



KUHLKE CONSTRUCTION & ASSOCIATES, INC.

KUHLKE CONSTRUCTION &
INDUSTRIAL SERVICES

Safety Handbook

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STATEMENT OF POLICY

Kuhlke Construction & Associates, Inc. (KCA) is sincerely interested in the safety and welfare of our employees! Accident prevention shall be of the utmost priority for all KCA operations. KCA and our employees shall not engage in the use of unsafe practices, nor will we permit unsafe conditions to exist that could compromise the safety of any person or property, or the integrity of the services we provide.

It shall be the policy of Kuhlke Construction & Associates, Inc. to provide a safe and healthy place of employment for every employee and to abide by regulations set forth by federal, state, and local governments. Safety and accident prevention is EVERYONE's responsibility. Each KCA supervisor and foreman is responsible for the implementation and enforcement of the KCA safety program on their project site. Each KCA employee is expected to follow all KCA rules and to perform their work in a safe manner. The Safety Manager has the corporate responsibility and authority for safety and accident prevention.

This KCA safety handbook has been prepared as a guide for use by all KCA employees and our subcontractors in the performance of their duties. This handbook of rules and policies is not intended to be all inclusive. It is impossible to publish a set of rules that address every potential circumstance that may be encountered. If a rule or policy that might cover a specific hazardous condition is not included in this KCA manual, that omission shall NOT be an excuse for negligence or the failure to use "common sense" in the safe performance of your work.

Though this document is intended to be consistent with OSHA (Occupational Safety and Health Act) regulations and standards, if an area of this document is considered by the reader to be inconsistent with those regulations and standards, the rule or policy that provides the greatest protection to human life should be applied.

Each KCA employee shall cooperate fully with this policy! Abuse or disregard of this policy shall constitute a violation and the violator will be treated accordingly. If you have any questions concerning these requirements you should contact your supervisor immediately to seek clarification. Your supervisor has the responsibility of clarifying the issue with KCA management.

Remember, your help in preventing accidents and injuries benefits you and your fellow employees. WE SHOULD ALL STRIVE FOR A RECORD OF ZERO ACCIDENTS AND INJURIES!

INTRODUCTION

A. General Requirements

- 1) Kuhlke Construction & Associates, Inc. (KCA) shall promote and encourage a strong culture of safety extending from the management level to the field staff and to all subcontractors and other stakeholders involved in our operations.
- 2) KCA believes that safety, quality, and cleanliness are vitally important in our daily operations. KCA will not allow the use of unsafe practices, nor will it permit unsafe conditions to exist that may compromise the safety and health of persons or property associated with our operations.
- 3) The provisions of this document do not in any way relive KCA employees or our subcontractors of the responsibility for safe work performance. Rather, it is intended to guide and assist the employee in the implementation of a safe work environment. This document presents general requirements demanded by KCA. KCA employees are expected to comply with these rules as well as generally accepted standards for safety, OSHA standards and regulations, and any additional requirements that may be demanded by our customers on any task or project assigned to KCA.
- 4) The provisions of this document are intended to support and supplement OSHA regulations and standards. Where the reader may encounter differences in a particular policy or standard, the standard that provides the greatest safety to human life shall apply to the task or project.
- 5) Every reasonable effort should be taken to assure the safety of persons and property in all situations. No KCA employee shall be required to perform a task or enter a work site if he/she feels his/her personal safety is unreasonably compromised. KCA may permit an employee to enter an unsafe work area only if it is for the purpose of making the area safe and only if his/her safety is reasonably protected. A comprehensive review of how to accomplish such a dangerous task with the least possible risk to the worker shall be completed prior to the worker entering an area deemed to be unsafe.
- 6) KCA supervisors and foremen can and will refuse/restrict personnel and the certain use of tools, equipment, or materials, based on a safety analysis and assessment of potential hazards related to such use to accomplish a particular task or project.

B. Definitions

Subcontractor – A qualified entity engaged by KCA to perform a task or to provide a service for the benefit of KCA and/or our clients. KCA subcontractors and their employees shall be contractually obligated to support and affirm the rules, policies, and statements contained in this document. All subcontractors engaged in service on any KCA project site shall be bound by these policy provisions and the safe work rules demanded in this document.

Safety Handbook Compliance Agreement – This agreement, when signed by a KCA employee or subcontractor, is acknowledgment that the signer has been presented with, reviewed, understood, acknowledged, and accepted responsibility for the KCA safety rules, policies, and statements included in this document.

Imminent Danger – Any existing condition or work practice which could cause death or serious physical harm to persons or property. Examples of conditions which may present Imminent Danger in the workplace include, but are not limited to:

1. Unprotected elevated platforms or work areas where there may be a potential for a fall (*fall hazards*)
2. Open and unprotected excavations not properly sloped or shored (*excavation and trenching hazards*)
3. Exposed energized electrical systems (*electrocution hazards*)
4. Rolling motorized vehicles, machinery, and/or other heavy equipment (*heavy equipment hazards*)
5. Enclosed spaces (*confined space hazards*)
6. Presence of harmful chemicals in the work area
7. Any energized systems that contain electricity, pressure, flammability, or caustic chemical(s) that are not properly protected (*lockout/tagout*)

OSHA – This acronym refers to the Occupational Safety and Health Act of 1970 and/or the Occupations Safety and Health Administration which is the agency created by the United States Congress under the U.S. Department of Labor to assure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education, and assistance.

C. Assignment of Responsibilities

Management & Executive

- Has the overall responsibility for the KCA safety program and regularly reaffirms support for accident prevention strategies and loss control activities.
- Ensures that all employees are informed of management's commitment to safety and the abidance of all federal, state, and local regulations.
- Shall establish the KCA safety rules and programs, and provides supervision and field staff with the support, training, and financial resources necessary to implement these rules and programs in the field.

Safety Coordinator

- Responsible for implementing and monitoring the KCA safety program.
- Reviews and maintains current publications and references for all applicable federal, state, and local safety and health regulations.
- Implements, coordinates, and monitors necessary safety training and orientation programs for all new KCA employees.
- Implements, coordinates, and monitors necessary safety training, continuing education, and certification renewals for all existing KCA employees.
- Assists site supervision in accident investigation and recommends controls to prevent any reoccurrence.
- Assures proper notification should an accident occur.

Project Management

- Will, prior to the commencement of any project, provide our client a copy of or access to the KCA Safety Handbook.
- Will, prior to the commencement of any project, request, receive, examine, maintain, and manage a copy of our clients' Safety Policies & Standards if such a document exists.
- Will, prior to the commencement of any project, request safety metrics & data (i.e., TRIR, EMR, OSHA logs, etc.) from subcontractors, and use this information as a basis for selection for the project.
- Will review, distribute, and share any client specific safety related rules and regulations with all KCA employees and subcontractors engaged in service for that client.
- Will coordinate a pre-construction meeting (if applicable) with our client's Plant Technical Manager, Site/Project Management, Facility Engineer, Operations Manager, Maintenance Manager, or other designee to review the project and assess all potential safety hazards that may be encountered.

- Will inspect and examine the site and work area at the conclusion of the project for the specific purpose of evaluating and noting how the KCA safety practices were applied by employees and subcontractors and how our policies and practices might be improved. The Project Manager will make recommendations to the Safety Coordinator for potential amendments to this document based on his/her review.
- Will, upon each visit to his/her project site, inspect the general work area for conditions that may present hazards, Additionally, he/she will enforce the KCA safety work rules and policy if he/she should find violations among KCA employees or our subcontractors.

Supervisors & Foremen

- Responsible for the safety of their employees and other human life on their project site.
- Oversees the compliance with the KCA Safety Program and other applicable federal, state, and local regulations.
- Will, to the greatest extent possible, be present at the project site and regularly evaluate the conditions, means, and methods for potential hazards. Upon recognition of such hazards, he/she will determine which hazards are more dangerous based on severity and immediately take necessary action to correct the condition such that those hazards are minimized or eliminated first.
- Participates in the KCA safety kick-off meeting and work rules review at the commencement of each project.
- Will complete a Daily Work Report/Job Safety Analysis at the beginning of each shift and review with all employees/subcontractors involved.
- Have customer/client representative review and sign-off on work done each day.
- Support and enforce the requirements contained in this document.
- Educate KCA employees and subcontractors about the KCA safety standards and policies contained in this document. He/she shall always maintain a copy of this document on his/her project site and provide additional copies to employees and subcontractors upon their request.
- Accepts personal responsibility to be trained and acknowledges the adequacy of their training in the safe performance of all work to be performed on their site. Such training includes appropriate health and safety aspects of any specific task to be performed.
- Advise personnel working on his/her site of all hazards associated with the task to be performed, including the location of any hazard reference information maintained by the client.
- Maintains a clean, organized, and accessible reference (*i.e., file*) of Safety Data Sheets (SDSs) for chemicals that exist or may exist on his/her project site. This reference shall always be located on the project site when work is being performed.

- Inspects, demands, and assures that tools and equipment, including personal protective equipment, utilized on his/her site are properly maintained and suitable for safely accomplishing the task the equipment or tool is designed to perform.
- Accepts responsibility for maintaining a clean and safe work area and project site that is free from clutter and trip hazards.
- Shall ensure worksite has proper illumination as necessary to complete job task(s) safely.
- Shall provide and maintain appropriate first aid equipment on site. All first aid kits shall consist of appropriate items and shall be periodically inspected to ensure availability of adequate first aid supplies.
- Shall conduct periodic safety audits of his/her project site and document deficiencies in Safety Observation Reports. This should include continuous housekeeping and safety reviews of the project work area, while ensuring any risks/hazards found earlier are still being addressed and mitigated.
- Assembles and leads weekly safety meetings with all KCA employees and subcontractor personnel that are currently engaged in work at the project site.
- Accepts responsibility to immediately report all accidents or violations of the KCA safety policy or client safety policy to the Project Manager, Safety Coordinator, or Client/Owner designee and to prepare a written report of the accident or violation within 24 hours of the occurrence.
- Arranges for prompt medical attention and transportation, if necessary, in the case of an injury, and provides a thorough written investigative report including recommendations to prevent future accident occurrence.

KCA Employees & Subcontractors

- Responsible for learning and abiding by the rules and regulations contained in this document which are applicable to their assigned task.
- Shall report to their supervisor all accidents and “near-misses”.
- Shall report to their supervisor all conditions in which a potential for an accident exists.
- Perform their functions with the greatest regard for safety for themselves and their co-workers. They shall encourage their co-workers to do likewise.
- Will be included in all tailgate safety meetings, job safety analyses & hazard assessments, and in job safety inspections.
- Subcontractors will be included in all pre-job meetings and safety orientations; in addition, subcontractors’ safety performance will be reviewed after completion of job.
- Subcontractors shall provide to project management, prior to commencement of any project, all safety metrics & data (*i.e.*, *TRIR*, *EMR*, *OSHA logs*, *etc.*). Project management will select subcontractors for a project based on these criteria.

D. Penalties & Remedial Action

If it is discovered that the rules, policies, and minimal safety standards noted in this manual have been willfully or accidentally violated by a KCA employee or subcontractor, remedial action will be taken by the appropriate KCA supervisor to prevent and/or discourage future violations from occurring.

KCA management and/or the appropriate supervisor will apply appropriate penalties based, in their judgment, on the severity of the violation. The following actions may be taken to prevent future violations:

- 1) Employees and subcontractors who have been found to be in violation of a safety policy will, in all cases, be given a verbal warning by their supervisor in which the violation is discussed, and the employee is warned that no such future violations should occur lest he/she be subject to additional penalties.
- 2) Employees and subcontractors who have been found to be in violation for the first time or has repeated a prohibited act may be issued a written warning demanding that the prohibited practice be discontinued immediately. He/she will be warned that additional violations may result in more severe penalties which may include immediate termination of employment.
- 3) Employees and subcontractors who have been found to be in violation for the first time or has repeated a prohibited act may be suspended and/or terminated immediately depending on the severity of the violation.
- 4) KCA employees and subcontractors must acknowledge that certain acts prohibited by these rules and regulations are of such severity that a first-time offense can, and most likely will, result in immediate termination of employment or contractual engagement. These offenses include but are not limited to:
 - Possession of alcoholic beverages and/or illegal drugs on a KCA work site.
 - Consumption of and/or the suspicion of being under the influence of alcohol or drugs on a KCA project site.
 - Possession of firearms and/or ammunition on a KCA project site. Firearms will not be permitted on any KCA project site.
 - Theft or larceny of any kind on a KCA project site.
 - Vandalism of any kind on a KCA project site.
 - An illegal act of any kind while employed by KCA.
 - Any intentional act that creates or causes a disruption of KCA and/or client operations.
 - Disobeying a customer's direct instructions.
 - Smoking in prohibited areas of the project site.
 - Any form of industrial espionage.
 - Any willful neglect or willful violation of any KCA policy intended to protect the safety of persons and property.

- Any willful intent to harm another person on a project site (*i.e., fighting, practical jokes, etc.*).
- Failing to abide by KCA lockout/tagout requirements.
- Failing to follow safe work requirements in the proximity of energized (*pressure, electrical, chemical, etc.*) systems.
- Failing to take necessary precautions in and around fall hazards, excavation hazards, and in the proximity of machinery.
- Failing to abide by “Hot Work” program requirements.

E. Training

New Hire Training

- 1) All new KCA employees will be required to complete KCA Safety Handbook, Hazard Communication Program, and Drug & Alcohol Policy training with the Safety Coordinator or appropriate designee prior to commencement of work on any KCA project site.
- 2) All KCA employees will be retrained on the KCA Safety Handbook, Hazard Communication Program, and Drug & Alcohol Policy annually.
- 3) All new KCA employees will receive, read, and acknowledge receipt of, and training in, this KCA Safety Handbook
- 4) All new KCA employees will be trained on the hazard recognition/identification process and avoidance of such hazards. Retraining will be done at least annually, with periodic refresher training throughout the year.
- 5) All new KCA employees will be trained on the proper use of fire extinguishers, the general principles of fire extinguisher use, and the hazards involved in incipient stage firefighting. Retraining will be done at least annually, with periodic refresher training throughout the year as needed.
- 6) All new KCA employees will be enrolled in an OSHA 10 Hour course and must completed the course within 90 days of beginning work in the field unless employee has already been trained and has proper documentation.
- 7) All new KCA supervisors and foremen will be enrolled in an OSHA 30 Hour course and must complete the course within 90 days of beginning work in the field unless employee has already been trained and has proper documentation.
- 8) All KCA supervisors and foremen will receive First Aid/CPR training & certification from a certified organization/trainer. Refresher training and certification renewal will occur every 2 years.
- 9) Training records will be kept by the Safety Coordinator for no less than 3 years.

GENERAL POLICIES

A. Hazard Identification, Risk Assessment, and Control

The following procedures should be used to identify and evaluate both existing and potential hazards on worksite as well as to control and eliminate the hazards identified.

The supervisor or otherwise nominated competent person shall start the hazard identification process before the job begins by identifying hazards that are known to exist on site and documenting them. By identifying hazards early, the supervisor or competent person has an opportunity to implement controls before any workers arrive on site. To ensure the hazard identification process is thorough, the supervisor or competent person should:

- 1) Look at all aspects of the work
- 2) Include non-routine activities such as maintenance, repair, or cleaning
- 3) Look at accident/incident/near-miss records (including for workers who work "off-site" either at home, on other job sites, drivers, etc.)
- 4) Ensure all affected workers be actively involved in the risk identification and assessment process; hazards and risks should be reviewed with all affected workers
- 5) Look at the way the work is organized or "done" (include experience and age of people doing the work, systems being used, etc.)
- 6) Look at foreseeable unusual conditions (for example: possible impact on hazard control procedures that may be unavailable in an emergency situation, power outage, etc.)
- 7) Examine risks to visitors or the public
- 8) Include an assessment of groups that may have a different level of risk such as young or inexperienced workers, etc.
- 9) Look for continuous improvement process for lessons learned to be incorporated into hazard controls

The hazard identification process is used for routine and non-routine activities as well as new processes, changes in operation, products, or services as applicable. All workers shall be trained on workplace hazards and how to identify, report, or control them. The assessment process must be completed prior to the start of all jobs to identify existing or potential hazards to workers and eliminate or control these hazards using engineering or administrative controls, proper training, or the use of personal protective equipment (PPE). All company workers should be trained on hazard identification and risk assessment.

All workers are required to take a proactive approach to managing and reporting hazards. When they observe a hazard, they are required to take steps to correct that hazard directly (provided they are adequately knowledgeable and/or trained to safely do so) and eliminate the hazard or get assistance to do so whenever reasonably possible. Where hazards cannot be eliminated immediately, workers

should take necessary steps to warn others of the hazard. Always report hazardous or potentially hazardous conditions and acts to a supervisor or competent person.

KCA has a formal process for identifying potential hazards. Processes are in place to identify potential hazards using Daily Work Reports (DWR), Safety Observation Reports (SOR), and/or facility wide or area specific analysis/inspections. Information shall be collected, organized, and reviewed with workers to determine which workers may be exposed or potentially exposed. Risk assessments should be done at a minimum, prior to beginning work. A risk assessment must be conducted whenever changes occur to processes, equipment, weather, or facilities. This process ensure that workers are actively involved in the hazard identification process and hazards are reviewed with all workers.

Once hazards are identified, they need to be addressed based on the level of risk associated with each individual hazard. The level of risk assigned to a hazard is based on the degree of harm likely to result from exposure to the hazard, the expected frequency of exposure, and the percentage of the workforce that will be exposed. Priority of hazard mitigation shall be established by the risk level assigned to each hazard. Once risk level and priority has been assigned to each hazard, the hierarchy of controls should be utilized to address each hazard in the order presented below:

- 1) Elimination (including substitution): Remove the hazard from the workplace.
- 2) Engineering Controls: includes designs or modifications to equipment, ventilation systems, and processes that reduce the source of exposure.
- 3) Administrative Controls: controls that alter the way the work is done, including timing of work, policies and other rules, and work practices such as standards and operating procedures (including training, housekeeping, equipment maintenance, and personal hygiene practices).
- 4) PPE: equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise.

These methods are also known as the "hierarchy of control" because they should be considered in the order presented (it is always best to try to eliminate the hazard first, etc.).

Repeat the Hazard Assessment process when site conditions change, when new tasks are added, or when new workers join the crew in order to prevent the development of unsafe working condition.

B. Subcontractor Safety Management

Subcontractors for KCA shall be selected and managed in a manner consistent with the overall company's safety objectives, policies, and procedures embodied in the other sections of this manual. KCA will set a basis for the selection of safe subcontractors and will set procedures to assure that subcontractors' safety activities are equal to or exceed those of KCA. It is required that safety performance

be considered initially, and annually thereafter, in the selection of subcontractors, using the following criteria:

Prospective subcontractors shall be required to furnish their Experience Modification Rate (EMR) for the past three years. In the event of an EMR greater than 1.0, a more detailed evaluation of their safety program is required.

Prospective subcontractors shall be required to submit copies of OSHA logs (or equivalent summary data) for the previous three years and applicable hours of exposure. Subcontractor incident frequency and severity rates will be examined and compared for acceptability with comparable incident rates for relevant work sites (if available) and industry average incident rates.

Prospective subcontractors shall be required to provide information (reason, corrective action, and fines) regarding OSHA citations during the past three years. A history of frequent violations, infrequent but repeated violations, or violations applicable to the work to be performed will warrant further investigation.

Evaluation of Subcontractor Safety Program

The prospective subcontractor shall demonstrate that their safety policies meet or exceed KCA's requirements. The following areas are a minimum that shall be addressed by the subcontractor:

- 1) The program should be industry specific, not generic, and should be responsive to the exposures prevalent in the industry
- 2) The program should contain elements of supervisor accountability for safety, accidents, and claims
- 3) Safety meetings should be held regularly, with documentation as to the topic, who attended, and a review of past losses
- 4) Safety audits (inspections) should be conducted by the subcontractor on a regular basis
- 5) Audit results should be documented to identify deficiencies and corrective actions taken
- 6) The program should provide for worker safety training, including the documentation of the training

Pre-Job Planning

The understanding of KCA and the subcontractor on important issues should be written and signed by both parties as part of the subcontract agreement and scope of work. All subcontractors are required to report incidents/injuries in writing within 4 hours to their designated KCA contact. The subcontractor and KCA will review and assign notification and recordkeeping requirements. Examples of such issues would be:

- 1) Provision of tools and equipment and inspection thereof

- 2) Performance in accordance with OSHA and other regulatory bodies
- 3) Provision of all necessary personal protective equipment (PPE), training on its use, and enforcement of usage at the worksite
- 4) Responsibility for housekeeping and debris removal efforts
- 5) Responsibility for utility mark out, maintenance, and traffic protection
- 6) Defining the roles and responsibilities for the supervision and direction of the subcontractors
- 7) Reporting and recordkeeping of incidents/injuries including near misses

Subcontractors will be included in the following safety activities:

- 1) Safety Audits
- 2) Safety Meetings
- 3) Training Sessions
- 4) Work Observations
- 5) Job Safety Analysis Systems
- 6) Hazard Analysis including Site inspections
- 7) Injury Intervention Processes
- 8) Root Cause Analysis

A post job review will be performed to evaluate the overall safety performance of the subcontractor.

C. Identification & Verification

- 1) All Kuhlke Construction & Associate (KCA) employees and subcontractors must check-in with their KCA site supervisor prior to entering or leaving any KCA work site. Personnel will identify themselves and their employer to the appropriate KCA supervisor. Additional verification and credentials may be required based on the specific demands of the project and our client.
- 2) KCA supervisors and management personnel always have the authority to grant or deny access to the KCA project site.
- 3) KCA supervisors can and will engage law enforcement to forcibly remove an individual from a KCA site if necessary. KCA employees are not themselves permitted to use physical force to remove any person from a project site unless that person's presence presents imminent danger to others.
- 4) The KCA site supervisor may be required to maintain a log of persons working on the project site.
- 5) KCA employees and subcontractors may be required to wear identification badges on KCA work sites if the project requirements so demand.

D. Prohibited Materials

The following materials are, in all cases, prohibited on any KCA project site. The items below are not permitted to be located on any project site either in the employee's personal possession or in the employee's vehicle if that vehicle is parked in a KCA controlled work area or site. If these items are found to be in the

possession of a KCA employee on a project site, that person's employment may be immediately terminated. The prohibited materials are:

1. Alcoholic beverages (*beer, wine, liquor, etc.*)
2. Narcotics or other controlled substances (*i.e., drugs*) unless a written prescription by a physician has been provided to the site supervisor PRIOR to bringing the medication to the project site. The site supervisor may, in some circumstances, elect to deny an employee's access to the project site if the prescribed medication could possibly impede the employee's ability to perform assigned tasks in a safe manner.
3. Explosives of any kind, including recreational fireworks.
4. Firearms and/or ammunition of any kind.
5. Concealed weapons
6. Any specific items noted by a KCA client as undesirable in the client's facility or site (*e.g., cigarettes, lighters, loose jewelry, certain types of clothing, etc.*)

E. Telephones and Personal Electronic Devices

- 1) Personal telephones and electronic devices may be restricted on KCA project sites based on the conditions of that site and/or the demands of the KCA client. All KCA employees and subcontractors should request clarification regarding the specific policy for the use of telephones on each project site.
- 2) The KCA site supervisor may demand that no personal telephones be possessed by a KCA employee or subcontractor. If this policy is in force and then ignored, the KCA supervisor can insist that the employee or subcontractor leave the site immediately.
- 3) KCA employees are not permitted to engage in non-work-related telephone discussions (*except emergencies*) while on KCA project sites. The KCA site supervisor may allow for exceptions during break times but permission must, in all cases, be granted by the KCA site supervisor for telephone use during break times while on KCA work sites.

F. Prohibited & Protected Use of KCA Customer Facilities

- 1) KCA employees and subcontractors are prohibited from using customer/client cafeterias, break rooms, kitchens, showers, restrooms, or other similar facilities on a KCA project site without the expressed prior approval of the KCA site supervisor or owner representative. Note that it is never ASSUMED that KCA employees have permission to use an owner's cooking, dining, washing, or restroom facilities. Permission MUST be obtained directly from the KCA site supervisor, who must have obtained permission from the client, before any employee is permitted in these spaces.
- 2) Before beginning any work that could expose KCA employees and subcontractors to injurious corrosive materials, KCA will confirm availability of customer eyewash and quick drenching/flushing stations at customer facilities.

- 3) KCA employees and subcontractors are not permitted to use storerooms and warehouses owned and operated by KCA clients without the prior expressed permission from that owner. KCA employees will receive permission from their supervisor before use of any client-owned storeroom or warehouse.
- 4) KCA employees and subcontractors will never remove any item from an owner's storeroom or warehouse without permission from that owner.
- 5) KCA employees and subcontractors are prohibited from using any equipment, tools, machinery, or supplies (*i.e., ladders, man-lifts, machine shop equipment, welders, gas bottles, hoists, etc.*), without the clearly expressed permission from our owner. In all cases, the KCA employee and subcontractor will request permission from their KCA supervisor prior to utilizing any equipment owned by our client. The KCA supervisor will verify that permission has been given for its use.
- 6) KCA employees and subcontractors shall be restricted to the defined area of work and the assigned path between that area and the point of entrance when working on a KCA client's site or facility.
- 7) No roaming about is permitted on a KCA client's site or facility.
- 8) KCA's client may restrict access to the work area within an existing facility through specific doors or pathways. In all cases, KCA employees and subcontractors will honor the Owner's request to limit access through specific pathways.
- 9) KCA employees and subcontractors will exercise care to close doors and engage locks where appropriate and as demanded by the KCA supervisor and/or client.
- 10) Elevators and other hoisting equipment owned by KCA clients may be used only with prior approval of the client. KCA employees and subcontractors will exercise great care not to overload elevators and hoisting equipment with tools and materials that may exceed the equipment's rated weight capacity.
- 11) The KCA supervisor shall maintain roads and bridges that are utilized for KCA operations such that emergency access by firefighting equipment to the KCA project site is never and in no way obstructed.

G. Shutdowns & Disruptions of KCA Customer Services

- 1) KCA employees or subcontractors shall not shut-off, disrupt, modify, or damage any active service that is maintained by our client without the expressed written authorization from that client prior to commencement of work on that service. Active services that require written permission prior to potentially disruptive activity include:
 - a. Fire alarm systems
 - b. Security systems
 - c. Fire sprinkler & fire suppression systems
 - d. Power (*electrically energized*) systems including emergency generation

- e. Plumbing (*water & sewer*) systems
 - f. Heating, ventilation, and cooling systems
 - g. Data systems (*computers, processing, voice, data, etc.*)
 - h. Owner specific processing systems
 - i. ALL pressurized systems
- 2) KCA clients may demand that written notice for disruptive activities include the date and time of the disruptive action and the estimated date and time the system will be returned to service.
 - 3) In the case of the planned disruption of any active fire suppression system, the KCA supervisor shall ensure that a fire watch is maintained for the duration of time that the fire prevention system is not in working order.
 - 4) KCA employees and subcontractors shall utilize pre-planned strategies and exercise great care each time an active service is disrupted to ensure that the duration of the disruption is kept to a minimum.

H. Automobiles & Parking

- 1) KCA employees who are operating a KCA provided automobile for use on public right of ways, shall AT ALL TIMES operate that vehicle within the legal limits. KCA employees operating KCA vehicles, whether they be owned, leased, rented, or assigned, shall AT ALL TIMES obey all traffic regulations applicable to the operation of that vehicle. Speed limits and traffic control devices will ALWAYS be honored.
- 2) KCA employees who operate a KCA provided automobile will have in his/her possession while operating that vehicle: a valid driver's license suitable for the vehicle being operated, current proof of insurance, and any other registrations and certifications required by the state and/or local governing authority that has jurisdiction.
- 3) KCA employees who operate a KCA provided automobile will AT ALL TIMES use seat restraining devices (*i.e., seat belts*) while operating that vehicle.
- 4) KCA employees who operate a KCA provided automobile will AT ALL TIMES refrain from cellular phone/mobile device text messaging while the automobile is in use.
- 5) KCA employees who operate a KCA provided automobile will immediately report any damage or defects in their automobile should they believe such damage could compromise the safe operation of that vehicle.
- 6) All KCA employees will utilize designated contractor parking lots if the project requirements so demand.

SAFETY REGULATIONS

As a prerequisite to achieving Kuhlke Construction & Associates' (KCA) goal of ensuring a safe and healthy work environment for our employees, all KCA employees and subcontractors are required to accept and obey the following safety rules as they apply to tasks being performed. These regulations itemized below are not intended to be all inclusive. It is impossible to publish a set of rules that covers every potential circumstance that may be encountered. If a rule or policy that might cover a specific hazardous condition is not included in this KCA manual, that omission shall NOT be an excuse for negligence or the failure to use "common sense" in the safe performance of your work. In most cases, common sense and a general awareness of safety will guide the employee in his/her work. Each employee will be solely responsible for completing his/her work safely.

The rules and practices contained in this document are NOT intended to replace OSHA regulations. Rather, they are intended to reinforce and emphasize certain rules, regulations, and practices that are typically encountered in the scope of services provided by KCA. Employees are always required to comply with current OSHA rules and regulations, including the general standards, construction standards, and such safety standards and practices that are common to the trade. Should a conflict be encountered between the OSHA rules and regulations and these KCA safety regulations, the standard that provides the greatest safety to human life shall apply to the task or project.

A. Equipment Operation (Certifications & Training)

Anyone operating applicable mobile (*rolling*) equipment, such as forklifts, cranes, boom lifts, etc., must be trained and/or certified on the proper operation of that equipment. No KCA employee or subcontractor may operate these types of equipment without the applicable and appropriate certification indicating that the proposed operator has successfully completed the necessary training required for the equipment he/she will operate. The KCA Safety Coordinator will maintain a log for each KCA employee indicating what training and certifications that employee has earned. That log will also indicate when his/her certifications may expire and require renewal.

B. Personal Protective Equipment (PPE)

Relevant Reference:

- [*OSHA 29 CFR 1910.132 / General Requirements – Personal Protective Equipment \(PPE\)*](#)
 - [*OSHA 29 CFR 1926.95 - .107 / Subpart E – PPE and Life Saving Equipment*](#)
-

Kuhlke shall provide each KCA employee with Personal Protective Equipment (*PPE*) as needed for the project or task they are assigned, at no cost to the employee. This PPE includes eye protection (*e.g., safety glasses*), face protection (*e.g., face shields*), head protection (*e.g., hard hats*), protective clothing, respiratory devices, and other protective shields and barriers. PPE issued to the KCA employee shall be used only in the manner

it is intended and shall be maintained in a reliable condition. Selected PPE will be fitted to each employee to include proper donning/doffing, cleaning, and maintenance. The employee will be responsible for the care and maintenance of the equipment. KCA will be responsible for assuring employee-owned equipment & PPE of its adequacy, maintenance, & sanitation. It shall be the employee's responsibility to request new PPE from his supervisor should he/she determine that his/her equipment is damaged, worn, or compromised in such a way as to diminish the protection the equipment is intended to provide. No PPE will be used that is found to be defective or damaged. A written hazard assessment will be performed & signed by the supervisor daily to ensure proper use of all applicable PPE.

KCA employees shall be trained in the requirements listed below. The KCA Safety Coordinator will maintain a log for each KCA employee indicating what training that employee has completed. That log will also indicate when his/her certifications may expire and require renewal. The log shall be maintained for the duration of the employee's employment with KCA. This log shall include the identity of the person trained, the signature of the employer or the person who conducted the training, and the date that training was completed. Retraining will be required when workplace changes occur, making earlier training obsolete, the type of PPE changes, or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding.

HEARING PROTECTION

Appropriate hearing protection (*ear plugs, earmuffs, etc.*) shall always be worn by KCA employees and subcontractors when the following conditions exist:

1. When the employee is using or is near equipment and/or machinery that produce sound levels exceeding 85 dB.
2. When in areas so designated by signs which read: "HEARING PROTECTION REQUIRED". Personnel may not be required to wear protection if the equipment is not in operation. Employees will have to verify the requirement for hearing protection with their KCA supervisor in this instance.
3. When required by KCA clients while working on their property.
4. When required by KCA supervisor or foreman.

Note that the KCA supervisor or foreman may elect to waive the requirement that hearing protection be used in certain circumstances where it may be considered a safety hazard to diminish a worker's sensitivity to sound. An example situation might be when a worker is in the proximity of rolling heavy equipment and the worker will need to hear back-up alerts or the sound of other moving equipment.

FOOT PROTECTION

Appropriate shoes shall always be worn at all KCA project sites. Shoes must be maintained in good condition and be suitable for the environment in which the worker is performing tasks.

Sneakers, tennis shoes, running shoes, or other soft sole shoes are prohibited on all KCA project sites.

KCA employees are required to wear impact resistant footwear with “slip resistant” soles.

Footwear with steel toe protection may be required on certain jobsites as the Owner/Client or site/project supervisor deems necessary.

RESPIRATORY PROTECTION

KCA employees and subcontractors exposed to potentially dangerous quantities and/or types of air borne particulates will be required to wear dust masks to minimize and protect against the inhalation of these particulates. The KCA employee will take great care to ensure his/her dust mask fits properly and that it is replaced when the filter becomes saturated with dust. The dust mask will always be worn while working in the presence of excess air borne particulates or when so demanded by the KCA project supervisor or client.

Any task that exposes the KCA employee to air borne contaminants for which fully enclosed (*i.e., self-contained breathing systems*) respiratory protection is required WILL NOT BE PERFORMED BY KCA EMPLOYEES. Such tasks will be subcontracted to a firm specially equipped and trained to perform work with these respiratory protection systems.

HAND PROTECTION

KCA employees are required to wear gloves when demanded by the KCA supervisor or client. Gloves are required to be in good condition and of a type that is suitable for the work being performed.

In some conditions and circumstances the KCA employee may elect not to wear gloves if the task being performed requires a delicate touch for which a gloved hand may hinder, or if wearing the gloves would pose a safety risk. Check with supervisor before removing gloves to perform a task.

HEAD PROTECTION

All KCA employees and subcontractors are required to wear appropriate head protection (*i.e., hard hats*) when demanded by the KCA supervisor or client, or when present or possible hazards require the use of proper head protection. All KCA employees will be trained to recognize what hazards require head protection. Head protection equipment is required to be in good condition and of a type that is suitable for the work being performed.

HIGH-VISIBILITY SAFETY APPAREL

The KCA supervisor, foreman, or client may require that KCA employees and subcontractors wear a high-visibility safety vest or shirt on a particular project site or while engaged in a particular task. If this safety apparel is required, the vest or shirt will

be maintained in good, clean condition, and it will always be worn by the employee and subcontractor while working at the project site.

EYE & FACE PROTECTION

All KCA employees and subcontractors will be required to wear appropriate eye protection (*i.e., safety glasses, face shields, etc.*) AT ALL TIMES while engaged in tasks on KCA project sites.

The employee is required to always keep safety glasses in their possession while on KCA project sites. These safety glasses are to be specifically designed for the protection they are to provide, and they must include side shields.

The KCA employee may be required to wear additional eye (and face) protection equipment depending upon the danger of the task to be performed (*e.g., working with grinding, welding, etc.*). In every case in which the employee is grinding and/or cutting any metal, a full coverage face shield will be worn over the safety glasses.

WELDING APPAREL

KCA employees performing any type of burning, cutting, and/or welding of metals shall wear appropriate protective equipment. This equipment shall always be properly fitted and maintained in good clean condition. Any KCA employee that is burning, cutting, and/or welding shall wear:

1. Welding helmet with face shield and light filter
2. Welder's gloves
3. Respiratory protection, if required by certain tasks
 - a. Check with supervisor or Safety Coordinator for requirements

FALL PROTECTION EQUIPMENT

When KCA employees and subcontractors are working in the proximity of unprotected (*i.e., no safety rails, cables, or walls*) platforms, stairways, or floors that are six feet (6') or greater above the ground, the KCA supervisor will demand that personal protective measures be utilized to assure that fall hazards are minimized to the greatest extent possible. KCA employees will receive training pertaining to the recognition and elimination of fall hazards before initial assignment, and at least annually thereafter. Retraining will also be conducted when there are workplace changes, deficiencies in training, or when fall protection systems or equipment change that render previous training obsolete. All training and retraining will be documented.

KCA employees and subcontractors are required to wear appropriate fall protection equipment (*i.e., harnesses, arrestors, lifelines, etc.*) to ensure he/she is always 100% tied-off when:

1. Working above six feet (6') off the ground on an unprotected (*i.e., no perimeter guard rails*) platform.

2. Working on the platform of an articulating boom lift or other mechanically operated elevated platform, excluding scissor lifts (unless required by customer or client).
3. Working above six feet (6') on a ladder.
4. While working in the proximity of and exposed to falls through floor openings, wall openings, stairways, and ceilings not designed to support live loads (*i.e., suspended lay-in ceilings or areas where a worker may step and fall through a gypsum board ceiling*).
5. Working on a project site where fall protection requirements demand the use of such equipment whether by the client or the KCA supervisor.

Each KCA employee is responsible for ensuring that his fall protection equipment is maintained in good working condition and that connectors, straps, and other vital components are regularly inspected for damage, frays, or other defects that may diminish the effectiveness of the equipment. Any damaged fall protection equipment must be destroyed and replaced immediately.

In the event of a fall, KCA will work with designated plant personnel to facilitate prompt rescue of the affected employee. Supervisor will contact all necessary emergency services and provide first aid or CPR as needed. An accident investigation will be conducted after a fall, near miss, or other serious incident. Site specific plans are not utilized by KCA.

Fall protection shall meet the scope, applications, and definitions outlined in all applicable OSHA standards. As these standards may be amended from time to time, more information can be found at www.OSHA.gov.

C. Noise & Hearing Conservation

Relevant Reference:

- [OSHA 29 CFR 1910.95 / Subpart G – Occupational Noise Exposure](#)
 - [OSHA 29 CFR 1926.52 / Subpart D – Occupational Noise Exposure](#)
-

KCA has established a Hearing Conservation Program to protect worker(s) from the hazards of noise on the job. The OSHA Standard on Occupational Noise Exposure established the permissible limit of noise as 85 dB(A) (decibels), expressed as an eight-hour, time-weighted average, (TWA). This standard allows short-term unprotected noise exposure up to a maximum of 115 dB(A), peak sound. The noise standard requires the identification by personnel monitoring of workers who may be exposed above the 85 dB(A), 8-hour, TWA. Hearing protection is also required for specific activities or using certain types of equipment. The Safety Manager is responsible for overseeing the training of all workers in the company and for monitoring and administering this procedure.

Each new worker whose work exposes them to “excess noise levels” will receive an audiometric test as part of a pre-screening physical examination or within 6 months of a worker’s first exposure at or above the 8-hour Time Weighted Average (TWA) to establish a baseline audiogram against which subsequent audiograms can be

compared. Annually, all workers who are exposed to noise levels exceeding the 85 dB standard will be given a follow-up audiometric examination to monitor for any significant changes in their hearing ability. Workers will be formally notified if there is any change in their hearing as the result of the testing. The Standard has defined this shift as a change in hearing threshold relative to the baseline audiogram of an average of 10 dB or more at 2000, 3000 and 4000 hertz (Hz) in either ear. When audiometric testing is required, each affected worker must not be exposed to any workplace noise for at least 14 hours prior to their test. This requirement may be met by wearing hearing protectors which will reduce the worker's exposure to a sound level of 80 dB (A) or below.

Audiometric tests shall be performed by a licensed or certified audiologist, otolaryngologist, or other physician, by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining, and checking calibration and proper functioning of the audiometers being used. A technician who operates microprocessor audiometer does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist, or physician.

An audiologist, otolaryngologist or physician will review problem audiograms and shall determine whether there is a need for further evaluation. KCA will provide to the person performing this evaluation the following information:

- A copy of the 29 CFR 1910.95 Hearing Conservation
- The baseline audiogram and most recent audiogram of the worker to be evaluated
- Measurement of background sound pressure in the audiometric test room as required in 29 CFR 1910.95 Appendix D
- Records of audiometric calibrations as required by 20 CFR 1910.95 Appendix

If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift as defined by OSHA, the worker will be informed of this fact, in writing, by KCA within 21 days of determination. Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, KCA will ensure that the following steps are taken when a standard threshold shift occurs:

- A worker not using hearing protectors will be fitted with hearing protectors, trained in their use and care, and required to use them
- A worker 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
- Refer the worker for a clinical audiological evaluation or an ontological examination, as appropriate, if additional testing is necessary or if KCA suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors

- Inform the worker of the need for an ontological examination if a medical pathology of the ear which is unrelated to the use of hearing protector is suspected

If subsequent audiometric testing of a worker whose exposure to noise is less than an 8-hour TWA average of 90 decibels indicates that a standard threshold shift is not persistent, KCA:

- Will inform the worker of the new audiometric interpretations
- May stop the required use of hearing protectors for that worker

KCA employees & subcontractors must be trained in the use of personal hearing protection equipment and have access to information and training materials. Each worker must know how to clean and maintain the hearing protection equipment. The training should cover the following:

- The effects of noise on hearing
- The purpose of hearing protectors, the advantages, disadvantages, and the attenuation of various types and instruction on selection, fitting, use and care
- The purpose of audiometric testing, and an explanation of the test procedures
- Access to information and training materials

This training will be required for all workers who are exposed to noise at or above the 8-hour TWA of 85 dB(A). This training will be repeated annually for each worker included in the hearing conservation program, or refreshed sooner as needed.

If KCA suspects that an employee or subcontractor on a jobsite could be exposed to noise at or above the 8-hour TWA of 85 dB(A), KCA will periodically or as necessary, conduct noise level surveys of that jobsite. The results of these surveys will be made available to workers. Any jobsite found to be in excess of the allowable designated noise levels that cannot be brought into compliance with the noise standard will be designated as an area where hearing protectors are to be worn. When signs are posted workers must wear hearing protection. If a client determines that a specific work area is classified as a high noise area, all KCA employees and subcontractors will be expected and required to wear the appropriate hearing protection.

KCA will provide employees with hearing protectors if their 8-hour TWA is above the 85 dB(A). KCA will also make hearing protectors available to all employees exposed to a TWA above 85 dB(A) at no cost to the employee. Any employee who may have a significant threshold shift of hearing level will be required to wear hearing protection if they are exposed to noise TWA of 85 dB(A). KCA will make a concerted effort to find the right protector for each worker – one that offers the right attenuation and is acceptable in terms of comfort.

All supervisors are tasked with the responsibilities to:

- Require hearing protection in all areas with noise levels at or above the 85 dB(A) and for all tasks which generate such noise level (i.e., grinding, hammering). Ear plug shall be required in an area and/or on tasks with the sound levels exceeding 105dB
- Alert workers to possible hazardous noise exposures. Ensure signs are posted in work areas in which the sound levels may exceed 85 dB(A).
- Evaluate the need for engineering and/or administrative controls to reduce the noise levels below the 85 dB(A).
- Make hearing protection available and enforce its use by all workers with TWA exposures at or above the fifty percent (50%) of the OSHA allowable level and/or by those who must enter or work in areas where the noise level is 85 dB(A) or above

D. Heat and Cold Stress

KCA has developed a heat and cold stress policy to address the hazards associated with heat and cold related illnesses.

Heat stress takes place when a body's cooling system is overwhelmed. This can occur when heat combines with other factors such as hard physical activity, fatigue (not enough sleep), dehydration (loss of fluids), and/or certain medical conditions. Heat stress symptoms can include heat rash (itchy red skin), heat cramps (painful muscle cramps), heat exhaustion (high body temperature, weakness or feeling faint, headache, confusion, nausea, and/or vomiting), and heat stroke (no sweating, hot/dry skin, high body temperature, confusions, and/or convulsions). If someone is experiencing heat stroke, immediate medical attention is required. Heat stress can lead to illness or even death. KCA shall take every reasonable precaution to protect its employees from heat stress. When working in hot, humid conditions, the following precautions shall be taken:

- Increase frequency and length of rest breaks
- Provide cool drinking water near workers and remind everyone to drink often
- Caution workers about working in direct sunlight
- Train workers to recognize the signs and symptoms of heat stress. Start a "buddy system" as it's unlikely individuals notice their own symptoms.
- Wear light summer clothing to allow air to move freely and sweat to evaporate. Always wear a shirt to protect from direct sunlight.

Cold stress takes place when the blood vessels in your skin, arms, and legs constrict decreasing blood flow to your extremities. This helps critical organs stay warm, but extremities are at risk of frostbite. Frostbite means that an individual's flesh freezes. Blood vessels are damaged, and the reduced blood flow can lead to gangrene. The first sign of frostbite is skin that looks waxy and feels numb. Once tissues become hard, it becomes a severe medical emergency. Wind chill accelerates heat loss, often to a dramatic extent, and can severely shorten the time it takes for skin to freeze. When your core temperature drops, you're at risk for hypothermia. Early signs of hypothermia include shivering, blue lips and fingers, and poor coordination. Breathing and heart rates

will slow, and you will become disoriented and confused. Hypothermia requires immediate medical attention. When working in cold, windy conditions, the following precautions shall be taken:

- Train workers to recognize the signs and symptoms of cold stress. Start a “buddy system” as it’s unlikely individuals notice their own symptoms.
- Wear several layers of clothing rather than one thick layer.
- Wear gloves if the temperature is below 60°F for sedentary work, 40°F for light work, and 20°F for moderate work.
- Take warm, high-calorie drinks and food.
- If clothing gets wet at 35°F or less, change into dry clothes immediately to prevent hypothermia.
- If you feel hot, open your jacket but keep hat and gloves on.
- Give workers warm-up and rest breaks in heated areas.

E. KCA Hazardous Energies & Lockout/Tagout Program

It shall be the goal of Kuhlke Construction & Associates, Inc. to control hazardous energies in the workplace to the greatest extent feasible. KCA has developed a Hazardous Energies Control and Lockout/Tagout Program to ensure that our employees’ health is protected from hazardous energies in the work environment. The goals & scope that apply to the KCA Hazardous Energies & Lockout/Tagout Program are detailed below.

It is the responsibility of all KCA employees to understand and comply with the lockout/tagout policies. Failure to do so will result in immediate removal from the job site. Injuries to personnel or damage to equipment resulting from non-compliance will result in legal action.

This policy applies to all existing equipment. New equipment during installation shall come under this policy once power has been connected.

1. General Rules

- a. All equipment shall be locked out if personnel are endangered due to the unexpected energization, start-up, or release of stored (*potential*) energy (*e.g., electrical, steam, hydraulic, tension, gravity, etc.*) by the equipment
BE AWARE: Identification tags are not considered lockout devices. They are for identification of the person affixing the padlock only.
- b. **DO NOT REMOVE** any lock or identification tag from any equipment and/or process, except in accordance with the rules under the section of this policy “Procedures for Releasing Locked-Out Equipment”.
- c. **DO NOT ATTEMPT** to operate any switch, valve, or other energy isolating devices bearing locks and tags.
- d. Lockout warning tags shall read “Danger – Locked Out Do Not Operate” and are required for all lockout applications. The “Danger” tag shall be signed by the person applying the lockout device.

2. Procedure for Locking Out Equipment

- a. Contact the Plant Technical Manager or designee associated with the work to determine and locate the person responsible for this equipment or process.
- b. Before locking out a piece of equipment, the following people must be present: the designated customer representative, supervisor of the job, and person performing the work.
- c. After locks & tags have been applied, all stored & residual energy shall be relieved and rendered safe. Verification of isolation shall continue until work is done to ensure there is no re-accumulation of stored energy.
 - 1) A customer representative will be responsible for de-energizing the equipment assuring that all conditions in the facility lockout policy are met.
 - 2) The supervisor and anyone working on the equipment will install an approved lock and ID tag approved by the Plant Technical Manager or designee.
 - 3) If facility personnel are likely to be in danger once the equipment is energized, a multiple lock device is required with both Contractor and facility locks installed.

3. Procedures for Releasing Locked-out Equipment

- a. Before energy is restored to the equipment, a visual inspection of the work area shall be made by the supervisor and personnel performing the work to ensure that all nonessential items have been removed, that all components are operationally intact, and that all personnel are in the clear.
- b. Only the individual who applied the device shall remove each lock and tag device from each energy-isolating device. The only time a lock may be removed by someone other than the affected employee will be if the employee is absent or is incapacitated, at which time the Plant Technical Manager or designee will be notified, and removal of lock will follow customer's policy.

4. Group Lockout/Tagout

- a. Group lockout/tagout shall be utilized when complex LOTO operations involve many employees & numerous energy isolating devices. In these situations, the leading supervisor will act as the primary authorized employee, with the primary responsibility of all Kuhlke employees working under group LOTO.
- b. Group lockout/tagout procedures will be followed per client/customer specifications; the primary authorized employee must coordinate with customer designee to verify steps taken during LOTO operations.
- c. All authorized/involved employees must ensure locks are installed before beginning work on machinery/equipment, and that locks are removed **AFTER** locks from the next shift have been applied, **OR** after work has been completed, tools/materials are free from machinery/equipment, and permission has been given by customer designee to remove locks and restore power.

5. New Electrical Devices Under Construction

- a. New equipment that is installed, but not yet energized, must be locked out with a tag that states, “Under Construction, Not in Service” and includes the Contractor’s name.
- b. These locks and tags must be placed on MCC buckets, disconnect switches, or main disconnects or any similar devices, on equipment or panels.
- c. When the devices are energized, the Contractor regular lock out tags and locks must replace the “Under Construction” tags.

This energy control program will be inspected at least annually for any deficiencies, and to ensure our procedures are being followed and requirements are being met. These periodic inspections will be documented.

KCA employees will be trained on Lockout/Tagout before initial assignment in the field and retrained annually thereafter. Training will cover the recognition of hazardous energy sources, the method & means necessary for energy isolation & control, and the purpose & use of the energy control procedure. Retraining on this program will be required when there is a change in job assignments, machines, energy control procedures, or when a new hazard is introduced. All training will be documented, signed, and certified.

F. Fire Protection

Relevant Reference:

➤ [*OSHA 29 CFR 1926.150 - .155 / Subpart F – Fire Protection & Prevention*](#)

KCA employees and subcontractors will be informed of the proper actions to take in the event of a fire. This includes, but is not limited to, notification and evacuation procedures. KCA must stress that at no time does the task of fighting fire supersede an employee’s primary duties of ensuring their own personal safety, and the safety of others, and reporting the incident to the proper authority and ensuring personal accountability for yourself and all subordinates at the jobsite, in accordance with company and client policy.

The following rules/requirements are demanded of all KCA employees and subcontractors when engaged in any task that necessitates fire prevention/protection:

1. All workers are responsible for good housekeeping practices to enhance fire prevention methods. Supervisors will be held accountable for the housekeeping of their job sites.
2. If applicable, welding machine mufflers will be equipped with an approved spark arresting muffler.
3. Only approved containers will be used during fueling operations. These shall be of the self-closing type.
4. Combustible and flammable liquids shall be handled and stored in approved containers, cabinets, and areas that are designed for fire prevention. All combustible and flammable materials will be handled and stored in compliance with applicable regulations and client requirements. The quantity of flammable/combustible material shall be kept to a minimum on the job site.

5. Oily rags shall be immediately disposed of in designated hazardous waste containers.
6. Use bonding straps to discharge and prevent static charges during transfer of flammable liquids from one container to another.
7. Report all spills or suspicious odors immediately.
8. Fire extinguishers are to be kept in areas easily accessible to workers. Only approved fire extinguishers are to be used. They must have an inspection tag attached and be maintained in a fully charged, ready to operate state. Portable fire extinguishers are to be inspected monthly and annually with documentation supporting the inspection and maintenance schedule. Training is provided to all workers who use or may use fire extinguishers. Fire extinguisher training will include general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.
9. **NEVER** put yourself or others at risk while attempting to extinguish an incipient fire.
10. **DO NOT USE** any fire hoses larger than 1-3/4", unless fully trained as an industrial firefighter.
11. **NEVER** attempt to extinguish a pressurized fuel fed fire.
12. **DO NOT** direct a fire nozzle with a straight stream at any type of LPG fire. This action could extinguish the fire, producing an LPG vapor cloud capable of detonation.
13. **DO NOT USE** fire monitors as the force can damage small equipment and certain high chrome alloy equipment cannot have water applied as cracking could occur.
14. **DO NOT APPLY** water to any acid or caustic release as it can cause a violent reaction. Additionally, low concentration acids or caustics become extremely corrosive, causing an increasing leak condition.

All KCA employees shall be trained on the proper use of fire extinguishers, including a thorough review of the hazards involved in incipient stage fire fighting (see "Training" section – Page 9).

In the event of a fire:

- Remain calm
- Only extinguish a fire when it is clearly within your abilities and the capabilities of the available equipment
- Know the location of the nearest alarm and how to activate the emergency system
- Know the evacuation routes and collection points
- If the fire cannot be extinguished, leave the area immediately and report to your evacuation area
- Await further instructions from the designated responsible personnel

G. Welding, Cutting, Grinding, & Hot Work Permits

Relevant Reference:

➤ [OSHA 29 CFR 1926.350 - .354 / Subpart J – Welding & Cutting](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers associated with the tasks of welding, cutting, burning, and grinding (*Hot Work*) of metals. He/she will emphasize safety, care, and caution while performing this Hot Work. Additionally, he/she will be aware of other people and property in their proximity and take care to protect the safety of both while engaged in these tasks.

The following rules/requirements are demanded of all KCA employees and subcontractors when engaged in welding, cutting, and/or grinding (*hot work*) tasks:

1. Many KCA clients and project sites demand that “Hot Work Permits” be obtained prior to commencement of any welding or burning activities on their site. If such a permit is required, KCA employees and subcontractors will not perform any cutting, welding, burning, or grinding, and/or use open flame or spark-producing equipment until the required permission (*i.e., permit*) is obtained.
2. KCA employees will, prior to any welding, cutting, burning, or grinding, verify if their Hot Work Permit demands that suitable fire extinguishing equipment be available in the immediate area of work. If such equipment is required, the KCA employee or subcontractor will ensure that he/she has the proper type of extinguishing equipment, that the equipment is properly certified, tagged, and charged, and that it is in suitable condition for the purpose it is to provide. All KCA employees will be trained in proper use of fire extinguishers and the hazards involved when using them before beginning work in the field, and at least annually thereafter. Fire extinguishers will be inspected monthly for any deficiencies and will be subjected to an annual maintenance check.
3. Hot Work Permits are only valid for the shift on which they were issued, unless otherwise approved by the KCA client. KCA employees and subcontractors will obtain new Hot Work Permits, if required, at the beginning of each new shift.
4. At all times when KCA employees are welding, cutting, burning, or grinding, a capable employee will be designated for “Fire Watch” while these activities are being performed. The Fire Watch designee will stand at a safe distance from the hot activity while it is being performed and monitor the surrounding area for any potential fire hazard. The Fire Watch designee will not be engaged in any other duties or tasks while he/she is assigned to Fire Watch.
5. The Fire Watch designee is to remain engaged in the safe monitoring of the active site for at least ½ hour following the completion of hot work activity. Additionally, he/she will continue to monitor the hot work area through his/her lunch break or after the normal completion of his/her shift, if applicable, for at least ½ hour to ensure that no potential fire hazard exists following the completion of any hot work activity.
6. KCA employees and subcontractors engaged in hot work activities will ensure that all persons and property in the proximity of their work are protected from the

hazards associated with the hot work. He/she will erect barricades, safety tape, or use spotters to prevent other people from entering areas where they may be injured. KCA employees and subcontractors performing hot work at elevation will ensure that exposed areas below the work are protected (*i.e., barricaded*) such that no person or property is injured or damaged by the hot work activity above.

7. KCA employees and subcontractors may be required to erect welding curtains or light shields around the welding arc to protect others from exposing their eyes to the intense light generated by the welding arc.
8. KCA employees and subcontractors engaged in hot work will be properly trained and have knowledge of all safety rules and standards associated with hot work activities.
9. Anyone performing hot work will, in all cases, wear the proper personal protection equipment (PPE) suitable for the work being performed. See previous section on PPE.

All practices and procedures utilized by KCA employees or subcontractors to weld, cut, burn, or grind metals of any kind shall meet or exceed all applicable OSHA standards. KCA employees will acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (*i.e., www.OSHA.gov*) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

H. Confined Spaces

Relevant Reference:

➤ [OSHA 29 CFR 1926.146 / Permit-required Confined Spaces](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers associated with working in confined spaces. **KCA employees are prohibited from entering or working in confined spaces, UNLESS a suitably trained, certified, and experienced company has been hired for monitoring and rescue services.**

A “Confined Space” is any space that meets all the following conditions:

1. Is large enough for a worker to enter fully and perform the assigned task
2. Is not designed for continuous occupancy by the employee
3. Has a limited or restricted means of entry and exit

All practices and procedures utilized by KCA employees or our subcontractors to perform work in confined spaces shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (*e.g., www.OSHA.gov*) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

I. Overhead Work

KCA employees and subcontractors will recognize and acknowledge the inherent dangers associated with the performance of our tasks from elevation. He/she will emphasize safety, care, and caution while engaged in any work from an elevated platform where persons or property below could be injured or damaged from falling objects or debris.

KCA employees and subcontractors will take necessary precautions to protect personnel in an area where ladders, scaffolds, lifts, or other platforms are being used to perform work above people or property. Physical barriers, trestles, warning lights, observers, or flagmen will be required to limit access to areas where injury or damage may occur due to the activity being performed from elevations. All KCA employees and subcontractors will be required to wear appropriate hard hats where overhead work, and its associated hazards, is taking place.

All practices and procedures utilized by our subcontractors to perform work from an elevated (*overhead*) platform shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

J. Rigging Material Handling

Relevant Reference:

➤ [OSHA 29 CFR 1926.251 / Rigging Equipment for Material Handling](#)

KCA employees and subcontractors will recognize and acknowledge the hazards involved in working with and around rigging materials and equipment. The following safety measures will be taken to prevent, eliminate, or control these hazards as best as possible:

1. All rigging equipment shall be inspected prior to use & on each shift as necessary during its use to ensure it is still in safe, working order.
2. Rigging found to be defective or damaged shall be immediately removed from service and tagged out.
3. When rigging equipment is not being used, it shall be removed from the immediate work area.
4. Rigging equipment shall not be loaded in excess of its recommended safe working load.
5. Tag lines shall be used with all rigging materials/equipment.
6. Supervisors will ensure latches are in place on all hooks, thus eliminating the hook throat opening.
7. No employees will be allowed under a suspended load.

All practices and procedures utilized by our subcontractors to perform work from an elevated (*overhead*) platform shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (*e.g.*, www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

K. Electrical Work

Relevant Reference:

- [OSHA 29 CFR 1910.332 / Training - Electrical](#)
 - [OSHA 29 CFR 1926.400 / Subpart K – Electrical](#)
-

KCA employees and subcontractors will recognize and acknowledge the inherent dangers associated with working in the proximity of electricity. He/she will emphasize safety, care, and caution while performing work around energized electrical devices such as wires, cables, fixtures, breakers, receptacles, switches, capacitors, etc.

Employees will be trained & familiar with all electrically related safety practices, including those listed below, and in safety related work practices that pertain to their respective job assignments.

The following rules/requirements are demanded of all KCA employees and subcontractors when working around electrical components:

1. All electrical work, of any kind, performed by KCA employees or subcontractors shall be in accordance with the pertinent provisions of NFPA 70 (*latest revision*) and area classifications.
2. The construction and installation of permanent and temporary electrical power transmission and distribution services shall comply with all applicable OSHA standards.
3. All persons are required to comply with applicable OSHA regulations and standards while working near live electrical components.
4. Exposed, de-energized parts that have not yet been locked/tagged out will be treated as being live by KCA employees and subcontractors, and no work will be performed until lockout/tagout is complete.
5. If access to an area containing exposed energized parts is required, supervisor will ensure adequate illumination is provided that allows employees and/or subcontractors to work safely.
6. KCA employees and subcontractors will follow all safety rules and regulations when working on or near exposed, energized parts. Supervisor is responsible to ensure that all proper precautions are taken to minimize, reduce, or eliminate hazards.
7. Precautions shall be taken to assure that any exposed wiring devices and/or conductors are protected from access by unqualified personnel. Only qualified persons may work on energized parts.

8. Any KCA employees or subcontractors performing work in the vicinity of overhead lines must maintain the appropriate clearance distances as found in Table S5 of the Electrical Subpart (S) of Part 1910, if the lines have not been de-energized and grounded.
9. All unqualified employees and subcontractors shall maintain a safe clearance distance (at least 10') from energized overhead lines when working in an elevated position, and while operating vehicular and mechanical equipment.
10. All electrical equipment on KCA project sites shall always be properly grounded. This requires that extension cords and/or drop cords have an intact grounding conductor, a grounding plug/pin, and a grounded receptacle. Any cords with broken or damaged grounding plugs/pins or conductors shall be repaired by a qualified technician or destroyed immediately upon discovery.
11. KCA will not permit the use of damaged electrical cords on project sites. Any electrical cords that exhibit damaged sheathing, exposed conductors, or broken connectors shall be replaced, repaired by a qualified technician, or destroyed immediately upon discovery.
12. Any work to be performed in an energized substation or electrical building may require that the KCA client/customer issue a permit for that work. If a permit is required, KCA employees and subcontractors will always comply with the requirements and provisions of that permit.
13. Any work on existing energized electrical circuits shall be closely coordinated with the KCA client. Under no circumstances will a KCA employee permit any circuit that has been open (*i.e., de-energized*) for maintenance be closed (*i.e., energized*) without the expressed prior approval and consultation with the KCA client.
14. Conductive apparel or PPE shall not be worn while performing electrical work of any kind, unless the item(s) are rendered non-conductive by covering, wrapping, or insulating
15. KCA shall protect all areas where work is being performed on energized electrical equipment and/or conductors. Protection measures include barricades, warning signs, monitors, etc. A KCA supervisor must always be present when work is being performed on energized electrical equipment and/or circuits.
16. Protective shields, protective barriers, or insulating materials shall be used as necessary when working in confined or enclosed workspaces where electrical hazards may exist.
17. All temporary electrical power services utilized on KCA project sites shall be Ground Fault protected. All electrically powered hand operated tools shall be protected by ground fault circuit interrupters (*GFCI's*).

All 120-volt, single phase, 15 and 20 ampere receptacle outlets on the job site, which are not part of the permanent wiring of the building or structure and which are in use by workers, shall have approved ground fault circuit interrupters for worker protection. Receptacles on a two wire, single phase portable or vehicle mounted generator rated

not more than 5kw, where the circuit conductors of the generator frame and all other grounded surfaces, need not be protected with ground fault circuit interrupters.

Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug, except cord sets and receptacles which are fixed and not exposed to damage shall be visually inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage. Any equipment found damaged or defective shall not be used until repaired. Damaged or defective items shall be tagged "DO NOT USE" and removed from service until repaired and tested.

All equipment grounding conductors shall be tested for continuity and shall be electrically continuous. Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor to its proper terminal. These tests shall be performed before first use, before the equipment is returned to service following any repairs, before the equipment is used after any incident which can be reasonably suspected to cause damage, and at intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months. Any equipment that does not meet the testing requirements will not be made available and will not be permitted to be used by any workers.

All practices and procedures utilized by our subcontractors on material or equipment that is electrically energized or is intended to be electrically energized shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (*e.g.*, www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

L. Excavations & Trenches

Relevant Reference:

➤ [*OSHA 29 CFR 1926.650 / Subpart P - Excavations*](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers associated with working in open excavations and trenches. He/she will emphasize safety and care, and take necessary precautions while performing work in, or causing other to be exposed to falls or collapses of, open excavations, pits, and trenches.

The following rules/requirements are demanded of all KCA employees and subcontractors when working in and around excavations and trenches.

1. Prior to any digging, excavating, or trenching activity, the KCA supervisor shall verify, or cause to be verified, the existence and location of any energized underground utility services. KCA employees will, if required, call for a certified utility location survey prior to beginning any excavation.

2. KCA employees will always protect the perimeter of any open and unattended excavations and trenches with barricades, high visibility warning tape, and/or warning lights to prevent a pedestrian from walking into the excavation. KCA employees will always ensure that adequate barricades and warnings are erected around open excavations and trenches if they are to remain open during the night.
3. All excavated and stored materials (*i.e.*, *soils*) shall be placed no closer than two feet (2') from the edge of the trench.
4. Any person working inside a trench, pit, or excavation that is four feet (4') or greater in depth must always be provided with a safe means of egress that is located within twenty-five feet (25') of that person. Such means of egress include a ladder, stair, ramp, or other means to quickly evacuate the trench.
5. Any trench that is five feet (5') or deeper must be adequately protected (*as defined in OSHA 1926.650*) from collapse when any person is working inside the trench and exposed to a cave-in. Possible protection methods include sloping back the trench walls, or shielding (*i.e.*, *trench box*) the trench walls. The suitable methods and practices for safely working in and around excavations and trenches are detailed in the OSHA section noted above.
6. If a trench is six feet (6') or greater in depth, the trench perimeter must be protected by a rigid and stable guardrail system.

All practices and procedures utilized by KCA employees and subcontractors that are related to excavations and trenching shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (*e.g.*, www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

M. Unattended Work Areas & Housekeeping

In no case will KCA employees or subcontractors leave any job site or work area unattended in which a potentially dangerous condition or hazard exists. KCA employees will exercise great care, caution, and common sense to ensure that all persons and/or property are protected from harm, injury, or damage should they intentionally or unintentionally occupy the site or work area.

KCA employees and subcontractors will maintain the project site and/or their work area in a clean condition that is free of debris, trash, excess materials, and/or other unnecessary objects and material that could encumber the free movement of people and equipment in a safe and healthy manner.

Emergency passageways and door openings will always be kept clear of trash, debris, and other obstacles.

N. Signs, Signals & Barricades

Relevant Reference:

➤ [OSHA 29 CFR 1926.200 / Subpart G – Signs, Signals & Barricades](#)

KCA employees and subcontractors will recognize, acknowledge, and accept the necessity to identify potential workplace hazards with appropriate barricades, signs, and signals to protect persons and/or property. At locations where potential hazards exist (e.g., *overhead work, excavations, etc.*), KCA employees shall be responsible for posting, installing, and maintaining signs, signals, and barricades to detour the passage of persons and/or vehicles.

The following rules/requirements are demanded of all KCA employees:

1. Barricades used to protect an area against unintended access should be erected 42" high, square, and level. These barricades should be established at least four feet (4') away from the edge of any excavation, hole, platform, and roof where the potential for falls exists.
2. KCA employees will display "DANGER" signs or tags in clearly visible locations to warn anyone around potential or immediate safety hazards.
3. KCA employees will always observe and obey all signs, signals, and barricades that are posted to warn of potential or existing safety hazards.
4. The selection and use of warning signs and tags shall be in conformance with ANSI D6.235.1 and ANSI D6.235.2.
5. KCA employees or subcontractors who are given the task of flagging (*i.e., flagmen*) for signaling or warning purposes shall wear a high-visibility vest with light reflective material.

KCA employees and subcontractors are responsible for ensuring that signs, signals & barricades used to identify potential dangers and hazardous conditions comply with applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

O. Elevated Working Platforms / Aerial Lifts

Relevant Reference:

➤ [OSHA 29 CFR 1926.453 / Subpart L - Scaffolds](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers of working from a motorized, mechanical, and elevated platform such as JLG's and scissor lifts. KCA will require that anyone operating such equipment is properly trained in the proper and safe operation of these types of equipment.

The following rules/requirements are demanded of all KCA employees:

1. No KCA employee is permitted to control or operate this type of equipment without the necessary training and certification to do so. Only authorized persons shall operate an aerial lift on KCA projects.
2. All persons working in aerial lifts shall always stand firmly on the platform floor and will not sit or climb on the edge of the basket or use planks, ladders, or other devices for work position.
3. KCA employees will not tie-off an aerial lift to an adjacent pole, structure, or other equipment.
4. KCA employees and subcontractors shall not use cellular phones/mobile devices in any way while operating an elevated working platform or aerial lift.
5. All persons working in an aerial lift (*excluding scissor lifts, unless required by supervisor or client*) will wear a harness with a lanyard that is firmly attached at all times to an approved anchorage point while working on/in the lift.
6. The boom and/or basket load limits specified by the manufacturer shall not be exceeded.
7. No KCA employee or subcontractor shall be permitted to utilize a personnel basket for any reason.

The KCA Safety Coordinator shall keep a log of all KCA employees indicating who has been properly trained and certified to operate this type of equipment and when those certifications require renewal. The Safety Coordinator will be responsible to ensure that employees are notified if their certifications are nearing expiration and assist or provide the KCA employee with the necessary renewal.

All practices and procedures utilized by KCA employees and subcontractors that are associated with the use of aerial lifts shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (*e.g., www.OSHA.gov*) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

P. Scaffolding

Relevant Reference:

➤ [OSHA 29 CFR 1926.450 / Subpart L - Scaffolds](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers of working from scaffolds. KCA will require that anyone erecting or using scaffolding on KCA project sites be familiar with and fully comply with the OSHA standards referenced above.

Training will include the hazards involved in using scaffolds, fall protection, proper use, and load capacities. Retraining will be required when a hazard is introduced that previous training did not cover or if there are inadequacies in an affected employee's work that indicate retraining is necessary.

Scaffold inspections will be completed by a competent person prior to use, and tags must be used if any scaffold is found to be defective or unsafe.

All practices and procedures utilized by KCA employees and subcontractors that are associated with the use of scaffolds shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

Q. Ladders

Relevant Reference:

➤ [*OSHA 29 CFR 1926.1053 / Subpart X – Stairways & Ladders*](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers of working from ladders. KCA will require that anyone working from or utilizing ladders on KCA project sites be familiar with and fully comply with the OSHA standards referenced above.

The following rules/requirements are demanded of all KCA employees:

1. All ladders utilized by KCA employees or subcontractors shall not be defective or damaged in any way. Supervisors shall visually inspect their ladders periodically to ensure they are safe to use. Defective ladders shall be immediately destroyed or removed from the KCA project site.
2. Portable ladders with conductive side rails will not be used.
3. Ladder rungs must be uniformly spaced to meet OSHA/ANSI specifications.
4. Only ladders with the correct load capacity for the task shall be used.
5. Extension ladders should be placed at such an angle so that the base of the ladder is at least one foot (1') away from the vertical support surface for every four feet (4') in ladder height.
6. The top of an extension ladder shall always be tied off to the structure it is resting against. It must also extend at least three feet (3') above the structure it is resting against when used to reach the top of a platform, roof, etc.
7. The top or top step of a step ladder shall not be used.
8. All persons on ladders shall use at least one hand to grasp the ladder when progressing up or down the ladder.
9. No person shall carry any load or object up or down a ladder that could cause that person to lose balance and fall.

All practices and procedures utilized by KCA employees and subcontractors that are associated with the use of ladders shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

R. Compressed Gas Cylinders

Relevant Reference:

➤ [OSHA 29 CFR 1926.350 \(a\) & \(b\) / Subpart J – Welding & Cutting](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers of working with compressed gas cylinders. KCA will require that anyone handling or maintaining compressed gas cylinders be familiar with and fully comply with the OSHA standards referenced above.

The following rules/requirements are demanded of all KCA employees:

1. Acetylene gas shall not be used at pressures exceeding fifteen (15) pounds per square inch (*PSI*).
2. Compressed gas cylinders shall not be stored overnight in a client's facility without the expressed approval of the Plant Technical Manager or designee. Burning carts with compressed gas cylinders must be kept in appropriate spaces as directed by and with the permission of the Plant Technical Manager or designee. Hoses must be neatly coiled on the cart and regulator valves must be in a closed position.
3. Compressed gas cylinders must always be secured in an upright position. A chain or other steadying device shall be used to prevent the cylinder from being knocked over while in use.

All practices and procedures utilized by KCA employees and subcontractors that are associated with the use of compressed gas cylinders shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (*e.g.*, www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

S. Powered Industrial Trucks / Forklifts

Relevant Reference:

➤ [OSHA 29 CFR 1910.178 & Appendix A / Powered Industrial Trucks](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers of working in and around forklifts, fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines. KCA will require that anyone operating or maintaining such equipment be familiar with and fully comply with the OSHA standards referenced above.

The following rules/requirements are demanded of all KCA employees:

1. KCA shall require any employee authorized to operate a powered industrial truck be competent to do so in a safe manner. Only KCA employees who have been appropriately trained and certified shall be authorized to operate such equipment.
2. KCA employees and subcontractors shall operate and maintain these Powered Industrial Trucks only in the manner that they were intended. The operator shall

ensure that the equipment is properly maintained. Additionally, he/she will be responsible for cleaning any hydraulic fluids or oils that may have spilled from the equipment. Any equipment exhibiting fluid leaks will immediately be removed from a KCA site and repaired.

3. When operating any equipment with a forked lifting device, the forks shall not be more than four inches (4") above the floor when traveling, unless additional height is necessary to clear obstructions or uneven surfaces. Additionally, loads carried on forks shall be tilted back slightly to stabilize the load.
4. Loads carried on Powered Industrial Trucks shall not exceed the capacity specified by the manufacturer.
5. Fuel flow to the engine of propane, LP, or natural gas-powered equipment shall be shut-off via a control valve when the equipment is not in use.
6. The forklift operator is responsible for verifying that all trailer chocks, supports, and dock plates are in place prior to loading/unloading.
7. KCA employees and subcontractors shall not use cellular phones/mobile devices in any way while operating a powered industrial truck or forklift.
8. Equipment owned by KCA shall have an inspection log attached indicating the appropriate inspections have occurred by the operator prior to each new shift. These inspection logs are to be completed by the operator for each shift in which the equipment is in operation.
9. Any Powered Industrial Truck/Forklift observed to be defective or not safe to operate will be immediately shut down, parked, and tagged out until the necessary repairs can be completed.
10. No KCA employee or subcontractor shall be permitted to utilize a personnel basket for any reason.

Industrial Truck/Forklift training shall be conducted with the package developed by SafetyHead, Inc. This training is provided by a qualified instructor and includes formal instruction, practical training, and operator evaluation. Re-evaluation and recertification will occur every 3 years.

The KCA Safety Coordinator shall keep a log of all KCA employees indicating who has been properly trained and certified to operate Powered Industrial Truck/Forklifts and when those certifications require renewal. The Safety Coordinator will be responsible for ensure that employees are notified if their certifications are nearing expiration and assist or provide the KCA employee with the necessary renewal.

All practices and procedures utilized by KCA employees and subcontractors that are associated with the use of Powered Industrial Trucks shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

T. Hand & Power Tool Safety

Relevant Reference:

➤ [*OSHA 29 CFR 1926.300 / Subpart I – Tools – Hand & Power*](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers of working with certain types of tools that can cause injury. KCA will require that anyone operating and/or maintaining hand or power tools shall be familiar with and fully comply with the OSHA standards referenced above.

The following rules/requirements are demanded of all KCA employees:

1. KCA employees and subcontractors will not leave any such tools on step ladders, scaffolds, or roofs where the tool might be able to be dislodged and fall to the ground, potentially injuring persons below.
2. No KCA employee or subcontractor shall use compressed air to clean any part of a person's body or clothing.
3. KCA employees and subcontractors shall operate and maintain power and hand tools only in the manner that they were intended. The operator shall ensure that their tools are properly maintained. Additionally, he/she will be responsible for ensuring that safety guards and devices provided with the tool being used are properly attached and functional.
4. KCA employees and subcontractors will wear appropriate PPE when operating power or hand tools (*see previous section*).
5. Any tool observed to be defective or not safe to operate will be immediately removed from service, tagged out, and/or discarded. No KCA employee or subcontractor will operate a tool that is found to be defective or not safe to operate.

The following ergonomic guidelines shall be applied in regard to tool selection in order to improve safety and decrease injuries:

1. Use the right tool for the job, and the right tool for the user.
2. "Bend" the tool, not the wrist.
3. Avoid high contact forces and static loading where possible.
4. Reduce excessive gripping force or pressure.
5. Avoid extreme and awkward joint positions.
6. Avoid twisting hand and wrist motion by using power tools rather than hand tools.
7. Avoid or reduce repetitive finger movements.
8. Minimize the amount of force needed to activate trigger devices on power tools.
9. Use two or three finger triggers for power tools and avoid thumb triggers; use four finger triggers only when the tool is properly balanced

The use of pneumatic tools involves exposure to particular hazards not associated with standard hand and power tools. The main associated hazard is the danger of being hit

by a tool attachment or fastener being used with the tool, due to being powered by compressed air. Anyone using pneumatic tools shall check to see that they are securely fastened to the hose to prevent them from becoming disconnected. A locking device attaching the air hose to the tool will serve as an added safeguard. A safety clip or retainer must be installed to prevent attachments, such as a chisel on a chipping hammer, from being unintentionally shot from the barrel. Screens must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills. Compressed air guns should never be pointed toward anyone and should never be “dead-ended” against the user or another worker.

Powered abrasive grinding, cutting, polishing, and wire buffing wheels create special safety risks because they may throw off flying fragments while in use. Before an abrasive wheel is mounted, it should be closely inspected, and sound or ring tested to be sure that it is free from cracks and/or defects. To prevent an abrasive wheel from cracking, the user should be sure it fits freely on the spindle. The spindle nut must be tightened enough to hold the wheel in place, without distorting the flange. Manufacturers’ recommendations must be followed. Care must be taken to ensure the spindle wheel does not exceed the abrasive wheel specifications. Due to the possibility of a wheel disintegrating or exploding during start-up, no one should stand directly in front of the wheel as it accelerates to full operating speed. Portable grinding tools shall be equipped with safety guards to protect workers from the moving wheel surface and from flying fragments due to breakage.

All practices and procedures utilized by KCA employees and subcontractors that are associated with the use of power tools or hand tools shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to these activities.

U. Powder-Actuated Tools

Relevant Reference:

➤ [OSHA 29 CFR 1926.302\(e\) / Subpart I – Tools – Hand & Power](#)

KCA employees and subcontractors will recognize and acknowledge the inherent dangers of working with powder-actuated fastening devices. KCA will require that anyone operating and/or maintaining powder actuated tools be familiar with and fully comply with the OSHA standards referenced above.

The following rules/requirements are demanded of all KCA employees:

1. KCA employees and subcontractors will wear appropriate PPE when operating powder-actuated tools (see previous section). Eye protection **MUST** be worn by the operator and anyone near the tool.
2. The tool operator shall ensure that the area in which the tool is being used is clear of obstruction (*behind and below surface being impacted*) during its use and that no persons who are not necessary to the work being performed are in such proximity that they may be injured by flying debris.

3. Only persons who have been trained in the proper and safe operation of a particular tool shall be permitted to operate a powder-actuated tool.
4. Any tool observed to be defective or not safe to operate will be immediately removed from service, tagged out, and/or discarded. No KCA employee or subcontractor will operate a tool that is found to be defective or not safe to operate.

All practices and procedures utilized by KCA employees and subcontractors that are associated with the use of powder-actuated tools shall meet or exceed all applicable OSHA standards. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to the use of these tools.

V. KCA Hazard Communication Program

It shall be the goal of Kuhlke Construction and Associates, Inc. to ensure that the hazards of all chemicals imported to and/or stored on KCA project sites or facilities are evaluated and that information concerning hazards associated with those chemicals are transmitted to our employees. This transmittal of information is to be accomplished by means of our hazard communication program.

W. First Break Line

Before breaking any flange on any line pipe, vessel, or tank, the site supervisor must contact the appropriate Plant Technical Manager or designee and check that precautions have been taken to isolate the work and to ensure that it is free of any hazardous substance. Once the last substance contained has been identified, the site supervisor will ensure that all personal protective equipment required for that substance is used until the breaking is complete.

X. Blood-borne Pathogens

Relevant Reference:

➤ [OSHA 29 CFR 1910.1030 / Blood-borne Pathogens](#)

KCA employees and subcontractors will recognize and acknowledge the dangers of all occupational exposure to blood or other potentially infectious materials. Access to a copy of this exposure control plan is available from site supervisors and from the Safety Coordinator. Training on blood-borne pathogens will be conducted before initial assignment and within 1 year of previous training. These training records will be kept for no less than 3 years. KCA will require that our employees be familiar with and fully comply with the OSHA standards referenced above.

The following rules/requirements are demanded of all KCA employees:

1. KCA employees and subcontractors will take necessary precautions to prevent their contact with another's blood or other potentially infectious materials. All blood will be considered infectious, regardless of the perceived status of the source individual.

2. KCA employees will utilize necessary controls, practices, and engineering to eliminate or minimize potential exposure to blood-borne pathogens.

3. Equipment, tools, surfaces, etc. will be cleaned as necessary after coming into contact with blood or other infectious materials.

All employees who have been identified as having exposure to blood or other potentially infectious materials will be offered the Hepatitis B vaccine, at no cost to the employee. Medical records will be kept for the duration of employment, plus 30 years.

KCA employees and subcontractors will use customer hand-washing facilities if given permission to do so. If permission has not been given, antiseptic solutions and/or towelettes can be found in each supervisor's first aid kit.

All practices and procedures utilized by KCA employees and subcontractors shall meet or exceed all applicable OSHA standards related to prevention of exposure to blood-borne pathogens. KCA employees and subcontractors acknowledge that these OSHA standards may be amended from time to time. The reader shall consult any of the various OSHA information sources (e.g., www.OSHA.gov) on a regular basis to ensure he/she is aware of the most current safety standards that are related to blood-borne pathogens.

Y. First Aid

Relevant Reference:

- [OSHA 29 CFR 1910.151 / Subpart K – Medical & First Aid](#)
 - [OSHA 29 CFR 1926.23 / Subpart C – General Safety & Health Provisions](#)
 - [OSHA 29 CFR 1926.50 / Subpart D – Occupational Health & Environmental Controls](#)
-

Kuhlke Construction and Associates, Inc. (KCA) is committed to the safety and health of workers and is committed to ensuring that prompt medical attention for injuries that occur at work are managed appropriately.

KCA will ensure that every worker receives training that explains first aid procedures. KCA will determine who must be trained to render first aid with the appropriate practices and techniques, including response to site-specific hazards. KCA will ensure the first aid response plan, amount of first aid trained personnel, equipment and all other hazard controls reflect workplace hazards as determined in job hazard analyses and worksite inspections. KCA will ensure first aid kits remain fully stocked and any emergency response equipment is in good condition. All employees and subcontractors are expected to follow the first aid program and to render care as needed, if trained in first aid.

First aid and medical facilities will be made available on-site. In the absence of medical facilities, there shall be a sufficient number (but not less than one) of workers on each shift certified in first aid and CPR to provide adequate first response medical care. Each designated first aider will receive training and will have a valid certificate in first aid training from an authorized organization.

KCA will provide first aid kits and make them available on each job site. These kits are provided for workers' use in the treatment of minor scratches, burns, headaches,

nausea, etc. All workers shall know the location of the first aid kits and shall notify their supervisor if they need to use the first aid kit. If a worker has a work related injury or illnesses that requires professional medical assistance, they shall notify their supervisor as soon as possible. The Safety Manager shall inspect first aid kits before the kits are sent out to each job to ensure each kit has the required amount of supplies. Supervisors shall inspect first aid kits weekly to ensure each kit still has the required amount of supplies. And deficiencies shall be reported to the Safety Manager to be corrected.

For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If a worker sustains an injury requiring treatment other than first aid, they shall inform their supervisor and provide details for the completion of the accident investigation report. In the event a worker accidentally spills or splashes injurious chemicals or liquids on their clothing or body, they shall use the nearest wash facility or eyewash station.

If a worker sustains a severe injury requiring emergency treatment:

1. Injured workers should call for help and seek assistance from a co-worker or supervisor immediately.
2. A trained first aid provider will render emergency first aid and request assistance for transportation to the local hospital emergency room or other resources as needed.
3. Prior to the start of a job, KCA will ensure that arrangements are in place to transport injured workers from the jobsite to the nearest health care facility.
4. If an ambulance is not available, The Company will ensure other appropriate transportation is available to accommodate the injured.
5. Provide details for the completion of the accident investigation report.

Z. KCA Emergency Action Plan

Kuhlke Construction and Associates, Inc. (KCA) employees & subcontractors shall follow each plant's/site's specific emergency action plan(s).

In the event of a facility emergency, Kuhlke personnel shall evacuate the area affected by the emergency and will not interfere with first aid attendants. In the event of a facility wide emergency evacuation, all Contractor personnel shall evacuate the facility/trailers/temporary enclosures and proceed immediately to the defined safe area for a head count by the supervisor.

Any accident on customer property **must be reported in writing within 24 hours** to the project manager or designee.

AA. KCA Accident Investigation & Reporting Program

Kuhlke Construction and Associates, Inc. (KCA) employees shall adhere to the Accident Investigation & Reporting Program below. This program defines the actions our employees must take to provide for a comprehensive investigation of an accident and what reporting procedures are required in the event of an accident.

Formal accident investigations, including the documentation of an accident investigation form, must be conducted whenever an accident occurs. These investigations are performed to keep similar accidents from occurring in the future; they are not performed to find blame or assign fault.

In the event of an accident, emergency medical services should be contacted as needed, followed by reporting the accident to Safety Management.

1. In the event of a workplace accident, injury, or illness, the most important immediate actions are to provide the best assistance possible to those who may need it and to ensure the safety of others who may be affected, or who are acting as emergency responders.
2. Securing of the accident scene is important to ensure a good accident investigation. No movement of material or equipment shall be made until a review of the accident is completed (*securing of equipment or material that could result in further injury may be done*).
3. Obtaining signed statements from witnesses of their complete factual observations is also required. Names and permanent addresses of witnesses shall also be secured for future reference.
4. All accident investigations must be documented using the Accident Investigation Report. This report is to be completed by site supervision and/or the Safety Coordinator.

A review of the accident facts, causes, and actions to prevent recurrence should be documented and communicated to all employees throughout the project via supervisor conducted Daily Work Reports/Job Safety Analyses and Safety Coordinator conducted weekly job visits/safety observations.

Pandemic Worksite Safety & Health Program

At Kuhlke Construction & Associates, Inc. (KCA), we are committed to ensuring the safety and health of our workforce. This requires that we take the appropriate steps to limit the spread of disease/infection from any pandemic. The health and safety of our employees, customers, vendors, subcontractors, and their families are our top priority. This plan will be communicated to all employees giving opportunity for them to provide feedback. Because the evolution of any pandemic is unpredictable and circumstances change frequently, we will continue to update this program to follow construction industry best practices to prevent infection and protect our employees. All employees have the right to refuse unsafe work and retain the obligation to report safety concerns to their supervisor.

Upon recognition of any pandemic, KCA will implement, communicate, and review workplace flexibilities and protocols. We encourage infected employees to stay home. Employees who have tested positive for virus(es) are expected to notify their supervisor and stay home. Employees who have tested negative for virus(es) but who have a family member at home with any infection should notify their supervisor and follow CDC recommended precautions at a minimum. Sick employees should follow CDC recommended practices.

A. Pandemic Compliance Officer & Compliance Monitoring

Once a pandemic is established by governing authorities, the Safety Manager will designate a Pandemic Compliance Officer (PCO) to ensure that KCA and all subcontractors are in full compliance with the protocols and policies established here. The PCO will perform risk assessments, make company policy recommendations, and implement guidelines as deemed appropriate to combat the spreading virus. The PCO will use an array of public health guidance, including, but not limited to, OSHA, NIOSH, the CDC, and the industrial hygiene hierarchy of controls to eliminate, isolate, and mitigate hazards on the worksite. The PCO will work with management to ensure an adequate level of cleaning supplies, tissues, paper towels, hand sanitizer, first-aid supplies, face coverings, personal protective equipment (PPE), and other items needed to implement this policy are available on the worksite. Additionally, the PCO will perform audits of worksite conditions and practices to ensure that all company guidelines are being followed. The outcome of these audits will be documented and kept on file for review.

B. Pandemic Screening and Assessment Protocols

KCA will institute worker screening and assessment protocols for everyone who enters a workspace controlled by KCA, including employees and visitors (e.g., vendors, inspectors, subcontractors, and state officials). The PCO will ensure these screenings and assessments occur before employees and visitors gain entry to a KCA workspace. Screening and assessment protocols may include a visual scan, a temperature check, self-certification, or a questionnaire regarding symptoms and exposure or a combination of the above.

The PCO will choose appropriate and feasible screening and assessment protocols based on the conditions of the worksite (see *Appendix A – Conducting Workplace Screenings and Assessments*). The PCO will communicate these protocols clearly to all employees and subcontractors prior to their implementation.

C. Critical Infrastructure Employees

In the case of a pandemic, governing authorities may permit or encourage critical infrastructure workers to continue their work following a potential exposure, provided they remain asymptomatic and additional precautions are implemented to protect them and their community.

For critical infrastructure workers who have had a potential exposure but remain asymptomatic, the PCO will demand adherence to the following practices prior to and during their work shift:

- **PRE-SCREENING**: Measurement of the employee's temperature and assessment of symptoms prior to starting work. If possible, temperature checks will happen before the employee enters the facility.
- **SOCIAL DISTANCING**: The employee will maintain recommended physical-separation from other workers and practice social distancing as work duties permit while in the workplace.
- **SELF MONITORING**: If the employee remains asymptomatic, the employee will self-monitor and be under supervision.
- **CLEAN & DISINFECT WORKSPACES**: Clean and disinfect all equipment and areas such as trailers, bathrooms, common areas, and shared tools
- **MASKING**: If required (per CDC guidelines and/or customer), the employee will always wear an appropriate face mask while in the workplace

If any critical infrastructure employee becomes symptomatic during the workday, he/she will be sent home immediately. Surfaces in their workspace will be cleaned and disinfected. The PCO will create a list of persons who were exposed to the sick employee during the time the employee had symptoms and two days prior to becoming symptomatic. Others at the facility with close contact (per CDC guidelines) to the employee during this time may be considered as being exposed. These workers will follow exposure protocols detailed in Appendix A – Conducting Pandemic Workplace Screenings and Assessments.

D. Worker Hygiene Policy

Good hygiene and infection control practices will be followed according to CDC guidelines. Employees are required to frequently wash hands with soap and water for at least 20 seconds or use hand sanitizer when soap and water are not available.

Workers will adhere to the following handwashing practices:

- Upon arriving at the workplace and before going home at the end of the day
- Before and after eating
- Between tasks
- After using the toilet

Employees are required to practice good cough/sneezing etiquette – cover their mouth and nose during coughs and/or sneezes and use their sleeve or elbow when tissues are not available. Employees will not use their hands to cover coughs and sneezes and will avoid touching their eyes, nose, and mouth as much as possible.

E. Workplace Sanitation

KCA will institute a regimen of frequent cleaning and disinfection of high-touch surfaces, including, but not limited to, toilets, machinery, tools, PPE, handles, touch screens, smartphones, doors, doorknobs, railings, laptops, and furniture. EPA-approved cleaning disinfectants will be used. Disinfectants will be allowed to saturate surfaces for a minimum time of one minute to adequately disinfect them. Regular cleaning and disinfecting of all common and meeting areas will occur at least once and preferably twice a day. The PCO will ensure there is a schedule for cleaning, sanitizing, and stocking of all restroom facilities, porta-potties, and handwashing stations. In addition, workers must clean and disinfect all machines, tools, or vehicles before use.

All employees performing sanitation and disinfecting will:

- Wear PPE per CDC guidelines. This may include N95 respirators or similar (if a respirator cannot be obtained because of PPE shortages, a facemask or covering will be worn until a respirator can be obtained), disposable gloves, protective clothing, and eye protection
- Discard gloves after each cleaning
- Clean dirty surfaces using a detergent or soap and water prior to disinfection
- Be trained on safe donning, doffing, and disposal of PEP to avoid infectious disease transmission
- Clean hands immediately after PPE is removed
- Be aware of the differences between dust masks and N95s. Dust masks do not reliably protect the wearer from airborne respiratory droplets.

F. Physical/Social Distancing

KCA will practice physical (also called social) distancing by limiting person-to-person contact per CDC guidelines. All employees will follow the guidelines at the workplace, whether indoors or outdoors.

General guidelines include:

- Instituting a “No Congregation” policy to maintain physical distancing during breaks and when eating
- Always practicing physical distancing, including at crew meetings/toolbox talks. Toolbox talks will be conducted outdoors when possible

- Limiting face-to-face meetings per CDC guidelines. As much as possible, meetings between office staff will be conducted via conference call or other virtual meeting tools. Meetings at the jobsite or requiring in-person discussion will be held outdoors if possible
- Eliminating coffee and lunch trucks and the use of centralized gathering or eating areas. All employees are advised to bring their own food, drink, and utensils
- Adjusting meeting and lunchroom seating to eliminate large gatherings. Small break areas will be used with limited seating. If break areas cannot be adjusted, employees will take steps to follow CDC guidelines
- Reviewing and adjusting project schedules to allow complying with CDC guidelines, including arranging for staggered shifts or longer break times so employees can maintain distance during breaks, including lunch.
- Practicing physical distancing during travel times to and from worksites, during travel time at the worksite, and when making deliveries to worksites
- Supplying employees with facial coverings and PPE according to the risk and job task (e.g., face mask, gloves, and eye protection) in work conditions where the CDC distancing guidelines are impossible to achieve

G. Personal Protective Equipment (PPE)

KCA may implement a mandatory face covering policy. Although not recognized as PPE, surgical masks and facial coverings will also be permitted. This policy will be continually reviewed and updated according to the specific risks encountered on the jobsite and CDC guidelines.

All appropriate and required PPE will be provided to employees. The decision to provide specific PPE (e.g., gloves, protective clothing, eye protection, etc.) to protect against infection will follow a risk assessment conducted by the PCO.

H. Training

All employees will receive training regarding this policy and exposure control. This training will include the signs and symptoms of pandemic illnesses, how to minimize exposure and transmission, the reasons for staying home from work when sick, and how to use safety supplies and PPE.

I. International Travel

All international travel activities will be terminated, and future travel activities will be postponed until the pandemic is officially declared over by the federal government (CDC). After it has been determined it is safe to travel, international travel will be gradually phased back into our business continuity plan.

J. Regional and Local Travel

KCA will examine our travel policy and modify it based on the specific state or local guidance in the area where work is being performed. If there is significant community spread within a geographic area, non-essential work travel and work-sponsored conferences, trade shows, etc. within that area will be cancelled until further notice. We

will consider the circumstances along the travel route and at the destination of an employee's proposed travel. KCA will abide by any travel restrictions in the destination area and be aware of state or local government policies that may be in place, such as mandatory quarantine upon arrival.

K. Recordkeeping

KCA will follow OSHA's recordkeeping requirements (29 CFR Part 1904) as it relates to recording cases of infection.

L. Communication

In the event of an exposure, KCA will immediately communicate with all parties (including employees, customers, vendors, subcontractors, etc.) whose health and wellbeing may have been impacted by such an event. At the same time, KCA will also strictly follow all ADA and HIPPA privacy rules and guidelines related to protected health information of any individual involved in the exposure.

M. Resources

Recommendations to limit the spread of infections and mitigate the risk to employees may change as public health officials learn more about the virus. KCA may/will adjust our policies to reflect the most recent/applicable CDC recommendations.

Appendix “A”

Conducting Workplace Screenings & Assessments and Contact Tracing

KCA will ensure that employees are screened and assessed daily if they will be visiting or working away from the home office at a remote customer jobsite. This screening and assessment will be given to all employees, visitors, vendors, and subcontractors before they will be allowed to access the remote worksite. This program will utilize screenings, assessments, or both options as determined by the PCO. This document provides guidance on conducting those screenings and assessment. Return to work scenarios for individual employees who have been exposed, experience symptoms, or are advised by their healthcare provider or a local public health official to self-quarantine or self-isolate are also provided.

Screening Method:

Visual Scan and Temperature Check

The screening of all employees, visitors, vendors, and subcontractors through temperature checks and visual scans is one strategy KCA will employ to protect the work environment. Since temperature screening is a time-sensitive process, it will be administered daily immediately prior to each visit to the customer’s worksite.

Temperature Screening Results

Any employee, visitor, vendor, and subcontractor that is given a visual scan and temperature check that presents with a temperature of 100.4°F or greater (per CDC guidelines) will immediately be separated from other people in the workplace, sent home, and advised to contact their healthcare provider.

Assessment Method:

Assessing employees, visitors, vendors, and subcontractors is another strategy KCA will implement to protect the worksite environment. Two possible options for assessing exposure or symptoms of the virus are a questionnaire and self-certification.

The following questionnaire will be given to any individual whose temperature scan is above 98.6°F:

Assessment Questionnaire

Exposure – Have you, or anyone in your household, come in close contact (within six feet) for a prolonged period (15 minutes) with someone who has a suspected or confirmed infection diagnosis?

Symptoms – Are you currently experiencing:

- a. Cough
- b. Shortness of breath or difficulty breathing
- c. Fever
- d. Chills or repeated shaking with chills
- e. Muscle or body aches
- f. Headache
- g. Loss of taste or smell
- h. Sore throat
- i. Runny nose and congestion
- j. Fatigue
- k. Nausea or vomiting
- l. Diarrhea

Status – Are you currently under self-quarantine or self-isolation orders by your healthcare provider or a local public health official?

Travel – Have you recently traveled to/from another state or another country? If so, please provide all details.

Employee: _____

Date: _____

Assessment Results & Scenarios

Assessment Results: No to All Questions

An employee, visitor, vendor, or subcontractor that responds “no” to all questions will be granted access to the worksite and allowed to proceed with their normal workday.

Assessment Results: Yes to Exposure Question

An employee, visitor, vendor, or subcontractor that responds “yes” to exposure, but “no” to symptoms, will be instructed to self-quarantine. According to the CDC, self-quarantine is appropriate when a person feels healthy but recently had close contact for a prolonged period (15 minutes) with an infected person. A person in self-quarantine should do the following:

- Stay home for recommended days based on CDC guidelines
- Practice social distancing
- Check their temperature twice a day
- Self-monitor for symptoms
- Contact their healthcare provider if symptoms develop

Discontinuing Self-Quarantine

While in self-quarantine, the exposed individual may or may not develop symptoms. If this individual does not develop symptoms, they should contact the PCO about returning to work upon completion of their self-quarantine. If the individual does develop symptoms, they should begin self-isolation (see details below) and contact their healthcare provider.

Assessment Results: “Yes” to Symptoms Question

An employee, visitor, vendor, or subcontractor that responds “yes” to symptoms should be isolated from other people in the workplace and, if they are an employee, their supervisor should be notified. Prior to the symptomatic person leaving the premises, the onsite supervisor should determine which individuals may have been exposed and that need to take additional precautions; this process is known as contact tracing. See subsequent section for more information on contact tracing. Note that if an employee is confirmed to have infection, KCA will inform (as required) other employees and KCA individuals of their possible exposure to infection at the worksite but will maintain confidentiality as required by the Americans with Disabilities Act.

The symptomatic person should be sent home, advised to self-isolate and contact their healthcare provider. According to the CDC, self-isolation is appropriate when someone has been diagnosed with infection is waiting for diagnostic test results or has symptoms. A person in self-isolation should do the following:

- Stay in a specific area and away from other people; if possible, use a separate bathroom
- Stay home except to get medical care

- Monitor symptoms and stay in contact with their healthcare provider
- Follow care instructions from their healthcare provider and local or state health department

The symptomatic person may or may not be able to receive a diagnostic test from their healthcare provider or health department. Decisions about testing are at the discretion of state and local health departments and/or individual healthcare providers.

Discontinuing Self-Isolation

According to the CDC*, there are two ways to discontinue self-isolation: a test and based on symptoms. These methods are for people with infection who have symptoms and were directed to care for themselves at home. The test-based approach is contingent on the availability of ample testing supplies and laboratory capacity as well as convenient access to testing.

Conditions indicating recovery with the test-based approach:

- No longer have a fever (without the use of medicines that reduce fever) AND
- Other symptoms have improved AND
- Two negative test results in a row, 24 hours apart

Conditions indicating recovery with the symptom-based approach:

- No fever for at least 3 days (72) hours – without the use of medicine that reduces fever AND
- Other symptoms have improved AND
- At least 10 days have passed since symptoms first appeared

*CDC guidance for infection may be adapted by state and local health departments to respond to rapidly changing local circumstances.

After an employee meets the criteria to discontinue home isolation, they should contact their employer about returning to work.

Assessment Results: “Yes” to Self-Isolate or Self-Quarantine Question

An individual who responds “yes” to being advised to self-isolate or self-quarantine by their healthcare provider or a local public health official should return to their self-isolation or self-quarantine immediately. They should also contact their healthcare provider or local public health official and inform them of breaking self-quarantine or self-isolation, then follow their recommendations on how to proceed.

Assessment Results: “Yes” to Travel Question

An individual who responds “yes” to having traveled to/from another state or country recently should be instructed to follow current guidance from state and local public health officials as to whether self-isolation or self-quarantine is warranted based on the state or country recently traveled to/from.

What happens if an individual becomes symptomatic during the workday?

Any employee, visitor, vendor, or subcontractor who becomes sick during the day should immediately be separated from other individuals at the worksite, sent home, and advised to contact their healthcare provider. Prior to the symptomatic individual leaving the premises, the PCO will determine which persons may have been exposed to the virus and need to take additional precautions; this process is known as contact tracing (see section below for more details on contact tracing). KCA workplaces will follow public health recommendations for community-related exposure. This guidance indicates that employees who had close contact (within six feet) for a prolonged period (15 minutes) with the symptomatic person during the period 48 hours before symptom onset until the symptomatic person meets the criteria to discontinue home isolation should self-quarantine, self-monitor for symptoms, and practice physical distancing for 10 days. Under this circumstance, KCA will close off areas used by the person who is sick. KCA will not necessarily need to cease operations if it is possible to close off affected areas. If possible, open outside doors and windows and use ventilating fans to increase air circulation in the area. If possible, supervisors should wait 24 hours before cleaning and disinfecting to minimize potential for other employees being exposed to respiratory droplets. If waiting 24 hours is not feasible, wait as long as possible. All items and surfaces that the employee had contact with should be cleaned and disinfected.

Contact Tracing

Contact tracing is a process used to identify, educate, and monitor people who have had close contact with an infected person. These people are at increased risk for infection and spreading the virus to others. Contact tracing helps exposed individuals understand their risk and limit further spread of the virus.

While typically performed by public health agencies, KCA is committed to doing its part to facilitate contact tracing and thereby the prevention of the spread of infection and to ensuring the safety and health of its employees (including those individuals encountering KCA employees at various worksites).

Should an employee (or other individual) test positive for infection, KCA will maintain a record of any affected employees/areas to include:

- Attendance records, including employees' scheduled shifts
- For indoor office environments, records of a floor plan or seating chart
- For construction jobsites, records of all workers, vendors, subcontractors, and visitors who entered the site including tracking records of employees assigned to specific work areas, groups of workers who worked together on a specific task or are otherwise worked in close contact (within six feet) for a prolonged period (15 minutes)

TOPICS	INITIALS	TOPICS	INITIALS
General Requirements		Confined Spaces	
Definitions		Overhead Work	
Assignment of Responsibilities		Electrical Work	
Penalties & Remedial Actions		Excavations & Trenches	
Training		Unattended Work Areas & Housekeeping	
Hazard Identification, Risk Assessment, and Control		Signs, Signals, & Barricades	
Subcontractor Safety Management		Elevated Working Platforms & Aerial Lifts	
Identification & Verification		Scaffolding	
Prohibited Materials		Ladders	
Telephones & Personal Electronic Devices		Compressed Gas Cylinders	
Prohibited & Protected Use of KCA Customer Facilities		Powered Industrial Trucks & Forklifts	
Shutdowns & Disruptions of KCA Customer Services		Hand & Power Tool Safety	
Automobiles & Parking		Powder-Actuated Tools	
Equipment Operation (Certifications & Training)		KCA Hazard Communication Program	
Personal Protective Equipment (PPE)		First Break Line	
Noise & Hearing Conservation		Blood-borne Pathogens	
Heat & Cold Stress		First Aid	
KCA Hazardous Energies & Lockout/Tagout Program		KCA Emergency Action Plan	
Fire Protection		KCA Accident Investigation & Reporting Program	
Welding, Cutting, Grinding, & Hot Work Permits		Rigging Material Handling	
		Pandemic Plan	

By initialing above and signing below, I hereby state that I have read, understood, and will comply with all the standards listed and set forth in this document, version: April 3, 2023, Revision 13, while on Kuhlke projects and/or customer property.

NAME _____

DATE _____

SIGNATURE _____