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MILLER PIPELINE

AN ARTERA COMPANY

Health & Safety Program

President & COO's Statement

Dear Miller Pipeline Employee:

Our reputation and success at Miller Pipeline is built on the foundation of our four core values: Safety - First and Foremost; Quality - In Everything We Do; Commitment - To The Team; and Reputation - Built on Integrity. By living our values every day at home and work, every team member plays an essential role in maintaining a culture based on integrity, trust, transparency, professionalism, and pride in what we do.

As the leader of our company, it is my responsibility to promote and ensure every team member's safety and well-being within our workforce. It is your responsibility to work as a team to implement Miller Pipeline's Health, Safety, and Environmental Program and create a culture that safety is first and foremost in every part of the job. We expect full participation, cooperation, and support for all employees, people, environment, and property.

As part of our ONE Safety Mission, we focus on "ONE Day, ONE Goal, NO Incidents" to protect our employees and have every team member in our organization work each day without getting injured. We will reach our mission through proper training, dedication, and commitment to each other and our safety culture.

Thank you for your commitment to the team.

Dale A. Anderson

Dale A. Anderson
President & COO



AN **ARTERA** COMPANY

Health & Safety Program

PROGRAM ADMINISTRATION SECTION

Health, Safety & Environmental Goals

Purpose

To provide a clear understanding of what the company is trying to accomplish with our HSE efforts and to establish benchmarks that will help determine the overall success of these efforts.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

Safety Director

Set annual HSE goals, document them, and communicate them to all employees by the end of January each year.

Procedures

Philosophical Goals

Our immediate goal is to prevent harm to our employees, the public, and the environment. However, our ultimate goal is to become and remain the safest company within or industry. We feel that in order to accomplish these goals we must continue to evolve in our safety culture where employees are internally motivated to work safely at all times, even when nobody is around. Therefore, our safety programs are structured around the following core elements:

- Management must fully support the safety initiatives of our company.
- Employees must take complete ownership of our safety programs, their personal safety, the safety of their coworkers, the safety of the public in the communities where we work, and
- We must maintain clearly written procedures that address all known safety hazards.
- Detailed training must be provided to all employees on these written procedures.
- Jobsites must be observed for uncontrolled hazards or deviation from our procedures.
- Safe behaviors must be recognized, and unsafe behaviors must be corrected immediately.
- All incidents must be investigated, and corrective actions must be implemented in order to prevent reoccurrence.

Statistical Goals

In order to measure our progress, toward established goals and promote continuous improvement, we keep the following metrics (published on a monthly basis), and benchmark these numbers with industry:

- Recordable Incident Rate
- Restricted Workday Incident Rate
- Lost Workday Incident Rate
- Lost Workday Severity Rate
- Restricted Workday Severity Rate
- DART Incident Rate
- DART Severity Rate
- Preventable Vehicle Accident Rate
- Reportable Vehicle Accident Rate

This information is used to establish aggressive yet realistic goals for our company on an annual basis. These goals will be communicated to all employees, tied to our incentive programs, and our results will be updated and communicated to all levels of employees on a weekly and monthly basis via weekly "Safety Scoop" newsletters and monthly "Regional Incident Reports"/"Monthly Safety Reports".

Safety Responsibilities

Purpose

Clearly define the responsibilities that are expected to be carried out by each individual in order to instill accountability and make sure this Health & Safety Program is fully implemented.

Scope

This section applies to all company employees.

Definitions

President & COO: The individual who controls all company operations.

Safety Director: A full time employee who reports to upper management and leads all safety initiatives.

SQC/Regional Safety, Quality, and Compliance Coordinator: An employee who oversees the implementation of this safety program within their assigned region.

RTT/Regional Technical Trainer: An employee who develops and validates Safety, Quality, and Compliance department training initiatives.

Superintendent: An employee who oversees the performance of multiple crews.

Foreman: An employee who directly supervises all activities of a single crew.

Employee: Anyone employed by Miller Pipeline.

Subcontractor: Any company who is contracted to perform work for Miller Pipeline.

Subcontractor Safety Director: An individual employed by a subcontractor who is responsible for controlling the success of their safety efforts.

Responsibilities

Vice President of Environmental, Health, and Safety

Make the final decision to use or not use subcontractors who do not meet the minimum criteria of our Subcontractor Management Plan.

Oversee safety recognition programs and safety marketing/awareness programs.

Establish safety goals and strategic plan based on incident trends annually.

Manage the OSHA inspection and response process.

Report fatalities to OSHA within 8-hours of occurrence, and all inpatient hospitalizations, amputations and eye loss cases within 24-hours of occurrence.

Work with operations Vice Presidents on safety staffing needs in each region.

Attend incident review meetings.

Determine injury recordability and vehicle accident fault.

Make the final authoritative decision for common issues regarding employee safety and involve the President & COO when making substantial decisions.

Conduct unscheduled formal inspections of crews periodically by completing the *Safety Inspection Report* (located in the Miller Pipeline Hub) or by completing online through Safety Net.

Oversee the implementation of the Incentive Plan.

Evaluate work restrictions & line-up light-duty positions when possible.

Serve as the main point person for all activities involving OSHA, EPA, DOT, legal counsel for safety issues, insurance companies, and external safety services.

Safety Director/Safety Specialist

General Responsibilities

Annually review and modify all plans included in this Corporate Health & Safety Plan.

Send the *Subcontractor Prequalification Survey* (located in the Forms section) to subcontractors before they initially bid work for Miller Pipeline and annually thereafter.

Training & Education

Provide materials for Monthly Safety Meetings.

Hazard Identification & Control

Conduct a formal Job Hazard Analysis (JHA) whenever a new process or piece of equipment is introduced and review/modify existing JHA's when an incident, near-miss, or employee compliant occurs. New JHA's will be documented on the *Job Briefing & Hazard Assessment* form (in the Forms section).

Conduct unscheduled formal inspections of crews periodically by completing the *Safety Inspection Report* (located in the Miller Pipeline Hub) or by completing online through Safety Net.

Review subcontractor safety information to determine if they are allowed to work for the company.

Data Management

Maintain documentation of all safety related activities on file at the main office (e.g. training events, inspections, disciplinary actions, medical documentation, etc.).

Process all paperwork between Miller Pipeline, the employee and designated healthcare facility necessary to evaluate an employee for the use of a respirator, including the *Respirator Medical Questionnaire* and *Respirator Information for the Physician* forms (both located in the Forms section).

Offer the Hepatitis B vaccination to employees who could be exposed to bodily fluids and ensure the completion of the *Bloodborne Pathogens Vaccination Form* (located in the Forms section).
Conduct a comprehensive trend analysis quarterly to identify leading areas of non-compliance and leading causes of injury.

Classify all injuries and log “recordable” injuries on the *OSHA 301, 300 and 300A* forms.

EHS Compliance

Manage the following online EHS compliance sites:

- ISN
- Avetta
- Veriforce (PEC Safety)
- CCS

Complete EHS Questionnaires

Develop and submit written EHS programs for regulatory compliance

Submit EHS training and supporting documentation

Report on sustainability initiatives and submit data

Incident Management

Report lessons learned from each incident to all company employees through “Safety Alerts”

Safety Program Manager

Maintain accuracy of data in the Incident Log for vehicle incidents and injuries.

Develop quarterly trending charts for the management team.

Generate monthly utility strike damage logs.

Update quarterly Incident Repeater List.

Log, file and maintain various safety documents (i.e., newsletters, inspections, meetings, gate checks, training records).

Maintain corporate OSHA 300 Logs – Update monthly; post annually Feb 1; upload electronically March 1; complete all BLS surveys.

Generate monthly customer reports for VP Safety.

Generate monthly customer reports for Quality Manager.

Enter monthly, quarterly, and annual statistics.

Respond to miscellaneous client inquiries (training, safety communication sharing, etc.).

Coordinate response/action items with affected personnel.

Enter training records, inspections, and other supporting documentation.

Monitor “grades”/status on all sites, communicate deficiencies and pending items.

Work with Safety & Quality to update/submit individual plans, programs, exemption requests as needed.

Maintain and develop training in EWN.

Manage safety marketing campaigns in conjunction with corporate communications.

Generate weekly Safety Scoop and as needed Safety Alerts.

Review all outbound safety communications and materials published to the field.

Maintain online safety library.

SQC/Regional Safety, Quality, and Compliance Coordinator

Formally inspects each crew within their region on a regular basis.

Facilitates monthly and quarterly safety meetings in each area within their region.

Assists in conducting various safety training programs as needed.

Oversees incentive programs and formal corrective actions on a local level.

Participates in the investigation of local incidents as needed.

RTT/Regional Technical Trainer

Works closely with the Regional VP or General Manager within their assigned region on a daily basis to identify Safety, Quality, and Compliance needs.

Conducts technical training portion of new-hire orientation.

Provides subject matter expertise through experience, training, and/or knowledge, skills, and abilities to deliver each training subject based on the company's training material and requirements.

Works closely with the SQCs on a frequent basis and discusses training program effectiveness and successful completions of training.

Superintendent

The basic role of a Superintendent is to ensure all crews within their assigned area adhere to the requirements of this safety program. Some specific examples of how they will accomplish this include:

Formally inspect each crew within their area on a regular basis.

Schedule and participate in Monthly and Quarterly Safety Meetings for all employees within their region.

Participate in the investigation of incidents.

Coordinate the annual inspection of all cranes and preventative maintenance of all other equipment/machinery.

Participate in the facilitation of company safety meetings.

Oversee the timely implementation of corrective actions.
Issue a *Disciplinary Action Form* to any company employee who violates a government regulation, company policy, or generally accepted safe work practice.

Oversee the performance of subcontractors.

Foreman

Serve as the Competent Person for fall protection & excavation operations.

Facilitate Daily Planning Huddles by documenting and submitting it to the Safety Director.

Constantly monitor job sites for physical hazards or unsafe behaviors and either correct them immediately or isolate them until they can be corrected (i.e. tagging damaged equipment as “Out of Service”, not driving a vehicle until repairs are made, etc.).

Verbally report all incidents (even near-misses) to the Superintendent & Safety Director immediately.

Administer first-aid or perform CPR on employees who need immediate injury care.

Greet OSHA compliance officers upon arrival and immediately notify the Safety Director/Safety Specialist.

Employee

Follow all company safety policies, customer safety requirements, government safety regulations, and generally accepted safe work practices. (e.g. wear and maintain all required PPE, keep work areas clear of excess debris, etc.).

Avoid performing any tasks until proper training has been provided.

Refuse to engage in any activity that is unsafe if instructed to by a customer, coworker, or supervisor, and immediately notify the Safety Director/Safety Specialist of the situation. If the Safety Director/Safety Specialist is not available, then the President & COO or other manager shall be contacted prior to returning to work. Exercise Stop Work Authority when an unsafe condition, act, or imminent hazard could result in an undesirable event. (See “Stop Work Authority” for more information.)

Attend all required safety-training events.

Verbally communicate all noticed safety hazards, concerns & incidents to the Foreman immediately. If the Foreman is not available at the time, then the Superintendent or Safety Director shall be notified

Cooperate with the investigation of all incidents by being completely honest and sharing all known facts and details during the interview process.

Immediately report any injuries, vehicle accidents, property damages or near-miss incidents to the Foreman immediately and complete the proper form. These forms include the *First Report of Injury*, *Vehicle Accident Report*, and *Property Damage Report* (each located on the Miller Pipeline Hub).

Training Requirements

All levels of employees will be thoroughly educated on the contents of this program and their individual responsibilities during “Program Administration” training (see detail in the “Training & Education” plan).

General Safety Rules

Purpose

Clearly define the duties that are expected to be carried out by each individual who is employed by Miller Pipeline in order to ensure this Health & Safety Program is fully implemented.

Scope

This section applies to all company employees.

Responsibilities

President & COO

Provide the resources and support needed to implement the general safety rules listed in this plan.

Safety Director

Oversee the complete implementation of the general safety rules listed in this plan.

Superintendent / Foreman

Continuously monitor & enforce the general safety rules listed in this plan.

Employees

Follow the general safety rules listed in this plan at all times.

Procedures

Asbestos Awareness

Asbestos is a microscopic spear-shaped fiber that's used in many common materials. If inhaled or ingested it can cause lung cancer, Asbestosis, mesothelioma, and cancer of the stomach and colon.

Asbestos materials are used in the manufacture of heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet, and fire-resistant drywall. Asbestos is also present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.

Foremen shall conduct a walk-around inspection of our jobsites before work begins. During these inspections, materials that could potentially contain asbestos (other than coal tar wrap, transite siding, or materials already identified in pre-job planning) shall be looked for that our employees could potentially disturb. If any such materials are identified they will then be discussed with the owner prior to work beginning.

Signs and labels shall identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that asbestos containing material (ACM) and/or presumed asbestos containing material (PACM) will not be disturbed.

Miller Pipeline does allow trained and authorized employees to remove coal tar pipe wrap and drill through transite house siding. However, our customer will be responsible for proper disposal of

asbestos containing materials. If a task must be done that could disturb asbestos the Foreman shall contact the Safety Director and request guidance on how to proceed.

If employees identify materials that could potentially contain asbestos (other than coal tar wrap or transite siding) that were not identified during the pre-job walk, they should not try to guess the identity of the material, but rather immediately stop work and inform the Safety Director and owner.

If employees working immediately adjacent to a Class I asbestos job are exposed to asbestos due to the inadequate containment of such job, Miller Pipeline shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment. Protective measures will be taken before our employees are allowed to re-enter the area (i.e. waiting until they are finished and the area is cleaned, wearing N-99 masks, etc.).

During Safety Orientation all employees will be trained and educated on the hazards of asbestos, how to identify asbestos, and what to do if there is a potential for exposure. This training will be documented just like all other safety training. For employees who will be required to remove coal tar wrap or drill through transite siding, training will be provided by Miller Pipeline outside of this program.

Benzene Awareness

Miller Pipeline employees could perform various tasks or work in certain areas where there is a potential for Benzene exposure. Mainly this exposure could occur when disturbing or working around soil that is contaminated with gasoline.

Benzene is toxic, colorless, has an aromatic odor, is not soluble in water and is flammable.

Short term effects of overexposure to Benzene may include: irritation of eyes, nose and skin, breathlessness, irritability, euphoria, headache, dizziness, or nausea. Long term effects may result in blood disorders such as leukemia and anemia.

Foremen shall assess the likelihood of soil being contaminated before disturbing soil or allowing employees to work around an excavation. This will be done by considering the location of the excavation (i.e. is it near a gas station, land fill, or chemical plant?), and by looking for signs of contamination (e.g. pungent odor, discolored soil, oily sheen on top of ground water).

If the determination is made that the soil could be contaminated, the crew must stop work immediately, evacuate the immediate area, and contact the Safety Director followed by the customer. The notified individuals shall work together to identify what the contamination is before work can commence.

If it is decided that the soil is contaminated with gasoline (i.e. Benzene) then the crew must secure and use appropriate air monitoring equipment. Such equipment must be able to monitor the oxygen level, flammable level, and exposure levels to Benzene (a standard four-gas monitor will NOT do this). Smoking is prohibited in areas where Benzene is used or stored.

If air monitoring equipment indicates that exposure is above acceptable levels, then grounded metal ventilation shall be used continuously while work is performed. If that does not bring the exposure down to acceptable levels, then a Respiratory Protection Plan must be implemented in order for the employee to wear a full-face supplied air respirator.

Benzene liquid is highly flammable and vapors may form explosive mixtures in air. Fire extinguishers must be readily available in areas where benzene is used or stored.

Some additional precautions that must be taken when working around soil contaminated with Benzene include: covering all exposed skin & clothing (i.e. boots, gloves, sleeves, and aprons) with disposable impervious garments, wearing goggles, and using a "fire watch" who will be responsible for keeping all sources of ignition at least 50' upwind from the work area & responding to any emergency situation.

Employees should be aware of clients' contingency plans and provisions.

Bloodborne Pathogens

All Foremen, and employees required to perform CPR/First Aid and who work in sewer pipes, will be trained in Bloodborne Pathogens and will be the only individuals who will be permitted to make contact with blood or other bodily fluids. If accidental contact does occur, notify the Safety Director immediately.

Bloodborne Pathogen supplies will be placed in all first-aid kits, which will be located in all company vehicles and on jobsites. These supplies must be used whenever there is a potential exposure to blood or bodily fluids. All other Universal Precautions shall be used as well.

Spilled blood will be immediately cleaned up and decontaminated by using the bleach packet provided. All contaminated materials will be stored in the red biohazard bags that are provided. However, vomit and sewage may be flushed down the drain (toilet). Paper towels used to clean up vomit or sewage can be placed in the trash.

Foremen, and employees required to perform CPR/First Aid, or who work in sewer pipes, will be offered and encouraged to obtain a Hepatitis B vaccination at no cost.

Compressed Air & Gas

Compressed air & gas cylinders will be labeled to indicate their contents and maintained in good condition with no rust, dents, or punctures.

Cylinders shall not be handled in a way that increases that chance of dropping, puncturing, striking or otherwise damaging them (i.e. moved with an unsecured cart or rolled on the bottom edge, etc.).

Gauges must be in good condition, able to be clearly read, and never indicate that the cylinder pressure is at an excess amount.

Unused cylinders will be stored in an upright position, with the caps on, and properly secured to prevent tipping in any direction.

Oxygen and flammable gas cylinders will be placed in separate designated locations at least 20 feet away, or be separated by a fire wall that is 5 feet high and rated for at least 30 minutes.

Signs reading "NO SMOKING" will be posted in and around cylinder storage areas.

Confined Space Entry (Permit Required)

A confined space is any space that is large enough to bodily enter, has a limited or restricted way in or out, and is not designed for continuous human occupancy. Some examples of confined spaces include, but are not limited to: manholes, pipes, pits, hoppers, tanks, vessels, silos, HVAC ducts, attics, and crawl spaces.

Confined spaces can have various types of hazards in them that pose a risk to anyone who enters. Some examples of these risks include, but are not limited to: oxygen enrichment or deficiency, flammable environment, toxins, potential for engulfment or entrapment, live energized parts, rotating parts, and more.

A Competent Person shall assess each jobsite before work begins in order to identify all confined spaces and classify them as "Permit Required". They must then communicate entry plans to the controlling contractor and host employer.

All confined space employees will hold a meeting prior to initial entry in order to discuss the tasks that will be performed and to plan the entry from start to finish.

Entry Supervisors shall secure all required supplies/equipment and make sure that all confined space employees have been trained prior to mobilizing for a new job that involves confined space entry.

The first priority of the team will always be to eliminate all associated hazards. If this cannot be done, then precautions must be taken to control existing hazards. Adequate Personal Protective Equipment must be worn if hazards cannot be eliminated or controlled.

One of the employees will complete the *Confined Space Entry Permit* (located in Forms Section) and the Entry Supervisor will approve the permit by signing it before initial entry is performed. This permit shall be posted/kept near the entrance throughout entry.

The atmosphere of all confined spaces will be continuously monitored with equipment that has been bump tested daily and calibrated as recommended by the manufacturer. Periodic monitoring may be conducted if a Competent Person can demonstrate that periodic monitoring is sufficient.

The Entry Supervisor shall determine the mechanical ventilation necessary in a confined space, as well as how frequently it should be used to control hazards. In spaces that involve a high potential of exposure to toxins or flammables, mechanical ventilation should be used continuously.

A mechanical retrieval device shall be used in all confined spaces that are 5' or more in depth, and Authorized Entrants shall stay attached when possible, to avoid the potential need for man entry rescue. If this cannot be done, resulting in the potential for man entry rescue, then emergency rescue equipment must be onsite and readily available for use.

Crane Safety

A crane is a power-operated piece of equipment used in construction that is capable of lifting, lowering & horizontally moving a suspended load. Only employees who have successfully completed OSHA's testing requirements for crane operators and have been authorized by the company are permitted to operate cranes for any length of time.

Formal inspections shall be conducted daily and annually. Operators will conduct formal daily inspections by completing the *Crane Daily Inspection Report* (located in the Forms Section). A third-party crane inspector will conduct formal annual inspections by completing the *Crane Annual Inspection Report* (located in the Forms Section).

Foremen, Operators, signal persons, and all other individuals who are involved with a lift will hold an informal meeting onsite before each lift in order to discuss the details of the lift, any unique hazards, and all necessary precautions. This meeting will also include a physical walk around inspection of the work area for such issues as uneven or soft ground conditions, low overhead power lines, etc.

If more than one crane is required to perform a lift, then a formal documented "Lift Plan" shall be written. This plan must be reviewed/approved by someone who is considered to be "Competent" and "Qualified" per OSHA's Subpart CC prior to implementation, and shared with all employees prior to beginning the lift.

A qualified signal person must be used whenever part of the load and/or crane is not in full clear vision of the operator. Only one signal person can issue signals directly to the operator. This individual must be positioned within clear vision of the operator and in a well illuminated area. Only OSHA approved hand signals are permitted. All signal persons must be trained, tested & authorized by the company.

All operational aids (i.e. anti-two-block device, hoist limiting device, level indicator) must be in place and fully functional in order for a crane to be deemed safe to operate.

All employees and pedestrians must be positioned outside and away from the swing radius of the boom whenever a crane is in operation.

All crane components must stay at least 20' away from energized overhead power lines, unless the specific voltage is known. If the voltage is known, then the table located on page 7 of the *Crane Safety* policy (located in the Reference Manual) may be referenced for alternative clearances.

If contact occurs with energized parts, all employees and pedestrians shall be ordered to stay back. Someone nearby shall then be instructed to call 911. The Operator may lower or move the equipment away from the line if their hands are already on the controls. If not, they should stay still until the lines can be de-energized. If a fire or other life-threatening event occurs, the Operator may jump from the cab but should not remain in contact with the machine, land on both feet, and hop away.

The Operator's Manual and a copy of the Load Chart must be kept on the equipment and the Operator must know where they are at all times.

Directional Boring

Directional boring, also referred to as horizontal directional drilling (HDD), is a minimal impact trenchless method of installing underground utilities such as pipe, conduit, or cables in a relatively shallow arc or radius along a prescribed underground path using a surface-launched drilling rig. The technique is routinely used when conventional trenching or excavating is not practical or when minimal surface disturbance is required.

Employees should always stay clear of the rotating drill and shaft when directional boring is being conducted. Never allow workers to stand on or straddle the drill string. Employees should not stand in the receiving pit or area where the drill is expected to exit. Other hazards include the possibility of being electrocuted if a power line is hit.

Electrical Safety

Miller Pipeline does not allow employees to work on live energized parts. If work on live parts must be performed, it can only be performed by "Qualified Electrical Workers" who have been authorized by the company.

If anyone other than a Qualified Electrical Worker crosses the Limited Approach Boundary, they must be accompanied by a Qualified Electrical Worker the entire time.

When an unqualified person is working in an elevated position near overhead lines, the location shall be such that the person and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following distances:

- For voltages to ground 50kV or below - 10 feet (305 cm);
- For voltages to ground over 50kV - 10 feet (305 cm) plus 4 inches (10 cm) for every 10kV over 50kV.

Extension cords will be equipped with a grounding pin, kept out of water, and not have any of the outer insulation damaged. Any cords with exposed wires will be removed immediately. Flat cords will not be used on job sites.

Ground Fault Circuit Interrupters (GFCI) will be used on every outlet, including generator outlets.

Wiring will be connected in a way to eliminate any possible defects (e.g. open hot, open ground, reverse polarity, etc.).

Emergency Actions

An Emergency Action Map will be developed and posted in all office and shop areas that have ten (10) or more employees. These maps will show the area/building layout, exits, mustering zones, severe weather shelter areas, and other pertinent emergency information.

The President & COO is the only individual who is authorized to communicate with the media regarding company operations or incidents. No other employees should make comments or statements.

Ergonomics (Sprains & Strains)

All necessary precautions shall be taken to minimize risk before manual lifting. This may include clearing the walkway, securing lifting equipment, and possibly getting someone to help.

Lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists should be used whenever possible. If lifting equipment is not available and the object is heavier than fifty (50) pounds, then team or buddy lifting must be used. For objects that cannot be safely team lifted, employees should seek assistance before lifting.

All employees will be educated on how to use proper lifting techniques and will be expected to practice them whenever manually lifting any object (even those under 50 pounds).

All Safety and Management personnel will monitor lifting techniques and other ergonomic risk factors whenever onsite, especially when performing safety inspections.

All new equipment and procedures will be evaluated for ergonomic risk factors when a formal Job Hazard Analysis is conducted, as required by the Hazard Analysis Plan.

All injuries, including soft tissue injuries will be investigated to determine the root cause and implement any changes necessary to prevent recurrence.

Our employees will be trained and educated on the general principles of ergonomics, recognition of ergonomic hazards, symptoms of soft tissue injuries, early symptom reporting procedures, and how to report hazards.

Extreme Temperatures

Some basic ways that employees can avoid heat stress include: dressing in light colored clothing; applying sunscreen to all exposed skin; consuming 8-ounces of water or sports drink every 30-minutes; avoiding caffeinated drinks and/or alcoholic beverages 24-hours before working in extreme heat; take physical work factors that can contribute to heat related illnesses into consideration before performing a task; taking short breaks in the shade as needed; and utilizing job rotation with coworkers when performing strenuous tasks in hot environments.

Some basic ways that employees can avoid cold stress include: dressing in warm layers; taking a change of clothing to work; wearing waterproof clothing/boots when necessary to prevent skin from getting wet; drying skin whenever it does get wet; taking frequent breaks in cold areas; drink plenty of fluids (avoid alcohol or caffeinated beverages); eat warm high-calorie food; and try to avoid fatigue.

Fall Protection

There are six approved types of fall protection, which are: guardrail systems, safety nets, personal fall arrest systems, controlled access zones, covers, and safety monitors. Miller Pipeline typically uses guardrails and personal fall arrest systems. One of these forms shall be used whenever an employee is required to work at elevations above 6'.

Some excavation edges on jobsites may not be visible. In these instances, the excavation edge should be protected by fences or barricades when excavation is 6 feet or greater in depth. In addition, walls, pits, shafts, and similar excavations six feet in depth or more will be guarded to prevent anyone falling into them by fences, barricades or covers

When using a personal fall arrest system, Foremen must make sure that anchor points are substantial enough to support 5,000 pounds per attached worker. They shall also make sure that lanyards and full body harnesses are inspected daily and free from damage. Employees who wear full body harnesses shall adjust them so that they fit snug but still allow for a full range of motion.

Fire Prevention/Protection

Flammable liquids will not be used within 20 feet of areas where sources of ignition are likely to be present unless taking proper precautions and having a designated fire watch.

Highly visible signs reading "No Smoking or Open Flame" will be posted on aboveground tanks, barrels and in all flammable storage locations. Smoking is not permitted within 50 feet of pits, excavations, or street openings. Never smoke on customer's premises.

Drums will be properly grounded, and containers will be bonded to the drum when transferring flammable liquids into portable containers.

Flammable liquids will be kept in closed containers when not actually in use. All leakage or spillage will be disposed of promptly and safely.

All flammable liquid containers will be maintained in orderly piles when stored outdoors. These piles will remain at least 20 feet from highly traveled passageways, roads, building structures and work areas that involve any type of source of ignition.

Type 2A fire extinguishers will be located no more than 3,000 square feet apart (not to exceed a travel distance of 100') and on every floor adjacent to stairwells. Fire extinguishers will remain fully charged, unobstructed and in good operating condition when not in use.

First-Aid/CPR/AED

All employees will be trained and authorized to administer first-aid, CPR and AED to employees who need immediate care.

The content of first-aid kits will be customized to include supplies that will allow Foremen to treat the common types of injuries our employees typically have. These kits will be available at every job site, at our facilities, placed in all company vehicles, and maintained fully stocked.

Eye wash stations that are capable of providing 15-minutes of continuous flow will be placed in each area where employees may be exposed to corrosive materials (e.g. battery charging stations). These eye wash facilities must be located within 50' from corrosive handling areas.

A designated person will inspect the AEDs at our facilities monthly as part of their maintenance plan. Items inspected include AED battery charge and expiration date, pads expiration date, supplies, etc.

Fleet Safety

Each employee who operates a company vehicle shall conduct a thorough inspection of their vehicle each day before they operate it.

Employees shall follow all motor vehicle laws and exercise extreme caution whenever operating a company vehicle (e.g. secure loads, wear seatbelt, obey speed limit, use turn signals, maintain adequate following distance, obey traffic devices, etc.). They should also maintain professional courtesy and good housekeeping at all times.

Operating mobile electronic devices (e.g. computers, music players, gaming devices, etc.) is strictly prohibited while operating a company vehicle. Using cell phones while operating a company vehicle is strongly discouraged, unless using a hands-free device with one button push operation. If a hands-free device is not used, then the vehicle should be pulled over and remain in a safe location until the

driver is finished. Reading, writing or responding to text messages or emails while operating a motor vehicle is prohibited. Employees must follow all state and local regulations.

If a motor vehicle accident occurs our employees shall move the vehicle to a safe location, call 911, report the incident to the Superintendent, take pictures, and complete the Vehicle Incident Report.

Forklift Operations

Employees are not permitted to operate forklifts for any amount of time unless they have been trained and authorized by the company.

Operators must conduct a thorough inspection of all forklifts before each day of use by completing the *Lift Truck Daily Check Sheet* (located in the Forms section). If any defects are found, a warning tag shall be placed on the unit indicating that it is "Out of Service" until proper repairs are made.

Operators shall wear seatbelts whenever forklifts are equipped with them, operate the unit so they can maintain clear vision of the work area and pedestrians around them, drive at slow and controlled speeds, sound the horn at intersections and corners, and never exceed the maximum rated load capacity indicated on the manufacturer's identification plate.

Personnel will not be elevated using forklifts, unless the forklift is designed by the manufacturer to do so. Proper means of fall protection will be used when an employee is elevated.

When a forklift is left unattended, the load engaging means will be fully lowered, controls neutralized, the power off, and brake set. If parked on an incline, the wheels will be blocked.

General Safety

Never act in an unsafe manner or violate company policy. Violation of company policy will result in disciplinary action.

The use of cell phones, computers, portable music players, and other electronic devices shall be avoided whenever performing a critical task that could result in injury if focus is not maintained.

Reporting to work while under the influence of alcohol or drugs, or bringing weapons of any kind onto company property is strictly prohibited. Miller Pipeline reserves the right to search personal property if there is suspicion of either one of these policies being violated.

Limit the use of smoking and tobacco products to designated areas that are approved by the company and/or the customer. Regardless of the customer's stance on this, smoking may never take place within 20' from flammable/combustible materials, or within 50' of an excavation.

Check the weather for extreme conditions prior to reporting to work. Dress in layers, keep skin dry and covered, and avoid caffeine when the temperature is below 32-degrees. Apply sunscreen, stay hydrated with sports drinks, and take frequent breaks when the heat index is above 100-degrees,

Clean, cover or avoid slick work surfaces. Oil and grease should be cleaned-up immediately. Ice and snow should be covered with sand or salt. If forced to walk on slick surfaces take slow/wide steps. Monitor the jobsite for dangerous animals and poisonous plants whenever working near residential homes or areas of thick vegetation. Never pet or approach a stray animal. Wash hands and decontaminate tools/clothing if contact is made with poisonous plants.

Proper lifting techniques shall be used at all times and help must be requested whenever lifting anything that weighs more than 50-pounds. Other ergonomic risk factors that should also be avoided include: using excessive force to push/pull, maintaining an awkward posture for extended periods of time, and exposure to intense or prolonged vibration.

Hazardous conditions, unsafe behaviors & incidents shall be reported to the Foreman immediately.

Hand & Power Tools

All power tools must be double insulated, or the plug must be equipped with a ground pin. Cords of power tools shall remain free from defects such as cracks, frays, cuts or nicks.

Ground Fault Circuit Interrupters will be used on every outlet located in a construction environment.

Absolutely no employee is to remove a guard, handle or any other device from a tool. Guards shall be in place and operate at all times while the tool is in use. The guard may not be manipulated in such way that will compromise its integrity or compromise the protection in which intended.

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 shall be provided with particular PPE necessary to protect them from the hazard.

Employees shall tie back long hair; remove jewelry, and roll-up long sleeves to prevent entanglement before operating rotating tools.

Defective hand tools such as hammers with broken or cracked handles, chisels and punches with mushroomed heads, wrenches with sprung jaws, bent/broken wrenches, or power tools shall be removed from service (locking the controls on power tools to make them inoperable if necessary) and tagged immediately.

Only employees who have been trained in the safe operating procedures of powder actuated tools and have received a certification card will be allowed to operate powder actuated tools.

Powder actuated tools must be inspected on a daily basis & prior to loading the tool each time. These inspections shall include if the tool is already loaded, if it has any missing or altered parts, or if any other visual defects are noticed.

All powder actuated tools shall be completely disassembled, thoroughly cleaned, & then reassembled at least once a week. Operators must use caution to make sure all parts are reassembled exactly where they are supposed to go.

All employees who operate powder actuated tools will be required to wear eye and ear protection throughout operation. Face shields will be available for voluntary use.

Operators shall inspect the work area before using powder actuated tools to make sure that flammable or combustible materials are not within a 20' radius.

Powder actuated tools will only be used on steel, concrete or block. Never should these tools be used on wood or any other thin material in which the nail could escape through the other side. Even when using these tools on the proper materials, operators should inspect the other side of materials to make sure nobody is positioned on the other side.

Only fasteners specifically designed for powder actuated tools may be used.

If boosters are dropped while being used/handled they must be picked-up immediately. Boosters shall be stored in the box that they came in & kept in a safe/secure location.

Handling Plastic Pipe

Complete sections of plastic pipe that are 6" in diameter or greater must be moved and maneuvered by equipment (not by hand). When fusing, a backhoe and strap shall be used to pull the pipe.

Care must be used to prevent unexpected shifting or movement when handling or moving coil pipe.

Both sides of coil pipe must be secured before cutting it.

Whenever unrolling coil pipe, employees should either avoid walking backward or frequently scan behind them while walking (to prevent tripping over objects or falling into excavations).

Hazard Communication

A Safety Data Sheet (SDS) will be obtained for every hazardous chemical that Miller Pipeline uses. These SDS will be logged on a chemical inventory list and then placed into a master binder that will be maintained in our warehouse. SDS' may also be obtained through calling Verisk 3E.

All primary and secondary hazardous chemical containers will be properly labeled with chemical identification, hazard warnings, and the name/address of the manufacturer.

To avoid potential chemical over exposure, employees should never mix chemicals that are not properly labeled, assume an unlabeled container is harmless, or remove a label.

Adequate levels of PPE (e.g. safety glasses, rubber gloves) shall be worn whenever handling hazardous chemicals in a way that could cause an exposure incident. After handling chemicals in this way, employees shall discard their PPE and wash their hands before eating, drinking or smoking.

Any type of chemical spill (regardless of the type or amount) shall be reported to the Safety Director.

Hearing Conservation

Each area or task that could potentially exceed OSHA's "action level" will be monitored by a competent person. Copies of the monitoring results will be made available upon request.

At this time the only activities at Miller Pipeline that are known to be above OSHA's "action level" and therefore *require* the use of hearing protection are operating a jackhammer, hydrovac work, tamping or working around heavy equipment.

Whenever performing these tasks, a form of hearing protection must be worn. All types of hearing protection must be worn properly and either cleaned or discarded daily.

Housekeeping & Sanitation

Maintain proper housekeeping throughout each workday. Intentionally place all tools, cords, hoses and other unused materials out of walkways to avoid creating unnecessary trip hazards. Dispose of any hazardous waste by contracting a licensed hazardous waste hauler.

When employees are performing work on a jobsite that does not have a portable restroom facility nearby, they will be permitted to use the restroom facilities at a local business. Urinating or excreting on public property or in a container on the jobsite is not allowed.

Employees are encouraged to wash their hands before they eat, drink or use tobacco products. Soap and paper towels will be made available onsite for this reason.

Laser Safety

Only authorized employees who are experienced and trained in the safe operations of lasers are allowed to use them. These individuals are required to carry proof of training with them.

Warning signs must be posted in work areas when lasers are being used.

Lasers may never be aimed directly at someone's eye, or set-up at eye level. Employees shall avoid looking directly into a laser light.

Lasers must be turned off or capped/shuttered when left unattended for an extended period of time (i.e. longer than 5-10 minutes).

The use of lasers is prohibited when it is raining, snowing, foggy, or if there is heavy dust in the air. Such conditions may deflect the beam.

Lockout/Tagout

If equipment could unexpectedly become energized and cause injury while an employee is working on it, that piece of equipment shall be completely de-energized and locks shall be placed on all controls so that it cannot be operated. This process is referred to as "Lockout/Tagout". Potential energy may include any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

Only employees who have been authorized by the company and have completed Lockout/Tagout training are permitted to perform Lockout/Tagout activities.

Locking and tagging devices that are uniform in size, color and shape will be issued by the company to use for Lockout/Tagout purposes. These devices shall be inspected daily and maintained in good condition. Using them for any purpose other than Lockout/Tagout is not allowed.

A few of the more critical precautions associated with practicing Lockout/Tagout include: coordinate the event with everyone who could be affected by it; attempt start-up after applying the locks to verify successful lockout; make sure the key is in the sole possession of the employee who applied the lock; and make sure all locks are accompanied by completed tags.

Personal Protective Equipment

Miller Pipeline will provide and pay for all PPE that is required by this program other than general work attire (e.g. long pants, shirts, work boots, etc.). Employees may choose to provide their own PPE as long as it meets ANSI and company specifications.

All PPE (including employee provided equipment) shall be inspected daily for defects, replaced if found defective, stored in a way that does not promote damage, and cleaned regularly.

All employees must wear long pants that reach their boots (no holes or tears), shirts with at least 4" tailored sleeves, and durable safety shoes whenever present in a shop, maintenance or construction environment.

Hardhats, safety glasses, high visibility vests (Class 2 or higher, per customer requirements), safety shoes, and gloves appropriate for the task must be worn whenever performing construction activities.

Some common tasks that would require safety glasses include: operating tools, striking objects together, grinding metal/scaling pipelines, handling chemicals, charging batteries, being near welding/cutting, etc. Additional protection shall be worn when safety glasses won't provide enough protection, such as goggles or face shields. Goggles shall be worn whenever working with compressed air. Welder's helpers or anyone in the vicinity of welding activities must wear goggles or foam-lined safety glasses to prevent debris from entering the eyes. Face shields shall be worn when operating vacuum excavators and air lances, grinding metal, and handling caustic/acidic chemicals.

Gloves must be worn whenever performing a task that could result in a hand abrasion, laceration, puncture, burn, or blood/chemical exposure. Some tasks that require hand protection include: manually handling materials, operating non-rotating tools, using sharp objects, handling chemicals, performing first-aid/CPR, welding or torch cutting. Employees must make sure they select the proper type of hand protection according to the task they are performing.

Powder Actuated Tools

Only employees who have been trained in the safe operating procedures of powder actuated tools and have received a certification card will be allowed to operate powder actuated tools.

Powder actuated tools must be inspected on a daily basis & prior to loading the tool each time. These inspections shall include if the tool is already loaded, if it has any missing or altered parts, or if any other visual defects are noticed.

All powder actuated tools shall be completely disassembled, thoroughly cleaned, & then reassembled at least once a week. Operators must use caution to make sure all parts are reassembled exactly where they are supposed to go.

All employees who operate powder actuated tools will be required to wear eye and ear protection throughout operation. Face shields will be available for voluntary use.

Operators shall inspect the work area before using powder actuated tools to make sure that flammable or combustible materials are not within a 20' radius.

Powder actuated tools will only be used on steel, concrete or block. Never should these tools be used on wood or any other thin material in which the nail could escape through the other side. Even when using these tools on the proper materials, operators should inspect the other side of materials to make sure nobody is positioned on the other side.

Only fasteners specifically designed for powder actuated tools may be used.

If boosters are dropped while being used/handled they must be picked-up immediately. Boosters shall be stored in the box that they came in & kept in a safe/secure location.

Respiratory Protection

The Corporate Safety Specialist or a third party Certified Industrial Hygienist (CIH) will conduct air monitoring whenever a task involves exposure or potential exposure to toxins or contaminants that can become airborne, based on the scope of work. If OSHA's "permissible exposure limits" are exceeded, the CIH will assist the Safety Director with identifying the proper controls to implement (including the possible use of a respirator).

If the determination is made that a respirator must be worn, all employees who are expected to wear one shall be medically evaluated. This evaluation will include a pulmonary function test and must take place prior to initial use and annually thereafter.

Respiratory equipment will be provided to employees at no cost.

When tight fitting respirators are required, all employees must be fit tested. This test will be conducted by the Safety Director and will be done using the same make, model and size of respirator that will be used during normal work procedures.

Employees shall inspect respirators prior to each use in order to make sure they are in good operating condition and that no parts are defective. If defects are noticed the unit must be removed from service until necessary repairs can be made.

All respirators shall be kept clean and stored in a way to protect against dust, sunlight, heat, extreme cold, excessive moisture, damaging chemicals, and physical damage (i.e. placed in a sealed bag and never hung from their straps).

Employees who wear tight fitting respirators must be free from any facial hair that could prevent the wearer from obtaining a proper seal (i.e. a full beard could not be worn, but sideburns and/or a mustache or tight goatee could be acceptable as long as the seal does not overlap the area).

Rigging Safety

Employees who connect, adjust, or inspect rigging will be trained as “Qualified Riggers”. This training will include items such as: how to identify defects, proper connection, identifying load weight and machine capacity, the importance of centering loads, and knowledge of various types of rigging and rigging components (i.e. bolts, hooks, etc.). Employees may not rig without completing this training.

Rigging must be informally inspected prior to each day of use and deemed to be in good condition (i.e. no bends, kinks, or frays; hooks not bent and equipped with latch, etc.). Formal more comprehensive inspections will be performed once a month by a Qualified Rigger by completing the *Rigging Monthly Inspection Report* (located in the Forms Section). If any defects are noticed the unit shall be tagged as “Out of Service” and removed from use immediately.

Hooks on overhaul ball assemblies, lower load blocks, or other attachment assemblies shall be of a type that can be closed and locked, eliminating the hook throat opening. Alternatively, an alloy anchor type shackle with a bolt, nut and retaining pin may be used.

All chains, slings, and other forms of rigging must be tagged or stamped with their maximum rated load capacity and/or approved configurations. These capacities shall never be exceeded, and only approved configurations shall be used when connecting rigging.

Tag lines shall be used unless their use creates an unsafe condition.

Rigging shall always be placed in the center of each load in order to ensure proper balance. If load is awkward to handle or the balance is unstable, then tag lines shall be used.

Scaffolding Awareness

A “Scaffolding Competent Person” must be present on the jobsite whenever scaffolding is being erected or dismantled. These individuals will be issued comprehensive formal training, so they are well equipped to identify scaffold hazards & given authority to stop a job until those hazards are corrected.

Scaffolds and scaffold components will be capable of supporting, without failure, its own weight and at least 4 times the maximum intended load. This makes it important for users to know the rated capacity of the scaffold and to limit the weight loaded onto the decking.

Platforms shall be cleated or secured to prevent displacement during use.

Wheels must be locked before mounting a mobile scaffold and stay locked until all users dismount. Scaffolds may not be moved by users or nearby coworkers while in use.

Scaffold units must be secured to a nearby structure whenever they are four (4) times higher than they are wide. Outriggers approved by the manufacturer may be used in lieu of securing the scaffold, if it reduces the height to width ratio less than 4:1.

Either personal fall arrest systems or guardrail systems shall be used on scaffold units whenever the working platform is elevated ten (10) feet or more above the ground. Personal fall arrest may not be anchored to the scaffold unit.

Guardrail systems will be constructed along all open sides and ends of the platform. Toe boards must also be placed along all open sides of the platform if individuals could be positioned below, and the area is not barricaded.

Competent Persons shall conduct a formal documented inspection of each scaffold unit daily. These inspections will be documented by placing tags on the units. These tags will identify the inspector, date of inspection & if the unit is deemed as being safe or if it’s “Out of Service”.

A scaffold that is tagged as “Out of Service” it is not to be used until proper repairs are made.

Walkways must be at least 18” wide. Working platforms must be fully planked (no more than a 1” opening) and be equipped with 4” toe boards on all sides. All boards must either be secured to the frame or overlap by at least 12” with the overlap resting on a support.

A suitable ladder system must be provided that allows employees to safely access & exit each walkway and work platform.

Excess materials and/or debris will not be allowed to accumulate on walkways or work platforms.

Silica Awareness

Miller Pipeline employees could perform various tasks or work in certain areas where there is a potential for Crystalline Silica exposure. Mainly this exposure could occur when disturbing concrete or pavement. All employees shall know and follow all control measures prescribed in the Silica Exposure Control Plan.

If working in an area where another company is performing a task that is creating an exposure to Crystalline Silica, our employees should either discuss the issue with the other contractor by asking them to use the “wet method” or vacate the area until the work is finished.

Areas where concrete/pavement dust is present should be cleaned using water before beginning work. Using air hoses or sweeping such debris is not an approved method for cleaning silica dust.

Spotting Equipment & Vehicles

When maneuvering vehicles or equipment (forward or backward) in a “hazardous location” such as a substation, congested area, or high traffic area, the Operator must first walk the path of travel in order to identify all potential hazards. They must then assign at least one spotter *per identified hazard* and instruct those spotters on what to watch for. The Operator must also maneuver the vehicle/equipment in a slow controlled manner, maintain adequate communication with all spotters, fully obey their commands, and stop immediately if communication ceases

Spotters must discuss hand signals with Operators before spotting. While spotting they must maintain a safe distance of 10’ from the vehicle/equipment, avoid pinch points, and walk sideways so they can scan the operating area as well as look where they are stepping. Spotters may not use cell phones, hold conversations with anyone other than their assigned Operator, or perform other tasks that may distract them from spotting.

Situations that require the use of spotters on jobsites shall be documented on the Job Hazard Analysis form (located in the Forms Section). The situation, hazards involved, and number of spotters shall be included on the form. Anyone who does not feel comfortable with operating equipment or spotting in a hazardous situation should stop and notify their supervisor before proceeding.

Stairways & Ladders

A stairway or ladder will be provided at all access points where there is a break in elevation of 19-inches or more.

All stairways will be at least 22 inches wide and either enclosed or equipped with a railing system on all open sides. Stair steps must be level, without defects, and uniform in height. If stairs are placed directly outside of a door, a landing must extend at least 20-inches beyond the swing radius of the door before the first step begins.

Ladders must be inspected daily before each use for defects such as: missing or dysfunctional parts, dents in aluminum ladders, cracks in wooden ladders, functionality of spreaders and footers, etc. Any ladders that are found defective must be tagged "Out of Service" and not used until repaired.

Ladders cannot be homemade or modified in any way, and they must be used as they are designed (i.e. folding ladders cannot be placed up against a wall like a straight ladder, etc.).

Portable ladders must either be placed on a firm level foundation or properly secured, set at a 4:1 angle, and the side rails must extend 36" above the landing.

When using a ladder, employees should always face the ladder, keep their belt buckle between the side rails, maintain three points of contact, and never stand on the top step.

Traffic Zone Safety

Whenever working in a public roadway traffic control must be set-up in a way that complies with the most recent edition of the Manual on Uniform Traffic Control Devices (MUTCD).

At least 10' of a lane must be left unobstructed or the entire lane must be shut down.

At least one (1) approved warning sign must be placed at all entrances into the work zone. This sign shall properly identify the required action ahead and be placed at least 100' away in 30mph zones (or less), 350' away in 35-40mph zones, and 500' away in 45mph zones (or more).

Channelizers (cones/barrels) must be used to establish a gradual transition/taper as vehicles enter the work area and then span the length of the work zone. The angle of the transition/taper and spacing of the channelizers must comply with the MUTCD requirements. Channelizers shall be of the same type/size/color, spaced evenly apart, reflective if used at in the dark, and at least 18" tall (28" if used in a +40mph zone or in the dark).

If two oncoming lanes are forced to share a lane, then a flagger (or flaggers) must be adequately positioned so they can safely control both lanes of traffic.

Flaggers must be positioned on the side of the road while facing traffic and they must remain focused on the sole task of flagging. They may not sit down, turn their back to traffic, or engage in other activities that could distract their attention (i.e. phone use, etc.). They must also use a stop/slow paddle (not flags) mounted on a rigid staff that is high enough to allow oncoming traffic to see it. Two-way communication devices should be used when there are obstructions in the work zone. This includes curves in the road that may limit visibility.

Trenching & Excavating

An "Excavation Competent Person" must be present on the jobsite whenever excavating is being performed. These individuals will be issued comprehensive formal training, so they are well equipped to identify excavation hazards & given authority to stop a job until those hazards are corrected. At least 48-hours prior to conducting any excavation work, a request shall be submitted to 811 for locating & marking all nearby underground utilities. Once all utilities are marked, they shall be safely exposed using soft digging methods. Mechanized equipment must stay at least 18-48 inches away from underground utilities (which is to include half the diameter of the utility present), depending on state laws.

All nearby objects that could become unstable while excavating shall be properly secured before mechanized equipment is used (e.g. trees, fences, signs, etc.).

All employees and pedestrians should stand at least 10' from excavating equipment and never within the swing radius of the boom (this includes coworkers who are swamping and spotting utilities).

Excess spoil, rocks & other loose debris must be kept at least 2-feet away from trench edges.

If soil is discolored, an oily sheen appears on top of ground water, or if there is a foul odor, the crew shall stop work immediately and notify the Safety Director. The source of contamination will then be identified, monitoring will be conducted, and precautions may be taken if necessary to avoid exposure.

Competent persons must formally inspect each excavation by completing the *Excavation Inspection Log* (located in the Forms Section). These inspections shall be done before initial entry, daily thereafter, and as conditions change.

A protective system such as sloping/benching, shoring, or shielding (i.e. trench boxes) must be used if an excavation is greater than 5' deep or otherwise deemed unsafe by the Competent Person. Each of these systems shall be installed & used as approved by the manufacturer.

Excavations shall be kept free from excess water build-up as much as possible.

A ladder, steps, or a ramp must be used in excavations that are over 4' deep and placed every 25' in longer trenches.

Excavations must be properly barricaded to prevent unauthorized entry before they are left unattended. In most cases construction fencing or 2-3 rows of caution tape will suffice.

Welding & Cutting

Only employees who have been trained and authorized are permitted to perform welding, cutting, brazing or other "hot work" operations.

Prior to conducting hot work on anything the material must be inspected for inhalation & explosion hazards (i.e. cutting a container that carried a flammable liquid, welding a coated pipe, welding stainless steel, etc.). Precautions must then be taken to avoid any hazards detected (i.e. purge or fill flammable containers, remove coatings 4" on each side of the hot work, use mechanical ventilation).

The work area must be inspected before conducting hot work and all flammable/combustible materials shall be moved at least 20' away or otherwise protected/covered to prevent ignition.

A *Hot Work Permit* (located in the Forms Section) shall be completed, authorized & posted before performing hot work in a potentially hazardous environment.

All exposed skin must be covered with a flame-resistant fabric (e.g. cotton, denim, leather, etc.) prior to performing hot work. Synthetic fabrics (e.g. polyester, rayon) may not be worn when performing hot work, even if it is worn underneath a flame-resistant fabric. This clothing should not have pockets and should be completely buttoned up to avoid catching hot debris.

Employees performing hot work must wear properly shaded eye and face protection (i.e. 10-14 shaded helmet when electric welding, 4-8 shaded goggles when gas welding, 2-3 shaded glasses when torch cutting, etc.). Other precautions shall also be taken to protect other employees in the area (i.e. welding curtains, shaded eyewear, etc.).

A trained fire watch must be used whenever hot work is performed. This individual must be equipped with a type 2A extinguisher, approximately 10-15' away, present the entire time hot work is being performed, remain in the area 30-minutes after the hot work is done to watch for smoldering, and not engage in any distracting activities during this time (i.e. cell phone use, other work, etc.).

Whenever electric welding: ground clamps shall be securely fastened to a good ground source, cables shall be free from any damage, electrode holders must be fully insulated and kept away from wet areas, and electrodes shall be removed with the power supply off when the equipment is unattended.

Whenever torch cutting: torches shall be equipped with flashback arresters, cylinder valves may only be turned 1.5 times in the "open" position, gauges shall be legible, and valves must be turned off immediately if the gauge displays excess pressure.

Training Requirements

All employees will be trained in the recognition, avoidance and prevention of unsafe conditions and acts according to this policy during Safety Orientation.

Training and Education

Purpose

To educate employees on the company's safety requirements and satisfy OSHA's regulations on training.

Scope

This section applies to all company employees.

Definitions

Safety Orientation: A thorough classroom training session that will educate employees on company policies and government regulations.

Responsibilities

Orientation Admin

Facilitates the Computer Based Training (CBT) portion of New Hire Orientation.

Safety Director

Ensures safety orientation is conducted.

Provide agenda and content for Monthly Safety Meetings.

Maintain documentation of all training activities (e.g. classes, toolbox talks, safety meetings, etc.).

SQC/RTT

Ensures the completion of classroom hands-on training portions of Safety Orientation

Superintendents

Oversee the mentoring process of new employees.

Participate in the facilitation of periodic company safety meetings.

Foremen

Conduct Daily Huddles/Toolbox Talks.

Employees

Attend all required safety training events.

Procedures

Communication & Language Barriers

It is the intent of Miller Pipeline to hire employees who speak and read English when possible. However, in the event that an individual is hired that does not speak or read English, the following accommodations will be made to ensure their safety:

- All policies, procedures & forms will be produced in the necessary language.
- All warning signs, labels & stickers will be produced in the necessary language.
- Training will be presented using the necessary language (i.e. bilingual instructor, interpreter, handouts/tests/toolbox talks published in the necessary language, etc.).

If an employee is illiterate their Foreman will be notified and instructed to read all precautions or instructions to the employee when necessary. If the individual is required to take a test, the instructor will read the test to the individual and complete the test for them (without changing their answers).

Safety Orientation

All employees must complete Safety Orientation before they are allowed to perform any work for the company. Training will be conducted by the SQC or RTT, or designated individual, at the Regional office.

The individual topics that will be discussed during this phase include:

▪ President & COO Statement	▪ Damage Prevention Plan	▪ Lockout-Tagout (Awareness Level)
▪ Annual Goals	▪ Directional Boring	▪ Mobile Equipment
▪ Employee Responsibilities	▪ Electrical Safety	▪ Personal Protective Equipment
▪ Substance Abuse	▪ Emergency Response	▪ Process Safety Management
▪ Incident Reporting	▪ Fall Protection	▪ Signs & Tags
▪ Injury Care	▪ Fire Extinguisher Operation	▪ Silica Awareness
▪ Medical Records	▪ Fire Prevention & Protection	▪ Stairways & Ladders
▪ Disciplinary Action	▪ First-Aid Awareness	▪ Stop Work Authority
▪ Abrasive Blasting	▪ Fleet Safety	▪ Traffic Control & Flagging
▪ Asbestos Awareness	▪ General Health & Safety	▪ Trenching & Excavation Safety
▪ Benzene Awareness	▪ Hand & Power Tools	▪ Vacuum Excavations
▪ Bloodborne Pathogen Awareness	▪ Hazard Communication	▪ Welding & Cutting
▪ Compressed Air & Gas	▪ Hearing Conservation	▪ Wildfire Prevention
▪ Confined Space Awareness	▪ Housekeeping & Sanitation	
▪ Cranes & Rigging Awareness		

Supplemental Training

Training topics that do not apply to all employees and are fairly lengthy to cover will be conducted outside of Safety Orientation for each affected employee. The following table identifies each of these topics, who the affected employees are, how often each course must be instructed, and reference information for training requirements.

FREQUENCY	TRAINING TOPIC	AFFECTED EMPLOYEES	REFERENCE
2-Years	First-Aid/CPR/AED	Employees, including Confined Space Attendants	29 CFR 1926.50
3-Years	Forklift Certification	Forklift Operators	29 CFR 1910.178(l)
5-Years	Crane Certification (NCCCO)	Crane Operators	29 CFR 1926.1427
Once	Qualified Rigger & Signal Person	Crane Riggers & Signalers	29 CFR 1926.1404, 1428
Once	Lockout/Tagout (Authorized Level)	Lockout/Tagout Users	29 CFR 1910.147(l)
Once	Confined Space Entry	Confined Space Employees	29 CFR 1910.146(g)
Once	Fall Protection Competent Person	Foremen & Above	29 CFR 1926.503
Once	Excavation Competent Person	Foremen & Above	29 CFR 1926.651(k)(1)

Training & Education	Program Administration	Miller Pipeline
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Once	Drug & Alcohol Supervision	Safety Director, SQCs, & Safety Managers	29 CFR 382.603
Once	HAZWOPER 40-Hour	Handling Hazardous Materials	29 CFR 1926.64(g)
Once	OSHA 10-Hour Certification	President & Superintendents	NA
Once	OSHA 30-Hour Certification	Safety Director & Safety Department	NA
Once	Program Administration	Foremen & Above	"Safety Responsibilities" Policy
Once	Job Hazard Analysis	Safety Director & Foremen	"Hazard Analysis" Policy
Once	Safety Inspections	Safety Director, Safety Specialists, SQCs, & Superintendents	"Safety Inspection" Policy
Once	Incident Investigation	Safety Director, Safety Specialists, SQCs, & Superintendents	"Incident Investigation" Policy

All Safety Personnel will receive any additional training programs they need in order to effectively perform their responsibilities.

Annual Refresher Training

In order to remain in compliance with OSHA's and CCS training requirements, all affected employees will be trained on the following topics once a year:

- Asbestos Awareness
- Bloodborne Pathogens
- Confined Space Awareness
- Crane Safety
- Electrical Safety
- Emergency Response
- Fire Extinguisher Operation
- Hazard Communication
- HAZWOPER 8-Hour
- Hearing Conservation
- Ladder Safety
- Lockout Tagout
- Personal Protective Equipment
- Respiratory Protection
- Rigging Safety
- Silica Awareness

Daily Huddles/Toolbox Talks

Foremen will gather their crew daily, discuss any hazards observed in the pre-job walk, open-up dialogue about crew-specific safety issues that have been noticed recently or that are anticipated in the near future, ask if anyone has any project-specific safety suggestions to submit for the week, complete the *Daily Huddle Form* (located in the Forms section), and forward the document to the Safety Director.

Monthly Safety Meetings

Once a month all employees will be brought into the main office for a company safety meeting. These meetings will be facilitated by the Safety Department but will also allow time for the President & COO, Superintendents, and any guest speakers to participate as well. The main focus of these meetings will be to inform all employees about the company's safety performance, educate everyone on lessons learned from recent incidents, gather their input on potential changes, provide updates on previous changes, and conduct refresher training.

Training Content & Documentation

PowerPoint presentations, pictures, DVDs, hands-on exercises and other training aids will be used when conducting Safety Orientation, supplemental training classes, and Monthly Safety Meetings in order to enhance the presentation of the material. However, the majority of the training programs will be presented in a form where employees can give and receive feedback.

All safety training events and meetings shall be documented on the *Training Attendance Sheet* (located in the Forms Section). Applicable topics will also include a knowledge check at the completion of training. Each employee's training records will be kept in their personnel file for at least the length of the individual's employment plus 5-years.

Training Requirements

All affected Miller Pipeline employees will be trained according to this policy.

Hazard Analysis

Purpose

Establish a systematic approach of identifying the hazards associated with the tasks we perform and then deciding how to eliminate or control those hazards.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

Safety Director

Conduct a formal Job Hazard Analysis (JHA) whenever a new process or piece of equipment is introduced and review/modify existing JHA's when an incident, near-miss, or employee complaint occurs. New JHA's will be documented on the *Job Hazard Analysis* form (in the Forms section).

Score risks that involve corporate change and prioritize their implementation according to this plan.

Foremen

Conduct a formal Job Hazard Analysis (JHA) prior to beginning a new project by completing the *Job Hazard Analysis* form (located in the Forms Section) and review the results with all crew members prior to commencing work. Then review each JHA with the crew daily thereafter to discuss critical points and identify revisions that need to be made.

Procedures

Job Hazard Analysis

Foremen will conduct a formal Job Hazard Analysis prior to beginning a new project and review the results with all crew members prior to commencing work. They will also review the form with all crew members daily thereafter to discuss critical points and identify any revisions that need to be made.

The Safety Director will conduct a formal Job Hazard Analysis (JHA) whenever a new process and/or piece of equipment are introduced. In addition, existing JHA's will be reviewed and modified whenever an incident, near-miss incident, or employee complaint occurs.

All JHA's will be documented by completing the *Job Hazard Analysis* form (located in the Forms section).

Scoring Risk & Prioritizing Controls

If a hazard is identified that may require a corporate change in order to control the risk (e.g. policy revision, process modification, equipment investment, etc.), it must be reported to the Safety Director immediately. The Safety Director will then evaluate the risk using a severity/probability model similar to the one below. Once determined, the Safety Director will collaborate with the appropriate personnel/departments to develop and implement corrective measures.

SEVERITY	SUB-SCORE	PROBABILITY	SUB-SCORE
Fatality	10	Exposed Daily	5
Disability	8	Exposed Weekly	4
Medical Treatment	6	Exposed Monthly	3
First-Aid	4	Exposed Quarterly	2
Discomfort	2	Exposed Annually+	1

Training Requirements

The Safety Director and all Foremen will be trained on how to conduct an effective Job Hazard Analysis.

Safety Inspections

Purpose

To establish a system of monitoring and correcting unsafe behaviors & physical hazards on job sites before they result in an incident or OSHA violation.

Scope

This section applies to all company employees.

Responsibilities

Vice President of Environmental, Health, and Safety

Randomly conduct unscheduled inspections of jobsites.

Safety Director/Safety Specialist/SQCs

Conduct unscheduled formal inspections of crews on a regular basis.

Track the completion of corrective actions for hazards that can't be addressed during an inspection.

Maintain documentation of all inspections & enter results into a database.

Superintendents

Conduct unscheduled formal inspections of every crew at least once a week.

Oversee the timely implementation of corrective actions.

Employees

Constantly monitor coworkers for safe/unsafe behavior, reinforce positive behavior, and correct negative behavior.

Procedures

Superintendents will conduct formal documented inspections of each crew once a week. The Safety Director/Safety Specialists/SQCs will conduct formal documented inspections of crews on a regular basis. These inspections will be documented by completing the *Safety Inspection Report* (located in the Miller Pipeline Hub) or by completing online through Safety Net.

Copies of all completed reports will be given to the Safety Director, Superintendent & Foreman. Information from the reports will also be available through Safety Net so that it can be sorted for analysis.

Corrective actions for hazards that cannot be abated during inspections will also be logged into a database so the completion of those actions can be tracked.

The Safety Director will review all *Safety Inspection Reports* monthly in order to identify those who may need coaching on how to improve the effectiveness & thoroughness of their inspections.

Safety inspection scores will be taken into consideration when conducting performance reviews.

Training Requirements

The Safety Director, Safety Specialists, SQCs, and all Superintendents will be formally trained on how to conduct an effective and thorough safety inspection.

Incentive Plan

Purpose

Stimulate a positive safety culture by motivating employees to work safely & rewarding those who do.

Scope

This section applies to all field construction employees at the Foreman level and below.

Responsibilities

President & COO

Establish a budget each year for this Incentive Plan.

Safety Director

Oversee the purchase, distribution & management of incentive program materials.

Superintendents

Communicate information to all employees.

Procedures

Program Administration

This program rewards employees for safe work on an individual basis, and pays employees each quarter who meet a pre-determined set of safety metrics.

It could change year to year, but will involve all field employees.

Miller Pipeline also rewards the “safest” areas each year with the “Safety Excellence” award. This award is based on the amount of hours worked and winners receive a plaque, company swag, and recognition in company communications and events.

Everyone’s roles and responsibilities will be communicated before the new plan is active.

Any and all changes to this program will be reflected in writing and communicated to all eligible employees before the changes become effective.

Training Requirements

All employees will be educated on the contents of this policy.

Disciplinary Action

Purpose

To establish a fair and consistent approach for correcting the unsafe behaviors of Miller Pipeline employees and subcontractors.

Scope

This section applies to all company employees and subcontract employees.

Responsibilities

Safety Director

Reviews any company employee who violates a government regulation, company safety policy, or generally accepted safe work practice.

SQC/Regional Safety, Quality, and Compliance Coordinator/Superintendent

Conducts physical inspections of work areas to ensure compliance with safety rules and policies.

Issue a *Disciplinary Action Form* to any company employee who violates a government regulation, company safety policy, or generally accepted safe work practice.

Oversees the performance of subcontractors.

Foreman

Issue a *Disciplinary Action Form* to any company employee who violates a government regulation, company safety policy, or generally accepted safe work practice.

Procedures

Authority of Action

All Executives, Managers (including the Safety Director) & Superintendents are fully authorized to issue any level of disciplinary action, including termination. Foremen are authorized to issue disciplinary action up to a written warning. Employees below Foreman may not issue disciplinary action.

Disciplinary Procedures

If a Miller Pipeline employee violates a written company safety policy or a federal/state/local law, or otherwise engages in unsafe behavior while at work, they may be issued disciplinary action.

Disciplinary Procedures (continued...)

The company reserves the right to issue disciplinary action to an employee who fails to report work-related injuries. However, disciplinary action will only be given if the employee was given an adequate amount of time to notice the symptoms. For example, if an employee strains a muscle at work but the symptoms don't surface until the next day at which time the employee reports the symptoms immediately, disciplinary action will not be issued.

Stages of Action

In order to ensure fair and consistent disciplinary actions are being taken, the following levels of action should be issued in the order they are listed:

- **LEVEL 1:** Verbal Consultation
- **LEVEL 2:** Written Warning
- **LEVEL 3:** Unpaid Suspension
- **LEVEL 4:** Termination

All levels of company representatives shall try to adhere to this plan as much as possible. However, the severity and circumstances of each incident are often different and need to be considered on a case-by-case basis. Therefore, the progressive structure previously listed may be deviated from if approved by the President & COO or Safety Director. This deviation may also include other forms of disciplinary action, such as: re-training, consultation with a manager, incentive removal, demotion, etc.

Zero Tolerance Policies

In order to deter and prevent severe injury or death, Miller Pipeline will immediately terminate any employee who violates the following requirements on the first offense:

- Do not report to work while under the influence of drugs or alcohol.
- Test all confined spaces before entering the space.
- Work in an excavation not protected from collapse with a protective system.

Documentation

All levels of disciplinary action must be documented using our *Disciplinary Action Form*. Completed forms shall be sent to the Safety Director and HR Department, who will review, log and file them. All *Disciplinary Action Forms* shall be maintained in the employee's personnel file at least until the individual's employment ends with the company.

Training Requirements

The contents of this policy will be reviewed during Safety Orientation.

Incident Reporting & Management

Purpose

To ensure employees receive the best health care available from a healthcare professional who is familiar with occupational medicine, workers compensation laws & OSHA recordability.

Scope

This section applies to all employees of Miller Pipeline.

Definitions

MEDICAL RECORD: A record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician.

NEAR-MISS INCIDENT: An event or situation that could have resulted in personal injury or property damage, but did not either by chance or timely intervention.

Responsibilities

Corporate Risk Manager

Schedules and coordinates all examinations with employees and the clinic.

Evaluates work restrictions & lines-up light-duty positions when possible.

Maintains all medical documentation.

Foreman

Selects a designated health care facility to use for each jobsite at the beginning of the job.

Uses the *Emergency Response Checklist* when an incident occurs.

Reports all work-related illnesses & injuries to the Safety Director as soon as possible.

Employee

Immediately reports all accidents to the Foreman prior to seeking medical treatment.

Adheres to the work restrictions imposed by the doctor when performing a light duty job.

Procedures

Incident Reporting

All work-related incidents shall be reported immediately to the Foreman, Superintendent & Safety Director. This includes work-related injuries, vehicle accidents, property damages, thefts, vandalism, near-miss incidents, and non-work related injuries. Failure to report these incidents and any attempt to hide them or falsify facts may result in disciplinary action. Incidents must also be reported to the client as soon as possible. Each client can have different incident reporting timeframes, but nearly all require notification of an incident within 15 minutes. This is just a basic overview of the incident; a formal investigation will be submitted to the client within 24 hours or as soon as possible.

Upon experiencing an emergency situation on a jobsite, the Foreman is to pull this *Emergency Response Checklist* form out of the "Incident Packet" and begin using it as a guideline to assure they are properly managing the situation.

Once the Superintendent arrives, they should collect this form to continue using until all issues have been dealt with and the situation is under control. The following procedures shall be followed whenever an incident occurs:

INJURY & NEAR-MISS REPORTING (WORK RELATED)

In the event of a work-related injury or near-miss, employees are to take the following steps:

1. If any type of injury or near-miss incident occurs the Foreman shall be notified immediately.
2. If a life threatening injury is involved, the Foreman must:
 - a. Instruct someone nearby to call 911.
 - b. Issue medical treatment until EMTs arrive.
 - c. Notify their Superintendent, Safety Director/Specialists, Regional VP/Manager, Corporate Compliance Director (to identify DOT requirements for substance abuse testing), Corporate Risk Manager, and the Corporate Communication Director (if the media is involved).
3. If a non-life threatening injury is involved, the Foreman must:
 - Administer first-aid as necessary.
 - Notify their Superintendent, Safety Director/Specialists, Regional VP/Manager, Corporate Compliance Director (to identify DOT requirements for substance abuse testing), Corporate Risk Manager, and the Corporate Communication Director (if the media is involved).
 - Transport the injured employee to the designated clinic (if necessary).
4. Once all injuries and near-miss incidents are properly cared for and all appropriate parties are notified, the *First Report of Injury* form in the Miller Pipeline Hub should be completed and sent to the Corporate Risk Manager within 24-hours (even for near-miss & first-aid cases).

NOTE: If an employee doesn't detect a work-related injury or illness until they leave work for the day, they must contact their Foreman and/or our main office immediately and leave a message explaining the details, symptoms and how they can be contacted.

NON WORK-RELATED INJURY OR ILLNESS REPORTING

In the event of a non work-related injury, employees are to take the following steps:

1. Notify the Safety Director before reporting to work.
2. Give the Safety Director documentation from the treating physician that identifies the diagnoses & any work-restrictions that were issued.
3. Do not violate work-restrictions issued by the treating physician.
4. Give the Safety Director documentation from the treating physician as work-restrictions are modified and when released back to full-duty.

VEHICLE ACCIDENT REPORTING

In the event of a vehicle accident, employees are to take the following steps:

1. Notify the local police department immediately.
2. Notify your Foreman.
3. Take pictures of the scene/damage.
4. Complete the "*Vehicle Accident Report*" (located in the Forms section).
5. Send the report and pictures to the Corporate Risk Manager within 24-hours.
Foreman: Immediately notify the Corporate Risk Manager when you are notified.

PROPERTY DAMAGE REPORTING

In the event of property damage, employees are to take the following steps:

1. Notify your Foreman immediately.
2. Take pictures of the area & the damage.
3. Complete the *Property Damage Report* (located in the Forms section).
4. Send the report and pictures to the Corporate Risk Manager within 24-hours.
Foreman: Immediately notify the Corporate Risk Manager when you are notified.

THEFT & VANDALISM REPORTING

1. Notify the local police department immediately.
2. Notify your Foreman.
3. Take pictures of the scene/damage and send them to the Corporate Risk Manager within 24-hours.
Foreman: Immediately notify the Corporate Risk Manager when you are notified.

Facility Designation

Miller Pipeline has designated specific healthcare facilities to conduct all medical activities for employees within close proximity of our jobs. Employees will call the Injury Hotline to be referred to a specific clinic.

Communication of Medical Activities

The Corporate Risk Manager will communicate facts and other details that do not violate the employee's privacy to their Superintendent and Foremen before they return to work. This communication may be in person, over the phone, or through email.

Light Duty Program

Miller Pipeline will make every reasonable attempt to provide light duty work for employees who are issued work-restrictions by an approved physician for a work-related injury.

The Safety Director must receive copies of work-restrictions in order to provide light duty work to injured employees. Copies of these work restrictions shall be maintained by the claims department.

When an employee is issued valid work-restrictions, the company will attempt to meet the restrictions in the current job if possible. If this is not possible, the employee may be placed into an alternate position within the area (i.e. driving vehicles, video recording jobsites before start-up, etc.). If neither of these options is possible the company will pursue modified duty positions in the office or another location. If none of these options are possible, the company may pursue light duty positions with local charities or other nearby community organizations.

Employees issued light duty assignments will receive their standard rate of pay and shall be scheduled to work no more than 40-hours per week.

Employees assigned to light duty will be responsible for working within their work-restrictions and attending all follow-up appointments as scheduled. Failure to do so may result in disciplinary action.

If the company offers a light duty position and the employee rejects it, they will *NOT* be paid by the company or the insurance company for their time off.

Poor performance or failure to call/report to work while working a light duty position may result in disciplinary action, just as if they were performing their normal job duties.

Before an employee is allowed to return to their normal job functions, the treating physician must issue a documented release stating they can safely perform all normal job activities without any restrictions.

If the treating physician determines that an employee has reached "Maximum Medical Improvement" (MMI) and they issue permanent work-restrictions that interfere with their normal job functions, the company may transfer that employee to another position that will not interfere with their restrictions (if one is available). If this is not available, the company will continue to engage and evaluate interactively to determine next steps.

Claim Management

All work-related injuries will be reported to the insurance company by forwarding the completed *First Report of Injury* form to them within 48-hours of occurrence. All other related documentation will also be forwarded to them as the company receives it (i.e. work restrictions, etc.).

The Corporate Risk Manager will meet with the insurance company at least once a quarter to review claim activity from the previous quarter and all claims that remain "open". Additionally, representatives of the Safety, Risk, and HR Departments meet on a monthly basis to discuss and evaluate next steps regarding current and pending Work Comp claims for OOW employees/current Light Duty employees."

Near-Miss Management

The reporting of near-miss incidents shall be encouraged and promoted within Miller Pipeline in order to identify & address hazards *before* they result in an injury. In order to avoid any type of discouragement from reporting these types of incidents, we will not issue any formal disciplinary actions (other than maybe having a conversation with an employee about things that need to change) when a near-miss is reported, as long as it is initially reported by the individuals who are responsible for the incident.

Confidentiality of Records

Any medical records obtained by the company will only be shared with the employee, insurance company, legal counsel or the government upon request. Any other individual who wants to examine medical documentation must be granted permission by the injured employee via a written and signed letter of authorization.

Training Requirements

This policy will be reviewed during Safety Orientation.

Incident Investigation

Purpose

Establish a system of gathering information after an incident occurs in order to identify the cause(s) and implement control measures in order to prevent re-occurrence.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

Safety Director/Safety Specialists/SQCs

Review and validate all incident reports and findings.

Report lessons learned from each incident to management & all employees.

Notify OSHA within 8-hours of a fatality, and within 24-hours of an inpatient hospitalization of one or more employees, an amputation, or a permanent eye loss.

Superintendent

Formally investigate all reported incidents and interview employees.

Foremen

Report incidents to the Superintendent immediately.

Secure the scene until the Superintendent arrives.

Give honest input on what happened whenever being interviewed.

Employees

Report incidents to their Foremen immediately.

Give honest input on what happened whenever being interviewed.

Procedures

Scene Investigation

The Superintendent will conduct a formal incident investigation of all incidents with the help of the Foreman & employees who were involved. Incidents that involve serious injury or death shall be investigated immediately (i.e. they must stop what they are doing and travel to the site). Incidents that involve minor injury or near-miss shall be investigated within 24-hours of occurrence. Investigation equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, phone cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, etc.

Upon arriving onsite initial identification of evidence immediately following the incident might include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and

medical conditions. Next, the Superintendent shall interview *everyone* who was involved with the incident (not just our own employees). These interviews shall be held separately and open-ended questions will be used to avoid influencing their answers. The interviewer must obtain an appropriate interview location, and ensure unbiased testimony. They should inform the witness that there may be a need for a follow-up interview. After conducting interviews the Superintendent will gather other evidence, such as: pictures, video footage, work orders, blue prints, area maps, field notes, damaged parts, tools used, etc.

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.

Once all interviews are conducted and evidence is gathered, the Superintendent will complete the *Incident Investigation Report* (located on the Miller Pipeline Hub).

Data Analysis

After the field investigation is complete all reports will be forwarded to the Safety Director who will review and validate the findings.

If a minor injury or near-miss occurred, the reports will be reviewed with the investigating Superintendent within 48-hours of initial notification.

If a serious injury or death occurred, the reports will be analyzed with the help of a committee who will conduct a more detailed "Root Cause Investigation" within 24-hours of initial notification.

In the event a fall incident occurs, an incident investigation shall be conducted to evaluate the fall protection plan for potential updates to practices, procedures or training in order to prevent reoccurrence.

Hazard Controls

After data is analyzed and the causes are known, company representatives shall try to identify controls that will prevent re-occurrence. When focusing on this part of the process, company representatives should consider implementing the following controls in order of priority:

- Engineering Controls (i.e. redesigning equipment, tools or workstations to eliminate risk).
- Administrative Controls (i.e. revising processes or procedures to limit risks).
- PPE Controls (i.e. upgrading PPE to better work around risk).

Each hazard control that is identified should be listed separately and assigned to one individual who will be solely responsible for ensuring the completion of that control. Upon being assigned the responsibility of overseeing the implementation of a control measure, that individual should be asked for a completion date which will be recorded next to their name and followed-up on accordingly.

Reporting Guidelines

All lessons learned from incidents will be communicated to all company employees by email and at company safety meetings. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

The Safety Director will notify OSHA within 8-hours of the incident if it involves a fatality. They will also notify OSHA within 24-hours of the inpatient hospitalization of one or more employees, an amputation, or a permanent eye loss.

Incidents must be reported to the client (host facility) as soon as possible, or in a timely manner (within 24 hours of incident).

Root Cause Investigation

A formal Root Cause Investigation (RCI) will be conducted when an incident occurs that results in or has the potential to result in death or severe injury (i.e. in-patient hospitalization). These investigations will be conducted by a team of 3-5 individuals and led by the Safety Director.

The focus of RCIs will be to identify all “Direct Causes” (i.e. an employee chose the wrong tool for the job) as well as all “Root Causes” (i.e. the employee wasn’t trained what the right tool was for the job). In order to identify these causes, the RCI team will start with the end result (e.g. fatality, broken ankle, etc.) and work their way backward by continually asking the question “Why?” until they discover the direct & root causes.

Once all root causes are identified the group will go back through to double check the following factors just to make sure something wasn’t overlooked:

1. Administrative Factors
 - a. Do we have a clearly written policy that identifies how to perform the task safely?
 - b. Was the employee clearly trained on this policy? Is the training frequent enough?
 - c. Is the policy enforced regularly on the jobsite? Why not?
 - d. Was the job planned out properly? Why not?
 - e. Is the employee physically able to perform the job safely? Why did we allow them to?
2. Behavioral Factors
 - a. Was the employee authorized to perform this task? Why did they proceed without it?
 - b. Did the employee shortcut safety requirements? Why?
 - c. Were they rushing, frustrated, fatigued, or being complacent? Why?
 - d. Were their eyes & mind on the task? Why not?
 - e. Was horseplay involved? Is this usually permitted?
3. Equipment Factors
 - a. Were the right tools/equipment available? Why not?
 - b. Were the right tools/equipment being used? Why not?
 - c. Were the tools/equipment being used correctly? Why not?
 - d. Were the tools/equipment defective? Why?
 - e. Were all guards in place & adjusted properly? Why not?
4. Material Factors
 - a. Is the material unsafe to handle? How? Can we change this?
 - b. Is the packaging unsafe to handle? How? Can we change this?
 - c. Is the workstation designed poorly? How? Can we change this?
5. Environmental Factors
 - a. Was poor housekeeping a factor?
 - b. Were they exposed to extreme temperature or weather conditions?
 - c. Was the noise level excessive?
 - d. Were they exposed to hazardous substances?
 - e. Were they working in a congested area?
 - f. Was the lighting poor?

RCI results will be documented and shared with executive management. If a fatality occurred, then all documentation and written communication will be funneled through legal counsel. Results may be shared with other employees at a later date, but only as instructed by counsel.

Training Requirements

All employees will be educated on the elements of this policy during Safety Orientation, including: the incident reporting procedures, investigation process, and individual responsibilities.

The Safety Director, Safety Specialists, SQCs and all Superintendents will be trained on the appropriate procedures to take when responding to an incident, how to properly conduct an Incident Investigation, and all documentation involved. This training session will be documented.

Recordkeeping

Purpose

To ensure compliance with the OSHA's recordkeeping requirements found in 29 CFR 1904, as well as to collect incident statistics for future analysis.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

Safety Director/Safety Specialist

Classify all injuries as "Recordable" or "Non-Recordable" according to OSHA's 29 CFR 1904 Recordkeeping standard.

Notify OSHA within 8-hours of a fatality, and within 24-hours of an inpatient hospitalization of one or more employees, an amputation, or a permanent eye loss.

Safety Program Manager

Record all "Recordable" injuries on the OSHA 301 Form & OSHA 300 Log within 7 calendar days from the event.

Prepare, obtain signatures & post the OSHA 300A Summary form in a conspicuous location at each office from February 1 through April 30 of each year.

Foremen

Notify the Safety Director/Specialist immediately whenever a work-related injury occurs (regardless of the severity) and completes a *First Report of Injury*, which is sent in an automated email to the appropriate departments and personnel.

Procedures

Reporting Requirements

Employees must notify their Foremen immediately upon experiencing a work-related injury or illness (regardless of severity).

Foremen must immediately notify the Safety Director/Specialists, Regional VP/Manager, Corporate Compliance Director (to identify DOT requirements for substance abuse testing), Corporate Risk Manager, and the Corporate Communication Director (if the media is involved), upon being informed of a work-related injury or illness that happens on their crew (regardless of severity).

Any work-related fatality will be reported to OSHA by the Safety Director within 8-hours of the occurrence. Any work-related injury that involves an inpatient hospitalization of one or more employees, an amputation, or a permanent eye loss will be reported to OSHA by the Safety Director within 24-hours of the occurrence.

Completing Documentation

Foremen will complete the *First Report of Injury* form (located on the Miller Pipeline Hub) each time a work-related injury occurs (regardless of the severity) and forward to the Safety Director.

The Safety Director will classify all injuries as “Recordable” or “Non-Recordable” according to OSHA’s 29 CFR 1904 recordkeeping standard. They will then complete an OSHA 301 Form for all “Recordable” injuries and add the incident to the OSHA 300 Log within 7 calendar days of the event.

The OSHA 300A Summary form will be totaled each year by the Safety Director and be reviewed and signed by the highest-ranking management official at the company.

Classifying Recordable Injuries

In order for an injury to be classified as “OSHA Recordable” it must involve a covered employee and the injury must be work-related. If both of these criteria are not met, then the injury is not recordable. Here is a brief description for each of these criteria:

A **covered employee** is any employee on payroll (salary, hourly, seasonal) or someone not on payroll but is under the day-to-day supervision of the company. In other words, the company supervises the details, means, methods, and processes by which the work is to be accomplished (including leased employees). Please note that subcontract employees do not fall into this category.

Injuries are considered **work-related** when an employee was more likely than not injured or became ill due to an event or exposure that occurred while they were performing work related activities, or were present as a condition of their employment.

In addition to meeting both of the previous criteria, an incident must also meet one (1) of the following triggers in order to be classified as “OSHA Recordable”:

The employee **lost consciousness** for any amount of time due to the event.

Medical treatment beyond first-aid was issued to the employee. OSHA defines “first-aid” as any one of the following:

- Examinations for observation or consultation.
- Diagnostic procedures (e.g. x-ray, blood test, dilating eye drops, etc.).
- Medication that is non-prescription type and non-prescription strength.
- Cleaning, flushing or soaking a wound.
- Wound coverings (e.g. bandages, gauze pads, butterfly bandages, steri-strips).
- Tetanus shot.
- Hot or cold therapy.
- Non-rigid support (i.e. wraps).
- Temporary immobilization devices during emergency transport (e.g. splints, neck braces, back boards, etc).
- Drilling a nail to relieve pressure.
- Eye covers or patches.
- Removing foreign bodies from the eye by simple means (e.g. swab, irrigation).
- Removing foreign bodies from the skin by simple means (e.g. swab, irrigation, tweezers).
- Finger guards.
- Massages (excluding physical or chiropractic therapy).
- Drinking fluids to relieve heat stress.
- Oxygen for precautionary reasons.

Classifying Recordable Injuries (*continued...*)

The employer or physician issues a **work restriction** that disallows the injured or ill employee from performing one or more of their “routine job functions” (any job function performed at least once a week on average).

The employer or physician issues a **job transfer** that disallows the injured or ill employee from performing their standard job assignment.

The employee experiences **lost workdays** because the employer or physician prevents them from working.

The injury is of a **significant nature** (i.e. fractured/broken bone, punctured eardrum, chronic irreversible disease, etc.).

The incident involved **exposure to blood** or other infectious materials due to a cut or puncture from a sharp (i.e. a needle stick incident).

The employee has been **medically removed** from the work environment due to an overexposure to a hazardous substance (e.g. cadmium, benzene, lead, etc) or because of another OSHA standard requiring medical removal.

The **employee’s hearing** test reveals that a “Standard Threshold Shift” has occurred in one or both ears (hearing loss of 10 decibels or more at 2000 – 3000 – 4000 hertz), and the hearing level in the affected ear is 25 decibels or more above audiometric zero.

The employee has developed **tuberculosis** after being occupationally exposed to someone with a known case of active tuberculosis.

Recording Recordable Injuries

An injury or illness is to be considered a new case if the employee has not experienced a recordable injury/illness of that type or to that body part in the past, or if the employee has experienced the same type of injury/illness to the same body part in the past, but has recovered completely and symptoms have re-occurred.

If a single incident involves recordable injuries or illness to multiple employees (e.g. an explosion), each individual employee must be recorded separately.

If one employee was injured and has sustained multiple types of injuries/illnesses, then the most severe injury or illness must be used when recording and classifying the case.

All “OSHA Recordable” injuries and illnesses must be recorded on an OSHA 301 and 300 form within 7 calendar days from the injury occurring or the illness being diagnosed.

Any injuries that involve an intimate body part, the reproductive system, sexual assault, mental illness, HIV, hepatitis, tuberculosis, contaminated sharps, or otherwise requested by the employee must be classified as a “Privacy Concern Case”, meaning all information that could allow others to diagnose the affected employee must be withheld from OSHA documentation.

Calculating Day Counts

When counting lost or restricted days for injuries the day count should start the day after the employee is put off work. When counting lost or restricted days for illnesses the day count should start the day of diagnosis.

When counting lost or restricted days calendar days should be used (including all weekends, holidays, or other days the employee would not have normally worked).

If partial days are lost or restricted, they are to be counted as full days.

The employer should stop counting lost days once 180 is reached, and they should also stop counting restricted days once 180 is reached (i.e. not 180 total combined days, but 180 lost days and 180 restricted days).

Maintaining Documentation

OSHA 301, 300, 300A forms, and privacy case list (if one exists) will be maintained for 5-years.

All employee medical records will be maintained for 30-years after an employee's termination.

Providing Documentation

Medical records will be made available at no cost to injured/ill employees and any approved designated representative of the employee upon request (within 15 working days). Personal identifiers will be removed from record copy before access is granted.

If Miller Pipeline ceases to do business, we shall transfer all records subject to this section to the successor employer. If Miller Pipeline ceases to do business and there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, we shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of Miller Pipeline.

Posting Requirements

An OSHA poster advising employees of the OSH Act's provisions will be posted in a conspicuous location on all job sites and in the main office.

OSHA citations will be posted near each location of alleged violation or in a conspicuous location for at least 3-days or until the hazard is abated (whichever is longer).

The OSHA 300A Summary will be totaled signed & posted in a conspicuous location(s) where all employees have access to it from February 1 through April 30 of each year. The company will also upload the OSHA 300A to OSHA's Injury Tracking Application (ITA) website by March 2nd if they had more than 20 employees at any one time the previous calendar year.

Training Requirements

All employees will be educated of their right to obtain copies of their medical records during Safety Orientation, and annually thereafter.

Trend Control Plan

Purpose

To identify trends that are resulting in or have the potential to result in incidents, and to establish a systematic approach for controlling those trends.

Scope

This section applies to all company employees.

Responsibilities

Safety Director/Safety Specialist

Conduct a comprehensive trend analysis annually to identify potential areas for improvement.

Procedures

Identifying Trends

All safety information will be kept in a database so the data can be sorted for trends and a comprehensive trend analysis will be conducted monthly and quarterly with the assistance of the Corporate Performance Analyst. An annual analysis will also be conducted by the Safety Director. This analysis will involve reviewing safety inspection results and disciplinary actions to identify leading areas of non-compliance, and reviewing all near-miss and actual injuries (including first-aid cases) to identify leading causes of injury.

Some of the trends that will be looked at include: employee name, length of employment, job title, age, supervisor name, type of incident & body part involved (if an incident occurred), task being performed, month, day of week, time of day, location, and policy violated.

Detailed reports will be established to capture the results of each analysis. This information will then be shared with all levels of employees, and various programs will be put in place to control the trends (e.g. equipment modifications, training upgrades, etc.).

Controlling Trends

The company's leading causes of injury and non-compliance will be communicated to all employees.

Precautions for preventing the trends will be covered thoroughly at our monthly Safety Meetings. This may be done with presentations, videos, or other learning tools.

SQCs, Superintendents & Safety Staff will be encouraged to look for and site trending items while conducting Jobsite Safety Observations. The Safety Director will review Safety Inspection Reports, encourage those who are looking for these items regularly, and correct those who are not.

Training Requirements

There are no training requirements related to this program.

Substance Abuse

(Will be supplied separately)

Subcontractor Management Plan

Purpose

Make sure that all tasks and projects performed by subcontractors on behalf of Miller Pipeline are safe, compliant, and without incident.

Scope

This section applies to all subcontractors of Miller Pipeline.

Responsibilities

Vice President of Environmental, Health, and Safety

Analyze all detailed reviews of subcontractors that do not meet the minimum criteria of this plan in order to determine if they are conditionally approved to perform subcontract work for Miller Pipeline.

Safety Director/Safety Specialist

Conduct basic and detailed reviews of all subcontractors according to this plan in order to determine if they are approved to perform subcontract work for Miller Pipeline.

Procedures

Prequalification Process

All companies interested in performing subcontract work for Miller Pipeline must first complete the *Subcontractor Prequalification Survey* and send it to the Safety Director/Safety Specialist for review. Companies that do not complete this survey will not be permitted to perform subcontract work for Miller Pipeline.

The Safety Director/Safety Specialist will review each submitted survey to determine if it meets minimum criteria. Companies that meet these criteria will be put on a list of approved subcontractors.

This list will be shared with all levels of management for them to reference when seeking potential subcontractors to use for various projects. Our minimum criteria will be as follows:

- No fatalities within the last 5-years.
- The current Experience Modification Rate (EMR) is less than 1.00.
- The current Recordable Incident Rate (RIR) is less than the average rate for their NAICS.
- The current Lost Time Incident Rate (LTIR) is less than the average rate for their NAICS.
- No "Willful" or "Repeat" OSHA citations within the last 5-years.

If a Miller Pipeline Manager wants to use a subcontractor who does not meet the minimum criteria of this program, they can request the Safety Director/Safety Specialist to conduct a more detailed review of the subcontractor's safety efforts.

Detailed reviews of a subcontractor's safety efforts will involve the request and review of specific detail on injuries and citations, employee training records, and a list of business references. Please note that subcontractors who will be performing locates and/or excavation activities in certain states must be Damage Prevention Institute (DPI) Accredited for approval, see the *Damage Prevention Institute (DPI) Standard Required for all Subcontractors Form* (located in the Forms Section).

If the information reviewed is deemed acceptable by the Safety Director/Safety Specialist they will present their findings to the Miller Pipeline Vice President of Environmental, Health, and Safety for review and possible "conditional approval". If the Vice President of Environmental, Health, and Safety decides to conditionally approve a subcontractor they will sign the *Subcontractor Prequalification Survey* and the Safety Director/Safety Specialist will add them to the list of approved subcontractors but label them as 'conditionally approved'.

Conditionally approved subcontractors will be required to take additional safety precautions while performing work on Miller Pipeline jobsites. These additional precautions may include: submitting a "Project Specific Safety Plan", performing daily job hazard analysis, conducting weekly jobsite inspections, and *possibly* having a credentialed safety professional onsite during the project.

Any company that does not meet the minimum criteria and does not receive a signature of approval by the Vice President of Environmental, Health, and Safety may not perform subcontract work for Miller Pipeline.

All subcontractors will be required to update and resubmit the *Subcontractor Prequalification Survey* annually in order to remain on our approved subcontractor list.

All subcontract documents and agreements between Miller Pipeline and our subcontractors will contain provisions regarding safety, including those listed in this policy.

Subcontractor Management

Companies that perform subcontract work for Miller Pipeline must comply with all federal, state & local laws that govern employee safety, including OSHA regulations. They must also follow all safety requirements established by Miller Pipeline for our employees. In addition, all subcontractors must comply with the following requirements whenever working for Miller Pipeline:

- One individual must be designated as being responsible for overseeing the complete implementation of the subcontractor's written safety plan company-wide.
- One individual must be designated on each jobsite as being responsible for the direct implementation of the subcontractor's written safety plan on that project.
- All subcontractor written safety plans & SDS for each chemical used must be accessible on each jobsite.
- Each contract employee must be trained in the work practices necessary to perform his/her job.
- Our Safety Director/Safety Specialist must be notified of any injury, vehicle accident, or near-miss incident on a Miller Pipeline jobsite within 8-hours of occurrence.

All subcontractors will be included in pre-construction meetings, orientation sessions, and regular construction meetings. At the conclusion of each project a post-job safety review may be held to discuss how things went and opportunities for future improvements.



MILLER PIPELINE

AN **ARTERA** COMPANY

Health & Safety Program

REFERENCE SECTION

Abrasive Blasting

Purpose

This plan has been developed to educate abrasive blasters on how to do abrasive blasting safely, in conjunction with Miller Pipeline's Abrasive Blasting Training. By providing employees with information regarding the hazards of abrasive blasting, possible control measures, and the knowledge necessary to implement protective measures, this plan will aid in the safe performance of abrasive blasting operations and comply with all regulatory requirements.

Scope

This section applies to those employees who perform abrasive blasting, employees who assist in abrasive blasting operations, and foremen/supervisors over abrasive blasting operations.

Responsibilities

Safety Director

Evaluate this policy annually or when new hazards, or customer/regulatory requirements arise.

Ensure all affected employees receive initial and ongoing training.

Foreman

Assess materials being blasted for potential hazards.

Subcontractors

Adhere to the contents of this plan, manufacturer requirements and federal/state/local laws that apply to abrasive blasting operations.

Procedures

Hazard Evaluation

Before any abrasive blasting takes place, each jobsite should be assessed by the Supervisor for potential risks. The primary hazards to consider are: 1.the material being blasted, and 2.the grit used to blast the material.

Common hazards associated with abrasive blasting include:

- Potential exposure to silica (see Miller Pipeline's Silica Exposure Control Program for additional information)
- Potential exposure to other toxins/chemicals in surface being blasted
- Potential exposure to other toxins/chemicals in blasting media
- Potential Carbon Monoxide exposure from vehicle/equipment exhaust
- Potential exposure to asbestos
- Potential exposure to fumes

Before blasting any materials, the material must be observed and any coatings assessed for potential hazards, including but not limited to coal tar wrap and lead-based paint. If the material or coatings are not part of the planned Scope of Work and are identified as potentially hazardous, the Safety

Department should be contacted prior to conducting the work. The Safety Department will advise on additional precautions or safety measures to be taken in order for work to commence.

Engineering Controls

Only non-combustible abrasives shall be used for blasting. Miller Pipeline primarily uses either "Black Beauty" products or TruAbrasives crushed glass blasting grit. These products are also free of/contain trace amounts of crystalline silica. Other types of grit are permitted for use, but only if they do not contain more than 1% crystalline silica, as the free silica portion of the dust presents a respiratory health hazard. Safety Data Sheets should be referenced before blasting operations commence. Copies of SDS's are available on demand through Verisk 3E (800-451-8346).

Isolation

Although it is not normally feasible to completely enclose and ventilate abrasive blasting operations in non-facility settings and field operations, it is possible to isolate most blasting operations to help reduce the potential for exposure to lead or other harmful substances. Isolation, in this instance, consists of keeping employees not involved in the blasting operations as far away as possible from the work area. By placing the employees at a greater distance from the source of lead exposure, their exposures will be reduced. However, isolation does not preclude the need to protect these workers with suitable respirators or personal protective equipment.

Air Monitoring

Air for abrasive- blasting respirators must be free of harmful quantities of dusts, mists, or noxious gases, and must meet the requirements for supplied-air quality and use specified in 29 CFR 1910.134(i). This is also referred to as "Grade D" breathing air. Respirator hoses must be checked for proper connection to the appropriate source line before use. Respirators do not protect against carbon monoxide, or other dangerous gases. Air supply must be continuously monitored via an alarm inside the blast hood, or through a "suitcase" style filtration/monitoring system. When utilizing these "suitcase" style units, compressors and ambient air pumps must be located away from vehicle and equipment exhaust when utilizing these "suitcase" style units to avoid potential contamination.

Work In Hazardous Atmospheres

If concentrations of a potentially hazardous material that is being blasted are detected above the limits specified in 1926.55(a), the work will not be performed by Miller Pipeline employees.

Personal Hygiene

The following personal hygiene practices are important elements of any program for protecting workers from exposure to airborne contaminants during abrasive blasting operations:

- Wash hands and face before eating, drinking, or smoking.
- Do not eat, drink, or use tobacco products in the blasting area.
- Park their cars where they will not be contaminated with silica and other substances.

Personal Protective Equipment

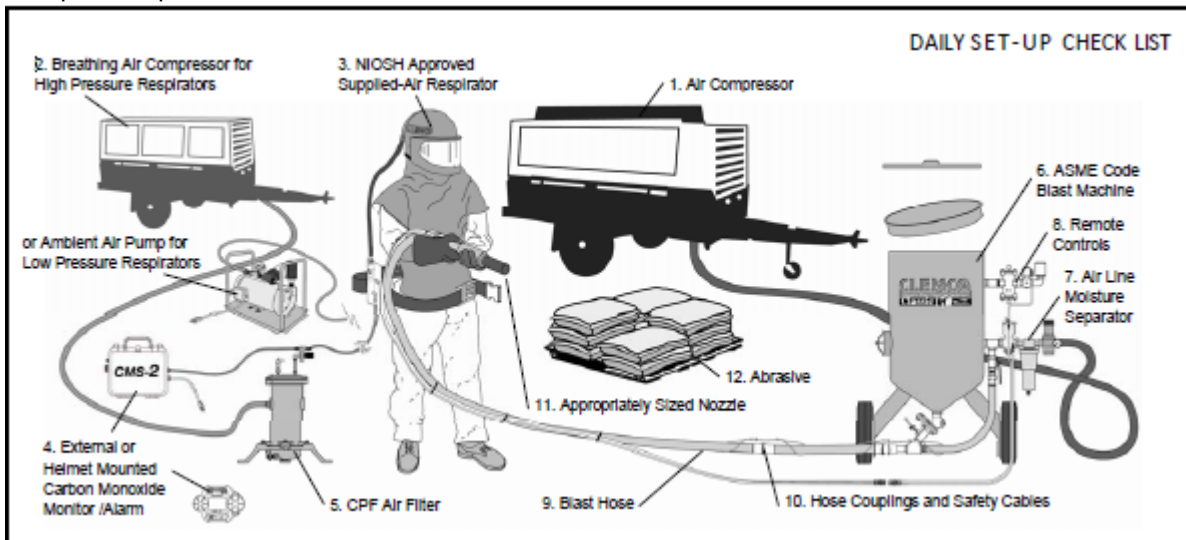
Employees performing blasting operations will be required to wear eye and face protection, heavy leather or canvas gloves, heavy aprons/coveralls as, safety-toe shoes, and NIOSH-approved respiratory protection. All operators are required to wear a full-face abrasive blasting respirator/auxiliary hood that covers the head, neck, and shoulders, along with all other PPE.

Other workers involved in blasting operations, and all others site personnel exposed to/in vicinity of blasting operations will also be required to wear appropriate NIOSH-approved respiratory protection,

based on the site-specific hazards identified during the hazard assessment. All exposed skin must also be covered. The Miller Pipeline “Respiratory Protection Program” and “Hearing Conservation Plan” should also be referred to and reviewed prior to conducting this work.

All protective equipment will be provided by Miller Pipeline at no cost to employees. In order to assure the continued reliability of protective equipment, it must be inspected each day before use, kept clean, and disposed of as necessary.

Sample Setup



General Safety Precautions

- Hoses must be inspected before use each day by squeezing and bending them to identify worn areas. If a hose is determined as being excessively worn or damaged, the hose must be taken out of service and replaced.
- Hoses shall have whip checks and clips/wires properly installed to prevent accidental decoupling.
- When pouring blasting grit into the hopper care shall be taken to make sure no loose paper or debris enters the hopper that could clog the nozzle.
- The blast nozzle control (deadman) switch shall be located near the nozzle in a position where the operator’s hands will be when using the device.
- When released, the control switch shall immediately stop the flow of material.
- The control switch shall be guarded, to prevent inadvertent activation.
- The unit shall be shut off when not in use and the nozzle should be placed on a support.
- Nozzles should NEVER be pointed at any body part.
- Employees must ensure that all pressure is fully released from the hopper before uncoupling hoses.
- This can be done by listening for the internal plunger to drop and dispensing any built-up pressure
- When abrasive blasting for extended periods, a worker rotation plan shall be implemented to reduce exposure time.

Site Control

- Warning signs shall be posted if the material being blasted could potentially pose a health hazard to the public
- Any unauthorized individuals must be removed as necessary.
- Where the abrasive blasting will affect other workers, cone/rope off area to warn workers and prevent access to work area
- Only Workers equipped with the required PPE shall enter the work area
- Workers not directly involved in the abrasive blasting operation shall stay up- wind whenever possible

- Equipment and vehicles should be protected from debris projected from the work area
- Blasting grit/dust that accumulates on walking/working surfaces must be cleaned immediately to prevent slip hazards, especially on back of vacuum excavation trucks

Training Requirements

Under no circumstances may an employee perform abrasive blasting or assist in abrasive blasting until they have been educated on the contents of this plan and properly trained. This includes new employees, regardless of claimed previous experience.

Plan Evaluation and Change

This plan will be evaluated for necessary changes as new hazards associated with our abrasive blasting operations are identified, current precautions are determined as not being adequate, and customer/regulatory requirements require further actions. Upon modifying this plan, the safety department will ensure that all affected employees are educated and understand any changes to this program, and any revisions to the plan will be documented with revision date.

Bloodborne Pathogens

Purpose

Identify and control potential hazards associated with exposure to blood or other infectious materials (all body fluids will be considered potentially infectious), comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to those employees who perform emergency First Aid/CPR treatment.

Definitions

Bloodborne Pathogens: Pathogenic micro-organisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).

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

HBV: Hepatitis B virus.

HIV: Human immunodeficiency virus.

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

Universal Precautions: An approach to infection control. All human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

Responsibilities

Safety Director

Ensures training is conducted for all Foremen, and employees required to perform CPR/First Aid and who work in sewer pipes.

Coordinates all medical examinations with medical facilities.

Organizes and maintains required exposure and training documentation.

Ensure employees have access to a copy of the exposure control plan.

Foreman

Restocks Bloodborne Pathogen Kits after each use.

Uses all necessary universal precautions when performing medical treatment activities.

Assures no other employees are exposed to infectious materials.

Reports any contact to the Safety Director immediately.

Thoroughly cleans and decontaminates areas containing infectious materials.

Procedures

Exposure Control

Employees who work in sewer pipes, or perform First Aid/CPR are the **only** Miller Pipeline employees that are allowed to perform work that involve the possible exposure to infectious materials.

Hepatitis B Vaccination

Miller Pipeline offers a Hepatitis B Vaccination for any employee whose job functions include the potential hazard of exposure to infectious materials. This vaccination is only given to those who chose to receive it and will be available at no cost to the employee, even if they decide to have it in the future. Appointments will be made for employees to receive the vaccination within 10 days of initial hire. All appointments will be scheduled to take place during normal business hours. Any employee that chooses to decline the vaccination must sign the *Bloodborne Pathogens Vaccination Form* (located in the Forms Section).

Policy Maintenance

As all other sections in this Health & Safety Program, this policy will be evaluated on an annual basis by the Safety Director. Documentation and medical records involving exposure incidents, along with all *Incident Investigation Reports* will be taken into consideration when conducting this evaluation.

Universal Precautions

Employees exposed must determine the appropriate universal precautions to use prior to issuing treatment, or working in sewer pipes, in order to protect themselves from the possible risks of exposure. They are also responsible for communicating all hazards to employees when an exposure situation exists.

Employees shall avoid contact with infectious materials at all times, and exposed workers shall use protective equipment whenever contact is possible. If an employee is injured, but is able to issue First Aid treatment to himself or herself, then the First Aid responder shall instruct the individual on how to do so without coming in contact with the injured employee. If an employee is injured and the First Aid responder must make physical contact, then all universal precautions must be followed to prevent exposure.

Direct contact will not be made without the use of all recommended PPE. All recommended PPE will be located at each job site in First Aid Kits or Bloodborne Pathogen Kits. These kits will remain stocked at all times to help prevent occupational exposure. The kits will include eye goggles, a one-way resuscitation device, a gown and cap, impervious rubber gloves, red biohazard bags, and antimicrobial, antiseptic and disinfectant towelettes. PPE shall be repaired and replaced as needed to maintain its effectiveness.

Post-Exposure Incidents

Any employees who have potentially been exposed to the infectious materials, will thoroughly wash all exposed body parts with soap and hot water for at least 5 minutes immediately after the emergency responders take over. Hand cleanser in conjunction with cloth/paper towels will be located in all company vehicles or in toolboxes for use when restrooms are not available for washing purposes.

Any incident that involves potential exposure to infectious materials must be reported to the Safety Director immediately. Employees who have been exposed to body fluids will be required to visit a designated medical facility for a medical evaluation. The physician may warrant that a post-exposure treatment (booster shot) and/or a follow-up evaluation is needed. All recommendations made by the physician will be followed.

Decontamination Procedures

Areas that contain blood or any other potentially infectious body fluid will be barricaded off until the area can be cleaned and decontaminated by the Foreman. The spill should be cleaned, before returning to regular duties.

The following procedures will be used for cleaning and decontamination of body fluids:

- Personal protective equipment will be worn during decontamination.
- The contaminated area will be cleaned using the provided bleach packet.
- All infectious materials will be carefully placed in the provided red biohazard bag. However, vomit and sewage may be flushed down the drain (toilet). Paper towels used to clean up vomit or sewage can be placed in the trash. The only items that cannot be disposed of via trash, drain or toilet are the following:
 - (1) Contaminated sharps or contaminated objects that could potentially become contaminated sharps.
 - (2) Infectious biological cultures, infectious associated biologicals, and infectious agent stock.
 - (3) Pathological waste.
 - (4) Blood and blood products in liquid and semiliquid form.
 - (5) Carcasses, body parts, blood and body fluids in liquid and semiliquid form, and bedding of laboratory animals.
 - (6) Other waste that has been intermingled with infectious waste.
- Containers will be capable of closing, and labeled with the Biohazard symbol or solid red.
- Containers will be taken to a biohazard waste disposal company, such as Stericycle for proper disposal.

Recordkeeping Requirements

All documentation associated with occupational exposure incidents will be maintained for at least 30 years after the employee ends their employment with Miller Pipeline. This documentation will consist of the following:

- Employee Name and Social Security Number
- The Hepatitis B Vaccination records
- The medical examination results
- The health professional's written opinion
- All information provided to the health professional

Training records will be maintained for at least 3 years from the date it was conducted. Records must consist of the following:

- Names and job titles of attendants
- Name and qualifications of person conducting training
- Date of training
- Content of training

All documentation will be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace except as required by law.

Training Requirements

Employees will be trained in accordance to the Training and Education Section. Training shall be provided at the time of initial assignment to tasks where occupational exposure may take place, and at least annually thereafter.

Employees will be instructed not to perform medical treatment or expose themselves to possible infection during Safety Orientation.

Compressed Air and Gas

Purpose

Identify and control potential hazards associated with compressed air and gas, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline who work with compressed air and gas as part of their normal work activities.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman

Enforces the guidelines addressed in this policy.

Employee

Inspects compressed gas cylinders before using to ensure they are in a safe condition.

Procedures

Proper Usage

Visual and other inspections shall be conducted to determine that compressed gas cylinders are in a safe condition.

Employees should release unwanted pressure that is stored in the hoses by turning off the valves at the cylinder and open the torch until adequate pressure is released.

Only tools provided by the supplier should be used to open and close cylinder valves.

Cylinders will be maintained in good condition with no rust, dents, or punctures. All cylinders will be labeled to indicate their contents. Gas identification should be stenciled or stamped on the cylinder or affixed with a label. Whenever practical, the marking shall be located on the shoulder of the cylinder. No compressed gas cylinder should be accepted for use that does not legibly identify its content by name.

Hoses and connections should be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.

Flammable compressed gas cylinders will not be used within 20 feet of any source of ignition.

Cylinders will be equipped with gauges that are legible and in good condition. Line pressure for acetylene must be kept at 15 pounds of pressure or less.

Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt and solvents.

When a cylinder cap cannot be removed by hand, cylinder shall be tagged "Do Not Use" and returned to the designated storage area for return to vendor.

Leaking cylinders should be moved to an isolated, well ventilated area, away from ignition sources. Soapy water should be used to detect leaks. If the leak is at the junction of the cylinder valve and cylinder, do not try to repair it. Contact the supplier and ask for response instructions.

Cylinders should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as full cylinders.

All cylinders with a water weight capacity of over 30 pounds (13.6 kg) shall be equipped with means of connecting a valve protection cap or with a collar or recess to protect the valve. Cylinders shall be kept away from radiators and other sources of heat.

Storage Considerations

All unused cylinders will be stored in the designated cylinder storage location. These locations will be labeled to remind employees to place cylinders in their assigned areas.

Storage areas for full and empty cylinders must be designated and labeled. Cylinders should be stored in definitely assigned places away from elevators, stairs, or gangways.

Stored cylinders will be properly secured in an upright position with chaining devices to prevent tipping in any direction. These devices will be drawn tight, and cylinders will only be stored one row deep to help reduce the possibility of tipping.

Empty cylinders shall have their valves closed. Valve protection caps, where cylinder is designed to accept a cap, shall always be in place, hand-tight, except when cylinders are in use or connected for use. Protective caps will be replaced on all cylinders that are not in use.

Inside of buildings, cylinders shall be stored in a well-protected, well-ventilated, dry location. Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.

Oxygen and flammable fuel gas cylinders will be placed in separate designated locations at least 20 feet away, or separated by a firewall that is 5 feet high and fire rated for at least 30 minutes.

Signs reading "NO SMOKING" will be posted in and around all storage areas.

Cylinders must be protected from damage, corrosion, sunlight and kept away from heat sources.

Cylinders will be protected from weather causing corrosion or rusting of cylinders. If a cylinder is frozen, it will be removed by pouring warm water around it to melt the ice. Hot water or striking tools will never be permitted to remove frozen cylinders.

Cylinder Handling, Moving and Transporting

Gauges/Regulators shall be removed from cylinders and the protective cap must be properly secured prior to handling, moving or transporting.

During transport, compressed gas cylinders shall be firmly secured and kept upright, and moved on a hand truck or dolly. Chains are the preferred method of securement. Cylinders should not be dragged, moved, or slid. Never lift or hoist a cylinder by the protective cap.

Cylinders will be kept out of contact with grease, acids, salt, heat, and flames.

All precautions will be taken to prevent dropping, puncturing, or striking the cylinders when handling procedures are taking place.

Training Requirements

The hazards of handling, using and storing compressed gas cylinders, as well as the precautions for avoiding those hazards must be covered with all affected employees during Safety Orientation. This will include the safe use of fuel gas.

Confined Space Entry

Purpose

Establish a process for identifying confined spaces, evaluating confined space hazards, and implementing precautions that will avoid injury or incident involved with confined space entry.

Scope

This section applies to all employees of Miller Pipeline who enter confined spaces.

Definitions

Confined Space – A space that is large enough for an employee to enter, has limited or restricted means of entry and/or exit, and is not designed for continuous employee occupancy. Some examples include: tanks, pits, boilers, elevators, HVAC ducts, lift stations, sewer systems, catch basins, manholes, baghouses, crawl spaces, and attics. Excavations, underground caissons, and diving operations are exempt.

Competent Person – One who is trained and capable of identifying existing or predictable hazards specific to confined spaces and who has the authority to eliminate or correct those hazards.

Hazardous Atmosphere - An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from permit space), injury, or acute illness.

Limited or Restricted Means of Entry/Exit – A condition that has the potential to impede an employee's movement into or out of a space (i.e. trip hazards, poor illumination, slippery floors, inclines, etc.)

Non-Permit Confined Space – A confined space that meets the definition of a "Confined Space", but does not meet the definition of a "Permit Required Confined Space". The only hazard posed is an actual or potentially hazardous atmosphere and ventilation can maintain the space.

Permit Required Confined Space – A confined space that has the potential to contain a hazardous atmosphere, engulfment hazard, configuration hazard, or another serious hazard.

Prohibited Condition – Any condition in a Permit Required Confined Space that is not allowed during entry.

Responsibilities

SQC/Regional Safety, Quality, and Compliance Coordinators

Ensures that all necessary confined space equipment is made available.

Formally inspects confined space entry operations while performing Safety Inspections.

Safety Director

Makes sure that all Confined Space Entry employees are adequately trained.

Oversees a complete evaluation of this program and all completed permits annually.

Foremen

Assumes the role of Competent Person as required by this program.

Acts as the Entry Supervisor who oversees all confined space operations.

Employees

Follow the requirements set forth in this program.

Procedures**Assessment & Classification**

A Competent Person will assess each job site to determine if any employees will be required to enter a confined space. If a confined space is identified that must be entered, the Competent Person will classify the space as "permit required".

Upon identifying a confined space that must be entered and classifying it as "Permit Required", the Competent Person shall notify the controlling contractor and all affected employees.

The controlling contractor will discuss the proposed entry operations with the host employer and gather information about the history of the space, all associated hazards, and any necessary precautions. This information will then be communicated back to the entering employer before entry.

Coordinate entry operations for multi employers so that employees of one employer do not endanger the employees of any other employer.

Permit Required Confined Spaces shall be labeled and access to these spaces shall be locked or otherwise controlled to prevent unauthorized entry.

Employees can request a space be re-evaluated at any time.

Confined Space Entry Team Responsibilities

There are three members of each confined space entry team. These members include the Entry Supervisor, Attendant and Authorized Entrant. These employees will have the following responsibilities:

SUPERVISOR: Oversees all activities involved with entering a confined space, including: communicating with the host and controlling contractor, coordinating and verifying rescue services, signing and cancelling permits, and removing unauthorized entrants from spaces. This responsibility can be passed to another trained individual during an entry. The Entry Supervisor is typically the site Foreman.

ATTENDANT: Must be on duty outside the entrance of a confined space throughout entry, avoids any activities that could divert their attention away from the entry operations, prevents unauthorized entry, maintains constant communication with all entrants, monitors entrants for symptoms of distress, monitors inside and outside the space for hazardous situations, and orders evacuation if the alarm sounds, entrants display signs of distress, or a prohibited condition occurs.

ENTRANT: Wears all required PPE, follows all safety precautions required by the permit, monitors their body for symptoms of distress, and immediately exits the space if an alarm sounds, symptoms are noticed, or the Attendant orders evacuation.

Preparing for Entry

Pre-Entry Meetings

All personnel who are involved with a confined space entry shall hold a meeting prior to beginning work in order to plan the entry from start to finish. If employees from another company plan to enter the space simultaneously and/or a third-party is expected to provide rescue services, these entities shall be present at these meetings as well.

The content of Pre-Entry Meetings shall include: the type of work to be done, the people involved, hazards that exist within the space, hazards that will be created within the space, methods for isolated or controlling all hazards, equipment needed, required PPE, means of communication, any prohibited conditions associated with the confined space, the permitting process, and rescue procedures. The meeting should also include a reminder that a call must be made to the SQC before entry and after entry is completed and permit cancelled.

Hazard Education

Prior to entering a confined space that could involve potential exposure to an unknown hazardous substance, the Entry Supervisor shall research that substance to understand all associated hazards, routes of entry, and necessary precautions. This information will likely be gathered by studying a Safety Data Sheet. All of this information must be shared with the rest of the employees prior to entry.

Entry Procedures

Securing the Area

The area will be secured using verbal warning to all employees in the area that will be affected by the entry, as well as posted warning signs, barricades/cone toppers, and/or danger tape.

The attendant will be responsible for standing by the entrance to the space and ensuring that unauthorized employees do not enter.

The Entry Supervisor shall make sure the entrance to the space is closed and secured so that unauthorized entry cannot occur after the entry has been terminated.

The Permitting Process

Entry Supervisors will be responsible for making sure a *Confined Space Entry Permit* (like the one located in the Forms Section) is completed, authorized and posted by the entrance before entry, except in residential crawlspaces or attics.

NOTES: Permits other than the one located in the Forms Section may be used if issued by the host company. Any Miller Pipeline employee who has been trained in Confined Space Entry may complete a permit, but only the Entry Supervisor can authorize or cancel them (which is verified by signature).

The entry supervisor shall be responsible for securing the permit, signing-off when the actions listed below have been confirmed, and then canceling the permit upon completion of the work, abandoning the jobsite, or finding the permit did not address all necessary hazards.

- A. Before entry is authorized, the entry supervisor shall document the completion of measures to evaluate permit space conditions. Also contact the Regional Safety, Quality, & Compliance Coordinator.

- B. Provide authorized attendant for duration of entry operation.
- C. Designate all persons who have active roles (attendants, entrants, and entry supervisors), identify duties, and train as required.
- D. Review and follow procedures for in-house rescue service.
- E. Location and description of the work to be done.
- F. Hazards that may be encountered.
- G. Complete isolation checklist.
 - 1. Blanking and/or disconnecting.
 - 2. Electrical lockout.
 - 3. Mechanical lockout.
- H. Special clothing and equipment.
 - 1. Personal protective equipment and clothing.
 - 2. Miller Intruder (including man winch/material winch) Safety harness and/or lines where required.
 - 3. Approved electrical equipment.
- I. Atmospheric test readings in accordance to Standards on Entry Permit.
 - 1. Oxygen level (O₂, CO, H₂S, Natural Gas, %LEL).
 - 2. Flammability and/or explosive levels.
 - 3. Toxic substance levels (if applicable).
- J. Atmospheric monitoring while work is performed (if determined by the qualified person).
- K. Personnel training and complete understanding of the possible hazards.
- L. Standby person(s) (attendant(s)).
- M. Emergency procedures and location of first aid equipment.
- N. Rescue drill completed as required.
- O. Coordinating entry operations for multi employer's so that employees of one employer do not endanger the employees of any other employer.
- P. Special permits.

Job-duration permits for one week or the duration of the job provided that:

- a. No engulfment potential.
- b. Atmospheric testing and inspection at the beginning of the shift and periodically.
- c. No unauthorized process which could introduce or create a hazard.
- d. New processes or procedures require a new or special purpose permit.
- e. Permit withdrawn if conditions change.
- f. If there is a reason to believe that the measures taken under the permit space program may not protect employees, the Safety Director will revise the program to correct deficiencies found to exist before subsequent entries are authorized.

The Entry Supervisor may temporarily suspend a permit if a prohibited condition arises within a confined space that doesn't affect the configuration of the space.

Permits must be cancelled whenever the task being performed in the space has been completed, or whenever the space is left unattended (whichever comes first).

All cancelled permits shall be kept for at least 1 year.

Manhole Safety/Entry Procedure

These procedures are meant to safeguard employees but are useless without employees and supervisors support, cooperation, and adherence to procedure.

A. The following procedure is to be strictly adhered to when opening and/or entering a manhole is necessary:

1. Vehicle used is to be positioned such that the maximum personnel protection from oncoming traffic is achieved.
2. Cones/Barriers/Cone Toppers and necessary traffic control signs are to be set in place prior to starting work.
3. Before manhole is uncovered, a combustible/atmosphere check will be made to check for possible explosive/hazardous condition created by pick making spark igniting combustible. Each crew will daily check, test, and take to all job sites an atmosphere monitor.
4. Use appropriate equipment to remove manhole cover, avoiding if possible placing fingers in position to be pinched from lifting of cover. Offset cover with pick and slide aside.
5. After work is completed but before replacing cover, check general condition of manhole, spray off or sweep manhole ring, then replace cover following #4 above.

B. Entry into a manhole is prohibited unless the following procedure is strictly adhered to:

1. Entry Supervisor will follow proper procedure for issuing confined-space entry permit according to Miller's safety regulations.
2. Check air envelope at all depth levels (not just the top) for oxygen, combustible, hydrogen sulfide, and CO prior to entry. Supervisor will have necessary testing equipment on his vehicle calibrated and ready to use.
3. In all cases where manhole entry is needed, ventilate the manhole. Make sure vehicle exhaust is not liable to enter manhole.
4. Man-lift "Miller Intruder"/Man winch or Material Winch and the appropriate safety lines and harness will be available on site. At each manhole site, the necessary safety equipment shall be available in the event of an emergency. This will include, but not be limited to:
 - Safety harness with rope and means of rescue.
 - 5, 10, or 15 minute rescue airpack-SCBA.
 - 20# Fire extinguisher.
 - First aid kit.In case of emergency, call 911 or paramedics and use Miller trained rescue personnel to rescue from confined space to street level for paramedics to take over at that point.
5. Equipment to be used will include "rock climbing" hard hat, boots, gloves, rain gear, safety glasses and/or goggles, and any other required PPE to affect safe rescue.
6. Miller confined-space personnel shall not enter space unless it is or can be ventilated to safe atmosphere, i.e. 19.5-23.5% oxygen; less than 10% LEL; less than 10 ppm H₂S; less than 35 ppm CO; and less than PEL (permissible exposure limit) of any other toxic.

C. Sewer Manhole Entry.

1. Sewer entry differs in three vital respects from other permit entries: first, there rarely exists any way to completely isolate the space (a section of a continuous systems) to be entered; second, because isolation is not complete, the atmosphere may suddenly and unpredictably become lethally hazardous (toxic, flammable, or explosive) from causes beyond the control of the entrant or employer; and third, experienced sewer workers are especially knowledgeable in entry and work in their permit spaces because of their frequent entries. Unlike other employments where permit space entry is a rare and exceptional event, sewer workers' usual work environment is a permit space.

Before entering any sewer manhole, it should be cleared, and the air tested with a properly calibrated 4-gas monitor. The amount of oxygen in the confined space should not be less than 19.5% or more than 23.5%. If the gas or toxic alarm sounds on the monitor, do not enter the manhole. Ventilate to try and achieve safe atmosphere.

2. Even though sewer entry differs from standard entry, all of the above safety/entry procedures are to be utilized and strictly adhered to.

Controlling Hazards

Work is not permitted in a confined space that has a hazardous atmosphere unless all Entrants are wearing the proper level of PPE (e.g. supplied air respirators, SCBA, etc.) Sewer entry will also require protective suits, rubber gloves, and boots for all entrants.

Work is not permitted in a confined space that has an atmosphere above 10% of the Lower Explosive Limit (LEL) of any substance, unless inert gas is used to lower the oxygen level and prevent ignition. If this practice is utilized, then a supplied air or SCBA respirator shall be worn.

Lockout-Tagout must be practiced whenever possible to isolate physical hazards within a confined space. Some physical hazards that may be present include: moving parts, electricity, steam, pneumatic pressure, water/fluid, and chemicals. All elements of the Lockout Tagout Program (located in the Reference Section) shall be followed.

Whenever working in a confined space that involves an engulfment hazard that cannot be isolated during entry, an early warning system must be used that will warn the Entrants and give them adequate time to evacuate the space prior to engulfment.

When working in a confined space that involves exposure to combustible dust the space shall be adequately cleaned by means of water or vacuum in order to control the dust accumulation. The use of compressed air to clean combustible dust is strictly prohibited.

Precautions shall be taken to minimize any risk associated with removing the cover to the confined space. Some of these precautions may include: relieving pressure, flushing or purging the space, and possibly testing around the cover for traces of flammable gas before using metal tools on other metal components that could spark.

A safe way of entering and existing the space shall be utilized. This may require the need to avoid using older brittle stairs/ladders.

All tools and equipment brought into the space must be of safe construction. This may include the need to use brass tools and intrinsically safe lights, while avoiding internal combustion engines that could create carbon monoxide.

An effective means of communication shall be used that allowed the Attendant to clearly communicate with all Entrants (i.e. voice, radio, rope tug, etc.). If more than one confined space is

to be monitored by a single attendant, there must be a plan in place to enable the attendant to respond to emergencies in one or more permit spaces that he/she is monitoring without distraction from all responsibilities.

Welding Precautions

When welding or cutting is being performed in any confined spaces the gas cylinders and welding machines shall be left on the outside. Before operations are started, heavy portable equipment mounted on wheels shall be securely blocked to prevent accidental movement.

When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur, and the machine disconnected from the power source.

In order to eliminate the possibility of gas escaping through leaks of improperly closed valves, when gas welding or cutting, the torch valves shall be closed and the fuel-gas and oxygen supply to the torch positively shut off at some point outside the confined area whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. Where practicable the torch and hose shall also be removed from the confined space.

After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

Ventilation

Ventilation is a prerequisite to work in confined spaces.

Attics/Basements/Crawlspaces

Attics, basements, and crawlspaces should be evaluated by a Competent Person to determine what requirements of 1926 Subpart AA apply, as not all these spaces trigger many of the requirements necessary for other confined spaces, including continuous ventilation. However, attics, basements, and crawlspaces may also contain various hazards that must be addressed before entry. Do not assume these spaces are safe to enter until proven so.

Local exhaust or general ventilating systems shall be provided and arranged to keep the amount of toxic fumes, gases, or dusts below the maximum allowable concentration. Special consideration must be given to prevent the possible evolution of hazardous fumes, gases, or dust according to the metals involved. Any welding, cutting or burning of lead-based metals, zinc, cadmium, mercury, beryllium, or exotic metals or paints shall have proper ventilation and/or respiratory protection.

Continuous forced air ventilation shall be used in all confined spaces other than attics, basements or crawlspaces that do not apply based on the Competent person's evaluation.

The Entry Supervisor must identify the proper type of ventilation to use by evaluating the size of the space, the potential hazards inside the space, and the power of the ventilator (measured in CFM). If ventilation is to be used in a potentially flammable atmosphere, the equipment shall be of metal construction and be properly grounded.

The intake of the ventilation device shall be positioned in an area that is free from possible air contaminants, such as Carbon Monoxide from running equipment.

Atmospheric Monitoring

Atmospheric monitoring shall be performed continuously, unless the Competent Person can demonstrate that periodic monitoring is sufficient (i.e. the probability for a hazardous atmosphere

to develop is low, the severity if it were to occur is low, and the history of the space is safe). Continuous monitoring is required when engulfment hazards exist.

If continuous monitoring is not used, then periodic monitoring must be used. The Competent Person will establish the frequency of this monitoring depending on the circumstances, but testing shall not exceed more than 15-minute increments.

At a minimum, four gas monitors shall be used to monitor confined spaces. These monitors will be able to test oxygen, Carbon Monoxide, Hydrogen Sulfide, and the Lower Explosive Limit (LEL) of several substances. If another substance has the potential to be present inside the space, then additional monitors and/or sensors must be used that are capable of detecting the substance.

All atmospheric monitoring equipment must be in good physical condition, functioning properly, bump tested daily, and calibrated as recommended by the manufacturer. The gas used for bump tests and calibrations cannot be expired.

Vertical spaces shall be tested at 4' increments (and 2' from the top and bottom) in order to detect different gasses that may be positioned within the space at different levels.

Atmospheric testing should be able to be done outside of the space, but in the rare event that an employee has to enter a space in order to conduct testing, they must do so under the full requirements of this program and wear adequate respiratory protection.

Personnel using atmospheric monitors will be trained on the use and limitations of the monitor.

Transfer of Authority

The responsibility of any confined space team member may be transferred from one individual to another (including the Supervisor). If such a transfer is necessary, then all entry employees must be notified prior to the transfer and the change must be documented on the Entry Permit.

Rescue Procedures

Selecting the Type of Rescue

Prior to entering a confined space and during the Pre-Entry Meeting (as required by this program) the Entry Supervisor will establish specific rescue procedures for each space to be entered.

Whenever possible, a non-entry rescue will be utilized by requiring all employees within the space to wear a full body harness and lifeline that must remain attached at all times to a personnel winch that is located outside of the space.

NOTES: The use of multiple retrieval lines within the same space is prohibited if they are likely to become entangled. Also, the use of a rescue rope attached to an Entrant's harness is permissible in vertical spaces less than 5' deep.

If Entrants must enter and work in a horizontal space or if the space is otherwise configured in a way that makes the use of a personnel winch ineffective, then wristlets or anklets shall be used.

The only time that an entry rescue is allowed is when the use of a retrieval device (i.e. winch, wristlets, ankles, etc.) is not feasible or when it increases the risk associated with rescue.

Basic Rescue Requirements

When non-entry rescue is the primary form of rescue the Entry Supervisor must identify a backup plan in case the procedure fails (i.e. dialing 911, in-house rescue teams, relying on a third-party rescue team, etc.)

When entry rescue is the primary form of rescue, all rescue employees must be adequately trained to perform the rescue, certified in First Aid/CPR/AED, and equipped with the necessary PPE.

Whenever entering a confined space that could involve an atmosphere that is Immediately Dangerous to Life or Health (IDLH), the individuals responsible for performing the primary rescue must be present onsite throughout entry.

If the primary rescue plan becomes hindered in any way (i.e. equipment is malfunctioning, the individual responsible for rescue must leave the site, the third-party rescue service becomes unavailable, etc.), then the Entry Supervisor and/or Attendant must order a complete evacuation of the space immediately until the issue has been resolved.

In-House Rescue Teams

As indicated in the Miller program, Miller Pipeline Corporation has chosen to utilize our own people and in-house rescue teams to accomplish a rescue within the confined space (pipeline). This is accomplished typically with the Miller designed and manufactured confined-space emergency rescue cart. This cart is designed to transport a potential downed victim from within the pipe to the outside of the access opening. It has grommets that allow a rope to be tied on and at least two Miller confined-space entrant and rescue personnel can take this cart into the pipe. With one person working from the head and shoulders and the other person working from the feet of the victim, pull the victim onto this Miller emergency rescue cart and then notify the outside standby attendants to pull the rope and transport the victim to the outside of the pipeline.

This method of rescue has been utilized by Miller for 20+ years and has proven very effective in all sizes of pipe, including small diameter pipe. In some situations, we may substitute with the SKED[®] SK-200-OR Basic Rescue System, which is a heavy-duty, light weight plastic stretcher that can be used in conjunction with the Miller emergency rescue cart or can be used independently depending on the nature of the rescue.

As indicated in the Miller Confined-Space program, all rescues will be practiced at least once every 12 months and practiced when deemed necessary by the Miller entry supervisor.

Third Party Rescue

If a third-party is engaged to perform an entry rescue, the Competent Person must evaluate that third-party to ensure they are adequately equipped to perform such a rescue and able to reach the victim in a time frame appropriate for the hazards involved.

Third-parties responsible for performing entry rescue shall be given access to the space so they can assess its dimensions and characteristics, and so they can practice rescue if they so desire.

Prior to entering a space that requires entry rescue from a third-party that is not present onsite, the Entry Supervisor must contact the third-party to let them know they are entering the space, ask them to remain available, and request they notify the company if they become unavailable.

Program Maintenance

The Safety Director will conduct a formal review of this program at least annually by reviewing all cancelled permits, and also whenever one of the following occurs: unauthorized entry, prohibited condition, unplanned hazard, employee complaint, incident or near-miss, modified procedure, or change in equipment.

The contents of this program will be included in the training that all confined space entry employees receive before their initial entry. However, it will also be made available to these individuals in case they want to review or reference it.

Training Requirements

All confined space entry employees will be provided training at no cost and in a language they clearly understand prior to being involved with a confined space entry. Individuals who are not trained will not be allowed to enter a confined space or participate in confined space entry operations (even as an Attendant).

The content of this training will include the hazards associated with the types of spaces to be entered, feasible ways to isolate and/or control those hazards, and required precautions that employees must follow whenever those hazards cannot be controlled.

For those who will be expected to perform a confined space rescue, this training will also include a detailed explanation of the rescue procedures and a practiced rescue in a similar space. These mock rescues will also be performed at least annually thereafter. For those who will *not* be expected to perform a confined space rescue, training will include the dangers of attempting such a rescue.

Refresher training will be conducted if there is a deviation from established procedures, and whenever there is a change of duties, processes, or equipment.

All training will be documented by issuing a certification that displays the employee's name, trainer's name, and the date(s) of training. Training records must be made available to employees and their authorized representative(s).

Appendix A**VENTILATION OF CONFINED SPACES**

Ventilation is one of the most effective means of controlling hazardous atmospheres in confined spaces. In this procedure, clean air replaces contaminated air by natural or forced (mechanical) ventilation. If you are not familiar with this process and how to effectively ventilate, do not attempt to ventilate the space or make entry until a competent person is on site. Never enter an IDLH atmosphere.

Factors in Ventilating Confined Spaces

When ventilating a confined space, the following factors must be taken into consideration:

Volume of air:

This determines the capacity of the blower or ejector.

Type of atmosphere:

This will determine the type of blower or ejector used and the length of time needed to ventilate until it is safe for people to enter the space.

Access to space:

This determines how to get the ventilating air into and out of the space.

Power requirements and availability:

This will influence the power source and fan motor size. A portable generator may be required as a source of power.

Cost, efficiency, and maintenance:

This may have an effect on the type of device that is selected and what is necessary to keep it working properly.

Shape of space:

This will affect the type of directional device needed and the amount of air pressure required to provide sufficient ventilation.

Source of clean air:

This is necessary to ensure adequate ventilation.

Length of time ventilation is needed:

This is determined by the type of contaminant and the work that is to be done in the space.

Type of work to be done:

This determines whether local exhaust ventilation or general ventilation is required.

VENTILATION GUIDE

1. Select fan with a capacity to quickly replace the air in the space. Limitations are pasted on the fan housing.
2. Use reliable, grounded electrical power.
3. Eliminate any hazardous atmosphere. Exhaust toxic and flammable air; supply fresh air when oxygen-deficient.
4. Provide constant circulation of fresh air while space is occupied.
 - a. Natural ventilation is allowable only on "non-permit" entry.
 - b. Direct high-velocity supply ventilation to mix the air throughout the space.
 - c. Capture contaminants during hot work or cleaning with solvents by using additional local (or point) exhaust.
 - d. Pure oxygen is not "fresh air". Never use bottled oxygen for ventilation.
5. Arrange ductwork to ensure safety:
 - a. Locate supply fan intake away from flammable or toxic air.
 - b. Position exhaust fan outlet to avoid recirculation of bad air or endangering others outside the space.
 - c. Position exhaust duct inlet next to the source of contaminants.
 - d. Keep ducts short and straight.
 - e. Make sure air circulates through entire space and does not short-circuit.
6. Monitor the air to ensure ventilation is keeping the air safe to breathe.

Appendix B**PRECAUTIONS TO BE TAKEN DURING MANHOLE ENTRY**

1. Zero out all monitoring equipment in fresh air and make sure all equipment is properly calibrated according to manufacturer specifications.
2. Determine entry and exit locations.
3. Determine PPE and Equipment needs.
4. Check atmosphere before removing the manhole lid.
5. Determine who the Confined Space Competent Person on site is and document on the permit.
6. Determine and document Entry Supervisor, Attendant and Entrant.
7. Before entry, document all atmospheric readings on entry permit.
8. If a hazardous atmosphere is detected, entry shall not be permitted.
9. Contact your local SQC Coordinator or Regional Trainer before entry and after exit.
10. After entry, atmosphere shall be checked at regular intervals and documented on the permit (15 minute intervals).
11. During entry, if a hazardous atmosphere or condition is detected, immediate exit is required.
12. Document entry and exit times on the permit.
13. Entry is not allowed until all pre-entry requirements have been met and documented as such.
14. Once entry is complete, the entry permit must be closed out and completed.

Appendix C**PRECAUTIONS TO BE TAKEN DURING DOWN LINE ENTRY**

1. Zero out all monitoring equipment in fresh air and make sure all equipment is calibrated properly according to manufacturer recommendations.
2. Determine entry and exit locations.
3. Determine PPE and Equipment needs (Rock helmets, waders, glasses or goggles, rubber gloves, full body suits, Monitors, SCBA, 10 minute rescue pack, Miller Intruder, harness and lanyards, and any other applicable equipment as needed.
4. Inspect winches, harnesses (for expiration dates and defects) and document findings.
5. Post hospital location and emergency numbers (depending on the location you are working).
6. Determine what type of communication will be used (radios, voice, etc.).
7. Check atmosphere before removing the manhole lid using the 4 Gas Monitor.
8. Determine who the Confined Space Competent Person on site is and document on the permit.
9. Determine and document Entry Supervisor, Attendant and Entrant.
10. Before entry, document all atmospheric readings on entry permit (test for 2 minutes minimum to get an accurate reading).
11. If a hazardous atmosphere is detected, entry shall not be permitted.
12. Place an attendant upstream of the entry to monitor atmosphere and any changes within the confined space. Attendant will monitor from above ground and must have communication with the entry supervisor, other attendants and the entrants.
13. Contact your local SQC Coordinator or Regional Trainer before entry and after exit (except WEKO Division).
14. Lower in the down line entrant using the Miller Intruder System and harness.
15. Down line entrant should have on the proper PPE, 10 minute rescue pack available, and 4-gas monitor.
16. Lower in the second entrant using the Miller Intruder System and harness.
17. Second entrant shall be equipped with the proper PPE.
18. Lower in and have accessible a rescue board or pull cart in the event a man rescue is necessary.
19. After entry, atmosphere shall be checked at regular intervals and documented on the permit (60 minute intervals).
20. Attendant shall communicate with entrant continuously through pre-determined means to assure communication is maintained.
21. During entry, if a hazardous atmosphere or condition is detected, immediate exit is required.
22. Document entry and exit times on the permit.
23. Entry is not allowed until all pre-entry requirements have been met and documented as such.
24. Once entry is complete, the entry permit must be closed out. Permits should be kept and forwarded to the Regional SQC or Trainer, who will send to the Corporate Safety Department.

Appendix D**PRECAUTIONS TO BE TAKEN DURING CRAWL SPACE,
ATTIC, TRENCH BOXES, AND MANHOLE LIDS**

1. Zero out all monitoring equipment in fresh air.
2. Determine entry and exit locations.
3. Determine who the Confined Space Competent Person on site is and document on the permit.
4. Determine Entry Supervisor, Attendant and Entrant (Roles can be transferred).
5. Take atmospheric readings from outside the confined space by using a 4-gas monitor equipped with a hose or a wand.
6. Entrant will be required to maintain the 4-Gas Monitor and document all atmospheric readings on the entry permit (15 minute intervals).
7. Identify all hazards from outside the confined space other than atmospheric (examples: electric, water lines, sewage, insects, entrapment, entanglement, etc.).
8. If a hazardous condition is identified, do not enter the space.
9. Contact your local SQC Coordinator or Regional Trainer and wait for further instruction.
10. Entry is not allowed until all pre-entry requirements have been met and documented as such.
11. Document entry and exit times on the permit.
12. Entry Once entry is complete, the entry permit must be closed out and completed.

Appendix E**MILLER PIPELINE SELF RESCUE PROCEDURE**

1. Once man rescue is determined, 911 or local rescue services must be contacted.
2. Second entrant must don the SCBA.
3. Extraction of the victim from the confined space must begin.
4. 10 minute rescue bag must be placed on the victims head and the air turned on.
5. The rescue board or cart may be used to assist in the extraction of the victim.
6. Once the victim is removed from the confined space to a safe location, First Aid and CPR can be administered if needed until rescue services arrive.
7. Second entrant can then be removed from the confined space and the area secured.

Crane and Rigging

Purpose

Identify the proper procedures for controlling hazards associated with operating and working with cranes, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline who operate and work with cranes. Miller Pipeline utilizes only truck-mounted cranes and exempt “sideboom” cranes on our jobsites. Any other crane work on site will be performed by an approved subcontractor or third party. The mechanics garage at Corporate Headquarters does utilize two overhead gantry cranes.

Definitions

Competent Person: An individual recognized as having the proper training, knowledge, and ability to operate cranes safely.

Jib: The portion of the crane’s arm that extends out off the Boom.

Boom: The Arm of the crane that connects the cab to the Jib.

Out Riggers: Braces that extend out of the crane base on all Four Corners.

Load Chart: The calculations that determine the maximum allowable weight a crane can safely lift. Factors such as boom length, extended outriggers, and the angle the load will be at. All are factors in a lift and need to be considered.

Deflection: the amount of movement a crane will change under the weight of a load. Boom Deflection, Tire Deflection, Out Rigger deflection.

Pinch Point: The area around the cab of the crane that could catch a person passing by and crush them between the Cab of the crane and the base as it rotates.

Rigging - the art or process of safely attaching a load to a hook by means of adequately rated and properly applied slings and related hardware.

Responsibilities

Safety Director

Ensures that company owned cranes are inspected annually by a certified and trained professional that is competent enough to make proper repairs and do on-going maintenance.

Coordinates the annual inspection of cranes with a person that is recognized by the Department of Labor as competent to perform annual inspections. Also coordinates with the maintenance department on preventative maintenance of cranes.

Foreman

Oversees the safe use of crane equipment at the jobsite, and will ensure that the crane operator is trained and qualified for the equipment being used. In addition to ensuring that an operator is properly certified, the company must make sure each Operator is evaluated on each task they will perform. These evaluations must be documented.

Confirms that the crane operator has inspected the crane at the start of each shift, and it is inspected anytime the crane is moved or reset during the day.

Barricades or cautions off areas that have the potential for workers to come in contact with pinch points, or be able to cross under a lifted load.

Employees

Conduct formal inspections of cranes daily using the *Crane & Rigging Daily Inspection Report* (located in the Forms Section).

Perform the duties of a signaler when designated by the Foreman to do so, and remain in communication with the operator and or other signaler at all times while the load is being moved.

Test and ensure radio communication prior to lifting, ensure that the area is clear before the load is moved, and assist in controlling the area when rigging the load.

Understand the procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

Procedures

Daily Inspection Procedures

A competent person must conduct a visual inspection of equipment prior to each shift. The inspection must consist of observation for apparent deficiencies. Some inspection items shall include control mechanisms, pressurized lines, hooks and latches, wire rope, electrical apparatus, tires (when used), and ground conditions. Each wire rope must have affixed a durable permanent identification tag stating required information.

Operators will conduct formal inspections of all cranes each day by completing the *Crane & Rigging Daily Inspection Report* (located in the Forms section). Completed forms should be maintained onsite and in the cab of the crane. Documentation must include the following: items checked, results of inspection, and name and signature of the inspector. Documentation must be retained for 3 months.

All metal components will be inspected for excessive wear, twisting, distortion that could interfere with the proper function, and stretching beyond the manufacturer's recommendation. Defective rigging equipment shall be removed from service immediately.

All cranes shall be thoroughly inspected by a Competent Person before a crane is put back in service after 3 or more months in storage.

All repairs must be made by an experienced authorized person and any repairs and testing (load tests, etc.) must be documented, which shall be maintained on file.

Safety devices are required to be on all equipment and must be in proper working order before operations begin. If any of the devices are not in proper working order the equipment must be taken

out of service and operations must not resume until the device is working properly again. Examples of safety devices may include: crane level indicator, boom stops, jib stops, foot pedal brake locks, horns, etc.

Annual Inspection Procedures

A competent person will conduct certified inspections of all cranes once a year. These inspections will be documented by using the *Crane & Rigging Annual Inspection Report* (located in the Forms section). These forms will be given to the Safety Director to maintain on file.

The Fleet Department will maintain copies of all maintenance receipts and documentation of repair activities from outside maintenance companies.

Preventative Maintenance and Repair

The maintenance department will educate employees on preventative maintenance recommendations made by the manufacturer. Employees will be responsible for contacting the maintenance department to schedule the necessary maintenance.

If during a periodic inspection a piece of equipment is found defective, a tag reading "Out of Service" must be placed near the ignition, the key must be removed, and the machine may not be operated until the necessary repairs are made.

Whenever repair or alterations are made that could affect the operating limitations of the equipment, a rated load test must be performed. These tests shall not exceed 110 percent of the rated load at any selected working radius. Record of these tests must be maintained by the maintenance department showing the test procedures and confirming the adequacy of the repair/alterations.

Lift Meetings & Plans

Foremen, Operators, signal persons, and all other individuals who are involved with a lift will hold an informal meeting onsite before each lift, in order to discuss the details of the lift, any unique hazards, and all necessary precautions. This meeting will also include a physical walk around inspection of the work area for such issues as uneven or soft ground conditions, low overhead power lines, etc. Equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.

If more than one crane is required to perform a lift, then a formal documented "Lift Plan" shall be written. This plan must be reviewed/approved by someone who is considered to be "Competent" and "Qualified" per OSHA's Subpart CC prior to implementation, and shared with all employees prior to beginning the lift.

General Crane Safety Rules

All employees responsible for the operation, rigging and signaling of crane equipment will be held accountable for abiding by all of the following general crane safety rules. Most of these rules will be incorporated into the training of all affected employees.

Only certified operators are permitted to operate a crane.

Comply with all manufacturer procedures for operating the equipment, including its use with attachments. The operator shall have access to procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

Report immediately to your Foreman any unsafe condition found during the proportional check and/or during later operations of the crane. Whenever there is a safety concern, the operator has the authority to stop and refuse to handle loads until a qualified person has determined that safety has been assured.

Know the rated capacity of the crane before operating or attempting any lifting operation. Rigging equipment shall not be loaded beyond its recommended safe working load. Identification markings, indicating rated capacity for the type(s) of hitch(es) used, the angle upon which it is based, and the number of legs if more than one, shall be permanently affixed to the rigging.

Equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.

Cranes must be plainly marked with the rated load capacity on each side of the crane and in the crane cab, and if the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground or floor.

Written reports shall be made and maintained on rated load tests showing the test procedures and confirming the adequacy of any repairs or alterations.

The crane hook shall have a self-closing latch and the latch shall not be blocked open at any time.

Watch for co-workers near or on crane rails. Look down the rails in the direction of travel prior to bridge movement.

The crane operator shall ensure that the swing radius of the crane is barricaded, and no one enters this area during operation of the crane.

When approaching a barricade or designated boundary, stop the crane immediately. Find out why the warning was given and then proceed only when you are sure of safe operating conditions.

When approaching a pennant streamer across the building or other stop signal, stop crane immediately. Find out why the warning was given and then proceed only when you are sure of safe operating conditions.

Before moving a load, make sure that no one is in a position to be injured and that no equipment or material could be damaged by the lift.

Center the hook over the load before any lift is started, this will prevent swinging. Check with rigging personnel to ensure that the load center of gravity has been clearly established.

Sound crane bell, horn, or siren as you begin to move a load through high traffic areas and intersections.

All employees shall be kept clear of loads about to be lifted and of suspended loads. NEVER carry a load over co-workers.

If in doubt about clearing any object -STOP- seek assistance.

When Operators are relieved from duty, they shall report the operating condition of the crane to the other Operator.

All modifications or additions to the equipment must not be made without written approval from the manufacturer or approval is from a registered professional engineer.

Avoid parking cranes so that control pendants, hooks, grabs, or other lifting devices are left suspended over walkways.

When work on an overhead crane or gantry crane requires the crane to be tagged out, the cranes main electrical disconnect switch will be tagged and locked in the open position.

A fully charged 5-pound type ABC fire extinguisher will be maintained inside crane cabs. These extinguishers will remain ready for use and maintained as required in our "Fire Prevention Plan".

The following situations require cranes adjacent to the work area to be locked/tagged out or blocked when the work area is in the path of the bridges of these cranes:

- When working in a JLG, bucket truck, or other personnel lifting device
- When working with a mobile crane
- When working on the bridge of a gantry crane or small crane
- When working on a ladder or scaffold
- When working on any elevated platform or on any equipment

Comply with all manufacturer procedures applicable to the operational functions of equipment, including its use with attachments.

General Rigging (Material Handling) Safety Rules

Rigging equipment shall not be loaded beyond its recommended safe working load and load identification shall be attached to the rigging.

Rigging equipment not in use shall be removed from the immediate work area so as to not present a hazard to employees.

Tag line must be used to prevent rotation of the load, unless their use creates an unsafe condition.

Avoiding Electrical Contact

Contact the Electrical Company to determine if the lines can be de-energized, relocated, buried, or insulate the lines while the crane is operating in that location. Confirm with a competent person that the electrical source has been made safe before moving a crane near the energized source.

If unable to abate the electrical hazard, then special precautions need to be implemented. A written plan explaining the hazardous area, conditions that exist and how they will be addressed, plus the potential for contact be minimized and addressed. The use of attached insulated devices or other means should be considered.

The work zone shall be identified by demarcating boundaries such as flag and range limiting devices, or defining the work zone as 360 degrees around the equipment up to the maximum working radius. The hazard assessment must determine if any part of the equipment could get closer than 10 feet to a power line. The area within 10 feet in any direction from power lines is an unsafe work area and the area will be clearly marked off on the ground by marker tape, fence, or barriers.

Refer to the chart for minimum safe approach distance to energized sources.

Voltage Range (Phase or Phases)	Minimum Safe Approach Distance	
	Feet	Meters
0 - 300 V	Avoid Contact	
Over 300 V - 50 kV	10	3
Over 56 kV - 200kV	15	5
Over 200 kV - 350kV	20	6
Over 350 kV - 500 kV	25	8
Over 500 kV - 750 kV	35	11
Over 750 kV - 1000 kV	45	14

At no time is it allowable for the crane to come into contact with an energized source. If the crane does come into contact with an energized source, take the following precautions:

- Stay where you are
- Keep everyone away from the area and all equipment
- Instruct someone to call the fire department or de-energize the electrical parts if possible

If staying where you are is not practical due to additional hazards such as a fire or explosion, then take the following precautions:

- Move the crane off the energized source if possible
- If not possible, then JUMP from the cab. DO NOT STEP DOWN.
- Once on the ground HOP away. DO NOT WALK.

Crane Hand Signals

A signal person will be provided whenever any point of the operation or movement is not in full and direct view of the operator or the operator or person handling the load, determines it is necessary due to site specific concerns.

Signal persons must be trained and tested on OSHA's approved set of hand signals.

Although there may be a need for more than one signal person, only one individual will actually give hand signals directly to the operator.

All hand signals shall be made in a slow and controlled manner so that operators clearly understand each command. Signal persons must also be positioned in a well light area and so they are in clear view of the operator at all times.

All crane operators must abide by the following guidelines:

Crane operators must respond to signals given by one authorized signal person. If more than one signal person is giving signals, the crane operator shall not begin the lift and/or stop the lift and identify which individual will be giving the signals. However, if anyone (even someone who is not an authorized signaler) gives the STOP signal, the operator shall obey it.

If the signal is not understood or if it seems unsafe, the crane operator shall stop and communicate with the signaler to gain a more clear understanding of what is being asked and to make sure the instruction being given is truly safe to obey.

Attachments

Only attachments that are approved by the manufacturer will be used (e.g. basket guards or insulating links above the hooks). This approval will be documented and kept on file.

Training Requirements

Operators will be trained and tested by an accredited agency such as the National Commission for the Certification of Crane Operators (NCCCO). Employees who are involved with rigging and those who engage in hand signals with crane operators will be trained and qualified. Individuals who are involved with crane maintenance will also receive training.

In addition to ensuring that an operator is properly certified, the Company must make sure the operator is evaluated on each task they will perform. Evaluations must assess and determine that operators have the skills, knowledge, and ability to recognize and avert risk to operate the equipment safely. Once an operator has passed an evaluation on one piece of equipment, they may also be allowed to operate different equipment without further evaluation if Miller Pipeline can demonstrate that operating that equipment would not require substantially different skills, knowledge or ability. The evaluation must be documented and provide the operator's name, the evaluator's name and signature, the date of the evaluation, and the make, model, and configuration of equipment used in the evaluation.

Damage Prevention Plan

Purpose

This plan was developed to provide step-by-step procedures for our employees to follow that would minimize the possibility of damaging any underground facilities while excavating.

Scope

This policy applies to all employees involved in excavation activities.

Responsibilities

Safety Director

Ensure that all employees receive training as required by this plan.

Recognize positive behavior/performance related to Safe Digging

Structure progressive discipline for poor performance related to Safe Digging

Superintendents

Monitor adherence to this plan when conducting jobsite safety observations.

Procedures

Pre-Job Planning

Complete a thorough walk-through with Supervisor and Foreman prior to starting project identifying all conflicts and areas of concern.

Ensure all necessary prints and service cards are available for marking gas and other underground facilities.

Ensure all other utilities are identified and marked prior to starting any excavation work.

Daily Planning/Goal Setting

Foreman to walk down the work for the day with his crew and include safe digging as a topic for the Daily Planning Huddle.

Review stop work authority. (If something is mis-marked or we come across an unlocated facility stop work and replan and recall 811 and the operator).

Evaluate the locating equipment being used to ensure we are using good technology.

Spotting Utilities

Increase utilization of Dry Vac and Hydro-Vac technology for spotting utilities.

Use air probes versus sharp digging bars for hand spotting.

Remove sharp edges/points from all digging tools. (Use tools with bull nose or flat points)

Minimize the use of probe bars, and be sure that probes have bull nose or flat points.

Increased focus from both field & SQC leadership on Safe Digging procedures during inspections

Evaluate/modify Predictive Solutions menu items.

Look at inspection rates.

Identify high risk/problem employees that do not conform to safe procedures.

Damage Prevention Institute

DPI Accreditation is a proactive indication of an increased investment in damage-prevention to drive safety, reduce damages, and minimize the risks associated with excavating around buried assets. To obtain DPI certification, an excavator must have a complete Damage Prevention Safety Management System (DP-SMS) which specifically includes the following:

Acknowledgement from Top Management that obligates the organization to safe digging procedures and to adhere to all state dig laws.

All employees sign a document that they understand and are committed to adhering all state dig laws.

Annual safe digging awareness training for all workers on jobs with excavation.

Whistleblower and stop work responsibility for workers.

Policy to adhere to all applicable CGA Best Practices.

Policy to hire DPI accredited subcontractors with few exceptions.

Thorough investigation procedure to be used in the event of an incident.

Corrective action procedure with root cause analysis

In keeping with the requirements of maintaining DPI accreditation, and to advance damage prevention on jobs in which Miller Pipeline has decision-making authority, Miller Pipeline requires its subcontractors to also be DPI accredited when conducting any work that involves excavation (as defined below).

Excavation Definition

For purposes of this policy, the term "excavation" is defined as a ground disturbance activity that goes below ground, regardless of the tool used, and includes any operation in which earth, rock or other material in the ground is moved, removed, or is otherwise displaced by means of tools, equipment, or explosives. This includes typical items such as backhoe, trackhoe, trenching, digging, drilling, directional drilling, auguring, boring, hydrovac, etc.; as well as items which are less typically defined as "excavation," including grading, tunneling, scraping, cable or pipe plowing and driving, foundation work, fencing, pole-setting, vegetation and tree management, plumbing, sewer and drainage work, geologist and environmental, etc.

DPI Requirement

It is Miller Pipeline's policy to require DPI accreditation when hiring a subcontractor whose scope of work will include any excavation (as defined above).

Miller Pipeline will not consider an excavation bid from a subcontractor not DPI accredited unless it is the sole bid. Subcontractors may submit a bid without DPI accreditation, but bids without DPI

accreditation will not be considered when there is at least one DPI accredited bidder.

The intent of this policy is to require DPI accreditation when Miller Pipeline has decision-making authority over which subcontractor to use, while at the same time provide for exceptions in situations where Miller Pipeline does not have options. Example exceptions are as follows:

- *Highly-Specialized Work*: the work being subcontracted is highly specialized and there is only one company able to perform the work, and that company refuses to bid after having been notified that DPI accreditation is a requirement
- *Customer-Required Subcontractor List*: Miller Pipeline is required to subcontract from a list of companies that has been provided by the end customer, and Miller Pipeline has no ability to add additional bid requirements to such companies.
- *Remote Locations*: the work being subcontracted is being done in a remote location in which there is only one company able to perform the work in that location, and the company refuses to bid after having been notified that DPI accreditation is a requirement.

The above exceptions are guidelines and not hard-and-fast rules for not requiring DPI accreditation from Miller Pipeline subcontractors. The overriding principle is to require DPI accreditation from Miller Pipeline subcontractors.

Process When Using a Non-DPI Accredited Contractor

If a subcontractor is to be used that is not DPI Accredited, approval of that exception must be made in writing by the Regional VP of Operations. Requests for exceptions should be accompanied by documentation of Miller Pipeline notification to the subcontractor of the DPI Accreditation requirement.

If there are any questions on this policy, or whether an exception approval should be sought, please contact the Vice President of Environmental, Health, & Safety.

Training Requirements

Complete refresher locator training for all Foreman, laborers and operators.

Guidelines are trained/retrained and readily available for all employees for quick review if/when needed.

Train/retrain all employees on Safe Digging conventional excavation company guidelines.

Conduct specific training to the state 811 laws. (contact the state 811 for assistance)

Train/retrain all employees on proper technique while digging with a shovel.
(at this time we are developing a video to do this)

Train/retrain equipment operator[s] on proper positioning of equipment while excavating.

Directional Boring

Purpose

This plan was developed to ensure the safety of our employees and minimize the possibility of damaging “High Consequence Utility” lines during the directional boring process.

Scope

This policy applies to all employees who work with or are exposed to the directional boring process.

Responsibilities

Safety Director

Ensure that all employees receive training as required by this plan.

Superintendents/Foreman

Ensure that all employees follow this plan.

Procedures

Prior to any excavating or boring, the appropriate One Call agency shall be notified in advance to locate all underground structures and utilities.

All underground structures and utilities that have been located within the construction limits, which crosses or runs parallel to the proposed work, **shall be exposed to the required limits by either hand digging or vacuum excavating.** Adequate clearances shall be verified in all situations. All spot holes shall be excavated in a manner to prevent damage.

If our contract requires us to locate customer owned lines (specifically gas mains and services), the locating will be performed by the crew foreman. The Foreman is required to obtain prints from the owner prior to locating. The prints should be large enough to clearly see all potential conflicts. If the owner is unable to provide adequate drawings, the foreman must notify the local superintendent.

If Foreman elects to delegate to a responsible member on the crew, said individual shall have gone through pre-determined training related to locating gas lines and be familiar with customer specific prints.

Prior to installation activities, the Foreman and directional drill leader must walk intended route of the directional bore, then sign and date the construction drawings, signifying both have reviewed the site, and that all utilities have been properly identified and located.

Perpendicular Boring (Gas & Other)

Prior to boring across existing utility lines or buried structures of any type, physical verification is required by either hand digging or vacuum/hydro excavation, in accordance with state laws. When crossing High Consequence Utility Lines (see examples below), spot holes will extend at least 24” on either side of the actual utility line or structure and at a minimum, 24” below the exposed facility or to the proposed depth of the bore. During the bore and pull back, the spot holes shall be left open and monitored as the tooling passes over/under the high consequence utility. Rotating drill head or back reamer within 24” of the exposed high consequence utility is strictly prohibited. At all times, the utility must be protected from the drill rods, as changes in elevation within the bore path and soil conditions can lead to significant deflections in the drill string, particularly when drilling through spot holes where more than a few feet of boring rods are exposed or where there may be less than 24” of clearance. If higher than normal push or pull pressures are encountered during the boring or

reaming process, drill operator must stop and consult with crew foreman or supervisor, to make sure adequate measures are taken to prevent damage to exposed utilities.

Once located and verified for depth, utility lines not deemed high consequence (CATV, residential water services, telephone drops, street light cables, etc.) may be backfilled before boring begins.

- **High Consequence Utility Lines (HCU)** include, but are not limited to: Gas lines (mains or services), electric lines, water mains, telephone duct runs, toll cables or fiber optic lines.

Sewer Laterals

Sewer laterals shall also be treated as high consequence utilities, with the following exceptions:

If electronic located have been completed and it is determined that there will be more than 24" between the lateral and the bore path, no excavation is required.

If the laterals are inspected with CCTV units after the directional drilling process, and before the new main is energized, no excavation is required.

If a physical inspection of the property has determined that the lateral will not be in conflict with the bore path, no excavation is required.

Parallel Boring

Distribution Gas Lines and High Consequence Utilities (HCU)

When directional boring parallel to natural gas distribution lines of High Consequence Utilities, the bore path should be established to maintain a **minimum of five (5') feet clearance** between the existing structure and the back reamer. Normal safe boring practices shall be utilized outside the five (5') foot range. In cases where the clearance of the bore path and the existing line will be less than five (5') feet, authorization from the local superintendent shall be obtained prior to boring, and recorded on the pre-job plan or construction prints. Also, the existing utility line shall be exposed and verified at a **minimum of one hundred (100') foot intervals**. Actual location of the bore head in relation to the structure must be verified and adequate clearance must be maintained at all times.

Transmission Lines (Natural gas of flammable liquids)

When directional boring parallel to transmission gas or hazardous liquid pipeline, or any pipeline where pressure exceeds 60 pounds, the bore path shall be established to maintain a **minimum of ten (10') feet of clearance** between the existing pipeline and the back reamer. Normal safe boring practices will be utilized outside the ten (10') foot range. In cases where the bore path is less than ten (10') feet from the existing pipeline, authorization from the Regional Manager or Vice President shall be obtained prior to boring and recorded on the pre-job plan or construction drawings. Also, the existing pipeline shall be exposed and verified at a **minimum of fifty (50') foot intervals**. Actual location of the bore head in relation to the structure must be verified and adequate clearance must be maintained at all times.

AT NO TIME WILL BORING BE ALLOWED WITHIN 5' FEET ON ANY TRANSMISSION LINE.

Parallel Boring (Other)

When directional boring parallel to other utilities, the bore path should be established to maintain a **minimum of five (5') feet of clearance** between the existing utility and the back reamer. The utility should be spotted at reasonable intervals to verify its exact location. If boring within five (5') feet is required, the utility must be spotted at a minimum of one hundred (100') foot intervals. The minimum distance allowed by state law – between back reamer and the utility – must be maintained at all times.

NOTE: These are Miller Pipeline's minimum standards. Minimum clearance allowed by state law must be maintained at all times. If the standards of the customer or state law exceed those of Miller Pipeline, the customer or state requirements shall apply.

** See drawings on next page for examples of utility crossings and proper spot holes.

Directional Boring Procedure

Jobsite Preparation

All HDD/boring jobsites must have a walk of the bore path jointly completed by the Foreman and drill operator (at minimum). It is also recommended that drilling assistants and appropriate utility personnel be involved in this process. If parties are in agreement, this must be documented with signature(s) on the job prints before any drilling occurs.

Use appropriate protection for the jobsite, and take steps to keep the public and any unauthorized personnel out of the work zone, including:

- Placing warning signs along sidewalks (positioned to divert traffic away from work areas)
- Use cones/cone toppers, caution tape, or barricades to create a perimeter around drill before operating.
- The voltage stake for the strike alert system must be placed into the ground before drilling begins.
- Insert voltage stake into ground at least 6 feet away from machine and not over the drill string.
- Strike alert should be tested and working properly before drilling begins.
- Holes should be covered and protected when not attended.

Personal Protective Equipment

During all HDD drilling and boring machine operations, site personnel will be required to wear the following:

- Eye Protection
- Hard Hats
- Hearing Protection
- Safety Shoes (steel-toed or composite toed boots)
- Safety Vests (Class II minimum)
- Appropriate gloves (i.e. canvas, cut-resistant) shall be worn when changing out tooling and handling heavy or sharp/jagged materials.

For crew members working near the bore path, electrically insulated boots must be worn due to potential of the ground becoming electrically charged if a strike were to occur.

Additionally, electrically insulated boots and electrically insulated gloves should be worn by:

- anyone placing the Strike Alert (voltage sensor) in the ground.
- anyone standing on the ground while touching the directional drill.
- this includes any crew members manually loading rods into the box.

Personnel in the vicinity of drilling operations should avoid the following items due to the potential for entanglement in rotating equipment and potential injury:

- Loose clothing
- Rings
- Wristwatches
- Necklaces
- Bracelets
- Long hair (should be tied back)

Operations-General

The manufacturer's safe operating procedures, precautions, warnings, and recommendations must be followed during drilling operations.

When drilling equipment is in use, the following precautions should be taken.

- Operators and spotters must have a communication plan/method before work begins, including how they will communicate when out of sight.
- A perimeter of cones/cone toppers, caution tape, or barricades must be in place, along with voltage stake.
- These should remain throughout drilling operations to deter entry/alert in the event of a strike.
- Only the operator is allowed inside the barricade and on the machine while operating.
- Crew members must ensure that no one is allowed to touch any of the drilling equipment at any time unless given permission by the drill crew. This includes all trucks, trailers, support equipment and hoses.

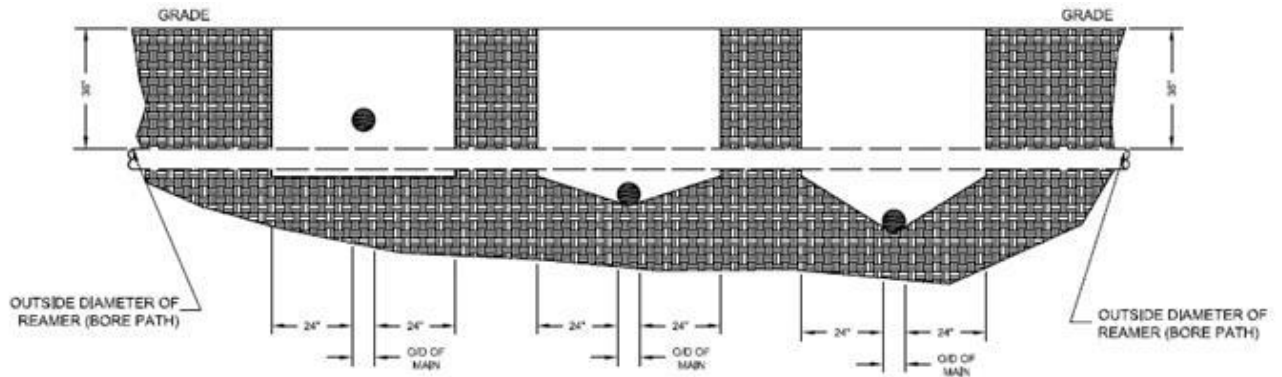
Loading/unloading of drills should be done with drills at low throttle and low speed setting. Ensure all employees and site personnel are at a safe distance during all tracking, loading and unloading operations.

Training Requirements

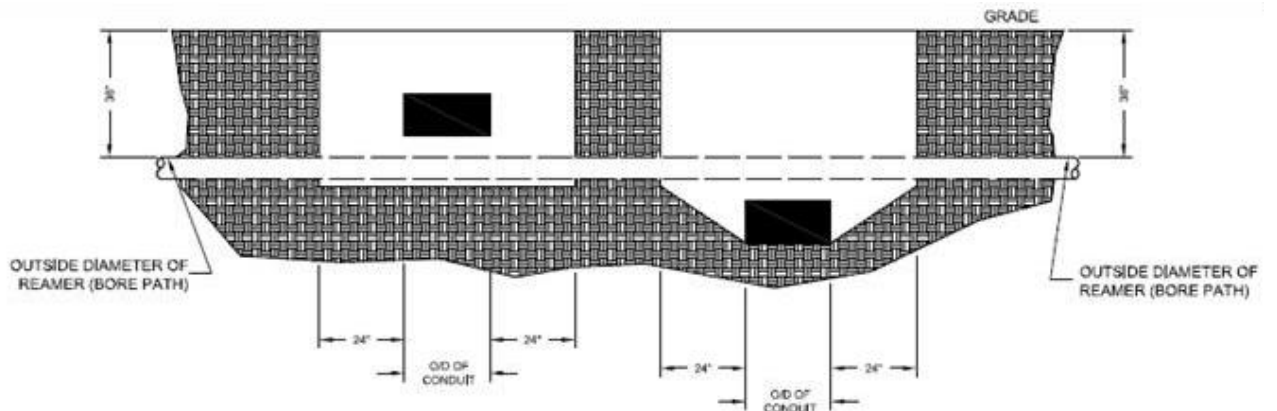
Employees who will be involved with directional boring shall receive training prior to this type of work.

DIRECTIONAL BORING PLAN

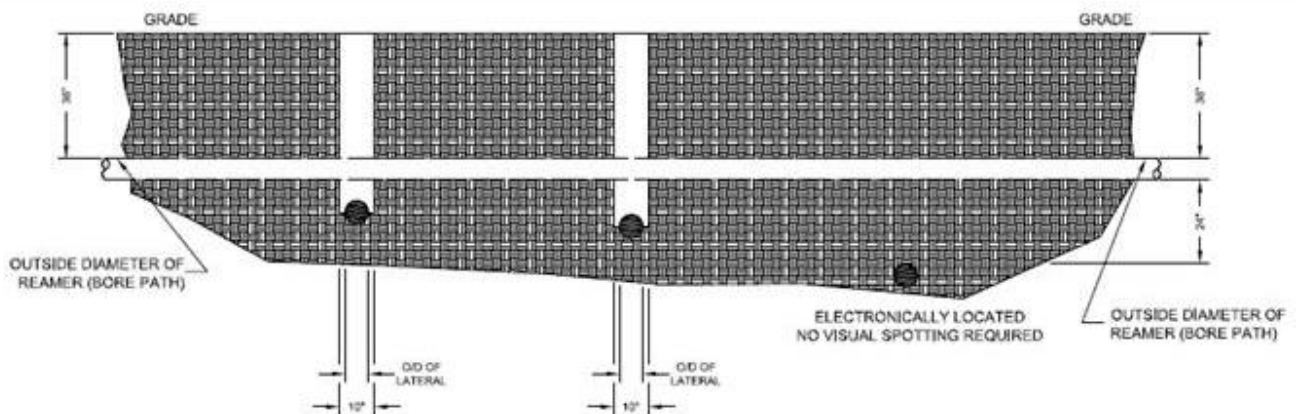
SPOT HOLES FOR DRILLING OVER/UNDER 6" HCU LINE AT VARIOUS DEPTHS



SPOT HOLES FOR DRILLING OVER/UNDER HCU DUCT AT VARIOUS DEPTHS



SPOT HOLES FOR DRILLING OVER/UNDER SEWER LATERAL AT VARIOUS DEPTHS



Electrical Safety

Purpose

This program has been established to ensure the safety of our employees who may work on or near electrical equipment, while also complying with OSHA and NFPA 70E standards.

Scope

This program applies to all Miller Pipeline employees.

Definitions

Arc Flash Boundary - The distance from exposed live parts which a person could receive a second-degree burn if an electrical arc flash were to occur.

Incident Energy – The amount of thermal energy an employee would be exposed to if an arc fault would occur. Incident energy is measured as cal/cm².

Limited Approach Boundary – The distance from an exposed energized conductor or circuit part at which a shock hazard exists.

Qualified Electrical Worker – A person who is knowledgeable in the construction, operation and maintenance of electrical equipment and has been trained to recognize and avoid the electrical hazards that might be present during the course of work. Miller Pipeline employees are not Qualified Electrical Workers.

Restricted Approach Boundary – The distance from an exposed energized part which there is an increased risk of shock, due to electrical arc-over combined with inadvertent movement, for personnel working within close proximity to the part.

Responsibilities**Safety Director**

Periodically reviews (at least annually) this written program against the daily field audits & make updates when necessary.

Ensure employees receive appropriate training & maintain documentation.

Evaluate work being performed and ensure compliance with this program.

Foremen/SQC's

Mentor new employees & provide on-the-job training as deemed necessary.

Monitor jobsite activities daily to ensure compliance with this policy.

Ensure employees are provided with and use appropriate protective equipment.

Promote electrical safety awareness to all employees daily.

Employees

Attend all training required relative to this program.

Follow the work practices described in this document, including the use of appropriate protective equipment and tools.

Immediately report any concerns related to electrical safety to supervision.

Arc Flash Risk Assessment

As the organization works in mostly residential installation environments, incident energy analysis has not been performed on electrical equipment for the worker's information. Since most equipment has not been labeled with arc flash hazard ratings, the AF PPE Categories method will be used.

The term **PPE Category** is used to determine the PPE to be worn per the tables method which is described below.

PPE Selection for Categories Method

The following method may be utilized by qualified electrical workers. However, please note that this PPE selection methodology does not meet all requirements of the 2021 NFPA 70E. This methodology is intended to ensure that workers risk is limited for the potential of receiving catastrophic burn injuries or death resulting from arc flashes. Without arc flash studies performed, there can be no certainty on the amount of incident energy present at each work location.

If the Qualified Electrical Worker is only exposed to 1Ø power during a task, they may wear their uniform arc rated long sleeve/pants, appropriate rubber gloves with leather protectors, hearing protection, and safety glasses. If 3Ø power is present, the Qualified Electrical Worker must utilize additional PPE per the PPE Categories described below.

In addition to utilizing the PPE Category method, **risk assessments shall be performed to ensure selection of PPE takes into consideration the condition of equipment and environmental concerns.**

PPE Category 2

For accessing electrical equipment with live 3Ø power present up to a highest nominal voltage of 240 Volts and not exceeding 400 amp ratings, AF PPE Category 2 shall be worn.

When the AF PPE Category Method indicates that the electrical enclosure is PPE Category 2, the following articles of PPE will be worn for energized work, testing & troubleshooting:

- (1) Arc rated face shield with hard hat
- (2) Arc rated balaclava
- (3) Safety glasses
- (4) Hearing protection
- (5) Leather protectors
- (6) Insulated gloves (if entering into restricted approach boundary)
- (7) Leather shoes with rubber soles
- (8) Arc rated long sleeve shirt and pants or coverall (minimum rating of 8 cal/cm²)



11.4.2 PPE Category 4

For accessing equipment beyond the ratings listed for Category 2, AF PPE Category 4 shall be worn. Extreme caution should be utilized, and management must be informed prior to starting work for approval.

When the AF PPE Category Method indicates that the electrical enclosure is PPE Category 4, the following articles of PPE will be worn. This PPE may also be needed for 'change of state' electrical work:

- (1) Arc rated bee-keeper style hood (minimum rating of 40 cal/cm²)
- (2) Safety glasses
- (3) Hearing protection
- (4) Leather protectors
- (5) Insulated gloves (if entering into restricted approach boundary)
- (6) Leather shoes with rubber soles
- (7) Arc rated pants (minimum rating of 40 cal/cm²)
- (8) Arc rated jacket (minimum rating of 40 cal/cm²)



Procedures

Basic Electrical Hazards

Arc Blast Impact: The heating of air and vaporization of metal creates a pressure wave that can damage hearing and cause memory loss (from concussion) and other injuries. Flying metal parts are also a hazard.

Arc Flash Burns: An electric arc flash can occur if a conductive object gets to energized parts (for instance, while opening or closing disconnects). The arc can heat the air to temperatures as high as 35,000-degrees F, and vaporize metal in the equipment. The arc flash can cause severe skin burns by direct heat exposure and by igniting clothing.

Electric Shock & Burns: An electric shock occurs when electric current passes through the body. This can happen when touching an energized part. If the electric current passes across the chest or head, death can result. At high voltages, severe burns can result.

Falls: Electric shocks and arc blasts can cause falls, especially from ladders or unguarded scaffolding.

Extension Cords & Portable Electrical Equipment

Extension cords may only be used to provide temporary power.

Portable cord-and-plug connected equipment and extension cords must be visually inspected before use for external defects such as loose parts, deformed and missing pins, or damage to outer jacket or insulation, and for possible internal damage such as pinched or crushed outer jacket. Any defective cord or cord-and-plug-connected equipment must be removed from service and no person may use it until it is repaired and inspected to ensure it is safe for use.

Extension cords must be of the three-wire type. Extension cords and flexible cords must be of the proper rating for commercial construction use (e.g. S, ST, SO). The rating or approval must be visible.

Job-made extension cords are forbidden per the National Electrical Code (NEC).

A ground-fault circuit interrupter (GFCI) must be provided, and used when personnel are performing work on renovation or construction sites using extension cords, or where work is performed in damp or

wet locations.

Portable equipment must be handled in a manner that will not cause damage.

Flexible electric cords connected to equipment may not be used for raising or lowering the equipment.

Extension cords must be protected from damage. Sharp corners and projections must be avoided.

Flexible cords may not be run through windows or doors unless protected from damage, and then only on a temporary basis. Flexible cords may not be run above ceilings or inside or through walls, ceilings or floors, and may not be fastened with staples or otherwise hung in such a fashion as to damage the outer jacket or insulation.

Cords should be covered by a cord protector or tape when they extend into a walkway or other path of travel to avoid creating a trip hazard.

Extension cords used with grounding type equipment must contain an equipment-grounding conductor (i.e., the cord must accept a three-prong or grounded plug).

Attachment plugs and receptacles may not be connected or altered in any way that would interrupt the continuity of the equipment grounding conductor. Additionally, these devices may not be altered to allow the grounding pole to be inserted into current connector slots. Clipping the grounding prong from an electrical plug is prohibited.

Flexible cords may only be plugged into grounded receptacles. In the event a two-pronged outlet is encountered, it is recommended that the receptacle be replaced with a three-prong outlet. Adapters that interrupt the continuity of the equipment grounding connection may not be used.

All portable electric equipment and flexible cords used in highly conductive work locations, such as those with water or other conductive liquids, or in places where employees are likely to contact water or conductive liquids, must be approved for those locations.

Employee's hands must be dry when plugging and unplugging flexible cords and cord-and-plug connected equipment if energized equipment is involved.

If the connection could provide a conducting path to employee's hands (for example, if a cord connector is wet from being immersed in water), the energized plug and receptacle connections must be handled only with insulating protective equipment.

Locking type connectors must be properly locked into the connector.

Lamps for general illumination must be protected from breakage and metal shell sockets must be grounded.

Temporary lights may not be suspended by their cords unless designed for this purpose.

Portable lighting used in wet or conductive locations, such as tanks or boilers, must be operated at no more than 120 volts or must be protected by GFCI.

Extension cords are considered "temporary wiring" and must comply with the section on "Requirements for Temporary Wiring" in this program.

Temporary Wiring Requirements

Temporary electrical power and lighting installations 600 volts or less, including flexible cords, cables and extension cords, may only be used during and for renovation, maintenance, repair, or experimental work. The duration for temporary wiring used for decorative lighting for special events and similar purposes may not exceed 90 days. The following additional requirements apply:

- Ground-fault protection (e.g., ground-fault circuit interrupters or GFCI) must be provided on all temporary-wiring circuits, including extension cords used on construction sites.
- In general, all equipment and tools connected by cord-and-plug must be grounded. Listed or labeled as UL double insulated tools and appliances need not be grounded.
- Temporary electrical services other than a single extension cord, must originate from an approved distribution panel board that is rated for the voltages and currents the system is expected to carry.
- These installations must conform as outlined in the National Electric Code (NEC).
- Neither bare conductors nor earth returns may be used for the wiring of any temporary circuit.
- Receptacles must be of the grounding type, each branch circuit must contain a separate equipment-grounding conductor, and all receptacles must be electrically connected to the grounding conductor.
- Flexible cords and cables must be of an approved type and suitable for the location and intended use. They may only be used for pendants, wiring of fixtures, connection of portable lamps or appliances, elevators, hoists, connection of stationary equipment where frequently interchanged, prevention of transmission of noise or vibration, data processing cables, or where needed to permit maintenance or repair. They may not be used as a substitute for the fixed wiring, where run through holes in walls, ceilings or floors, where run through doorways, windows or similar openings, where attached to building surfaces, or where concealed behind building walls, ceilings or floors.
- Suitable disconnecting switches or plug connects must be installed to permit the disconnection of all ungrounded conductors of each temporary circuit.
- Lamps for general illumination must be protected from accidental contact or damage, either by elevating the fixture or by providing a suitable guard. Hand lamps supplied by flexible cord must be equipped with a handle of molded composition or other approved material and must be equipped with a substantial bulb guard.
- Flexible cords and cables must be protected from accidental damage. Sharp corners and projections are to be avoided. Flexible cords and cables must be protected from damage when they pass through doorways or other pinch points.

Wet or Damp Locations

Work in wet or damp locations (i.e., areas surrounded or near water or other liquids) should be postponed until the liquid can be cleaned up.

If this is not possible, then remove standing water before beginning work, place a dry barrier over any wet or damp work surface, avoid running cords through standing water, and make sure Ground Fault Circuit Interrupters (GFCI) are on each outlet being used.

Overhead Power Lines

When work must be performed within 10' from overhead power lines, the lines shall be de-energized and grounded.

If the lines are to be de-energized, arrangements shall be made with the person or organization that operates or controls the electric circuits involved to de-energize and ground them.

If de-energizing lines is not possible, practical or feasible, then all other precautions identified in this

section must be followed.

When an unqualified person is working in an elevated position near overhead lines, the location shall be such that the person and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following distances:

- For voltages to ground 50kV or below - 10 feet (305 cm);
- For voltages to ground over 50kV - 10 feet (305 cm) plus 4 inches (10 cm) for every 10kV over 50kV.

When a qualified person is working in the vicinity of overhead lines, whether in an elevated position or on the ground, the person may not approach or take any conductive object without an approved insulating handle closer to exposed energized parts than shown in Table S5.

TABLE S5

Voltage range (phase to phase)	Minimum approach distance
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm).
Over 750V, not over 2kV	1 ft. 6 in. (46 cm).
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm).
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm).
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm).
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm).
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm).

Where any vehicle or mechanical equipment structure must be elevated near energized overhead lines, they shall be operated so that the limited approach boundary distance of NFPA Table 130.4(E)(a) is maintained (see Appendix A below). However, under any of the following conditions, the clearances shall be permitted to be reduced:

If the vehicle is in transit with its structure lowered, the limited approach boundary distance to the overhead lines in NFPA Table 130.4(E)(a) or Appendix A shall be permitted to be reduced by 6 ft.

If insulated barriers, rated for the voltages involved, are installed and they are not part of an attachment to the vehicle, the clearance shall be permitted to be reduced to the design working dimensions of the insulating barrier.

If the equipment is an aerial lift insulated for the voltage involved, and if the work is performed by a qualified person, the clearance (between the un-insulated portion of the aerial lift and the power line) shall be permitted to be reduced to the restricted approach boundary given in NFPA Table 130.4(E)(a) or Appendix A below.

Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines shall be intentionally grounded.

All employees working on the ground near a grounding point shall not stand at the grounding location whenever there is a possibility of overhead line contact.

Additional precautions, such as the use of barricades or insulation, shall be taken to protect employees from hazardous ground potentials (step and touch potential), which can develop within a few feet or more outward from the ground point.

Employees standing on the ground shall not contact the vehicle or mechanical equipment or any of its attachments, unless one of the following applies:

- The employee is wearing PPE rated for the voltage.
- The equipment is located so that no un-insulated part of the structure (that portion of the structure that provides a conductive path to employees on the ground) can come closer to the line than 10'.

Underground Power Lines

National 811 must be called to request utility locates at least 48-hours prior to excavating.

Underground power lines must be fully exposed using fiberglass handled shovels and positively identified before powered equipment is permitted to enter the “no dig zone” (18-30 inches depending on state law). If the excavation area is covered with a hard surface (e.g. concrete, asphalt, etc.) powered equipment can be used to remove the hard surface only, but not the soil underneath.

If utilities are found underground that are encased in concrete or other hard surface that interferes with planned work:

1. Stop work and contact the customer and/or the gas utility company to discuss the discovered situation.
2. Work with customer/utility owner to lockout and tagout the utility that is encased in the hard surface.
3. If the utility cannot be locked and tagged out and verified to a zero-energy state, the work will be completed by a subcontractor that specializes in working with or around the utility in question.

Under no circumstances shall any electric or other high consequence utilities encased or capped in concrete be broken, chipped, cut, removed, or otherwise disturbed by mechanical tools, pneumatic tools, hand tools, or by hand excavating.

While exposing power lines employees must wear “Electrical Hazard” (EH) rated boots. If the employee is exposing an electrical main or high voltage line, they must wear adequately rated dielectric boots and dielectric gloves with leather protectors. Dielectric boots shall be inspected visually before use and manually tested annually by an approved 3rd party. Electrically insulated gloves must be tested before issue (if not new), and every 6 months thereafter, also by an approved 3rd party. For questions on different types of dielectric boots/gloves available and associated testing requirements, please review Appendix A or contact the Safety Director.

Equipment operators must be accompanied by a spotter when excavating near an electrical utility in order to ensure adequate clearance.

Exposed utilities shall be supported as necessary.

Working on De-Energized Equipment

Miller Pipeline employees are required to work in homes, around appliances, and with utilities that have the potential to become unexpectedly energized. Some common examples include gas meter sets, water lines, HVAC ducts, refrigerators, ranges, etc.

The most important principle of electrical safety is to assume all electric circuits are energized unless each involved worker ensures they are not. The NFPA recommends that workers follow these six steps in order to ensure this:

1. Identify all sources of power to the equipment. Check applicable up-to-date drawings, diagrams, and identification tags.
2. Remove the load current and then open the disconnecting devices for each power source.
3. Where possible, visually verify that blades of disconnecting devices are fully open or that draw-out type circuit breakers are fully withdrawn.
4. Apply lockout/tagout devices in accordance with a formal, written policy.

5. Test each phase conductor or circuit part with an adequately rated voltage detector to verify that the equipment is de-energized. Test each phase conductor or circuit part both phase-to-phase and phase-to-ground. Check the voltage detector before and after each test on a known live source to ensure it is working while confirming no voltage is present. Voltage testers should be kept clean, in their cases, and batteries checked frequently to ensure proper operation.
6. Properly ground all possible sources of induced voltage and stored electric energy (such as, capacitors) before touching. If conductors or circuit parts that are being de-energized could contact other exposed conductors or circuit parts, apply ground-connecting devices rated for the available fault current.

Please note that the process of de-energizing electrical equipment is to be considered "live" work and can result in an arc flash due to equipment failure. Therefore, the procedures outlined in this policy for working on live parts must be followed whenever de-energizing.

The host employer must be notified of any unique hazards presented by our work, any unanticipated hazards found during our work that were not mentioned by the host employer, and the measures taken to correct those hazards.

Approach Distance Requirements

Limited Approach Boundary: Access shall be controlled by way of locking all doors that lead to the area, installing red danger tape around the area, or using another suitable barricade. Only Qualified Electrical Workers shall be permitted to cross this boundary unless escorted by a qualified person.

Restricted Approach Boundary: These boundaries may only be crossed by Qualified Electrical Workers wearing the proper level of PPE and using properly insulated tools. While working they must keep as much of their body out of the restricted space as possible.

Arc Flash Boundary: Anyone who crosses this boundary must wear the proper level of Arc Rated PPE (including clients, other contractors, and non-qualified persons working nearby).

Other Precautions

Adequate illumination shall be established so the qualified person can see the entire work area and all components that are to be worked on. Employees cannot enter spaces with exposed energized parts without proper illumination.

Employees shall not reach blindly into areas that might contain live parts.

Conductors and parts of electrical equipment that have been deenergized but not been locked or tagged out shall be treated as live parts.

Conductive articles of jewelry and clothing shall be removed prior to starting work (e.g. watches, bracelets, necklaces, rings, key chains, metal framed glasses, etc.).

When an employee works in a tight area that contains exposed live parts, the employee shall use protective shields, barriers or insulating materials as necessary to avoid contact with these parts.

Conductive materials, tools, and equipment shall be handled in a manner that prevents accidental contact with live parts. Such materials and equipment include, but are not limited to long conductive objects such as ducts, pipes, tubes, conductive hose and rope, metal-lined rules and scales, steel tapes, metal scaffold or ladders, chains, etc.

Signs & Barricades

Barricades shall be used in conjunction with safety signs (never by themselves) to prevent or limit access to work areas containing live parts. Conductive barricades shall not be used where they might cause an electrical hazard. Barricades shall be placed no closer than the Limited Approach Boundary. Safety signs must meet the requirements of ANSI Z535 Table 130.7(F)

If signs and barricades do not provide sufficient protection, an attendant will be assigned to warn and protect pedestrians. The primary duty of the attendant shall be to keep an unqualified person out of the work area where an electrical hazard exists. The attendant shall remain in the area as long as there is a potential exposure to electrical hazards.

Subcontractor Requirements

Safety programs used by subcontractors must meet or exceed all applicable guidelines of this plan.

Subcontractors are required to comply with applicable safety and health regulations such as OSHA, NFPA, and EPA.

Subcontractors may be required to submit copies of their safety program to the Miller Pipeline Safety Director upon request. In addition, by submitting such a program, it does not constitute shared liability with Miller Pipeline.

Training Requirements

Unqualified Electrical Worker Training

Any employee who is *not* expected or authorized to work on or near energized parts, but may be inadvertently exposed to electrical parts at or above 50-volts or at risk of electric shock, and who are not qualified persons shall be trained in "General Electrical Awareness". Since this applies to all employees it will be included in the company's Safety Orientation training program, and conducted annually thereafter.

Documentation of training shall be maintained by the Safety Director at the corporate office for the duration of each individual's employment.

Annual LOTO protective card procedures to follow customer standards.

Qualified electrical employees to be trained at minimum annually, not to exceed two years.

APPENDIX A

The following procedure should be followed when performing daily inspections of **dielectric gloves**:

- 1) Remove the leather protectors and visually inspect them for chemical damage, deterioration, tears or rips.



- 2) Clean debris off the dielectric gloves before inspection.
- 3) Turn one of the dielectric gloves inside out, pinch the cuff of the glove together, and spin the glove around to trap air into the glove.



- 4) Pop the fingers out and hold it next to your face and ear while feeling and listening for any escaping air.
- 5) Visually inspect the glove for any holes, cuts, small interlacing cracks, imbedded objects, swelling, softening, hardening, sticky spots or other defects.
- 6) Release your grip on the glove to allow the air to escape, and then visually inspect the cuff of the glove for the same defects.
- 7) When finished, turn the glove right-side-out and repeat steps 3-5.
- 8) Repeat steps 2-6 for the second dielectric glove.
- 9) Discard these products if any defects are found.

The following procedure should be followed when performing daily inspections of **dielectric boots**:

- 1) Clean debris off the dielectric boots/shoes before inspection.



- 2) Hold the toe and heel of one of the boots, bend the sole so it flexes toward you, hold it in that position, and visually inspect the sole for any defects (i.e. holes, cuts, imbedded objects, swelling, softening, hardening, sticky spots or other defects).
- 3) Inspect the remainder of the rubber boot for the same defects.
- 4) When finished, repeat steps 2-3 for the other boot.
- 5) Discard these products if any defects are found.

Emergency Action Plan

Purpose

To ensure the safety of individuals when an emergency situation or natural disaster occurs.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

President & COO

Follow this policy when dealing with the media.

Safety Director

Ensure that this policy is completely implemented and evaluated on an annual basis.

Superintendent/Foreman

Educate all crew members of their duties and the procedures to follow specific to the jobsite in case of an emergency. They will also document this training.

Take the lead by directing all company employees onsite according to this plan and site-specific procedures if an emergency situation occurs.

Perform First-Aid/CPR on employees who need immediate care.

Employees

Alert the Foreman immediately when an emergency situation arises.

Procedures

Emergency Planning (Facilities)

Review the emergency action plan when the plan is developed/changed, when the employee is initially assigned to a job, and when the employee's responsibilities under the plan change.

At least two (2) individuals will be identified as "Company Emergency Responders" at each company office/facility. These individuals will be trained in First Aid/CPR and be responsible for implementing the procedures outlined in this plan if an emergency situation were to occur.

Weather radios will be given to at least one Company Emergency Responder in each facility of 10 or more people in order to give them advanced warning of upcoming emergency situations.

Emergency Action Plans/Maps will be published & posted inside of each facility that consists of 10 or more people. These maps will identify the facility layout, exits, designated shelter areas, and rally point. An emergency action plan must include procedures to account for all employees after evacuation. If more information is needed about the plan, please contact the Safety Director.

All affected employees will be educated on the contents of this policy, which will include random mock emergency drills.

Emergency Planning (Jobsites)

Foremen will serve as the “Company Emergency Responder” on each jobsite. Prior to beginning each project, Foremen will determine the *Emergency Action Plan*, and review the information with all company employees onsite. This plan will identify the site layout, exit ways, designated shelter areas, and a rally point. If more information is needed about the Emergency Action Plan for the jobsite, please contact the Foreman.

An “Emergency Response Checklist” that guides Foremen on how to respond to emergencies will be placed inside all incident packets to guide employees during crisis situations.

Jobsite Foreman Response Procedures

If an emergency situation occurs outside of normal business hours that require a supervisor or manager to be contacted who is unavailable at the time, call our 24-hour emergency hotline at (800) 761-0873.

Chemical Spill or Terrorism

1. If a chemical spill or act of terrorism creates a hazard inside a building (i.e. bomb threat):
 - a. Instruct all employees to evacuate the area/facility immediately.
 - b. Assign monitors (if necessary) to restrict access to the area.
 - c. Gather at the designated rally point.
 - d. Call 911.
 - e. Do not re-enter the area/facility until instructed by 911 Emergency Responders.
2. If a chemical spill or act of terrorism creates a hazard outside a building (i.e. radiation):
 - a. Instruct all employees to report to the designated shelter area immediately.
 - b. Seek shelter in the designated shelter area.
 - c. Company Emergency Responders will:
 - Close and lock all doors and windows.
 - Use duct tape to seal all door frames (if available).
 - Communicate with 911 and/or the local fire service to determine next steps.
 - d. Do not leave the shelter area until instructed by 911 or the local fire service.
3. Notify your Superintendent, the Safety Director, and Corporate Compliance Director.

Earthquake

1. If outside, stay away from all structures, buildings, poles and overhead power lines.
2. If inside, seek shelter *directly beside* a rigid structure immediately (e.g. desk, filing cabinet, etc.).
3. If life-threatening injury or severe damage occurs:
 - a. Evacuate the building.
 - b. Look for and stay at least 50' away from any down power lines.
 - c. Gather at or near the designated rally point.
 - d. Company Emergency Responders will:
 - Call 911.
 - Attend to any injuries until the 911 Emergency Responders arrive.
 - e. Do not re-enter the facility until instructed by 911 Emergency Responders.

Electrical Line Strike

1. Upon striking an electric line with equipment or a vehicle:
 - a. Instruct everyone in the immediate area to stand still and keep everyone else away.
 - b. Attempt to break contact with the electric line.
 - c. Stay put until the line can be de-energized (even if you break contact).
 - d. Call the electric company (begin documenting all conversations and activities).
 - e. Notify the customer and your Superintendent.

2. If the equipment ignites while waiting for emergency responders:
 - a. Jump away from the equipment.
 - b. Don't hold onto the equipment and land on both feet.
 - c. Hop or shuffle in a straight line away from the equipment.
 - d. If shocked, turn 90-degrees and continue hopping/shuffling.

Excavating Contaminated Soil

1. Upon discovering soil that is unexpectedly contaminated with a hazardous substance:
 - a. Stop all job activities in the immediate area.
 - b. Secure and isolate the area.
 - c. Notify the customer and your Superintendent (begin documenting all conversations and activities).
 - d. Wait for a customer representative and your Superintendent to arrive at the location and decide how to resolve the situation.
 - e. Assist in resolving the situation as directed.
 - f. Depending on the substance, all employees and equipment may need to be decontaminated at the jobsite before they are permitted to leave.

Fiber-Optic Strike

1. If an employee damages a fiber-optic cable:
 - a. Avoid touching or looking into the ends of the cut cable.
 - b. Notify your Superintendent, the Safety Quality and Compliance Coordinator/Safety & Compliance Specialist, and the utility company immediately.
 - c. Treat broken fiber shards like glass shards.
 - d. Wash skin if contact with cable occurs.

Fire or Explosion

1. Extinguish the fire with a nearby extinguisher (if the fire is small and you are trained). If it is a large natural gas fire that is NOT posing a hazard to life or property (in this case, let it burn until emergency responders arrive).
2. If you do extinguish the fire, notify the customer and your Superintendent.
3. If you do *NOT* extinguish the fire:
 - a. Stop all job activities and protect life and property.
 - b. Secure and isolate the area.
 - c. Call 911 (begin documenting all conversations and activities).
 - d. Attend to any injuries.
 - e. Notify the customer and your Superintendent.
 - f. Move all vehicles away from the area to allow emergency responders better access, if the vehicles are not directly involved with the incident.
 - g. Wait for 911 emergency responders, a customer representative and your Superintendent to arrive at the scene to identify a plan for resolving the situation.
 - h. Assist in resolving the situation as directed.

Floods or Heavy Rain

1. Contact your supervisor to discuss leaving the jobsite before flash flooding occurs.
2. Plan routes to avoid common flood areas.
3. Stop and take an alternate route before driving through a flooded area.

Gas Line Strike

1. Upon striking a gas line:
 - a. Stop all job activities, turn off all equipment in the vicinity, and protect life and property.
 - b. Evacuate and secure the area.
 - c. Notify the customer and your Superintendent.
 - d. Coordinate the need to call 911 and/or evacuate nearby facilities with the customer.
 - e. Move all vehicles away from the area to allow emergency responders better access.

- f. Wait for emergency responders, a customer representative, and your Superintendent to arrive at the location.
- g. Assist in resolving the situation as directed.

Sewer Line Strike

1. If an employee damages a sewer line:
 - a. Notify your Superintendent, the Safety Quality & Compliance Coordinator/Safety & Compliance Specialist, and the utility company immediately.
 - b. Wear goggles & impervious clothing over all exposed skin before making any repairs.
 - c. Discard or thoroughly clean all PPE and wash skin when finished.
 - d. Notify the Safety Director of direct contact with sewage occurred.
 - e. The Safety Director will send any employees who had direct contact with sewage to the clinic for evaluation and offer them a Hepatitis B vaccination.

Tornados or Damaging Winds

1. Lead all crew members to shelter in a nearby structure or the lowest elevation within the area (i.e. home with a basement, interior room of local business, lay down in a ditch, etc.).
2. If life-threatening injury occurs:
 - a. Call 911.
 - b. Attend to any injuries.
3. Keep the crew away from down power lines, unstable structures, and other potential hazards.

Trench Collapse

1. If an employee is buried in a trench collapse:
 - a. Stop all job activities and turn off all equipment (NEVER attempt to dig buried coworkers out of a collapse with powered equipment!)
 - b. Secure and isolate the area, keeping everyone away from the trench.
 - c. Call 911 (begin documenting all conversations and activities).
 - d. Notify the customer and your Superintendent.
 - e. Move all vehicles away from the area to allow emergency responders better access.
 - f. When the 911 Emergency Responders arrive, tell them:
 - How many people were buried.
 - Their exact locations.
 - The depth of the trench.
 - The time of the collapse.
 - g. Assist the 911 emergency responders as instructed.

Workplace Violence

- 1) If an individual who could *potentially* become violent is seeking an employee:
 - a. Immediately and privately notify the employee.
 - b. Move the employee to a safe and secure area.
 - c. Inform the individual they are not available and ask to take a message.
 - d. Notify the police as soon as possible.
- 2) If a violent individual is confronting an employee:
 - a. Move all other employees to a remote and secure area.
 - b. Call 911.
 - c. A manager may attempt to diffuse the situation (as long as weapons are not involved).
 - d. If weapons are involved, cooperate with the individuals demands without hesitation.
 - e. Notify the Corporate Human Resources Director.

Facility Emergency Response Procedures

Fire or Explosion

1. Extinguish the fire with a nearby extinguisher (if the fire is small and you are trained).
2. If you do extinguish the fire, report the incident to your Supervisor.

3. If you do NOT extinguish the fire:
 - a. Instruct all employees to evacuate by voice and/or the intercom system (if available).
 - b. Evacuate the facility.
 - c. Gather in the designated rally point.
 - d. Company Emergency Responders will:
 - i. Call 911.
 - ii. Attend to any injuries.
 - iii. Facilitate a headcount to ensure everyone has evacuated.
 - iv. Inform 911 of any missing individuals and the last place they were seen.
 - e. Do not re-enter the facility until instructed by 911 emergency responders.

Damaging Winds or Tornados

1. Instruct all employees to seek shelter by voice and/or the intercom system (if available).
2. Seek shelter in the designated shelter area.
3. If life-threatening injury or severe damage occurs, Company Emergency Responders will:
 - a. Call 911.
 - b. Attend to any injuries.

Earthquake

1. If outside, stay away from all structures, buildings, poles and overhead power lines.
2. If inside, seek shelter under a desk or doorway immediately.
3. If life-threatening injury or severe damage occurs:
 - a. Evacuate the facility.
 - b. Look for and stay at least 50' away from any down power lines.
 - c. Gather at or near the designated rally point.
 - d. Company Emergency Responders will:
 - i. Call 911.
 - ii. Attend to any injuries.
 - e. Do not re-enter the facility until instructed by 911 emergency responders.

Workplace Violence

1. If an individual who could potentially become violent is seeking an employee:
 - a. Immediately and privately notify the employee.
 - b. Move the employee to a safe and secure area.
 - c. Inform the individual they are not available and ask to take a message.
 - d. Notify the Corporate Human Resources Director as soon as possible.
2. If a violent individual is confronting an employee:
 - a. Move all other employees to remote secure areas.
 - b. Call 911.
 - c. Notify the Corporate Human Resources Director.
 - d. A manager may attempt to diffuse the situation (as long as weapons are not involved).
 - e. If weapons are involved, cooperate with the individuals demands without hesitation.

Bulk Chemical Spills

1. If the spill does create a health hazard:
 - a. Follow the same procedures that you would for a fire that can NOT be extinguished.
 - b. Notify the Corporate Compliance Director.

Terrorism

1. If an act or threat of terrorism creates a hazard inside the facility (e.g. bomb threat):
 - a. Instruct all employees to evacuate by voice and/or the intercom system (if available).
 - b. Evacuate the facility.
 - c. Gather at the designated rally point.
 - d. Call 911.
 - e. Do not re-enter the facility until instructed by 911 emergency responders.

2. If an act or threat of terrorism creates a hazard outside the facility (e.g. toxic chemicals):
 - a. Instruct all employees to seek shelter by voice and/or the intercom system (if available).
 - b. Seek shelter in the designated shelter area.
 - c. Company Emergency Responders will:
 - i. Close and lock all doors and windows.
 - ii. Use duct tape to seal all door frames.
 - iii. Communicate with 911 and/or the local fire service to determine next steps.
 - d. Do not leave the facility until instructed by 911 or the local fire service.

Emergency Warning Devices

If an emergency situation occurs, Company Emergency Responders will alert employees by verbal notification. When present or working in a large facility this may be done using an intercom system. When scattered on jobsites this may be done by using a vehicle or air horn. When using a horn as the notification system, the following warnings shall be used:

Repeated Short Blasts

Repeated short blasts will be used in the event of a fire, smoke build up, hazardous chemical spill, bomb threat, or explosion. This signal will be used to inform employees to evacuate immediately and convene at the designated rally point. Employees will not be permitted to re-enter the evacuated area until given the "All Clear" order.

One Continuous Blast

One continuous blast will be used in the event of a tornado, flood or severe storm. This signal will be used to warn employees to immediately seek shelter in the designated shelter area and quietly await further instruction.

Superintendent Response Procedures

Upon initial notification of an emergency situation:

- Ensure that the crew has protected life and property.
- Notify the Regional VP/Manager
- Notify the Safety Director and Corporate Risk Manager.
- Arrive at the scene within 30-minutes or assign a replacement.
- Meet with any 911 emergency responders, customer representatives and the Foreman to establish a plan for resolving the situation quickly and safely.
- Assist in resolving the situation.
- Notify and assist family members of injured employees as instructed by this plan.
- Work with the Safety Director to conduct a formal investigation of the incident by completing the appropriate form, conducting formal interviews with all involved employees and witnesses, making drawings, and taking pictures/videos of the area, damage and measurements.
- Forward all gathered information to the Corporate Risk Manager within 24-hours.
- Participate in the Root Cause Investigation process.

Media & Family Relations

Media Relations

1. If an incident occurs that results in media involvement:
 - a. Inform the customer and your Superintendent of their involvement immediately.
 - b. Treat the media with respect and make sure they maintain a safe distance from the area.
 - c. Direct any inquiries or requests for interviews to “a designated company representative”.
 - d. The designated representative is Casey Clark of Miller Pipeline Corporate Communications in Indianapolis, Indiana. Casey Clark can be reached at 317-295-6406.
 - e. Avoid making any “No Comment” or “Off-the-Record” statements.
2. The Superintendent and/or Regional VP will:
 - a. Contact the customer to identify an individual(s) who will represent the company(s).
 - b. Brief the designated representative of the situation.
 - c. Maintain constant communication with the designated representative.
3. The designated representative will:
 - a. Privately meet with all employees upon arriving at the scene to calm everyone, establish themselves as the only media contact, and gather the facts.
 - b. Release our initial statement as, “We are taking this situation very seriously and are in the process of conducting a formal investigation. When we have accurate information, we will pass it along to you. My contact information is...”
 - c. Remain accessible to reporters and respect their deadlines.
 - d. Escort media representatives in and out of the area.
 - e. Answer questions directly and clearly.
 - f. Avoid speculating any details, exaggerating or minimizing the severity of the incident, covering up facts, or placing blame.
 - g. Document all conversations with the media.
 - h. Provide all media sources equal access to information we release.

Accommodating Families

1. If a life-threatening injury occurs, the Superintendent will:
 - a. Notify the employee’s spouse or closest family member and give them the name/address of the treatment facility the injured employee will be taken to.
 - b. Immediately and privately meet with any family members who arrive at the scene to:
 - Establish themselves as the person supervising the scene.
 - Inform them of all known facts about the incident.
 - Assure them that we are doing everything we can to address/investigate the situation and will keep them informed.
 - Introduce them to the company representative who is handling media relations and request that all media communication be channeled through them.
 - Give them contact information for both individuals and gather theirs as well.
 - Deliver any new facts to them first.
 - Do everything possible to comfort them while at the scene.

Training Requirements

All employees will be trained on the contents of this plan during Safety Orientation.

Environmental Programs

Purpose

This written Environmental Program and Policy has been developed to address responsibility of Miller Pipeline's operations to reduce the negative impact on the air, water, and land.

As part of this program and policy, it is the Company's intent to comply with the requirements of Federal, State, and local regulations.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

Safety Director

Ensure that this policy is completely implemented and evaluated on an annual basis. The Environmental Program and Policy is kept at Miller Pipeline's Headquarters, located at 8850 Crawfordsville Road, Indianapolis, IN 46234.

Employees

Follow all guidelines in this policy.

Procedures

Environmental and Social Impact

In addition to those requirements defined by government regulation, Miller Pipeline Corporation will assess what impact the active work project(s) may have on the environment, as well as society in whole, through prudent awareness and judgment associated with the level of exposure and category of work being performed. Examples of such work categories could be, but not limited to:

- Working within Nuclear Power Plants;
- Working inside the perimeter of hazardous liquid pipeline operations such as gasoline, jet fuel, or diesel fuel refineries;
- Working on existing pipeline which may contain various levels of PCB's;
- Working in paint spraying operations;
- Working in caustic, flammable, explosive, or reactive areas.
- Working with hazardous substances

These work assessments shall review the applicable criteria associated with each individual work category and shall dictate the level of safety and preventative activity necessary to assure no negative environmental and/or social impact.

Affected Persons

All personnel operating in field environments, as well as the maintenance, fabrication, and Encapsal shipping operations are affected by this plan and policy.

Each employee affected by this Environmental Program and Policy has the obligation, right, and responsibility to notify the Environmental Program and Policy Administrator of any suggestions for improvement of the processes Miller Pipeline utilizes within this Program and Policy.

Additionally, each affected employee is encouraged to share their ideas and thoughts on how Miller Pipeline Corporation can reduce the negative impact of the company's operations.

Environmental Performance Accountability

Each Department Manager shall be responsible to assure that the Superintendents, Foremen, and Labor employees working in their area of responsibility are aware of the impact their jobs may have on the environment, and to recognize those cases when special measures must be taken to assure the Company follows sound environmental practices, as well as regulatory requirements.

Plan Evaluation

It is inherent that problems may occasionally arise in this Environmental Program and Policy. Although we may not be able to eliminate all problems, we try to eliminate as many problems as possible to improve employee protection and encourage employee safe practices. By having our plan administrator thoroughly evaluate and, as necessary, revise our Environmental Program and Policy, we can eliminate problems effectively.

The plan evaluation, performed annually by our plan administrator, will involve the following:

- Assuring the appropriate individuals have been trained;
- Assure there have been no non-compliance matters with any regulatory agency;
- Assure any containment problems have been appropriately handled and rectified;
- Notifications have been handled appropriately;
- Safe work practices have been implemented.

INADVERTENT RETURNS CONTINGENCY PLAN (IR)

Directional bore operations have a potential to release drilling fluids into the surface environment through inadvertent returns. (An inadvertent return is the condition where drilling mud is released through fractured bedrock into the surrounding rock and sand and travels toward the surface.) Because drilling muds consist largely of a bentonite clay-water mixture, they are not classified as toxic or hazardous substances. However, if it is released into water bodies, bentonite has the potential to adversely impact fish and invertebrates.

While drilling fluid, seepage associated with an inadvertent return is most likely to occur near the bore entry and exit points. Where the drill head is shallow, inadvertent returns can occur in any location along a directional bore. This Inadvertent Returns Contingency Plan (IR) establishes operational procedures and responsibilities for the prevention, containment, and cleanup of inadvertent returns associated with the proposed directional drilling utility project of Miller Pipeline. All personnel and Sub-Contractors responsible for the work must adhere to this plan during the directional drilling process.

The specific objectives of this plan are to:

- o Minimize the potential for an inadvertent return associated with directional drilling activities;
- o Provide for the timely detection of inadvertent returns;
- o Protect the environmentally sensitive riverbed and associated riparian vegetation;
- o Ensure an organized, timely, and "minimum-impact" response in the event of inadvertent returns and release of drilling bentonite; and
- o Ensure that all appropriate notifications are made immediately to the customer, management, and safety personnel.

Description of Work

The proposed project consists of (explain work task in detail to crew members):

Drilling operations will be halted by the drill rig operators immediately upon detection of a drop in drilling pressure or other evidence of inadvertent returns. The clean-up of all spills shall begin immediately. Management & the Safety Department shall be notified immediately of any spills and shall be consulted regarding clean-up procedures. A spill kit shall be on-site and used if an inadvertent return occurs. A vacuum truck and containment materials, such as straw bales, shall also be on-site prior to and during all operations. The Site Supervisor will be immediately notified. In the event of inadvertent returns, the on-site foreman/supervisor will conduct an evaluation of the situation and direct recommended mitigation actions, based on the following guidelines:

- If the inadvertent returns are minor, easily contained, has not reached the surface and is not threatening sensitive resources, drilling operations may resume after use of a leak stopping compound or redirection of the bore;
- If the inadvertent returns have reached the surface, any material contaminated with Bentonite shall be removed by hand to a depth of 2-feet, contained and properly disposed of, as required by law. The drilling contractor shall be responsible for ensuring that the bentonite is either properly disposed of at an approved disposal facility or properly recycled in an approved manner. The Site Supervisor shall notify and take any necessary follow-up response actions in coordination with agency representatives. The Site Supervisor will coordinate the mobilization of equipment stored at off-site locations (e.g., vacuum trucks) on an as needed basis;

Site Supervisor/Foremen Responsibilities

The Site Supervisor/Foremen has overall responsibility for implementing this IR. The Site Supervisor/Foremen will ensure that all employees are trained prior to all drilling. The Site

Supervisor/Foremen shall be notified immediately when an inadvertent return is detected. The Site Supervisor/Foremen will be responsible for ensuring that the safety department is aware of the inadvertent returns, coordinating personnel, response, cleanup, regulatory agency notification, and coordination to ensure proper clean-up, disposal of recovered material and timely reporting of the incident. The Site Supervisor/Foremen shall ensure all waste materials are properly containerized, labeled, and removed from the site to an approved disposal facility by personnel experienced in the removal, transport, and disposal of drilling mud.

The Site Supervisor/Foremen shall be familiar with all aspects of the drilling activity, the contents of this Inadvertent Returns Contingency Plan and the conditions of approval under which the activity is permitted to take place. The Site Supervisor/Foremen shall have the authority to stop work and commit the resources (personnel and equipment) necessary to implement this plan. The Site Supervisor/Foremen shall assure that a copy of this plan is available (onsite) and accessible to all construction personnel. The Site Supervisor/Foremen shall ensure that all workers are properly trained and familiar with the necessary procedures for response to an inadvertent return, prior to commencement of drilling operations.

Equipment

The Site Supervisor shall ensure that:

- o All equipment and vehicles are being checked and maintained daily to prevent leaks of hazardous materials;
- o Spill kits and spill containment materials are available on-site at all times and that the equipment is in good working order;
- o Equipment required to contain and clean up an inadvertent returns release will either be available at the work site or readily available at an offsite location within 15-minutes of the bore site; and
- o If the equipment is required to be operated near a riverbed, absorbent pads and plastic sheeting for placement beneath motorized equipment shall be used to protect the riverbed from engine fluids;

Drilling Procedures

The following procedures shall be followed each day, prior to the start of work. The Inadvertent Returns Contingency Plan shall be available on-site during all construction. The Site Supervisor/Foremen shall be on-site at any time that drilling is occurring or is planned to occur. The Site Supervisor/Foremen shall ensure that a Job Briefing meeting is held at the start of each day of drilling to review the appropriate procedures to be followed in case of an inadvertent return. Questions shall be answered, and clarification given on any point over which the drilling crew or other project staff has concerns.

Drilling pressures shall be closely monitored, so they do not exceed those needed to penetrate the formation. Pressure levels shall be monitored randomly by the operator. Pressure levels shall be set at a minimum level to prevent inadvertent returns. During the pilot bore, maintain the drilled annulus. Cutters and reamers will be pulled back into previously drilled sections after each new joint of pipe are added.

Exit and entry pits shall be enclosed by silt fences and straw. A spill kit shall be on-site and used if an inadvertent return occurs. A vacuum truck shall be readily available on-site prior to and during all drilling operations. Containment materials (Straw, silt fencing, sandbags, inadvertent returns spill kits, etc.) shall be staged on-site at location where they are readily available and easily mobilized for immediate use in the event of an accidental release of drilling mud (inadvertent returns). If necessary, barriers (straw bales or sedimentation fences) between the bore site and the edge of the water source shall be constructed, prior to drilling, to prevent released bentonite material from reaching the water.

Once the drill rig is in place, and drilling begins, the drill operator shall stop work whenever the pressure in the drill rig drops, or there is a lack of returns in the entrance pit. At this time, the Site Supervisor/Foremen shall be informed of the potential inadvertent returns. The Site Supervisor/Foremen and the drill rig operator(s) shall work to coordinate the likely location of the inadvertent returns. The location of the inadvertent returns shall be recorded, and notes made on the location and measures taken to address the concern. The following subsections shall be adhered to when addressing an inadvertent returns situation.

Water containing mud, silt, bentonite, or other pollutants from equipment washing or other activities, shall not be allowed to enter a lake, flowing stream, or any other water source. The Bentonite used in the drilling process shall be either disposed of at an approved disposal facility or recycled in an approved manner. Other construction materials and wastes shall be recycled, or disposed of, as appropriate.

Vac-Truck

A vacuum truck shall be staged at a location from which it can be mobilized and relocated so that any place along with the drill shot, can be reached by the apparatus, within 10 minutes of inadvertent returns.

Field Response to Inadvertent Returns Occurrence

The response of the field crew to an inadvertent returns release shall be immediate and in accordance with procedures identified in this Plan. All appropriate emergency actions that do not pose additional threats to sensitive resources will be taken, as follows:

- a. Directional boring will stop immediately;
- b. The bore stem will be pulled back to relieve pressure on inadvertent returns;
- c. The Site Supervisor/Foremen will be notified to ensure that management and the safety department is notified, adequate response actions are taken and notifications made;
- d. The Site Supervisor/Foremen shall evaluate the situation and recommend the type and level of response warranted, including the level of notification required;
- e. If the inadvertent returns are minor, easily contained, has not reached the surface, and is not threatening sensitive resources, a leak stopping compound shall be used to block the inadvertent returns. If the use of leak stopping compound is not fully successful, the bore stem shall be redirected to a new location along the desired drill path where an inadvertent return has not occurred;
- f. If the inadvertent returns have reached the surface, any material contaminated with Bentonite shall be removed by hand, to a depth of 2-feet, contained and properly disposed of, as required by law. A dike or berm may be constructed around the inadvertent returns to entrap released drilling fluid, if necessary. Clean sand shall be placed, and the area returned to pre-project contours; and
- g. If an inadvertent return occurs, reaches the surface, and becomes widespread, the Site Supervisor/Foremen shall authorize a readily accessible vacuum truck and bulldozer stored off-site to be mobilized. The vacuum truck may be either positioned at either end of the line of the drill so that the inadvertent returns can be reached by crews on foot, or may be pulled by a bulldozer so that contaminated soils can be vacuumed up.

Response Close-out Procedures

When the release has been contained and cleaned up, response closeout activities will be conducted at the direction of the Site Supervisor/Foremen and shall include the following:

- The recovered drilling fluid will either be recycled or hauled to an approved facility for disposal. No recovered drilling fluids will be discharged into streams, storm drains or any other water source;
- All inadvertent returns excavation and clean-up sites will be returned to pre-project contours using clean fill, as necessary; and
- All containment measures (fiber rolls, straw bale, etc.) will be removed unless otherwise specified by the Site Supervisor/Foremen.

Construction Re-start

For small releases not requiring external notification, drilling may continue, if 100 percent containment is achieved through the use of a leak stopping compound or redirection of the bore and the clean-up crew remains at the inadvertent returns location throughout the construction period.

For releases requiring external notification and/or other agencies, construction activities will not restart without prior approval from the safety department.

Bore Abandonment

Abandonment of the bore will only be required when all efforts to control the inadvertent returns within the existing directional bore have failed.

Notification

In the event of inadvertent returns that reaches a water source, the Site Supervisor/Foremen will notify safety department so they can notify the appropriate resource agencies. All agency notifications will occur within 24 hours, and proper documentation will be accomplished in a timely and complete manner. The following information will be provided:

1. Name and telephone number of person reporting;
2. Location of the release;
3. Date and time of release;
4. Type and quantity estimated size of release;
5. How the release occurred;
6. The type of activity that was occurring around the area of the inadvertent returns;
7. Description of any sensitive areas, and their location about the inadvertent returns;
8. Description of the methods used to clean up or secure the site; and
9. Listing of the current permits obtained for the project.

Communicating with Regulatory Agency Personnel

All employees and subcontractors will adhere to the following protocols when permitting Regulatory Agency Personnel to arrive on site. Regulatory Agency Personnel will be required to comply with appropriate safety rules. Only the Site Supervisor/Foremen and the safety department are to coordinate communication with Regulatory Agency Personnel.

Documentation

The Site Supervisor/Foremen shall record the inadvertent returns event in his or her daily log. The log will include the following: Details on the release event, including an estimate of the amount of bentonite, released, the location and time of release, the size of the area impacted, and the success of the clean-up action. The log report shall also include the: Name and telephone number of person reporting; Date, How the release occurred; The type of activity that was occurring around the area of the free-out: Description of any sensitive areas, and their location in relation to the inadvertent returns: Description of the methods used to clean up or secure the site; and a listing of the current permits obtained for the project.

Project Completion and Clean-up

All materials and any rubbish-construction debris shall be removed from the construction zone at the end of each workday;

Sump pits at bore entry and exits will be filled and returned to natural grade; and

All protective measures (fiber rolls, straw bale, silt fence, etc.) will be removed unless otherwise specified by the Site Supervisor/Foremen.

Erosion Control and Wetland Protection

Erosion Control

Miller Pipeline utilizes effective management practices to effectively minimize erosion and sedimentation at work sites. These practices are in partnership with the operators engineering team and project declarations and requirements. Various practices are utilized, based on specific site dynamics. Examples of these practices can include, but are not limited to, the utilization of such measures as incorporating silt fencing, filter soxx, compost, turf/sod anchoring, and damming with by-pass measures instituted.

Measures which Miller Pipeline utilizes are directly relational to the customer requirements for the projects Miller Pipeline is working for. As such, it is impractical, and impossible to list each specific situation and the remedial/proactive measures Miller Pipeline institutes.

Sedimentation pollution measures are also addressed in the application of these erosion control measures implemented per the site-specific needs. These needs are generally based on the presence of creek beds, water ways, wetlands, topography, elevation, and landscape.

Sensitive Environmental Areas

Miller Pipeline utilizes effective management practices to effectively minimize any negative impact to sensitive environmental areas at work sites. These practices are in partnership with the operators engineering team and project declarations and requirements. Various practices are utilized, based on specific site dynamics.

Examples of these practices can include, but are not limited to, the utilization of such measures as incorporating water way bypass during at the location of the work environment disturbances, minimization of equipment usage, work hours, working within the state and local Clean Streams laws, other ground attentive measures to minimize or eliminate negative impact to such sensitive environmental areas.

Spill Prevention and Response

Chemical substances shall be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals shall be kept in closed containers and stored so they are not exposed to storm water.

A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies will be easily accessible when required, and considerations will be made for both the type and quantity of materials.

Areas where chemicals may be used or stored shall be well maintained with housekeeping best management practices to prevent spills. This includes, but is not limited to, clean and organized storage, labeling, and secondary containment where necessary.

All employees handling spills must first assess the hazards of the spilled material & don the appropriate PPE, which could include: goggles, face shields, impervious boots or gloves, aprons, & possibly respiratory protection.

If no fire present, check the area for potential hazards such as electrical cords or wires near the spill, or obstacles in the path of the emergency response team. Check for injuries and notify emergency medical assistance.

If a fire is present, assume that the vapors are toxic. Evacuate and call for help.

If no emergency, waste from a chemical spill clean-up must be packaged, labeled, and properly disposed of in accordance with all good environmental practices. The SDS for the chemical spilled will contain information regarding neutralizing and clean up.

All chemical spills, corrective measures, and cleanup methods must be documented in writing. The report should be written either by the Manager or Supervisor in whose area of responsibility the spill occurred. The original report must be forwarded to the Safety Director.

Mercury Regulators

Many of our customers still have mercury regulators in service. Mercury regulators were installed in new homes until 1967. Here are a few things to note while on the job:

- Mercury spills are **preventable** when the regulators are removed by trained & qualified personnel.
- If you are **unsure** if it's a mercury regulator, stop and reach out for a **second opinion**.
- Remember to do a thorough walk-through of the area before meter move-outs/removing regulators.



What is Mercury?

Elemental Mercury is a **silvery liquid** substance at room temperature. When spilled from a regulator, it forms beads or droplets. These droplets can emit dangerous vapors, and the vapors are odorless and colorless. Breathing or inhaling these vapors can be harmful to your health.

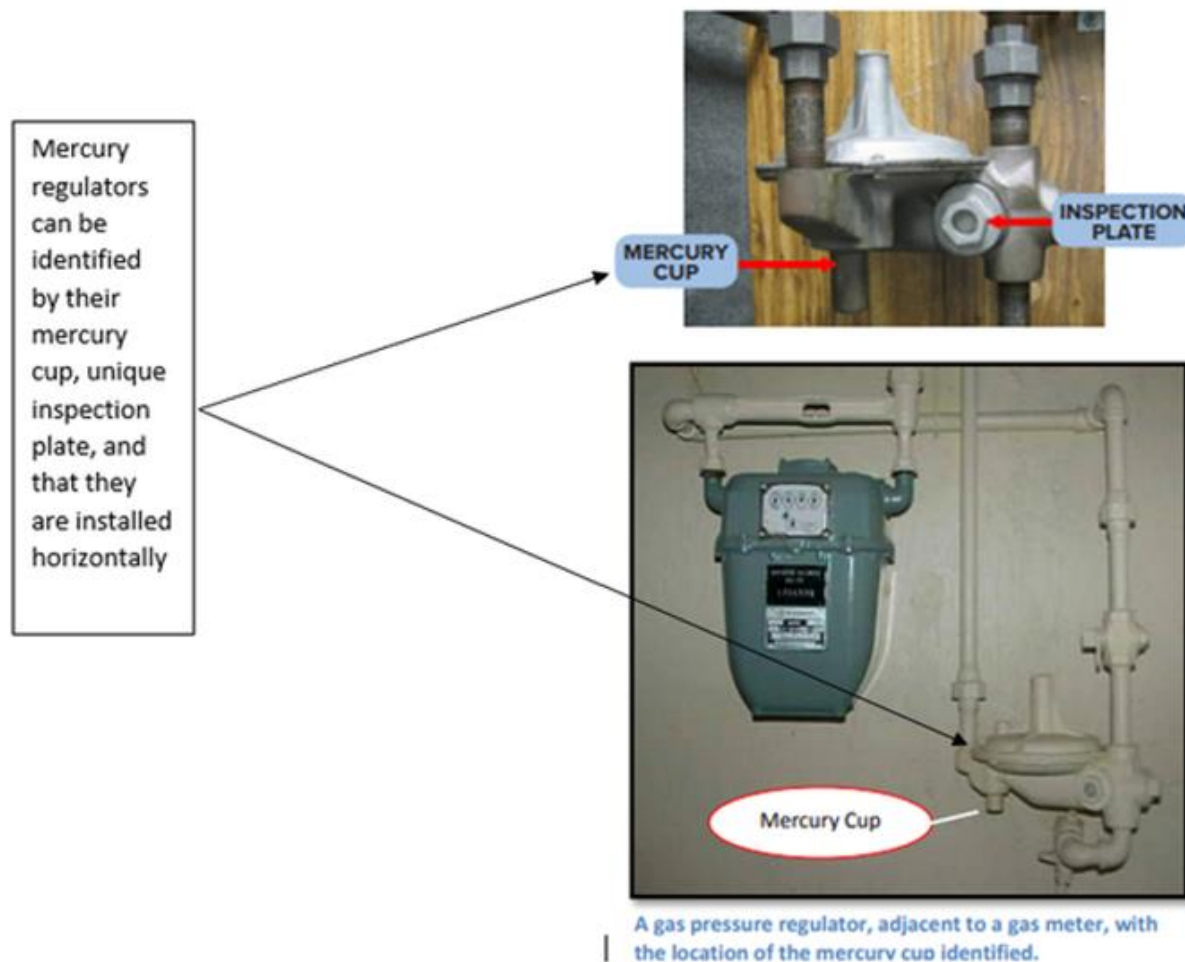
Is Mercury Safe to Touch?

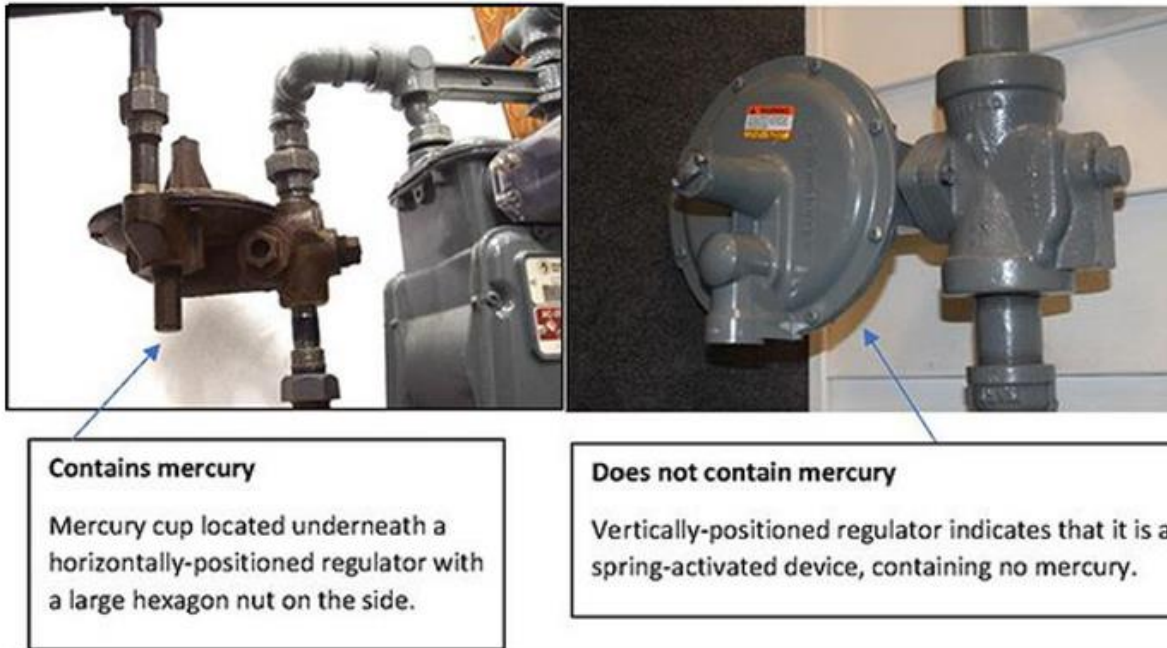
No, you **never** want to touch Mercury. Even though inhalation is a greater risk than skin contact, mercury can still be highly hazardous to touch depending on exposure levels and personal factors.

Identifying a Mercury Regulator

There are many ways to identify a mercury regulator. They can be identified by their mercury cup, unique inspection plate, and horizontal installation (see Fig. 3 below). Here are some other things to look for when it comes to mercury regulators:

- Have customer procedures/visuals **on-site** for identifying mercury regulators;
- Inspect service records and pay attention to **dates** (if 1967 or before, possibility of mercury regulator exists);
- Sometimes mercury regulators were switched out, but **vent lines** may still contain mercury.
- Know **customer procedures** for vent lines as well during meter move-outs;





Spill Clean Up

Mercury is hazardous in any quantity and requires specialized training/PPE to clean up. A spill must be reported when it occurs. Evacuate the building immediately and then report the spill.

Miller Pipeline will work with the client in the event of a spill to effectively mitigate a spill and associated hazards. Miller Pipeline will not be responsible for any disposal of mercury or other hazardous materials.

Training Requirements

All employees who perform environmental related field operations, and/or maintenance, fabrication, and Encaseal shipping operations, will have successfully completed a training program under the Environmental Program and Policy. This includes all new employees operating within this criterion, regardless of claimed previous experience.

The Environmental Program and Policy Administrator will identify trainees and make arrangements with department management to schedule training. The Administrator will identify those existing employees who need retraining. The Company is responsible for conducting training, however training may be done by an outside company.

The company training program will include, but not be limited to:

- Spill/release containment.
- Product loss.
- Employee and public protection.
- Appropriate notification.
- General obligation to work safely.

Prior to the start of construction, the Site Supervisor/Foremen shall ensure that the crew members receive training in the following:

- The provisions of the Inadvertent Returns Contingency Plan, equipment maintenance and site-specific permit and monitoring requirements;
- Inspection procedures for release prevention and containment equipment and materials;
- Contractor/crew obligation to immediately stop the drilling operation upon first evidence of the occurrence of inadvertent returns and to immediately report any inadvertent returns releases;
- Contractor/crew member responsibilities in the event of a release;
- Operation of release prevention and control equipment and the location of release control materials, as necessary and appropriate; and
- Protocols for communication with agency representatives who might be on-site during the clean-up effort.

Extreme Temperatures

Purpose

Identify hazards that relate to working in naturally hazardous environments & prescribe precautions that employees should follow in order to avoid such hazards.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

Foreman

Implement all precautions identified in this plan.

Procedures

Heat Illness Prevention

Employees shall take basic precautions to avoid heat illnesses whenever working in environments that have a heat index of 91° F or higher. The extent of these precautions should get more aggressive when the heat rises above 103°F. Extreme precautions must be taken when it rises above 115° F.

Some basic ways that employees can avoid heat stress include: dressing in light colored clothing; applying sunscreen to all exposed skin; consuming 8-ounces of water or sports drink every 30-minutes; avoiding caffeinated drinks and/or alcoholic beverages 24-hours before working in extreme heat; take physical work factors that can contribute to heat related illnesses into consideration before performing a task; taking short breaks in the shade as needed; and utilizing job rotation with coworkers when performing strenuous tasks in hot environments.

Some basic ways that Foremen can help their crew members avoid heat stress include: constantly monitor employees for signs/symptoms of heat exhaustion; continuously remind crew members to stay hydrated; mandate frequent breaks; and take personal factors into consideration before assigning a task where there is a possibility of a heat related illness occurring.

Cold Illness Prevention

Employees shall take precautions to avoid cold stress injuries & illnesses whenever working in environments with temperatures below 32° F.

Some basic ways that employees can avoid cold stress include: dressing in warm layers; taking a change of clothing to work; wearing waterproof clothing/boots when necessary to prevent skin from getting wet; drying skin whenever it does get wet; and taking frequent breaks in warm/heated areas.

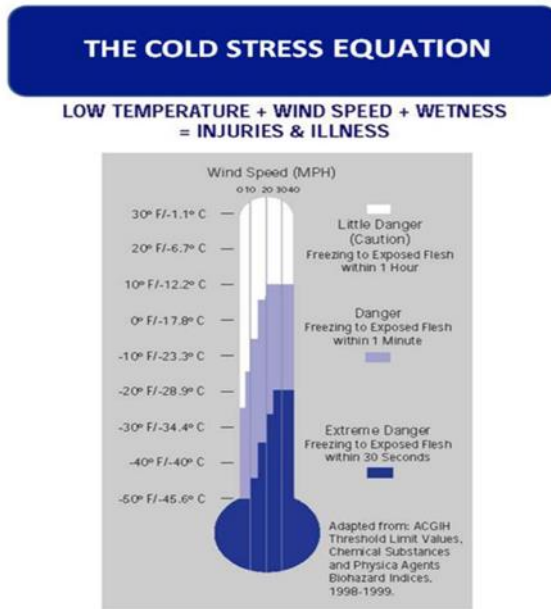
Some basic ways that Foremen can help their crew members avoid cold stress include: constantly monitor employees for signs/symptoms of cold stress; make sure that any exposed skin that gets wet is dried immediately; and mandate frequent breaks in warm areas.

OSHA Reference

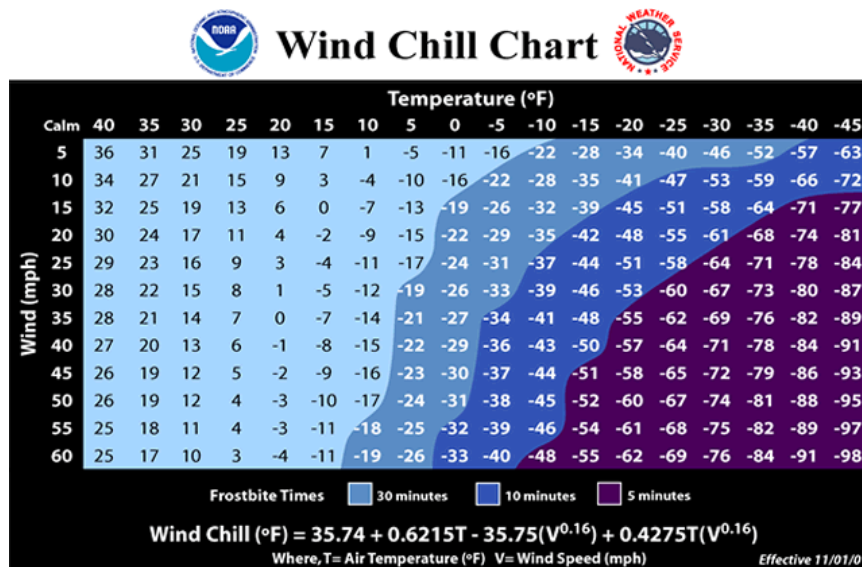
OSHA-NIOSH Heat Safety Too App is utilized as a useful resource for planning outdoor work activities based on how hot it feels throughout the day. It has a real-time heat index and hourly forecasts, occupational safety and health recommendations from OSHA and NIOSH, and precautionary measures for heat stress prevention.

Cold Stress Equation

OSHA has incorporated information obtained from the American Conference of Governmental Industrial Hygienists (ACGIH) threshold limit values into the Cold Stress Equation. As the temperature decreases and/or the wind speed increases, the potential for cold stress related illnesses and injuries increases.



Wind Chill Chart



Training Requirements

All employees will be educated on the precautions listed in this plan and how to recognize the hazards of working in extreme temperatures.

Fall Protection

Purpose

Identify the proper procedures for controlling falls, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline.

Definitions

Anchorage - Means a secure point of attachment for lifelines, lanyards or deceleration devices.

Body Harness - Means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, and chest with means for attaching it to other components of personal fall arrest system.

Deceleration Device - Means any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

Lanyard - Means a flexible line of rope, wire, or strap, which generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

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

Personal Fall Arrest System - Means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these. As of January 1, 1998, the use of a body belt for fall arrest is prohibited.

Rope Grab - Means a deceleration device that travels on a lifeline and automatically, by friction, engages the lifeline and locks to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

Safety Monitoring System - Means a safety system in which a designated individual is responsible for recognizing and warning employees of fall hazards.

Toeboard - Means a low protective barrier that will prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

Unprotected Sides and Edges - Means any side or edge (except at entrances to points of access) of a walking/working surface, (i.e., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches [1.0 m] high.)

Walking/Working Surfaces - Means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, form-work and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

Floor Hole: Any opening measuring less than 12 inches but more than 1 inch at its least dimension.

Floor Opening: Any opening measuring more than 12 inches at its least dimension.

Wall Hole: Any opening less than 30 inches but more than 1 inch high of unrestricted width.

Wall Opening: Any opening at least 30 inches high and 18 inches wide.

Standard Railing: Vertical barrier to protect and prevent persons from falling into, through or from wall openings, ramps, platform or other areas where a fall hazard exists.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all levels of employees.

Foremen

Enforce the guidelines addressed in this policy.

Contractors

Ensure that their Foremen are trained and educated on their company's fall protection policy and procedures.

Provide for prompt rescue of their employees in the event of a fall or will assure that employees are able to rescue themselves.

Procedures

Pre-Project Planning

A systematic evaluation of the project site, and potential fall exposures will be made prior to construction or demolition operations.

Pre project planning for safety will be performed in conjunction with Regional and Corporate Safety Personnel, the project management team, and other appropriate experts.

Some excavation edges on jobsites may not be visible. In these instances, the excavation edge should be protected by fences or barricades when excavation is 6 feet or greater in depth. In addition, walls, pits, shafts, and similar excavations six feet in depth or more will be guarded to prevent anyone falling into them by fences, barricades or covers.

Any time a personal arrest system is utilized, a site-specific rescue plan must be put in place, which could include the use of a mobile elevated work platform, ladder or other device.

General Fall Protection

The two types of fall protection systems that Miller Pipeline's employees will use are guardrail systems and personal fall arrest systems. When purchasing equipment and raw materials for use in fall protection systems applicable ANSI & ASTM requirements should be met.

One of the types of fall protection systems will be used whenever an employee is exposed to a fall of six feet or more.

Foremen will implement the most suitable form of fall protection systems for each project, task, and employee. This implementation will occur prior to beginning work.

Fall Protection Systems

Guardrail Systems

The top edge of the guardrail will be 42 inches above the walking/working level.

Mid-rails will be installed at a height halfway between the top edge of the guardrail system and the walking/working surface.

Guardrail systems will be capable of withstanding without failure, a force of at least 200 pounds in any outward or downward direction, at any point along the top edge.

When the 200-pound test load is applied in a downward direction, the top edge of the guardrail will not deflect to a height less than 39 inches above the walking/working level.

Mid-rails, screens, mesh, intermediate vertical members, solid panels, and equivalent structural members will be capable of withstanding, without failure, a force of at least 150 pounds applied in any downward or outward direction at any point along the mid-rail or other member.

Guardrail systems will be so surfaced as to prevent injury to an employee from punctures or lacerations, and to prevent snagging of clothing.

If wire rope is used for top rails, it will be flagged at 6-foot intervals with high-visibility material.

When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section will be placed across the access opening between guardrail sections when hoisting operations are not taking place.

When guardrail systems are placed around holes they will be erected on all unprotected sides or edges of the hole. If the hole is an access point, a gate will be provided, or the guardrails will be offset so that employees cannot walk directly into the hole.

Personal Fall Arrest Systems

Connectors will be drop forged, pressed or formed steel, or made of equivalent materials.

Connectors will have a corrosion-resistant finish, and all surfaces and edges will be smooth to prevent damage to interfacing parts of the system.

Dee-rings and snaphooks will be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.

Snaphooks will be sized to be compatible with the member to whom they are connected to prevent unintentional disengagement of the snaphook by depression of the snaphook keeper by the connected member, or will be a locking type snaphook designed and used to prevent disengagement of the snaphook by the contact of the snaphook keeper by the connected member.

Snaphooks will be of the locking type.

On suspended scaffolds or similar work platforms with horizontal lifelines that may become vertical lifelines, the devices used to connect to a horizontal lifeline will be capable of locking in both directions on the lifeline.

Horizontal lifelines will be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.

When vertical lifelines are used, each employee will be attached to a separate lifeline.

Lifelines will be protected against being cut or abraded.

Self-retracting lifelines and lanyards, which automatically limit free fall distance to 2 feet or less, will be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.

Self-retracting lifelines and lanyards which do not limit free fall distance to two feet or less, ripstitch lanyards, and tearing and deforming lanyards will be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.

Lanyards will be capable of beginning fall arrest at six feet or less from the employees work surface. Once the lanyard begins fall arrest, it will complete the arrest within 3½ feet. Therefore, an employee will never be allowed to drop more than 9½ feet total. Fall arrest systems will be of adequate length to prohibit employees from contacting a lower level, or equipment below.

Ropes and straps (webbing) used in lanyards, lifelines, and strength components of body harnesses will be made from synthetic fibers.

Anchorage used for attachment of personal fall arrest equipment will be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached, or will be designed, installed, and used as part of a complete personal fall arrest system which maintains a safety factor of at least two, as well as under the supervision of a qualified person.

The attachment point of the body harness will be located between the wearer's shoulder blades.

Body harnesses and components will be used only for employee protection (as part of a personal fall arrest system or positioning device system) and not to hoist materials.

Personal fall arrest systems and components subjected to impact loading will be immediately removed from service and will not be used again for employee protection until inspected and determined by the Foreman to be undamaged and suitable for reuse. The Foreman will refer to the manufacturer's guidelines when making this determination.

Personal fall arrest systems will be inspected prior to each use for wear, damage and other deterioration, and defective components will be removed from service.

Personal fall arrest systems will not be attached to guardrail systems unless the guardrail is designed for such use, nor will they be attached to hoists.

When a personal fall arrest system is used at hoist areas, it will be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

Positioning Device Systems

Positioning devices will be rigged such that an employee cannot free fall more than 2 feet.

Positioning devices will be secured to an anchorage capable of supporting at least twice the potential impact load of an employee's fall or 3,000 pounds, whichever is greater.

Connectors will be drop forged, pressed or formed steel, or made of equivalent materials.

Connectors will have a corrosion-resistant finish, and all surfaces and edges will be smooth to prevent damage to interfacing parts of this system.

Connecting assemblies will have a minimum tensile strength of 5,000 pounds.

Dee-rings and snaphooks will be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.

Only locking type snaphooks will be used.

Positioning device systems will be inspected prior to each use for wear, damage, and other deterioration and defective components will be removed from service.

Covers

Covers will be capable of supporting at least twice the weight of the anticipated maximum load that may be imposed on the cover at any one time.

All covers will be secured when installed to prevent accidental displacement by the wind, equipment, or employees.

All covers will be marked with the word "HOLE" or "COVER" to provide warning of the hazard.

All wall or floor openings will be covered.

Hatchways will be guarded with hinged cover and standard railings with only one exposed side. The hinged cover will be closed, or side will be guarded with removable standard railings.

Chutes will be guarded with removable standard railings and toe boards. All standard railings will be kept in place when the chute is not in use.

Skylights will be guarded with fixed standard railings on all sides, or provided adequate covers.

Pits and trap doors will be guarded with floor opening covers or standard railings on all exposed sides by removable standard railings.

Dropped Object Prevention

As required by this policy under “Guardrail Systems”, all railing systems used as a form of fall protection will be equipped with a mid-rail, which can also help to prevent objects from falling.

Toe-boards will be installed on all overhead work surfaces including aerial lifts and scaffolding. All toe-boards will be at least 3.5” high, capable of withstanding 50-pounds of force, and secured within 1/8-inch from the work surface.

The area below an elevated work surface shall be barricaded with red danger tape to prevent unauthorized entry and danger signs shall be posted that read “Danger – Overhead Falling Objects”.

If the area below an elevated work platform cannot be fully barricaded, then all tools must be tethered and screens shall be installed along the perimeter of the overhead work surface to better prevent dropped objects. If our customers exceed this policy by requiring tools to be tethered and/or screens to be installed at all times (even with the area below barricaded) than our employees shall comply.

Tools and equipment that is lifted or lowered from overhead work platforms must be done in a manner that prevents the tools/equipment from being accidentally dropped.

All materials present on an overhead work platform must be properly secured in order to prevent them from being knocked-off, especially when workers are present on the platform or the platform is being transported.

The elements of this policy will be reviewed with employees during Orientation and audited when safety inspections are conducted.

Training Requirements

All employees who are expected to work at levels of six feet or more must be trained and certified by Miller Pipeline before performing this work. Written certification records must be maintained showing the following:

- 1) Who was trained, when, dates of training
- 2) Signature of person providing training & date employer determined training was deemed adequate.

Training shall enable each employee to recognize the hazards of falling & the procedures to follow to minimize these hazards. All employees will be trained on the general requirements for fall protection during Safety Orientation. Retraining shall be provided when there are deficiencies in training, when work practices are changed or when fall protection equipment is modified. Also, all employees who do not comply with the requirements of this policy will be issued disciplinary action and will be re-trained.

Fatigue Management

Purpose

Identify how to recognize fatigue, how to control fatigue and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This policy applies to all Miller Pipeline employees. All employees must follow the minimum requirements of this fatigue management program.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all levels of employees.

Supervisors

Enforce the guidelines addressed in this policy.

Procedures

Miller Pipeline will set hour limitations and will control job rotation, schedules to control fatigue, allow for sufficient sleep, and promote ways to increase mental fitness in an effort to control employee turnover and absenteeism.

Ergonomic equipment may be used to help improve the workstation conditions; such as, lift assist, proper lighting and other devices as deemed appropriate.

An analysis of work tasks must be performed periodically to determine fatigue.

Depending on weather conditions, the amount of rest breaks will be determined for that day by the foremen on site.

Employees in Safety critical positions shall report fatigue/tiredness & lack of mental acuity to supervision, as well as supervisory personnel to make safety critical decisions and take appropriate actions to prevent loss.

Employees must not chronically use over-the-counter or prescription drugs to increase mental alertness. Employees should be discouraged from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.

If an injured employee's heart stops beating or they stop breathing, the Foreman or other trained and authorized employee, will perform CPR and use an AED (if one is available). This individual stop all CPR procedures as soon as the designated emergency responders arrive and take over.

Extended Work Hours

Once a crew reaches 10 hours in their work shift they are to contact their supervision team to discuss an estimated time of completion.

- If the estimation is more than 2 hours then the supervision team will start to make consideration for a relief crew.

- When considering the relief crew please remember:
 - Weather conditions of the day (Extreme hot or cold conditions)
 - Work schedule of the relief crew (prior work shift)
 - Extent of work conditions (Heavy work load)
- Communication between crew and supervision will occur at 12 hours to discuss progress made since 10 hour check in.
 - If work does not seem like it will be completed within an hour of the 12 hour check in then a relief crew needs to be contacted for replacement.
- No crew is to work more than 14 hours without reasonable rest time between shifts.
 - If a crew works 14 hours consideration needs to be taken to provide transportation of employees and equipment from site.

*Crews that are contacted directly by the Gas Company for emergency work are required to contact their supervision team before responding to the emergency.

Training Requirements

Initial and annual training must be provided on how to recognize fatigue, how to control fatigue through appropriate work and personal habits, and timely reporting of fatigue to supervisors..

Fire Prevention & Protection

Purpose

Identify and control potential fire hazards, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline.

Definitions

Class IA Liquid: Liquid having flashpoint below 73 degrees and boiling point below 100 degrees.

Class IB Liquid: Liquid having flashpoint below 73 degrees and boiling point above 100 degrees.

Class IC Liquid: Liquid having flashpoint above 73 degrees and boiling point below 100 degrees.

Class II Liquid: Liquid having flashpoint above 100 degrees below 140 degrees.

Class IIIA Liquid: Liquid having flashpoint above 140 degrees and boiling point below 200 degrees.

Class IIIB Liquid: Liquid having flashpoint above 200 degrees.

Flammable Liquid: Any liquid having a flashpoint below 100 degrees F.

Fire Watch: An employee who monitors hot work activities & responds to any type of ignition. This person will be equipped with a charged extinguisher, perform only the duty of watching for & responding to fires, and wait at least 30-minutes after the activity to monitor for smoldering materials.

Incipient Stage Fire: A fire that is in the initial or beginning stage that can be controlled by portable fire extinguishers.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman

Enforces the guidelines addressed in this policy.

Employees

Act as a fire watch when designated by the Foreman to do so.

Procedures

Employee Designation

The Foreman of each job site will be responsible for overseeing the maintenance of all fire suppression equipment, as well as the control of all fuel sources. Regional safety personnel will also review these items for compliance as part of their on-site audits.

Fire Hazards

General Safety Rules

Flammable liquids will not be used within 20 feet of areas where sources of ignition are likely to be present unless taking proper precautions and assigning a person to act as a fire watch (refer to *Definitions* for responsibilities).

Highly visible signs reading "No Smoking or Open Flame" will be posted on aboveground tanks, barrels and in all flammable storage locations. Smoking is not permitted within 50 feet of pits, excavations, or street openings. Never smoke on customer's premises.

Drums will be properly grounded, and containers will be bonded to the drum when transferring flammable liquids into portable containers.

Flammable liquids will be kept in closed containers when not actually in use. All leakage or spillage will be disposed of promptly and safely.

Indoor Flammable Storage

Not more than 25 gallons of Class IA or 120 gallons of Class IB, IC, II or III liquids will be stored outside a flammable storage cabinet. All unused containers must be kept sealed.

Twenty-pound Class ABC fire extinguishers will be mounted within 10 feet of each flammable storage location and maintained ready for immediate use.

Outdoor Flammable Storage

All flammable liquid containers will be maintained in orderly piles when stored outdoors. These piles will remain at least 20 feet from highly traveled passageways, roads, building structures and work areas that involve any type of source of ignition. Containers will be guarded from excessive weather damage as well by installing temporary overhead shelter or covering them prior to leaving each day.

All storage sites will be kept free from accumulation of unnecessary combustible materials. Weeds and grass will be kept down, and debris will be picked-up regularly.

Storage containers (not more than 60 gallons each) will not exceed 1,100 gallons in any one pile or area. Each storage pile will be separated by a 5-foot walkway. A 12-foot-wide access way will be maintained to permit approach of fire control apparatus.

At least one portable fire extinguisher having a rating of not less than 20-B units will be maintained between 25 – 75 feet from each flammable storage pile.

Aboveground storage tanks will be equipped with a containment system that is rated to hold 1.5 the tank's capacity. All tanks rated with a capacity of 1,100 gallons or more will be separated by a 5-foot clear area.

Weeds, debris and other combustible material must be removed from storage areas.

Sources of Ignition

All flammable liquids and materials will be kept away from areas in which sources of ignition are frequently located. Some of these areas on Miller Pipeline job sites may include such tasks as hot work, the use of striking tools, and equipment operations.

Smoking, hot work and other sources of ignition are prohibited within 50' from the use of flammable or combustible liquids and 20' from storage areas unless an approved barrier or adequate ventilation is used. This includes the back of pickup trucks and tool vans when flammables are present.

Fire Protection Equipment

Fire Hydrants

Fire hydrants and hose receptacles will remain free from parked vehicles and other obstructions by at least 15 feet. Small easily movable barricades or road cones will be placed in front of all hydrants to prevent employees from parking in these areas.

Fire Extinguishers

Whenever working inside of a building or structure, type 2A rated fire extinguishers shall be located on each floor of the structure and within 100' from each work area.

Whenever working with flammable or combustible liquids/gasses/vapors, type 10B rated fire extinguishers shall be located within 50'.

Fire Extinguishers are also located in the cab of all Miller Pipeline vehicles. These extinguishers must be secured and easily accessible at all times.

Fire extinguishers will remain fully charged, unobstructed, and in good condition.

Foremen will visually inspect extinguishers on a monthly basis. The extinguisher vendor will conduct certified inspections annually and hydrostatic testing as needed. Damaged or spent extinguishers will be replaced and removed from service and repaired or charged.

Hose and Sprinkler Systems

Hoses will remain unobstructed at all times, and a vertical clearance of at least 18 inches will be maintained for each sprinkler head. Heads may not be covered with any material that might limit their effectiveness (i.e. something that can melt).

Housekeeping of Flammable Waste

Employees will notify the Foreman of any excess flammable materials that may need to be disposed of. The Foreman will consult with the Safety Director if necessary.

Training Requirements

All employees will be educated on the contents of this policy during Safety Orientation. All employees will be trained on the use of fire extinguishers and the hazards involved in incipient stage fire fighting annually.

First Aid/CPR/AED

Purpose

To establish a procedure for providing medical treatment to employees who need immediate care.

Scope

In the absence of an infirmary, clinic, hospital, or physician, that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first aid shall be available at the worksite to render first aid.

Responsibilities

Safety Director

Organizes First Aid/CPR training and maintains documentation.

Ensures Miller Pipeline has AEDs at some facilities and a maintenance/inspection plan is developed and followed.

Foreman

Ensures first-aid kits are kept fully stocked on each job site and checked weekly.

Performs First Aid/CPR on employees who need immediate care.

Contacts the designated emergency responder whenever an incident with severe injury occurs.

Employees

Notifies the Foreman immediately after any incident with injury occurs, and provides First Aid as needed if appropriately trained and qualified.

Procedures

A first aid cabinet shall be easily assessable and will be posted and fully stocked at every facility, on every job site, and in all company vehicles. First aid kits shall consist of appropriate items which will be adequate for the environment in which they are used. Items shall be stored in a weather proof container with individual sealed packages of each type of item. First Aid kits will be checked before being sent out to each job and then Foremen will ensure they are stocked weekly.

A trained and authorized Foreman will administer First Aid/CPR/AED to employees who need immediate care. In the event a Foreman is unavailable, another trained and authorized employee may provide First Aid/CPR/AED as necessary.

Foremen will guide employees who have minor injuries on how to properly treat themselves. If an incident occurs that requires more than basic first-aid to properly treat an injury, the Foreman will designate a nearby individual to contact 911 and will care for the injuries until an ambulance arrives.

If an injured employee's heart stops beating or they stop breathing, the Foreman or other trained and authorized employee, will perform CPR and use an AED (if one is available). This individual stop all CPR procedures as soon as the designated emergency responders arrive and take over.

FIRST AID SUPPLIES AND EQUIPMENT

All company vehicles will have a fully stocked first aid kit kept inside them. First Aid Kits must be checked at least weekly and restocked as needed. Restocking should be done from the First Aid Kit at your office location. It is important that our first aid supplies and equipment meet the specific needs of our workplace. Supervisors are to ensure that adequate first aid supplies are readily available, including:

- Adhesive Bandage
- Adhesive Tape
- Antibiotic Application
- Antiseptic
- Breathing Barrier
- Burn Dressing (gel soaked)
- Burn Treatment
- Cold Pack
- Eye Covering with means of attachment
- Eye/Skin Wash
- First Aid Guide
- Hand Sanitizer
- Medical Exam Gloves
- Roller Bandage (2 inch, 4 inch)
- Scissors
- Splint
- Sterile Pad
- Tourniquet
- Trauma Pad
- Triangular Bandage

Training Requirements

All Foremen will maintain current certification in First Aid/CPR and AED, ~~but~~ all employees are offered the training. All crews require at least two First Aid/CPR/AED trained individuals. A valid certificate in first aid training must be obtained from the American Red Cross, American Heart Association, or equivalent training that can be verified by documentary evidence. This training is valid for 2 years. Copies of certifications will be kept on file.

Fleet Safety

Purpose

The purpose of this policy is to provide a uniform and consistent guideline and procedure in which to address the use of company vehicles, so as to comply with applicable regulations and laws pertaining to the operation of these vehicles. It also serves as a means to ensure all Miller Pipeline employees understand their responsibility in the operation of such vehicles, to reduce and minimize accidents and injuries.

Scope

This policy applies to any person who currently operates, or may operate, company vehicles and equipment. Unless otherwise specified, failure to comply with the elements of this policy, will result in disciplinary action, up to, and including, termination of employment.

Responsibilities

Director of Safety

- Maintain all documentation required by this policy.
- Review and validate investigation reports and findings.
- Conduct post-accident rides with all drivers involved in a vehicular accident.
- Complete the vehicle accident form in Fleet Response.

Employee

- Follow all requirements of this policy. Only authorized employees will drive a motor vehicle in the course and scope of work or operate a company-owned vehicle. Drivers shall be appropriately assessed, licensed, and trained to operate the vehicle.
- Complete a pre and post vehicle inspection daily.

Procedures

New Hire Selection

To be suitable to operate a vehicle for Miller Pipeline, the prospective employee must meet the following criteria, based upon the prospective employee's current Motor Vehicle Report:

1. Possess a minimum of a valid operator's license.
2. Must not have been cited and convicted within the most recent two (2) year period due to a driving violation for:
 - a. Hit and Run
 - b. Driving with a revoked, suspended, or cancelled driver's license if due to a driving violation.

- c. Open container of alcoholic beverage or possession of controlled substance and/or controlled substance paraphernalia.
- 3. Accumulate more than six (6) points based on the following Miller Pipeline criteria within the most recent two (2) year period:
 - a. Moving violation 2 points
 - b. Speeding 2 points
 - c. Seat belt violation 2 points
 - d. Speed contest 4 points
 - e. Reckless Driving 4 points
 - f. DUI – Controlled Substance or Alcohol 4 points *

* If this situation exists within the most recent two (2) years, paragraph 3 of this section will apply to the most recent four (4) year period or as far back as the MVR data provides, up to and including 4 years.

Current Employees

This policy has been developed by Miller Pipeline and applies to all employees. However, it is important to note that the company's insurance provider may adopt more stringent protocols that could supersede this plan. If the company's insurance provider chooses not to insure an employee or suspend their driving privileges, the company will have to comply with their request (even if they are within acceptable limits of this plan).

To be suitable for operation of a company vehicle, all assigned drivers must meet the following criteria, based upon the employee's current Motor Vehicle Report:

1. Possess the required type of driver's license for the equipment operating (ex: CDL).
2. Possess a license and current DOT medical physical for operating all company motor vehicles over 10,000 lbs. GVWR for all company motor vehicles over 26,000 lbs. GVWR, a CDL license is required (The D.O.T. Medical Physical may not always be indicated on an MVR).
3. Possess a minimum of a valid operator's license.
4. Be 18 years of age.
5. Must not have been cited and convicted in the most recent two (2) year period and accumulated more than eight (8) points while driving a vehicle for:
 - a. Speed contest/Reckless Driving 4 points *
 - b. Moving Violation 2 points *
 - c. Hit and run 6 points *
 - d. Driving with a revoked, suspended, or canceled driver's license due to a moving violation 4 points *
 - e. DUI – controlled substance or alcohol in a private vehicle. 4 points *
 - f. Possession of controlled substance(s) and/or controlled substance paraphernalia.*** 6 points *
 - g. Open container of alcoholic beverage 4 points*

* These violations in Section II, B, 5, may result in termination of employment if occurred in a Company Vehicle. See Section II. C.

*** The determination of controlled substance paraphernalia will be based upon the agreement of at least two supervisory personnel, who have both completed the D.O.T. Drug and Alcohol Supervisory Training, and/or, the opinion(s) of law enforcement personnel upon their solicitation for assistance in this matter, and/or, picture(s) of the questioned controlled substance paraphernalia for review by the second (or more) trained supervisor who may be unable to be on site where the controlled substance paraphernalia is located. If picture(s) are utilized, the picture(s) must have identifiable indicators of the time, date, and location within the Miller Pipeline jobsite and/or property.

All employees having accumulated eight (8) points will have their motor vehicle report (MVR) and company driving record reviewed by the Directory of Compliance and the requesting supervisor. Those exceeding 8 points will not be permitted to operate company vehicles until their points are reduced to, and reach 8 or lower.

State Law requires operators of motor vehicles to be properly licensed for the class of vehicle they will be driving and as such, if an employee's job requires them to hold a valid motor vehicle license and it has either expired, has been suspended, revoked, or cancelled, then the employee will be placed on immediate suspension from operating any Miller Pipeline vehicle and from work, if no position is available that doesn't require a license. Within a maximum of 30 calendar days, the employee must provide written documentation from the state the license was issued, that the employee's license has been renewed, or the suspension, cancellation, or revocation has been lifted.

If the employee has not provided this documentation to the Compliance Department within the 30 calendar day period, the employee will be considered terminated.

A copy of the individual's M.V.R., as well as a letter outlining the expiration/suspension matter will be provided to the employee upon the information being provided to the company. This information will also be provided the employee's area supervisor.

Current Employees – Driving Violations in Company Vehicles:

Definitions

Chargeable DOT Inspection Violation: A violation(s) issued by law enforcement in which the violation(s) noted are deemed by Miller Pipeline Fleet Dept. as being in the control/responsibility of the Miller Pipeline driver.

Preventable Vehicle Accident: When an employee is found by the company to be responsible for causing bodily injury, significant property damage, or any vehicular damage that requires repair due to unsafe driving of a company vehicle.

Valid Driving Complaint: A complaint of a significant nature (e.g. following too close, excessive speeding, weaving in and out of traffic, crude/obnoxious physical or verbal gestures, reckless driving, aggressive driving, etc.) regarding a Miller Pipeline employee driving a company vehicle in an unsafe manner that is deemed by the company as being valid

Procedure

GATHERING EMPLOYEE HISTORY

An employee's loss history with the company as well as their Motor Vehicle Report (MVR) will be gathered whenever an employee has a preventable vehicle accident, receives a valid driving complaint, obtains a chargeable DOT inspection violation, or when the company is notified of a motor vehicle violation. The data gathered will include information on all incidents that occurred in a company vehicle within the previous three (3) years.

ASSIGNING POINT VALUES

Points will be assigned for each incident as indicated in the table below. Please note that only violations that have resulted in conviction will be assigned points.

<i>INCIDENT</i>	<i>POINT</i>
A. Possession of Controlled Substance or Paraphernalia***	12 points
B. Open Container or Alcoholic Beverage	12 points
C. DUI - Controlled Substance or Alcohol	12 points
D. Vehicular Homicide or Assault	12 points
E. Reckless Driving or Speed Contest	12 points
F. Hit and Run	12 points
G. Failure to Report a Company Vehicle Accident	12 points
H. Driving a commercial motor vehicle (>10,000 lbs. GVWR) Without a DOT Medical Card **	12 points
I. Driving a MPC vehicle without the proper/valid license **	12 points
J. Preventable Vehicle Accident	5 points
K. Valid Driving Complaint	3 points
L. Moving Violation	3 points
M. Chargeable DOT Inspection Violation	3 points

** These incident types will be evaluated separately, even though could be in combination aspart of a DOT inspection.

*** The determination of controlled substance paraphernalia will be based upon the agreement of at least two supervisory personnel, who have both completed the D.O.T. Drug and Alcohol Supervisory Training, and/or, the opinion(s) of law enforcement personnel upon their solicitation for assistance in this matter, and/or, picture(s) of the questioned controlled substance paraphernalia for review by the second (or more) trained supervisor who may be unable to be on site where the controlled substance paraphernalia is located. If picture(s) are utilized, the picture(s) must have identifiable indicators of the time, date, and location within the Miller Pipeline jobsite and/or property.

ISSUING CORRECTIVE ACTION

All points assigned to each incident involved in the review will be totaled and corrective action will be implemented according to the table below. All corrective actions will be documented and maintained on file.

<i>POINT TOTAL</i>	<i>CORRECTIVE ACTIONS</i>
3-5 points	Written Warning (DISCRETIONARY: Accident Review Meeting, Re-Training)
6-8 points	1-3 Day Unpaid Suspension (DISCRETIONARY: Accident Review Meeting, Re-Training)
9-11 points	3-5 Day Unpaid Suspension (DISCRETIONARY: Accident Review Meeting, Re-Training)
+12 points	Termination or Driving Suspension (until point total drops below 12)

Rear-End Collisions

Employees who are involved in a preventable rear-end collision will be issued a one-week unpaid suspension at a minimum. This policy applies to all Miller Pipeline employees, including management members.

An assigned driver/employee will not be allowed to operate a company vehicle for twenty (20) workdays for the following violation:

- Permitting non-employees to operate a company vehicle without permission from the employee's department manager.

First Move Forward

Regardless of the parking environment (i.e. parking lots, streets, jobsites, etc.), all employees are required to park or position company vehicles so the first move will be forward when the vehicle exits the parking area. This can be accomplished by pull through parking, curbside parking, or backing into parking spaces. If following this requirement would create more of a hazard (i.e. towing equipment, backing into angled parking spaces, etc.), then a spotter must be used while backing. If a spotter is not available, then the vehicle operator must physically walk all the way around the vehicle immediately prior to backing.

Accident Reporting

All accidents involving a company owned vehicle must be reported to the Safety Department within 24 hours after the occurrence. A completed company accident form must be in the possession of the Safety Department within 24 hours after the occurrence.

Vehicle Accident Response

1. Secure the accident site.
2. Request medical assistance if injuries have occurred.
3. Notify the appropriate law enforcement agency.
4. Notify your immediate company supervisor.
5. Get pertinent information to complete company vehicle accident form (i.e., insurance information, names and addresses and vehicle license tag numbers).

Supervisor Accident Investigation

1. The immediate supervisor of an individual involved in a vehicle accident will complete the company accident form and submit it to the Safety Department within 24 hours after of occurrence when logistically possible.
2. The Director of Safety retains the final decision for determining accident preventability. Upon the completion of the investigation of the incident, the findings of accident preventability could result in termination, but at a minimum will include:
 1. The safety department will review the employee's history and decide on a written reprimand with a warning of future discipline for other occurrences.
 2. The employee will be required to attend a defensive driving course within 30 days of the preventable determination.
 3. Work suspension.
 4. Possible termination of employment.
3. The Director of Safety and the employee's Department Manager retains the final decision for disciplinary assessment.

Traffic and Parking Violations

Any ticket received for a moving violation is that driver's responsibility for payment. The cited employee's department manager must approve company payment of parking violations.

Operator's License

Every employee operating a company vehicle must have a valid operator's license, or CDL if required, in their possession as well as a current D.O.T. medical physical for operating company vehicles over 10,000 lbs. Gross Vehicle Weight Rating (GVWR).

Commercial Motor Vehicle Operations (over 10,000 lbs. GVWR)

1. All CDL assigned drivers will have in their possession a valid commercial driver's license (CDL).
2. All assigned drivers must be 18 years of age.
3. Receive a satisfactory driver's medical examination every 24 months and carry the D.O.T. medical card while operating any company motor vehicle over 10,000 lbs. GVWR.
4. A drivers qualification file will be maintained on each driver by the Compliance Department. At a minimum, the file will contain copies of:
 - a. Driver's application for employment
 - b. Driver's license copy
 - c. Medical examiner's certificate
 - d. Driver's record of traffic violation
 - e. Accident reports in which the driver has been involved
 - f. Any matter that relates to the driver's ability to operate a motor vehicle safely
 - g. Request for check of driving record
 - h. Request for information from previous employer
 - i. Record of road test
 - j. Certificate of compliance with driver license requirements
5. Drivers may only drive up to 11 hours, and only after 10 consecutive hours off-duty, and may not drive beyond the 14th hour after coming on-duty, following 10 consecutive hours off duty. Drivers may not drive after being on duty for 60 hours in a 7 day period or, 70 hours in an eight day period. This 60/7 and 70/8 period may be re-started after at least 34 consecutive hours off-duty.
6. Part 383 (CDL operations), 391, and 392 of the Federal Motor Carrier Safety Regulations (FMCSR) contain some requirements that drivers must comply with. With regards to **NOTIFICATION OF LICENSE SUSPENSION, REVOCATION OR CANCELLATION**: Section 392.42 and 383.33 of the FMCSR's require that you notify the company the NEXT BUSINESS DAY of any revocations or suspension of your driver's license. In addition, section 383.31 (CDL operations) requires that any time you violate a state or local traffic law (other than parking), you must report it within 30 days to: 1) the company, and 2) the state that issued the driver's license (If the violation occurs in a state other than the one which issued the driver's license). The notification to both the company and the state must be sent in writing.

Insurance

Any employee denied coverage by the company's insurance carrier will not be allowed to operate a company vehicle.

Vehicle Maintenance

1. Assigned drivers are responsible for inspecting the vehicle for road worthiness (Pre-trip inspections – i.e., lights, tires and possible debris that may spill onto the roadway).
2. No company vehicle will be operated if any defect constitutes a hazard.
3. Any defects or malfunctions must be reported immediately to your immediate supervisor.
4. No vehicles will be modified in any form except by the Vehicle Maintenance Department.
5. When abuse of company equipment is considered to be blatant, the employee who abuses the equipment will be personally responsible.

6. The cleanliness of company assigned vehicles will be the responsibility of the crew foreman who assigned the equipment.
7. All assigned vehicles will be serviced and maintained according to manufacturer's recommendations or company maintenance schedules.

Firearms

For the safety and security of all employees, customers, vendors and the general public, Miller Pipeline prohibits the possession of firearms and weapons on company property and/or in the course of conducting company business. This includes any Miller Pipeline property, building, vehicle or equipment that is owned or leased.

Possession of a firearm or weapon in an employee's own personal vehicle while parked on company property may be authorized provided that the employee has a legal permit to carry the firearm or weapon (if required by law), the firearm or weapon is not loaded, and written authorization is obtained from a company Vice President. To obtain written authorization, contact Human Resources.

Providing a safe and secure work environment is of utmost importance. Failure to comply with this policy will result in disciplinary action up to and including termination of employment.

Addendum Rules

1. Neither non-immediate relatives, nor non-employee may ride in a company vehicle unless it is for company business, or if authorized by the employee's department manager.
2. Personal use of Company vehicles is authorized only for commuting to and from work, or for a personal errand on the way between an employee's home and work, or lunch between business stops. This use must not affect work schedules and should only incur minor changes in the time the vehicle is used and the distance traveled.
3. Any cosmetic changes to company vehicles made by an employee must have the written consent of the Department Vice-President of that operating area.
4. No additional riders will occupy a company owned piece of equipment unless it is specifically designed to seat additional occupants.
5. Use of provided seat belts are required when operating any company vehicle.
6. Always remove keys and lock any vehicle not in use.
7. The company is not financially responsible for the theft or damage of personal items on or off company property.
8. Do not leave your vehicle without securing it from movement, including setting the parking brakes and/or wheel chocks.
9. If a non-company owned vehicle is struck by our vehicle and its owner is not available, leave your name and our number on the damaged property.
10. It is the driver's responsibility for preventing property damage due to unsecured loads from spillage or shifting.
11. The crew foreman is responsible for securing all company vehicles from theft or damage when left off the company premises.
12. When driving Miller Pipeline Vehicles, employees must ALWAYS remember to:
 - a. Obey local traffic laws.
 - b. Leave lots of room between vehicles in front.
 - c. Know what other traffic around me is doing by paying attention.
 - d. Never back up without a guide person.
 - e. Represent Miller Pipeline Professionally.
 - f. Keep vehicle in safe condition and conduct a pre-trip inspection.
13. Company Issued Cellular phones: In an effort to minimize distraction while driving, the following rules/requirements must be followed when using cellular phones in company vehicles:
 - a. Minimize use while driving.
 - b. Do not initiate a call in heavy traffic and danger zones.

- c. If you receive a call in heavy traffic and danger zones, safely pull off the road or call back later.
 - d. Do not take your eyes off the road to dial.
 - e. Company issued phones are for company business, not personal use.
 - f. Get to know your phone and its features, so you can use the speed dial and other functions without taking your attention off the road.
 - g. The use of a hands-free device can reduce distractions while driving.
 - h. Make sure you place your wireless phone within easy reach and where you can grab it without removing your eyes from the road.
 - i. Do not take notes or look up phone numbers while driving. Dial sensibly and assess the traffic; if possible, place calls when you are not moving or before pulling into traffic.
14. Personal Cellular Phones:
- a. Personal cell phone use is strictly prohibited while operating a company vehicle.
 - b. The job foreman must approve personal cell phone use on the job site.
15. Any departures, amendments, changes, exclusions, alterations, or waivers from this Motor Vehicle Policy will only be authorized by the written consent of the President of Miller Pipeline.

Exclusionary Clause

1. Points additional to those outlined on this policy may be assigned by the Director of Compliance, and/or the Director of Safety, and the employee's Divisional Manager to any offending employee regarding the violation of any item referred to in this policy. Assigned points will remain intact for two (2) year period unless removed by the Director of Compliance or the Director of Safety for the following:
 - a. The employee has demonstrated through related work performance attitudinal adjustment observed and improved achievement.
 - b. The employee has successfully completed a Safe Driving related course.
2. Any subsequent discipline regarding an employee's driving performance will be reviewed and determined by the Director of Compliance and/or the Director of Safety, and the employee's Divisional Manager.

Training Requirements

This section will be covered during Safety Orientation.

Forklift Operations

Purpose

Identify the proper procedures for controlling hazards associated with operating forklifts, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline who operate forklifts.

Definitions

Fixed Objects: Any stationary object that is capable of restricting an employee's ability from moving out of the path of a forklift.

Unattended: When the operator is twenty-five feet away from a forklift, cannot visually see the forklift, or is around a corner from a forklift.

Wheel chocks: Devices wedged between tires and ground to prohibit equipment from moving.

Lifting Carriage: A bucket or other lifting device attached on the end of a forklift.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Conducts all Certification Training for operators.

Maintains all maintenance documentation and completed *Lift Truck Daily Check Sheet*.

Foreman

Enforces the guidelines addressed in this policy by constantly monitoring the safe operations of operators and the proper control and isolation of all hazards on job sites.

Ensures that all forklifts that are found defective are immediately removed from service, tagged out and receive necessary maintenance as soon as possible.

Conducts an informal job site inspection prior to beginning work on a new project.

Employees

Conduct daily inspections by completing the *Lift Truck Daily Check Sheet* (located in the Forms Section)

Procedures

Certification

Employees will not operate forklifts for any amount of time unless they have been trained according to the Training and Education section of this Health & Safety Program and have received certification. Certificates will include the operator's name, trainer's name, date of training and the date of evaluation and will be kept in each employee's file.

Inspection

Foremen will conduct an informal job site inspection to identify all hazards that may be encountered by forklift operators prior to beginning work on a new project. Identified hazards will be verbally communicated to all operators, and periodically monitored for unexpected changes. Some examples of these hazards include overhead power lines, valleys and ditches, flammables, bodies of water and large branches or rocks.

Operators will complete the *Lift Truck Daily Check Sheet* (located in the Forms section) prior to beginning work each day (one per shift).

Safe Work Practices

No person will be permitted to stand or pass under elevated loads.

Personnel will not be elevated using forklifts, unless the forklift is designed by the manufacturer to do so. Proper means of fall protection will be used when an employee is elevated.

Whenever operators drive a forklift into a building or shop/garage bay on a sunny day, they will pause 5-10 seconds to let their vision adjust.

Operators will maintain their focus on pedestrians/site personnel and all operating hazards identified during the initial site inspection, such as overhead power lines and flammable storage piles or areas.

Operators will not be allowed to smoke whenever flammable liquids are located on-site.

When maneuvering forklifts (forward or backward) in a "hazardous location" such as a congested or high traffic area, the Operator must first walk the path of travel in order to identify all potential hazards. They must then assign a spotter *per identified hazard* and instruct those spotters on what to watch for. The Operator must also maneuver the forklift in a slow controlled manner, maintain adequate communication with all spotters, fully obey their commands, and stop immediately if communication ceases.

Spotters must discuss hand signals with Operators before spotting. While spotting they must maintain a safe distance of 10' from the forklift, avoid pinch points, and walk sideways so they can scan the operating area as well as look where they are stepping. Spotters may not use cell phones, hold conversations with anyone other than their assigned Operator, or perform other tasks that may distract them from spotting.

Situations that require the use of spotters on jobsites shall be documented on the *Job Hazard Analysis* form (located in the Forms Section). The situation, hazards involved, and number of spotters shall be included on the form. Anyone who does not feel comfortable with operating equipment or spotting in a hazardous situation should stop and notify their Supervisor before proceeding.

Load Manipulation and Maneuvering

Operators will follow the recommended load capacity and load center ratings according to the information indicated on the manufacturer's identification plate. They will also use the load chart mounted in the cab when determining the machines capability to boom out when lifting loads.

If the load carried obstructs the view of the driver, the driver will be required to travel with the load trailing. Operators will also avoid performing work in restricted spaces. If either of these procedures is not possible, a flag person will be used. The flag person will always be in sight of the driver and use hand signals to direct the driver.

Whenever ascending or descending steep grades, loaded forklifts will be driven with the load upgrade. The load will always be carried as low as possible, while still allowing the operator to utilize the mirror.

Doorways and overhangs will be tall enough to permit proper clearance when traveling. Overhead obstructions that are not of proper clearance or could be questionable will be marked with caution and the rated clearance.

If operators are required to cross railroad tracks while performing work, then they will do so diagonally.

Equipment Usage

Operators will wear seatbelts whenever a truck is equipped with them.

Horns will be sounded at every intersection, when turning corners and when cresting hills.

When an employee finds any kind of defect with a forklift (e.g. deflated tire, damaged mast, leaking oil, etc.), the forklift will be removed from service immediately and a tag will be placed on the steering wheel reading, "Warning: Do Not Operate!". The designated service company will be contacted as soon as possible to conduct on-site maintenance procedures.

All forklift operators will be required to wear work boots, high visibility vest/clothing, and safety glasses (unless glasses inhibit operator's peripheral vision). This should be determined on a case-by-case basis. Employees who operate rough terrain forklifts on job sites will wear all required PPE.

Attachments

Only attachments that are approved by the manufacturer will be used. This approval will be documented and kept on file.

Attachments or forks will not be welded or altered in any way that will decrease their strength.

Unattended Forklift Procedures

When a forklift is left unattended, the forks will be fully lowered, controls placed in neutral, the power off, and parking brake set.

Forklifts that are parked on hills or inclines/declines will have both wheels chocked.

Trailers and/or trucks must be chocked and secured prior to loading/unloading.

Training Requirements

All operators will be issued certification training and a hands-on evaluation before they are allowed to operate a forklift. Formal instruction includes lecture, discussion, interactive computer learning, videos, and written materials. Practical training involves instructor demonstrations and trainee exercises. Operator evaluation - critiques required. Training includes topics such as forklift operating instructions, use of controls, capacity and load stability. Re-evaluation will be conducted every 3-years. All trainers must have the knowledge and ability to teach and evaluate operators.

Mandatory refresher training shall be provided when unsafe operations are observed, after an accident, if operating a different vehicle type, changes in conditions, etc.

Hand and Power Tools

Purpose

Miller Pipeline utilizes various types of tools and equipment in the workplace for many different purposes. Examples include, but are not limited to, portable hand tools, power tools, pneumatic tools, and occasionally powder-actuated tools.

The purpose of this policy is to provide employees with appropriate knowledge relating to the care and use of tools and equipment and to protect employees from hazards associated with improper use of tools and equipment and defective/poorly maintained tools and equipment.

Scope

This section applies to all employees of Miller Pipeline.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman

Enforces the guidelines addressed in this policy.

Ensures that all employees expected to use various tools while performing their regular job functions are familiar with the tool and the safety precautions to take while using it by witnessing them demonstrate their competency.

Procedures

Only trained and/or experienced employees may use/operate tools or equipment. Tools and equipment shall not be modified, and they are to be used only for their designed purpose. It shall be the responsibility of the employee to inspect tools and equipment prior to use and to use all tools and equipment in a safe manner. Employees observed abusing, altering, modifying, or misusing tools or equipment shall be subject to disciplinary action. Employees shall wear all appropriate personal protective equipment while using tools and equipment.

Proper Use and Safe Practices

Use the right tool for the task instead of trying to make the wrong one fit.

Keep control of yourself, the tool, and the job. When applying force with a tool, remember that it may slip, break, or just suddenly do its job. Watch your hands and your balance (body mechanics) to avoid injury.

Vibration Absorbing Gloves are made available to workers using pneumatic impact guns or other vibrating equipment. These gloves are required PPE for worker's operating heavy vibrating tools (i.e. jack hammers, impact guns etc.). The use of these gloves are designed to dampen vibration, dissipate impact and absorb shock, they can assist in the prevention of cumulative trauma injury often associated with operating this type of equipment. They only work if you use them.

Select the right protective equipment for the task and use it properly. Do not use tools and equipment that you have not been trained to use.

Whether furnished by Miller Pipeline or the employee, the tools shall be maintained in a safe condition. Keep tools stored where they will not get damaged and will not present a hazard. Damaged tools shall be red-tagged and turned into the tool room for repair or replacement.

Impact tools, such as hammers, chisels, drift pins, pin bars and knocker wrenches with visible signs of mushrooming, cracking or bending will be removed and red-tagged immediately.

Wooden handle tools, such as hammers, picks, shovels, and brooms with visible signs of cracking, loosening or splintering of the handle will be removed and red tagged immediately.

Wrenches, including adjustable, pipe and socket shall not be used when jaws are sprung to the point of slippage, visible signs of bending, cracking, defective handles or other defects that impair their strength shall also be removed and tagged.

Pipe wrench parts (i.e., jaws) are not to be removed and used for anything other than the manufactured use.

The use of snipes and cheater bars or double wrenching to gain leverage **is prohibited**. Always use tool holder while using hammer and knocker wrenches.

Only tools manufactured and approved for a job will be allowed. Screwdrivers are not to be used as chisels, wrenches or hammers.

Scrap nails and other materials will be picked-up before taking lunch and ending the day each day in any area that hand or power tools are used.

Electrical Power Tools

Ground Fault Circuit Interrupters will be used on every outlet whenever a tool or an electrical extension cord is used. The GFCI are to be plugged-in at the outlets, not at the end of an extension cord!

All power tools are to be equipped with a grounding pin, or of the double insulated type. Tools of a double insulated type will be labeled so. Labels that are not legible or have been removed will be replaced. If the tool is not equipped with one of these or the ground pin has been removed, then the tool will be immediately red-tagged as defective and removed from service until proper repair can be made.

Absolutely no employee is to remove a guard, handle or any other device.

Cords of power tools will remain free from defects such as cracks, frays, cuts or nicks. Any cord that has a defect in the outer insulation only will be removed from service and repaired with heat shrink tubing, or electrical tape at least as thick as the original insulation and 2 inches on both sides of the defect. Any cord that has a defect past the outer insulation will be disposed of immediately.

Whenever work is to be conducted in wet locations, only cordless power tools will be used, or the operator will unplug the tool at the source of power whenever it is not in use. After each day, all tools need to be locked in the job site toolbox to prevent theft or damage.

Power or striking tools will never be used in areas where flammable liquids/materials are within 20 feet. If this is the case, then one of the following actions will be taken to prevent fire or explosion:

- Flammables removed 20 feet from the area
- Work removed and placed in area free from flammables
- A designated employee will serve as a fire-watch

All keys and equipment used to adjust parts will be removed from tools that involve rotating parts prior to beginning operation. Employees will tie back long hair; remove jewelry, and roll-up long sleeves to prevent entanglement when working with tools that rotate.

Do not connect electrical power unless the operating switch is turned off.

Most hand-held electrical tools will be equipped with a "dead-man" or "quick-release" control, so that power is shut off automatically whenever the operator releases the control.

Portable circular saws will be equipped with guards above and below the base plate or shoe. The lower guard will retract when the blade is in use, and automatically return to the guarding position when the tool is withdrawn from the work.

Trigger/switch locks on power tools are prohibited.

All electrical tools and power cords must be inspected per the Electrical Equipment Safety and Inspection Policy.

Electrical tools and power cords must display the current inspection color code for the current inspection period to it being placed in service.

Electrical tools **shall not** be hoisted or carried by their power cords.

Cords are tripping hazards. Route them so as to minimize interference in walkways. Overhead is preferred.

All employees who operate hand or power tools that involve the risk of personal injury such as loss of eye sight/hearing, hand abrasions, or crushes will wear all prescribed PPE during operation. This PPE will be determined by the Safety Director performing a hazard assessment as indicated in the Personal Protective Equipment policy in this safety program.

Air Power Tools

All hoses, exceeding ½" inside diameter shall have a safety device at the source of supply or branch line to reduce pressure in case of hose failure.

Chicago fittings shall be pinned.

Attachments on air tools shall be secured by retainer pins and rings.

Do not connect air unless the operating switch is turned off.

Do not disconnect tool until air supply is shut off and air pressure is bled off. Air power tools **shall not** be hoisted or carried by their hoses.

Hoses are tripping hazards. Route them so as to minimize interference in walkways. Overhead is preferred.

Air power tools shall be tagged and removed from service if any of the following defects are present:

- Air power tools, such as air power grinders, impact wrenches, German hacksaws with visible signs of deformities in the body of the tool, improperly functioning actuator, bent or deformed blades, or any signs of obvious damage to the air supply line fittings.
- Hoses must be visually inspected for cracking, signs of aging, worn or damaged connecting fittings, or any other obvious deformities, such as blistering or bulges.

Powder Actuated Tools

Only employees who have received an approved training course and license for the particular tool to be used may operate powder-actuated tools.

Powder-actuated tools are only to be provided to employees who are trained/licensed to use them.

Powder-actuated tools shall be tested prior to use to ensure all safeties are functioning.

The fastener **shall not** be loaded until ready for the shot. The tool **shall not** be left unattended unless it is unloaded.

Never point either an empty or loaded tool at any person. Keep both hands and feet clear of the open-end of the barrel.

In the event of a misfire, the operator shall hold the tool firmly against the work surface for a period of 30 seconds and then follow manufacturer's instructions.

Personnel, other than the operator of the tool, must stay clear of the area where the tool is being used.

Operators of powder-actuated tools shall wear goggles for eye protection, and wear earplugs while operating these tools. Other workers within 20 feet of the operating area must wear both as well.

A sign at least 8 x 10 inches, using boldface type no less than 1 inch in height, shall be posted within 50 feet of the area where the tool is being used. The sign shall bear the following wording:

CAUTION POWDER-ACTUATED TOOL IN USE

All tools will be used with the correct shield, guard or attachment recommended by the manufacturer.

If the tool misfires, the tool will be kept in operating position for one full minute, and then place in vertical position (muzzle down) while the charge is carefully removed.

Only fasteners specifically designed for the powder-actuated tools are to be used. Boosters will be kept only in the box that they came in. Dropped boosters will be picked-up immediately.

Powder actuated tools will only be used on steel, concrete or block. Never should these tools be used on wood or any other thin material in which the nail could escape through the other side. Employees will inspect the other side of materials to be shot into, such as walls, prior to performing such a task.

To prevent the possible exposure to flying particles, the operator should avoid driving studs through pre-drilled or pre-punched holes without using special guards designed for this type of operation. The operator should also try to avoid driving studs closer than three inches to the edge of the material whenever possible, due of their tendency to split or crack.

Explosive or Flammable Atmospheres

Operators will not be permitted to operate powder-actuated tools in an atmosphere that contains flammable or combustible materials. If these materials are in an area in which work is to be performed, then one of the following actions will be taken to prevent fire/explosion:

- Move all flammable and combustible materials 20 feet from the work area
- Move the materials to be worked on 20 feet from all flammable and combustible materials
- Assign an employee to act as a fire watch (refer to *Definitions* for responsibilities)

Powder-actuated tools shall be tagged and removed from service if any of the following defects are present:

- Tool has visible signs of worn or damaged parts.
- Missing or malfunctioning parts or accessories.
- Missing operator's instruction manual or missing power load and fastener chart.
- Tool misfires more than one time during use.

Inspection and Maintenance Procedures

Powder Actuated tools will be inspected on a daily basis. This inspection will include if the tool is currently loaded, if it has any missing or altered parts or if any other visual defects are noticed. Tools will also be briefly inspected by the operator before loading the tool each time.

Employees will remove the tool from service and inform the Superintendent if a defect is noted. The Superintendent is then to contact the manufacturer to perform any repairs.

These tools will be thoroughly cleaned periodically. All parts will be disassembled when doing so. These parts will be replaced exactly where they came from.

Abrasive Wheel Machinery

Abrasive wheels shall be used only on machines provided with safety guards as defined:

- The safety guard shall be mounted so as to maintain proper alignment with the wheel, and the strength of the fastenings shall exceed the strength of the guard.
- Grinding machines shall be equipped with flanges.
- Abrasive wheel machinery guards shall meet the design specifications of the American National Standard Safety Code for the Use, Care, and Protection of Abrasive Wheels, ANSI B7.1-1970, which is incorporated by reference as specified in Sec. 1910.6.

Tool Inspection Procedures

Each employee will visually inspect all hand or power tools prior to use each day. If they find a defect, then they will place a red-tag on the tool indicating its defect, take it out of service and immediately inform the Superintendent. These tools will not be used until the proper repairs have been made. Once the tool is repaired, the tag will be removed and placed back in service.

Electrical power tools shall be tagged and removed from service if any of the following defects are present:

- Electrical power tool cord does not have current inspection color code.
- Power cord is frayed, cut or damaged. The use of electrical tape to cover damage to cords **is prohibited**.
- Defective or faulty on/off switches.
- Loose or defective components

The power source on tools shall be physically disconnected prior to attempting any repairs or attachment replacement.

It shall be the responsibility of the General Foreman or Site Superintendent to designate a competent person who will be assigned to oversee the inspection and coordinate any testing/inspecting and repairing of tooling and equipment and ensuring it's in safe operating condition. All periodic inspections, maintenance and repairs of tools or equipment shall be documented, and this is also on our internal audit checklist used by Management and Safety/Quality personnel.

All tools shall be identified and inventoried either individually or by group.

All tools in the inventory shall have a documented inspection at least once every six months. In addition to these periodic documented inspections, all tools shall be inspected prior to issue and prior to each use by the individual user.

All tools will be maintained in good working condition with no modifications.

All periodic inspections and all maintenance & repairs shall be documented. Completed forms shall be kept for one year and available upon request.

Training Requirements

This section will be covered during Safety Orientation.

Hazard Communication

CFR 1926.59; 1910.1200

Purpose

Identify and control potential hazards associated with handling hazardous chemicals and comply with the Federal OSHA standards 1926.59 and 1910.1200.

Scope

This program applies to all employees of Miller Pipeline and will be made available to all company employees 24-hours a day by contacting Verisk 3E at 1-800-360-3220, as well as a hardcopy that is kept in the warehouse.

Definitions

Chemical: Any substance or mixture of substances.

Chemical Name: The scientific designation of a chemical in accordance with the nomenclature system developed by the international Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name that will clearly identify the chemical for the purpose of conducting a hazard classification.

Classification: To identify the relevant data regarding the hazards of a chemical; review those data to ascertain the hazards associated with the chemical; and decide whether the chemical will be classified as hazardous according to the definition of hazardous chemical in this section. In addition, classification for health and physical hazards included the determination of the degree of hazard, where appropriate, by comparing the data with the criteria for health and physical hazards.

Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical.

Hazard Category: The division or criteria within each hazard class (e.g. oral acute toxicity and flammable liquids include four hazard categories). These categories compare hazard severity within a hazard class and should not be taken as a comparison of hazard categories more generally.

Hazard Class: The nature of the physical or health hazards (e.g. flammable, solid, carcinogen, oral acute toxicity, etc).

Hazardous Chemical: Any chemical which is classified as a physical hazard or health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Hazard Statement: A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including the degree of hazard (where appropriate).

Health Hazard: A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

Flammable Gas: Any gas at 68°F and a standard pressure of 14.7 psi that is flammable whenever it's mixed with air (e.g. Ammonia).

Flammable Liquid: Any liquid having a flash point of 199.4°F or less (e.g. diesel fuel).

Label: An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.

Label Elements: The specified pictogram, signal word, hazard statement, and precautionary statement for each hazard class and category.

Mixture: A combination or a solution composed of two or more substances in which they do *not* react.

Non-Routine Tasks: Tasks that include handling hazardous chemicals which does not occur during normal operation.

Pictogram: A composition that may include a symbol plus other graphic elements (e.g. a border, background pattern, or color) that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to the hazard category.

Precautionary Statement: A phrase that describes recommended measures for minimizing or preventing adverse effects resulting from exposure to a hazardous chemical.

Product Identifier: The name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label, and the SDS.

Physical Hazard: A chemical that is classified as posing one of the following hazardous effects: explosive, flammable (gases, aerosols, liquids, or solids), oxidizer (liquid, solid or gas, self-reactive, pyrophoric (liquid, or solid), self-heating, organic peroxide, corrosive to metal, gas under pressure, or in contact with water emits flammable gas.

Pyrophoric Gas: A chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.

Safety Data Sheet (SDS): Written or printed material concerning a hazardous chemical that is prepared in accordance with this section.

Signal Word: A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in this section are “danger” and “warning.” “Danger” is used for the more severe hazards, while “warning” is used for the less severe.

Simple Asphyxiant: A substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.

Substance: Chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurities deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

Work Area: A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

Workplace: Any area that an employee performs work while located on Miller Pipeline property.

Responsibilities

Safety Director

Create a Hazardous Chemical List that inventories all hazardous chemicals used within the company, update it as changes occur, and keep it at the front of the corporate SDS binder.

Assemble a binder that contains all company SDS, keep it updated as new SDS are received, and send new SDS to each Superintendent so they can update their hardcopies.

Keep an updated copy of the Hazardous Chemical List & SDS Binder in the warehouse.

Train all employees on the content of this policy during Safety Orientation.

Determine the proper procedures to take when dealing with a non-routine task.

Superintendents

Make sure that employees have access to the Verisk 3E phone number, or that the Hazardous Chemical List & SDS Binder are present on each workplace/jobsite (if required by Owner) before starting, and update them upon receiving a new SDS from the Safety Director.

Watch for new chemicals brought onto the jobsite, place new SDS in the SDS binder (if one is required onsite), update the Hazardous Chemical List, and send a copy of the SDS to the Safety Director.

Educate employees on the hazards & precautions of any new chemicals as they are introduced.

Enforce the practice of properly labeling all secondary hazardous chemical containers & wearing prescribed PPE when handling hazardous chemicals.

Oversee the response to exposure incidents and/or chemical/waste spills, and report them upon making the situation safe.

Employees

Learn about and become familiar with the hazards associated with the chemicals handled while working for Miller Pipeline.

Properly label all hazardous chemicals as required by this program.

Take all required precautions when handling hazardous chemicals, including the use of PPE.

Report any exposure incident or chemical/waste spill to the Supervisor immediately.

Procedures

Designation of Responsibility

Due to the diverse knowledge levels, work locations, time schedules, and core responsibilities of Miller Pipeline management members, it is not practical to designate one individual to control the entire Hazard Communication Program. The tasks associated with this program will be divided as indicated in the *Responsibilities Section* above to allow the company to be more successful in controlling the program.

Hazardous Chemical Identification










Warning Labels

Any chemical that is deemed to be a “Hazardous Chemical” by the manufacturer or otherwise will be properly labeled. Miller Pipeline will rely on chemical manufacturer and supplier to properly label their products. Each of these labels must include the following:

- The Product Name
- The Manufacturer’s Information (*Company Name, Address, Phone Number*)
- Pictograms (*all that apply*)
- A Signal Word
- Hazard Statements (*for each hazard class and category*)
- Precautionary Statements

Pictograms must be OSHA approved images and have a red border (see the table below). Signal words will either be “Danger” or “Warning”, with danger being used for more hazardous chemicals.

OSHA Approved Pictograms

<p>Health Hazard</p>  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (<i>fatal or toxic</i>) 	<p>Environment (<i>Not Mandatory</i>)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity

Warning Labels (*continued...*)

All secondary containers for hazardous chemicals must also contain the same information listed above. Since labels must contain all of the information above and include a red border, using a black marker to label the name of a chemical is not allowed. These labels shall be made and printed ahead of time for application.

Labels must remain legible and located in a conspicuous location. Any label that is removed or defaced must be replaced immediately.

To avoid potential chemical over exposure, employees will be instructed to never assume an unlabeled container is harmless, mix chemicals that are not properly labeled, or remove a label unless they immediately replace it with another one. If a container is mislabeled, it shall be removed from general use and properly labeled.

Safety Data Sheets (SDS)

General Information

An SDS will be maintained for each hazardous chemical used, handled or stored by Miller Pipeline employees. All SDS are required to contain sections 1-11 and 16 displayed below, and may also include sections 12-15 (although these sections are not required):

1. **Identification** - Includes product identifier; manufacturer name, address, phone number; emergency phone number; recommended use; and restrictions on use.
2. **Hazard(s) Identification** - Includes all hazards regarding the chemical.
3. **Composition/Information on Ingredients** - Includes information on chemical ingredients and trade secret claims.
4. **First-Aid Measures** - Includes important symptoms and required treatment.
5. **Fire-Fighting Measures** - Lists suitable extinguishing techniques, proper extinguisher equipment, and chemical hazards from fire.
6. **Accidental Release Measures** - Lists emergency procedures, protective equipment, proper methods of containment, and cleanup.
7. **Handling and Storage** - Lists precautions for safe handling and storage (including incompatibilities).
8. **Exposure Controls/Personal Protection** - Lists OSHA's Permissible Exposure Limits (PELs), Threshold Limit Values (TLVs), appropriate engineering controls, and Personal Protective Equipment (PPE).
9. **Physical and chemical properties** - Lists the chemical's characteristics.
10. **Stability and reactivity** - Lists chemical stability and reactivity.
11. **Toxicological information** - Includes routes of entry into the body, related symptoms (acute and chronic), and numerical measures of toxicity.
12. **Ecological information** - (Not OSHA Required)
13. **Disposal considerations** - (Not OSHA Required)
14. **Transport information** - (Not OSHA Required)
15. **Regulatory information** - (Not OSHA Required)
16. **Other information** – Includes date of preparation or last revision.

Assembling & Distributing SDS

The Safety Director will conduct a company-wide inventory of all hazardous chemicals used, obtain copies of the most current SDS for each, assemble them in an organized fashion within a binder, and then create a Hazardous Chemical List that displays the order of these documents. This list will then be placed at the front of the binder along with a copy of this policy. The Hazardous Chemical List shall have the same name as shown on its corresponding SDS.

Chemical manufacturers are responsible for developing SDSs. If the most recent copy of an SDS cannot be determined or obtained by the Safety Director, they shall contact the manufacturer to confirm the most recent version and/or submit a written request for the most recent version.

Employees can call Verisk 3E at 1-800-360-3220 for access to chemical SDS' 24-hours a day. Hardcopies of these materials will also be located in our warehouse and available upon request by our Superintendents for them to keep on the jobsite. Information stored on jobsites shall be stored in a conspicuous location that remains accessible to all employees.

Updating Information

Superintendents shall watch for new chemicals brought onto the jobsite, place a copy of the new SDS in the SDS binder (if one is required onsite), update the Hazardous Chemical List, and send a copy of the SDS to the Safety Director.

When the Safety Director receives a new SDS they shall update the master SDS binder and Hazardous Chemical List, and forward a copy to all other company Superintendents for them to incorporate into their hardcopy binders.

Non-Routine Tasks

Foremen will conduct a formal Job Hazard Analysis (JHA) daily and review the results with all crew members prior to commencing work. If they identify a non-routine task that could involve potential exposure to a hazardous substance, they shall notify their Superintendent and/or the Safety Director before starting work.

The Superintendent and/or Safety Director will then review the JHA to make sure all potential hazards and necessary precautions have been identified. Employees will be informed and trained on non-routine tasks where workers could be exposed to hazards associated with chemicals.

Multi-Employer Worksites

Miller Pipeline Superintendents and employees will maintain open lines of communication with other employers conducting work on or near our jobsites. If our employees ever conduct work that could potentially expose their employees to a hazardous chemical, then our Superintendent shall notify all other employees in the area of the hazards involved and precautions they may need to take. If their employees are noticed working with chemicals that we do not have knowledge about (especially if they are wearing PPE), our Superintendent shall request a copy of the SDS for review and take action accordingly. Where employees must travel between work places during a work shift (multi-job sites), the written program may be kept at a primary job site. If there is no primary, then the program shall be sent with employees.

All Miller Pipeline subcontractors will be required to provide an SDS to our Superintendents for each hazardous chemical they plan to bring on our jobsite.

Spill Response Procedures

Miller Pipeline may handle clean-up and disposal activities for small spills of low hazard chemicals. This process will involve referring to the SDS and Miller Pipeline's Spill Prevention and Response Plan

for instruction, putting on all required PPE, cleaning with absorbent supplies, putting contaminated supplies & PPE in a sealed container, and having a licensed hazardous waste hauler dispose of the items.

If a large spill occurs or a high hazard chemical is spilled, the local branch of the Environmental Protection Agency (EPA) will be contacted for direction on proper spill response and disposal procedures.

In the case of an employee(s) being exposed to a chemical by contact with skin, that employee shall immediately rinse the exposed areas with constant cold water for at least 5 minutes. Any employee who is splashed in the eyes with a caustic or acid should rinse their eyes with tepid water or eye wash solution for at least 15 minutes prior to seeking medical attention.

Training Requirements

All employees will be trained on the common physical and health hazards of chemicals, how to obtain and read an SDS, how to understand the GHS labeling system, protective measures, safe work practices, methods for detecting exposure, emergency responses, and other details of this policy by the Safety Director during Safety Orientation and annually thereafter.

If there are employees who would have difficulty in understanding the training material presented in English, then the company will provide the training in the employee's native language through the use of an interpreter and basic instruction written in their native language.

Hearing Conservation

Purpose

Identify and control high levels of noise that could be hazardous to employees, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This program will be administered in all areas that equals or exceeds an 8 hour Time Weighted Average of 85 decibels, or whenever an employee is exposed to an impact sound at or above 130 decibels.

Definitions

Action Level: An 8 hour Time Weighted Average of 85 decibels or a dose of fifty percent.

Decibels (dB): This symbol is used for expressing the relative intensity of sounds. Zero (0) represents the average least perceptible sound to approximately 130 for the average pain threshold.

Time Weighted Average (TWA): Averaged decibels over an eight hour time period through the usage of a noise dosimeter or sound level meter.

Standard Threshold Shift: Change in hearing threshold relative to the baseline audiogram of an average of 10 decibels or more at 2000, 3000, and 4000 Hz in either ear.

Responsibilities

Safety Director

Oversees the complete implementation of this policy by working with all levels of employees, designated healthcare facility and possibly a certified competent person who will conduct all monitoring activities.

Re-evaluates noise levels whenever new equipment is purchased, or set up is changed in a manner that is believed to raise the noise level.

Coordinates all medical examinations with designated healthcare facility.

Conducts training for all employees who are exposed to noise at or above an 8-hour time-weighted average of 85 decibels.

Foreman

Provides and enforces the use of hearing protection for all employees exposed to sound levels exceeding OSHA permissible noise exposures.

Post "Hearing Protection Required" signs at the entrance of areas where hearing protectors are required for use.

Employees

Notify Foreman if noise levels are believed to exceed OSHA permissible standards.

Wear personal hearing protection when the noise exposure exceeds 85 decibels over an eight (8) hour time weighted average (TWA).

Procedures

Designation of Responsibility

The Safety Director is responsible for overseeing the complete implementation of this policy by working with all levels of employees, designated healthcare facility and possibly a certified competent person who will conduct all monitoring activities.

Monitoring Sound Levels

A certified competent person will monitor any area of a job site that is believed to reach or exceed the action level. This monitoring will include the use of a sound level meter or a dosimeter. All equipment will be properly calibrated prior to conducting monitoring procedures. The Safety Director will re-evaluate noise levels whenever new equipment is purchased, or set up is changed in a manner that is believed to raise the noise level.

The following informational chart may be used when determining if an operation meets or exceeds the action level:

DURATION OF EXPOSURE	SOUND LEVEL
8 hours	90 decibels
6 hours	92 decibels
4 hours	95 decibels
3 hours	97 decibels
2 hours	100 decibels
1.5 hours	102 decibels
1 hour	105 decibels
30 minutes	110 decibels
15 minutes	115 decibels

All employees who conduct work in an area where noise monitoring is conducted will be offered a copy of the monitoring results.

Methods of Control

All monitoring results will be reviewed by the Safety Director. Upon receiving results that indicate noise levels to be above the action level, the Safety Director will determine which of the following control methods will be utilized to reduce or eliminate the hazard:

The Safety Director will first determine if any means of **engineering** the problem out are possible. Some of these means may include such things as eliminating the job all together, shortening the length of the job, or installing barriers to reduce noise levels.

If engineering controls are not feasible, then **administrative** controls will be taken into consideration. This type of control would include such activity as using job rotation.

Only when it is not feasible for management to implement a type of engineering or administrative control will **PPE** be used as the primary control method.

Hearing Protectors

"Hearing Protection Required" signs will be posted by the Foreman in areas where hearing protectors are required for use.

Hearing protection will be provided and recommended for those employees who are exposed to noise that exceeds the action level, but does not exceed an 8 hour TWA at or above 90 dB.

Hearing protection will be provided and enforced for those employees who are exposed to noise that exceeds an 8 hour TWA at or above 90 dB.

Hearing protection will be provided to employees at no charge. Employees will be offered an option of choosing between two different styles of ear plugs. Miller Pipeline shall evaluate hearing protection for the specific noise environments in which the protector will be used.

The Foreman will supply and enforce the use of hearing protectors for Miller Pipeline employees, and any other company's employees that are in the area.

Audiometric Testing

All employees who conduct work that involves noise levels that exceed the action level will be issued an audiogram, at no charge, by a licensed physician of a designated healthcare facility.

Within 6 months of an employee's first exposure at or above the action level, a valid baseline audiogram shall be conducted. When a mobile van is used, the baseline shall be established within one year. Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet the requirement. Employees shall also be notified to avoid high levels of noise.

Audiometric testing will be conducted at least annually to all employees exposed to sound levels exceeding the action level. The results of each individual's annual audiogram will be compared to their baseline audiogram in order to determine if a baseline shift has occurred. Each employee will be provided with a copy of the results.

If an annual test implies that a baseline shift has occurred, Miller Pipeline may deem a re-test necessary within 30 days of the produced results. If the final resolution determines that a baseline shift has occurred, then the job function or work area identified to contain high noise levels will be evaluated to determine feasible methods of implementing engineering controls or other means of reducing the duration of exposure below the action level. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the employee shall be informed of this fact in writing, within 21 days of the determination.

Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, the employer shall ensure that employees already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary. The employee shall be referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the employer suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.

Recordkeeping Requirements

The measurements of all monitoring activities will be documented and maintained for two years.

All audiometric test records will consist of the employee's name and job classification, date of the audiogram, the examiner's name, date of the last acoustic or exhaustive calibration of the audiometer, and the employee's most recent noise exposure assessment. These records will be maintained for the duration of the affected employee's employment.

All records will be provided upon request to employees, former employees, representatives designated by the employee and the Assistant Secretary.

If ceasing to do business, Miller Pipeline will transfer all records to the successor employer, and the successor employer should retain them for the remainder of the period.

Training Requirements

All employees will be trained on the hazards of loud noise and reporting procedures during Safety Orientation. Employees shall be properly trained in the use, care & fitting of protectors. The training shall be repeated annually for each employee exposed to noise at or above an 8-hour TWA of 85 decibels. Training shall be updated consistent to changes in PPE and work processes.

Housekeeping & Sanitation

Purpose

Identify and control effective methods of maintaining proper housekeeping, availability of drinking water and sanitation, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline.

Definitions

Potable Water – Water that meets the quality standards prescribed in the U.S. Public Health Service, or water, which is approved, for drinking purposes by the state or local authority having jurisdiction.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman

Enforces the guidelines addressed in this policy.

Employees

Maintaining good housekeeping in their assigned work areas throughout the day and conducting a brief inspection prior to ending work each day.

Procedures

Proper Housekeeping

Employees are responsible for maintaining proper housekeeping of their work area throughout each workday. An informal inspection will be performed by each employee to organize work areas prior to taking lunch, and before leaving for the day.

All tools, cords, hoses or any other equipment that is not in use and likely to cause a tripping hazard will be removed from sidewalks, and work areas. All cords and hoses in use shall be routed out of traffic areas.

Employees will remove all protruding nails, screws or staples from construction materials, scrap, and debris, and keep work areas, passageways, stairs, in and around buildings or other structures clear from such hazards.

All combustible scrap and debris will be removed at regular intervals during the course of construction. Safe means will be provided to facilitate such removal (i.e. proper containers and material handling).

Separate containers will be provided for the collection of general trash, flammables, and waste. The containers designated to flammables will be of an approved type rated for fire and equipped with a lid. The contents of each container will be emptied on a regular basis and removed from the job site. Employees are encouraged to properly segregate recyclable materials.

The areas designated for the storage of containers and all other materials must be free from any potential hazards. These hazards include fire, explosion, tripping or harboring of rats or other pests.

Secure all materials that can blow away in high winds which can cause bodily injury or property damage (especially rooftops, open structures, open lots, etc.)

Waste materials should be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.

Take precautions to ensure no construction debris leaves (i.e. blown or dropped) the construction area. This could interrupt work being done by grounds keepers, other contractors, or possibly cause injury to the general public.

Hazardous Waste

No material identified as hazardous waste will be placed in dumpsters or be allowed to enter the environment (i.e. pouring down a drain, sewer, ditch, or onto the ground, etc.).

All hazardous waste will be lawfully disposed of through a licensed Hazardous Waste Hauler.

Hazardous waste containers will be labeled accordingly.

Manifests will be appropriately processed and copies will be maintained for at least 3-years.

Hazardous waste spills or releases that contaminate the environment will be immediately reported to the local branch of the Environmental Protection Agency (EPA).

Sanitation

Receptacles for waste food will be covered and maintained in sanitary condition.

Beverages and food will not be stored or consumed in a toilet room, or in any area exposed to toxic chemicals. All hazardous chemicals and waste products will be kept away from break areas.

When only one person at a time uses a toilet room and the door can be locked from the inside, then only one toilet room may be provided. If this is not the case, then separate toilet rooms will be provided for each sex. Toilet rooms will be provided for employees according to the following table:

NUMBER OF EMPLOYEES	MINIMUM NUMBER OF ROOMS
20 or less	1 Toilet Seat & 1 Urinal
20 or more	1 Toilet Seat & 1 Urinal per 40 workers
200 or more	1 Toilet Seat & 1 Urinal per 50 workers

Wash Facilities

Whenever employees are engaged in the application of paints, coatings, herbicides, insecticides or other operations where contaminants may be harmful, adequate wash facilities will be readily available. These facilities will be maintained in sanitary condition, with an adequate supply of soap, hand towels and tepid water.

Employees working with toxic substances will be required to thoroughly wash, and change clothes if necessary, before eating, drinking or smoking.

Potable Water

An adequate supply of potable water will be provided on all job sites. This water will be kept in a container capable of being tightly closed and equipped with a tap. These containers will be marked with the contents, and will not be used for any other purpose. Water will not be dipped from the containers, and an adequate supply of clean drinking cups will be provided as well.

Smoking Policy

Employees will be permitted to smoke and use tobacco only on projects where the client allows it. Smoking on projects will only be allowed in areas that are free from flammable and combustible materials, and are at least 20 feet from such areas, and at least 50' from excavations.

Training Requirements

This section will be covered during Safety Orientation. Employees will be instructed on the proper disposal method for wastes. This may include general instruction on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees will be trained to ensure proper disposal.

Industrial Hygiene Plan

Purpose

To identify all materials used by the company that could potentially expose employees to health hazards, & establish a plan for assessing the risk of these exposures.

Scope

This policy applies to all company employees who work with or around chemical products that are identified in this Industrial Hygiene Plan.

Definitions

PERMISSIBLE EXPOSURE LIMIT (PEL): The maximum amount of a hazardous substance that an individual can be exposed to over an 8-hour time weighted average.

OVER-EXPOSURE INCIDENT: An occurrence that involves an employee being exposed to a hazardous chemical or substance at or above the "Permissible Exposure Limit" (PEL) for that chemical/substance.

Responsibilities

Safety Director

Establish and update the company's Chemical Inventory List, evaluate all chemicals for potential over-exposure, rank exposure risks as defined by this plan, coordinate hygiene activities, maintain monitoring documentation, educate all employees on monitoring results, & create additional programs for each chemical and/or product that is confirmed to create an over-exposure.

Superintendent

Immediately notify the Safety Director whenever a task changes or a new task is introduced that could involve potential exposure to a hazardous substance.

Employees

Monitor all work activities for the importation of new chemical products that could expose employees to harmful substances & notify the Safety Director immediately.

Procedures

Hazard Anticipation & Recognition

The Safety Director will work with management, supervision, & field personnel to create a comprehensive list of all chemical products that are used by the company. This will be the same list that is required by the "Hazard Communication" plan, called our "Chemical Inventory List".

After assembling the *Chemical Inventory List*, the Safety Director will assess each listed product for any chemical that could cause an over-exposure incident. Such chemicals will be handled as indicated by the subsequent sections of this plan.

All employees will be instructed during Safety Orientation to notify the Safety Director whenever a new chemical product is brought into the workplace. Upon notification the Safety Director will add the product to the *Chemical Inventory List*, assess it for potential over-exposure, and handle it as indicated by the subsequent sections of this plan. In order to make sure that all chemicals are identified & assessed (if employees fail to report new chemicals), the SQC's and Safety Managers will look for new chemicals when they conduct their regular scheduled safety inspections.

In addition, the Safety Director will proactively evaluate common work tasks for exposure to any type of substance that could be hazardous to health. Tasks that are of concern will be handled as indicated in the "Hazardous Substances" section of this plan.

Superintendents are responsible for notifying the Safety Director whenever a task changes or a new task is introduced.

Risk Evaluation & Prioritization

When a hazardous chemical/substance is identified that could potentially cause an over-exposure incident, the Safety Director the ACGIH "Qualitative Exposure Assessment" guidelines to evaluate each task that involves potential exposure to the chemical/substance.

When performing these evaluations, the Safety Director will rank the risk of each task & determine its priority for atmospheric monitoring. Upon determining a task's priority, it will be added to the "Monitoring Schedule" (located in this plan).

Exposure Assessment & Monitoring

When tasks are added to the *Monitoring Schedule* found in this plan, the Safety Director will secure a Competent Person who is educated & experienced in industrial hygiene monitoring techniques, which will perform atmospheric monitoring according to the timelines indicated on the schedule.

Individuals who conduct this monitoring must use the appropriate type of equipment, and they must calibrate this equipment prior to each use as directed by the manufacturer.

Atmospheric monitoring will be performed for each individual task that involves potential exposure & during times and/or activities where peak exposure is likely.

Summary and lab reports that are generated from atmospheric monitoring activities will be maintained at the Miller Pipeline corporate office for a period of not less than 30-years.

All affected employees will be notified (in writing) of all atmospheric monitoring results. This includes any employee who was involved with the monitoring & all employees who could potentially be exposed to the chemical. Notification must be made within 5-days of receiving the results.

Hazard Prevention & Control

Upon identifying a hazardous chemical or substance, the company will attempt to take all necessary precautions to prevent employees from being over-exposed until atmospheric monitoring results are received & examined. Such precautions may include, but are not limited to:

- Not allowing employees to use a chemical product.
- Not allowing employees to perform certain tasks.
- Working in a better ventilated location.
- Using mechanical ventilation.
- Wearing an appropriate type of respiratory protection.
- Donning other forms of PPE.

If results indicate that employees are likely to be over-exposed to a hazardous chemical/substance, then a stand-alone policy will be developed to control exposure. These policies will include detail on training, engineering controls, administrative controls, PPE, medical surveillance, recordkeeping, & periodic atmospheric monitoring.

ACGIH Qualitative Exposure Assessment Guidelines

The desired end result of using these guidelines is to identify the “Qualitative Priority” of monitoring a task for a hazardous chemical or substance. In order to get to this end result, three (3) different criteria must be evaluated and then combined. The following sections explain this evaluation process.

AGENT RANKING

The first criteria to determine is the “Agent Ranking”. To determine the *Agent Ranking*, the first step is to identify the chemical/substance PEL and plug it into the chart below. Then reference the notes below the chart to make sure the proper ranking has been selected.

DUSTS, MISTS & FUMES		VAPORS & GASES	
TWA RANGE	RANK	TWA RANGE	RANK
0.00 - 0.10 mg/m ³	Very High	0 – 2 ppm	Very High
0.11 - 0.50 mg/m ³	High	3 – 10 ppm	High
0.51 - 1.00 mg/m ³	Moderate	11 – 100 ppm	Moderate
1.01 - 5.00 mg/m ³	Low	101 – 500 ppm	Low
5.01 - 15.00 mg/m ³	Very Low	>500 ppm	Very Low

NOTES:

If a product contains multiple hazardous chemicals/substances, rank the entire product according to the highest-ranking chemical/substance.

Any product that is a carcinogen, reproductive hazard, highly regulated agent, fiber, or asphyxiate must be ranked as “Very High”, regardless of the chart ranking.

Any product that is a skin sensitizer or strong skin irritant (even if it doesn't have a PEL) must be ranked as “High”, regardless of the chart ranking.

Most physical agents shall be ranked as “High”, regardless of the chart ranking.

Substances with a “skin” notation & a PEL shall be elevated one ranking, if the substance has a ceiling value.

AGENT INTENSITY

The second criterion to determine is the “Agent Intensity”. To determine the *Agent Intensity*, reference the notes section below the chart to determine the chemical/substance proximity & size of source, and then cross-reference the chart.

		SIZE OF SOURCE		
		Point	Limited	Large
PROXIMITY	No Contact	Nil	Nil	Slight
	Near Contact	Slight	Medium	Elevated
	Direct Contact	Slight	Elevated	Significant

NOTES:

NO CONTACT = There is no actual contact with the agent.

NEAR CONTACT = Most of the agent exposure occurs from sources of the agent within the vicinity, although there may be occasional/brief interaction at the source.

DIRECT CONTACT = Most of the exposure occurs because the job involves working directly at the point of generation. This includes jobs with planned regular cycles of direct exposure.

POINT = The agent is confined to a specific small point.

LIMITED = The agent does not extend in all directions.

LARGE = The agent can or has extended in all directions.

EXPOSURE POTENTIAL

The third criterion to determine is the “Exposure Potential”. To determine the *Exposure Potential*, reference the notes section below the chart to determine the frequency of exposure, and then use the *Agent Intensity* rating that was just calculated to cross-reference the chart.

		AGENT INTENSITY				
		Nil	Slight	Medium	Elevated	Significant
FREQUENCY	Minimal	Very Low	Low	Low	Low	Moderate
	Intermittent	Low	Low	Moderate	Moderate	High
	Continuous	Low	Moderate	High	High	Very High

NOTES:

MINIMAL = Less than 15-minutes (total) of activity involving potential contact with the agent over the entire workday.

INTERMITTENT = Periods of at least 15 minutes of potential contact with the agent, interspersed with extensive periods of no contact with the agent.

CONTINUOUS = Working continuously over the workday, with very little time where there is no exposure. This includes brief but frequent cycles, either regularly or sporadically.

QUALITATIVE PRIORITY

Now that the previous three criteria have been evaluated, the “Qualitative Priority” can be determined. To determine the *Qualitative Priority*, first determine if effective engineering controls, PPE, or no controls will be used before monitoring can be conducted. Then find the right chart and use the *Agent Ranking* and *Exposure Potential* to cross-reference the chart. Make sure to look at the notes below the chart for any necessary adjustments.

EFFECTIVE ENGINEERING CONTROLS USED

		EXPOSURE POTENTIAL				
		Very Low	Low	Moderate	High	Very High
AGENT RANKING	Very Low	Nil	Very Low	Low	Low	Moderate
	Low	Nil	Low	Low	Moderate	Moderate
	Moderate	Nil	Low	Low	Moderate	High
	High	Nil	Low	Moderate	Moderate	High
	Very High	Nil	Low	Moderate	High	High

PPE OR MINIMAL ENGINEERING CONTROLS USED

		EXPOSURE POTENTIAL				
		Very Low	Low	Moderate	High	Very High
AGENT RANKING	Very Low	Very Low	Low	Low	Moderate	Moderate
	Low	Low	Moderate	Moderate	High	High
	Moderate	Low	Moderate	High	High	High
	High	Low	Moderate	High	High	Very High
	Very High	Low	Moderate	High	Very High	Very High

NOTES:

For sensitizers & strong skin irritants without a PEL, they should be ranked “Low” if direct contact is occurring, but the employee is wearing PPE. If direct contact is occurring and the employee is not wearing PPE, they should be ranked “High”.

Hazardous Substances

ASBESTOS

Description: A microscopic spear-shaped fiber that is mined from the earth’s surface.

Physical & Health Hazards: Asbestos is a known carcinogen. The inhalation of Asbestos can result in lung cancer & ingestion can result in stomach cancer.

Potential Exposure: Possible exposure at Miller Pipeline, is when coal tar pipe wrap is to be removed and drilling through transite house siding.

Necessary Precautions: All employees will be made aware of asbestos hazards and the potential of exposure when handling coal tar pipe wrap or transite siding, during Safety Orientation. Miller Pipeline does allow trained and authorized employees to remove coal tar pipe wrap and drill through transite house siding; however, necessary protective measures will be taken before doing so such as wearing an N-99 mask, etc.

The following procedures must be followed whenever removing coal tar wrap from piping, unless a sample of the wrap has been tested and confirmed not to contain asbestos:

- Carefully expose the pipe to minimize contact or damage.
- Inspect the coating to ensure it is not loose and likely to become “friable”.
- Prepare tools and materials.
- Put on additional PPE (durable gloves and safety glasses).

- Place plastic sheeting or large pan underneath pipe to catch debris.
- Thoroughly soak coating with soap water.
- Score the pipe with a knife for clean cut ends.
- Remove wrap with chipping hammer and putty knife.
- Spray coating as needed to keep wet during the entire process.
- Pick-up and place any loose debris on the sheeting or in the pan.
- Spray all materials collected in the sheeting/pan once again.
- If using sheeting, tightly roll it inward.
- Place the sheeting or dump debris from pan into garbage bag.
- Clean tools with rags and soap water.
- Place rags and disposable PPE in garbage bag.
- Seal the garbage bag and place it into a 6-mil plastic bag.
- Spray the inside of the 6-mil bag and then place spray bottle inside bag as well.
- Seal 6-mil bag with duct tape.
- Place that 6-mil bag into another 6-mil bag (the materials will be triple bagged at this point).
- Seal that bag with duct tape.
- Apply a warning label on the bag or mark "Danger – Contains Asbestos" on the bag if no label is available for use.
- Ensure an air tight seal has been achieved by gently pushing on bag.
- Give the sealed/labeled bag to the customer for disposal.
- If the customer is not around to give the bag to, keep the bag in a locked area until it can be given to them.

The following procedures must be followed whenever drilling through transite house siding:

- Prepare all tools and materials necessary for the job.
- Put on additional PPE (durable gloves and safety glasses).
- Place a wet sponge or mound of shaving cream over the siding.
- Drill through the sponge/shaving cream.
- Use a clean rag and soap water to clean the siding and tools.
- Place the rags and sponge into a plastic bag and seal it.
- Place that bag into a second bag and seal it.
- Apply a warning label on the bag or mark "Danger – Contains Asbestos" on the bag if no label is available for use.
- Ensure an air tight seal has been achieved by gently pushing on bag.
- Give the sealed/labeled bag to the customer for disposal.
- If the customer is not around to give the bag to, keep the bag in a locked area until it can be given to them.

Monitoring Schedule: This substance is *not* being added to our Monitoring Schedule.

CADMIUM

Description: A metal compound that is produced as a byproduct of mining, smelting, refining and/or recycling other metals, such as zinc, lead, copper, iron & steel.

Physical & Health Hazards: The inhalation of Cadmium fumes or dust can result in kidney damage, bone damage, reproductive damage in females, "Metal Fume Fever" and pulmonary edema. It is also considered to be a probable carcinogen.

Potential Exposure: At this time there are no known company operations that have exposure to the corresponding chemicals listed; however, a, or other excavation in areas known to have these chemicals, could produce exposure at or above the action level or PEL.

Necessary Precautions: Tasks should be evaluated during the planning stage for potential cadmium exposures. When cadmium exposure is possible, we will take the steps below to minimize employee exposure.

Safety glasses and gloves must be worn when performing tasks identified by this plan, and skin must be washed with soap before eating, drinking, smoking, or chewing tobacco. A fully charged 20-pound fire extinguisher must be posted on the jobsite when tasks identified by this plan are performed.

Monitoring Schedule: Our company understands that it is required to determine if any employee may be exposed to a chemical(s) at or above the action level as an eight-hour time-weighted average. If so, we would choose an acceptable method(s) of monitoring and analysis for our initial exposure determination.

We also understand that, after our initial determination, if changes in production, process, control, or personnel occur, we must determine if employees are exposed to higher concentrations of the chemical(s). In this event, work will not commence until employees are trained and educated on the hazards of cadmium, including job-specific hazards.

CRYSTALLINE SILICA

Description: A chemical compound that comes from silicon and is commonly found in glass, sand, quartz, fiber optic cable, & stoneware/porcelain.

Physical & Health Hazards: Silica is classified as a probable carcinogen and can cause fatal health conditions when it becomes airborne.

Potential Exposure: The primary tasks that could expose our employees to crystalline silica, -are drilling, grinding, cutting concrete, or mixing drilling mud/fluid for HDD operations.

Necessary Precautions: Employees shall use a vacuum system with Hepa-filter while drilling or grinding. Employees shall apply water when cutting into concrete. All employees will be made aware of silica hazards during Safety Orientation. Upon being notified that our employees could or have been exposed to a hazardous amount of silica, our Safety Director will assess the situation. At that time atmospheric monitoring may be conducted. Depending on the results, the "Silica" ECP that has already been written. may be implemented.

Monitoring Schedule: This substance is *not* being added to our Monitoring Schedule.

HEXAVALENT CHROMIUM

Description: Metallic compound that is commonly found in chrome & stainless steel. This compound is released whenever it is heated.

Physical & Health Hazards: Hexavalent Chromium is a known carcinogen. It may also cause stomach ulcers when ingested.

Potential Exposure: The only task that could potentially involve exposure to Hexavalent Chromium would be welding or cutting stainless steel.

Necessary Precautions: Miller Pipeline does not typically weld metals that contain chromium. There is a possibility that Stainless steel or similar metal materials could be present in indoor fabrication areas, but field work on natural gas pipelines does not typically involve exposure to Hexavalent Chromium.

Monitoring Schedule: This substance is *not* being added to our Monitoring Schedule.

HYDROGEN SULFIDE

Description: A colorless, flammable, extremely hazardous gas with a “rotten egg” smell. It occurs naturally in crude petroleum, natural gas, and hot springs.

Physical & Health Hazards: At low levels, hydrogen sulfide causes irritation of the eyes, nose and throat. Moderate levels can cause headache, dizziness, nausea, and vomiting, as well as coughing and difficulty in breathing. High levels can cause shock, convulsions, coma, and death.

Potential Exposure: The only task that could potentially involve exposure to Hydrogen Sulfide is constructing, repairing, or working around pipelines that transport products containing H₂S (e.g. natural gas, sewer).

Necessary Precautions: When performing this type of work, a properly calibrated four-gas air monitor will be used continuously to ensure that H₂S remains below acceptable limits. If employees are working inside separate sections of a pipeline, each employee must have their own personal air monitor that alarm when PEL exceeds the preset level of 20 PPM.

If an alarm sounds on an air monitor all employees must immediately exit the work area and are not permitted to re-enter the space until the H₂S is maintained below acceptable limits.

All sources of ignition (e.g. cigarettes, open flames) must be kept at least 20' from areas where H₂S could potentially be present.

Prior to working at a facility that stores or handles H₂S (e.g. refineries), the owner of the facility shall educate all affected Miller Pipeline employees on any site-specific contingency plans.

Monitoring Schedule: This substance is *not* being added to our Monitoring Schedule.

NOISE

Description: A mechanical wave that is composed of different frequencies & commonly transmitted through air or water.

Physical & Health Hazards: Excess levels of noise can cause hearing loss.

Potential Exposure: Our only known tasks that could potentially involve exposure to excess

noise levels (i.e. over an 85 dB Time Weighted Average) are operating a jackhammer, hydrovac work, tamping or working around heavy equipment.

Necessary Precautions: Sound level monitoring has been conducted for these tasks and it was determined that these tasks are above the permissible exposure limit. Therefore, hearing protection is required when performing either task per our Hearing Conservation Plan.

Monitoring Schedule: Monitoring has been completed for these tasks.

VAPORS & MISTS

Description:

Mists are liquid droplets suspended in the air. They are formed from liquid materials by operations such as spraying, splashing, mixing, and cleaning.

Physical & Health Hazards:

Vapors and mists from pipeline primers & epoxy coatings can present a respiratory inhalation, dermal, eye contact, and ingestion hazard to the mixer, applicator(s) of the product(s), and those in the immediate vicinity. Symptoms range from mild irritation for dermal, eye, and inhalation exposures, while ingestion may result in more severe symptoms ranging from abdominal pain to severe vomiting and diarrhea.

Potential Exposure: The tasks that could potentially involve exposure to these substances include employees involved in the mixing and application of pipeline coatings and primers/epoxies for steel pipeline construction and rehabilitation. Due to the varying nature of these products, hazard levels range from low to moderate, depending on the specific product used.

Necessary Precautions: Always mix and apply with adequate ventilation; read all Health Hazards, Precautionary and First Aid Statements, SDS's, and/or product label prior to handling or use. Follow manufacturer recommendations for PPE requirements and product handling. Contact Corporate Safety if you need assistance interpreting the labels and/or requirements.

Monitoring Schedule: All of these substances are being added to our Monitoring Schedule.

WELDING FUMES

Description: A complex mixture of airborne metallic compounds that are created when metal is heated above its boiling point. The composition of welding fumes can vary depending on the metal that is being welded & if the metal is coated or not.

Physical & Health Hazards: The health effects of welding fumes can vary greatly, depending on the material welded, but many metals are known carcinogens & cause serious damage to vital organs.

Potential Exposure: Our only known exposure is respiratory/inhalation hazards when we are welding, cutting, or scaling coated metal substances in poor ventilation environments.

Necessary Precautions: Avoid welding indoors unless local exhaust ventilation is present. Understand what materials are being welded in outdoor environments, and ensure that natural ventilation is adequate. Never weld in a confined space without first contacting Corporate Safety to determine if work is safe to perform and if so, the respiratory protection/ventilation requirements that may be necessary.

Monitoring Schedule: This substance is *not* being added to our Monitoring Schedule.

Monitoring Schedule

#	TASK	SUBSTANCE	PRIORITY	MONITORING
1	Drilling Transite Siding	Asbestos	Medium	No
2	Scaling pipeline surfaces	Cadmium, Lead	High	No
3	Welding (Open Air)	Total Welding Fumes, Various Others	High	No
4	Sewer Entry	Hydrogen Sulfide (H ₂ S)	High	To be Completed
5	Removing Mercury Regulators	Mercury	High	No
6	Soil Excavation	Benzene, Napthalene	High	To Be Completed
7	Working Around Blowing Gas in Excavation	Natural Gas (Methane)	High	To be Completed
8	Working Near Generators	Noise, Co ₂ (Carbon Dioxide)	High	To be Completed
9	Operating Multiple Vacuums	Noise	Medium	Completed
10	Purging Pipelines	Nitrogen	High	No
11	Silica-Generating Activities (see Silica ECP)	Crystalline Silica	High	Completed
12	Mixing/applying pipeline coating	Varies by type	High	Completed

Training Requirements

Awareness training will be given to all employees who could potentially be exposed to a hazardous substance listed in this plan. This training shall take place before employees are exposed to such hazards and must consist of the following topics:

- A brief description of the chemical/substance.
- Products it can be found in.
- Common tasks that could involve exposure.
- Associated physical & health hazards.
- Routes of entry into the body.
- Measures for preventing over-exposure.

Loading & Unloading Pipe

Purpose

Provide safe and consistent methods for loading and securement, for transportation to the destination, and for unloading and stockpiling of pipe and other cylindrical stock at the destination.

Scope

The loading and unloading of pipe/cylindrical stock, means the moving or handling of pipe, by lifting, lowering, pushing, carrying, holding, or restraining. The movement of pipe may be hazardous, and the level of hazard depends on the type of pipe being handled, what the task is, and what the conditions are at the workplace or work site. The location of the loading or unloading may present unique circumstances that should be evaluated and planned prior to the activity.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman

Enforce guidelines governing the safe loading, unloading, inspection, and handling of pipe/cylindrical stock.

Confirm that personnel involved in the activity/activities are aware of the weight of the load/cylindrical stock.

Monitor lifting/loading activities to verify safe loading/lifting capacities of the equipment, and rigging are not exceeded. This applies to all equipment involved.

Employees

Follow established procedures/protocols associated with the operations of loading and unloading pipe/cylindrical stock.

Operators shall be responsible for determining how many joints of pipe can be safely maneuvered/carried at one time, based on: characteristics of the load (e.g. weight, diameter, etc.); characteristics of the rigging equipment (e.g. engineered load rating); Adherence to the safe operating practices of lifting/transportation equipment in accordance with the manufacturer's instructions (e.g. engineered load rating chart, vehicle/trailer ratings, environmental factors such as slope, weather, etc.)

Visually inspect all rigging prior to use to determine if it is suitable for the lifting operations.

Verify that stakes/uprights in pockets on trailer edge, chocks on deck, strapping/tie-downs or other similar devices are of sufficient width and padded to prevent damage to or shift of the pipe/cylindrical stock when applicable.

Inspect all pipe/cylindrical stock to ensure it is properly secured so as to prevent unplanned movement during loading/unloading activities.

Procedures

Hazard Assessment

Hazard assessments are performed to identify pipe loading and unloading-related hazards, and to recommend the appropriate remedy or mitigation. When completing a Job Hazard Analysis, the following should be considered:

- Weight of the load lifted.
- Range of the lift.
- Location of the pipe.
- Size and shape of the pipe.
- Number and frequency of lifts performed.
- Proper selection of equipment for the loading and unloading tasks.
- Pinch points/line-of-fire area.
- Overloaded or improperly loaded (poor weight distribution) trucks/rails/trailers.
- Uneven and/or shifted loads reducing the overall stability of the load/vehicle.
- Missing or damaged strapping/tie-downs.
- Requirement for stanchions on trailers/trucks.
- Potential energy stored in load.
- Means of securement (tie down strap, banding, etc.).
- Proximity of the operation to overhead power lines or other structures.
- Presence of ice, snow, or other environmental hazards.
- Worker safety when working from an elevated position.
- Proper selection of lifting rigging (chains, slings, straps, vacu-lifts, etc.).
- Qualified operators must run the lifting equipment.
- Change of ground conditions as it relates to equipment stability

Preparation and Set-up

To facilitate the loading and unloading of pipe, position the trailer in a location that is as level as possible, set the parking brake, and chock the wheels. This will reduce the potential of any movement that could cause the pipe/cylindrical stock to shift and/or roll off the trailer.

When approaching the trailer to be loaded, the operator centers the pipe with the trailer so that pipe is evenly distributed over the trailer deck when pipe/cylindrical stock is less than or equal to the length of the trailer being loaded.

Trailers need to be of sufficient length and width to eliminate excessive overhang.

In the event the trailer has an upward curve, be sure the bunks or 4 x 4 timbers are appropriately placed to prevent teetering of the pipe.

Prior to unstrapping load(s), always ensure that stakes/uprights in pockets on trailer edge, chocks on deck, or others similar devices are substantial enough, high enough and securely in place to prevent the highest layer of material from rolling off the trailer deck when the straps/load securement/banding is removed.

Loading & Unloading Trucks & Trailers

All employees involved in the loading/unloading tasks must remain alert and work to prevent anyone from walking under suspended loads or being in the vicinity of lines holding a load.

- Never position any body part under a suspended load.
- Never stand under or downhill of hoisted pipe/cylindrical stock.
- Be alert for crane/spotter warning sound.
- A barricaded area of twenty to thirty feet (20' to 30') should be maintained from each end of the pipe/cylindrical stock while loading/unloading tasks are in progress. Exceptions may be made if taglines are utilized.

Rigging devices used to off-load pipe/cylindrical stock may consist of but not be limited to vacuum lift, sling, cables with lifting shoes, etc. Where necessary a spreader bar will be utilized to minimize the induced stresses on the pipe/cylindrical stock.

Taglines shall be used whenever handling loads in high winds or when loads could sway during the lift. If taglines are used, spotters shall ensure that the tag lines are made of nonconductive material. Tag lines must be dry and in good condition. Never wrap a tag line around any part of your body, and wear gloves.

It is the operator's responsibility to identify the appropriate rigging to be used for the lift based on the weight and length of the pipe. If chains are used to lift loads, they must be grade 80 or higher.

Drivers shall check all load securement devices.

No person will place themselves between the load and the truck/trailer/lifting equipment or any other pinch point locations that may arise while loading/offloading (i.e. boulder, tree, concrete retaining wall, etc.)

No person will work on the opposite side of the trailer other than the operator seated in the cab of the backstop forklift.

When applicable, the crane operator will sound crane alarm prior to and during pipe movement (as necessary) to alert personnel. The Crane operator should also sound the alarm during movement as necessary.

During loading and unloading, Safe/Controlled Access Zones (Safety Zones) will be identified and established. Caution Cones/delineators must be put in place to delineate/identify the exclusion (controlled access) zones.

If only one worker is on site, they will verify that no one is located around the controlled access/exclusion zone, or in the travel path of the vehicle, then will release the driver.

If only the driver and operator are on site, a cone indicator can still be used to prevent a driver from coming into the operating area before the previous truck has departed.

If only one signal person/spotter is on site, a cone should be placed at the side of the access road indicating where the next truck will stop prior to entering the work area.

During loading and unloading, set the parking brake, and use wheel chocks to block the wheels prior to any handling of material.

If unauthorized personnel enter the loading area, the loader operator must shut down all loading activities immediately.

If unloading alongside an existing trench, no person should ever place themselves between the load and the trench.

Skids or other foreign objects should never be inserted into the end of a pipe joint to "balance" the load. If out of balance, the load should be returned to its original position, made secure, and the rigging or vacuum lift re-positioned to achieve proper balance.

Keep all additional load straps in place during unloading until the section of the uppermost tier of a stacked load has been completed. The straps should be utilized to keep the remaining load secure in place, as well as, a means to cradle the pipe/cylindrical stock to prevent rolling, (i.e. bunks, double-cut bunks with chocks secured on top and bottom or bolsters) should be left in place. Upon completion of the unloading of first tier, the next section of that tier or the second tier can then be unstrapped and unloaded.

When loading/unloading pipe/cylindrical stock during wet/snowy conditions on an inclined surface take precautions to restrain the downhill end of pipe/cylindrical stock from sliding off of truck/trailer.

When utilizing a forklift, before releasing the joint of pipe, place the forks as low as possible to avoid dropping the pipe joint(s) onto the deck.

Always position work activities on the uphill side of the trailer and/or material when a level surface is not available.

The load(s) must be inspected by the driver to confirm that the load is evenly distributed on the trailer and adequately secured. Any and all adjustments should be made before leaving the yard/work area.

Once the load is to leave the yard or enter the public roadway, the load must be secured with the appropriate number of rated straps per the DOT and/or other Regulatory Requirements.

Once a truck has arrived at offloading location, an Operator will sound horn where truck needs to stop. At this point the driver will set all parking brakes on the truck and trailer, exit the vehicle, and securely chock the wheels.

At no time will truck drivers be allowed to unstrap loads when they are alone or prior to being directed to do so by the Foreman (or assigned designee).

Always position work activities on the uphill side of the trailer and/or material when a level surface is not available.

Before unloading any pipe, the lay down area should be inspected and prepared. Confirm that the worksite is free of debris, holes and objects that could obstruct the loading or unloading process, damage the pipe, or cause slips, trips and falls.

Visually inspect the loaded trailer; check that the bottom pipe sections are properly seated in their cradle and that none of the chocks are missing or loose. Check that the above pipe sections are properly nested. Confirm that chocks are in place and secure between the joints of pipe. Stop all work immediately and correct any hazards identified before releasing the tie down straps.

Ensure stabilization protocol for lower tiers of pipe comply with the loading protocol stated above for stacked loading and pyramid loading and ensure chocks, cribbing, tie downs and side truck stakes are sufficiently robust and adequate height to prevent inadvertent loss of lower tiers of the load as a result of a pipe shift. Add additional securities as necessary prior to removing transport ratchets/straps from the trailer.

When releasing the ratchets/straps on the trailer, confirm that the pry bar is in the holes securely and that fingers are clear when releasing the catch on the ratchet to release it.

Forklift equipment should not be used to remove coated pipe that is in a pyramid configuration (nested in tiers).

Driver and ground crew (if approved by driver) will remove strapping from load and all ground crew members will proceed to the previously designated safe zone or, in front of truck. Once all ground crew members are clear, the spotter/signal person will signal the operator to commence offloading pipe from truck and place on wooden skids with pads to protect coating when needed.

When permissible (i.e. drill stem, flume pipe, or other uncoated materials/cylindrical stock) release the joint(s) of pipe slowly to ensure that they roll in to place gently to prevent any damage

Training Requirements

This section will be covered during Safety Orientation. Employees will be instructed on the proper procedures for loading and unloading pipe from trucks and trailers.

Lockout/Tagout

Purpose

Identify the proper procedures for controlling hazardous energy, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline who conduct lockout tagout as part of their normal work activities.

Definitions

Affected Employee: An employee who may operate equipment subject to lockout or who works in an area where lockout is used.

Authorized Employee: An employee who locks out and tags out equipment in order to perform servicing or maintenance on the equipment.

Lockout: The placement of a lockout device on an energy-isolating device, in accordance with an established procedure, to ensure 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, either key or combination type, to hold an energy isolating device in position to prevent the energizing of machine or equipment.

Potential Energy: May include any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

Servicing and/or Maintenance: Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. The activities include lubrication, cleaning or un-jamming of machines or equipment and making adjustments or tool changes, where the employee may be exposed to the unexpected startup of the equipment or release of hazardous energy.

Tagout: The placement of a tagout on the energy source that indicates the equipment being controlled may not be operated.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman

Enforces the guidelines addressed in this policy.

Oversees the emergency removal of locking devices, and communicates these procedures to the employees who applied them immediately upon returning to the job site.

Procedures

Energy Control Procedures

Whenever the servicing or maintenance of equipment in which unexpected start-up or release of stored energy could cause injury, the following detailed procedures will be followed by trained and authorized personnel:

STEP 1: Preparation

Lockout/tagout procedures will only be carried out by "authorized employees". Before implementing the lockout/tagout procedure, you will fully understand the:

- type and magnitude of the energy to be controlled
- methods of controlling the hazardous energy
- means of controlling the hazardous energy

STEP 2: Notification

Before applying lockout devices and tags, notify all affected employees that the energy control procedure is going to be used and the reasons why.

STEP 3: Shutdown

Shut down equipment by using normal procedures. When the equipment is part of a production process, all parts of the operation will be considered. Before an authorized or affected employee turns off a machine or equipment, the authorized employee shall have knowledge of the type & magnitude of the energy, the hazards of the energy to be controlled, & the methods or means to control the energy.

The machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.

STEP 4: Isolation

Locate all of the energy isolating devices. Operate the energy isolating devices so that the equipment is completely isolated from the energy source.

STEP 5: Attachment of Locks and Tags

Attach locks to the energy-isolating device so the device is held in the "safe" or "off" position. Place the tag in a position that will be immediately obvious to anyone attempting to operate the device.

STEP 6: Control Stored and Residual Energy

Relieve, disconnect and restrain all stored or residual energy. This energy will be dissipated or restrained. Some common methods to restrain or dissipate stored energy are repositioning, blocking, and bleeding down systems.

If there is a possibility of reaccumulation of stored energy level, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.

STEP 7: Verification

Check to be sure that all personnel are in a safe location. Verify that the equipment is properly isolated, and all hazardous energy is safely controlled. This should be accomplished by attempting to start the equipment by normal means of operation. Return operating controls to the "neutral" or "off" position after the test. Once you are sure the energy is isolated and safely controlled, proceed with the work activities.

Control Removal Procedures

STEP 1: Inspection

Inspect the work area for the removal of all tools, parts, and cleaning supplies.

STEP 2: Notification

Notify all affected employees that the lockout devices are being removed.

STEP 3: Guard Attachment

Inspect the equipment and ensure that all guards are in place and properly secured.

STEP 4: Power Restoration

Restore the power to the equipment by removing all locking devices and placing all energy isolating devices back in the on position.

STEP 5: Startup

Energize the equipment using normal startup procedures.

STEP 6: Quality Check

Check the equipment to make sure that it operates safely before allowing another employee to conduct work.

Authorization of Procedure

Only employees who have been designated by management and trained to the guidelines of this policy and safe working procedures associated with controlling hazardous energy will be allowed to practice lockout tagout. Each authorized employee will be re-trained whenever a new job, equipment or process is introduced.

Application and Removal

Equipment will be properly isolated from all energy sources and rendered inoperative prior to performing any work whenever unexpected energization could occur and cause injury.

Only the person who applied it will be able to remove the locking device, unless there is an emergency requiring immediate removal. The key will only be in the possession of the lock's owner. The lockout and tagout device shall indicate the identity of the employee applying the device.

If a lock will be removed and the employee is not to be found to perform removal, then an authorized Foreman will remove the lock by first placing a new lock on the clasp, and then removing the original lock. The employee who applied the original lock will be notified immediately upon returning to the job site.

Group Lockout Procedures

When the scope of Lockout/Tagout necessitates the use of a “group lockout” (e.g., the use of a lock box which contains the one key that controls the lock on devices), an authorized employee will be assigned the primary responsibility to oversee and coordinate group lockout procedures.

Each employee will place their own lock on the “group lockout” box. During shift changes, the employees coming on shift will place their own lock on the “group lockout” box, and sign in on the group lockout sign in/sign out sheet. Those employees leaving shall remove their locks and sign out on the group lockout sign in/sign out sheet. It is the responsibility of the authorized person or supervisor to ensure continuity of lockout or tagout procedures and proper use of the sign in/sign out sheet for any group lockout activity. This person shall not remove the group LOTO device until each employee in the group has removed his/her personal device.

The authorized employee should ascertain the exposure status of individual group members. Each employee shall attach a personal lockout or tagout device to the group's device while he/she is working & then remove it when finished. During shift change or personnel changes, there should be specific procedures to ensure the continuity of lockout or tagout procedures. Documentation should be specific.

Equipment

Only the locking devices issued by Miller Pipeline will be used for lockout tagout. These locking devices will be uniform in size, color, and shape.

Locks will remain in good condition and able to withstand at least 50 pounds of pressure. Tags will be laminated to remain legible and in good operating condition regardless of weather conditions.

Tags will accompany all locking devices.

Legends will be included on all tagging devices, and completed prior to use. These legends will consist of employee name, company, date and purpose.

Inspection

Authorized employees will visually inspect locking devices prior to initial use each working day. The Safety Director will inspect all locking devices on an annual basis. This inspection will be documented and maintained on file. This inspection will consist of strength testing, physical defects and capability of application and removal.

All written procedures will be evaluated for their effectiveness on an annual basis. The evaluation will be conducted by the Safety Director. A certified review of the inspection including date, equipment, employees & the inspector should be documented.

Training Requirements

The training must include recognition of hazardous energy source, type & magnitude of energy available, methods & means necessary for energy isolation & control. The training should also include that a tag is not to be removed without authorization. The tag is never to be ignored or defeated in any way.

Affected employees will be trained on the purpose of lockout tagout, the equipment that will be used on company job sites, those employees who are designated as authorized level trained employees, and the importance of not removing lockout or tagout devices during Safety Orientation.

Authorized level employees will be trained on the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control. They will also be retrained whenever a procedure changes or a new piece of equipment is introduced. Annual training will follow customer requirements.

Retraining is required when there is a change in job assignments, in machines, a change in the energy control procedures, or a new hazard is introduced.

All training and/or retraining must be documented, signed & certified.

Mobile Equipment

Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, Managers, and employees about their responsibilities in the operations and management of Miller Pipeline mobile equipment.

Scope

The section applies to all Miller Pipeline employees and shop operations.

Definitions

Not applicable to this section

Responsibilities

Safety Director

Responsible for developing and maintaining the program and related procedures.

Foreman

Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the plan.

Employees

All shall be familiar with this procedure and the local workplace vehicle safety program. Follow all requirements, report unsafe conditions, and follow all posted requirements.

Procedures

The following requirements apply for all Miller Pipeline locations:

- Miller Pipeline must develop and implement safe work procedures for the use of powered mobile equipment in the workplace and must train workers in those safe work procedures.
- The equipment operator of mobile equipment shall be directly responsible for the safe operation of that equipment and shall comply with all laws and regulations governing the operation of the equipment.
- The records for any service, repair or modification which affects the safe performance of the equipment must be maintained and be reasonably available to the operator and maintenance personnel during work hours.
- All mobile equipment shall be maintained in safe operating condition and operation, inspection, repair, maintenance and modification shall be carried out in accordance with manufacturer's instructions or, in the absence of the instructions, in accordance with good engineering practice.

- Servicing, maintenance and repair of mobile equipment shall be done when the equipment is not in operation, except that equipment in operation may be serviced if the continued operation is essential to the process and a safe means is provided.
- Only authorized employees shall be allowed to operate mobile equipment. Authorization to operate mobile equipment will be issued to employees qualifying under appropriate training and proficiency testing. The person must also have in possession of an applicable operator's license and an airbrake certificate where required and be familiar with the operating instructions pertaining to the equipment and be authorized to operate the equipment. Authorization will be issued on after these requirements are met.
- A Manager must not knowingly operate or permit a worker to operate mobile equipment which is, or could create, an undue hazard to the health or safety of any person or is in violation of any local or federal regulations.
- Before starting the engine, the driver shall fasten seat belts (if mobile equipment contains seatbelts) and adjust them for a proper fit.
- Mobile equipment in which the operator cannot directly or by mirror or other effective device see immediately behind the machine must have an automatic audible warning device which activates whenever the equipment controls are positioned to move the equipment in reverse, and if practicable, is audible above the ambient noise level.
- Unauthorized personnel shall not be permitted to ride on equipment unless it is equipped to accommodate riders safely.
- At the beginning of each shift, the operator shall conduct a thorough visual inspection of all critical safety and operating components. These components will include but won't be limited to: the clutch, braking system, steering, lighting, and controls.
- The operator shall immediately report defects and conditions affecting or likely to affect the safe operation of the equipment to his or her immediate Manager or other authorized person and confirm this by a written report as soon as possible. If an inspection of powered mobile equipment identifies a defect or unsafe condition that is hazardous or may create a risk to the safety or health of a worker, Miller Pipeline must ensure that the powered mobile equipment is not operated until the defect is adjusted, repaired or the unsafe condition is corrected.
- The operator of mobile equipment must not leave the controls unattended unless the equipment has been secured against inadvertent movement such as by setting the parking brake, placing the transmission in the manufacturer's specified park position and by chocking wheels where necessary.
- No operator shall leave unattended a suspended load, machine or part or extension of it unless it has been immobilized and secured against inadvertent movement.
- Powered equipment shall not be left unattended unless forks, buckets, blades and similar parts are in the lowered position or solidly supported.
- Before a worker starts any powered mobile equipment, Miller Pipeline shall ensure that the worker makes a complete 360 degree visual inspection of the equipment and the surrounding area to ensure that no worker, including the operator, is endangered by the start-up of the equipment. No worker shall start any powered mobile equipment until the inspection is completed.

- All powered mobile equipment is inspected by a competent person for defects and unsafe conditions as often as is necessary to ensure that it is capable of safe operation. A written record of the inspections, repairs and maintenance carried out on the powered mobile equipment is kept at the workplace and made readily available to the operator of the equipment. As soon as is reasonably practicable the defect must be repaired or the unsafe condition is corrected.
- All mobile equipment shall be equipped with a working signal alarm for backing up that is audible above the surrounding noise level. The operator shall make sure the warning signal is operating when the equipment is backing up. If an alarm is not functional, then a “spotter” must be used whenever backing or the equipment must be tagged and removed from service.
- The operator shall use access provided and maintain three points of contact at all times to get on or off of equipment. Do not jump to the ground.
- No operator shall operate mobile equipment without the protection of an enclosed cab or approved eye protection for the type of hazards to the eye.
- Where there is a danger to the operator of a unit of powered mobile equipment or any other worker who is required or permitted to be in or on a unit of powered mobile equipment from a falling object or projectile, Miller Pipeline requires that the powered mobile equipment is equipped with a suitable and adequate cab, screen or guard.
- Each mobile equipment vehicle used for lifting must be provided with a durable and clearly legible load rating chart that is readily available to the operator. The operator shall not load the vehicle/equipment beyond its established load limit and shall not move loads which because of the length, width, or height that have not been centered and secured for safe transportation.
- Mobile equipment used for lifting or hoisting or similar operations shall have a permanently affixed notation stating the safe working load capacity of the equipment and the notation must be kept legible and clearly visible to the operator.
- Mechanical equipment used to lift or move lines or other material shall be used within its maximum load rating and other design limitations for the conditions under which the work is being performed.
- The operator shall not use, or attempt to use, any vehicle in any manner or for any purpose other than for which it is designated.
- The operator's manual for powered mobile equipment must be readily available to a worker who operates the equipment.
- Adequate and approved fire suppression equipment shall be provided on mobile equipment.
- The operator of a gasoline or diesel vehicle shall shut off the engine before filling the fuel tank and shall see that the nozzle of the filling hose makes contact with the filling neck of the tank. No one shall be on the vehicle during fueling operations except as specifically required by design. There shall be no smoking or open flames in the immediate area during fueling operation.
- When a worker is required to work beneath elevated parts of mobile equipment including trucks, the elevated parts shall be securely blocked.

- Materials and equipment being transported shall be loaded and secured in a manner to prevent movement which could create a hazard to workers or another person. This includes keeping the cab, floor and deck of mobile equipment free of material, tools or other objects which could create a tripping hazard, interfere with the operation of controls or be a hazard to the operator or other occupants in the event of an accident.
- Mechanical equipment shall be operated so that the minimum approach distances established by OSHA are maintained at all times.
- If work must be performed within a “Minimum Approach Distance” then all energized lines that are exposed to contact must be covered with insulating protective materials that will withstand the type of contact that might be made during operation.
- Each employee shall be protected from hazards that might arise from equipment contact with the energized lines. The measures used shall ensure that employees will not be exposed to hazardous differences in potential.
- When maneuvering equipment (forward or backward) in a “hazardous location” such as a substation, congested area, high traffic area, or near a powerline, the Operator must first walk the path of travel in order to identify all potential hazards. They must then assign at least one spotter *per identified hazard* and instruct those spotters on what to watch for. The Operator must also maneuver the vehicle/equipment in a slow controlled manner, maintain adequate communication with all spotters, fully obey their commands, and stop immediately if communication ceases. If the Operator fails to do any part of this, they will be held responsible for any incidents that occur.
- Spotters must discuss hand signals with Operators before spotting. While spotting they must be in full view of the Operator, make sure “Minimum Approach Distances” from overhead lines are not crossed, maintain a safe distance of 10’ from the vehicle/equipment, avoid pinch points, and walk sideways so they can scan the operating area as well as look where they are stepping. Spotters may not use cell phones, hold conversations with anyone other than their assigned Operator, or perform other tasks that may distract them from spotting.
- Situations that require the use of spotters on jobsites shall be documented on the Job Hazard Analysis form (located in the Forms Section). The situation, hazards involved, and number of spotters shall be included on the form. Anyone who does not feel comfortable with operating equipment or spotting in a hazardous situation should stop and notify their Supervisor before proceeding.
- Under no circumstance will a worker be directed, required or permitted to work under or remain in the range of a swinging load or part of unit of powered mobile equipment due to the inherent danger.

Training Requirements

All employees shall be trained, competent, and qualified persons competent in safe work procedures. Field personnel will receive daily work instructions and information from daily huddles concerning safe practices.

Pandemic Response Plan

Purpose

To establish a plan that will help the company prepare, prevent & respond to disease that may affect our employees or impact our business.

Scope

This section applies to all employees of Miller Pipeline.

Definitions

Pandemic Disease: A contagious disease or illness that spreads rapidly over a large region.

Procedures

Pandemic Disease Prevention

This pandemic disease plan was developed to determine how such a situation will be handled. The individual appointed to coordinate this, is our Safety Director. Our Safety Director will be responsible for dealing with disease issues and how it impacts the workplace. They will also be responsible for contacting the local health department and/or health care providers in advance, and developing and implementing protocols for responding to all ill employees.

Information about seasonal or other diseases that could be beneficial for employees to know about will be communicated via email, covered in monthly safety meeting agendas, and daily huddles/toolbox talks.

If an outbreak of a pandemic disease has been reported in the area, the company will intentionally limit the size and number of large meetings that are held until the disease is under control.

All employees will be encouraged to receive preventative vaccinations for seasonal flu and other seasonal illnesses as necessary. In an effort to increase the number of employees who participate in these vaccinations the company may coordinate certain days where they are offered at the office.

All facilities, desktops, workstations and other surfaces that are known to collect germs will be cleaned and disinfected, on a frequent basis in order to reduce the spread of illness.

Soap, towels & running water will be provided at all facilities and jobsites for employees to use.

All employees will be instructed to wash their hands for at least 20 seconds, on a frequent basis, and especially before eating, drinking, using tobacco products, or otherwise placing something in their mouth. The use of hand sanitizer gel will also be recommended for use, but not required.

In some cases, gloves and masks may need to be issued to workers to protect them as well. Employees shall wear nitrile gloves (when it doesn't pose a hazard to the work being performed), and especially when opening doors, pressing elevator buttons, or grabbing handrails.

Employees who become ill should stay at home until their symptoms have been absent for at least 24-hours. However, there may be more stringent guidelines for different illnesses. If ill employees can do their work from home (i.e. office or management employees) and they wish to, they may talk to their direct supervisor about doing so. If granted permission, their pay will not be affected for that time period.

Pandemic Response Procedure

Any employee who is diagnosed with a pandemic disease that could be life threatening (i.e. Tuberculosis, Smallpox, H1N1, COVID-19, etc.) must immediately isolate themselves from all other employees & notify the company's Safety Director over the phone.

Upon initial notification the Safety Director shall gather as much detail as possible from the infected employee, including when they first noticed symptoms, what those symptoms were, when they were diagnosed, who they have been in contact with since the symptoms were first noticed, and where all they have worked/visited since the onset of the illness.

After gathering this information, the Safety Director shall contact our Account Manager at our designated healthcare facility, to notify them of the situation and to request assistance from a healthcare professional who has intimate experience with that specific disease. They will then work with this professional to establish a plan specific to that disease to determine decontamination procedures & other precautions necessary for minimizing exposure.

A list will then be assembled of all employees who could have potentially been exposed to this disease. Those individuals will be immediately notified over the phone about the incident and requested to report to a specific clinic for testing (if necessary).

All other employees will then be notified about the incident (in a way that complies with employee privacy and HIPPA laws). This communication will likely start in the form of an email sent to all managers & supervisors but will then be communicated on down through the workforce verbally.

The President & COO or Safety Director will also notify the customer of the incident. Again, information will be shared but employee privacy laws will not be violated.

All tools, equipment, work areas, and other items that could have potentially been infected will then be thoroughly sanitized prior to allowing employees to use them.

If a large percentage of employees become ill and it effects the company's ability to meet customer's expectations and/or satisfy project due dates, the company may hire temporary employees to handle the workload until the ill company employees can return to work.

Following a pandemic event, the Safety Director shall review, and identify learning opportunities and take action to implement any corrective actions.

COVID-19 Policy & Procedures

Refer to our company specific documents located in the Appendix, "Miller-Covid 19 Updated Masking Policy" and "Employee Covid Messaging".

Training Requirements

All employees will be educated on illness prevention, initial disease symptoms, how to avoid spread of disease, when it is appropriate to return to work after illness, and company policies concerning illness at least annually during a weekly toolbox talk.

The "Pandemic Response Procedure" outlined in this plan should be practiced (at least by using a tabletop exercise) once a year.

Personal Protective Equipment

Purpose

The basic element of any PPE program is an in-depth evaluation of the equipment needed to protect against the hazards at the workplace; this is the initial hazard assessment for which written documentation is required. Two basic objectives of any PPE program should be to protect the wearer from incorrect use and/or malfunction of PPE. The purpose of this PPE Program is to document the hazard assessment, the protective measures in place, and the PPE in use at Miller Pipeline.

Employees are to use the personal protective equipment, protective devices, and special tools provided for their work. Before starting work, these items shall be inspected by the employee to be sure that they are in safe operating condition. Failure to use appropriate and necessary PPE is a direct violation of company policy and may result in disciplinary action.

PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing and construction practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards that cannot reasonably be abated otherwise.

Scope

This section applies to all full-time, part-time, contract & temporary employees.

Responsibilities

Safety Director

Take full responsibility for the complete implementation of this policy.

Maintains copies of this program on the Miller Hub and the Safety and Compliance Department at the company headquarters in Indianapolis, Indiana.

Assess all new job functions for the use of PPE by completing *the PPE Hazard Assessment Form* (located in the Forms Section).

SQC/Regional Technical Trainer (RTT)/Foreman

Distribute the appropriate PPE to all employees prior to beginning work.

Constantly monitor jobsites for adherence to this policy and issue disciplinary action to employees who are in violation.

Employee

Wear and maintain all required PPE.

Procedures

General Requirements

Miller Pipeline will provide and pay for all PPE that is required by this program other than general work attire (e.g. long pants, shirts, work boots, etc.). Employees may choose to provide their own PPE as long as it meets ANSI and company specifications. Miller Pipeline must assure its adequacy, including proper maintenance, and sanitation of such equipment.

Consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected.

All PPE (including employee provided equipment) shall be inspected daily for defects, replaced if found defective, stored in a way that does not promote damage, and cleaned regularly. PPE that is damaged shall not be used.

Hazard Assessment

In order to assess the need for PPE the following steps are taken:

1. The Corporate Safety Director, with other appropriate employees, identifies job classifications where exposures occur or could occur. The Safety Director or designee examines the following records to identify and rank jobs according to exposure hazards:
 - a. Injury/illness records
 - b. First aid logs
2. The Corporate Safety Director conducts a walk-through survey of workplace areas where hazards exist or may exist to identify sources of hazards to employees. These basic hazard categories are considered:
 - a. Impact
 - b. Heat
 - c. Penetration
 - d. Harmful dust
 - e. Compression (roll over)
 - f. Light (optical) radiation
 - g. Chemical

During the walk-through survey the Safety Director observes and records the following hazards along with PPE currently in use (type and purpose) on the *PPE Hazard Assessment Form* (located in the Forms Section). Completed forms will be distributed to Foremen & made available to all levels of employees.

- Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects.
- Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.
- Types of chemical exposures.
- Sources of harmful dust.
- Sources of light radiation; i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.
- Sources of falling objects or potential for dropping objects.

- Sources of sharp objects that might pierce the feet or cut the hands.
 - Sources of rolling or pinching objects that could crush the feet.
 - Layout of workplace and location of co-workers.
 - Certain electrical hazards.
1. Following the walk-through survey, the Safety Director organizes the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.
 2. An estimate of the potential for injuries is now made. Each of the basic hazards is reviewed and a determination is made as to the frequency, type, level of risk, and seriousness of potential injury from each of the hazards found. The existence of any situations where multiple exposures occur or could occur is considered.
 3. The Safety Director documents the hazard assessment using the *PPE Hazard Assessment Form* that identifies the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and that the document is a certification of hazard assessment.

Foremen will also conduct a Job Hazard Analysis prior to starting a new project, as required by our "Hazard Analysis Plan". During this process Foremen will look for unique or non-routine tasks and prescribe the proper level of PPE.

Selection Guidelines

Once any hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

1. Become familiar with the potential hazards and the type of protective equipment (PPE) that are available, and what they can do.
2. Compare types of equipment to the hazards associated with the environment.
3. Select the PPE that ensures a level of protection greater than the minimum required to protect employees from the hazards and inform employee of reasons for selection.
4. Fit the user with proper, comfortable, well-fitting protection and instruct employees on care and use of the PPE. Each affected employee will be fitted, including proper donning, doffing, cleaning, and maintenance of PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE.

It is the responsibility of the Safety Director to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and to reevaluate the suitability of previously selected PPE. This reassessment will take place as needed.

Elements that should be considered in the reassessment include:

- Adequacy of PPE program
- Accidents and illness experience
- Levels of exposure (this implies appropriate exposure monitoring)
- Adequacy of equipment selection
- Number of person hours that workers wear various protective ensembles
- Adequacy of training/fitting of PPE
- Program costs

- The adequacy of program records
- Recommendation for program improvement and modification
- Coordination with overall safety and health program

Cleaning and Maintenance

PPE must be provided, used, and maintained in a sanitary and reliable condition. It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the required protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If a piece of PPE is in need of repair or replacement it is the responsibility of the employee to bring it to the immediate attention of his or her supervisor or the Safety Manager. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Defective or damaged PPE shall not be used. Contaminated PPE that cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards. If employee owned equipment is used it must meet the same safety standards as company owned PPE.

PPE Specific Information

Eye and Face Protection

All employees are required to wear the appropriate type of ANSI approved eye/face protection whenever performing a task that could result in an eye or face injury. Anyone working in or passing through areas that pose such hazards is also required to wear appropriate eye/face protection.

Some examples of when proper eye/face protection must be worn are as follows:

- **SAFETY GLASSES:** Safety glasses are required to be worn 100% of time when on a job site, in a garage, shop area, or when working in one of the yard areas. Safety glasses must be ANSI Z87.1 approved.

Exceptions to this requirement include when working in an enclosed cab of equipment. Due to the nature of our work, there may be other times that safety glasses cannot be worn. When these circumstances arise, approval must be obtained from a Safety, Quality, and Compliance Coordinator and the reason why safety glasses cannot be worn documented on the Daily Planning Huddle. These circumstances should be extremely rare. Exceptions will be granted only when the use of safety glasses presents a greater hazard than wearing safety glasses.

- **FACE SHIELDS:** Must be worn over safety glasses when exposed to flying particles that could blow around the edges of safety glasses and get into the eyes. Some examples of tasks that would require the use of face shields include: grinding and standing above grade while blasting below grade, and operating hydro excavators or air lances.
- **GOGGLES:** Must be worn when exposed to flying particles that could blow around the edges of face shields/safety glasses and get into the eyes. Three of our most common examples of this include: working around blowing gas, working with compressed air, and removing rust from steel/iron pipe.

All eye/face protection devices shall fit properly and be maintained in a sanitary and serviceable condition. It is the responsibility of the supervisor to see that properly fitted and adjusted eyewear is provided for each individual. Eye protection is to be replaced when it becomes warped, scratched, or otherwise damaged. All employees are required to carry their safety glasses on their body at all times while present on a jobsite.

Employees requiring prescription eyewear must either wear eye protection fitted with prescription lenses or eye protection designed to be worn over regular prescription eyewear. Contact lens wearers must also wear appropriate eye protection devices in a hazardous environment. Dusty and/or chemical environments may present an additional hazard to contact lens wearers.

Head Protection – Hard Hats

As a condition of employment all employees (full time, part time, contract and temporary) who are present on one of our jobsites or performing construction activities at any location are required to wear a hard hat. This includes mechanics who are repairing equipment on jobsites, office employees who are just visiting, and all other individuals who are present as a condition of their employment.

The following situations are exceptions to our standard hard hat requirements, but only if there are no other circumstances involved that could create a potential for head injury:

- Employees may choose not to wear any form of head protection whenever they are not present on a jobsite or performing construction activities, or when they are sitting inside of a vehicle, sitting on an excavator that is equipped with a roll-over protective structure, or operating a directional drill while wearing headphones to communicate.
- Welders may choose to not wear a hard hat while present on jobsites or performing construction activities, but only when they are wearing a welding helmet. When a welding helmet is not being worn they must wear a hard hat just like everyone else.
- WEKO Seal employees must wear head protection when working inside of pipes. Bump caps do not provide adequate protection and shall not be worn on jobsites in lieu of a hardhat.
- Hard hats are only good for 5 years, and must be replaced once they have reached the end of their service life. This can be verified by checking the manufactured date stamped on the inner brim of the hardhat.
- Cutting holes into or altering of hard hats is not permitted.
- Stickers on hardhats are acceptable, permitted they are not metallic (this can affect intrinsic protection of the hard hat).

All forms of head protection must be ANSI Z89.1 approved. Headbands must be adjusted to prevent the unit from falling off. If necessary, a chinstrap will be used to keep the hard hat in place.

Head protection shall be routinely inspected for defects, such as: visible cracks, damage from contact with chemicals, or melting from exposure to heat sources. Any unit found with such a defect must be removed from service and replaced immediately. Hard hats shall also be replaced if the manufacturer only approves their use for a limited period of time (some only approve them for 5-years).

Safety Staff, Superintendents, and Foremen are all responsible for ensuring that all employees under their charge are in compliance with this policy.

Foot Protection

As a condition of employment all employees, full time, part time, contract and temporary, working in designated work areas and/or job assignments are required to wear safety shoes to help prevent foot injuries, ankle injuries, slips, and falls. Construction employees are required to wear ANSI-approved safety shoes or safety shoes that have been demonstrated to be equally effective.

Footwear shall meet the following standards:

- Made of a durable cut-resistant material (i.e. leather, Kevlar, etc.);
- Has a protective toe cover that meets or exceeds the “ANSI Z41.1” standard for impact;
- Has a mid or high cut ankle (6” or above);
- Has a rubber sole with aggressive tread to prevent slipping;
- Be “Electrical Hazard Rated” (EH rated).

Where the work environment dictates, more stringent requirements may be mandated at the discretion of the management. Such as metatarsal guards which shall be worn whenever operating a jackhammer or pneumatic tamp.

The following types of footwear are not acceptable:

- Tennis or other athletic shoes
- Canvas, cloth, or thin soled shoes
- Open-toe shoes or sandals

Safety footwear is provided by the company for all full-time employees who are required to perform work on a construction jobsite or in a shop environment as part of their job duties.

All supervisors and managers are responsible for ensuring their employees are in compliance with this policy. It is the responsibility of the contractor or temporary agency to ensure their employees report to assignments at this company wearing approved safety shoes.

New employees required to adhere to this policy must have safety-toed work boots their first day on the job. Employees that transfer into a job that requires safety-toed work boots must have the boots on the date of transfer. Miller Pipeline will provide reimbursement for boots and gloves on an annual basis for the employees described above (see the Boot and Glove Reimbursement form in the Forms Section, or on the Miller Hub for more information).

Hand Protection

As a condition of employment all employees, full time, part time, contract and temporary, working in designated work areas and/or job assignments are required to wear gloves to help prevent hand injuries, including, but not limited to, cuts, burns, and chemical exposure.

Each employee is to wear gloves as suitable for the work performed. Rubber glove protectors are not to be used as work gloves. Use appropriate hand protection when hands are exposed to hazards such as skin absorption of harmful substances; severe cuts, lacerations, abrasions, or punctures; chemical burns, thermal burns, and harmful temperature extremes. Take into consideration the task(s) to be performed, conditions present, duration of use, and hazards and potential hazards identified when determining the need for hand protection. Gloves are to be on your person at all times when on the jobsite.

All employees required to wear protective gloves must routinely inspect and properly care for their assigned gloves (if the gloves are not disposable). All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

Hearing Protection

For further detail, refer to the Miller Pipeline Hearing Conservation Program section.

Hearing protectors must be available to all workers exposed at or above the action level. Supervisors shall decide, with the help of a person who is trained in fitting protectors, which size and type is most suitable for their working environment. The protector selected shall be comfortable to wear and offer sufficient attenuation to prevent hearing loss. Employees must be shown how to use and care for their protectors, and must be supervised on the job to ensure they continue to wear them correctly.

Hearing protectors must provide adequate attenuation for each employee's work environment. The supervisor shall re-evaluate the suitability of the employee's present protector whenever there is a change in working conditions that may cause the hearing protector in use to be inadequate. If workplace noise levels increase, employees must be given adequate protectors.

Employee training is important because when workers understand the reason for the hearing conservation program's requirements and the need to protect their hearing, they will be better motivated to participate actively in the program, and to cooperate by wearing their protectors.

Clothing

All field and shop employees shall wear unaltered long pants that reach their boots, and unaltered shirts with sleeves that are approximately 4-inches in length. All shirts must be 100% cotton, denim or another flame-resistant material. Nylon, Rayon, Polyester and other materials that are likely to melt are strictly prohibited. All field employees must wear high visibility vests (class 2 or higher, per customer requirements). Loose clothing shall never be worn around rotating parts. This is especially important around directional drills and rotating tools and equipment.

When there is a potential for an uncontrolled release of gas, or when required by the customer, employees must wear flame resistant-clothing (including FR coveralls, hot mill or leather gloves, Nomex hoods, and goggles). When tasks require the use of FR clothing, the Arc/FR rating shall be appropriate for the work being performed and the hazard(s) being protected from. Some tasks that require such clothing include: tapping steel mains, retiring mains, purging mains, installing leak clamps, cutting and plugging live services.

FR coveralls must be made of a fabric that is fire-resistant, have an elastic waist, adjustable wrist/ankle cuffs, zipper appendages, and the pant legs must be able to be pull-on over boots (i.e. flared or zipper legs). Coveralls must be washed regularly, be free from rips/tears, and have the Velcro cuffs adjusted tightly when worn. Hot mill or leather gloves must have the cuffs tucked under the overall sleeves. Nomex hoods shall be worn so it covers the nose and mouth (only eyes exposed). Goggles must be worn so they overlap the Nomex hood.

Respiratory Protection

Either full-face positive-pressure supplied-air respirators or a self-contained breathing apparatus must be worn when working in atmospheres that have the potential to become oxygen deficient (i.e. oxygen level below 19.5%). Since natural gas can deplete oxygen levels, respirators may be required in lieu of goggles when working around a substantial amount of blowing gas.

Employees that are required to use respiratory protective devices shall be instructed in their use.

Respiratory protective equipment shall be inspected regularly and maintained in good condition.

For further detail, refer to the Miller Pipeline Respiratory Program section.

Fall Protection

OSHA requires personal fall arrest devices to be worn whenever working at heights of six (6) feet or more. However, some clients may require fall protection when working at heights greater than 4 feet, so we must comply. In our industry, some common tasks that often require the use of fall arrest devices include: being lowered into a manhole, operating an aerial lift, and working on scaffolding. For more information on these requirements, reference our Fall Protection Plan. Guardrails may be needed for walkways across excavations. For more information on these requirements, reference our Trench & Excavation section.

Training Requirements

Each employee who is required to use personal protective equipment will receive training during the New Employee Orientation process and as needed thereafter. Training includes:

- When PPE is necessary
- What PPE is necessary
- How to wear assigned PPE, including how to don, doff, and adjust
- Limitations of PPE
- The proper care, maintenance, useful life, and disposal of assigned PPE

Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment. Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.

If the company has reason to believe an employee does not have the understanding or the skill required, the employee must be retrained. Circumstances where retraining may be required include changes in the workplace or changes in the types of PPE to be used which would render previous training obsolete. Also, inadequacies in an affected employee's knowledge or use of the assigned PPE, which indicates that the employee has not retained the necessary understanding or skills, would require retraining.

All training on PPE will be documented. This documentation shall include the employee's name, dates of training, and the certification subject.

Process Safety Management

Purpose

This section contains requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. These releases may result in toxic, fire or explosion hazards.

Scope

This policy applies to employees performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process.

Definitions

Atmospheric tank - a storage tank which has been designed to operate at pressures from atmospheric through 0.5 p.s.i.g. (pounds per square inch gauge, 3.45 Kpa).

Boiling point - the boiling point of a liquid at a pressure of 14.7 pounds per square inch absolute (p.s.i.a.) (760 mm). For the purposes of this section, where an accurate boiling point is unavailable for the material in question, or for mixtures which do not have a constant boiling point, the 10 percent point of a distillation performed in accordance with the Standard Method of Test for Distillation of Petroleum Products, ASTM D-86-62, which is incorporated by reference as specified in Sec. 1910.6, may be used as the boiling point of the liquid.

Catastrophic release - a major uncontrolled emission, fire, or explosion, involving one or more highly hazardous chemicals, that presents serious danger to employees in the workplace.

Facility - the buildings, containers or equipment which contain a process.

Highly hazardous chemical - a substance possessing toxic, reactive, flammable, or explosive properties and specified by paragraph (a)(1) of this section.

Hot work - work involving electric or gas welding, cutting, brazing, or similar flame or spark-producing operations.

Normally unoccupied remote facility - a facility which is operated, maintained or serviced by employees who visit the facility only periodically to check its operation and to perform necessary operating or maintenance tasks. No employees are permanently stationed at the facility. Facilities meeting this definition are not contiguous with, and must be geographically remote from all other buildings, processes or persons.

Process - any activity involving a highly hazardous chemical including any use, storage, manufacturing, handling, or the on-site movement of such chemicals, or combination of these activities. For purposes of this definition, any group of vessels which are interconnected and separate vessels which are located such that a highly hazardous chemical could be involved in a potential release shall be considered a single process.

Replacement in kind - a replacement which satisfies the design specification.

Trade secret - any confidential formula, pattern, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it. Appendix D contained in 1910.1200 sets out the criteria to be used in evaluating trade secrets.

Responsibilities

Owners shall inform Miller Pipeline employees of the known potential fire, explosion, or toxic release hazards related to the work and the process.

Owners shall explain to Miller Pipeline employees the applicable provisions of the emergency action plan.

The Owner shall develop and implement safe work practices to control the entrance, presence and exit of contract employers and contract employees in covered process areas.

Miller Pipeline shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.

Miller Pipeline shall assure that on all jobsites there will be an updated list and binder for all hazardous materials onsite.

Miller Pipeline shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.

Miller Pipeline shall document that each contract employee has received and understood the training required by this paragraph. The contract employer shall prepare a record which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.

Miller Pipeline shall assure that each contract employee follows the safety rules of the facility including the safe work practices.

Miller Pipeline shall advise the employer of any unique hazards presented by their work, or of any hazards found by their work.

Employees must report any incidents immediately.

Procedures

Pre-startup safety review

Owner shall perform a pre-startup safety review for new facilities and for modified facilities when the modification is significant enough to require a change in the process safety information.

The pre-startup safety review shall confirm that prior to the introduction of highly hazardous chemicals to a process:

Construction and equipment is in accordance with design specifications;

Safety, operating, maintenance, and emergency procedures are in place and are adequate;

For new facilities, a process hazard analysis has been performed and recommendations have been resolved or implemented before startup; and modified facilities meet the requirements contained in management of change.

Training of each employee involved in operating a process has been completed.

The owner shall establish and implement written procedures to maintain the on-going integrity of process equipment.

Inspections and tests shall be performed on process equipment.

The owner shall correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation.

In the construction of new plants and equipment, the owner shall assure that equipment as it is fabricated is suitable for the process application for which they will be used.

The owner shall issue a hot work permit for hot work operations conducted on or near a covered process.

The owner shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to facilities that affect a covered process.

Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-up of the process or affected part of the process.

The owner shall investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release of highly hazardous chemical in the workplace. An incident investigation must be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained for 5 years.

The owner shall establish and implement an emergency action plan for the entire plant in accordance with the provisions of 29 CFR 1910.38(a). In addition, the emergency action plan shall include procedures for handling small releases. Owners covered under this standard may also be subject to the hazardous waste and emergency response provisions contained in 29 CFR 1910.120(a), (p) and (q).

Owners shall certify that they have evaluated compliance with the provisions of this section at least every three years to verify that the procedures and practices developed under the standard are adequate and are being followed.

Owners shall make all information necessary to comply with the section available to those persons responsible for compiling the process safety information, those assisting in the development of the process hazard analysis, those responsible for developing the operating procedures, and those involved in incident investigations, emergency planning and response and compliance audits without regard to possible trade secret status of such information.

All contract employers must respect the confidentiality of trade secret information when the process safety information is released to them.

Training Requirements

Miller Pipeline shall train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner.

Respiratory Protection

Purpose

Identify and control potential harmful exposures to dusts, fumes, mists, gases, smokes, sprays or vapors, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline. that are exposed to potential hazards generating from air contaminants. This policy does not include those employees whose only use of respirators involves the voluntary use of filtering facepieces (dust masks).

Definitions

Qualitative Fit Test: A pass/fail fit test used to assess the adequacy of the respirator by introducing a test agent to the individual when wearing the respirator and observing their reaction.

Quantitative Fit Test: An assessment of the adequacy of a respirator fit using a specific machine to numerically measure the amount of leakage into the respirator.

PLHCP: Physician or other Licensed Health Care Professional.

IDLH: Immediate Danger to Life or Health.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Coordinates medical activities between Designated healthcare facility and the employee.

Process all paperwork between Miller Pipeline, the employee and Designated healthcare facility necessary to evaluate an employee for the use of a respirator, including the *Respirator Medical Questionnaire* and *Respirator Information for the Physician* forms (both located in the Forms section).

Fit test all employees who are required to wear a tight-fitting respirator and documents the results by completing the *Respirator Fit Test Form* (located in the Forms section).

Distributes the proper respiratory protection, free of charge, to affected employees prior to beginning work.

Foreman

Enforces the guidelines addressed in this policy.

Procedures

Designation of Responsibility

The Safety Director is responsible for overseeing the complete implementation of this policy by working with all levels of employees, Designated healthcare facility and possibly a certified competent

person who will conduct all monitoring activities. This person must be knowledgeable of the complexity of the program, able to conduct evaluations and have the proper training.

Hazard Identification

All operations performed by Miller Pipeline that involve a possible overexposure to hazardous airborne substances will be analyzed to determine if the use of respiratory protection is required on a mandatory basis. This may be accomplished by either reviewing the company's operations, processes and procedures, by conducting industrial hygiene monitoring, or by a competent person analyzing the information contained on a Safety Data Sheet (SDS).

This program is to be followed when engineering control measures are not feasible or during emergency situations with high exposure to harmful vapors and oxygen deficient atmospheres. Respirators shall be provided which are applicable and suitable for purpose intended.

As all other sections in this Health & Safety Program, this policy will be evaluated on an annual basis by the Safety Director. All monitoring results, employee complaints, recordable and near-miss injuries, as well as Incident Investigation and *Safety Inspection Reports* will be taken into consideration when conducting this evaluation.

The Safety Director must address appropriate surveillance, and ensure employees leave the area to wash, change cartridges, or if they detect break-through or resistance.

General Safe Work Practices

NIOSH approved tight fitting respirators will be worn by employees who perform work or work around other contractors who perform work that involves inadequate levels of oxygen or the potential overexposure to hazardous dusts, fogs, mists, gases, smokes, sprays, or vapors.

Medical evaluations must be performed before an employee is permitted to wear any type of respirator. These medical evaluations will be performed by a physician or licensed health care professional and provided at no cost. Follow-up medical evaluations shall be conducted as required by the physician and whenever conditions change (e.g. new type of respirator, employee develops asthma, significant weight loss or dental work for the respirator user, etc.).

Employees must leave the respirator use area if they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the facepiece.

Disposable dust masks will be available on a voluntary basis for employees who work in areas that contain nuisance dusts. All employees will be given a copy of 29 CFR 1910.134 Appendix D during Safety Orientation.

Coordination of Medical Evaluations

Upon scheduling a medical evaluation, the Safety Director will complete the *Respirator Information for the Physician* form (located in the Forms Section) and forward it to the physician's office before the employee is evaluated.

The Safety Director will then give the *Respirator Medical Questionnaire* (located in the Forms Section) to the employee, and instruct them to complete it confidentially, prior to the examination, and to give it to the physician once they arrive for their medical evaluations (the company will not receive a copy).

A copy of the physician's examination and their medical determination of the employee's ability to wear a respirator will be obtained by the Safety Director once the appointment is concluded. These documents will be placed in the employee's personnel file and not shared with anyone other than the employee, the government, company executives, and those otherwise authorized by the employee.

Medical evaluations must be confidential, during normal working hours, convenient, understandable, and the employee shall be given a chance to discuss results with physician or other licensed health care professional (PLHCP).

Types of Respiratory Protection

Air Purifying Respirators

Air purifying respirators only "purify" contaminants from the ambient air. They add NO oxygen. Because of this, air purifying respirators can only be used when the identity and concentration of the contaminant is known, the oxygen content in the air is at least 19.5%, there is periodic monitoring of the work area, the respirator assembly is approved for protection against the specific contaminant and concentration level, and the type of respirator has been fit-tested on the employee.

Filtering Facepiece (Dust Mask)

NIOSH approved disposable dust respirators provide protection against nuisance dusts and fumes. Make sure to obtain and maintain a good seal for it is difficult to fit test.

Full-Mask Respirators

This form of respirator protects the entire face and gives much more overall protection than the Half-Mask Respirator. The full-faced mask also uses cartridges or canisters that filter out hazardous contaminants from the air. These respirators only purify the air, they do not provide a source of breathing air. Therefore, they are not to be used in an oxygen deficient atmosphere without using supplied air. Filters are available for the same materials as for the half-mask, with several additional ones available.

Half-Mask Respirators

Cartridges are used to filter the air and then discarded when the End of Service Life Indicator indicates that they are no longer offering adequate protection. The half-mask respirator has approved cartridges for pesticides, organic vapors, dusts, mists, fumes, acid gases, ammonia, and several combinations.

Powered Air Purifying Respirators

The respirators have a power unit (batter operated) to filter and force air into the mask to create positive pressure. They are used with half and full-face masks, and special helmets. They are not to be used in an oxygen deficient atmosphere.

Supplied Air Respirators

Supplied Air Respirators are atmosphere supplying respirators which the source of breathing air is either a suitable air compressor or air cylinders connected to the respirator by an airline. Self-Contained Breathing Apparatus are a type of supplied air respirators which are designed for the user to carry the source of breathing air. These types of respirators should be used in any atmosphere that is classified as being IDLH.

Selecting Proper Respiratory Protection

The selection of proper respiratory protection for each individual job will be made only by a competent person who has been trained on the specific hazards involved and the requirements of the standard. This person must consider each of the following prior to making the selection:

Identity of the substance(s) present in the work environment
 The physical state of the contaminant
 The PEL and toxicity of the substance
 Exposure measurements showing the concentration likely to be encountered
 The protection factor listed for the respirator
 The possibility of an oxygen deficient atmosphere
 Any limitations or restriction applicable to the types of respirators being considered

Selection of respirators will be made in accordance with the following table:

HAZARD	RESPIRATOR
<i>Oxygen Deficiency</i>	Normal Use: SCBA, hose mask with blower, air-line respirator with auxiliary self-contained air supply, or air storage receiver with alarm
<i>Gas and Vapor Contaminants - IDLH</i>	Normal Use: SCBA, hose mask with blower, air-line respirator with auxiliary self-contained air supply, air storage receiver with alarm, air purifying, or full mask with chemical cartridge (gas mask)- Escape Only: Self rescue or mouthpiece respirator
<i>Gas and Vapor Contaminants – Not IDLH</i>	Normal Use: SCBA, hose mask with blower, air purifying, or full mask with chemical cartridge (gas mask)
<i>Particulate Contaminants - IDLH</i>	Normal Use: SCBA, hose mask with blower, air-line respirator with auxiliary self-contained air supply, air storage receiver with alarm, air purifying, or full mask with appropriate filter Escape Only: Self rescue or mouthpiece respirator
<i>Particulate Contaminants – Not IDLH</i>	Normal Use: Hose mask without blower, airline respirator, air purifying, half mask or mouthpiece respirator with filter pad or cartridge, or airline abrasive blasting respirator
<i>Combination of Gas/Vapor and Particulate Contaminants - IDLH</i>	Normal Use: SCBA, hose mask with blower, air-line respirator with auxiliary self-contained air supply, air storage receiver with alarm, air purifying, or full mask with appropriate filter, air purifying, or full facepiece with chemical canister and appropriate filter Escape Only: Self rescue or mouthpiece respirator
<i>Combination of Gas/Vapor and Particulate Contaminants – Not IDLH</i>	Normal Use: Hose mask without blower, airline respirator, air purifying, half mask or mouthpiece respirator with chemical cartridge and appropriate filter

Fit Testing Procedures

Employees will be fit tested before they are allowed to wear a respirator. These tests will be conducted with the same brand, model, and size of respirator they will be required to use.

Qualitative fit testing will be performed by Designated healthcare facility when employees are required to wear an atmosphere-supplying or negative air purifying respirator. All documentation from these fit tests will be obtained from the clinic and maintained on file.

Quantitative fit testing will be performed by the Safety Director for all other types of respirators. These fit tests will be documented by completing the *Respirator Fit Test Form* (located in the Forms Section).

Re-testing will be conducted on an annual basis or when an affected employee's physical conditions change in a way that might affect the fit of the respirator.

Maintenance and Care

Inspection and Repair

Respirators will be inspected by the employee for defects before and after each use and during cleaning procedures. Respirators used for emergency only shall be inspected monthly, and before and after each use. Respirators used only for escape purposes shall be inspected before being carried into workplace. Respirator inspection shall include:

- The inside sealing surface for cracks or distortions
- The valves for severe distortion which would cause an inadequate seal
- The headbands for severely over-stretching or other damage that could affect the fit
- The secure status of the filter element
- The status of the End of Service Life Indicator

If defects are noted during inspection, then the employee shall remove the equipment from service and inform the Foreman. The employee shall use another respirator until all necessary repairs have been made. Parts that are worn or damaged beyond repair will be discarded and replaced with new ones.

The program administrator must address appropriate surveillance, and ensure employees leave the area to wash, change cartridges, or if they detect break-through or resistance.

Cleaning and Disinfecting

Routinely used respirators shall be cleaned and disinfected as frequently as necessary to ensure the respirator is clean and in good operating condition. All used respirators will be cleaned at least once a month.

Cleaning will be performed by first completely disassembling all elements of the respirator (except the filtering elements) and submerging them in a tub of hot soapy water. They should be scrubbed until all dirt and contaminants are completely removed. The employee will then thoroughly dry off the equipment and reassemble it.

Storage

Respirators shall be stored to protect against dust, sunlight, heat, extreme cold, excessive moisture, or damaging chemicals. Large plastic bags will be kept in all job boxes to use for storing respiratory protection.

Respirators will be stored so that the facepiece and exhalation valves rest in a normal position. A respirator will not be hung by its straps.

Respirators placed in work areas for emergency use should be quickly accessible at all times and stored in compartments built for that purpose. The compartments should be clearly marked.

Procedures for Proper Use

To allow a respirator to offer complete protection against airborne contaminants or other atmospheric hazards, employees shall follow the following guidelines:

- Remain clean shaven at all times
- Put on the respirator as shown during training
- Adjust the straps to fit tightly
- Report any weight loss or gain of more than 10 pounds to the Safety Director
- Never enter an area to perform work without knowing the existing hazards prior to entry

Anything that can affect the seal must be prohibited and include facial hair, glasses, etc. Respirators with tight-fitting facepieces shall not be worn by employees who have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function.

When SCBAs, hose masks with blowers or airline respirators are used in IDLH atmospheres, attendants must be present with suitable rescue equipment.

Persons using airline respirators in IDLH atmospheres shall be equipped with safety harnesses and lifelines for lifting or removing persons from hazardous atmospheres. When working in IDLH atmospheres, the following needs to be considered: outside standby persons, maintaining communication, proper training and equipment, notification procedures, and necessary action. Mandatory equipment must include SCBA or SAR with auxiliary air supply & appropriate retrieval equipment or equivalent rescue means.

Each of the following tests shall be performed before using a respirator to ensure that it is performing adequately:

Positive Pressure Fit Check

- Place palms over exhalation valve cover and gently exhale.
- If face piece slightly bulges and air leakage is not detected, then mask fits properly.
- If leakage is detected, then reposition the respirator and tighten straps and repeat.
- If proper fit cannot be achieved, do not enter a contaminated area!

Negative Pressure Fit Check

- Place palms over open area of cartridge and gently inhale.
- Hold breath for 5-10 seconds.
- If face piece collapses slightly, then mask fits properly.
- If leakage is detected, then reposition the respirator and tighten straps and repeat.
- If proper fit cannot be achieved, do not enter a contaminated area!

Training Requirements

All affected employees will be trained annually on knowledge of respirators, fit, use, limitations, emergency situations, wearing, fit checks, maintenance & storage, medical signs & symptoms of effective use, and general requirements of the OSHA standard. The training must be completed before requiring the employee to use the respirator.

Silica Exposure Control Plan

Purpose

Identify and control potential hazards associated with exposure to silica, comply with Federal OSHA regulations, and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline.

Definitions

Action Level – The exposure amount that requires action to be taken by the company. When considering silica, the AL is 25 micrograms per cubic meter, averaged over an 8-hour period.

Assigned Protection Factor (APF) – The level of protection that a respirator is expected to provide.

Permissible Exposure Limit (PEL) – The maximum amount that an employee is allowed to be exposed to. When considering silica, the PEL is 50 micrograms per cubic meter, averaged over an 8-hour period.

Competent Person - One who is capable of identifying existing and predictable silica hazards and who has authorization to take prompt corrective action to eliminate them.

Silica – A natural crystal-like mineral that is commonly found in sand, rock, granite, clay, porcelain, coal, concrete, asphalt, brick, and even some roofing materials, abrasives, and paints.

Responsibilities

Safety Director

Acts as the “Competent Person” who oversees the full implementation of this program. This will be done by ensuring that all required equipment and PPE is provided, exposure assessments are conducted, training is performed, medical surveillance is administered, records are maintained, the program is reviewed, and jobsites are inspected frequently.

Foreman

Obtains a copy of the Exposure Control Plan (ECP), and makes it available at the worksite.

Conducts a walk-around inspection of each jobsite before work begins in order to identify potential tasks that could involve exposure to respirable silica.

Provides adequate instruction to workers on the hazards of working with silica-containing materials and on the necessary precautions.

Ensure that workers have properly selected and are properly using/maintaining necessary respiratory protection.

Employee

Know the hazards of silica dust exposure and the company tasks that involve potential exposure.

Adhere to all required Control Measures prescribed by this program, as well as all other precautions.

Report any unsafe condition, act, or incident to the foreman.

Procedures

Hazard Identification

Crystalline silica (a form of silicon) is the second most abundant material on earth. It is commonly found in stone, brick, concrete, asphalt, sand, glass, quartz, porcelain, and fiber optic cable. The silica found in these products can become airborne whenever the products are broken, cut, crushed, grinded, drilled, or otherwise disturbed.

The inhalation of airborne respirable silica has been shown to cause lung cancer, silicosis, pulmonary tuberculosis and other airway diseases. These illnesses are caused because silica often scars the lungs when inhaled, which restricts their ability to extract oxygen from the air. This damage is permanent and often continues to progress until the lungs fail. These symptoms may not appear for many years after exposure.

Company Exposures

The tasks our employees perform that could involve exposure to airborne silica are identified in the table below (Table A), as well as control measures required by our company to safely limit exposure.

Please note that all tools must be operated and maintained in accordance with the manufacturer's instructions to minimize dust emissions. Dust collection units must also provide the airflow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency, as well as a filter-cleaning mechanism.

TABLE A

EQUIPMENT	CONTROL MEASURE
Handheld Power Saws	<p><u>OUTDOORS</u></p> <ul style="list-style-type: none"> • Maintain continuous water feed on blade. • Limit exposure time to < 4 hours per person. <p><u>INDOORS</u></p> <ul style="list-style-type: none"> • Wear a respirator with an APF of 10 or more.
Walk-Behind Saws	<p><u>OUTDOORS</u></p> <ul style="list-style-type: none"> • Maintain continuous water feed on blade. <p><u>INDOORS</u></p> <ul style="list-style-type: none"> • Wear a respirator with an APF of 10 or more.
Handheld or Stand-Mounted Drills	<ul style="list-style-type: none"> • Utilize a shroud & dust collection system.
Jackhammers & Power Chippers	<p><u>OUTDOORS</u></p> <ul style="list-style-type: none"> • Maintain continuous water feed on point of impact, or utilize a shroud & dust collection system. • Limit exposure time to < 4 hours per person. <p><u>INDOORS or ENCLOSED AREA</u></p> <ul style="list-style-type: none"> • Wear a respirator with an APF of 10 or more.
Handheld Grinders (for Other)	<ul style="list-style-type: none"> • Utilize a shroud & dust collection system, or maintain continuous water feed on blade.

Company Exposures (*continued...*)

TABLE A

EQUIPMENT	CONTROL MEASURE
Heavy Equipment (for Demolition)	<ul style="list-style-type: none"> • The Operator remains within an enclosed cab. • Water is used to suppress dust if others are involved with the task & in the work area.
Heavy Equipment (for Grading & Excavating)	<ul style="list-style-type: none"> • The Operator remains within an enclosed cab. • Water is used to suppress dust if others are involved with the task & in the work area.

Control Measures

In addition to requiring the control measures listed in Table A of this policy, the company will continue exploring other ways to perform the work that may involve less exposure to silica (i.e. using products that contain less silica, using work methods that would eliminate the need to disturb the silica, etc.). Eliminating the hazard will continue to be our top priority, with the use of administrative controls and then PPE following in order.

Prior to starting a new task that involves potential exposure to airborne silica, our Foremen shall make sure that warning signs are posted in and around the work areas. Barricade tape shall be installed around the work area if a task is performed that requires our employees to wear respirators or utilize job rotation.

If another company is performing work that could generate airborne silica and our employees are nearby, then our employees must leave the immediate area until their work is complete.

Housekeeping & Sanitation

Water or vacuums shall be used whenever feasible to clean dust that is likely to contain silica. Dry sweeping/brushing a small amount of silica dust (especially when outdoors) may be performed if water or vacuums are not available for use. Using compressed air to clean silica dust is strictly prohibited.

The consumption or open storage of food, drink and/or tobacco products in environments where silica dust could be present is prohibited.

Employees shall wash their hands after working in an area where silica dust could be present and before consuming food/drink or using tobacco products.

Employees are encouraged to use vacuums to remove silica dust from their clothing before exiting the jobsite and entering into a vehicle.

Exposure Monitoring

Atmospheric monitoring will be conducted whenever a task is performed that could possibly exceed the "Action Level" of silica and is not listed in Table A of this policy. Atmospheric monitoring will also be conducted if all of the Control Measures listed in Table A cannot be implemented for a given task.

If atmospheric monitoring is necessary, then all employees who perform that task will be required to wear a respirator with an "Assigned Protection Factor" (APF) of 10 or more until the monitoring is conducted and the results are confirmed. These employees will also be required to practice all other precautions listed in this program (i.e. barricading, housekeeping, sanitation, etc.)

Any task that is monitored and confirmed to exceed the “Permissible Exposure Limit” of silica will require the use of a respirator with an APF of 10 or more whenever performing that task. These tasks will also require follow-up atmospheric monitoring at least once every 3-months.

Tasks that are monitored and confirmed to exceed the “Action Level” but not the “Permissible Exposure Limit” may be performed without wearing a respirator or following the other requirements listed in this program. However, these tasks will require follow-up atmospheric monitoring at least once every 6-months.

Tasks that are monitored and confirmed to be below the “Action Level” twice within a 7-day to 6-month window will not fall within the parameters of this policy and will not require any further monitoring.

All atmospheric monitoring must be conducted by an individual who is competent and experienced with conducting such monitoring. All monitoring data must be analyzed by a laboratory that meets the qualification and use methods identified in Appendix A of OSHA’s Silica standard.

Respirators

All employees who are required by this policy to wear respiratory protection shall be medically evaluated, fit tested and trained as required by our Respiratory Protection Program. They must also follow all other requirements listed within that program regarding the proper selection, use, maintenance, and storage of respirators.

While respirators with an APF of 10 or more provide adequate protection against silica exposure in most cases, additional protection may be required depending on atmospheric testing results.

Only NIOSH approved respirators that meet the criteria set forth within this policy will be permitted for use when performing affected tasks.

Medical Surveillance

All company employees who perform tasks that have been monitored and confirmed to involve exposure at or above the “Action Level” will be entered into a medical surveillance program if they perform those tasks for a period of thirty (30) days or more per year.

This medical surveillance program will consist of a chest x-ray and lung function test. These tests shall be conducted within 30-days of being assigned to perform affected tasks, and at least once every three (3) years thereafter.

The licensed physician performing these tests must issue a written opinion at the conclusion of their exam that identifies the date of the exam, a statement that the exam met the requirements of the OSHA standard, and any recommended limitations on the employee’s use of a respirator.

Program Implementation & Maintenance

Miller Pipeline’s Safety Director will serve the role of the “Competent Person” who is responsible for the full implementation of this program. They will oversee all activities required by this program (even if they don’t perform them directly) and conduct frequent site inspections to monitor adherence to this policy.

All monitoring results, exposure incidents, and medical examinations associated with this policy will be maintained for the employee’s length of employment plus thirty (30) years.

A formal review of this policy will be conducted annually.

Training Requirements

During Safety Orientation all employees will be trained and educated on the hazards of silica, tasks that may involve exposure, Control Measures required to limit exposure, a description of our medical surveillance program, the identity of the Competent Person named in this plan, and how to obtain a copy of this plan. Refresher training will be conducted annually.

Affected employees will also be trained in the proper selection, use, storage, and maintenance of respirators as required in the Respiratory Protection Program. All training will be documented and maintained in each employee's personnel file for the length of their employment.

Stairways & Ladders

Purpose

Identify and control potential hazards associated with stairways and ladders, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline.

Definitions

Cleat - A ladder crosspiece of rectangular cross section placed on edge upon which a person may step while ascending or descending a ladder.

Double-Cleat Ladder - A ladder similar in construction to a single-cleat ladder, but with a center rail to allow simultaneous two-way traffic for employees ascending or descending.

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.

Portable Ladder - A ladder that can be readily moved or carried.

Spiral Stairway - A series of steps attached to a vertical pole and progressing upward in a winding fashion within a cylindrical space.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman & SQC's

Enforces the guidelines addressed in this policy.

Conducts all required inspections of stairways and ladders as required by this policy.

Procedures

General Requirements

Employees will do everything possible to ensure that they do not accidentally fall from a ladder. Some common work rules that Miller Pipeline employees will be educated and reminded to practice will include the following:

Employees will always visually inspect a ladder for defects prior to use. These defects will include cracks, decaying, missing parts (e.g. rubber feet), and grease or oil. They will immediately report any noted defects to their Superintendent, or place a tag on it to indicate the deficiency to others.

They will always use both hands when ascending or descending a ladder, and face the ladder. Employees will never attempt to carry tools or other objects while using ladders. All tools or equipment will be hauled up or down by the use of a hand line or attached to a worker's tool-belt.

Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use.

Ladders placed in passageways, doorways, or driveways will be completely secured, or the area will be barricaded, an employee will be designated as a hazard watch, or warning signs will be posted in conspicuous locations.

When transporting, ladders will be carried in the horizontal position to avoid contact with overhead electrical conductors.

Whenever an employee will work at an elevated level, they will use a ladder of a length that permits them to work comfortably without overextending or standing on the top step.

Ladders shall be used only for the purpose for which they were designed. Never use a ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.

Any ladder used by a Miller Pipeline employee will be free from any physical defects that may cause an injury to an employee.

A stairway or ladder will be provided at all personnel points of access when there is a break in elevation of 19" or more to gain access to different levels of the building structure, and no ramp, runway, sloped embankment, or personnel hoist is provided.

Ladder side rails will extend 3 feet above the landing surface to which the ladder is used to gain access. When such an extension is not possible, the ladder will be secured from movement at the top to a rigid support that will not deflect. A grasping device, such as a grab-rail, will be provided to assist employees in mounting and dismounting the ladder.

Straight ladders will be equipped with cleats or grippers. When in use, the ladder will be secured at the top and bottom whenever possible. They will be placed at the proper angle. The distance from the wall to the base of the ladder will be one fourth of the working length of the ladder.

Employees will remain aware of and comply with all limitations of ladders. These limitations include not exceeding the maximum rated load capacity, limiting the number of occupants on the ladder at one time, never using a ladder in a way to reduce stability (i.e. standing on the top step), and using the right type of ladder that will provide necessary protection (i.e. non-metallic ladders in electrical locations).

Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use. Rungs, cleats, and steps of portable ladders (except as provided below) and fixed ladders (including individual-rung/step ladders) shall be spaced not less than 10 inches (25 cm) apart, no more than 14 inches (36 cm) apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of step stools shall be not less than 8 inches (20 cm) apart, nor more than 12 inches (31 cm) apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of the base section of extension trestle ladders shall not be less than 8 inches (20 cm) nor more than 18 inches (46 cm) apart, as measured between center lines of the rungs, cleats, and steps. The rung spacing on the extension section of the extension trestle ladder shall be not less than 6 inches (15 cm) nor more than 12 inches (31 cm), as measured between center lines of the rungs, cleats, and steps. The minimum clear distance between the sides of individual-rung/step ladders and the minimum clear distance between the side rails of other fixed ladders shall

be 16 inches (41 cm). The minimum clear distance between side rails for all portable ladders shall be 11 1/2 inches (29 cm). The rungs of individual-rung/step ladders shall be shaped such that employees' feet cannot slide off the end of the rungs. The rungs and steps of portable metal ladders shall be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.

Proper Selection

Foremen will ensure that the ladders that are selected to be used during a job are properly rated to withstand the load capacity. The following describes the different types of ladders and their ratings:

Type IA – A ladder made for extra heavy-duty professional use rated for up to 300 lbs.

Type I – A ladder made for heavy-duty industrial use rated for up to 250 lbs.

Type II – A ladder made for medium duty commercial use rated for up to 225 lbs.

Type III – A ladder made for light duty household use rated for up to 200 lbs.

A double-cleated ladder will be used when a ladder is the only means of access or egress from a working area for 25 or more employees, or when the ladder is to serve simultaneous two-way traffic.

Metal ladders will not be used in areas where contact with electrical parts is possible.

Ladder Inspections

The Superintendent will visually inspect the ladders for defects or improper usage. Inspections conducted should review the following:

- No cracked or missing cleats
- No cracked side rails
- No broken or missing rungs/steps
- No corroded or defective components
- No decaying and rotted wood
- Proper installation of rubber feet
- Not painted to hide defects
- Not spliced together to extend length
- No more than one employee at a time on a ladder
- Used as the manufacturer recommends
- Not moved shifted or extended while in use
- Secured when accessing a landing
- Extended 3 feet above landings

If a ladder does not pass inspection, it will be removed until the necessary repairs can be made. If for some reason the ladder cannot be removed, it will be tagged out of service until the necessary repairs can be made.

General Requirements for Stairways

All steps of stairways will be level, without cracks or defects and uniform in height. A landing of 20 inches of clear space beyond the swinging radius of the door will be placed directly outside of doorways to job site trailers before the first step of a stairway begins. All stairways will be at least 22 inches wide.

Stairways consisting of more than 3 stairs will be equipped with a guardrail system on all open sides. This guardrail system will consist of a top-rail 42 inches from the walking surface and a mid-rail 21 inches from the walking surface.

Spiral stairways are not permitted on construction sites, unless they are to be a permanent part of the building structure.

Training Requirements

All employees who are expected to use ladders while performing their work will be trained in the nature of fall hazards, how to select the proper type/construction of ladder for each job, how to inspect ladders for defects, common precautions for using ladders, the importance of not exceeding rated load capacities, and other requirements stated in this policy during Safety Orientation.

Stop Work Authority

Purpose

The purpose of this procedure is to establish a uniform method for stopping work. The Stop Work Authority (SWA) establishes the responsibility and authority of any individual to stop work when an unsafe condition or act could result in an undesirable event.

Scope

This policy applies to all Miller Pipeline employees.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Instructs employees of the (SWA) Stop Work Authority process which involves a stop, notify, correct, and resume approach for the resolution.

Foreman

Enforces the guidelines addressed in this policy.

Creates a culture where Stop Work Authority is exercised freely.

Employee

All employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of HSE risk exist

Responsible to initiate a Stop Work Intervention when warranted

Procedures

Situations that initiate the use of Stop Work Authority:

- Unsafe conditions
- Incident occurs
- Significant near loss
- Emergency situation
- Alarm sounds
- Change in conditions
- Change in scope of work
- Change in work plan
- Anytime that anyone feels that personnel, the environment, or equipment is at risk

No work will resume until all stop work issues and concerns have been adequately addressed.

Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated.

When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, 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

All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.

Stop Work reports shall be reviewed by a supervisor or manager in order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learnings.

It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) 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

Training Requirements

All employees will receive Stop Work Authority training before initial assignment. The training must be documented including the employee's name, the dates of training, and the subject.

Traffic Zone Safety

Purpose

Identify, control, and provide an overview of potential hazards associated with highway and road construction, as defined by the Federal Highway Administration, Manual for Uniform Traffic Control Devices (MUTCD), Chapter 6, 2009 Edition and Federal OSHA Standards, Subpart G – Signs, Signals, and Barricades.

Scope

This program applies to all employees of Miller Pipeline and will be made available to all company employees 24-hours a day by keeping a *readily assessable* copy on our company website as well as on each company jobsite.

Definitions

Incident Zone: An area of a highway where temporary traffic controls are imposed by authorized officials in response to a traffic incident.

Planned Special Event: A planned special event often creates the need to establish altered traffic patterns to handle the increased traffic volumes generated by the event.

Temporary Traffic Control (TTC) Plans: A plan that describes temporary traffic control measures to be used for facilitating road users through a work zone, or an incident area. A TTC plan plays a vital role in providing continuity of effective road user flow when a work zone, incident, or other event temporarily disrupts normal road user flow.

Temporary Traffic Control Zones: Areas of a highway where road conditions are changed because of a work zone, an incident zone, or a planned special event through the use of TTC devices, uniformed law enforcement officers, or other authorized personnel.

Work Zone: An area of a highway with construction, maintenance, or utility work activities.

Procedures

Temporary Traffic Control Plans

Any time work is to be done along or on an active roadway an “External Traffic Control Plan” must be written. These plans usually focus on public safety and are generated, issued & controlled by a local municipality or government agency. However, by law contractors have the right to review these plans & make suggestions for modifications.

Internal Traffic Control Plans are optional and are developed by contractors. These plans usually focus on employee safety. Some points that could be included in these plans include:

- Traffic Flow
- Parking Areas
- Backing Avoidance
- Loading & Unloading Zones
- “No Pedestrian” Areas

Areas of Temporary Traffic Control Zones

Most TTC zones are divided into four areas: the advance warning area, the transition area, the activity area, and the termination area.

Advanced Warning Area

The advance warning area is the section of highway where road users are informed about the upcoming work zone or incident area. This area is mandatory.

Transition Area

The transition area is the section of highway where road users are redirected out of their normal path. This area is mandatory.

Activity Area

The activity area is the section for the highway where the work activity takes place. It is comprised of the work space, the traffic space, and the buffer space. While work spaces & traffic spaces are unavoidable, buffer zones are optional.

Work Space - The work space is that portion of the highway closed to road users and set aside for workers, equipment, and material, and a shadow vehicle if one is used upstream. Work spaces are usually delineated for road users by channelizing devices or, to exclude vehicles and pedestrians, by temporary barriers.

Traffic Space – The traffic space is the portion of the highway in which road users are routed through the activity area.

Buffer Space - The buffer space is a lateral and/or longitudinal area that separates road user flow from the work space or an unsafe area, and might provide some recovery space for an errant vehicle.

Termination Area

The termination area is the section of the highway where road users are returned to their normal driving path. This area is optional.

Requirements of Traffic Control Devices

All traffic control devices must meet the following criteria:

- They must be used whenever working on all roads and shoulders.
- They must be “crashworthy” (i.e. they will not become a hazardous flying object if struck).
- They must fulfill a need (i.e. they shall be removed or covered when not in use).
- They must command attention (i.e. they must be easily seen).
- They must convey a clear and simple message (no conflicting information).
- They must command respect of public (i.e. avoid sloppy installation/display).
- They must give adequate time to respond (MUTCD placement requirements).

Lane Encroachments

A traffic lane must be closed and an appropriate merge or detour shall be established whenever the lane is encroached to the point that less than 10' remains clear.

Advanced Warning Signs

At least one (1) warning sign shall be placed whenever working within 15' from an active roadway. A second sign is recommended when the speed limit is at or above 45mph. A third sign is recommended when using a flagger.

The following chart shall be used when determining the proper placement of warning signs:

SIGN	25-30 MPH	35-40 MPH	45-55 MPH	Freeway/ Expressway
Sign Closest to Work Zone	100'	350'	500'	1000'
2 nd Sign from Work Zone	100'	350'	500'	1500'
3 rd Sign from Work Zone	100'	350'	500'	2640'

All signs used for TTC purposes must meet the following criteria:

- Signs must have an orange background with a black border and print.
- Signs must only have approved wording and symbols (MUTCD, Section 6F).

Channelizing Devices

All channelizing devices must meet the following criteria:

- Channelizing device types cannot be mixed.
- Channelizing devices have to be evenly spaced (no unexpected gaps).
- Channelizing devices have to be reflective or have beacons when used at night.
- Barricades cannot have sand bags on the rails.
- Stripes on the barricades have to point towards the merge.
- All channelizing devices must be kept clean and legible.

The following guide shall be used when selecting channelizing devices:

- 18" Cones = 40mph and Daytime
- 28" Cones = Speeds Above 40mph and Nighttime (if they have two reflective collars)
- 36" Drums = Lightweight Construction
- Type 1 Barricades = Urban Streets and Speeds under 40 mph
- Type 2 Barricades = Highway and Speeds above 40 mph
- Type 3 Barricades = Road Closures.

The following chart shall be used when determining how to place channeling devices in order to establish an appropriate taper length in a transition area:

Speed (S)	Merge Taper Length (L)
40 mph or less	$L = W \times S(\text{squared}) / 60$
45 mph or more	$L = W \times S$

Channelizing Devices *(continued...)*

After calculating the appropriate taper length, use the following chart to make any necessary adjustments:

Speed (S)	Merge Taper Length (L)
Merging Lanes	L
Shifting Lanes	1/2 L
Shoulder Work	1/3 L
Flagger Used	50' to 100' MAX
Distance Between Consecutive Merges	2 x L
Distance After Merge & Before Shift	1/2 L

Use the following criteria to determine how far apart to space channelizing devices:

- Transition with Flagger = 20' Maximum
- Transition without Flagger = 1 x Speed Limit
- Activity Area = 2 x Speed Limit

Flagging Requirements

Flagger operations are required when traffic in both directions must share a single lane for a limited distance. When this occurs, movement from each end shall be directed by a flagger.

Exception: "If the work space on a low-volume street or road is short and road users from both directions are able to see the traffic approaching from the opposite direction through and beyond the worksite, the movement of traffic through a one-lane, two-way constriction may be self-regulating."

Flagger Qualifications

Individuals who perform flagging operations must be able to:

- Receive and communicate instruction.
- Move and maneuver quickly.
- Control signaling devices.
- Perform well in stressful situations.
- Recognize danger and warn workers.

Flagger Performance

Flaggers must be positioned on the side of the road while facing traffic and they must remain focused on the sole task of flagging. They may not sit down, turn their back to traffic, or engage in other activities that could distract their attention (i.e. phone use, etc.).

Flagging Equipment

All flagging equipment shall meet the following criteria:

- Stop/Slow paddles must be used and placed on a rigid handle. Two-way communication devices should be used when there are obstructions in the work zone (including curves that may limit visibility).
- Radios shall be used when multiple flaggers cannot see each other.
- Flags can only be used for emergency situations.

Personal Protective Equipment (PPE)

Traffic vests must be worn by all employees who are exposed to vehicular traffic. PPE class and type shall be selected by the Competent Person. The following guide shall be used when selecting vests:

- Class I Vests are no longer approved near roadways.
- Class II Vests are required and currently approved for all applications.
- Class III Vests are *recommended* for Speed Limit > 50mph or when flagging and movements must be seen from 1/4 mile away.

Work Zone Inspections

A Competent Person must perform an informal site inspection (documentation not mandatory) before and after each shift, and whenever an incident occurs within a work zone.

Training Requirements

All employees who work in work zones must be trained on the potential hazards. Individuals who flag traffic in certain states may also be required to be certified before performing flagging duties. Contact the Corporate Safety Department for more information. Competent Persons shall be trained in their responsibilities.

Trench & Excavation Safety

Purpose

Identify hazards associated with trenching and excavating operations & prescribe the necessary precautions to avoid incident.

Scope

This section applies to all Miller Pipeline employees.

Definitions

Competent Person - One who is capable of identifying existing hazards and is authorized to take prompt corrective measures in order to eliminate them.

Excavation - Any man-made cut, cavity, trench, or depression in an earth surface.

Hazardous Atmosphere - An atmosphere which by reason of being explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen deficient, toxic, or otherwise harmful, may cause illness or death.

Protective System - A method of protecting employees from excavation cave-ins. Common types of protective systems include: sloping, benching, shielding & shoring.

Responsibilities

Safety Director

Ensure the procedures of this policy are followed and supported by all employees.

Foreman

Perform the duties of the “competent person” prescribed by this policy, such as: conducting frequent inspections, classifying soil, designing protective systems, and overseeing the installation/removal of protective systems.

Procedures

Basic Excavation Safety

An “Excavation Competent Person” must be present and named on the jobsite whenever excavating is being performed. These individuals will be issued comprehensive formal training, so they are well equipped to identify excavation hazards & given authority to stop a job until those hazards are corrected. The competent person is responsible for such things as 1) inspecting the excavation prior to entry; 2) testing the atmosphere; 3) removing workers if conditions dictate, etc. Competent persons should examine the possibility of cave-ins, failures or protective systems, etc. If problems are found, provisions should be made for immediate personnel removal.

At least 48-hours prior to conducting any excavation work, a request shall be submitted to 811 for locating & marking all nearby underground utilities. When utility companies or clients cannot respond to a request to locate underground utility installations within 24 hours, or cannot establish exact location of these installations, employees may proceed, provided they do so with caution and provided detection equipment or other acceptable means to locate utility installations are used. Once all utilities are marked, they shall be safely exposed using soft digging methods. Mechanized equipment must stay at least 18-36 inches away from underground utilities (which is to include half the diameter of the utility present), depending on state laws.

All nearby objects that could become unstable while excavating shall be properly secured before mechanized equipment is used (e.g. trees, fences, signs, etc.).

Undermining shall be avoided, or the object must be underpinned. Any undermining that occurs under a building or other large structure must be approved by a Registered Professional Engineer.

When excavation operations are performed near roadways employees shall wear traffic vests (Class 2 minimum), and park vehicles to serve as barriers between the work area and traffic. If work is performed on a roadway, then 28" traffic cones must be placed around the work area and all equipment. Advanced warning signs shall also be set at all construction entrances. Flagger, arrow boards, and other traffic control devices shall also be used if traffic patterns are altered.

All employees and pedestrians should stand at least 10' from excavating equipment while it's in operation and never stand under a suspended load or within the swing radius of the boom (this includes employees who are spotting utilities for the operator).

Excess spoil, rocks & other loose debris must be kept at least 2-feet away from trench edges.

If soil is discolored, an oily sheen appears on top of ground water, or if there is a foul odor, the crew shall stop work immediately and notify the Safety Director. The source of contamination will then be identified, monitoring will be conducted, and precautions may be taken if necessary to avoid exposure. This is especially critical in trenches that are 4' or deeper.

Before an employee enters an excavation greater than 4 feet in depth, the competent person must test the atmosphere where oxygen deficiency or a hazardous atmosphere exists or could reasonably exist (i.e., excavations in landfill areas or excavations in areas where hazardous substances are stored nearby). Emergency rescue equipment is readily available and attended when hazardous atmospheric conditions exist or may develop.

Employees are not permitted to work in excavations where water has accumulated or is accumulating unless adequate precautions have been taken. Diversion ditches, dikes, or other means are used to prevent surface water from entering an excavation and to provide drainage to the adjacent area.

A ladder, steps, or a ramp must be placed every 25' of lateral travel for employees in excavations that are over 4' deep.

Temporary walkways will be placed over excavations when employees are required to cross them. These walkways must be at least 20" wide and overlap the excavation by 24" on each side. They must also be equipped with guardrails if the trench is over 6' deep and 30" wide.

Excavations must be properly barricaded to prevent unauthorized entry before they are left unattended. The material used for this must be durable, highly visible, and drawn tight to prevent unauthorized entry. In most cases construction fencing or 2-3 rows of caution tape will suffice. Proper protection from "attractive nuisance" should be done prior to work in an excavation.

Protective Systems

A protective system such as sloping/benching, shoring, or shielding (i.e. trench boxes) must be used if an excavation is greater than 5' deep or otherwise deemed unsafe by the Competent Person. Each of these systems shall be installed & used as approved by OSHA and/or the manufacturer. The following guidelines shall be followed when using protective systems:

Benching/Sloping

- Designed by a Registered Professional Engineer (RPE) when over 20' deep.
- No work can be done on the face of the slope/bench.

- Stable Rock: Can have vertical walls.
- Type A Soil: Must be sloped/benched at ¾:1 ratio.
- Type B Soil: Must be sloped/benched at 1:1 ratio.
- Type C Soil: Must be sloped at 1½:1 ratio (type C soil cannot be benched).

Shielding (Trench Boxes)

- Tabulated data must be kept onsite.
- Maximum rated depth cannot be exceeded.
- Must place 12" from adjacent walls or backfilled at least halfway.
- Pins must be placed and kept in all cross braces.
- The ends of the trench must be protected from collapse.
- Boxes may be stacked if they are designed to stack (welding not allowed).
- May shield the bottom of a trench and slope down to the box (however if this is done, then the box must extend at least 18" out of the trench).

Shoring

- All systems must be designed according to the manufacturer's "Tabulated Data".
- Tabulated Data Sheets must be maintained onsite.

Support Systems, Shield Systems, and Other Protective Systems

All materials and equipment used for protective systems shall be free from damage or defects that might impair their proper function. If damaged they must be inspected and repaired, if necessary. When material or equipment that is used for protective systems is damaged, a competent person shall examine the material or equipment and evaluate its suitability for continued use. If the competent person cannot assure the material or equipment is able to support the intended loads or is otherwise suitable for safe use, then such material or equipment shall be removed from service, and shall be evaluated and approved by a registered professional engineer before being returned to service.

Timber Shoring

When trenches do not exceed 20 feet, timber shoring according to OSHA design specifications may be used. Designs for timber shoring in trenches for company work sites are determined by the competent person using the following method(s):

- Use the requirements set forth by OSHA in Appendices A and C of the 29 CFR 1926, Subpart P. The design specifications for timber shoring provided by OSHA may be found in Tables C-1.1 through C-1.3 of Appendix C of 29 CFR 1926, Subpart P. These tables refer to the actual dimensions and not nominal dimensions of the timber. If the competent person chooses to use nominal size shoring, he/she must use the additional tables found in Appendix C of 29 CFR 1926, Subpart P. The soil type in which the excavation is made must be determined in order to use the OSHA data. NOTE: The specifications do not apply in every situation experienced in the field; the data were developed to apply to most common trenching situations. If the specifications do not apply to the situation encountered in the field, the competent person will make a determination of what approach to use to allow safe protective support of the excavation.
- Use data provided by the manufacturer of the support system.
- Use other tabulated data approved by an engineer.
- Have a registered professional engineer design the system.

Aluminum Hydraulic Shoring

Determined by the competent person, each design for aluminum hydraulic shoring is based upon the following method(s):

- Use the manufacturer's tabulated data and design in accordance with the manufacturer's specifications, recommendations, and limitations. Deviations from the manufacturer's specifications, recommendations, or limitations are only allowed upon written approval of the manufacturer, which must be obtained by the competent person prior to implementation. The written approval is kept at the job site during construction of the protective system.
- Use the OSHA specifications found in Appendix D of 29 CFR 1926, Subpart P, if the manufacturer's tabulated data cannot be utilized. NOTE: Before using the OSHA data, the soil type must be determined.
- Use other tabulated data approved by an engineer.
- Have a registered professional engineer design the system.

Other Protective Systems

Designs for our support systems are determined by the competent person using the following method(s):

- Use data provided by the manufacturer of the support system.
- Use other tabulated data approved by an engineer.
- Have a registered professional engineer design the system.

Shielding

Shields shall be installed in a manner to restrict lateral or other hazardous movement of the shield in the event of the application of sudden lateral loads. Employees shall not be allowed in shields when shields are being installed, removed, or moved vertically. Additional requirement for shield systems used in trench excavations. Excavations of earth material to a level not greater than 2 feet (.61 m) below the bottom of a shield shall be permitted, but only if the shield is designed to resist the forces calculated for the full depth of the trench, and there are no indications while the trench is open of a possible loss of soil from behind or below the bottom of the shield. As determined by the competent person, designs for shielding are based upon the following method(s):

- Use data provided by the manufacturer of the support system.
- Use other tabulated data approved by an engineer.
- Have a registered professional engineer design the system.

Other Protective Systems

Designs for our protective systems are determined by the competent person using the following method(s):

- Use data provided by the manufacturer of the support system.
- Use other tabulated data approved by an engineer.
- Have a registered professional engineer design the system.

Inspections & Soil Classification

Competent persons shall conduct a visual and manual inspection of each trench before initial entry, as conditions change (i.e. earthquake, rainstorm, etc.), and daily thereafter. The focus of these inspections will be to determine if a trench needs to be protected, how it should be protected, and to make sure any protective systems already installed are still adequate. These inspections will be documented by completing the *Excavation Inspection Log* (located in the Forms Section). If a trench is deemed as needing a form of trench protection, then the competent person shall determine what the soil type of the excavation is. These soil types are as follows:

- **STABLE ROCK:** Solid mineral matter without any cracks or fissures.
- **TYPE A SOIL:** Cemented or cohesive soils with an unconfined compressive strength of 1.5 ton per square foot or higher. This soil may not have any cracks/fissures; it cannot be exposed to vibration; it cannot be previously disturbed; and it cannot have freely seeping water or be submerged.
- **TYPE B SOIL:** Cohesive or granular soils, and *dry unstable* rock, with an unconfined compressive strength between 0.6 and 1.4 ton per square foot. This soil cannot have freely seeping water or be submerged.
- **TYPE C SOIL:** Cohesive or granular soils with an unconfined compressive strength of 0.5 ton per square foot or less. This classification also includes any soil that is submerged, as well as unstable rock with freely seeping water.

Current Certified Competent Persons

Under no circumstances shall an employee create or work in an excavation unless there is a competent person that has successfully completed this company's excavation training program on site to supervise. This includes all new competent persons regardless of claimed previous experience.

Non-excavation Worker Protection

To protect employees who don't work in or around excavations, but who may become bystanders, we require that all surface encumbrances that are located so as to create a hazard to employees shall be removed or supported, as necessary, to safeguard these employees.

Recordkeeping

We keep a copy of the following documents at the job site during construction of a particular excavation protective system and then store them where they will be readily available to OSHA upon request:

- Tabulated data for designing any of our sloping or benching systems.
- Designs of any sloping or benching systems approved by a registered professional engineer.
- Manufacturer's specifications, recommendations, and limitations for designs of support systems, shield systems, and other protective systems drawn from manufacturer's tabulated data.
- Manufacturer's approval to deviate from the specifications, recommendations, and limitations for designs of support systems, shield systems, and other protective systems drawn from manufacturer's tabulated data.
- Tabulated data for designing any of our support systems, shield systems, and other protective systems.
- Designs of all support systems, shield systems, and other protective systems approved by a registered professional engineer.

Training Requirements

All Foremen will be trained as competent persons. This training will include such topics as: an overview of OSHA's Subpart P, basic excavation safety, conducting inspections, classifying soil types, and the proper installation of various protective systems.

All new employees will be trained on the contents of this policy during Safety Orientation.

Vacuum Excavation (Air)

Purpose

The purpose of this policy is to educate the operator on general guidelines/best practices and regulatory requirements associated with air vacuum excavation and the use of air vacuum excavating machines. All work must be completed in accordance with Federal OSHA guidelines and applicable state and/or regional authority

Scope

This program applies to all operators and helpers on air vacuum machines and operations. All work must be completed in accordance with applicable Federal, state, and local requirements.

Definitions

Air vacuum excavating is the process of removing or moving soil with compressed air. A vacuum is then used to transport the material to a debris tank. This allows for a non-destructive and more accurate way to excavate soil and locate underground utilities.

Procedures

Operations

Prior to any excavation, the appropriate One Call agency (811) shall be notified in advance to locate all underground structures and utilities.

All excavating must be performed with non-conductive tools, air probe and suction hose.

Before locating a petroleum product line and/or high-pressure transmission line, the owner or representative with the company must be present before excavation and during the entire exposure and backfill process.

Where a utility line is found during excavation that was not identified by the locator, but within the area of the locate ticket, the excavator shall never assume the line is an abandoned utility line. The Foreman shall immediately contact the One Call agency, to determine if the utility is live or abandoned.

Personal Protective Equipment (PPE)

All standard Miller PPE including eye protection (safety glasses or goggles), head protection (hard hats), hearing protection, foot protection, hand protection, fireproof clothing respirators, and high-viz safety vest shall be worn while performing air vacuum excavation work. Face shields should be utilized where practical or required by our customer.

DIELECTRIC GLOVES

When Die- Electric rubber gloves are required the following table shall be used to determine maximum use ratings.

Table 3 Classes of Rubber Gloves

Class	AC Proof Test Voltage	Maximum Use Voltage
1	10,000	7,500
2	20,000	17,000
3	30,000	26,500
4	40,000	36,000

Note: Protectors shall be free of rips, tears, and/or contaminants that could expose the rubber glove to damage.

Die- Electric gloves shall never be worn inside out or without leather protectors. Nor shall leather protectors be worn alone as work gloves.

Die- Electric gloves shall be inspected for corona cracks or other damage, and the gloves shall be air or water tested at the beginning of the work period and at any other time when their condition is in doubt.

Die- Electric gloves, when not in use, shall be kept in canvas bags or other approved containers and stored where they will not become damaged from sharp objects or exposed to direct sunlight.

Die- Electric gloves shall be stored in the glove bag with the cuffs down to permit drainage and keep foreign objects and debris from entering the glove causing damage.

6.1.43 Inner liners may be worn if desired.

Die- Electric gloves shall be laboratory tested in accordance with both ASTM and OSHA standards (see Table 4).

Table 4 Minimum Electrical Inspection Schedule for Rubber Insulating Goods

Type of Equipment	When to Test
Die- Electric insulating gloves	Before first issue and every 6 months thereafter*, upon indication that insulating value is suspect, and after use without protectors
*If the insulating equipment has been electrically tested but not issued for service, the insulating equipment may not be placed into service unless it has been electrically tested within the previous 12 months.	

Test schedules can vary by client and area management. Check with your local safety representative for differing requirements in your area.

An efficient method of stamping shall be used to show the last date of the laboratory test on all Die-Electric rubber sleeves, blankets, and gloves.

DIELECTRIC BOOTS – USE AND CARE

When the use of Die-Electric Boots are required, the following guidelines shall be implemented:

When Die-Electric Boots are required the following table shall be used to determine maximum use ratings.

Table 5 Classes of Rubber Boots

Class	AC Proof Test Voltage	Maximum Use Voltage
1	10,000	7,500
2	20,000	17,000
3	30,000	26,500
4	40,000	36,000

Note: Boots shall be free of rips, tears, and/or contaminants.

Die- Electric Boots shall be worn over approved company footwear.

Die-Electric Boots shall be inspected for cracks or other damage and shall be inspected at the beginning of the work period and at any other time when their condition is in doubt.

Die- Electric Boots, when not in use, shall be kept in approved containers and/or stored where they will not become damaged from sharp objects or exposed to direct sunlight.

Die- Electric Boots shall be laboratory tested in accordance with both ASTM and OSHA standards (see Table 4).

Test schedules can vary by client and area management. Check with your local safety representative for differing requirements in your area.

An efficient method of stamping shall be used to show the last date of laboratory test on all Die-Electric Boots.

Clothing and Jewelry

Clothing attire should be in good condition and appropriate for a construction site. Loose clothing is prohibited, which could result in a catch or impale hazard.

Necklaces, bracelets and rings are strictly prohibited when excavating, as these can become hung on objects and tooling.

Vacuum Hose Blockages

If the vacuum hose becomes blocked at the end of the hose, the vacuum brake valve can be opened to release suction and the blockage removed. If the blockage is between the ends of the hose, the supplied rubber mallet can be used to dislodge the blockage and/or the flow can be reversed by removing the vacuum hose and placing the opposite end in the soil collector with the vacuum running.

Vehicle Operation

Only qualified operators will be allowed to operate the vacuum truck. This will be done to ensure the safe operation of the vehicle and safety of the personnel involved. All vacuum truck operators will be trained and properly licensed in accordance with all applicable regulations. A DVIR (Driver Vehicle Inspection Report) must be performed daily prior to and after each shift.

Training Requirements

All operators will be trained upon work assignment. Training will be conducted through classroom and on the job training.

Vacuum Excavation (Hydro)

Purpose

The purpose of this policy is to educate the operator on general guidelines/best practices and regulatory requirements associated with hydro-excavation and the use of hydro-excavation machines. All work must be completed in accordance with Federal OSHA guidelines and applicable state and/or regional authority.

Scope

This program applies to all operators and helpers on hydro-excavators and operations. All work must be completed in accordance with applicable Federal, state, and local requirements.

Definitions

Hydro-excavation is the process of removing or moving soil with pressurized water. A vacuum is then used to transport the material to a debris tank. This allows for a non-destructive and more accurate way to excavate soil and locate underground utilities.

Procedures

Operations

Prior to any excavation, the appropriate One Call agency (811) shall be notified in advance to locate all underground structures and utilities.

Before locating a petroleum product line and/or high-pressure transmission line, the owner or representative with the company must be present before excavation and during the entire exposure and backfill process.

Where a utility line is found during excavation that was not identified by the locator, but within the area of the locate ticket, the excavator shall never assume the line is an abandoned utility line. The Foreman shall immediately contact the One Call agency, to determine if the utility is live or abandoned.

Personal Protective Equipment (PPE)

All standard Miller PPE including eye protection (safety glasses or goggles), head protection (hard hats), hearing protection, foot protection, hand protection, and high-viz safety vest shall be worn while performing hydro-excavation work. Also face shields in addition to eye protection shall be worn when excavating at the beginning of an excavation, until the depth of the excavation is at least 24 inches deep.

DIELECTRIC GLOVES

When Die- Electric rubber gloves are required the following table shall be used to determine maximum use ratings.

Table 3 Classes of Rubber Gloves

Class	AC Proof Test Voltage	Maximum Use Voltage
1	10,000	7,500
2	20,000	17,000
3	30,000	26,500
4	40,000	36,000

Note: Protectors shall be free of rips, tears, and/or contaminants that could expose the rubber glove to damage.

Die- Electric gloves shall never be worn inside out or without leather protectors. Nor shall leather protectors be worn alone as work gloves.

Die- Electric gloves shall be inspected for corona cracks or other damage, and the gloves shall be air or water tested at the beginning of the work period and at any other time when their condition is in doubt.

Die- Electric gloves, when not in use, shall be kept in canvas bags or other approved containers and stored where they will not become damaged from sharp objects or exposed to direct sunlight.

Die- Electric gloves shall be stored in the glove bag with the cuffs down to permit drainage and keep foreign objects and debris from entering the glove causing damage.

6.1.43 Inner liners may be worn if desired.

Die- Electric gloves shall be laboratory tested in accordance with both ASTM and OSHA standards (see Table 4).

Table 4 Minimum Electrical Inspection Schedule for Rubber Insulating Goods

Type of Equipment	When to Test
Die- Electric insulating gloves	Before first issue and every 6 months thereafter*, upon indication that insulating value is suspect, and after use without protectors
*If the insulating equipment has been electrically tested but not issued for service, the insulating equipment may not be placed into service unless it has been electrically tested within the previous 12 months.	

Test schedules can vary by client and area management. Check with your local safety representative for differing requirements in your area.

An efficient method of stamping shall be used to show the last date of the laboratory test on all Die-Electric rubber sleeves, blankets, and gloves.

DIELECTRIC BOOTS – USE AND CARE

When the use of Die-Electric Boots are required, the following guidelines shall be implemented:

When Die-Electric Boots are required the following table shall be used to determine maximum use ratings.

Table 5 Classes of Rubber Boots

Class	AC Proof Test Voltage	Maximum Use Voltage
1	10,000	7,500
2	20,000	17,000
3	30,000	26,500
4	40,000	36,000

Note: Boots shall be free of rips, tears, and/or contaminants.

Die- Electric Boots shall be worn over approved company footwear.

Die-Electric Boots shall be inspected for cracks or other damage and shall be inspected at the beginning of the work period and at any other time when their condition is in doubt.

Die- Electric Boots, when not in use, shall be kept in approved containers and/or stored where they

will not become damaged from sharp objects or exposed to direct sunlight.

Die- Electric Boots shall be laboratory tested in accordance with both ASTM and OSHA standards (see Table 4).

Test schedules can vary by client and area management. Check with your local safety representative for differing requirements in your area.

An efficient method of stamping shall be used to show the last date of laboratory test on all Die-Electric Boots.

Clothing and Jewelry

Clothing attire should be in good condition and appropriate for a construction site. Loose clothing is prohibited, which could result in a catch or impale hazard.

Necklaces, bracelets and rings are strictly prohibited when excavating, as these can become hung on objects and tooling.

High Pressure Water

The maximum water pressure to be used cannot exceed 2500 psi. All pressure measurements are to be taken at the hydro-excavator (truck, pump). It may be necessary and/or required to lower water pressure while excavating near petroleum or transmission lines to minimize the risk of damage to the pipe coating.

Straight tip nozzles are strictly prohibited, rotary nozzles are to be used and should have a protective neoprene cover, with no bare metal exposed.

A distance of eight inches shall be maintained between the end of the pressure wand nozzle and the utility or subsoil.

The wand shall never remain motionless during excavation. Aiming directly at the utility is prohibited, instead a sweeping motion moving perpendicular over the utility is preferred.

Blockages or Moving the Dig Tube

The vacuum should be turned off prior to unclogging objects stuck in the dig tube.

When rotating the boom around the truck, the dig tube must keep a minimum distance of 24 inches (2ft) from the ground. If at any time the tube is above 24 inches (2ft), the vacuum must be turned off.

Dig tube must have a neoprene or soft material at the bottom of tube, exposed metal or rigid plastic is strictly prohibited.

Excavation in the Vicinity of Energized lines; Underground and Overhead

Dielectric Boots and Gloves (see electrical glove guidelines attached) shall be worn when spotting energized lines.

Excavator shall remain untouched during the process of excavating energized lines, employees without the proper protective equipment shall remain 6 feet from the truck during the excavation.

When removing the dig tube from excavation, observe boom movement and safe distances from overhead lines.

When working in the vicinity of overhead electrical lines, boom movement shall be monitored and communicated with the operator.

Seat the boom during any movement of truck.

Position truck so that there is no interference with overhead lines.

Table 1 – Safe Limits of Approach

Nominal phase-to-phase Voltage rating	Minimum Distance
50 kV or below	10 feet
50 kV and above	10 feet plus 4 inches for Every 10 kV over 50

Training Requirements

All operators will be trained upon work assignment. Training will be conducted through classroom and on the job training.

Welding & Cutting

Purpose

Identify and control hazards associated with performing hot work, comply with Federal OSHA regulations and assist the company in achieving our overall goal of maintaining a safe workplace.

Scope

This section applies to all employees of Miller Pipeline who conduct hot work as part of their normal work activities.

Definitions

Fire Watch: An employee who monitors hot work activities & responds to any type of ignition. This person will be equipped with a charged extinguisher, perform only the duty of watching for & responding to fires, and wait at least 30-minutes after the activity to monitor for smoldering materials. This person must receive fire extinguisher training annually. Assigned fire watchers will be trained in the use of fire extinguishing equipment and familiar with the facilities for sounding an alarm in the event of a fire.

Responsibilities

Safety Director

Ensures the procedures of this policy are followed and supported by all employees.

Foreman

Ensures that all employees expected to perform hot work are familiar with the process and the safety precautions to take while using it by witnessing them demonstrate their competency.

Reviews *Hot Work Permits*, gives final authorization to perform the work, and forwards all completed permits to the Safety Director.

Enforces the guidelines addressed in this policy.

Employees

Complete the *Hot Work Permit* (located in the Forms Section) and request authorization from the Foreman prior to work, post the permit while conducting work, and return it to the Foreman upon completing the job.

Act as a fire watch when designated by the Foreman to do so (when welding, cutting, brazing and/or soldering is performed near combustible materials and/or locations where fire may develop).

Procedures

Qualified Employees

Only employees who have knowledge, experience and ability to understand the hazards that are associated with the work involved and the various precautions to take when attempting to control them will be allowed to perform welding, cutting or brazing. Individuals performing welding/cutting must be suitably trained in the safe operations of their equipment and the safe use of the process. The knowledge and ability of these employees will be evaluated by the Foreman.

Employees designated to perform hot work activities will conduct informal inspections of all equipment (i.e. cylinders, gauges, hoses, torches, etc.) on a daily basis.

Operators will fill-out the *Hot Work Permit* (located in the Forms Section) prior to conducting welding, cutting or brazing in a potentially hazardous environment. Upon filling-out this permit, the Foreman will give final authorization to conduct the work and the operator will post the permit in the work area. This permit will remain posted until the work is complete. The permit will then be completed and returned to the Foreman who will then forward it onto the Safety Director to be maintained on file.

Gas Welding & Cutting

All cylinders (oxygen and fuel gas) will be safely used, handled, transported, moved, stored and secured according to the Compressed Air and Gas Section located in this Health & Safety Program.

Gauges and lenses will remain functional and the lens free from cracks or scratches.

Hoses will be equipped with flashback arresters.

Valves will be opened only 1.5 turns and all wrenches and tools needed to operate valves will be located by the equipment and ready for use whenever conducting work.

Cables will remain distinguishable, and less than 4 inches of the hose will be taped every foot.

Welders will only be allowed to use friction lighters when striking an arc. Striking an electrode against a cylinder or the use of matches will not be permitted.

Arc Welding and Cutting

Electrode holders will remain fully insulated and be kept clear of wet areas at all times. Electrodes will be removed and the power supply switch opened whenever the equipment is to be unattended.

Cables will be of the flexible type and free from damaged insulation or exposed wire. Splices will not be allowed within 10 feet of the electrode holders. Cables will not be permitted to stand in resting water or damp floor conditions.

The grounding clamp will remain in good shape to provide a proper ground and completely secured to a good ground source whenever work is being done.

The frame will be equipped with a three-wire cord or a separate grounding wire will be used. The lead terminals of the frame will be equipped with rubber boots and a panel cover whenever work is conducted.

All damaged equipment will be immediately tagged as "DO NOT USE" and removed from service until repairs can be made. Repairs shall be made only by qualified personnel.

Fire Prevention Considerations

Hot work will only be conducted in designated locations. Hot work will not be permitted in areas that contain flammable or combustible materials. If these materials are in an area in which work must be performed, then one of the following actions will be taken to prevent fire/explosion:

- Move all flammable and combustible materials 35 feet from the work area
- Move the materials to be worked on 35 feet from all flammable and combustible materials (If the object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards, shields, fire blankets, etc. shall be used to confine the heat, sparks and slag and to protect the immovable fire hazards. If this cannot be obtained, then welding/cutting shall not be performed.)
- Assign an employee to act as a fire watch (refer to *Definitions* for responsibilities)

Employees who perform hot work as part of their normal job functions will inspect the designated area for fire hazards prior to beginning work. A class ABC fire extinguisher will be located within 10 feet of all hot work operations.

A determination will be made regarding the former contents of containers prior to hot work or cutting. Containers that have been identified as previously containing flammable/combustible materials will be completely filled with water, or thoroughly cleaned, ventilated and tested before the ignition source is introduced.

All containers that are sealed will first be opened or a vent created prior to applying heat to allow built-up pressure to release.

Personal Protective Equipment

Employees who perform hot work or cutting will protect themselves against physical harm by wearing the following PPE:

- Welding hood or rated goggles
- Flame retardant jacket or at least long sleeves
- Flame retardant gloves
- Leather boots
- Long pants

Whenever hot work is done on an elevated surface, guardrails will be installed or a body harness will be worn to protect the worker from fall hazards.

If other employees in the area may be subject to flash burn, then light curtains will be installed in the area.

When employees conduct hot work in a confined space they will either install a type of mechanical ventilation or wear an airline respirator. A shield will also be used when possible.

Ventilation

Whenever employees weld or cut in a restricted work area that has the potential to entrap vapors and gasses or before welding or cutting potentially toxic metals (e.g. stainless steel, manganese, etc), a type of ventilation or local exhaust will be used. This ventilation will be capable of removing all contaminants from the area and replacing them with clean respirable air.

Hot work with certain types of bearing, base and filler metals require the use of either mechanical ventilation or local exhaust system. These metals include Beryllium, Cadmium, Chromium, Lead, Mercury and Zinc. Chlorinated solvents must be at least 200 feet from hot work activities.

Atmospheres must be monitored, permits must be completed, mechanical ventilation or airline respirators must be utilized, and all provisions of the Confined Space Entry plan must be followed whenever an employee is required to conduct hot work in a confined space.

Preservative Coatings

Employees will completely strip all coated surfaces at least 4 inches on each side of the work location whenever the chemical content of the coating is not known, an SDS is not present, or when the coating is conceived to be flammable or toxic.

Work in Confined Space

As used herein, confined space is intended to mean a relatively small or restricted space such as a tank, boiler, pressure vessel, or small compartment of a ship.

Ventilation

Ventilation is a prerequisite to work in confined spaces. Local exhaust or general ventilating systems shall be provided and arranged to keep the amount of toxic fumes, gases, or dusts below the maximum allowable concentration. Special consideration must be given to prevent the possible evolution of hazardous fumes, gases, or dust according to the metals involved. Any welding cutting or burning of lead-based metals, zinc, cadmium, mercury, beryllium, or exotic metals or paints shall have proper ventilation and/or respiratory protection.

Securing Cylinders and Machinery

When welding or cutting is being performed in any confined spaces the gas cylinders and welding machines shall be left on the outside. Before operations are started, heavy portable equipment mounted on wheels shall be securely blocked to prevent accidental movement.

Lifelines

Where a welder must enter a confined space through a manhole or other small opening, means shall be provided for quickly removing him in case of emergency. When harnesses and lifelines are used for this purpose, they shall be so attached to the welder's body that his body cannot be jammed in a small exit opening. An attendant with a preplanned rescue procedure shall be stationed outside to observe the welder at all times and be capable of putting rescue operations into effect.

Electrode Removal

When arc welding is to be suspended for any substantial period of time, such as during lunch overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur, and the machine disconnected from the power source.

Gas Cylinder Shutoff

In order to eliminate the possibility of gas escaping through leaks of improperly closed valves, when gas welding or cutting, the torch valves shall be closed and the fuel-gas and

oxygen supply to the torch positively shut off at some point outside the confined area whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. Where practicable the torch and hose shall also be removed from the confined space.

Warning Sign

After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

First-Aid Equipment

First-aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First aid shall be rendered until medical attention can be provided.

Training Requirements

This section will be covered during Safety Orientation. Each certified welder or cutter is evaluated to verify that the welder or cutter has retained and uses the knowledge and skills needed to operate safely. This evaluation is done by the supervisor. If the evaluation shows that the welder or cutter is lacking the appropriate skills and knowledge, the welder or cutter is retrained by our instructor(s). When a welder or cutter has an accident or near miss or some unsafe operating procedure is identified, we provide retraining.

Wildfire Prevention

Purpose

This guide covers the basics of wildfire prevention, how wildfires start and spread, how to safely put out or control a wildfire once it starts, and how to protect our employees and others from fires that are out of control.

Scope

Wildfires have enormous potential for destruction. The risk has increased as development spreads into fire-prone areas. Under the right conditions, fires are possible in any area. For the safety of our employees, and for the safety of others living nearby, it is imperative that our operations are not the cause of wildfires.

Definitions

Competent Person – A person who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them [29 CFR 1926.32(f)].

Crown fire – a fire that advances by moving among crowns of trees or shrubs.

Duff – the layer of decomposing wood material that lies on the forest floor between surface fuels and soil.

Fuel – materials, both living and dead, that are combustible.

Ground fire – fire that burns the organic material in the soil layer (e.g., peat fire) and often also the surface litter and low-growing vegetation.

Litter – the top layer of forest floor, typically composed of loose debris such as branches, twigs, and recently fallen leaves or needles.

Mineral soil – soil layer below the duff and topsoil, containing little or no organic soil.

Wildfire – a free burning and unwanted wildland fire requiring suppression action.

Procedures

Fire Triangle

Three things are necessary to ignite and sustain a fire: heat, fuel and oxygen. Fires can be prevented or controlled by limiting any one or more of these essential components. For example, rakes and other tools can be used to separate fire from fuel. Covering a fire and embers with soil deprives the fire of oxygen. Heat can ignite or sustain fire when fuel and oxygen are available. Sources of heat can include lightning, matches, cigarettes, exhaust systems of equipment, and sparks from any source.

Conditions that Lead to Wildfire

Wildfires can occur naturally. In wilderness areas, fires are often allowed to burn, because they reduce the overgrown, dense stands of trees and brush, and allow the forest to renew. In some areas, controlled burns are performed to improve conditions and reduce the threat of a major fire. However, when people or property are threatened, fires must be controlled.

The risk of fire depends on local conditions, including weather, available fuel, and topography. For example, dry and windy conditions create a higher risk. Steep slopes can enhance the spread of fire, and narrow valleys or canyons can increase the effect of wind (Figure 1).

Drought conditions can create extreme fire danger even in areas where fires are uncommon. Long-term drought leads to more dead and dying trees, which adds to the available fuel load.

Sparks and embers caused by trees contacting power lines, or sparks or flame caused by malfunctioning electrical equipment on utility poles, can ignite wildfires.

Prevention Measures

1. Follow the rules! Make sure that your actions do not create a situation that could cause a fire to start.
2. Do not smoke in fire prone areas. If you must smoke, smoke only in designated areas as permitted. Never flick ashes or butts onto dry forest floors or grass. Take cigarette butts with you and dispose of them properly.
3. Do not park vehicles over dry grass or other flammable materials. The exhaust systems are hot enough to ignite dry fuels. The same applies to gas powered tools and equipment.
4. Keep your equipment in good operating condition. Make sure that spark arrestors, mufflers and exhaust systems are clean and undamaged.
5. Be aware of conditions. On high fire danger days, be especially vigilant. Officials may restrict certain activities, including our operations, when conditions are extreme.



Evaluate Fire Risk

Take into account local conditions and any stated fire danger levels (e.g. moderate, high, very high, extreme). Be aware of fuel load, weather and topography. Brief all employees during the job brief on risk, mitigation, and evacuation procedures.

Jobsite supervisors should consider each job for the potential of wildfire. In those situations that result in a supervisor determining that a medium risk rating is appropriate, additional measures of prevention and planning are required. The fire risk rating will be based on job location terrain and the fire danger rating for the location of the job. The forecast fire danger class across the United States can be found at this website link: <https://www.wfas.net/>.

The following table indicates categories for terrain, the associated fire danger and the respective color-coded guidance concerning work controls.

Fire Danger as shown on current WFAS Fire Danger Class Map	Terrain				
	Level (1)	Level (2)	Level (3)	Level (4)	Level (5)
Low (1)	Low	Low	Low	Low	Medium
Moderate (2)	Low	Low	Low	Medium	Medium
High (3)	Low	Low	Medium	Medium	High
Very High (4)	Low	Medium	Medium	High	High
Extreme (5)	Low	Medium	Medium	High	Extreme

Terrain:

Level 1 Very Low Fire Hazard – Urban areas, cultivated agricultural lands, concrete, gravel, sand with little or no wild vegetation. This level also includes work right-of-way (ROW) whereby topsoil has been removed and/or mats have been installed.

Level 2 Low Fire Hazard – Suburban mostly landscaped areas including patches of Hardwood (e.g., oaks, hickories, maples, poplars) Mature pine plantations that are open underneath trees (few shrubs) Seasonally flooded swamps (e.g., cypress or bay swamps)

Level 3 Moderate Fire Hazard - Pine savannas (low density pines with grasses underneath) Grasslands, dry hay fields and high desert non landscaped rural and suburban location.

Level 4 High Fire Hazard - Desert brush, Dry Pine forests with shrubs 6 feet tall; may or may not have trees above the foothills with limited access.

Level 5 Extreme Fire Hazard - > 20% slope plus Desert brush, Dry Pine forests with shrubs 6 feet tall; may or may not have trees above the foothills with limited access.

Pre-work controls based on risk:

Low Risk – follow normal safe work practices

Medium Risk and greater:

- Each crew will have a “wild fire” competent person who reviews the fire risk rating for the job and develops a Fire Safety Work Plan.
- The competent person will assess the wild fire risk as part of their daily job hazard analysis.

Wildfire Prevention	Reference Manual	Miller Pipeline
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- Ensure all trucks have fire extinguishers. In addition, shovels and other grass/brush clearing equipment such as a weed eater, small chainsaw may be needed from time to time. The site-specific fire safety plan will determine if a water truck or other means of fire prevention is needed.
- Ensure that vehicle parking areas are free of high grass / weeds and flammable debris prior to parking vehicles
- Field supervisors and managers will address wild fire prevention needs and personnel in the project safety pre- plan.

During Work Controls

- A ground person will be a fire watch for the duration of the work.
- The competent person can make the decision on fire control and work scope based on factors and environment.
- When it is necessary to cross with or operate equipment on desert brush, grass or wild lands the travel route or place of operation shall be wetted down or otherwise rendered inert.
- Monitor/assess changing conditions which could change the risk of fire exposure.
- Photographs will be taken to document the controls in place.

Post work controls

- Once trucks are moved, a final walk will be performed by the crew to identify possible “hot spots” or potential fires could ignite prior to leaving their work zone.
- Only the competent person can deem an area “safe” prior to leaving the work zone.
- Smoking is only allowed on jobsites at locations deemed safe by the competent person.
- Employees will ensure all butts are completely extinguished in an approved receptacle and are removed from the jobsite.
- Smoking is NOT allowed near flammable liquids, near flammable grass/brush or any area deemed unsafe by the competent person.

Additional Items to address before working

- Prohibit non-emergency construction & maintenance during a high-risk fire weather warning as declared by National Weather service and Local responsible authority
- Ensure open communication pathways – for example: provide all crews with radio and cellular service that is operational along the entire length of the job to allow immediate reporting of fires.
- Require that all fires be reported to the fire agencies with jurisdiction in the Project area immediately upon ignition.
- Require the removal of hazards, dead decaying vegetation from work area

High Risk and greater: Work will be rescheduled if possible. Fire Safety Work Plan needs approval from senior operational leadership and the safety department.

- Fire watch with water truck / trailer with fire hose. Entire work area must be watered on the frequency of the fire safety work plan.

Extreme Risk work will not proceed

Control Behavior

Make sure that all employees understand smoking policies, proper equipment operation and other fire prevention measures. If there is a fire, employees should stay together and work as a team.

Equipment

Make sure that fire extinguishers are in place and are operational, and that required firefighting tools, if necessary, are in good condition and readily available. If employees are working away from vehicles, ensure that firefighting tools are nearby.

Fire Breaks and Water Sources

Know the location of roads, streams and other features that can serve as breaks to prevent the spread of wildfires. Water sources can be used to recharge back-pack pumps if necessary.

Define Escape Routes

Ensure that employees know how to get to safety if a fire gets out of control. Note surrounding terrain, available fuels and weather conditions, and then define your escape route. If possible, choose a route that will not block access to incoming firefighting personnel. This escape route shall be noted on the job briefing.

Establish a Meeting Point

In the event of a fire, all employees should know where to meet. The meeting point should be away from the anticipated path of a fire. If necessary, establish a secondary meeting point, to be used if the primary meeting point is inaccessible.

Cell Phone & Radio Coverage

In the event of a fire, it is essential to be able to provide critical information to emergency response personnel and to the Company. Before operating in fire-prone areas, know whether there is reliable cell phone or radio coverage. If not, ensure other means of communication are available (e.g., alternate carrier, satellite phone, radio boosters, etc.).

Make sure that contact information is available to call in the event of a fire.

911 EMERGENCY ASSISTANCE IS NOT AVAILABLE IN ALL AREAS

If a Fire Starts

If a fire starts, put it out, control it, or get to a safe location as necessary. Call emergency personnel as soon as possible. Stay calm and provide critical information. At a minimum, emergency personnel will need:

1. Your location – Know the name or number of the nearest road, and other important local information. Provide GPS coordinates if available.
2. Fire information – Where the fire is, its size, what it is burning, the direction it is moving, local topography, what is at risk (i.e., homes, structures, bridges, etc.) and potential fire breaks.
3. Hazards – Propane tanks, power lines, hazardous materials, or other potential dangers.
4. Water supply – Ponds, creeks, wells, etc.

5. Firefighting resources available – What tools and earth moving equipment do we have available on site.
6. Communication – A call back number/radio frequency.

Once emergency personnel have been notified, report the fire to the Company and provide as much information as possible.

If you can **safely** fight or extinguish the fire, do so using the tools and methods described in this guide.

Firefighting Methods

If a fire starts, make every effort to put it out or prevent it from spreading. When a fire is small, you have a better chance of keeping it under control. Remember that a sudden wind shift can affect the speed and direction of the fire.

Controlling a Fire

Remember the Fire Triangle – oxygen, fuel and heat. Removing any of these will extinguish the fire.

- Water is very effective in extinguishing fires since water removes the heat component.
- Smothering a fire with dirt removes the oxygen source and is useful in extinguishing small wildfires.
- Removing the fuel source (grass, leaves, pine needles and other dead vegetation) down to the soil is an effective way to help prevent the spread of active wildfires.

Containment

A fire is contained when it is surrounded by fire breaks or areas that have already burned. However, the fire can still spread, so employees should stay on site until emergency response teams take control.

Firefighting Tools

Extinguisher

The use of a typical ABC fire extinguisher is appropriate for the majority of work situations. However, “Type A” extinguishers are preferred for use on wildfires. Regardless of fire extinguisher type, make sure that there is adequate availability for use of extinguishers when needed.

To use a fire extinguisher, think PASS.

- P** – Pull the locking pin
- A** – Aim the nozzle at the base of the fire
- S** – Squeeze the trigger
- S** – Sweep side to side

Bottle Sprayers, Backpack Pumps, etc.

Focus the stream by placing a finger of the nozzle. Make sure that all pumping motions keep the water’s spray in a continuous wet line. Spray the water at the base of the flames.



Shovel

A round-pointed shovel can be used to cut through surface litter and duff to remove fuel ahead of a wildfire, or to extinguish the fire by throwing loose soil, sand and mineral soil at the base of the fire.

Rake

A MacLeod is a combination heavy duty rake and hoe tool used to cut through and clear matted litter and duff. Once the dead vegetation is removed, use the blade to scrape down to mineral soil. The four-toothed fire line hoe or Fyrake is designed to remove light duff and litter layer



USFS Spec McLeod Rake



JIM-GEM Fyrake

Training Requirements

Fire prevention should be included in annual training programs for all affected employees. The general content of this wildfire prevention procedure should be included therein.

Working Near Water

Purpose

Miller Pipeline does not perform any offshore work. In the event of high water (flood, backwater, etc.), situations may arise when emergency gas/electric shutoffs may need to be performed.

When practical, the utmost consideration will be given to shutting off the service at accessible locations prior to having employees enter water by boat or on foot.

Procedures

- 1) When in the course of their duties Miller employees are working from or riding in a boat (motorized or nonmotorized), Appendix A (below) shall be used to verify that the necessary safety procedures are being followed. The Daily Planning Huddle shall include a sign-off by all crewmembers that they have reviewed the JSA for working near water.
- 2) Any employee working near water will be required undergo company training to identify specific hazards while working near water.
- 3) At least one lifesaving skiff shall be immediately available at locations where employees are working over or adjacent to water.
- 4) Type I or II Coast Guard approved personal flotation devices shall be worn by Miller employees when an employee may fall into water where the danger of drowning exists, whether working from a boat, wading in water or working alongside of a body of water.
- 5) The flotation device(s) shall be maintained in safe condition and shall be inspected frequently enough to ensure that it does not have rot, mildew, water saturation and/or any other conditions that could render the device unsuitable for use.
- 6) An employee may cross streams or other bodies of water only if a safe means of passage is provided.
- 7) During floods or high water, combination sewers may overflow expelling sewage into the floodwater. Although this has been shown to present no immediate health hazard to employees, it is still recommended to utilize precautions, such as wearing rubber gloves, eye protection, covering open cuts/sores and using good personal hygiene in these situations.

OSHA Regulation(s) 1926.106

Appendix A – Boat Checklist

Boat Checklist (effective 3/10/05):

- A cell phone or radio will be available in the boat.
- The boat is Coast Guard approved.
- The weight limit on the boat nameplate must not be exceeded.
- The boat has an appropriate anchor and line to stabilize the boat.
- The boat has a dewatering device i.e. pump, scoop, can.
- Ring buoys with at least 90 feet of line shall be provided and readily available for emergency rescue operations. Distance between ring buoys shall not exceed 200 feet.
- The boat has an audible and visual distress signal. (horn, flare, light)
- The operator of a motorboat must meet state or local training guidelines. *
- No employee shall work near water alone.
- The motorboat has a fire extinguisher and first aid kit.
- When used at night, a boat must be equipped with proper lights.

*Boats with trolling motors are not considered motorized boats

Wading in Water Checklist:

- Waders will be provided when needed.
- A pole or similar device should be used to feel for holes, ditches, etc. The need for multiple employees to ensure safe work shall be discussed and agreed upon by employees and supervisor.
- A type I or II life vest shall be worn if danger of drowning exists.
- A harness and lifeline will be available when the situation deems it necessary.
- A cell phone or radio will be available to carry with the employee.
- Adequate lighting will be available.
- Employees will not wade into rushing water Hypothermia is possible.
- If employee falls into water, warm employee in a safe vehicle, use blankets, etc.

Training Requirements

Employees will be trained on this policy upon work assignment. Training information is available at the following sites:

www.in.gov/dnr

www.uscgboating.org



AN **ARTERA** COMPANY

Health & Safety Program

APPENDIX

COVID-19 Masking Guidelines

August 2021

**14 DAYS PAST
VACCINATION?**

NOT VACCINATED?



**WORKING OUTSIDE WITHIN
6-FEET OF OTHER EMPLOYEES**



**WORKING OUTDOORS AND
ABLE TO MAINTAIN 6-FEET
SOCIAL DISTANCE**



**RIDING IN A VEHICLE
WITH A CO-WORKER**



**RIDING IN A VEHICLE
BY YOURSELF**



**KNOCKING ON
HOMEOWNER DOORS**



**ENTERING
CUSTOMER HOMES**



PERFORMING LIGHT-UPS



**WORKING IN A BELL-HOLE
UNABLE TO MAINTAIN
6-FEET SOCIAL DISTANCE**



**ENTERING MILLER
PIPELINE OFFICES**



Good Morning,

The purpose of this message is to remind everyone of our masking protocols. As of today, our COVID-19 policies at Miller Pipeline have not changed and we will continue to require all employees (vaccinated or unvaccinated) to wear a mask while in a Miller Pipeline facility. Whether you have new employees going through new-hire orientation, team members in OQ training, picking up tools or coming in to handle paperwork, you must wear a mask in a Miller facility.

For our field employees, if you are unable to maintain adequate social distancing while performing a task, please put your mask on during that time. The same protocols would apply while riding with someone in a company vehicle. If our utility customer's policies are stricter, their policy supersedes what we have in place.

As you know, with the new Delta variant, things are rapidly changing. Our task force has been hard at work to offer an updated masking policy, but we have many factors to consider ensuring we keep your safety first and foremost. Vaccination, while not mandatory, is still the best way to protect ourselves against this pandemic.

If you wish to be vaccinated but are unable to schedule your appointment outside of work hours, talk to your superintendent or area manager to coordinate time off to get vaccinated during the day.

To learn more about the COVID-19 vaccination, which is at no cost to you, [click here](#).

Throughout the last 16 months, our safety procedures have been in place to protect our employees and to protect our ability to serve our customers. To this day, we continue to support our operations and customers with best in class service and I am amazed at what we have been able to accomplish.

We will continue to follow and monitor federal, state, and local guidance to ensure our protocols are appropriate, and align with applicable regulations and guidance. If external factors change, we will adapt and provide direction.

I sincerely appreciate your patience and dedication throughout the past 16 months.

Please do not hesitate to contact me or your manager with any questions, comments or concerns. Thank you,

Dale

Miller Pipeline has the discretion to modify this Safety Policy at any time, at its discretion, and with no advance notice, especially in response to any changes to CDC Guidance and/or Local, State, or Federal requirements.



AN ARTERA COMPANY

8850 Crawfordsville Road
Indianapolis, IN 46234
Phone 317-293-0278

Boot and Glove Reimbursement Form

INSTRUCTIONS: Complete all of the information below, please print. Attach all sales receipt(s) to this form and send it to the corporate office Attn: Payroll Dept. For complete details, please refer to the bottom of this form.

Employee Name _____

Address _____

City _____ State _____ ZIP _____

Store where boots were purchased _____

Date of Sale _____ Total cost of boots _____

Store where gloves were purchased _____

Date of Sale _____ Total cost of gloves _____

By signing below, I am acknowledging that the information provided above is accurate and that I have read and agree to the terms and conditions of the **Boot & Glove Reimbursement Policy**.

Employee Signature _____ Date _____

FOR OFFICE USE ONLY

Employee Number _____ Vendor Number _____

Gross Amount _____ G/L Number _____ Description _____ Boot & Glove Reimbursement _____

Scope: All sections of this policy, other than the EH Rating requirements for protective toed boots, are effective as of May 1, 2008, and supersedes all previous policies regarding reimbursement of personal protective equipment. The section of this policy that requires protective toed boots to be EH Rated became effective on May 1, 2009. All sections of this policy apply to full-time active employees who are required to wear protective toed boots and/or durable gloves.

Requirements: All employees are required to wear protective toed boots at all times while performing work on a construction jobsite or in a shop environment. These boots must be made of a durable, cut-resistant material (i.e. leather, Kevlar, etc.), have a protective toe cover that meets the ASTM F2413-11 standard, mid- or high-cut ankles (6" or above), high grip soles to allow good tread, and they must be EH Rated (electrical hazard rated). Footwear such as athletic shoes, thick soled shoes, or open toed shoes/sandals are strictly prohibited.

All employees are required to wear gloves while performing tasks that could result in a hand abrasion, laceration, puncture, chemical burn, thermal burn, or the absorption of a hazardous substance through the skin (i.e. chemicals, sewage, etc.). The gloves worn while performing each task must provide adequate protection from the associated hazards. For example, "durable gloves" (i.e. leather, coated Kevlar/knit) should be worn when exposed to abrasions, lacerations, or puncture hazards. "Impervious gloves" (i.e. latex, nitrile, neoprene) should be worn when exposed to chemical burns or hazardous substances. "Heat resistant gloves" (i.e. cotton, Nomex, Kevlar) should be worn when exposed to thermal burns. The company will provide impervious and heat resistant gloves as necessary. Employees are responsible for providing their own durable gloves.

Reimbursement: The company will issue one (1) reimbursement up to \$140.00 once every twelve months to each full-time active employee for the purchase of protective toed boots and durable gloves. To receive reimbursement, each employee must complete the "Boot and Glove Reimbursement Form" and attach a copy of the sales receipt. The sales receipt must include the name of the vendor, date of the sale and also verify the cost of the boots and gloves that were purchased. Employees can expect to receive the reimbursement on their paycheck 2-3 weeks after they have submitted the paperwork, provided that all the correct information is included.

For questions about this reimbursement, contact the Payroll Department at 317.653.5363 or payroll.dept@millerpipeline.com. For questions about the boot and glove program, contact the Safety Administrator at 317.653.5290 or by email at safety.department@millerpipeline.com.



8850 Crawfordsville Road
Indianapolis, IN 46234
Phone: (317) 293-0398
Fax: (317) 693-9364

Prescription Safety Glasses Reimbursement Form

INSTRUCTIONS: Complete all of the information below; **please print.** Attach all sales receipt(s) to this form and send it to the corporate office, Attn: Safety Dept. For complete details, please refer to the bottom of this form.

Employee Name _____	
Address _____	
City _____	State _____ ZIP _____
Phone Number _____	Email _____
Store where glasses were purchased _____	
Date of sale _____	Total cost of glasses _____
By signing below, I am acknowledging that the information provided above is accurate and that I have read and agree to the terms and conditions of the Prescription Safety Glasses Reimbursement Policy.	
Employee Signature _____	Date _____

FOR OFFICE USE ONLY

Employee Number _____	Date Paid _____		
Gross Amount _____	G/L Number _____	Description _____	Prescription Safety Glasses

Scope: All sections of this policy are effective as of July 1, 2017 and apply to full-time, active employees who are required to wear protective eyewear.

Requirements: We expect all of our field employees to wear safety glasses any time they are on the job site, in a shop, or working in one of the laydown yards. Employees are encouraged to purchase their glasses through the Miller Pipeline designated Hoya Account, however, eyeglasses may be purchased through any valid vendor. All safety glasses must be marked with ANSI Z87.1 to be considered safety glasses.

Operators are required to wear safety glasses unless they are working in a cab that is fully enclosed. At times, operators may struggle with depth perception when wearing safety glasses. If this is a problem for the operator, he/she may remove them for the short period of time that depth perception is required. There have been instances where operators have been struck with debris that flew back into the cab. Safety glasses will eliminate this from happening.

Reimbursement: The company will issue one (1) reimbursement up to \$129.00 once every twelve months for the purchase of prescription safety glasses to each full-time, active employee. This reimbursement will appear on the employee's paycheck after approval by the Safety Department and Payroll Department. To receive reimbursement, each employee must complete the "Prescription Safety Glasses Reimbursement Form", attach the sales receipt, and attach a picture of the glasses with the ANSI Z87.1 markings. The sales receipt must include the name of the vendor, date of sale, and the cost of the glasses purchased. Employees can expect to receive the reimbursement on their paycheck 2-3 weeks after they have submitted the paperwork, provided that all the correct information is included.

For questions about this reimbursement, contact the Payroll Department at 317.863.6283 or payroll.dept@millerpipeline.com. For questions about the eyewear program, contact the Safety Administrator at 317.863.6280 or by email at safety.department@millerpipeline.com.



MILLER PIPELINE

AN **ARTERA** COMPANY

Health & Safety Program

FORMS SECTION

Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

You have indicated that you wish to voluntarily wear a respiratory protection device. The following information is required by OSHA to be supplied to employees who wish to use respiratory protection devices voluntarily. Please read this information and sign the form to indicate that you have received this information.

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 respirators 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.

I acknowledge that I have received a copy of the information for voluntary use of respirators when not required under the Standard Sec. 1910.134. I have discussed this document with my supervisor, will receive medical clearance prior to wearing a respirator beyond an N95 face piece, and am in compliance. I will receive a signed copy of this document from my supervisor for my record, as well as one will be in my medical file.

Employee Name: _____

Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Bloodborne Pathogens Vaccination Form

INTRODUCTION: By signing this document I am verifying that I understand I may be exposed to the bodily fluids of others due to the activities of my job, and therefore I am at risk of contracting an infectious disease. Miller Pipeline has recommended and offered to fully pay for the series of Hepatitis B vaccinations. It has been explained that by receiving these vaccinations my immune system may strengthen, but complete immunity to these diseases is not guaranteed. It has also been explained that these vaccinations do sometimes cause adverse effects. After considering the benefits and consequences that may be involved with these vaccinations, I have decided to proceed as follows (check the appropriate box below):

I HAVE ALREADY RECEIVED THE VACINATIONS.

I WOULD LIKE TO DECLINE THE VACCINATIONS.

By placing a check in the box above I am verifying that I would like to decline Miller Pipeline's recommendation to receive the vaccinations. I understand that by declining to receive these vaccinations, I remain at risk of contracting an infectious disease. It has also been explained that if I decide to receive these vaccinations in the future, I may still receive them at no cost.

I WOULD LIKE TO RECEIVE THE VACCINATIONS.

By placing a check in the box above I am verifying that I would like to receive the series of Hepatitis B vaccinations at no cost. I understand that the company's responsibility is limited to offering these vaccinations, issuing the name, address, and phone number of a facility that can administer them, and paying for all associated costs. I understand that it is my sole responsibility to schedule and attend all appointments.

Printed Name

City/State Where You Prefer to Receive Vaccinations

Phone Number

Signature

MILLER PIPELINE OFFICE USE ONLY

Facility Name

Phone Number

Street Address / City / State

DATE THIS INFORMATION WAS SENT TO THE EMPLOYEE

Confined Space Entry Permit

This permit is to be completed by an employee who has been trained and authorized to conduct confined space entry, and it must be authorized/cancelled by the Entry Supervisor.

GENERAL INFORMATION

SPACE TO ENTER:	
PURPOSE OF ENTRY:	
POTENTIAL HAZARDS:	
PROHIBITED CONDITIONS:	
RESCUE PLAN & INFO:	
OTHER PERMITS:	
START DATE/TIME:	
END DATE/TIME:	

AUTHORIZED PERSONS

<u>NAMES:</u>	<u>SUPERVISOR</u>	<u>ATTENDANT</u>	<u>ENTRANT</u>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>

HAZARD CONTROL

ISOLATION PROCEDURES: Lockout Tagout Blocking/Plugging Other: _____

AREA PROTECTION: Warning Signs Barrier Devices Danger Tape

VENTILATION: Continuous Intermittent Initial

ATMOSPHERIC MONITORING: Continuous Periodic (*Every 15-Minutes or More*)

SPECIAL TOOLING: Spark-Free Tools Intrinsically Safe Lighting Other: _____

COMMUNICATION: Voice Rope Tugs Radios

RESCUE DEVICE: Tripod, Winch & Harness Wristlets/Anklets Rescue Cart SCBA SKED

REQUIRED PPE

<input type="checkbox"/>	Hardhat / Bump Cap	<input type="checkbox"/>	Cut-Resistant Gloves	<input type="checkbox"/>	Tyvek Coveralls
<input type="checkbox"/>	Body Harness	<input type="checkbox"/>	Cut Resistant Sleeves	<input type="checkbox"/>	Barrier Cream
<input type="checkbox"/>	Hearing Protection	<input type="checkbox"/>	Rubber Boots	<input type="checkbox"/>	Supplied Air Respirator
<input type="checkbox"/>	Safety Glasses / Goggles	<input type="checkbox"/>	Rubber Gloves	<input type="checkbox"/>	SCBA Respirator

MONITORING EQUIPMENT

Manufacturer:	Model:	Date Last Calibrated:
----------------------	---------------	------------------------------

MONITORING RESULTS

PERMISSABLE ENTRY LEVELS Oxygen: 19.5-23.5% LEL: <10% CO: <35 ppm H ₂ S: <10 ppm Other: <PEL	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² ___ % LEL ___ % CO ___ ppm H ₂ S ___ ppm Other _____

PERMIT STATUS

AUTHORIZED BY: _____

DATE & TIME: ___/___/___, _____

CANCELLED BY: _____

DATE & TIME: ___/___/___, _____

Confined Space Entry Permit/Hot Work Permit

WEKO Division

This permit is to be completed by an employee who has successfully completed the Miller Pipeline Confined Space Training Program and authorized/cancelled by the Entry Supervisor. It is to be voided if conditions change or a new hazard is detected during entry.

GENERAL INFORMATION

TYPE OF SPACE: Sewer Pipe Water Pipe Gas Pipe Other: _____
ADDRESS OF SPACE: _____ **City:** _____ **State:** _____
PURPOSE OF ENTRY: Lining Pipe Joint Sealing Manhole Rehab Other: _____
START DATE & TIME: ___/___/___, ___ am/pm **EXPIRATION DATE & TIME:** ___/___/___, ___ am/pm
RESCUE/EMERGENCY NUMBER: 911 Other: _____
ADDRESS OF CLOSEST HOSPITAL: _____ **City:** _____ **State:** _____

AUTHORIZED PERSONNEL

NAMES	ATTENDANT	ENFRANT	BOTH
ENTRY SUPERVISOR: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HAZARD CONTROL

TRAFFIC CONTROL: Warning Signs Cones Barricades Arrow Boards Flagmen Police
ENERGY CONTROL: Cut & Cap Line Plug Line Reroute Line Lock/Block Valves Purge Gases Flush Liquids/Solids Latch/Block Moving Parts Check/Remove Dangerous Animals
 Other: _____ Other: _____
VENTILATION: Intermittent Continuous Natural
ATMOSPHERIC TESTING: Initial Intermittent Continuous
RETRIEVAL SYSTEM: Miller Intruder System (w/rope & winch) Tripod System (w/rope & winch) Rescue Rope
LADDER SYSTEM: Manhole Cleats Single Rung Ladder Other: _____
COMMUNICATION: Voice Rope Tugs Radios Squawk Box
SPECIAL TOOLING: Spark-Free Tools Intrinsically Safe Lighting Other: _____

HOT WORK PERMITTING

The three elements necessary for combustion are fuel, oxygen, and an ignition source. Miller Pipeline only permits work that knowingly produces ignition sources (i.e. hot work) to be performed in a confined space if all the following criteria are met:

- Continuous Ventilation Continuous Monitoring Atmosphere < 10% LEL
 Fire Watch Assigned Fire Extinguisher at Entrance * **HOT WORK PERMITTED:** YES NO

MONITORING EQUIPMENT

<input type="checkbox"/> Solaris	Unit # / Serial #	Date Last Calibrated:
<input type="checkbox"/> Altair	Unit # / Serial #	Date Last Calibrated:
<input type="checkbox"/> Other _____	Unit # / Serial #	Date Last Calibrated:

MONITORING RESULTS

<p>PERMISSIBLE ENTRY LEVELS</p> <p>Oxygen: 19.5-23.5% LEL: <10% CO: <35 ppm H₂S: <10 ppm Other: <PEL</p>	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____
	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____	Date: ___/___/___ Time: ___ am/pm O ² _____ % LEL _____ % CO _____ ppm H ₂ S _____ ppm Other _____

AUTHORIZATION

PREPARED BY: _____ DATE: _____

CANCELLED BY: _____ DATE & TIME: ___/___/___, ___ am/pm

Crane & Rigging Annual Inspection Report

Equipment Manufacturer:	Equipment Model:	Equipment Number:
Hour Meter Reading:	Inspector Name:	Inspection Date:

CARRIER ITEMS

Parts to Inspect	OK	Needs Repair	N/A	Repair Notes
(Inside) Parking Brake	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Oil Pressure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Air Pressure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Low Air Warning Device	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Telltale Lights & Buzzers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Horn	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Windshield Wiper	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Heater & Defroster	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mirrors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Steering Wheel (excess play)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All light switches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All glass	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Fire Extinguisher	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Flags	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Torches or Reflectors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Fuses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Outside) Headlights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Clearance Lights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Turn Signals/4 Way Flashers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Windshield Wiper Blades	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Lugs, Tires & Wheels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Fuel Tank & Cap	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outriggers Controls & Locks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Tail & Stop Lights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Side Marker Lights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Radiator	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Thermostat & Hoses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Drive Belts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Air Compressor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Air Governor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Air Tanks & Lines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Muffler	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Exhaust & Tail Pipes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Clutch	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Transmission	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Transfer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Drive Shaft & U-Joints	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

CARRIER ITEMS

Parts to Inspect	OK	Needs Repair	N/A	Repair Notes
Differential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Front Axle	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Intermediate Axle	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Rear Axle	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Master Cylinder	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Air Hydraulic System	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Inside) Parking Brake	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Oil Pressure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Air Pressure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Low Air Warning Device	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Telltale Lights & Buzzers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Horn	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Wheel Cylinder	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Steering Gear & Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Springs & Shackles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Shock Absorbers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

SUPER STRUCTURE ITEMS

Parts to Inspect	OK	Needs Repair	N/A	Repair Notes
All Control Mechanisms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Swing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Load Rating Charts & Decals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Hoists	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Boom Hoist Lock or Paul	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Telescope Boom	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Auxiliary Winch	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Main Winch	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Brakes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Limit Switches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Locking Devices	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Oil Pressure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Accumulator Systems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Automatic Lubricating Systems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Flood Lights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Boom Angle Indicator	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Load Indicating Device	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Signal Horn	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Glass	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Windshield Wiper	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outrigger Controls & Locks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Remote Control, Carrier	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Heater & Defroster	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Air Cleaner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Friction Clutches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Friction Clutch Linkage & Pins	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

SUPER STRUCTURE ITEMS

Parts to Inspect	OK	Needs Repair	N/A	Repair Notes
Belts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Hoses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Hydraulic Fluid	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Batteries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Wire Rope	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sheaves, Guards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Blocks & Hooks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Boom	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Jib Back Stops	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Drive Line	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Gear Box	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Lights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Hook Rollers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overhead Cleanliness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Muffler/Exhaust System	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Automatic Boom Kickout	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Nuts/Bolts/Rivets (Loose, Missing)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Cable Spooling Property	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Complete Gantry System	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Wedge Sockets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Machinery Guards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Counterweight Hooks & Bolts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Hand Railings & Cat Walks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pillow Block Bearing Bolts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

CRAWLER ITEMS

Parts to Inspect	OK	Needs Repair	N/A	Repair Notes
Crawler Pads & Pins	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Track Roller & Idlers (rotate freely)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Track Tension Adjustments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Traction Brakes or Backing Panels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Steering Brakes/Locks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Loose or Missing Bolts and Rivets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Crane Circle Gear (cracked teeth, loose or missing mounting bolts)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Drive Sprockets or Chains	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Crane & Rigging Daily Inspection Report

Equipment Manufacturer:	Equipment Model:	Equipment Number:
Hour Meter Reading:	Inspector Name:	Inspection Date:

(✓) okay (X) needs repair

MON TUE WED THU FRI SAT SUN

	MON	TUE	WED	THU	FRI	SAT	SUN
Windows <small>(no cracks or defects)</small>							
Equipment Structure <small>(no dents, cracks, bends, or broken welds)</small>							
Anti-Two Block, Hoist Limiter, Guards & Seat Belt <small>(in-place & operating properly)</small>							
Operator Manual & Load Chart <small>(located on equipment & legible)</small>							
Fire Extinguisher <small>(mounted, unobstructed, charged & inspected)</small>							
Stickers, Lights & Horns <small>(in-place & operating properly)</small>							
Load, Level & Angle Indicators <small>(functioning accurately)</small>							
Controls <small>(operating properly & smoothly)</small>							
Power & Break System <small>(reliable performance)</small>							
Outriggers <small>(good conditions & functional locking devices)</small>							
Lubrication <small>(proper fluid levels & moving parts operate smoothly)</small>							
Electrical Apparatus <small>(well insulated wiring, tight connects, & clean controls)</small>							
Pneumatic & Hydraulic Parts <small>(no deterioration or leakage)</small>							
Pins, Bearings, Shafts, Rollers, Gears & Clamps <small>(no distortion, cracks, or excessive wear)</small>							
Bolts & Rivets <small>(in-place and tight)</small>							
Sheaves & Drums <small>(no excessive wear or cracks)</small>							
Rigging – Wire Ropes, Slings, etc. <small>(not worn, twisted, stretched, kinked, or broken)</small>							
Hooks <small>(not cracked, twists, bends, & safety clips in -place)</small>							

All items marked with an (X) must be explained in the section below.

Emergency Response Checklist

INSTRUCTIONS: Upon experiencing an emergency situation on a jobsite, the Foreman is to pull this form out of the “Incident Packet” and begin using it as a guideline to assure they are properly managing the situation. Once the Superintendent arrives, they should collect this form to continue using until all issues have been dealt with and the situation is under control.

FOREMAN RESPONSE:

1) PROTECT LIFE & PROPERTY.

- Stop all job activities immediately.
- Take any necessary steps to prevent additional injuries.
- Call 911 now if life-threatening injury has occurred.
- Issue medical treatment to any seriously injured employees.
- Take necessary steps to prevent additional property damage.

2) SECURE & ISOLATE THE AREA.

- Turn off all equipment.
- Remove all individuals from the incident area (e.g. residents, pedestrians, other company employees, etc.).
- Assign crew members to use cones, barrels, fence, warning tape or other devices to establish a boundary around the incident area.
- Assign other crew members to control traffic if necessary and to restrict access in/out of the area.

3) NOTIFY NECESSARY PERSONS.

**** BEGIN DOCUMENTING ALL CONVERSATIONS & ACTIVITIES ****

- Call 911 (if not already done so).
 - Ensure the customer is notified of the situation.
 - Notify your Superintendent of the situation.
- (Keep conversations factual and short, because you still have many things to handle before they arrive.)

4) WAIT FOR REPRESENTATIVES.

- Wait for 911 emergency responders, a customer representative and your Superintendent to arrive at the scene.
- While you are waiting:
 - Double check to make sure the area is adequately secured.
 - Check the area for any undiscovered hazards (i.e. gas leaks, ignition sources, electrical power exposure, etc.).
 - Make certain all crew members are accounted for.
 - Assign crew members to move company vehicles out of the area, only if it will not create a hazard and they're not evidence.
 - Assign crew members to watch for 911 emergency responders and guide them into the incident area.
 - Remind all employees onsite that they are not to give ANY response to media questions if asked.

5) ASSIST WITH THE SITUATION.

- Allow the 911 emergency responders to take control of the situation when they arrive and begin taking instruction from them.
- As the customer representative and your Superintendent arrive, give them as many details as possible.
- Give this checklist to your Superintendent when they arrive.

SUPERINTENDENT RESPONSE:

1) GATHER DETAILS.

- Ensure the crew is protecting immediately life and health.
- Make sure you clearly understand the details of the incident.
- Get directions and begin driving to the scene, or assign a replacement if you won't arrive within 30-minutes.

2) NOTIFY NECESSARY PERSONS.

- Notify the Regional VP/Manager.
- Notify the Corporate Compliance Director to identify DOT requirements for substance abuse testing.
- Notify the Corporate Risk Manager.
- Notify the Corporate Communication Director (if the media is involved).

3) ARRIVE, MEET & ASSIST.

- Take this checklist from the Foreman and begin completing.
- Meet with the 911 responder, customer representative and Foreman to gather details and develop a plan for resolving the situation.

4) ACCOMMODATE FAMILY MEMBERS.

- Contact immediate family members of any employee who has a life-threatening injury and give them the name/address of the facility they will be receiving treatment at.
- If family members arrive at the jobsite:
 - Immediately and privately meet with them to identify yourself as the one who is supervising the scene.
 - Inform them of all known facts.
 - Request that all media communication be channeled through our company representative designated to handle the media.

5) INVESTIGATE THE INCIDENT.

- Complete the appropriate form.
- Document interviews with all employees and witnesses.
- Make drawings of the area.
- Take pictures/video of the area, damage and measurements.
- Forward all gathered information to the Corporate Risk Manager within 24-hours.
- Participate in the Root Cause Investigation process.

Excavation Inspection Log

<i>Competent Person:</i>	<i>Date:</i>	<i>Time:</i>
<i>Location:</i>	<i>Depth:</i>	<i>Soil Class:</i> <input type="checkbox"/> B <input type="checkbox"/> C

BEFORE DIGGING

- | | <u>YES</u> | <u>NO</u> | <u>NA</u> |
|---|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> Are <u>overhead power lines covered, moved or de-energized</u> if within 10'? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are nearby <u>unstable objects secured</u> (telephone poles, street lights, etc.)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are all underground <u>utilities marked</u> and are the marks current? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

WHILE DIGGING

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> Are live <u>utilities being hand dug</u> around to prevent scraping or prying against? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are <u>employees away from heavy equipment</u> and not riding or directly under buckets? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Is <u>heavy equipment back from edge</u> of occupied excavations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Is <u>undermining avoided</u> under buildings, sidewalks, streets and other structures? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Is <u>spoil pile at least 2 feet</u> from the edge of excavation in areas to be occupied? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

AFTER DIGGING

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> Is excess <u>water removed</u> from excavations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Is <u>ventilation and monitoring equipment used</u> if the soil has signs of contamination? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are all <u>loose objects back from edge</u> of excavations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Is a <u>ladder, ramp or steps placed</u> every 25 feet in excavations over 4 feet deep? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Is a <u>temporary walkway or bridge placed</u> over frequently crossed areas? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are all open <u>excavations coned-off or barricaded</u> when the jobsite is unattended? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

PROTECTIVE SYSTEMS

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> Are excavations <u>sloped or benched at proper angle/ratio</u> (e.g. B Soil = 45° Angle / C Soil = 33° Angle)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are <u>trench boxes installed properly</u> (e.g. ends of trench protected, backfilled at least half way, top of boxes 18 inches above grade, pins in place, etc.)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are <u>shoring systems installed properly</u> (e.g. correct horizontal and vertical spacing, boards used as needed, shores placed vertically and not horizontal, etc.)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Are all components of <u>protective systems in good condition</u> (i.e. no bent, dented, punctured, rusty or leaking parts)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Have conditions changed that would require the <u>soil to be reclassified</u> (e.g. rain, freezing/thawing, wind storm, vibration, cracks, undermining, bulge in sidewall, etc.)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Damage Prevention Institute (DPI) Standard Required for all Subcontractors Performing Excavation

Miller Pipeline is a DPI accredited organization. In keeping with the requirements of maintaining a DPI accreditation, and to advance damage prevention on jobs in which Miller Pipeline has decision-making authority, Miller Pipeline requires its subcontractors to also be DPI accredited when conducting any work that involves excavation (as defined below) within the states of:

- | | | |
|-------------------------|-----------------|--------------------|
| 1. Alabama | 9. Kansas | 17. New York |
| 2. Arkansas | 10. Kentucky | 18. North Carolina |
| 3. California | 11. Louisiana | 19. Ohio |
| 4. Colorado | 12. Maryland | 20. Pennsylvania |
| 5. District of Columbia | 13. Michigan | 21. South Carolina |
| 6. Florida | 14. Mississippi | 22. Tennessee |
| 7. Illinois | 15. Missouri | 23. Virginia |
| 8. Indiana | 16. New Jersey | 24. Wisconsin |

Excavation Definition

For purposes of this policy, the term “excavation” is defined as a ground disturbance activity that goes below ground, regardless of the tool used, and includes any operation in which earth, rock or other material in the ground is moved, removed, or is otherwise displaced by means of tools, equipment, or explosives. This includes typical items such as backhoe, trackhoe, trenching, digging, drilling, directional drilling, auguring, boring, hydrovac, etc.; as well as items which are less typically defined as “excavation,” including grading, tunneling, scraping, cable or pipe plowing and driving, foundation work, fencing, pole-setting, vegetation and tree management, plumbing, sewer and drainage work, geologist and environmental, etc.

Damage Prevention Institute (DPI) Requirement

Within the state listed above, it is Miller Pipeline’s policy to require DPI Accreditation when hiring a subcontractor whose scope of work will include any excavation (as defined above). Miller Pipeline will not consider an excavation bid from a subcontractor not DPI Accredited unless it is the sole bid. Subcontractors may submit a bid without DPI Accreditation, but bids without DPI Accreditation will not be considered when there is at least one DPI Accredited bidder.

The intent of this policy is to require DPI accreditation when Miller Pipeline has decision-making authority over which subcontractor to use, while at the same time provide for exceptions in situations where Miller Pipeline does not have options. Example exceptions are as follows:

- *Highly-Specialized Work*: the work being subcontracted is highly specialized and there is only one company able to perform the work, and that company refuses to bid after having been notified that DPI Accreditation is a requirement
- *Customer-Required Subcontractor List*: Miller Pipeline is required to subcontract from a list of companies that has been provided by the end customer, and Miller Pipeline has no ability to add additional bid requirements to such companies
- *Remote Locations*: the work being subcontracted is being done in a remote location in which there is only one company able to perform the work in that location, and the company refuses to bid after having been notified that DPI Accreditation is a requirement

The above exceptions are guidelines and not hard-and-fast rules for not requiring DPI Accreditation from Miller Pipeline subcontractors. The overriding principle is to require DPI Accreditation from Miller Pipeline subcontractors.

Process When Using a Non-DPI Accredited Contractor

If a subcontractor is to be used that is not DPI Accredited, approval of that exception must be made in writing by the Regional VP of Operations. Requests for exceptions should be accompanied by documentation of Miller Pipeline notification to the subcontractor of the DPI Accreditation requirement.

If there are any questions on this policy, or whether an exception approval should be sought, please contact:

Jeremy Wyatt, Vice President HSE, Training and Compliance
317.653.5281 (office) or 732.289.1048 (cell) or Jeremy.Wyatt@millerpipeline.com

Rev. 10/7/2025

Hot Work Permit

APPLICATION: All employees must complete this section of the form and give it to their supervisor for authorization before conducting any “hot work”.

Employee performing work:	Type of “hot work” to be done:	Location of work:
Date of proposed work:	Proposed start time:	Estimated end time:
Details of work to be done:		

AUTHORIZATION: Supervisors must review the information listed above, inspect the work area for each item listed below, and then sign the permit in order to authorize the proposed hot work.

- All flammable/combustible materials have been moved 35’ away or barriers have been installed.
- Measures have been taken to prevent the underlying surface from igniting.
- A “fire watch” has been assigned and will stand by with a fully charged fire extinguisher.
- Hot work equipment is safe to use (i.e. anti-flashback arrestors are on torches, lead cables are not damaged, cylinders are secured upright, gauges are fully functional, etc).
- Precautions have been taken to prevent the contents of containers or pipes from igniting or resulting in over-exposure to a hazardous chemical.

Supervisor Signature

Date

EXECUTION: Once authorization is granted by a supervisor to proceed with hot work, the employee performing the work must post this permit in the work area, fill-in the following information, and forward a completed copy to the Safety Director.

Satisfaction of posting requirement: <input type="checkbox"/> POSTED <input type="checkbox"/> NOT POSTED	Actual time the work was completed:
Detail of any incidents that occurred:	

Incident Investigation Report

Miller Pipeline		<input type="checkbox"/> Injury / Illness	<input type="checkbox"/> Quality Incident
		<input type="checkbox"/> Vehicle Accident	<input type="checkbox"/> Property Damage
		<input type="checkbox"/> Utility Damage	<input type="checkbox"/> Near Miss
Region:		Date of Incident:	Time of Incident:
Incident Location:	Street:	City:	State:
Employee Name		Employee Title:	Employee Most Recent Hire Date:
Foreman:		Supervisor:	Customer:
Subcontractor involved? If yes, name and contact information:			
Incident Description:			
Injury / Illness Information (If no injury / illness, skip this section)			
Nature of Injury / Illness:			
<input type="checkbox"/> Amputation	<input type="checkbox"/> Dislocation	<input type="checkbox"/> Internal	<input type="checkbox"/> Puncture
<input type="checkbox"/> Bruise / Contusion	<input type="checkbox"/> Foreign Body	<input type="checkbox"/> Loss of Consciousness	<input type="checkbox"/> Scratch / Abrasion
<input type="checkbox"/> Burn / Scald	<input type="checkbox"/> Fracture	<input type="checkbox"/> Muscle Tear	<input type="checkbox"/> Strain / Sprain
<input type="checkbox"/> Cut / Laceration	<input type="checkbox"/> Heat Related	<input type="checkbox"/> Poison/Allergic Reaction	<input type="checkbox"/> Other (specify below)
Treatment:		Body Part(s) Injured:	Description of Other:
<input type="checkbox"/> Record Only <input type="checkbox"/> First Aid <input type="checkbox"/> Medical Treatment			
Treatment Remarks:		Treatment Facility:	
Witness Name:		Witness Statement Attached?	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Incident Description:			

Vehicle Accident Information (If no vehicle accident, skip this section)			
CDL required? <input type="checkbox"/> Yes <input type="checkbox"/> No	Medical card required? <input type="checkbox"/> Yes <input type="checkbox"/> No	Vehicle Type: Click or tap here to enter text.	Pulling Trailer? <input type="checkbox"/> Yes <input type="checkbox"/> No
License expired? <input type="checkbox"/> Yes <input type="checkbox"/> No	Medical card expired? <input type="checkbox"/> Yes <input type="checkbox"/> No	Vehicle Number: Click or tap here to enter text.	Trailer Number: Click or tap here to enter text.
Type of area where accident occurred: Choose an item.	Speed At Impact: Click or tap here to enter text.	Was vehicle rented by Miller? <input type="checkbox"/> Yes <input type="checkbox"/> No	How many vehicle(s) involved including Miller? Click or tap here to enter text.
Smith System online training date: Click or tap to enter a date.	DOT Certification Road Test Date: Click or tap to enter a date.	DOT Road Test Evaluator Name: Click or tap here to enter text.	DOT Road Test Vehicle Type: Click or tap here to enter text.
Please attach a copy of photos and accident sketch: <input type="checkbox"/> Attached			
Vehicle Incident Type:			
<input type="checkbox"/> Collision Occurred on Company Property <input type="checkbox"/> Collision While Backing <input type="checkbox"/> Collision While Being Passed <input type="checkbox"/> Collision While Employee Vehicle Making U-Turn <input type="checkbox"/> Collision while Employee vehicle Rolling Backwards in Preparation to Start Forward <input type="checkbox"/> Collision While Passing <input type="checkbox"/> Collision While Third Party Vehicle Making U-Turn <input type="checkbox"/> Collision with Pedestrian <input type="checkbox"/> Collision with Stationary Object	<input type="checkbox"/> Employee Driver Made Sudden Stop <input type="checkbox"/> Employee Vehicle Pulling Away From Curb <input type="checkbox"/> Employee Vehicle Rear End Third Party <input type="checkbox"/> Employee Vehicle Skid (loss of traction) for Any Reason <input type="checkbox"/> Employee Vehicle Struck by 3rd Party <input type="checkbox"/> Employee Vehicle Struck While Properly Parked <input type="checkbox"/> Employee Vehicle Weaving <input type="checkbox"/> Head-On Collision	<input type="checkbox"/> Intersection Collision: Employee Vehicle NOT Turning <input type="checkbox"/> Intersection Collision: Employee Vehicle Turning LEFT <input type="checkbox"/> Intersection Collision: Employee Vehicle Turning RIGHT <input type="checkbox"/> Non-Intersection Collision while Turning Vehicle <input type="checkbox"/> Side Swipe Collision <input type="checkbox"/> Third Party Vehicle Pulling Away From Curb <input type="checkbox"/> Vehicle Overturning on Roadway <input type="checkbox"/> Vehicle Run Off Roadway	
Incident Description: Click or tap here to enter text.			

Utility Damage Information (If no utility damage, skip this section)		
Cause of Damage: <input type="checkbox"/> Backhoe/Trackhoe <input type="checkbox"/> Hand Tool (identify in description) <input type="checkbox"/> Directional Drill <input type="checkbox"/> Pneumatic Hole Hog/Gopher <input type="checkbox"/> Other (write in below)	Type of Utility: <input type="checkbox"/> Gas – Main <input type="checkbox"/> Gas – Service <input type="checkbox"/> Electric <input type="checkbox"/> Sewer <input type="checkbox"/> Water <input type="checkbox"/> Fiber-optic <input type="checkbox"/> Other (write in below)	One Call Ticket Number and Dig Dates (skip if attaching copies tickets): Was Utility Accurately marked: <input type="checkbox"/> Yes <input type="checkbox"/> No
Description of Other: Click or tap here to enter text.		Was Utility Hand Spotted: <input type="checkbox"/> Yes <input type="checkbox"/> No
Has the employee(s) involved in the damage completed GSS training; if so when? Click or tap here to enter text.		
Please attach a copy of the one-call ticket, utility damage report, damage ticket number and all photos of the damage and scene. <input type="checkbox"/>		
Attached		
Incident Description: Click or tap here to enter text.		
Quality Incident Information (If no quality incident, skip this section)		
Type of Incident: <input type="checkbox"/> Failed Pressure Test <input type="checkbox"/> Bad Locate/Missed Locate <input type="checkbox"/> Leak Reported <input type="checkbox"/> Fusion Failure-In Process <input type="checkbox"/> Material Failure Pre-installation <input type="checkbox"/> Material Failure Post-Installation <input type="checkbox"/> Other (write in below)	Was the person OQ Qualified for the task: <input type="checkbox"/> Yes <input type="checkbox"/> No	
	Was the task covered during the daily huddle or JSA? <input type="checkbox"/> Yes <input type="checkbox"/> No	
	Please attach a copy of the daily huddle/JSA <input type="checkbox"/> Attached	
	Please complete QIR form and attach any photos from the scene <input type="checkbox"/> Completed and Attached	
Description of Other: Click or tap here to enter text.		
Incident Description: Click or tap here to enter text.		
Property Damage (If no property damage, skip this section)		
Incident Description: Click or tap here to enter text.		
Near Miss Incident (If no near miss, skip this section)		
Incident Description: Click or tap here to enter text.		

Daily Huddle/Job Safety Analysis (JSA) Review

Was there a Daily Huddle/JSA that applies to the task being performed when the incident occurred?

Yes No

If yes, answer the following questions and attach a copy to this report.

Attached

If no, answer the following questions and explain what was missing.

Were the hazards sufficiently identified? If not, please explain.

Yes No Explain:

Were identified controls adequate and implemented? If not, please explain.

Yes No Explain:

Vehicle Identification And Evaluation Of Causal Factors

Select all that apply by filling in the appropriate boxes.

Physical Factors	Human Factors	Smith System 5 Keys
<input type="checkbox"/> Faulty Brakes	<input type="checkbox"/> Attention Distracted	<input type="checkbox"/> Did not Aim High in Steering
<input type="checkbox"/> Unlocked Bins	<input type="checkbox"/> Cell Phone Use	<input type="checkbox"/> Did not Get the Big Picture
<input type="checkbox"/> Unsecured Loads	<input type="checkbox"/> Excessive Physical Demands	<input type="checkbox"/> Did not Keep Eyes Moving
Environmental Factors	<input type="checkbox"/> Excessive Speed	<input type="checkbox"/> Did not Leave Him/Herself an Out
<input type="checkbox"/> Adverse Weather Conditions	<input type="checkbox"/> Fatigued / Sick	<input type="checkbox"/> Did not Make Sure Others Saw Them
<input type="checkbox"/> Poor Visibility	<input type="checkbox"/> Hazards Not Recognized	
<input type="checkbox"/> Road Hazard	<input type="checkbox"/> Inexperienced / Not Trained	
Management Systems	<input type="checkbox"/> Shortcuts / Hasty	
<input type="checkbox"/> Employee Not Trained on Operation of Vehicle		

Identification And Evaluation Of Causal Factors

Select all that apply by filling in the appropriate boxes.

Physical Factors	Environmental Factors	Operator Issues
<input type="checkbox"/> Equipment Failure	<input type="checkbox"/> Adverse Weather Conditions	<input type="checkbox"/> Abandoned facility
<input type="checkbox"/> Body Position	<input type="checkbox"/> Animal, Insect, Poisonous Plants	<input type="checkbox"/> Deteriorated Facility
<input type="checkbox"/> Housekeeping	<input type="checkbox"/> Chemical Exposure	<input type="checkbox"/> Facility could not be found / located
<input type="checkbox"/> Improper Storage	<input type="checkbox"/> Temperature (Hot/Cold)	<input type="checkbox"/> Facility marking or location not sufficient
<input type="checkbox"/> Inadequate Room to Maneuver		<input type="checkbox"/> Facility was not located or marked
<input type="checkbox"/> Improper Lifting / No Team Lift	Management Systems	<input type="checkbox"/> Incorrect facility records / maps
<input type="checkbox"/> Inadequate Lighting	<input type="checkbox"/> Change of Personnel or Job Handoff	<input type="checkbox"/> Previous damage
<input type="checkbox"/> Maintenance or Calibration	<input type="checkbox"/> Communication Breakdown or Lack Of	
<input type="checkbox"/> Obstructed View	<input type="checkbox"/> Daily Huddle / JSA Not Performed or Inadequate	Excavator Issues
<input type="checkbox"/> Visibility	<input type="checkbox"/> Improper / Inadequate Tools or Materials	<input type="checkbox"/> Failure to maintain clearances while using power equipment
	<input type="checkbox"/> Inadequate Training	<input type="checkbox"/> Failure to maintain marks
Human Factors	<input type="checkbox"/> Insufficient Time or Manpower	<input type="checkbox"/> Failure to support exposed facilities
<input type="checkbox"/> Body Position / Line-of-fire	<input type="checkbox"/> Monitoring or Evaluation of Worker	<input type="checkbox"/> Failure to use hand tools
<input type="checkbox"/> Fatigued / Sick	<input type="checkbox"/> No Rule or Procedure Exists	<input type="checkbox"/> Failure to verify facility by test hole
<input type="checkbox"/> Hazards Not Recognized	<input type="checkbox"/> Procedure / Instructions Enforcement (Span of Control)	<input type="checkbox"/> Improper backfilling
<input type="checkbox"/> Impairment from Medication or Other Substance	<input type="checkbox"/> Rule or Procedure: Inaccurate, Unclear or Out-of-Date	<input type="checkbox"/> No notification made to the One-Call Center
<input type="checkbox"/> Inappropriate Clothing or Footwear	<input type="checkbox"/> Working Alone	<input type="checkbox"/> Notification to the One-Call Center made but not sufficient
<input type="checkbox"/> Personal / Emotional Issues		<input type="checkbox"/> Wrong Information provided
<input type="checkbox"/> PPE Not Worn, Wrong Type, Not Available		
<input type="checkbox"/> Procedure / Instructions Understanding		
<input type="checkbox"/> Shortcuts / Hasty		
<input type="checkbox"/> Tools Not Provided		
<input type="checkbox"/> Training / Instructions / Procedure / Experience (explain in Causal Factor Results)		
<input type="checkbox"/> Other (type below)		

Causal Factors and Investigation Results

Explanation of Causal Factors (Explain each in detail)

Click or tap here to enter text.

Root Cause Analysis – Select Root Cause of this Investigation

- | | |
|--|--|
| <input type="checkbox"/> Lack of Skill or Knowledge

<input type="checkbox"/> Lack of Procedure or Work Standards
<input type="checkbox"/> Not Following Procedures or Directions
<input type="checkbox"/> Inadequate Communication of Procedures
<input type="checkbox"/> Hurrying/Rushing (please describe below the reason for the employee(s) to be in a hurry or rushed state, where was the pressure coming from) | <input type="checkbox"/> Improper or Inadequate Tools or Equipment
<input type="checkbox"/> Short Cuts Were Taken
<input type="checkbox"/> Engineering or Design Deficiency
<input type="checkbox"/> Uncontrollable (External Factor) Use rarely!
<input type="checkbox"/> Other (explain below) |
|--|--|

Root Cause Explanation (Enter Below):

Root Cause Extent of Condition (Read Questions and Enter Below):

Do we believe this problem is widespread; what were the potential outcomes of this situation, and do the applied corrective measures address the perceived extent of this condition?

Corrective Measures Tracking

List actions that have or will take place to prevent a recurrence	Assigned to whom	Target Completion date

Additional Findings

Items found that need to be corrected but did not affect the event	Follow up Action	Assigned to whom

Investigation Team

Name	Title	Department

Job Briefing & Hazard Assessment

Additional job briefings SHALL be held if significant changes, which might affect the safety of the employees, occur during the course of work.

811 MISS DIG #: _____

Exp. Date: _____ / _____

Site Address with city & state	
Visual Landmarks & EMS #	
Nearest Hospital	
Person Conducting Briefing: <input style="width: 150px;" type="text"/>	Job #: <input style="width: 100px;" type="text"/>
Crew Work Assignment: <input style="width: 150px;" type="text"/>	Date/Time: <input style="width: 150px;" type="text"/>
Cell phone coverage? Yes <input type="checkbox"/> No <input type="checkbox"/> <small>If not, have emergency actions been discussed?</small> Yes <input type="checkbox"/> No <input type="checkbox"/>	

Work Procedures <small>(Discuss the who, what, when, where, how and why of the job)</small>	OK	N/A
A walk of the site has been completed and all hazards and risks have been identified, eliminated and/or communicated to all individuals on site, including visitors.	<input type="radio"/>	<input type="radio"/>
Today's assignment and responsibilities are planned and understood by all individuals on site.	<input type="radio"/>	<input type="radio"/>
Emergency gas leak – wind direction has been identified: _____	<input type="radio"/>	<input type="radio"/>
Fire extinguisher has been placed upwind.	<input type="radio"/>	<input type="radio"/>
Excavation safety requirements have been met or exceeded.	<input type="radio"/>	<input type="radio"/>
All vehicles, equipment, hoses, cords and tools have been inspected and are in good condition.	<input type="radio"/>	<input type="radio"/>
Appropriate traffic control is in place that meets or exceeds traffic control standards. (*MUTCD)	<input type="radio"/>	<input type="radio"/>
The Smith Driving System was discussed today.	<input type="radio"/>	<input type="radio"/>
All sub-contractors / trades impacting this job have participated in this pre-job briefing.	<input type="radio"/>	<input type="radio"/>
<small>*Manual on Uniform Traffic Control Devices (MUTCD)</small>		



Energy source controls <small>(Discuss protections against uncontrolled energy release – back feeds, grounding, pressurized lines, etc.)</small>	OK	N/A
All ignition sources have been made safe. Protection against uncontrolled release of gas or air.	<input type="radio"/>	<input type="radio"/>
All underground/overhead utilities have been located/identified. Marks have been maintained.	<input type="radio"/>	<input type="radio"/>
Protection against moving equipment and vehicles. (i.e. excavator swing zone radius)	<input type="radio"/>	<input type="radio"/>

PPE requirements <small>(Discuss the general requirements for PPE on the job and/or in the environment)</small>	Check all necessary PPE for the task:
<input type="radio"/> Hardhat <input type="radio"/> Safety Glasses <input type="radio"/> Gloves <input type="radio"/> Hearing Protection <input type="radio"/> Safety Vest <input type="radio"/> FR or ARC Rated Clothing	
<input type="radio"/> Proper Footwear <input type="radio"/> SCBA/Respirator <input type="radio"/> Other PPE: <input style="width: 150px;" type="text"/>	

Special precautions <small>(Discuss any additional precautions that are essential to understand prior to starting the job)</small>	OK	N/A
Housekeeping – Slip / Trip / Fall hazards have been identified and made safe.	<input type="radio"/>	<input type="radio"/>
Vehicles are parked to provide crew protection or parked in a safe location away from fixed objects. Cones, caution tape and/or barricades in place to indicate work area.	<input type="radio"/>	<input type="radio"/>
Personal impacts (Fatigue, distractions, etc.) have been addressed and communicated. Strain prevention / Body position planned / Stretching completed	<input type="radio"/>	<input type="radio"/>
Importance of teamwork communicated.	<input type="radio"/>	<input type="radio"/>
Are erosion control measures in place?	<input type="radio"/>	<input type="radio"/>
Environmental impacts (weather, temp, insects, etc.) have been addressed and communicated. Prior to digging within 5' of a utility pole, the local utility company has been contacted.	<input type="radio"/>	<input type="radio"/>
All equipment requiring calibration or inspection is up to date. (O2 monitors have been zeroed, fresh air or bump tested)	<input type="radio"/>	<input type="radio"/>
Identified dog/s or signs of dog/s present and work site has been made safe.	<input type="radio"/>	<input type="radio"/>

Safety First and Foremost

OQ Requirement Verifications	Y	N
Does the work being performed require Operator Qualifications?	<input type="radio"/>	<input type="radio"/>
Has a review with the crew members taken place for them to be able to recognize, and know how to react to, any Abnormal Operating Conditions (AOCs)?	<input type="radio"/>	<input type="radio"/>
Is each crew member's OQ card/record on the job site? Was everyone's OQ card/record checked to verify each person performing a job holds the qualifications to do so, and qualification is valid?	<input type="radio"/>	<input type="radio"/>
Does the crew understand Span of Control (SOC) and identified who and what tasks need to be completed under SOC?	<input type="radio"/>	<input type="radio"/>

Job Hazard Analysis <small>(Critical steps, worst case scenarios & steps most likely to cause a problem and how they will be made safe)</small>		
Critical Steps	Identified Hazards/Potential Risks	Preventive Measures
		

List of Crew Members <small>(A copy of this form must be kept on site at all times)</small>				
Job Role	Printed Name	Employee ID #	Printed Name	Employee ID #
Lead <small>(Employee leading discussion and filling out form)</small>				
Crew Member				
Crew Member				
Crew Member				
Crew Member				

Job Site Visitors				
Job Role	Printed Name	Employee ID #	Printed Name	Employee ID #

Production goals	How did we do today?
# of services: _____	# of services: _____
Size and feet of main: _____	Size and feet of main: _____
Hard surface restoration SF: _____	Hard surface restoration SF: _____
Other: _____	Other: _____

End of day questions	Y	N
Were any injuries reported today?	<input type="radio"/>	<input type="radio"/>
Did any quality incidents occur today?	<input type="radio"/>	<input type="radio"/>
Notes: _____		
Foreman signature: _____		

Lift Truck Daily Check Sheet

Department: _____ Operator Name: _____ Date: _____

LIFT TYPE Check one: [] LP Gas Sit [] Rough Terrain Sit [] Gas Sit [] Elect. Sit

Check (√) Item OK (X) Needs repair/adjustment (NA) Item does not apply to assigned lift

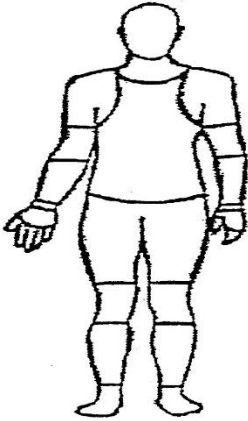
	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Safety Devices: shields, guards, overhead, backrest, indicator lights, belt and tether							
Engine oil – check oil level							
Coolant – check coolant level							
Tires and Wheels: drive wheels, load wheels, casters							
Forks: worn, bent, damaged							
Chains Cables & Hoses: in place, not damaged							
Leaks: drive units, breaks, hydraulics							
Battery: water level, caps on, no leaks, battery connectors, battery retainer							
Attachments: secured properly, no unusual noises							
Brakes, Parking Brake, Deadman: stops truck smoothly & quickly, brake override functions							
Hydraulic Controls: raise/lower, tilt, forward/backward, reach in/out, side shift left/right, no unusual noises							
Travel Controls: all speed ranges, forward and reverse no unusual noises							
Steering: no excessive binding or play							
Damage: bent, dented or broken parts							
Horn and Light: sounds							
Hour Meter: Operating							
Daily Hour Meter Reading (HD)							
OPERATOR'S INITIALS							

*Any items marked with an (X) shall be brought to the supervisor's attention to see if it requires immediate attention and a Work Order Request Form filled out for that problem.

Comments:

PPE Hazard Assessment Form

Task Assessed:	Assessor:	Assessment Date:
Brief Task Description:		

BODY PARTS AT RISK


- | | |
|--------------------------------------|---------------------------------|
| <input type="checkbox"/> Head | <input type="checkbox"/> Hand |
| <input type="checkbox"/> Face | <input type="checkbox"/> Finger |
| <input type="checkbox"/> Eye | <input type="checkbox"/> Back |
| <input type="checkbox"/> Ear | <input type="checkbox"/> Leg |
| <input type="checkbox"/> Respiratory | <input type="checkbox"/> Knee |
| <input type="checkbox"/> Neck | <input type="checkbox"/> Ankle |
| <input type="checkbox"/> Shoulder | <input type="checkbox"/> Foot |
| <input type="checkbox"/> Arm | <input type="checkbox"/> Toe |

PERSONAL PROTECTIVE EQUIPMENT

- | | |
|--|--|
| <input type="checkbox"/> Hard Hat | <input type="checkbox"/> Chemical Resistant Gloves |
| <input type="checkbox"/> Welding Helmet | <input type="checkbox"/> Cut Resistant Gloves |
| <input type="checkbox"/> Welding Goggles | <input type="checkbox"/> Knee Pads |
| <input type="checkbox"/> Face Shield | <input type="checkbox"/> Steel Toed Boots |
| <input type="checkbox"/> Safety Glasses | <input type="checkbox"/> Metatarsal Guards |
| <input type="checkbox"/> Safety Goggles | <input type="checkbox"/> Tyvek Coveralls |
| <input type="checkbox"/> Ear Plugs/Muffs | <input type="checkbox"/> FR Clothing |
| <input type="checkbox"/> Dust Mask | <input type="checkbox"/> Dielectric Equipment |
| <input type="checkbox"/> Particulate Respirator | <input type="checkbox"/> Body Harness & Lanyard |
| <input type="checkbox"/> Supplied Air Respirator | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> SCBA | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Kevlar Sleeves | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Elbow Pads | <input type="checkbox"/> Other _____ |

Respirator Fit Test Form

Employee Name:	Tester Name:	Date:
----------------	--------------	-------

ACTIVITIES REQUIRING RESPIRATORS	TYPES OF RESPIRATORS REQUIRED
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.

RESPIRATOR 1

Manufacturer:	Model:	Size:
Type of Test: <input type="checkbox"/> Qualitative <input type="checkbox"/> Quantitative	Quantitative Test Agent: <input type="checkbox"/> Bitrex <input type="checkbox"/> Irritant Smoke	Test Result: <input type="checkbox"/> Pass <input type="checkbox"/> Fail

RESPIRATOR 2

Manufacturer:	Model:	Size:
Type of Test: <input type="checkbox"/> Qualitative <input type="checkbox"/> Quantitative	Quantitative Test Agent: <input type="checkbox"/> Bitrex <input type="checkbox"/> Irritant Smoke	Test Result: <input type="checkbox"/> Pass <input type="checkbox"/> Fail

RESPIRATOR 3

Manufacturer:	Model:	Size:
Type of Test: <input type="checkbox"/> Qualitative <input type="checkbox"/> Quantitative	Quantitative Test Agent: <input type="checkbox"/> Bitrex <input type="checkbox"/> Irritant Smoke	Test Result: <input type="checkbox"/> Pass <input type="checkbox"/> Fail

RESPIRATOR 4

Manufacturer:	Model:	Size:
Type of Test: <input type="checkbox"/> Qualitative <input type="checkbox"/> Quantitative	Quantitative Test Agent: <input type="checkbox"/> Bitrex <input type="checkbox"/> Irritant Smoke	Test Result: <input type="checkbox"/> Pass <input type="checkbox"/> Fail

RESPIRATOR 5

Manufacturer:	Model:	Size:
Type of Test: <input type="checkbox"/> Qualitative <input type="checkbox"/> Quantitative	Quantitative Test Agent: <input type="checkbox"/> Bitrex <input type="checkbox"/> Irritant Smoke	Test Result: <input type="checkbox"/> Pass <input type="checkbox"/> Fail

Respirator Medical Questionnaire

EMPLOYEE INSTRUCTIONS: Complete all sections of this questionnaire and take it with you to your medical evaluation for the use of a respirator. Upon arriving at the clinic, deliver the completed copy directly to the physician who will conduct your evaluation. Do not give any copies or share the content with anyone else.

EMPLOYEE RIGHTS & RESPONSIBILITIES: By law our company must issue this questionnaire to all employees who are required to wear a respirator as a condition of their employment. We must also allow our employees to complete it during normal working hours or at a time and place that is convenient to them. To maintain confidentiality, we are not permitted to look at or review any answers listed on these questionnaires.

Name:	Job Title:	Age (to nearest year):
Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female	Height: _____ (feet) _____ (inches)	Weight (pounds):
Phone Number: () -	Today's Date:	

Can you clearly read and understand English? Yes No

Has our company told you how to contact the physician who will review this questionnaire? Yes No

Have you ever worn a respirator in the past? Yes No

If "yes" what types (check all that apply):

- | | |
|--|------------------------------------|
| <input type="checkbox"/> Filtering Facepiece (N95 or N99 mask) | <input type="checkbox"/> Full Face |
| <input type="checkbox"/> Air Purifying Respirator | <input type="checkbox"/> Half Face |
| <input type="checkbox"/> Powered Air Purifying Respirator | |
| <input type="checkbox"/> Supplied Air Respirator | |
| <input type="checkbox"/> Self-Contained Breathing Apparatus (SCBA) | |

PART A ~ UNIVERSAL QUESTIONS (ALL employees who wear a respirator must answer the following)

QUESTION	YES	NO
A1. Do you currently smoke tobacco, or have you smoked in the last month?		
A2. Have you ever had any of the following conditions?		
a. Seizures (fits)		
b. Diabetes (sugar disease)		
c. Allergic reactions that interfere with breathing		
d. Claustrophobia (fear of closed-in places)		
e. Trouble smelling odors (except when you had a cold)		
A3. Have you ever had any of the following pulmonary or lung problems?		
a. Asbestosis		
b. Asthma		
c. Chronic bronchitis		
d. Emphysema		
e. Pneumonia		
f. Tuberculosis		
g. Silicosis		
h. Pneumothorax (collapsed lung)		
i. Lung cancer		
j. Broken ribs.		
k. Any chest injuries or surgeries		
l. Any other lung problem that you've been told about		

QUESTION	YES	NO
A4. Do you currently have any of the following symptoms of pulmonary illness?		
a. Shortness of breath		
b. Shortness of breath when walking fast on level ground/walking up a slight hill/incline		
c. Shortness of breath when walking with people at an ordinary pace on level ground		
d. Have to stop for breath when walking at your own pace on level ground		
e. Shortness of breath when washing or dressing yourself		
f. Shortness of breath that interferes with your job		
g. Coughing that produces phlegm (thick sputum)		
h. Coughing that wakes you early in the morning		
i. Coughing that occurs mostly when you are lying down		
j. Coughing up blood in the last month		
k. Wheezing		
l. Wheezing that interferes with your job		
m. Chest pain when you breathe deeply		
n. Any other symptoms that you think may be related to lung problems		
A5. Have you ever had any of the following cardiovascular or heart problems?		
a. Heart attack		
b. Stroke		
c. Angina		
d. Heart failure		
e. Swelling in your legs or feet (not caused by walking)		
f. Heart arrhythmia (heart beating irregularly)		
g. High blood pressure		
h. Any other heart problem that you've been told about		
A6. Have you ever had any of the following cardiovascular or heart symptoms?		
a. Frequent pain or tightness in your chest.		
b. Pain or tightness in your chest during physical activity		
c. Pain or tightness in your chest that interferes with your job		
d. In the past two years, have you noticed your heart skipping or missing a beat		
e. Heartburn or indigestion that is not related to eating		
f. Any other symptoms that you think may be related to heart or circulation problems		
A7. Do you currently take medication for any of the following problems?		
a. Breathing or lung problems		
b. Heart trouble		
c. Blood pressure		
d. Seizures (fits)		
A8. Has your wearing a respirator caused any of the following problems? (If you've never used a respiratory check the following space and go to Question #9.)	YES	NO
a. Eye irritation		
b. Skin allergies		
c. Anxiety that occurs only when you use the respirator		
d. Unusual weakness or fatigue		
e. Any other problem that interferes with your use of a respirator		
A9. Would you like to talk to the health care professional who will review this questionnaire about your answers to this questionnaire?		

PART B ~ FULL FACE RESPIRATOR QUESTIONS (ALL employees who wear full face respirators and/or SCBA respirators must answer the following)

QUESTION	YES	NO
B1. Have you ever lost vision in either eye (temporarily or permanently)?		
B2. Do you currently have any of the following vision problems?		
a. Wear contact lenses		
b. Wear glasses		
c. Color blind		
d. Other eye or vision problems		

QUESTION	YES	NO
B3. Have you ever had an injury to your ears, including a broken eardrum?		
B4. Do you currently have any of the following hearing problems?		
a. Difficulty hearing		
b. Wear a hearing aid		
c. Any other hearing or ear problem		
B5. Have you ever had a back injury?		
B6. Do you currently have any of the following musculoskeletal problems?		
a. Weakness in any of your arms, hands, legs, or feet		
b. Back pain		
c. Difficulty fully moving your arms and legs		
d. Pain or stiffness when you lean forward or backward at the waist		
e. Difficulty fully moving your head up or down		
f. Difficulty fully moving your head side to side		
g. Difficulty bending at your knees		
h. Difficulty squatting to the ground		
i. Difficulty climbing a flight of stairs or a ladder carrying more than 25 lbs		
j. Any other muscle or skeletal problem that interferes with using a respirator		

PART C ~ ADDITIONAL PHYSICIAN QUESTIONS (Any of the following questions, or questions not listed, may be added to the questionnaire at the discretion of the physician conducting the review)

QUESTION	YES	NO
C1. 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?		
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?		
C2. At work or at home, have you ever been exposed to hazardous solvents, hazardous airborne chemicals (i.e., gases, fumes, dust), or have you come into skin contact with hazardous chemicals?		
If yes, name the chemicals if you know them:		
C3. Have you ever worked with any of the materials, or under any of the conditions listed below?		
a. Asbestos		
b. Silica (i.e., in sandblasting)		
c. Tungsten/cobalt (i.e., grinding or welding this material)		
d. Beryllium		
e. Aluminum		
f. Coal (i.e., mining)		
g. Iron		
h. Tin		
i. Dusty environments		
j. Any other hazardous exposures. If yes, describe these exposures:		
C4. List any second jobs or side businesses that you have:		
C5. List your previous occupations:		
C6. List your current and previous hobbies:		

QUESTION	YES	NO
C7. Have you been the military services?		
If yes, were you exposed to biological or chemical agents (in training or combat)?		
C8. Have you ever worked on a HazMat team?		
C9. 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)?		
If yes, name the medications if you know them:		
C10. Will you be using any of the following items with your respirator(s)?		
a. HEPA Filters		
b. Canisters (i.e., gas masks)		
c. Cartridges		
C11. How often are you expected to use the respirator(s)? Check "Yes" or "No" for all answers that apply to you.		
a. Escape only (no rescue)		
b. Emergency rescue only		
c. Less than 5 hours per week		
d. Less than 2 hours per day		
e. 2 - 4 hours per day		
f. Over 4 hours per day		
C12. During the period you are using the respirator(s), is your work effort:		
a. Light (less than 200 kcal per hour) If yes, how long does this period last during the average shift _____ hours _____ minutes. Examples 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 250 kcal per hour) If yes, how long does this period last during the average shift _____ hours _____ minutes. Examples 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) If yes, how long does this period last during the average shift _____ hours _____ minutes. Examples 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.)		
C13. Will you be wearing protective clothing and/or equipment (other than the respirator) when you're using your respirator?	YES	NO
If yes, describe the protective clothing and/or equipment:		
C14. Will you be working under hot conditions (temperatures exceeding 77° F)?		
C15. Will you be working under humid conditions?		
C16. Describe the work you'll be doing while you're using your respirator(s):		
C17. Describe any special or hazardous conditions you might encounter when you're using your respirator(s) (i.e. confined spaces, lift threatening gases):		

QUESTION	YES	NO
C18. 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:		
b. Estimated maximum exposure level per shift:		
c. Duration of exposure per shift:		
d. Name of the second toxic substance:		
e. Estimated maximum exposure level per shift:		
f. Duration of exposure per shift:		
g. Name of the third toxic substance:		
h. Estimated maximum exposure level per shift:		
i. Duration of exposure per shift:		
j. The name of other toxic substances that you could be exposed to while using your respirator:		
C19. Describe any special responsibilities you'll have while using your respirator(s) that may affect the safety and well being of others (i.e., rescue, security):		

Respirator Information for the Physician

This form must be completed by the Safety Director, Regional Safety Manager, or designated SQC/RTT and sent to the treating physician for review and consideration before an employee is issued a medical evaluation for the use of a respirator.

Employee Wearing Respirator:	Date:
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1. The types of respirators the employee will wear:

- | | |
|--|------------------------------------|
| <input type="checkbox"/> Filtering Facepiece (N95 or N99 mask) | <input type="checkbox"/> Full Face |
| <input type="checkbox"/> Air Purifying Respirator | <input type="checkbox"/> Half Face |
| <input type="checkbox"/> Powered Air Purifying Respirator | |
| <input type="checkbox"/> Supplied Air Respirator | |
| <input type="checkbox"/> Self-Contained Breathing Apparatus (SCBA) | |

2. How frequently the employee will wear these respirators (on average): _____

3. How long (on average) the employee will wear these respirators each time they use them: _____

4. Physical work activities they might perform while wearing respirators: _____

5. Additional protective clothing and equipment they might wear in addition to a respirator: _____

6. The average temperature of their work environment: _____

7. Any additional information that could put more strain on the employee while wearing a respirator: _____

If there are any further questions above this employee's work activities, please contact:

Miller Pipeline Contact Person:	Phone Number:
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Rigging Monthly Inspection Report

Location:	Inspector Name:	Inspection Date:			
INSPECTION ITEM			Yes	No	N/A
1. Has all defective rigging been removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2. Are running lines 6 feet 6 inches off the ground or working level guarded?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3. Are positive latching devices used to secure loads?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4. Are defective wire rope cut up or marked as unusable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
5. Do rope clips have the U-bolts on the dead end or short end of the wire rope?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
6. Are protruding ends of strands in splices on slings and bridles covered or blunted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
7. Except for eye splices and endless wire rope slings; is wire rope one continuous piece, free of splices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
8. Do all eye splices have at least 5 full tucks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
9. Are wire ropes free of eyes or splices formed by wire rope clips or knots?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
10. Are all chains alloyed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
11. Do all coupling links or other attachments have rated capacities at least equal to that of the chain?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
12. Are makeshift fasteners restricted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
13. Are all fiber ropes protected from freezing, excessive heat, or corrosive materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
14. Are all ropes protected from abrasion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
15. Are fiber rope splices made in accordance with the manufacturer's recommendations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
16. Do all manila rope splices contain at least 3 full tucks & do short splices contain at least 6 full tucks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
17. Do all synthetic fiber rope splices contain at least 4 full tucks & do short splices contain at least 8 full tucks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
18. Is protection provided between slings and sharp surfaces?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
19. Does each wire rope have affixed durable permanent identification tag stating required information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
20. Is each synthetic web sling, metal mesh sling, & round sling marked to identify required information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
21. Are drums, sheaves, and pulley smooth and free of surface defects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
22. Is the ratio of the diameter of the rigging and the drum, block sheave, or pulley thread such that the rigging will adjust without excessive wear, deformation, or damage?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
23. Have all damaged drums, sheaves, and pulleys been removed from service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
24. Are all connections, fittings, fasteners, attachments of good quality, proper size, and strength, and installed in accordance with manufacturer's recommendations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
25. Do all drums have sufficient rope capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
26. Is the drum end of the rope anchored by a clamp in a manner approved by the manufacturer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
27. Do grooved drums have the correct groove pitch for the diameter of the rope and is the groove depth correct?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
28. Are there at least 3 full wraps (not layers) of rope remaining on the drum at all times?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
29. Are the sheaves compatible with the size of the rope used as specified by the manufacturer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
30. Are sheaves properly aligned, lubricated, and in good condition?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Item #	Repair Notes

Subcontractor Prequalification Survey

GENERAL INFORMATION

Company Name:		Company Address:	
Contact Person:	Phone Number:	Email Address:	
Date:	* NAICS Code:	Miller Pipeline Contact Person:	

* NAICS stands for "National American Industry Classification System". This is a number that identifies what type of industry you work in. You can find your code at <http://www.census.gov/epcd/naics07/>.

STATISTICAL DATA

METRIC	Current Year	1-Year Prior	2-Years Prior
Experience Modification Rate (EMR)			
** Recordable Incident Rate (RIR)			
** Lost Time Incident Rate (LTIR)			
Total Hours Worked			
Total Number of Employees			

** Neither of these fields are required for companies with 10 or less employees. Both of these rates are calculated by multiplying the total number of incidents for that period of time by 200,000 and then dividing the sum by the total number of hours worked.

- Has your company experienced any fatalities within the last 5-years? YES NO
If yes, please provide a detailed explanation of the event(s).
- Has your company been issued any OSHA citations within the last 3-years? If yes, please provide detailed information on these citation(s). YES NO

HEALTH & SAFETY PROGRAMS

- Does your company have a comprehensive written health & safety program that satisfies all of OSHA's program requirements (e.g. Fire Prevention, Hazard Communication, Bloodborne Pathogens, Fall Protection, etc.)? YES NO
- Does your company conduct all employee training programs as required by OSHA (e.g. PPE, Fire Extinguisher, Ladder Safety, Confined Space Entry, Respiratory Protection, Excavation Competent Person, etc.)? YES NO
- Does your company conduct formal safety meetings?
If so, who conducts them and how often? _____

- Does your company conduct formal safety inspections?
If so, who conducts them and how often? _____

- Does your company have a formal disciplinary action policy in use? YES NO

HEALTH & SAFETY PROGRAMS (continued...)

- If you use any subcontractors while performing work for Miller Pipeline will you utilize a process to prequalify and manage their safety performance? YES NO

SUPPLEMENTAL INFORMATION

- Describe some ways that you go above and beyond OSHA compliance to ensure the safety of your employees (i.e. Project Specific Safety Plans, Incentive Programs, Daily Planning Huddles, etc.):

- Provide *electronic* copies of the following when submitting this survey to our Safety Director:
 - OSHA 300A Summaries for the past 3-years (*if you have more than 10 employees*).
 - EMR for the past 3-years on insurance letterhead.
 - Detailed information on any fatalities within the past 5-years.
 - Detailed information on any OSHA citations within the past 3-years.
 - A copy of your Corporate Health & Safety Plan.

APPROVAL (Miller Pipeline Use Only)

- This company meets all minimum criteria as stated in our "Subcontractor Management Plan" and is therefore approved for use by Miller Pipeline on _____.
- This company must be reviewed and approved by the President & COO of Miller Pipeline.
 - Approved
 - Not Approved

Signature

Date

Subcontractor Registration

Thank you for your interest in becoming a registered subcontractor with Miller Pipeline. All subcontractors are required to complete the following Subcontractor Application. This application contains questions regarding general company information, as well company safety record. Upon completion of the application, it will be reviewed by Miller Pipeline, and you will receive notice of vendor status.

Although a subcontract agreement may be included with this packet, an approved Subcontractor Application is required before the agreement can be signed. A separate notification requesting signatures for the subcontract agreement will be sent upon approval of the Subcontractor Application. Please feel free to review the terms of the agreement while the application is being processed.

If you have any questions regarding the process or the application, please contact Daniel Watters 317-653-5298 or daniel.watters@millerpipeline.com.



Subcontractor Registration

Company Name: _____

Contact Name: _____

Phone Number: _____ Email _____

Hours worked last year: _____

Safety Point of Contact Name: _____ Phone: _____

Email: _____

Attach previous 3 years of OSHA Logs (Form 300) including summary sheet (300A) for each year:

Total OSHA recordable incident rate (TRIR) for the last three years:

Year 1 _____

Year 2 _____

Year 3 _____

Experience Modification Rate (EMR) for the last 3 years:

Year 1 _____

Year 2 _____

Year 3 _____

Does the company have an OQ (Operator Qualification) Training Program? _____ (OQ only applies to required work on natural gas systems)

Will the Company be performing work on this contract that requires utility locates? _____

If yes, is the Company DPI Accredited? _____

Has the company been cited by OSHA within the last 3 years? _____

If yes, please describe the citation (s) below or attach a file with description:

Safety Qualifications		Approval Date (Enter in AS-400)		Vend ID#		AS-400 Setup Complete	
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<u>Location:</u>	<u>Date:</u>	<u>Welding Rig Owners Name:</u>	<u>Vehicle and Welding Machine Year, Make, and Model:</u>
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Please place an "X" for the applicable selection of each item.

Welding Machine		Satisfactory	Unsatisfactory
1	All Receptacles Protected by GFCI		
2	Welding Leads In Safe Working Condition		
3	Gas Cylinders and Gauges In Safe Working Condition		

Truck		Satisfactory	Unsatisfactory
1	All Lights In Working Condition		
2	Tires In Safe Working Condition		
3	Valid Registration and Insurance Present		
4	Windshield Not Cracked		
5	Fire Extinguisher Present		
6	Fire Extinguisher Inspection Completed		
7	Windshield Wipers Operable		
8	Horn		
9	Contents In/On Bed Secured		
10	Seatbelt In Proper Working Condition		

List any deficiencies/defects below.

<u>Name:</u>	<u>Signature:</u>