS

3.1 Employee Right, Responsibility, and Duty to Intervene. All SIMON employees have the right, responsibility, and duty to intervene in unsafe acts and conditions or when work activities are not in compliance with the Corporate Safety Program. Employees are required to be actively involved in the safety hazard identification process which is required of all employees at all times during work operations.

3.2 Training. All employees will be instructed on SIMON' **Stop Work Authority** policy as part of their New Hire Orientation process.

3.3 Authority to Stop Work. All employees have the authority to stop work when the control of the HSE risk is not clearly established, understood, or when there is a recognized hazard. Employees will not be reprimanded or disciplined for issuing a Stop Work Intervention for an HSE issue.

3.4 Resuming Work after a Stoppage. Prior to the commencement of operations, all issues and concerns are required to be addressed satisfactorily by the SIMON Supervisor.

3.5 SIMON Supervisor Responsibility. SIMON Supervisors are responsible to create a culture where Stop Work Authority is exercised freely.

3.6 Stop, Notify, Correct, and Resume. When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the SIMON Supervisor, and initiated in a positive manner. Notify all affected personnel and supervision of the stop work issue, correct the issue, and resume work when safe to do so.

3.7 Documentation. All Stop Work Interventions will be documented and reviewed by the SIMON Supervisor(s) in charge and submitted as a CLOSE CALL.

MOTOR VEHICLE POLICY	SECTION 52	
	EFFECTIVE DATE July 3, 2022	PAGE 1 of 14

1.0 SCOPE AND PURPOSE

This policy applies to Colas companies operating in the United Sates. Expanding mobility and improving Road Safety (a global health issue for people) is a core part of our mission as an organization.

1.1 This policy applies to employees:

a. Responsible for implementing procedures detailed herein, and
b. Operating licensed motor vehicles.

Operating includes personal vehicles used for a business purpose and personal trips using company-owned, leased, or rented vehicles.

1.2 This policy does not apply to unlicensed vehicles, construction equipment, or off-road vehicles.

This policy may be adopted directly as written or implemented as part of a subsidiary-branded program.

2.0 DEFINITIONS[1]

- *Accident*

An unplanned or unintended event or series of events that may result in: (a) personal injury or death; (b) damage to a system or service; (c) environmental damage; (d) adverse effects on an activity or function.

- *Aggressive Driving*

Driving in a selfish, bold, or pushy manner disregarding the rights or safety of users of the road.

- *Collision*

An incident in which the first harmful event involves a motor vehicle in motion contacting another vehicle, other property, person(s) or animal(s).

- *Crash*

An incident that involves one or more motor vehicles in motion.

- *Defensive Driving*

Driving to save lives, time, and money, despite conditions and/or the actions of others.

[1] American National Standard Z15.1-2017 Safe Practices for Motor Vehicle Operations

- *Distracted Driving*

Diversion of the driver's attention from the task of operating a motor vehicle by activities, objects, or events inside or outside the vehicle, or by other factors such as emotional stress or preoccupation

- *Driver*

The individual responsible for the safe control of the motor vehicle.

- *Eco Driving*

Ecodriving is a modern and efficient way of driving that emphasizes fuel efficiency, speed, and safety.

- *Incident*

Event that causes or could result in personal harm, property, or environmental damage.

- *Incident Rate*

The number of incidents per some unit of measurement for the purpose of assessing safety performance over time or comparing performance with other organizations.

- *Injury*

Physical harm or damage to a person resulting in personal discomfort, bodily harm or impairment, death and/or the marring of appearance.

- *Motor Vehicle*

Any licensed mechanically or electrically powered device, not operated on rails, designed to be operated primarily on public roads or streets. Cargo and/or attachments (trailers, etc.) to a motor vehicle are considered part of that vehicle.

- *Motor Vehicle Record (MVR)*

A motor vehicle record (MVR) is the documentation of a person's driving history. The information in an MVR includes information about the driver's traffic citations, vehicular crimes, accidents, driving under the influence (DUI) convictions and the number of points on the individual's driver's license.

- *Organizational vehicle*

Any vehicle owned, leased, or rented on behalf of the organization.

- *Passenger*

A person, other than the driver of the vehicle, who is in or on a motor vehicle.

- *Preventable Collision*

A preventable collision is one which the driver failed to take reasonable actions or precautions to avoid.

- *Remedial Training*

Training required following an incident to upgrade or renew skills and demonstrate proficiency.

- *Road Rage*

A criminal offense in which a vehicle is used as a weapon to do harm, or as an instrument to physically assault a driver, pedestrian, vehicle, or property.

- *Serious Accident*

A crash that results in a fatality, serious injury, or property damage exceeding $100,000. A serious injury is life-threatening or life-altering.

3.0 MANAGEMENT, LEADERSHIP AND ADMINISTRATION

Management Leadership and Commitment

Senior leaders shall provide the staff and financial resources to implement activities outlined herein.

- Colas Inc. Fleet Safety Committee

The Fleet Safety Committee is responsible for the content and distribution of this Policy. Committee Members are listed in **Attachment 1**.

The Committee is also responsible for the following ongoing activities:

- Reviewing serious accidents and the organization's overall driver safety record.
- Recommending corrective action (training, equipment changes, etc.) to improve performance.
- Making recommendations when individual driving privileges should be suspended or revoked.
- Reviewing all other issues that arise with respect to motor vehicle operations.
- Revising the ***Road Safety Action Plan*** producing the annual ***Road Safety Report***.

- Senior Leadership/Subsidiaries

Subsidiaries should establish their own Fleet Safety Committee or assign activities consistent to those listed above to an existing management team. Members should include Operations, Human Resources, Equipment, and Safety with sufficient seniority/authority to implement organizational changes.

Each subsidiary will prepare its own ***Road Safety Report*** summarizing performance and prevention activities. This report will summarize actions completed, provide statistical results, and itemize actions target objectives for the following year. The report should be completed/submitted by January 7th.

Senior Leaders must hold Operations, Human Resources, Equipment, and Safety staff accountable for their assigned duties under this policy.

HR initiates the driver selection process by collecting background information, interviewing applicants, and confirming that prospective candidates meet our hiring standards. This includes MVR reviews (Motor Vehicle Records) and pre-employment drug testing as permitted by state law for all job descriptions that may include any type of driving.

A candidate's license that is active with no citations, violations, or restrictions is ***Clean*** and acceptable.

A candidate's license that is active but has **Activity** (citations, violations, or restrictions) must be reviewed by HR to see if the candidate meets our ***Driver Selection Criteria*** (**Attachment 2**).

Candidates that require a Commercial Driver's License (CDL) must demonstrate competence during a ***Ride Along*** (behind the wheel observation). The employee observing the ***Ride Along*** must be a qualified CDL Driver authorized by the company.

Managers and supervisors are responsible for monitoring for compliance with these rules.

Drivers in violation of these safety rules shall be counseled or disciplined in a fair and uniform manner.

HR is responsible for recordkeeping associated with any disciplinary actions or counseling sessions.

Safety is responsible for safety communications, driver training, workplace inspections, and performing periodic audits to ensure that all managers, supervisors, and drivers are aware of these rules.

Distracted Driving

Do not multitask while driving. Whether it's adjusting your mirrors, picking the music, eating a sandwich, making a phone call, typing, or reading a message—do it before or after your trip, not during.

Additional information related to our company policy regarding Distracted Driving is provided on the section titled Operational Environment.

Wearing Seatbelts

- Occupant restraints or seatbelts are mandatory for drivers and all passengers.
    - *Backing*
- Driving any motor vehicle in reverse must be avoided whenever possible.
- Backing vehicles with an obstructed view to the rear without an operating reverse signal alarm is prohibited. The signal alarm must audible above the surrounding noise level.
- Do not back up if pedestrians are in proximity unless a predetermined observer signals it is safe.
    - *Parking*
- Park in a ***First-Move-Forward*** position so you can exit the space without backing.
- Practice ***Pull Through Parking*** where you pull through one spot into an adjoining space.
- Safely back into a parking space if ***Pull Through Parking*** is not a viable option.
- If ***Head-In Parking*** is necessary, then ***Get Out and Look (GOAL)*** before pulling out in reverse - walk around the rear of the vehicle before getting in to ensure that it will be safe to back out.

Securing All Loads

- Follow specified procedures for transporting heavy equipment and secure all tools and cargo.
- Secure objects inside the vehicle that could become a potential projectile; phones, laptops, toolboxes, groceries, backpacks, cameras, books, food, and anything else that you'd normally carry alone can be sent flying during a collision.
    - *Security*
- Drivers are responsible for the security of vehicles and cargo. Lock an unattended vehicle.
- Keys must never be left in the vehicle. Spare keys are to be kept in the office or at your home.
- Materials must not be left in plain view where they may be susceptible to theft or damage.
    - *Speeding*
- Observe posted speed limits and rules of the road.
- Radar detectors or electronic jamming devices are prohibited.
    - *Inspections & Maintenance*
- [reserved]
    - *Impairment*
- Do not use controlled substances or alcohol prior to operating a motor vehicle. Be aware of possible adverse effects of prescription drugs and do not operate when ability is impaired.
    - *Authority*
- Only company authorized drivers are permitted to drive company vehicles.

- *Visibility*

- Keep windows clean inside and out to reduce glare.
- Remove snow accumulation prior to driving - includes snow from on top of the vehicle and all windows and lights.

- *Following Distance*

- Maintain 4 seconds of following distance between your vehicle and other vehicles (passenger vehicles), 5 to 8 seconds in heavy/long combination vehicles and move slightly slower than the flow of traffic in heavy traffic.

- Maintain awareness of what is in front of your vehicle, on both sides, and behind to reduce the need for sudden stops or quick lane changes which can make it more likely other vehicles with strike your vehicle.

- *Fatigue*

DOT regulated drivers (CDL and Non-CDL holders) must comply with interstate (FMCSA) or intrastate (State DOT) regulations and track hours of service as instructed. Drivers of non-regulated vehicles are expected to use appropriate judgement in following these expectations without recordkeeping.

Our expectations are as follows:

- Not driving after being on duty 14 hours or longer
- Not driving more than 11 hours of the 14 hours maximum on duty time
- Not driving more than 60 hours in a work week
- Taking a break of at least 30 minutes prior to driving 8 hours of the maximum 11

Drivers are not to operate vehicles when fatigued even if they haven't exceeded these limits.

- *Vehicle Operations in Inclement Weather*

Drivers should review weather forecasts and not operate motor vehicles in conditions in which driving too hazardous. Take extra precautions during bad weather including:

- Moving slower than the posted speed limit based on road conditions
- Allow extra following distance when conditions indicate longer stopping distances may exist
- Not driving through flooded areas or roadways
- Conducting pre-trip inspections, including checking levels of wiper fluid
- Having proper equipment, such as snow and ice removal equipment, based on the climate
- Verifying the heat and defroster systems in the vehicle are in working order
- Using lights when visibility is limited and when wipers are needed
- Not driving into fog, smoke, or whiteout conditions

Driving status will be confirmed to employees as part of the onboarding process. Authorized Drivers should review and become familiar with **Attachments 3, 4, 5 ,6 & 7**, as applicable.

Authorized Drivers should complete Liberty Mutual' s Decision Driver Training course within their first six months of employment. Classroom training may be scheduled by the Safety Department or a series of online training sessions may be assigned by HR through the ColasWay Learning Management System.

Selected drivers will participate in a Commentary Drive, which is an on-road exercise to evaluate skills learned through the Decision Driver Training course.

DOT Regulated Drivers will be assigned specific training courses according to their job duties. The list of CDL/CMV Driver Training Courses is included as Attachment 8.

Drivers are required to report all motor vehicle incidents. Drivers should report incidents to their immediate supervisor as soon as the occur and follow instructions. Supervisors shall ensure that all incident reports are recorded in designated electronic reporting systems. Statistics and information related to motor vehicle incidents will be reported up to Senior Leadership.

Individual crashes or incidents that results in a fatality, serious injury, or property damage exceeding $100,000 shall be reported to Senior Leadership by telephone, text, or email as soon as the situation is stabilized, and pertinent details are confirmed.

Each crash shall be investigated to determine if it was a Preventable Collision. The finding must be recorded in Cority so the percentage of Preventable crashes can be reported to Senior Leadership.

Every crash that involves a third party will be factored-in to the annual Road Safety Index (RSI). The RSI is calculated by dividing the number of crashes involving a third party (regardless of fault) over a twelve-month period by the total number of vehicles in the fleet.

Counts will be maintained for Crashes with a third party, Animal Strikes, Property Damage >$5,000, Property Damage <$5,000, and Other Incidents.

- *Communications*
- Information related to the operation of licensed motor vehicles will be shared with stakeholders through different channels based on the subject matter and the intended audience.

Changes to motor vehicle policies, procedures, and management processes *will be shared during business planning and budget review meetings.* Action Plans and performance data will be shared during budget review or business planning meetings.

- New policies and procedures should be shared with general audiences during Yearly Kick Off Meetings, on the job (crew level Safety Meetings or Toolbox Talks), or via written correspondence.
- Email, newsletters, and social media will also be used to inform and engage stakeholders.

External communications regarding this Motor Vehicle Operations Policy or any incidents that occur involving company vehicles shall be coordinated by authorized personnel only.

- *Regulatory Compliance Management*

Safety Managers are responsible for monitoring overall changes to commercial and noncommercial motor vehicle laws and initiating necessary changes to motor vehicle policies, procedures, and driver/administrator training programs.

Safety Managers will ensure that Motor Carrier Registration and Insurance requirements are up to date.

Equipment Managers will be responsible for maintaining compliance with rules specific to Commercial Motor Vehicles including inspections, maintenance, repairs, and associated recordkeeping.

Human Resources Managers will be responsible for maintaining current driver's license information (including updates for renewals) and Commercial Driver Qualification Files. In addition, HR will manage the drug and alcohol testing program.

Managers and Supervisors are responsible for monitoring their drivers to ensure compliance with applicable laws and company safety rules (e.g., hours of service, impaired driving, distracted driving, speeding, etc.). This includes making sure that only Authorized Drivers operate licensed motor vehicles.

Beyond assigned duties, managers and supervisors are accountable for modeling safe driving behaviors.

- *Management Program Audits*

Periodic Road Safety Assessments will be performed by Liberty Mutual Insurance Risk Control Services. Typically, operating companies will be evaluated on a three-year cycle.

The assessments focus on the following areas to help identify opportunities for improvement:

1. Management Support & Direction
2. Safety Organization
3. Driver Selection & Qualification
4. Driver Orientation, Training & Supervision
5. Vehicle Crash Reporting, Recording & Review
6. Vehicle Maintenance & Specifications
7. Technology – Telematics/GPS
8. Interviews of Management and Drivers
9. Gate Checks

Subsidiaries should formally update their Road Safety Improvement Action Plans following the audit.

- Operations Managers

Supervisors are expected to verify that a driver is on the list of authorized drivers prior to assigning him/her tasks related to motor vehicle operations.

Supervisors shall coach or discipline drivers violating any of or our driving and vehicle safety rules. This includes administrative responsibilities like providing driver qualification records, performing daily vehicle inspections, following hours of service requirements, and accident reporting.

- Human Resources

HR handles paperwork and background checks during the employee onboarding or transfer process.

HR will confirm that a candidate's MVR meets our ***Driving Record Criteria***. If it does not, then a Senior Leader may review the MVR and issue an ***Exception*** to hire a particular candidate.

HR will track ***Authorized Drivers*** using the following categories:

1. ***DOT Regulated CDL Driver***
2. ***DOT Regulated Non-CDL Driver*** — Monitored Monthly
3. ***Non-Regulated Driver-Monitored*** — Monitored Monthly
4. ***Non-Regulated Driver – monitored periodically***

An employee who is not listed in one of these four categories is a ***Non-Driver***.

Driver status will be transferred into the ***Third Party Administrator's (TPA)*** system during the onboarding process.

The TPA's automatic monitoring feature must be activated for drivers in Categories 1 and 2. Automated monitoring will also be activated for individuals in Category 3.

Category 3 drivers include:

- Drivers granted a hiring ***Exception*** - until their MVR meets our ***Driving Record Criteria***.
- Drivers given permission to use a Company vehicle for personal business.
- Drivers selected for monitoring by management for any other reason.

Commercial Driver Qualification Files will be maintained by assigned staff for Categories 1 and 2.

Records for Non-Regulated Drivers will reside in designated systems.

HR is responsible for incorporating driving responsibilities into written Job descriptions.

4.0 OPERATIONAL ENVIRONMENT

- ### Occupant Restraints (Seatbelts)

Regardless of state laws, drivers and all passengers must wear seatbelts. Carrying passengers in a vehicle that does not provide a seat with a seatbelt for everyone is prohibited.

- ### Impaired Driving (Substance Abuse)

Driving a Company Vehicle in violation of the applicable state laws pertaining to the use of alcohol or controlled substances is strictly prohibited.

Colas maintains two separate policies regarding the use of alcohol, legal or illegal drugs or substances, and prescription and non-prescription medications that adversely affect the ability to safely operate a motor vehicle:

1. Non-DOT Drug-Free Workplace Policy
2. Controlled Substances and Alcohol Misuse Testing Policy[2]

These policies specify procedures for post-accident testing when drivers are involved in a collision or serious motor vehicle accident.

- ### Distracted Driving (Cellular Phones and Electronic Devices Usage)

The catastrophic consequences of distracted driving grow higher each year. Drivers are expected to keep their eyes on the road, keep their hands on the wheel, and keep their mind on driving.

[2] Complies with U.S. DOT Federal Motor Carrier Safety Administration (FMCSA) Regulations

Anything that takes your attention away from driving can be a distraction. Sending a text message, talking on a cell phone, using a navigation system, and eating while driving are a few examples of distracted driving. Any of these distractions can endanger you, your passengers, and others on the road.

There are three main types of distraction:

- Visual: taking your eyes off the road
- Manual: taking your hands off the wheel
- Cognitive: taking your mind off driving

We apply the Federal Motor Carrier Safety Administration (FMCSA) rule for Commercial Motor Vehicle (CMV) Drivers to all groups of Authorized Drivers. The rule restricts drivers from reaching for or holding a mobile phone to communicate, as well as dialing by pressing more than a single button.

In short, unsafely reaching for a device, holding a phone, or pressing multiple buttons is prohibited.

- ### High Risk Driving Behaviors

High risk driving behaviors include but are not limited to:

- DUI – Alcohol or Drugs
- Speeding 20 MPH or more
- Operating while intoxicated
- Felony use of a vehicle
- Excessive use of horn
- Yelling or making obscene gestures
- Tailgating
- Running Red lights and stop signs
- Weaving in traffic
- Passing school bus with lights flashing for loading or unloading
- Crossing RR tracks against warnings
- Drag racing
- Racing
- Other aggressive behaviors

Drivers should receive information or refresher training on an annual basis regarding the impact of risky and aggressive driving.

- ### Speed Control

Drivers should receive initial training and follow-up information or refresher training on an annual basis to ensure that vehicles are operated within speed limits and at speeds safe for ambient conditions.

Fleet Safety Committees shall assess the need to implement In-vehicle GPS monitoring systems for speed control. Centrally monitored system can record data in real time when a driver exceeds the speed limit, accelerates quickly, and instances of hard breaking for alerts and/or later performance analysis.

- ### Journey Management

[reserved]

- ### Fatigue Management

[reserved]

- ### Operational Policies

[reserved]

- ### *Business Use*

All Authorized Drivers will be held accountable to meet our standards for Driver Expectations, Cellular Phones and Electronic Device Usage in **Attachment 4**.

- *Personal Use*

Company Vehicles are provided for business use. Personal use is an "assigned" privilege. The privilege will be revoked when a driver's behavior does not comply with our standards for Driver Expectations, Cellular Phones and Electronic Device Usage in **Attachment 4**.

Personal use of "assigned" Company Vehicles is a taxable employee benefit.

Car Mileage listing total mileage and total personal use mileage, must be reported annually to the Payroll Administrator no later than October 15th. Failure to do this can result in suspension of your use of the Company Vehicle. An email will be sent as a reminder. See **Attachment 7**.

Prohibited personal use of Company Vehicles includes: Hauling anything in tow including, but not limited to, a trailer, boat, U-Haul, camper, or any type of "off-roading." Guns (including, but not limited to, handguns, shot guns, rifles, pistols or any type of firearm) are not permitted to be stored or transported in Company Vehicles.

Employees involved in accidents while using a Company Vehicle for any prohibited uses may be required to bear the cost of any personal damages that might arise because of their actions in these situations.

The Company reserves its right to take away a Company Vehicle, restrict an employee's personal use privileges, or require an employee to purchase personal auto insurance covering their use of the Company Vehicle if the employee fails to maintain an acceptable driving record.

- *Driver Owned/Leased Vehicles Used for Business Purposes*
- There are occasional situations where drivers use their personal vehicles for company business. The use of a personal vehicle for business purposes must be approved by your supervisor. In these cases, drivers will be reimbursed on a per-mile basis or prearranged vehicle allowance.
- The company reserves the right to withdraw this privilege at any time. See **Attachment 8** for Minimum Insurance Limits for Personal Vehicles.

- *Rental Car Policy*

Permission to rent and/or operate a rental vehicle for a business purpose is restricted to Authorized Drivers using a purchase card in their name that was provided by company.

Drivers should decline the insurance provided by the rental company whenever possible because the company auto insurance policy provides liability coverage and coverage provided by the purchase card covers repairing or replacing the rental car up to the actual cash value of the car (maximum $50,000) at the time of the loss.

All aspects of this policy apply during rentals.

5.0 DRIVER

- Job Description

Job Descriptions must specify if driving is required, and the type of driver's license required.

Authorized Driver categories include…

1. ***DOT Regulated CDL Driver***
2. ***DOT Regulated Non-CDL Driver***

3. ***Non-Regulated Driver-Monitored***
4. ***Non-Regulated Driver***

Employees who are not ***Authorized Drivers*** may not operate a motor vehicle for busines purposes.

6.0 VEHICLE

- ### Vehicle Acquisition & Vehicle Review Committee

The Vehicle Review Committee is comprised of the VP of Asset Management, VP of HR, and the President. The Vehicle Review Committee is responsible for approval of the level of management, vehicle type, and options for Company Vehicles.

- ### Vehicle Ordering Process

All vehicles approved for purchase will be reviewed by the VP of Asset Management of Colas Inc. and ordered by the Asset Manager that is located at the Employee's location. All vehicles will be ordered from our Fleet Company.

If there is a circumstance where a vehicle must be acquired sooner through a dealership, approval from the Vehicle Review Committee is required.

- ### Vehicle Replacement

All company vehicles will be replaced within the calendar year when the vehicle becomes 5 years old or 150K miles, whichever comes first. Decisions on vehicle replacement will be reviewed by the Vehicle Review Committee and validated by the Employee's supervisor.

- ### Surplus Vehicles

If there is a Surplus vehicle available because an employee leaves the company for whatever reason, the surplus vehicle may be assigned to an employee to use as their Company Vehicle. If this occurs, the Vehicle Review Committee will review and approve this.

- ### *Modifications*

All vehicle modifications must be authorized by Equipment Managers before they are completed.

- ### *Emergency Equipment*

Vehicles shall be equipped with appropriate emergency equipment.

Items to be included will be determined by local Safety Managers, example items include:

- First-aid kit
- Flashlight
- Reflective safety vest
- Light sticks fire extinguisher
- Tire inflator/sealant
- Reflective triangles/flares

- *Vehicle Inspections*

Drivers of personally assigned company vehicles are expected to:

- Inspect the vehicle for safety on a regular basis
- Keep tires inflated and windows clean inside and out
- Be responsible for damage to company vehicles resulting from reckless or abusive operation.

Drivers of pool vehicles must follow requirements established by local Equipment Managers.

- *Pre-Operational Vehicle Checks*

DOT-Regulated CMV drivers are responsible for daily vehicle inspections and reporting.

- *Vehicle Maintenance*

Equipment Mangers are responsible for systems ensuring that pool vehicles are monitored, and maintenance is completed per the manufacturer's instructions.

- *Scheduled Maintenance*

Drivers of personally assigned company vehicles are expected to schedule and complete routine maintenance per the manufacturer's instructions.

7.0 INCIDENT REPORTING AND ANALYSIS

A Vehicle Accident Kit and completed I.C.E. Card should be kept in your vehicle (**Attachment 6**).

Instructions at the Scene of Accident

1. Stop immediately. Pull to a safe location. Notify the police.
2. Determine if there are any injuries and call for help.
3. Take pictures of the accident scene.
4. Exchange information with the other driver(s) and witnesses (use attached cards).
5. Do not make a statement of any kind or discuss the accident with anyone other than the police officer or your employer.

Notify your manager and designated HR/Safety Staff as soon as you have taken care of your obligations at the accident scene (before leaving the scene if possible).

Electronic notification (email or text) is acceptable for minor accidents involving property damage only. Return the completed form and information cards to your manager or the designated person for your business unit within 24-hours. Additional investigation and/or paperwork may be required.

Notify Human Resources if you are injured while driving a company vehicle accident or a personal vehicle for a business purpose.

Failing to stop after an accident and/or failure to report an accident may result in disciplinary action, up to and including termination of employment