



Reinforced Concrete Construction

KAHNCO, LLC

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SAFETY PROGRAM

Company Safety Policy

KAHNCO, LLC is committed to providing a safe and healthful workplace for its employees. The company strongly encourages open communication and collaboration to provide the safest working conditions for all personnel involved in work activities. Safety first – always

Safety Program Goal

It is the goal of KAHNCO, LLC to maintain a comprehensive safety and health program to ensure the safety of all employees and fellow workers.

Safety and health shall be a primary consideration in the design, procurement, installation, use, and maintenance of all company facilities, equipment, tools, supplies, materials, processes, and operations. The company will comply with all applicable federal, state, and local laws pertaining to occupational safety and health. It is the intent of this written program to outline the responsibilities of KAHNCO, LLC management, supervisors and employees.

As a condition of employment, all personnel are required to comply with company safety regulations and to act in a safe manner while on the job. Employees are to report accidents, injuries, unsafe acts or unsafe conditions to their supervisor immediately.

Management Responsibility

It is the responsibility of management to:

1. Ensure the supervisors and employees are properly trained in required safety skills.
2. Support supervisors through providing safety material and topics to be used at weekly safety meetings.
3. Provide the resources necessary to maintain and implement safety into the company.
4. Provide access to personal protective equipment (PPE) for all employees and enforce the use of

5. the equipment as needed.
6. Provide the proper tools and safety equipment needed to perform the job safely.
7. Ensure that all accidents and near-miss incidents are investigated promptly and that corrective action is taken to correct any unsafe acts or condition(s).

Supervisor Responsibility

It is the responsibility of the supervisor to:

1. Enforce all safety and health rules and policies and take corrective action, including discipline, as needed.
2. Conduct daily jobsite inspections for safety hazards and safety violations, and take corrective action as needed.
3. Maintain a safe worksite through appropriate and immediate attention to unsafe acts, unsafe working conditions, and poor housekeeping.
4. Investigate all reported near misses, accidents and unsafe acts in a timely manner and take appropriate corrective action.
5. Assist management in the safety orientation and training of new employees on the recognition of unsafe conditions and ensure that all employees understand the contents of the written safety program.
6. Conduct weekly safety meetings to provide continuous training and awareness of safety.
7. Enforce the use of all personal protective equipment.
8. Inform management, in a timely manner, of the need for safety equipment and PPE.
9. Follow-up on reported and/or observed unsafe conditions or safety violations to ensure corrective action.

Employee Responsibility

It is the responsibility of the employee to:

1. Follow all safety rules, policies and procedures as stated in the written safety program.
2. Report all unsafe acts and conditions to the supervisor immediately.
3. Utilize all personal protective equipment necessary for duties.
4. Conduct daily inspections of tools and materials for defect and remove and report unsafe tools.

5. Report accidents and near misses immediately to supervisor.
6. Attend and participate in safety meetings.
7. Provide insight and ideas regarding safety to management.
8. When using prescription medication during working hours, the employee must provide the supervisor with a letter from his/her physician verifying the type of medication, and that it will in no way impair the employee's ability to perform all the tasks associated with his/her job.

Training and Orientation

1. New employees will participate in an orientation meeting in which the company's safety policy and procedures will be reviewed. The Employee will read and sign the Jobsite Safety Orientation Handout, and retain the "IN CASE OF INJURY" page.
2. Employees will be trained on the recognition of potential hazards and safety regulations regarding the jobs they will perform. This orientation will occur before any work is performed. All personal protective equipment will be disbursed at this time and instruction on the proper use and storage of the equipment will be covered.
3. All employees will be made aware of the location of first-aid supplies, and the names of employees trained to render first-aid treatment and CPR.

Worksite Hazard Analysis

1. A pre-construction inspection will be conducted, prior to any job, by management or the supervisor to determine potential safety hazards.
2. A pre-construction safety meeting will be conducted, prior to any job, to discuss any safety hazards that may be encountered. Employees attending the meeting will be asked to provide insight of any potential hazards that may arise regarding the operations.
3. The supervisor will conduct job site walk-through inspections daily. All hazards and unsafe conditions observed will be corrected immediately.

Accident/Incident Reporting and Investigation

Purpose

These procedures prescribe methods and practices for reporting and investigating accidents and incidents at all worksites of the company. These procedures provide a means to deal with job site accidents and incidents in a standardized way. In addition, it is the policy of KAHNCO, LLC to comply with all worker's compensation laws and regulations.

Procedures

Report ALL injuries and unsafe activities immediately to your Kahn Company Foreman who will immediately report to the Safety Administrator and onsite General Contractor.

1. Follow General Contractors Emergency Procedures, which includes and contacting Kahn Company Safety Administrator.
2. Assemble at designated location safe from danger, outside of the work areas, leaving personal belongings and tools behind.
3. Account for every Kahn Company employee on site and communicate to General Contractor if anyone is unaccounted for.
4. DO NOT PROVIDE ANY INFORMATION OR MAKE ANY COMMENTS TO ANY MEDIA SOURCE OR NON-EMERGENCY PERSONNEL. Refer all comments to the Kahn Company Administration.

IN CASE OF INJURY Follow Kahn Company procedures.

1. Always know the location of your first aid kits:
 - Kahn work trailer
 - Foreman's vehicle
 - General Contractor's work trailer
2. When injury occurs, notify the following people:
 - The ON SITE General Contractor
 - Your ON SITE Kahn Co. Foreman
 - Becky Whiting (540-487-2406)-Kahn Co. Safety Administrator.

➤ Forman and Safety Admin will quickly decide the severity of the situation and determine together the next action.
3. Taking Action and Assessing the injury:
 - a) Is there loss of blood that cannot be controlled?
 - Call 911
 - Apply first aid accordingly
 - Wait for paramedics
 - b) Is there unconsciousness or difficulty breathing?
 - Call 911
 - Apply first aid accordingly
 - Wait for paramedics

4. If the injury is not extremely serious, yet still may require stitches or an x-ray:
 - a) Apply first aid and make sure Kahn Safety Administrator is on the way to transport injured to the nearest MedExpress, **OR** If the drive is far, proceed to the nearest MedExpress, calling Kahn Company Safety Administrator to meet you there with the injured party.
5. An employee witnessing an accident/incident at a job site shall call for emergency help or provide whatever assistance appears necessary. In addition, the employee is to take part in answering questions related to the accident.

First Aid

A first aid kit will be in all company trucks or trailers. The kit will be replenished as needed and inspected monthly.

Substance Abuse Policy

1. Substances covered by this policy include alcoholic beverages, legal or illegal & illicit drugs, including marijuana, mood- or mind-altering substances, “look-alike” substances, designer and synthetic drugs, certain inhalants, prescription drugs and over the counter medications (except as hereinafter noted) are prohibited.
2. Employees covered by this policy may maintain on premises prescription drugs and over the counter medications provided that: a doctor has prescribed the drugs for the person in possession of the drugs; the drugs are kept in their original container from the pharmacy; or a registered pharmacist filled the prescription within the last 12 months for the person in possession of the medication.
3. Employees are required to take a Drug Screen under the following circumstances and agree to do so or be subject to termination. Accident Testing: All employees involved in an accident will be asked to take a Drug Screen immediately following the accident. If immediate testing is not possible, the test must be performed within 24 hours of the accident. Such test is voluntary, but failure to take the test will result in termination.

Excavation Policy

1. Employees will not work in excavations over 4 feet in depth that are not provided with ladders, steps, ramps, or other safe means of egress located as to require no more than 25 feet apart.
2. Before starting any excavation work, make sure all required excavation permits are obtained. For work outside of industrial sites, make sure a “Miss Utility” check has been performed.
3. Excavations must be properly barricaded to prevent accidental entry by other workers or visitors.

4. In excavations which employees may be required to enter- excavated or other materials must be effectively stored or retained at least 2 feet or more from the edge of the excavation.
5. Trenches less than 4 feet in depths must be effectively protected when the condition of the ground indicate expected hazardous ground movements.

GENERAL SAFETY AND HEALTH REQUIREMENTS

General Site Safety Rules

The following general safety rules apply to all persons working on the job site. These rules must be observed at all times.

1. Report all unsafe practices, conditions, equipment, or tools to your supervisor immediately.
2. All injuries, regardless of how minor, must be reported to your supervisor immediately.
3. Familiarize yourself with your job and its hazards prior to beginning work. In the event that you are unsure of the hazard or how to continue safely, request assistance from your supervisor.
4. Firearms, illegal drugs, and alcohol are prohibited on company property, in company vehicles, and on job sites. Employees are not permitted to work under the influence of drugs or alcohol.
5. All persons working at or above six feet will follow the 100% fall protection program.
6. Fighting, horseplay, scuffling, running, and other inappropriate conduct in the workplace are prohibited.
7. Roped-off, barricaded areas identified as safety hazards may be entered only by authorization of the supervisor responsible for the work.
8. All chemical containers must be labeled to correctly identify its contents and must be properly stored.
9. All personal protective equipment will be used as required and maintained in a sanitary condition.
10. All machine guards and safety devices must be in place before operating tools and machinery.
11. Tools and equipment must be kept clean and in good working condition. They will be maintained and used according to manufacturer's recommendations. Tools and equipment will be inspected daily and defective tools and equipment will be taken out of service and tagged "Do Not Use."
12. Always use the right tool for the job. Improvising to save time may prove to be hazardous.
13. Only persons with adequate training and/or experience are permitted to operate equipment.
14. Store all materials, tools, and equipment neatly and appropriately.

15. Do not enter confined space (limited access) unless properly trained and authorized to do so by your supervisor through a properly completed written Confined Space Entry Permit.
16. Employees are not to ride as passengers on construction equipment nor are they to ride in the bed of pickups.
17. Daily housekeeping is required and job sites will be maintained in a neat and orderly manner.
18. Always dress properly and wear clothing that fits properly and is in good condition. Shirts at least short sleeves, long pants and good work shoes with slip resistance soles are the minimum requirements.
19. Jewelry, especially rings and dangling necklaces, can cause serious injury if it gets caught in rotating equipment, on nails or screws, ladder rungs, scaffolding or various type of building materials, therefore, rings and dangling jewelry must be removed prior to working where they can get caught. This applies especially when working at elevations.
20. Protect your back. Exercise care in lifting and moving material. Ask for help in moving heavy, bulky, or unusually long materials.
21. Portable ladders in use must be in good condition and tied, blocked or otherwise secured to prevent them from movement.
22. Metal ladders must not be used for electrical work or where they may come in contact with electrical conductors.
23. All employees exposed to falling 6 feet or more from an unprotected side or edge shall select a guardrail system, a safety net system or a personal fall arrest system to prevent falls to a lower level, unless otherwise provided for in OSHA regulations that apply to residential construction, and steel erection.
24. Scaffolds must have guardrails and toe boards installed on all open sides & ends of platforms more than 10 feet above the ground or floor.
25. Drivers of company vehicles must have a valid operator's license. All employees will use seat/shoulder belts when operating or riding in a vehicle being used for company business. Vehicles must be operated within posted speed limits & applicable state vehicle laws.

Vehicle Safety

Only authorized and trained personnel are to operate motor vehicles. It is the responsibility of all vehicle operators to wear their seatbelt, drive according to the law, and maintain a valid operator license. Speed limits are to be followed and when necessary, speed shall be reduced to prevent an accident. The company may request a copy of any employee's driving record prior to allowing an employee to operate company vehicles.

Vehicle operation

1. Always check the load for stability and security.
2. All equipment and supplies shall be stored properly.
3. Reduce speed in adverse weather.
4. If you are involved in an accident, contact the office immediately.
5. If stopped by an official, report to the office immediately, regardless of infraction or not.
6. Utilize the 3-5 second rule. Pick a spot ahead of the car ahead of you. When that car passes that point, begin counting, if you cross the point before 3-5 seconds, slow down.
7. No more than three people may ride in the front of a pick-up.

Vehicle Maintenance

An overall vehicle inspection shall be done daily. Check:

1. All fluids: oil, transmission fluid, washer fluid, fuel;
2. Tires, wipers, windshields and lights;
3. Horns and back up alarms;
4. Brakes and steering;
5. Windows and rear-view mirrors.

Report any defective or missing equipment to your supervisor.

DO NOT OPERATE VEHICLE UNTIL REPAIRS ARE MADE IF IT IS CONSIDERED UNSAFE.

Housekeeping and Sanitation

1. All debris, including scrap lumber with protruding nails, must be cleared from work areas, passageways, and stairs in and around the construction site at all times.
2. Combustible scrap and debris must be removed at regular intervals and disposed of properly.
3. All work areas are to be cleared at the end of each workday.
4. Oily, flammable, or hazardous waste or debris such as paints, thinners, oily rags, etc. will be disposed of in clearly marked containers and disposed of daily.

5. Garbage shall be placed in container marked "garbage only" and disposed of daily.
6. Coolers, marked "drinking water," will be made available throughout the worksite and single service cups will be provided. A trash receptacle will be provided at each water station.

Fire Protection and Prevention

Fire Extinguishers

1. Tampering with, or unauthorized use of fire extinguishers is strictly prohibited.
2. Portable fire extinguishers of proper size and rating will be located in each job site trailer, equipment storage room, company vehicle, and operational equipment.
3. Fire extinguishers will be inspected monthly and maintained in accordance with NFPA Standards.

Handling Flammable or Combustible Liquids

1. Flammable liquids must be kept in an approved closed container when not actually in use.
2. Only approved metal, closed containers can be used for the storage of flammable liquids. (Plastic containers are not allowed)
3. Containers of flammable or combustible liquids must be properly labeled to show both the name of the liquid and the hazard in accordance with the Hazard Communication Program.
4. No more than 25 gallons of a flammable or combustible liquid may be stored in a work or construction area outside of a flammable liquid storage cabinet or room.
5. Flammable liquids may be used only where there are no open flames or other sources of ignition within 50 feet of the operation, unless conditions warrant greater clearance.

Stairways

1. On all structures, two or more floors (20 feet or over) in height, stairways, ladders or ramps must be provided for employees during the construction period.
2. All parts of stairways must be free of hazardous projections, such as nails.
3. Debris and other loose material must not be allowed on or under stairways.
4. Slippery conditions on stairs must be eliminated as soon as possible after they occur.
5. Temporary stairs must have a landing not less than 30 inches in the direction of travel at every 12 feet of vertical rise.

6. Rise height and tread width must be uniform throughout any flight of stairs.
7. Every flight of stairs having four or more risers must be equipped with standard stair railings or Standard handrails along each unprotected side or edge. A standard railing consists of top rail, and an intermediate rail, toe board, posts or screen, and is at vertical height of not less than 36 inches. A standard handrail is similar, but is mounted on a wall or partition and does not include an intermediate rail. It has a height of 30-37 inches above the forward edge of the tread.

Floor and Wall Openings (Fall Prevention)

1. A floor hole is defined as an opening measuring 2 inches or more in its least diameter in any floor, roof, or walking/working surface.
 - a) On construction sites, floor holes, including skylights, where there is danger of fallings through must be guarded on all exposed sides by a standard guardrail, or closed over with a cover that is secured against accidental displacement.
 - b) On construction sites, all covers in walking/working surfaces or roofs shall be color-coded or shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.
2. A wall opening means a gap or void 30 inches or more high and 18 inches or more wide, in a wall or partition, through which employees can fall to a lower level.
 - a) On construction sites, each employee working on, at, above, or near wall openings (Including those with chutes attached) where the outside bottom edge of the wall opening is 6 feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface, shall be protected from falling by the use of a guardrail system, a safety net system, or a personal fall arrest system.
3. A standard guardrail, or the equivalent, except where there is an entrance to a ramp, stairway, or fixed ladder, must guard every open sided floor or platform 4 feet or more above the adjacent floor or ground level.
4. The railing must have a 4-inch toe board whenever persons can pass beneath the open sides, or there is moving machinery with which falling material could create a hazard.
5. Runways must be guarded by a standard top rail and mid-rail on all open sides 4 feet or more above the floor or ground. Wherever tools, machine parts, or materials are likely to be used on the runway, a 4-inch toe board must be provided.

Tools-Hand and Powered

Hand Tools

1. Wrenches, including adjustable, pipe-end and socket wrenches must not be used when jaws are sprung to the point that slippage occurs.
2. All tools, company issued and personal, must be inspected daily for splinters, cracks and loose joints.

3. Any tools with defects must be removed from the work site and tagged "DO NOT USE."
4. Always use the proper tool for the job.

Power Tools

1. Power tools are designed to accommodate guards; they must be equipped with such guards when in use. Belts, gears, shafts, pulleys, sprockets, drums, fly wheels, chains or other reciprocating, rotating or moving parts of equipment must be guarded.
2. All manufacturer's warnings and safe operating procedures for tools will be followed.
3. The use of electrical cords for hoisting and/or lowering tools is not permitted.
4. Electric power tools must be industrial or heavy-duty grade, with approved double insulated wiring or grounded.
5. All portable, power-driven circular saws must be equipped with guards above and below the base plate or shoe.
 - a) The upper guard must cover the saw to the depth of the teeth, except for the minimum arc required to permit the base to be tilted for level cuts. The lower guard must cover the saw to the depth of the teeth, except for the minimum arc required to allow proper retraction and contact with the work.
 - b) When the tool is withdrawn from the work, the lower guard must automatically and instantly return to the covering position.
6. All pneumatically driven nailers, staplers, and other similar equipment provide with automatic fastener feed, which operate at more than 100 psi, must have a safety device on the muzzle to prevent the tool from ejecting fasteners unless the muzzle is in contact with the work surface.
7. Compressed air must not be used for cleaning purposes.
8. All compressed air hoses exceeding ½ inch diameter must have a safety device at the source of supply to reduce pressure in case of hose failure.

Material Handling

Storage

1. Storage areas must be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage. Vegetation control will be exercised when necessary.
2. All materials stored in tires must be stacked, racked, blocked interlocked, or otherwise secured to prevent sliding, falling or collapse.

3. Aisles and passageways must be kept clear to provide for the free and safe movement of material handling equipment or employees. Such areas must be kept in good repair.
4. Materials must not be stored on scaffolds or runways in excess of supplies needed for immediate operations.
5. Lumber:
 - a) Used lumber must have all nails withdrawn before stacking.
 - b) Lumber must be stacked on level and solidly supported sills.
 - c) Lumber must be stacked so that it is stable and self-supporting.

Personal Protective Equipment Program

PPE Program Policy

Employees using hand and power tools and those who are exposed to falling, flying, abrasive, splashing objects, dusts, fumes, mists, vapors, or gases will be provided with the particular protective equipment and associated training necessary by General Manager to protect them from the hazard.

Personal protective equipment must be used and maintained in a sanitary condition at all times. Employees are to follow the guidelines provided on use and care of all personal protective equipment. Improper use and care of PPE will not be tolerated. Employees who violate this rule will be subject to disciplinary action up to and including discharge.

All employees will be instructed on the proper use, care, and maintenance of personal protective equipment prior to use.

All new employees will be issued a hard hat and safety glasses prior to beginning work. Employees are required to provide their own safe work boots. Special equipment and needs, such as: face shields, respirators, dust masks, hearing protection, and gloves, may be issued on an as need basis.

Head Protection

Issued, ANSI approved, hard hats are required at all times.

All hard hats are to be worn correctly. Persons wearing hats under their hard hat and/or wearing them backward will be cited for a safety violation.

Hard hats will be inspected daily for infractions and weaknesses. Hard hats in unsatisfactory condition will be disposed of.

Eye and Face Protection

Approved safety glasses are required at all times.

Face and eye protection equipment shall be kept clean and in good repair.

Hearing Protection

Hearing protection devices will be worn during operations that require use of pneumatic tools, jackhammers and any other noise producing tools. In the case of question, contact your supervisor.

Hearing protection devices may include earplugs or earmuffs. Plain cotton is not an acceptable protective device.

Body and Clothing Requirements

Long pants will be worn at all times. Shirts with sleeves (no tank tops) are required. Excessive jewelry and loose clothing are not allowed.

Hand Protection

While utilizing tools and handling materials that could cause injury to the hand, appropriate gloves are required to be worn.

Leather gloves shall be worn when working with sharp or abrasive material.

Rubber gloves shall be worn when working with solvents and/or chemicals.

Fall Protection Policy

Policy

KAHNCO, LLC requires 100% continuous fall protection for all employees. All employees will be trained on the recognition of fall hazards and measures prior to beginning work. All fall arrest systems will be provided by the company.

All jobs and duties shall be assessed for fall hazards and appropriate measures shall be made to prevent falls prior to beginning any duties.

Ladders

1. All ladders must be maintained in good repair. Ladders with broken or missing rungs or steps, broken or split side rails, or other faulty or defective construction must not be used. Any ladder with a defect must be removed from the worksite and tagged "Do Not Use."
2. Portable ladder feet must be placed on a firm, substantial base.
3. The area around the top and bottom of the ladder must be kept clear of debris, cords, welding leads, and other tripping hazards.
4. Portable ladders shall be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is about one-quarter of the working length of the ladder.

5. Ladders are not to be used in a horizontal position as platforms, walkboards, runways, or scaffolds.
6. Ladders must not be placed in passageways, doorways, driveways, or any location where they may be displaced by activities conducted on any other work, unless protected by barricades or guards.
7. Ladder rails must extend at least 3 feet above the upper landing surface to which the ladder is used to gain access. If it is necessary to extend the ladder less than 3 feet, the ladder shall be secured at the top to a rigid support that will not deflect and grab rails, which provide a secure grip for an employee moving to or from the point of access, must be installed.
8. Portable ladders in use must be tied, blocked or otherwise secured to prevent them from movement.
9. Portable metal ladders must not be used for electrical work, or where they may come in contact with electrical conductors.
10. Prior to ascending and descending a ladder, the employee shall ensure that the ladder is secured against displacement, and extends at least 36 inches above the landing.
11. Ladders shall not be used to support scaffold boards.
12. Hands must be free from tools and equipment when climbing on a ladder.

Scaffolding

1. All manufacturer's directions, load capacities, and height requirements shall be followed when scaffolds are used.
2. All scaffolds will be inspected before use.
3. The footing or anchorage for scaffolds must be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose brick, or concrete blocks must not be used to support scaffolds or planks.
4. A competent person must supervise all scaffolding erection, movement, dismantling, or alteration.
5. Guardrails and toe boards must be installed on all open sides and ends of platforms more than 10 feet above the ground or floor. Scaffolds 4 feet to 10 feet in height, having a minimum horizontal dimension in either direction of less than 45 inches, must have standard guardrails installed on all open sides and ends of the platform.
6. Guardrails must be 2 x 4 inches, or the equivalent, approximately 42 inches high, with a mid-rail when required. Supports must be at intervals not to exceed 8 feet. Toe boards must be a minimum of 4 inches in height.

7. Fall protection will be used in the case that guardrails cannot be properly installed.
8. Overhead protection must be provided for workers on scaffolds exposed to overhead hazards.
9. Slippery conditions on scaffolds must be eliminated as soon as possible after they occur.
10. Scaffolds and their components must be capable of supporting without failure at least 4 times the maximum intended load.
11. Any scaffold, including accessories such as braces, brackets, trusses, screw legs, ladders, etc., damaged or weakened from any cause must be immediately repaired or replaced.
12. All scaffolds and work platforms must be a minimum of 2-planks wide.
13. All planking or platforms must be overlapped, a minimum of 12 inches, or secured from movement.
14. Platform planks must be laid with their edges close together so the platform will be tight with no spaces through which tools or fragments of material can fall.
15. Employees shall not climb scaffold frames or braces.
16. All scaffolds shall be provided with properly secured access ladders.
17. Scaffold planks must extend over their end supports between 6 inches and 12 inches.
18. The poles, legs or uprights of scaffolds must be plumb, and securely and rigidly braced to prevent swaying and displacement.

Body Harnesses and Lifelines

1. A complete fall arrest system shall consist of a full body harness, a shock-absorbing lanyard with a self-locking clip, and an adequate anchorage point.
2. All parts of the fall arrest system will be inspected prior to each use to ensure that no part is damaged or deteriorated. In the case that something is damaged, it is to be removed from the worksite and tagged "Do Not Use."
3. In the case that a fall arrest system is utilized, it shall be removed from operation immediately and a new arrest system is to be issued.
4. An approved safety harness and lanyard shall be worn at all times while working 6 or more feet above any surface.
5. Fall protection will be utilized to prevent falls from ladders, lifts, elevated platforms, scaffolds, vessels, or any elevation in which there are no other means of protection from falling.
6. Lifelines and lanyards must be secured above the point of operation to an anchorage point or

structural member capable of supporting a minimum dead weight of 5,400 pounds. The anchorage must be independent of any anchorage being used to support or suspend platforms.

7. Fall arrest systems must be rigged such that any employee can neither free fall more than 4 feet or contact any lower level.
8. All body harness and lanyard hardware must be drop forged or pressed steel, or made of equivalent materials. Surfaces must be smooth and free of sharp edges and have a corrosion resistant finish.
9. All body harness and lanyard hardware, except rivets, must be capable of withstanding a tensile loading of 5,000 pounds without cracking, breaking or taking a permanent deformation.

Written Hazard Communication Program

Introduction

The OSHA Hazard Communication Standard was promulgated to ensure that all chemicals are evaluated and that information regarding the hazards would be communicated to employers and employees. The goal of the standard is to reduce the number of chemically related occupational illnesses and injuries.

In order to comply with the Hazard Communication Standard, this written program has been established by KAHNCO, LLC. All divisions and sections of the company are included within this program. Copies of this written program will be available for review by any employee.

Hazard Determination

All hazardous chemicals in this facility are purchased materials; there are no manufactured or intermediate hazardous chemicals. Therefore, the company shall rely on the hazard determination made by the chemical manufacturer as indicated on the Material Safety Data Sheet (MSDS).

Basic components of the Program Include

1. Hazardous Chemical Inventory List
2. Material Safety Data Sheets
3. Label and other forms of warning
4. Employee information and training
5. Non-routine tasks
6. Unlabeled pipes
7. Multi-employer workplaces
8. Program review

1. Hazardous Chemical Inventory List

A list of all known hazardous chemicals/products used by employees is to be maintained by the company.

2. Material Safety Data Sheets:

When chemicals are ordered, the company shall specify on the purchase order that chemicals are not to be shipped without corresponding material safety data sheets.

When MSDS information arrives it will be reviewed for completeness by the company. Should any MSDS be incomplete, a letter will be sent immediately to the manufacturer requesting the additional information.

A complete file of MSDS information for all hazardous chemicals to which employees of the company may be exposed, will be kept in labeled binders in the supervisor's premises.

MSDS for hazardous chemicals used by departments will be kept in labeled binders in the office of the respective departments. MSDS will be available for employees during each work shift. Should

MSDS be unavailable, please contact supervisor immediately.

MSDS will be reviewed annually by the company. Should there be any MSDS that has not been updated within the past year a new MSDS will be requested.

After three (3) documented requests for a MSDS have been unsuccessful, the problem will be reported to the nearest Occupational Safety and Health Office.

3. Labels and other forms of warning:

The Hazardous Communication Standard requires that manufacturers label hazardous chemicals. The label must contain the following:

- a) Chemical identity
- b) Appropriate hazard warnings
- c) Name and address of the chemical manufacturer, importer, or other responsible party

When chemicals are ordered by the company, the purchase order will indicate the need for the above stated information to be included on the labels or the order will not be accepted.

When chemicals are transferred from the manufacturer's containers to secondary containers, the supervisor will ensure that the containers are labeled with the identity of the chemicals and appropriate hazard warnings.

The entire labeling procedure will be reviewed annually by the company and changed as necessary.

4. Employee Information and Training:

Prior to starting work, employees will attend a health and safety orientation program. The company is responsible for organizing and conducting initial training.

The format for the training program will be oral and written.

The following topics will be covered:

- a) An overview of the requirement of the Hazard Communication Standard

- b) The labeling system and how to use it
- c) How to review a MSDS and where they are kept
- d) Chemicals present in the work operations
- e) Physical and health effects of hazardous chemicals

- f) Methods and observation techniques used to determine the presence or release of hazardous chemicals in the area
- g) Personal protective equipment and work practices to lessen or prevent exposure to chemicals
- h) Steps the company has taken to lessen or prevent exposure to chemicals
- i) Safety/emergency procedures to follow if exposure occurs
- j) Location and availability of the written program

Following each training session, the employee is required to sign and date the training record verifying attendance.

Additional training will be provided with the introduction of each new hazard/chemical. Records of this additional training will be maintained.

It is the responsibility of the Supervisor to ensure that all MSDS of chemicals that will be used on the job site are made available at a central location in the workplace along with the labeling system used. All sub-contractors will be informed of the availability of this information and its location by letter