Parking Concepts, Inc

Injury and Illness Prevention Program

This Injury and Illness Prevention Program is current as of: 1/10/2026

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Parking Concepts, Inc
Policy Statements

This policy will be in effect until February 3, 2025, and recordkeeping will apply until February 3, 2026.

All employees must adhere to the following COVID-19 Prevention Program requirements, except under the following circumstances:

a. Work locations with one employee who does not have contact with other people.
b. Employees working from home.
c. Employees with occupational exposure as defined by section 5199 - Aerosol Transmissible Diseases.

Note: Maintenance, renovation, service, or repair operations involving air handling systems or equipment or building areas that may reasonably be anticipated to be contaminated with aerosol transmissible pathogens (ATPs) or ATPs-L, including:

a. Areas in which Airborne Infectious Disease (AirID) cases and suspected cases are treated or housed.
b. Air handling systems that serve airborne infection isolation rooms or areas (AIIRs).
c. Equipment such as laboratory hoods, biosafety cabinets, and ventilation systems that are used to contain infectious aerosols.
d. Employees teleworking from a location of the employee's choice, which is not under the control of Parking Concepts, Inc.

Employees may have to follow more protective or stringent state or local health department mandates or guidance than described below in our COVID-19 Prevention Program.

Definitions

The following definitions apply to this COVID-19 Prevention Program.

Close contact means the following, unless otherwise defined by regulation or order of the California Department of Public Health, in which case the CDPH definition shall apply:

a. In indoor spaces of 400,00 or fewer cubic feet per floor, a close contact is defined as sharing the same indoor airspace as a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during COVID-19 case's infectious period, as defined by this section, regardless of the use of face coverings.
b. In indoor spaces greater than 400,000 cubic feet per floor, a close contact is defined as being within 6 feet of the COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period, as defined by this section, regardless of the use of face coverings.
c. Offices, suites, rooms, waiting areas, break or eating areas, bathrooms, or other spaces that are separated by floor-to-ceiling walls shall be considered distinct indoor spaces.

Exception: Employees have not had close contact if they wore a respirator required by the employer and used in compliance with section 5144 whenever they would otherwise have had a close contact under subsections 3205(b)(1)(A) or (b)(1)(B).

COVID-19 (Coronavirus Disease 2019) means the disease caused by SARS-CoV-2 (Severe Acute Respiratory Syndrome Coronavirus 2).

COVID-19 Case means a person who:

a. Has a positive “COVID-19 test”; or
b. Has a positive COVID-19 diagnosis from a licensed health care provider; or
c. Is subject to a COVID-19-related order to isolate issued by a local or state health official; or
d. Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county.

COVID-19 Hazard means potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing or from procedures performed on persons which may aerosolize saliva or respiratory tract fluids. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

COVID-19 Symptoms means a fever of 100.4 degrees Fahrenheit or higher, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

COVID-19 Test means a test for SARS-CoV-2 that is:

a. Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the United States Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test).
b. Administered in accordance with the authorized instructions; and
c. To meet the return-to-work criteria set forth in subsection 3205(c)(5), a COVID-19 test may be both self-administered and self-read on if another means of independent verification of the results can be provided (e.g., a time-stamped photograph of the results).

Exposed Group means all employees at a work location, working area, or a common area at work, where a COVID-19 case was present at any time during the high-risk exposure period. Common areas at work include bathrooms, walkways, hallways, aisles, break or eating areas and waiting areas. The following exceptions apply:

a. For the purpose of determining the exposed group, a place where persons momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work.
b. If the COVID-19 case was part of a distinct group of employees who are not present at the workplace at the same time as other employees, for instance a work crew or shift that does not overlap with another work crew or shift, only employees within that distinct group are part of the exposed group.
c. If the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the high-risk exposure period, and the COVID-19 case was wearing a face covering during the entire visit, then other people at the work location, working area, or common area are not part of the exposed group.

Note: An exposed group may include the employees of more than one employer.

Face Covering means a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers (i.e., fabrics that do not let light pass through when held up to a light source) that completely covers the nose and mouth and is secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they will have two layers of fabric, or be folded to make two layers. A face covering is a solid piece of material without slits, visible holes, or punctures, and must fit snugly over the nose, mouth and chin with no large gaps on the outside of the face. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

This definition includes clear face coverings or cloth face coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet this definition and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker's mouth or facial expressions to understand speech or sign language respectively.

Infectious Period means the following time period, unless otherwise defined by CDPH regulation or order, in which case the CDPH definition shall apply:

a. For COVID-19 cases who develop COVID-19 symptoms, from two days before the date of symptom onset until:
    1. Ten days have passed after symptoms first appeared, or through day five if testing negative on day five or later; and
    2. Twenty-four hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved.
b. For COVID-19 cases who never develop COVID-19 symptoms, from two days before the positive specimen collection date through 10 days (or through day five if testing negative on day five or later) after the date on which the specimen for their first positive test for COVID-19 was collected.

Respirator means a respiratory protection device approved by the National Institute for Occupational Safety and Health (NIOSH) to protect the wearer from particulate matter, such as an N95 filtering facepiece respirator.

Returned case means a COVID-19 case who was excluded from work but returned pursuant to subsection 3205(c)(5)(A) and did not develop any COVID-19 symptoms after returning. A person shall only be considered a returned case for 30 days after the initial onset of COVID-19 symptoms or, if the person never developed COVID-19 symptoms, for 30 days after the first positive test. If a period other than 30 days is required by a CDPH regulation or order, that period shall apply.

Worksite, for the limited purposes of COVID-19 prevention regulations only, means the building, store, facility, agricultural field, or other location where a COVID-19 case was present during the infectious period. It does not apply to an employer’s buildings, floors, or other locations where a COVID-19 case did not enter.

Written COVID-19 Prevention Program

Parking Concepts, Inc has established, implemented, and maintains an effective COVID-19 Prevention Program. Our program may be integrated into our Injury and Illness Prevention Program or be maintained in a separate document.

We will allow employees and their representative(s) to participate in the evaluation, identification, and prevention of COVID-19 hazards.

Application of Section 3203

When determining ways to prevent the transmission of COVID-19 and how to identify and correct COVID-19 hazards, Parking Concepts, Inc will consider all persons to be potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results.

When deciding ways to prevent Covid-19 transmission and to identify and correct COVID-19 hazards, Parking Concepts, Inc will review applicable orders and guidance related to COVID-19 from the State of California and the local health department with jurisdiction over the workplace and will treat COVID-19 as an airborne infectious disease. Prevention controls include remote work, physical distancing, reducing the density of people indoors, moving indoor tasks outdoors, implementing separate shifts and/or break times, restricting access to the work area, and any additional measures necessary to prevent transmission of COVID-19.

All Parking Concepts, Inc employees will receive COVID-19 training in accordance with subsection 3203(a)(7).

Procedures for investigating COVID-19 illnesses in the workplace, as required by 3203(a)(5), will include the following:

a. Parking Concepts, Inc will determine the day and time a COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
b. Parking Concepts, Inc will effectively identify and respond to persons with COVID-19 symptoms at the workplace. Employees will be encouraged to report COVID-19 symptoms and to stay at home when ill.

Parking Concepts, Inc will respond to COVID-19 cases at the workplace with the following methods and/or procedures:

a. Parking Concepts, Inc will immediately exclude from the workplace all COVID-19 cases and employees excluded under section 3205.1. The following requirements will be applicable:
    1. COVID-19 cases who do not develop COVID-19 symptoms will not return to work during the infectious period.
    2. COVID-19 cases that develop COVID-19 symptoms will not return to work during the shorter of the following: infectious period; or through 10 days after the first symptoms and at least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has been resolved without the use of fever-reducing medication.
    3. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case shall wear a face covering in the workplace until 10 days have passed since the date COVID-19 symptoms first began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.
    4. The requirements of 3205(c)(5)(A)1. And (c)(5)(A)2. apply regardless of whether an employee has previously been excluded or other precautions were taken in response to an employee’s close contact or membership in an exposed group.

b. Parking Concepts, Inc will review current CDPH guidance for employees who had close contacts, including any guidance regarding quarantine or other measures to be taken to reduce transmission. We will continue to develop, implement, and maintain effective policies to prevent the transmission of COVID-19 by those persons who had close contact.
c. If an employee is ordered to isolate, quarantine, or exclude from work by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order if lifted.
d. If no violations of local or state health official orders for isolation, quarantine, or exclusion would result, the Division, upon request, may allow employees to return to work on the basis that the removal of an employee would create undue risk to the community's health and safety. In such cases, Parking Concepts, Inc will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employee at the workplace and, if isolation is not feasible, the use of respirators in the workplace.
e. If an employee is excluded from the workplace based on COVID-19 or a close contact, we will provide the employee with information regarding COVID-19 related benefits that the employee may be entitled to under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick leave, if applicable, workers' compensation law, government requirements, our own leave policy, and leave guaranteed per contract.

Testing of Close Contacts

We will make COVID-19 tests available at no cost, during paid time, to all of our employees who may have had a close contact in the workplace, with the exception of returned cases as defined in subsection 3205(b)(11) and provide them with the information on benefits described in 3025(c)(5)(E).

Notice of COVID-19 Cases

Parking Concepts, Inc will inform all employees and independent contractors who had a close contact, as well as any employer whose employee had a close contact. Notice will be given as soon as possible, and in no case longer than the time required to ensure that the exclusion requirements of subsection 3205(c)(5)(A) are met.

When Labor Code section 6409.6 or any successor law is in effect, we will provide notice of a COVID-19 case, in a form readily understandable to employees. Notice will be given to all employees, employers, and independent contractors at the worksite in accordance with the applicable law.

When Labor Code section 6409.6 or any successor law is in effect, we will provide notice in accordance with the applicable law to the authorized representative, if any, of the COVID-19 case and of any employees who had a close contact. We will also provide in accordance with applicable law to the authorized representative, if any, of all employees on the premises at the same worksite as the COVID-19 case during the infectious period.

Face Coverings

Parking Concepts, Inc will provide face coverings and ensure they are worn by all employees when required by a CDPH regulation or order. When a CDPH regulation or order requires face coverings indoors, that also includes spaces within vehicles. Face coverings will be clean, undamaged, and worn over the mouth and nose.

When employees are required to wear face coverings under this section or section 3205.1 through 3205.3, the following exception apply:

a. When an employee is alone in a room or vehicle.
b. When eating or drinking at the workplace, as long as employees are at least six feet apart and, if indoors, the supply of outside or filtered air is being maximized to the extent feasible.
c. When employees are required to wear respirators and are used in compliance with section 5144.
d. Employees who are unable to wear face coverings due to a medical or mental condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. These employees will wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if condition or disability allows it.
e. During tasks that cannot feasibly be performed while wearing a face covering. This exception is limited to the time period while the task(s) is/are actually being performed.

Respirators

Parking Concepts, Inc will provide employees who are working indoors or in a vehicle with one or more persons with respirators for voluntary use upon request. The voluntary use will be in compliance with subsection 5144(c)(2). When respirators are provided for voluntary use, we will encourage them to be used and ensure that employees are provided with a respirator of the appropriate size. Employees will be trained how to properly wear their respirator, perform a seal check per the manufacturer's instructions before each use, and how facial hair interferes with the seal of the respirator.

Ventilation

For all indoor workspaces, Parking Concepts, Inc will use the CDPH and the Division guidance for proper ventilation. "Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments" will be one resource used to determine the best ventilation practices.

We will use at least one of the following methods to ensure proper ventilation:

a. Maximize the amount of outside air by opening doors and windows. This method cannot be used if the EPA AQI is greater than 100 for any pollutant or if opening doors and windows or maximizing outdoor fresh air another way will cause a different hazard to employees, such as excessive heat or cold.
b. When working in buildings and structures with mechanical ventilation, air will be circulated through a filter with a Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.

c. We will use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods when ventilation is inadequate to reduce the risk of COVID-19 transmission.

When required to follow section 5142 or 5143, we will comply with those sections, as applicable.

Note: Section 5142 requires heating, ventilating, and air-conditioning (HVAC) systems to be operated continuously during working hours, with limited exceptions.

In vehicles, we will maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

Workplaces subject to section 3205.1 after February 3, 2023, will continue to comply with the ventilation requirements of subsection 3205.1(f) even after the outbreak has passed and section 3205.1 is no longer applicable.

Aerosolizing Procedures

When employees are in a work setting that is exempt from section 5199 in accordance with the conditions in subsection 5199(a)(2)(B), who are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluid, we will evaluate the need for respiratory protection to prevent COVID-19 transmission under section 5144 and will comply with that section.

Reporting and Recordkeeping

We will keep record of and track all COVID-19 cases with the employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of the positive COVID-19 test and/or COVID-19 diagnosis. The records will be retained for two years beyond the time period in which the record is necessary to meet requirements of this section or sections 3205.1 through 3205.3.

We will retain all notices required by subsection 3205(e) in accordance with Labor Code section 6409.6 or any successor law.

Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee medical records required by this section or by sections 3205.1 through 3205.3, will be kept confidential unless disclosure is required or permitted by law. Unredacted information about COVID-19 cases will be provided to the local health department with jurisdiction over the workplace, CDPH, the Division, and NIOSH immediately upon request and when required by law.

Orders

Pursuant to title 8, section 332.3, the Division may require us to take additional actions to protect employees against COVID-19 hazards through the issuance of an Order to Take Special Action.

3205.1 COVID-19 Outbreaks

Scope

The following applies until February 3, 2025

a. The following section applies to all workplaces covered by section 3205 if three or more employee COVID-19 cases within an exposed group, as defined by subsection 3205(b)(7), visited the worksite during the infectious period at any time during a 14 day period, unless a California Department of Public Health (CDPH) regulation or order defines an outbreak using a different number of COVID-19 cases and/or a different time period, in which case this section applies when the number of cases at the worksite constitutes an outbreak under CDPH's definition.
b. This section will continue to be implemented until there are one or no new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 Testing

Immediately upon implementing this section, we will make COVID-19 testing available at no cost to its employees within the exposed group, regardless of vaccination status, during employees' paid time, except for returned cases and employees who were not present at the workplace during the relevant 14-day period(s) under subsection 3205.1(a).

We will then make testing available on a weekly basis to all employees in the exposed group who remain at the workplace.

Employees who had close contacts will have a negative COVID-19 test taken within three to five days after the close contact or will be excluded and follow the return-to-work requirements of subsection 3205(c)(5) starting from the date of the last known close contact.

Face Coverings

Employees who are part of the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and unable to maintain a six-foot separation from other workers, unless one of the exceptions in subsection 3205(f)(2) applies.

Respirators

We will notify employees of their right to request and receive a respirator for voluntary use under subsection 3205(g).

COVID-19 Investigation, Review, and Hazard Correction

Parking Concepts, Inc will conduct a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19 when this section initially applies and periodically thereafter. The review will be documented and include the following:

a. Investigation of new or unabated COVID-19 hazards including our company leave policies and practices and whether employees are discouraged from remaining home while sick; our COVID-19 testing policies; insufficient supply of outside air to indoor workplaces; insufficient air filtration; and insufficient physical distancing.

b. The review will be updated every 30 days while this section is being implemented, in response to new information or to new or previously unrecognized COVID-19 hazards, or when otherwise necessary.
c. All changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include moving indoor tasks to outdoors spaces or having them performed remotely; increasing the supply of outside air while working indoors; improving air filtration; increasing physical distancing to the extent feasible; requiring respiratory protection in compliance with section 5144; and any other applicable controls.

Ventilation

In buildings and structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV)-13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will use High Efficiency Particulate Air (HEPA) air filtration units in accordance with the manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

Major Outbreaks

When there are 20 or more employee COVID-19 cases in an exposed group, as defined by subsection 3205(b)(7), visited the worksite during the infectious period within a 30-day period, we will do the following while section 3205.1 applies:

a. The COVID-19 testing described in subsection 3205.1(b) will be required for all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by the local health department with jurisdiction over the workplace. Employees in the exposed group will be tested or will be excluded and follow the return-to-work requirements of subsection 3205(c)(5).
b. We will report the outbreak to the Division. This subsection will not limit our obligation to report employee deaths, serious injuries, or serious illnesses when required by subsection 342(a).
c. We will provide respirators for voluntary use in compliance with subsection 5144(c)(2) to employees in the exposed group, will encourage their use, and will train employees provided respirators for voluntary use, as set forth in subsection 3205(g)
d. All employees in the exposed group who are not wearing respirators that we require to be used in compliance with section 5144 will be separated from other persons by at least six feet, except where we can demonstrate that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include: telework or other remote work arrangements; reducing the number of persons in an area at one time, including visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees. When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as possible.

3205.2 COVID-19 Prevention in Employer-Provided Housing

Scope

This section applies to employer-provided housing until February 3, 2025. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. Our employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by our company, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the workers’ employment, whether or not rent or fees are paid or collected.

The following exceptions apply:

a. This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response as utilities, communications, and medical operations, if:
    1. The company is a government entity; or
    2. The housing is provided temporarily by a private employer and is necessary to conduct emergency response operations.
b. This section does not apply to housing in which all residents maintain a household together prior to residing in employer-provided housing, such as family members.
c. This section does not apply to employees with occupational exposure as defined by section 5199, when covered by that section.
d. This section does not apply to employer-provided housing used exclusively to house COVID-19 cases or where a housing unit houses one employee.

Assignment of Housing Units

To the extent feasible, we will assign housing to cohorts that travel and work together, separate from other workers. To the extent feasible, residents who usually live together will be housed in a single housing unit without other people.

Ventilation

In housing units, we will maximize the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system. If there is not a Minimum Efficiency Reporting Value (MERV)-13 or higher in use, portable or mounted High Efficiency Particulate Air (HEPA) filtration units will be used, to the extent feasible, in all sleeping areas.

Face Coverings

We will provide face coverings to all residents and provide information to residents on when they should be used in accordance with state or local health department orders or guidance.

Reporting Systems

We will encourage residents to report any COVID-19 symptoms to their supervisor.

COVID-19 Testing

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of residents who had close contact or COVID-19 symptoms. These policies and procedures will be communicated to the residents.

COVID-19 Cases and Close Contacts

We will effectively isolate COVID-19 cases from all residents who are not COVID-19 cases, for the period established by subsection 3205(c)(5)(A). Effective isolation will include housing COVID-19 cases only with other COVID-19 cases and providing COVID-19 case residents with a sleeping area and bathroom that is not shared by non-COVID-19 case residents.

We will effectively quarantine residents who have had a close contact from all other residents, in accordance with subsection 3205(c)(5)(B). Effective quarantine will include providing residents who had a close contact with a private bathroom and sleeping area.

3205.3 COVID-19 Prevention in Employer-Provided Transportation

Scope

This section applies until February 3, 2025, to employer-provided motor vehicle transportation to and from work, during the course and scope of employment, which is provided, arranged for, or secured by our company regardless of the travel distance or duration involved, with the following exceptions:

a. Employees alone in a vehicle, employees taking public transportation, or vehicles in which the driver and passenger are from the same household outside of work, not subject to section 3205.2.
b. Employer-provided transportation necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations.
c. Employees with occupational exposure as defined by section 5199, when covered by that section.

We will comply with the requirements of 3205 within a vehicle and shall respond to a COVID-19 case within the vehicle in accordance with the requirements of that section.

Assignment of Transportation

To the extent feasible, we will assign transportation such that cohorts travel and work together, separate from other workers. To the extent feasible, employees who usually live together will travel together.

California Title 8 Chapter 4, Subchapter 4, Construction Safety Orders, establishes minimum occupational safety & health standards that apply to all places of employment in California. Additional specific Safety Orders which, if applicable to our operations, take precedence over the Construction Safety Orders and are found in other subchapters (click here).

We will provide our supervisory staff with a copy of these orders and assure that each supervisor is familiar with those sections pertaining to the operations under their supervision. Compliance with these orders may not in itself prevent occupational injuries or diseases, but it will provide a safe environment which is a fundamental prerequisite in controlling injuries.

It is our policy to provide a work environment that is inherently safe, and our goal is an accident free workplace with zero accidents and occupational diseases. The safety and health of our employees is of primary importance as they are our most important resource.

For that reason, we have established and will implement and maintain a written Injury and Illness Prevention Program (IIPP) in accordance with Title 8 of the California Code of Regulations, Section 3203 (T8 CCR 3203). A copy will be maintained at each workplace and/or at a central bulletin board accessible to all employees.

Our comprehensive IIPP is designed to make full provision for securing safety in places of employment. It addresses our specific safety concerns and provides guidance for the performance of our individual job tasks within the framework of appropriate Cal/OSHA standards.

This IIPP contains the eight essential elements identified in Title 8 of the California Code of Regulations, Section 3203 (T8 CCR 3202).

These elements are:

a. Responsibility
b. Compliance
c. Communication
d. Hazard Assessment
e. Accident/Exposure Investigation
f. Hazard Correction
g. Training and Instruction
h. Recordkeeping

Safety training will be interactive with an opportunity for all to actively participate, ask questions, make suggestions, and refer to our written policies and procedures. Training needs will be identified by continual reassessment of our work methods, equipment, and facilities as well as employee and management input.

Safety takes a commitment from all personnel within our organization. It requires not only that employees understand & perform individual tasks in a safe manner, but also that they are aware of their surroundings & are actively involved in the safety of others.

Observation of unsafe acts will be addressed immediately. Employees are encouraged to contact their supervisor should a safety or health risk exist so that corrective action may be taken immediately.

This Policy Statement will be conspicuously posted.

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David L Mueller

President

Parking Concepts, Inc

New Hire Safety Orientation Policy Statement

Zoe Robinette, the safety director at Parking Concepts, Inc , or a designated competent person, will ensure that all new hires are aware of the accessibility of the safety program and, through interactive discussion or practical demonstration, be assured that the new hire understands the safety policies and procedures that pertain to the actual work the new hire will perform.

Further, each new hire will read (or have explained) the contents of our employee handbook and **sign** the Employee Acknowledgement form which states:

> I have read and understand the contents of the Parking Concepts, Inc Employee Handbook.
>
> I will, to the best of my ability, work in a safe manner and follow established work rules and procedures.
>
> I will ask for clarification of safety procedures of which I am not sure **prior** to performing a task.
>
> I will report to the workplace supervisor or competent person any unsafe acts or procedures and will ensure they are addressed and resolved before continuing work.
>
> I understand that the complete safety program is located in the corporate website and is available for my review:

It will be explained to all new hires that safety training and safety performance is an on-going process. Depending on circumstances, training will take the form of some or all of the following: safety meetings, on-the-job instruction, formal and informal training.

Lastly, all new hires will be informed of the importance of the inspection and enforcement policies and procedures of Parking Concepts, Inc .

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David L. Mueller

President

Parking Concepts, Inc

Stop Work Authority and Workers' Right to Refuse Dangerous Work Policy Statement

As referenced in the New Hire Safety Orientation, each employee is:

a. To work in a safe manner and follow established work rules and procedures to the best of their ability.
b. To ask for clarification of safety procedures of which they are not sure prior to performing a task.
c. To report to the job site supervisor or competent person any unsafe acts or procedures and will ensure they are addressed and resolved before continuing work.

Specific procedures have been established to ensure that all employees understand the importance of **not** performing a job task if it cannot be performed safely and in accordance with appropriate standards.

Stop Work Authority Procedures training will be given during the new hire safety orientation before initial assignment to any job task. Training will be documented and include the employee's name, dates of training, and subject.

All employees not only have the authority to stop work when control of a health, safety, or environment hazard or risk is not clearly established or understood, they have an obligation to stop work.

Procedures:

a. Upon discovery or realization that control of a health, safety, or environment hazard or risk is not clearly established or understood, the employee will immediately stop work.
b. Employees with whom he/she is working will be immediately informed so a health, safety, or environment hazard or risk does not impact them or their work.
c. The supervisor/competent person will be notified as soon as possible so the situation may be addressed (corrected).
d. If the supervisor/competent person can successfully address the issue, work will resume. If it is not resolved, work will remain stopped until it is. Most stop work procedures can be resolved in a timely manner at the job site. On occasion, it may require additional investigation to determine the root cause of the problem and the proper procedures to proceed.
e. The stop work will be documented with a stop work report.

Supervisor Review:

Supervisors reviewing stop work reports can determine employee participation in the program, the quality of the interventions, trend common issues, and identify opportunities for improvement and establish new safety procedures to preclude a reoccurrence.

Follow-up:

After the stop work intervention has been initiated and closed, the supervisory review has been completed, all safety issues have been resolved in a timely manner at the job site to the satisfaction of all persons concerned prior to the resumption of work (or, if needed, after additional investigation and corrective actions required to identify and address root causes have been completed), the **importance of follow-up** can be demonstrated by:

a. providing a learning tool for developing improved training.
b. establishing new safety procedures.
c. facilitating sharing of learning.

Responsibilities:

Employee: Initiate a stop work intervention when warranted.

Supervisor/competent person: notify all affected personnel and supervision of the stop work issue, correct the issue, and resume work when safe to do so.

Management: Establish a culture where stop work authority is exercised freely.

Employees, while fulfilling their **obligation** to stop work when warranted, are reminded that under no circumstances will fulfilling this obligation result in any form of retribution or intimidation from our company or the company for whom we are working

This Policy Statement will be conspicuously posted.

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David L. Mueller

President

Parking Concepts, Inc Section I
General Policies & Procedures

Standards:

Division of Occupational Safety and Health - Title 8 regulations
California Recordkeeping Standard, Section 14300

Code of Safe Practices

Below are core safety rules that apply in all situations:

a. Never do anything that is unsafe for any reason. If an unsafe condition is found, report it to your supervisor.
b. Do not remove or disable any safety device. Keep all guards in place at all times on operating machinery, equipment, and power tools.
c. Do not perform any work task unless trained prior to initial assignment.
d. Never operate a piece of equipment unless trained and authorized.
e. Use your personal protective equipment whenever it is required.
f. Obey all safety warning signs.
g. Working under the influence of alcohol or illegal drugs or using them at work is prohibited.
h. Do not bring firearms or explosives on to company property or on to any job site.
i. Horseplay, running, and fighting is prohibited.
j. Clean up spills immediately.
k. Replace all tools and supplies after use.
l. Do not allow debris to accumulate. Practice good housekeeping.
m. Walk-around safety inspections will be conducted at the beginning of each job and at least weekly thereafter.
n. Foremen will insist on employees observing and obeying every rule, regulation, and order as is necessary to the safe conduct of the work and will take such action as is necessary to obtain observance.
o. All employees will be given frequent accident prevention instructions. Instructions will be given at least every 10 working days. When applicable, the accident prevention instructions will also include specific instruction on the safe use, care and maintenance of fall protection equipment (i.e. fall arrest systems, positioning device systems, safety nets, etc.) used at the jobsite.
p. Work will be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
q. Employees will not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that it is safe to enter.
r. All injuries will be reported promptly to the foreman or superintendent so that arrangements can be made for medical or first aid treatment.
s. When lifting heavy objects, the large muscles of the leg instead of the smaller muscles of the back will be used.
t. Inappropriate footwear or shoes with thin or badly worn soles will not be worn.
u. Employees will cleanse thoroughly after handling hazardous substances and follow special instructions from authorized sources.

v. No burning, welding, or other source of ignition will be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from the foreman or superintendent.

w. Any damage to scaffolds, falsework, or other supporting structures will be immediately reported to the foreman and repaired before use.

Below are core safety rules that apply to the use of tools and equipment:

a. All tools and equipment will be maintained in good condition.

b. Damaged tools or equipment will be removed from service and tagged "DEFECTIVE."

c. Only appropriate tools will be used for the job.

d. Wrenches will not be altered by the addition of handle-extensions or "cheaters.'·

e. Files will be equipped with handles and not used to punch or pry.

f. A screwdriver will not be used as a chisel.

g. Portable electric tools will not be lifted or lowered by means of the power cord. Ropes will be used.

h. Electric cords will not be exposed to damage from vehicles.

i. In locations where the use of a portable power tool is difficult, the tool will be supported by means of a rope or similar support of adequate strength.

Below are core safety rules that apply to the use of machinery and vehicles:

a. Only authorized persons will operate machinery or equipment.

b. Loose or frayed clothing, or long hair, dangling ties, finger rings, etc., will not be worn around moving machinery or other sources of entanglement.

c. Machinery will not be serviced, repaired or adjusted while in operation, nor will oiling of moving parts be attempted, except on equipment that is designed or fitted with safeguards to protect the person performing the work.

Copies of our Code of Safe Practices will be posted on job sites.

Injury and Illness Prevention Program Overview

This comprehensive Injury and Illness Prevention Program (IIPP) has been developed to address our specific safety concerns and to provide guidance for the performance of individual job tasks within the framework of California Title 8 Chapter 4, Subchapter 7, General Industry Safety Orders (GISO). These orders establish minimum occupational safety & health standards that apply to all places of employment in California. Fourteen (14) additional specific Safety Orders which, if applicable to our facility/operations, take precedence over the GISO that are found in other subchapters (click here). We will provide our supervisory staff with a copy of these orders and assure that each supervisor is familiar with those sections pertaining to the operations under their supervision.

Safety demands a commitment from all personnel within Parking Concepts, Inc . We have an obligation to ensure that all our employees are afforded the protection of an appropriate IIPP.

Hazard assessment, pre-planning, and engineering controls, where feasible, will be the preferred method of providing a safe workplace. Hazards that remain will be minimized or eliminated through training which provides our employees the ability to recognize workplace hazards and understand the proper procedural and/or personal protective equipment requirements.

Each employee is encouraged to contact their supervisor immediately should a safety or health risk exist so that corrective action may be taken to eliminate the hazard entirely or deal with the hazard in a safe manner through modified work procedures, PPE, and/or other appropriate action.

Zoe Robinette, our Safety Director, or a designated competent person will make routine and random inspections to both identify new hazards and to monitor the effectiveness of our IIPP.

In the final analysis, the success of our safety effort depends on all employees from senior management to the newest hire demonstrating a commitment to safety by working in a safe manner. Safe job performance is how our safety effort is ultimately measured.

Employee Access to our IIPP

All employees will be allowed the right and opportunity to examine and receive a copy of our IIPP. Access will be provided in a reasonable time, place, and manner no later than 5 business days after the request for access is received from an employee or their designated representative.

Note: A designated representative is any individual, or organization, who is given written authorization to exercise the right of access. A recognized or certified collective bargaining agent will be automatically treated as a designated representative for the purpose of access to our IIPP.

The written authorization to request a copy must contain the following information:

a. **The name and signature of the employee authorizing a designated representative to access our IIPP on the employee's behalf;**
b. **The date of the request;**
c. **The name of the designated representative (individual or organization) authorized to receive our IIPP on the employee's behalf; and**
d. **The date upon which the written authorization will expire (if less than one (1) year).**

Access to our IIPP will be provide by one of the following:

a. A printed copy of our IIPP will be provided, unless the employee or designated representative agrees to receive an electronic copy.

   Note: One printed copy will be provided free of charge. If additional copies are requested within 1 year of the previous request, and our program has not been updated with new information since the prior copy was provided, we may charge reasonable, non-discriminatory reproduction costs for the additional copies.

   OR

b. Unobstructed access will be provided through a company server or website, which allows an employee to review, print, and email the current version of our IIPP. Unobstructed access means that the employee, as part of his or her regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.

The IIPP provided to the employee or designated representative does not need to include any of the records associated with the written program. However, employees and collective bargaining agents may collectively bargain to obtain access to additional information.

If we have distinctly different and separate operations with distinctly separate and different IIPPs, access will be limited to the IIPP (or IIPPs) applicable to the employee requesting it.

Accident/Injury Prevention

Our Injury and Illness Prevention Program is designed so that our employees do not work in conditions that are unsanitary, hazardous, or dangerous to their health or safety.

One lax moment in terms of safety may result in a lifetime of needless pain and suffering. Disregarding safety standards may even be fatal. While an accident may happen in an instant, the consequences may last for years.

Accident prevention requires a commitment from all personnel within our company to actively participate in our safety program. All personnel should be aware of workplace-related hazards and follow procedures to eliminate these hazards by using proper work methods, use of personal protective equipment, and proper use of tools and equipment. All persons are encouraged to ask questions and make positive suggestions for safety improvement.

Competent persons will be designated to provide workplace expertise, as well as regular inspections of equipment, materials, and procedures.

Competent persons will have the authority to stop work if a safety hazard is identified and it cannot be corrected immediately.

All machinery, tools, materials, and equipment deemed unsafe will be taken out of service by physically removing, tagging, or locking controls to render them inoperable.

Only persons qualified by training or experience will be allowed to operate equipment or machinery.

All tools and items of equipment will be used for the purpose for which they were designed. For example, a wrench is not a hammer, a ladder is not a horizontal plank, and a fire extinguisher is not a cooler!

Never take chances or attempt any procedure without being aware of the proper methods, the potential safety hazards, and the methods to reduce or eliminate risk.

Company Personnel

All levels of management are responsible for ensuring that all appropriate safety and health policies and procedures are clearly communicated to and understood by all employees. This includes California Title 8 Chapter 4, Subchapter 4, Construction Safety Orders which establishes minimum occupational safety & health standards that apply to all places of employment in California and any additional specific Safety Orders found in other subchapters which take precedence over the Construction Safety Orders applicable to our operations. We will provide our supervisory staff with a copy of these orders and assure that each supervisor is familiar with those sections pertaining to the operations under their supervision. Compliance with these orders may not in itself prevent occupational injuries or diseases, but it will provide a safe environment which is a fundamental prerequisite in controlling injuries and illnesses.

Our Injury and Illness Prevention Program (IIPP) is designed to protect our employees' safety in all places of employment. Managers and supervisors are expected to enforce the rules established in our IIPP fairly and uniformly.

All employees, including supervisors, are responsible for using safe and healthful work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe work environment.

To ensure that all workers comply with the rules and maintain a safe work environment we will:

a. Inform workers of the provisions of our IIPP.
b. Evaluate the safety performance of all workers.
c. Recognize employees who perform safe and healthful work practices.
d. Provide training to workers whose safety performance is deficient.
e. Discipline workers for failure to comply with safe and healthful work practices.
f. Give competent/designated persons "stop-work" authority.

The responsibilities of all employees include the following practices:

a. Reporting unsafe conditions, work practices or accidents to their supervisors or the site safety coordinator(s) immediately.
b. Following safe work practices.
c. Using appropriate personal protective equipment (PPE) as instructed by their supervisors.

Safety Director

Our Safety Director will ensure that each employee has appropriate safety training for the tasks to be performed.

Additionally, duties of the safety director position include:

a. Ensuring trainers are qualified by training or experience to teach specific safety subjects.
b. Maintaining training records.
c. Conducting regular workplace inspections for hazard identification.
d. Conducting random inspections to verify adherence to safety rules and policies.
e. Taking action to mitigate identified hazards.
f. Investigating all accidents, injuries, illnesses, and exposures.
g. Establishing procedures for employee reporting of workplace hazards, accidents, injuries, illnesses, and general safety concerns.
h. Verifying completion of specific tasks identified within our Cal/OSHA compliance programs found in Section III of this safety program.

Our Safety Director is Zoe Robinette.

IIPP Administrator

Our IIPP Administrator has overall authority and responsibility for the implementation of this IIPP. Our IIPP Administrator is qualified by training and experience to competently perform the tasks required by this position.

Duties of the IIPP Administrator position include:

a. Preparing and updating our IIPP.
b. Implementing the provisions in our IIPP.
c. Making sure accidents, injuries, illnesses, and exposures in our workplace are investigated.

Our IIPP Administrator is Zoe Robinette.

Managers and Supervisors

All managers and supervisors are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the IIPP. A copy of this IIPP is available from each manager and supervisor.

Employees

Each individual employee is expected to actively participate in our IIPP.

With the goal of providing a safer worksite for all of us, employee suggestions for improving safety management are welcomed and encouraged.

It is expected that all employees will abide by our safety rules and guidelines [as well as applicable local, state, and federal standards] not only to protect themselves, but also to protect their fellow workers from harm.

Employees are reminded that they are encouraged, without fear of reprisal, to anonymously report safety hazards or concerns. This may be done by telephone to the Safety Director, , or by leaving a sealed envelope containing the concern on the Safety Director’s desk.

Communication

We encourage interactive communication between management and staff on health and safety issues with a goal of ensuring an injury-free, productive workplace.

The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of all of the following below items:

a. New worker orientation including a discussion of safety and health policies and procedures.
b. Review of our IIPP.
c. Workplace safety and health training programs.
d. Regularly scheduled safety meetings.
e. Effective communication of safety and health concerns between workers and supervisors, including translation where appropriate.
f. Posted or distributed safety information.
g. A system for workers to anonymously inform management about workplace hazards.

Employee Evaluation

Our safety program establishes policies and procedures for our employees to enable them to work in a safe manner. Our goal is to provide a workplace that is free from recognized hazards and have a workforce that can perform their individual job tasks safely.

The primary tool used to evaluate employee safety performance is regular and frequent – documented - job site inspections using our job site checklists as a guide.

The second tool is our regularly scheduled – documented - safety meetings which, by design, are interactive allowing the instructor to ask and answer questions and get a solid feel for employee interest and knowledge of the safety topic being discussed.

The third tool is our enforcement program. Not only are all lapses of safety compliance documented on our job site checklists, they are also documented on our enforcement forms.

Subcontractor Involvement & Responsibilities

It is the responsibility of Parking Concepts, Inc to review the safety efforts made by subcontractors who may be working with us.

The four major elements of safety management below apply to the operations of Parking Concepts, Inc and they also apply to our subcontractors:

a. Management commitment and employee involvement.
b. Worksite analysis.
c. Hazard prevention and control.
d. Safety & health training.

It is expected that our subcontractors work within the framework of Cal/OSHA Standards. One measure that will always be taken is the sharing of appropriate Safety Data Sheet information.

Prior to initiation of work on multi-employer job sites, a meeting will be held to explain to all subcontractors the protective measures we have determined to be appropriate. Input and suggestions will be solicited from subcontractors. Attention will be given to the following aspects of coordinating the management of and responsibility for any existing hazards and hazards which may arise during the course of work:

a. Which employer's employees may be exposed to the hazard (the exposing employer);
b. Which employer actually created the hazard (the creating employer);
c. Which employer is responsible, by contract or through actual practice, for safety and health conditions on the worksite; i.e., the employer who has the authority for ensuring that the hazardous condition is corrected (the controlling employer);
d. Which employer has the responsibility for actually correcting or removing the hazard (the correcting employer); and
e. Communication and notification between employers about existing, new, or developing hazards to which the employees of other employers may be exposed.

Regardless of circumstances, Parking Concepts, Inc will always take appropriate feasible steps to protect our employees from hazards, instruct them in hazard recognition, and, where necessary, inform them how to avoid the dangers associated with hazards. If an extreme hazard is involved, appropriate feasible steps will include removing our employees from the job until the hazard can be corrected, if there is no other way to protect them from the hazard.

Hazard Assessment

Our IIPP Administrator, , will inspect and evaluate workplace hazards in all areas when this program is initially established and at least annually thereafter.

At least weekly, inspections to identify and evaluate workplace hazards will be performed by the following competent observer(s) in the following areas of our workplace:

Competent Observer	Area
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

A competent observer will identify and evaluate workplace hazards in the appropriate area when:

a. New substances, processes, procedures, or equipment which present potential new hazards are introduced into our workplace;
b. New, previously unidentified hazards are recognized;
c. Occupational injuries and illnesses occur;
d. We hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
e. In their judgment, workplace conditions warrant an inspection.

The competent observer [or Program Administrator] will use the relevant sections of the Modified California Hazard Assessment Checklist to assist with the Hazard Assessment.

Hazard Correction

Unsafe or unhealthy work conditions, practices, or procedures will be corrected in a timely manner based on the severity of the hazards, including:

a. When a hazard is observed or as soon as it is discovered;
b. When an imminent hazard which cannot be immediately abated without endangering employee(s) and/or property exists, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition will be provided with the necessary protection; and
c. All such actions taken and dates they are completed will be documented on the appropriate forms.

Plans/policies and corrective actions for addressing the specific hazards we have identified in our workplace are found our Hazard Assessment and Correction Record.

Last-Minute Risk Assessment (LMRA)

Last-Minute Risk Assessments will be completed immediately before starting a task. The assessment will be performed by the employee(s) conducting the work and documented. This assessment is to ensure that all controls and precautions are in place prior to work beginning, or after there has been a change to the task or the work area.

The LMRAs will continue to be completed throughout the process of the job to ensure that no new hazards have arisen. This is most important when there is a change to the work being performed.

During the LMRA the following should be considered:

a. What are the hazards?
b. Who may be harmed and how?
c. How will the risk(s) be mitigated or eliminated?

At least weekly, a company supervisor will discuss the current LMRA with the workers. The discussions will be in person, at the job site, and specifically about the immediate task. The supervisor will discuss the LMRA with each crew member involved.

Employees will be provided with training in Last-Minute Risk Assessments (LMRA). The training will include the following:

a. How to identify hazards associated with work activities and tasks.
b. How to mitigate or eliminate the risk associated with the hazard.
c. The obligation to shut down the job if the risk/hazard cannot be mitigated or eliminated.

Job Hazard Analysis

OSHA Booklet 3071 Job Hazard Analysis

All employees will read, or have read to them, the OSHA Booklet 3071 - Job Hazard Analysis and use the information contained therein to complete our Job Task Safety Analysis form.

Using the above referenced booklet and other training materials, employees will be trained in the hazard identification process.

The formal process to identify potential hazards is as follows:

a. A Certificate of Workplace Hazard Assessment will be prepared, signed and dated, by our site PPE Program Administrator, indicating that a hazard assessment of our job sites and methods of operations has been accomplished. This hazard assessment will focus on the need for PPE which cannot be eliminated through engineering or administrative controls.
b. Because they have insight to the hazards involved, employees who actually perform job tasks will be included in job hazard analysis.
c. A review will be made of previous accidents and injuries as well as “near-misses” to determine if existing hazard controls are adequate or need improvement.
d. In discussion with employees, ideas to eliminate hazards will be discussed and formalized for inclusion on our Job Task Safety Analysis form.
e. Hazards associated with various tasks will be ranked and prioritized with the jobs that possess hazards that present unacceptable risks, based on those most likely to occur and with the most severe consequences identified for first priority for analysis.
f. The job task safety analysis form will be completed for each task and, as a matter of course, hazard identification will be performed on all job tasks, both routine and non-routine, before actual work is performed. Hazard identification would be prepared for new processes, changes in operation, products or services, as applicable.

Through frequent and routine job site inspection, review of incidents [or lack thereof], and employee feedback, the above will ensure that the identified hazards are mitigated. Should problems occur or a potential risk/hazard be discovered, work will stop until the job task hazard analysis form is adjusted to correct any deficiencies found.

The above review process will take place on all job tasks to ensure that new hazards were not created while eliminated others.

Training

All employees and supervisors, prior to assignment to perform any work, will demonstrate to safety or other competent person, the ability to perform the tasks safely. Additionally, all employees will be provided employee handbooks and indicate with their signature that they understand our general safety and health work practices.

Additionally, training will be provided:

a. An employee is assigned a new job or task.
b. A new subcontractor is brought on.
c. A new process, procedure, equipment is introduced.
d. A new hazard is present.

To the extent possible, training will be interactive, and will include, as appropriate, formal instruction, scheduled safety meetings, on-line training, on-the job training, and written instructions. Safety information will also be posted on our job site bulletin board. All personnel will have ready access to our safety program as well as employee handbooks.

All training will be documented, and records will be maintained . The records will include the employee's name, date of training, types of training, and the name of the competent training provider.

Note: As a matter of policy, per §1510. Safety Instructions for Employees:

a. When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.

b. We will only permit qualified persons to operate equipment and machinery.

c. Where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.

Safety Meetings

Scheduled at least every 10 days, safety meetings provide an opportunity for reinforcing the importance of general safety as well as specific work-related procedures applicable to the work at hand.

Properly prepared safety meetings will focus on one or two topics and be direct and to the point. All safety questions will be addressed, and interactive participation is encouraged.

All employees are required to attend safety meetings. These meetings will be documented using the Safety Meeting Attendance Documentation.

Housekeeping

Employees are to maintain a neat and orderly work area as far as practical. Housekeeping and general cleanliness have a direct effect on safety and health. Proper housekeeping can prevent slips and falls, allow easy egress in the event of an emergency, prevent falling object injuries, and enhance fire safety. Listed below are general housekeeping rules:

a. All areas of the workplace: passageways, storerooms, service rooms, and walking-working surfaces will be kept in a clean, orderly, and sanitary condition
b. Walking-working surfaces will be maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow and ice, and unnecessary holes and openings.
c. All spilled materials and liquids will be cleaned up immediately.
d. Stored materials will be neatly stacked.
e. Containers, when not in use, will be sealed.
f. No objects will be left unattended on stairways.
g. Entrances and exits will be properly marked and not blocked.
h. Tools and equipment will be properly cleaned and put away after use.
i. Cleaning and sweeping will be done so as to minimize the contamination of the air and avoid harmful exposures.
j. All sweepings, decayable waste, trash, and garbage will be disposed of in a timely manner.
k. Combustible scrap, debris, and waste will be stored safely and removed from the worksite promptly.
l. Enclosed workplaces, storerooms, and service rooms will be maintained free of insects, rodents, or other vermin. An effective program of extermination and control will be instituted whenever their presence is detected.
m. At least the minimum number of toilets and washing facilities will be provided and maintained in a clean and sanitary condition.

Safe Facility Practices

When employees are working in areas such as offices, warehouses, storage areas, garages, etc., compliance with the below safety practices/procedures is mandatory. Supervisors will insist that the safety practices and procedures are observed and are expected to take disciplinary action against employees for non-compliance.

Employees must:

a. Report all unsafe conditions and equipment to their supervisor, complete a facility inspection report when submitted is automatically delivered to our Injury and Illness Prevention Program Administrator and corporate associates.
b. Report all incidents, injuries and illnesses to their supervisor, manager and Zoe Robinette immediately.
c. Keep means of egress unblocked, well-lit, and unlocked during work hours.
d. Sound the alarm and evacuate in the event of fire.
e. Upon hearing fire alarm, stop work and proceed to the nearest clear exit and then gather at the designated muster location.
f. Not attempt to respond to a fire or other emergency unless trained to do so.
g. Keep stairways clear of items that can be tripped over.
h. Not store combustibles under stairways that are egress routes.
i. Not store materials and equipment against doors or exits, fire ladders or fire extinguisher stations.
j. Keep aisles clear at all times.
k. Maintain work areas in a neat, orderly manner. Place trash and refuse into proper waste containers.
l. Wipe up all spills promptly.
m. Store files and supplies in such a manner as to preclude damage to the supplies or injury to personnel when they are moved. Heaviest items should be stored closest to the floor and lightweight items stored above.
n. Ensure all cords running into walk areas are taped down or inserted through rubber protectors to preclude them from becoming tripping hazards.
o. Never stack material precariously on top of lockers, file cabinets or other high places.
p. Never leave desk or cabinet drawers open that present a tripping hazard. Use care when opening and closing drawers to avoid pinching fingers.
q. Not open more than one upper drawer at a time, particularly the top two drawers on tall file cabinets.
r. Always use the proper lifting techniques. Never attempt to lift or push an object which is too heavy. Contact your supervisor when help is needed to move a heavy object.
s. Exercise caution when carrying material to ensure firm footing and clear line of sight.

t. Plug all electrical equipment into appropriate wall receptacles or into an extension of only one cord of similar size and capacity. Three- pronged plugs should be used to ensure continuity of ground.
u. Keep individual heaters at work areas clear of combustible materials such as drapes or waste from waste baskets. Heaters which are equipped with tip over switches should be used.
v. Keep appliances such as coffee pots and microwaves in working order and inspected for signs of wear, heat, or fraying of cords.
w. Ensure fans used in work areas are guarded. Guards must not allow fingers to be inserted through the mesh. All fans must be equipped with proper guards which have openings of ½ inch or less.
x. Use equipment such as scissors, staplers, etc. for their intended purposes only. They are not to be used as hammers, pry bars, screwdrivers, etc. Misuse can cause damage to the equipment and possible injury to the user.
y. Store cleaning supplies away from edible items on kitchen shelves.
z. Store cleaning solvents and flammable liquids in appropriate containers.
aa. Keep solutions that may be poisonous or not intended for consumption in well-labeled containers.
ab. Not remove or deface equipment or product ANSI or other warning signs/symbols and they must heed their warnings.
ac. Ensure owner's manuals for office equipment are readily available.
ad. Ensure a list of hazardous chemicals, and if applicable, SDS are readily available.

The above list is not all inclusive. Employees are encouraged to suggest additional safety ideas and/or procedure site supervisor, managers or to Zoe Robinette, our Safety Director, for inclusion in weekly safety meetings.

Sanitation

§1524. Water Supply.
§1526. Toilets at Construction Jobsites.
§1527. Washing Facilities, Food Handling, and Temporary Sleeping Quarters.

Potable Water:

From a safety standpoint, you must not neglect your need for potable (drinkable) fluids. Water is not only the most abundant of all compounds found on the earth, it is the most abundant part of you -- actually about 65% of you is water.

On construction sites, exertion and heat dictate the need for plenty of water.

Potable water will be available on job sites. If portable containers are used, they will be clearly marked [Potable Water]; capable of being tightly closed; and equipped with a tap. These containers will be used for no other purpose than supplying drinking water. Non-reusable (single service) cups in a sanitary container will be provided drinking as well as a receptacle for disposing of used cups.

Additionally, sealed one-time use water bottles may be supplied. If these items are used, they are for individual use only and will be marked to identify the user. These bottles may not be shared. Where sealed one-time use water containers are supplied, a receptacle for disposing of the used containers will be provided.

Employees are reminded of their need for adequate amounts of water.

Non-Potable Water:

Outlets of non-potable water should be clearly identified as such, through appropriate signage, and non-potable water may never be used for drinking, washing, or cooking.

Toilets:

Note: The following doesn't apply to mobile crews having readily available transportation to nearby toilet facilities.

A minimum of one separate toilet facility will be provided for each 20 employees or fraction thereof of each sex. Such facilities may include both toilets and urinals provided that the number of toilets will not be less than one half of the minimum required number of facilities.

Exception: Where there are less than 5 employees, separate toilet facilities for each sex are not required provided the toilet facilities can be locked from the inside and contain at least one toilet.

Under temporary field conditions, not less than one toilet will be available.

Where the provision of water closets is not feasible due to the absence of a sanitary sewer or the lack of an adequate water supply, non-water carriage disposal facilities will be provided. Unless prohibited by applicable local regulations, these facilities may include privies (where their use will not contaminate either surface or underground waters), chemical toilets, recirculating toilets, or combustion toilets.

Toilet facilities will be kept clean, maintained in good working order, designed and maintained in a manner which will assure privacy and provided with an adequate supply of toilet paper.

Washing Facilities:

Adequate washing facilities will be provided in near proximity to the worksite if employees are working with contaminants that may be harmful to their health such as paint, coatings, or other chemical products. Paper towels and cleansing agents will be provided.

Showers and change rooms will be dictated by specific standards dealing with specific toxic materials (i.e., lead; asbestos).

Eating and Drinking Areas:

No employee will be allowed to consume food or beverages in any area exposed to toxic material.

Manual Lifting Procedures

Specific steps/procedures will be utilized to eliminate the probability of an incident or injury due to manual lifting.

Causes of Manual Lifting Injuries

Some obvious causes of manual lifting injuries could include, but are not limited to:

a. Lifting an item that is too heavy.
b. Lifting an item that is too bulky.
c. An item blocking the line of sight.
d. A sharp item cutting the hands or body.
e. Working on a slippery surface.
f. Bending or twisting while lifting.

However, lifting injuries are also caused by less obvious reasons:

a. Poor physical condition
b. Poor posture
c. Poor judgment (lifting, pulling, pushing an item that is obviously too heavy or awkward without seeking assistance or a mechanical lifting device.)
d. Lack of exercise
e. Excessive body weight

Hazard Controls for Manual Lifting

Hazard controls will be used to prevent manual lifting injuries. The order of precedence and effectiveness of hazard control for manual lifting is as follows:

a. Engineering controls.
b. Administrative controls.
c. Personal protective equipment.

Supervisors will inspect and enforce the use of the above controls.

Engineering controls include the use of mechanical devices such as:

a. Dollies
b. Hand trucks
c. Lift assist devices
d. Jacks
e. Carts
f. Conveyors
g. Lift tables
h. Increasing the heat - muscles are less likely to cramp in warmer temperatures.

Administrative controls include the use of work practices such as:

a. Using two (2) persons to perform a lift.
b. Increasing the time between lifts.
c. Lifting training.

Personal protective equipment includes, but is not limited to:

a. Using gloves to prevent cuts and promote a firm grip and warmth.
b. Appropriate steel toed footwear to prevent slips and protect feet from falling items.
c. Eye protection to prevent items from hitting eyes.
d. Back braces for additional support.

A concentrated effort will be made to ensure that the corrective measures do not create hazards in and of themselves.

Ergonomics & Manual Lifting

Ergonomics is the science of fitting a job to a person to help lessen muscle fatigue, increase productivity, and reduce the number and severity of work-related injuries and musculoskeletal disorders. We will employ the following ergonomic principles to prevent manual lifting injuries in our workplace:

Correct Neutral Postures

Correct neutral posture is where the body is aligned and balanced while sitting or standing. The head is kept upright and is not turned to either side more than about 30 degrees or tilted forward or backward more than about 15 degrees. When the worker is standing, the torso is not bent more than 10 to 20 degrees from the vertical position and the natural curves of the spine are maintained.

The pelvis and shoulders should face straight ahead to avoid twisting the torso. The shoulders are relaxed, and knees slightly bent. The arms hang normally at the side, with elbows close to the body. The elbows are not bent more than about 90 degrees and the palms face in toward each other and the center line of the body. The wrists are in line with the forearms and are not bent sideways, forward (towards the palm), or backward (towards the back of the hand.)

When lifting, every attempt should be made to not put stress on the body which is beyond the correct neutral posture.

Proper Lifting Techniques

Training will be given in proper lifting techniques. Below are lifting techniques that will reduce the likelihood of injury:

a. Lift objects comfortably, not necessarily the quickest or easiest way.
b. Lift, push, and pull with your legs, not your arms or back.
c. When changing direction while moving an object, turn with your feet, not by twisting at the waist.
d. Avoid lifting higher than your shoulder height.
e. When standing while working, stand straight.
f. When walking, maintain an erect posture and wear slip-resistant, supportive shoes.

g. When carrying heavy objects, carry them close to the body and avoid carrying them in one hand.
h. When heavy or bulky objects need to be moved, obtain help or use a mechanical aid such as a dolly, hand truck, forklift, etc.
i. When stepping down from a height of more than eight inches, step down backwards, not forward.
j. Lift heavy objects close to the body -- avoid reaching out. The power zone for lifting is close to the body, between mid-thigh and mid-chest height. Comparable to the strike zone in baseball, this zone is where arms and back can lift the most with the least amount of effort.
k. Lift gradually and smoothly. Avoid jerky motions.
l. Maintain a clear line of vision.

Investigation of Injuries

The Safety Director will investigate all injuries caused by improper lifting and, as part of that investigation, incorporate those finding into work procedures to prevent a reoccurrence.

Injuries will be recorded and reported in compliance with the California Recordkeeping Standard, Section 14300.

Slips, Trips, & Falls

Slips, trips, and falls are among the most common occupational accidents and they are easily preventable.

Causes of Slips, Trips, and Falls

Below are some of the causes of slips, trips, and falls:

a. Running.
b. Engaging in horseplay.
c. Working off a ladder that is not firmly positioned.
d. Carrying an object that blocks the line of vision.
e. Work boots that are not laced or buckled.
f. Working off a scaffold without safety rails.
g. Using ladders that have oil and grease on the rungs.
h. Not using a handrail on steps.
i. Messy work areas with debris strewn about.
j. Not paying attention.

This list could go on and on, but all of the above are easily preventable by adherence to safety and housekeeping procedures, common sense, and awareness of potential hazards.

Prevention of Slips, Trips, and Falls

The following specific procedures will be followed on our worksites to prevent slips, trips, and falls:

a. Where aisles or walkways are required, machinery equipment, parts, and stock will be arranged and spaced so as to provide clear walkways or aisles of not less than 24 inches in width and 6 feet 8 inches clear headroom to a safe means of egress from the building.
b. Permanent aisles, ladders, stairways, and walkways will be kept reasonably clear and in good repair, and free of dangerous depressions, obstructions, and debris. Where, due to lack of proper definition, aisles or walkways become hazardous, they will be clearly defined by painted lines, curbs, or other method of marking.
c. Whenever aisles, walkways, or crawlways become slippery, high-friction surfaces, cleats, coverings, or other equivalent protection against slipping will be used.
d. Permanent floors and platforms will be free of dangerous projections or obstructions, maintained in good repair, and kept reasonably free of oil, grease, or water.
e. Where the type of operation necessitates working on slippery floors, these surfaces will be protected against slipping by using mats, grates, cleats, or other methods which provide equivalent protection. Where wet processes are used drainage will be maintained and false floors, platforms, mats, or other dry standing places provided.

f. Guardrails will be provided on all open sides of unenclosed elevated work locations, such as: roof openings, open and glazed sides of landings, balconies or porches, platforms, runways, ramps, or working levels more than 30 inches above the floor, ground, or other working areas of a building as defined in Section 3207 of the General Industry Safety Orders. Where overhead clearance prohibits installation of a 42-inch guardrail, a lower rail or rails will be installed.

g. Ladders will be carefully selected for the job at hand, regularly inspected, and properly maintained in accordance with Cal/OSHA's Portable Ladder Standard, Section 3276. All employees using ladders will receive training and understand proper procedures for ladder use before using a ladder in a work situation.

h. Our established housekeeping procedures will be followed at all times.

Investigation of Injuries

The Safety Director will investigate all injuries caused by slips, trips, and falls, and, as part of that investigation, incorporate those finding into work procedures to prevent a reoccurrence.

Injuries will be recorded and reported in compliance with the California Recordkeeping Standard, Section 14300.

Drug, Alcohol, & Smoking

Drug Free Workplace

It is the policy of Parking Concepts, Inc to hire only persons free from any evidence of illegal use of controlled substances or other drugs including alcohol.

With the exception of over-the-counter drugs such as aspirin or drugs prescribed by a physician, there will be no drugs or alcohol within our facility. Alcohol and drug abuse cause an unacceptable level of safety hazard not only for the offending employee, but for others in the vicinity. Those found to be under the influence of drugs and/or alcohol will be immediately removed from the work area by the competent person and further disciplinary action will be addressed with corporate human resources department for further actions.

Note: OSHA has determined that drug testing after injuries or illnesses that occur at the workplace can be considered retaliatory or discriminatory, and thus discourage employees from properly reporting the injury or illness. This can be the case in situations where the injury or illness wouldn't have been reasonably expected to be the result of impairment.

Example: A bee sting that results in an allergic reaction and leads to a stay at the hospital. There is not a reasonable belief that a bee sting would be caused by impairment and thus drug testing would be considered retaliatory or discriminatory.

Employees taking prescription medication that reduces motor skills should report this to their supervisor for appropriate work assignment.

Chemical dependency is a devastating problem for not only the employee, but also the employee's family and co-workers. For obvious safety reasons, it cannot be tolerated in the workplace. Those with such a problem should seek professional help, human resources will assist any employee in finding appropriate treatment should they voluntarily come forward.

Smoking

There will be no smoking except in designated smoking areas. Designated smoking areas will not be located in enclosed spaces, including lobbies, lounges, waiting areas, elevators, stairwells, or restrooms that are a structural part of the building.

Under no circumstances will there be smoking during refueling of vehicles, within 50 feet of flammable materials, or in any location where flammable vapors in concentrations greater than 25 percent of the lower explosive limit may reasonably be expected.

To prevent smoking by a nonemployee, we will post clear and prominent signs, as follows:

Where smoking is prohibited throughout the building or structure, a sign stating, “No smoking” will be posted at each entrance to the building or structure.

Where smoking is permitted in designed areas of the building or structure, a sign stating, “Smoking is prohibited except in designated areas” will be posted at each entrance to the building or structure.

Prohibited Behaviors

All employees are strictly prohibited from using, bringing onto company property, possessing, concealing, transporting, promoting, or selling any of the following substances or items:

a. Illegal drugs, unauthorized controlled substances, look-a-likes, designer, synthetic or any other drug which may affect an employee's motor functions or alter a person's working perception.
b. Prescription drugs/over-the-counter medication, except under the following conditions:
    1. The employee must inform his/her supervisor prior to using any prescription drug or over-the-counter medication and receive written permission to possess such drug while working.
    2. The prescription vial must be labeled by the dispensing pharmacy and the label must show the employee’s name, physician, prescription number, date the prescription was filled, and the dosage rate. Prescriptions more than 30 days old will not be allowed.
    3. The over-the-counter medication will be in its original package or container.
    4. The employee may only possess enough medication for his/her normal shift.
c. Alcoholic beverages.
d. Firearms, weapons, explosives, and ammunition.
e. Unauthorized items such as stolen property.

Workplace Violence

According to OSHA, workplace violence is the second leading cause of fatal occupational injuries in the US. It's important that our company have a Workplace Violence Prevention Plan in place to protect our employees. Our prevention plan complies with the amended California Labor Code section 6401.7 and the newly codified California Labor Code section 6401.9. Our Safety Director, Zoe Robinette, will ensure that our prevention program is implemented across the company no later than July 1, 2024, and retrained annually.

To successfully implement this prevention plan, participation is required of all employees, regardless of their position within the company.

Workplace violence can be defined as "any act of violence or threat of violence that occurs at the work site." The term workplace violence does not include lawful acts of self-defense or defense of others. Workplace violence includes the following:

a. The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury; and
b. An incident involving the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury. Cal/OSHA identifies four types of workplace violence:

Types of workplace violence:

Type 1: Workplace violence committed by a person who has no legitimate business at the work site and includes violent acts by anyone who enters the workplace with the intent to commit a crime.

Type 2: Workplace violence directed at employees by customers, clients, or visitors.

Type 3: Workplace violence against an employee by a present or former employee, supervisor, or manager.

Type 4: Workplace violence committed in the workplace by someone who does not work there but has or has been known to have had a personal relationship with an employee.

<u>Site Assessments</u>

An assessment will be conducted to help with the development of a site-specific plan to be used in the event of a workplace violence incident. A competent person will develop the plan with help and input from other employees and/or employers. We encourage all employees to provide any input they may have regarding our prevention plan, including how to handle and respond to an incident.

On sites with other contractors, we will work with them to determine what the best policies and procedures are for the site. A joint plan will ensure that all employees respond in the same manner should an incident occur.

Site assessments will be performed when starting work at a new site/facility, when deficiencies are found in the assessment, after an incident occurs, and during scheduled intervals.

The final site assessment will be communicated to all employees and made available for review upon request. A copy of the assessment will be maintained at the work site at all times.

Communication

Employees will participate in a workplace violence training course. Our company will also utilize safety meeting/toolbox talks to discuss and answer questions about workplace violence issues. Employees are encouraged to speak to management if they have any questions or concerns about our Workplace Violence Prevention Plan.

Controls

When possible and applicable, we will implement recommended engineering and administrative controls to prevent or reduce the likelihood of all types of workplace violence. Some of these controls may include, but are not limited to:

a. Lighting controls.
b. Surveillance (e.g., cameras, mirrors).
c. Establishing a good relationship with local police.
d. Train on specific workplace violence events, such as responding to an active shooter.
e. Performing appropriate background checks and reference verification on new hires.
f. Lock exterior doors to prevent unwanted entry; never prop open locked doors.

Emergency Response Protocols

Depending on the circumstances of a workplace violence incident, employees may need to either evacuate the premises or shelter-in-place. During an evacuation of a site, employees should use the emergency evacuation routes that are posted around the site. If an evacuation is required, all employees must be accounted for. Once in a safe location, 911 or the local police will be contacted immediately.

Training

All current employees will receive workplace violence training to learn how to identify it and respond accordingly. All new hires will be required to take the workplace violence training prior to beginning work at a site. Retraining will be required annually after initial training. The workplace violence training will include at a minimum:

a. Explanation of the prevention plan; and
b. Definitions and requirements of Labor Code section 6401.9; and
c. Different types of workplace violence incidents; and
d. Process for reporting workplace violence incidents; and
e. Job-specific violence hazards and preventative measures; and
f. Reason for the violent incident log and how they may obtain related records; and
g. Emergency response protocols; and
h. Opportunity to discuss and ask questions about the prevention plan.

Additional training will be provided when a new or previously unrecognized workplace violence hazard has been identified.

Reporting

Employees should immediately inform management of any workplace violence incident they have been the victim of or have witnessed. Parking Concepts, Inc strictly prohibits any retaliation against an employee reporting a workplace violence incident.
The incident will be investigated, and all findings will be documented.

Investigation

Investigations will be conducted by our Safety Director, Zoe Robinette. The investigation process will consist of the following:

a. Completion of a Violent Incident Log; and
b. Collect any additional information relevant to the incident; and
c. Determine what corrective actions need to be taken; and
d. Implement and enforce the corrective action(s); and
e. Determine how the incident could be avoided in the future; and
f. Update policies and procedures, if needed; and
g. If updates are made to the plan, communicate the updated policies and procedures to all employees; and
h. Retain all investigation information records.

Violent Incident Log

Parking Concepts, Inc will maintain a Violent Incident Log for all reported cases. The logs will include the following:

a. Incident date, time, and location; and
b. Workplace violence “Type” (1, 2, 3, and/or 4); and
c. Detailed description of the incident; and
d. Identification of who committed the violence; and
e. The circumstances at the time of the incident; and
f. Specific incident characteristics, including but not limited to:
    1. Physical attacks; or
    2. Weapon attacks; or
    3. Threats; or
    4. Sexual assault; or
    5. Animal incidents
g. The results of the incident, including whether law enforcement was involved; and
h. The steps that were taken to protect employees from further threats or hazards; and
i. Information about the person completing the log, including name, job title, and the date completed.

All violent incident logs will be maintained for a minimum of 5 years.

Note: No personally identifiable information (PII) will be included in the log that would identify any person involved in the incident.

Additional Incident Information

There may be additional information that needs to be collected and recorded as part of the investigation. Additional incident information includes police reports, medical reports, photos/videos, witness interviews and any other documentation that may be relevant to the investigation.

Corrective Actions

During the investigation it will be determined what corrective action needs to be taken. Corrective actions will vary depending on the type of incident that occurred.

When an employee or employees have been found to have committed an act that is considered a violent incident they will be reprimanded. Employee reprimands will range from written warnings up to and including termination. In severe cases, local law enforcement may also be involved.

Incidents that are caused by an outside source are incidents that were not committed by an employee. The incident may be caused by several potential outside sources, from an acquaintance of an employee to a random stranger to a wild animal. The corrective actions for these types of events may include, but are not limited to, increased site security, restraining orders, or securing small access areas from animals.

All corrective actions taken will be communicated to the employees.

Avoiding Future Incidents

Upon completing the review of the information regarding a workplace violence incident, we will determine the best way to prevent the same or similar type of incident from occurring again. All updates will be implemented immediately and communicated to employees as soon as possible.

Periodic Review of Plan

Our workplace violence policies and procedures will be evaluated at least annually to ensure that the program continues to be as effective as possible. If there are any deficiencies found in our policies or procedures, they will be updated and corrected immediately. Any updates made to the program will be communicated to all employees in a timely manner.

Emergency Action Plan

An emergency is a sudden unforeseen crisis, usually involving danger, which calls for immediate action. It is a situation that can directly or indirectly affect a single employee, an entire workplace, or impact a whole community. Emergencies can happen before, during, or after work hours and be caused by a range of events and hazards involving both nature and people.

Workplaces in California are at risk for many different types of emergencies including, natural disasters (earthquakes, floods); extreme weather (storms, heat); fires (building fires, wildfires); chemical or hazardous material spills or releases; major transportation or vehicle accidents (involving trucks, buses, cars, forklifts, etc.); incidents of violence; bomb threats; medical emergencies; employee deaths (suicide, homicide, unintentional or natural);acts of terror; and outbreaks of disease or infections (HINI virus).

Our workplace may be at risk for some of the emergency situations listed above. These sets of events fall under our Emergency Action Plan, which meets a multitude of objectives unique to the needs of our workplace and our employees.

The first and foremost objective is the safety of all our personnel. To achieve this level of safety, our plan is designed to get personnel away from danger, treat injury, and provide for a thorough and accurate accounting of all employees.

There may well be situations where certain employees, trained in first aid and/or firefighting procedures, may prevent a small emergency situation from becoming a major disaster. In these types of situations, these employees, identified in this plan, will remain to perform the function for which they are trained provided they may, in their judgment, perform these duties in a safe manner. At no time will any employee put himself/herself at risk.

A copy of this plan will be posted and, like all safety materials, will be readily available for review. Emergency escape route diagrams and emergency telephone numbers will be posted with the plan.

All exits will be identified with a sign having the word "EXIT" plainly legible. Exit signs will be suitably illuminated. Doors, passageways, stairs, etc., which appear to be an exit but are not will be identified by a sign that reads, for example, "Not an Exit." Aisles and passageways will be kept clear to provide a direct, easy egress from our facility.

It is important that the actual implementation of this plan be simple, direct, and carried out without confusion. Each employee will know how to alert others, how to call for assistance, the location of fire extinguishers, the escape route, the rendezvous point (in order to be accounted for so that others do not put themselves at risk looking for a person who has already reached safety), and specific tasks that may be required of specific personnel during emergency procedures.

Our emergency action plan will be reviewed annually and revised if necessary.

Additionally, any employee who needs or wants more information on our Emergency Action Plan or their specific duties may contact their site supervisor, district, regional or corporate managers.
When working at a client’s facility, our personnel will fall under the provisions of their emergency action plan. All employees will be trained on the client plan and have complete understanding of PCI plan and how it interacts with the site plan.

The following are standard operating procedures:

Calling for Emergency Medical Response

Should an injury occur that requires an emergency medical responder, the below listed actions will be taken in the order given:

a. Call the emergency response number posted adjacent to this plan.
b. Call the Safety Director as soon as you are free to do so – 415-806-9348.
    1. Help will immediately be sent, and a person will be designated to direct the emergency responders to the injured person.
    2. If appropriate, Safety Data Sheets (SDS) will be provided to the emergency responders.
c. Provide any medical assistance you are trained and certified to do. Do not provide any medical assistance you are not trained to do.
d. To ensure proper equipment for transportation of the injured person to a physician or hospital, calling the posted emergency phone numbers on a cell phone will be used as the communication system.
e. If an employee must go to a medical facility for treatment, a member of management will accompany him/her.

Assigned First Aid Providers

Names:

_____

_____

_____

_____

Note: If none, enter "None."

Reporting a Fire or Other Emergency

The phone number of the local fire department and emergency services will be posted with other emergency numbers.

If a fire should occur, all personnel and the local fire department will be notified. As in all emergency situations, per the American Trauma Society, people calling the fire department should:

a. Remain calm.
b. Speak clearly and slowly.
c. Give the exact location.
d. Describe the situation.
e. Give the phone number from where you are calling.
f. Do not hang up until told to do so.

Alarm Systems

An employee alarm system that has a distinctive signal for each purpose and provides warning for necessary emergency action has been installed and will be properly maintained and certified as required. The employee alarm is capable of being perceived above ambient noise or light levels by all employees in the affected portions of the workplace. If applicable, tactile devices will be used to alert those employees who would not otherwise be able to recognize the audible or visual alarm.

Thorough testing of alarms will be conducted by competent persons every two months and alarms will be repaired or replaced immediately if any deficiencies are found. Manually operated actuation devices for the alarms are unobstructed, conspicuous, and readily accessible. In the event of loss of electricity, an emergency back-up system, such as an air horn or megaphone, will be used to alert employees.

Facility Evacuation Plan

In case of Fire/Explosion/Severe Weather/Mechanical Failure, etc., the order to evacuate will be given by:

_____

(Example: fire bell; three (3) blasts of an air horn; public announcement, etc.)

Note: A distinctive signal will be identified for each type of emergency notification.

To alert others:

_____

(Example: activate alarm; notify main office, extension number, etc.)

Location of fire extinguishers, nearest listed first:

_____ _____

(Type) (Location)

_____ _____

(Type) (Location)

_____ _____

(Type) (Location)

Rendezvous Point

_____

(Example: parking lot; by dumpster, etc.)

Specific Hazards to be aware of:

_____

(Example: List nearby hazardous chemicals. If none, enter "none")

Evacuation Route

A map or schematic drawing of the evacuation route will be posted.

Roster of Personnel with Specific Duties During an Evacuation

Employees who will remain to operate critical operations before they evacuate will be trained in the proper procedures to perform their duties.

Name	Title	Duties

Note: Examples of specific duties: deenergizing certain equipment or machinery; accounting for personnel at rendezvous point; manning fire extinguishers; directing emergency responders; on alert for First Aid delivery; rescue team member; etc. If none, enter "None."

Emergency Rescue/Medical Duties

Our employees are not to perform emergency rescue or emergency medical duties. These duties will be performed by personnel with expertise in these areas.

Training

Training and/or review of our emergency action plan will be accomplished upon initial assignment to a job, when an employee's responsibilities under the plan change, and when the plan itself is changed.

Additionally, certain persons will be given additional training in the safe and orderly evacuations of other employees. These persons will be essentially "competent persons" as their duties relate to the emergency action plan.

Training for each employee will include the preferred means of reporting emergencies, such as manual pull box alarms, public address systems, radio or telephones. All employees will know how to safely get away from danger and to be properly accounted for.

Note: As a matter of policy, per §1510. Safety Instructions for Employees:

- **a. When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.**
- **b. The employer will permit only qualified persons to operate equipment and machinery.**
- **c. Where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.**

Fire Prevention Plan

Fire prevention deals not with handling a fire emergency, but rather preventing a fire in the first place. Per California Standard 3221, we have established the following written fire prevention plan, which will be kept in the workplace and made available for employee review.

Upon initial assignment, we will train our employees in those parts of the fire prevention plan which they must know to protect themselves in the event of an emergency and apprise them of the fire hazards of the materials and processes to which they are exposed.

To reduce the likelihood of a fire, all personnel are to adhere to the following rules:

a. Smoking of tobacco products in an enclosed space at a place of employment is prohibited.

   Note: "Enclosed space" includes lobbies, lounges, waiting areas, elevators, stairwells, and restrooms that are a structural part of the building

   Note: To prevent smoking by a nonemployee, we will post clear and prominent signs, as follows:

   Where smoking is prohibited throughout the building or structure, a sign stating, "No smoking" will be posted at each entrance to the building or structure.

   Where smoking is permitted in designed areas of the building or structure, a sign stating, "Smoking is prohibited except in designated areas" will be posted at each entrance to the building or structure.

b. All chemical products will be handled and stored in accordance with the procedures noted on their individual SDS.

c. Heat producing equipment will be properly maintained and operated per the manufacturer's instructions to prevent accidental ignition of combustible materials.

d. Precautions will be taken when working with an open flame (such as welding) and areas where these activities occur will be made fire safe by removing or protecting combustibles from ignition.

e. Combustible liquids will be stored in containers meeting the requirements of Chapter 1, Title 49, of the *Code of Federal Regulations (DOT Regulations)*, or NFPA No. 386, *Standard for Portable Shipping Tanks*.

f. Chemical spills will be cleaned up immediately using the proper procedures. This is particularly important for combustible and reactive liquids. Damaged chemical containers and cleanup materials will be properly disposed of.

   Note: Exercise care! Information on appropriate personal protective equipment; proper disposal; proper cleanup procedures; required ventilation, etc. is found on the product's SDS.

g. Combustible liquids and trash will be segregated and kept from ignition sources. The following personnel will be responsible for the control of accumulation of flammable or combustible waste materials:

   Name and Job Title

   _____

   _____

h. The storage of flammable or combustible liquids in containers or portable tanks will comply with California Standard Sections 5531 through 5543.
i. Clear access to fire hydrants and portable fire extinguishers will be maintained at all times.
j. Our established good housekeeping practices will be followed.

In addition, personnel will be notified by their supervisor of the following unusual existing fire hazard conditions:

Hazard	Fire Prevention Methods
_____	_____
_____	_____
_____	_____

Note: If none, enter "None."

Portable Fire Extinguishers

All personnel will receive instruction on portable fire extinguishers to include general principles of use, the hazards involved in the incipient state of firefighting, inspection, maintenance, and location. This training will be given prior to initial job assignment and at least annually thereafter.

a. Fire extinguishers will be visually inspected monthly for general condition and adequate charge and a record of the inspections will be maintained. They will be serviced and certified by qualified personnel at least annually.
b. Stored pressure dry chemical extinguishers that require a 12-year hydrostatic test will be emptied and subjected to applicable maintenance procedures every 6 years by trained persons with suitable testing equipment and facilities. Tests will meet the requirements of California Standard Section 6151(f).
c. Alternate equivalent protection will be provided when portable fire extinguishers are removed from service for maintenance and recharging.
d. Portable fire extinguisher locations will be clearly identified and easily accessible.

Portable fire extinguishers will be distributed as indicated below:

Class	Distribution	Notes
A "A" on a green triangle	75 feet or less travel distance between the employee and the extinguisher	For use on wood, paper, trash, etc.
B "B" on a red square	50 feet or less travel distance between hazard area and the extinguisher	For use on flammable liquid, gas, etc.
C "C" on a blue circle	Based on the appropriate pattern for the existing Class A or Class B hazards	For use on electrical fires
D "D" on a yellow star	75 feet or less travel distance between the combustible metal working area and the extinguisher or other containers or Class D extinguishing agent	For use on combustible metals

Appropriate portable fire extinguishers will be used, as noted above. Supervisors will ensure that at least one extinguisher is on each floor of a project near the stairway.

Using the wrong fire extinguisher on some fires can actually spread the fire. Using a Type A extinguisher on an electrical fire, for example, could cause serious injury. When a fire occurs, it is imperative to use the proper extinguisher.

Fire Protection

We will familiarize our local fire department with our facilities and location and notify them of specific hazards on our site.

The phone number of the local fire department will be posted with other emergency numbers.

If a fire should occur, all personnel and the local fire department will be notified. As in all emergency situations, per the American Trauma Society, people calling the fire department should:

a. Remain calm.
b. Speak clearly and slowly.
c. Give the exact location.
d. Describe the situation.
e. Give the phone number from where you are calling.
f. Do not hang up until told to do so.

Fire Alarms

As described in our Emergency Action Plan, an employee alarm system that has a distinctive signal for each purpose (including fires) and provides warning for necessary emergency action has been installed and will be properly maintained and certified as required. The employee alarm is capable of being perceived above ambient noise or light levels by all employees in the affected portions of the workplace. If applicable, tactile devices will be used to alert those employees who would not otherwise be able to recognize the audible or visual alarm.

Thorough testing of alarms will be conducted by competent persons every two months and alarms will be repaired or replaced immediately if any deficiencies are found. Manually operated actuation devices for the alarms are unobstructed, conspicuous, and readily accessible. In the event of loss of electricity, an emergency back-up system, such as an air horn or megaphone, will be used to alert employees.

First Aid & First Aid Kits

Should a medical emergency occur, other than minor scrapes and bruises, and it is serious enough to call for professional medical assistance, the job site supervisor will ensure the Emergency Response Numbers [physicians/ hospital/ambulance] are posted on the job site bulletin board and ensure the injured employee is safely and promptly, transported to professional medical care. The office will be notified as soon as the medical crises is resolved. The job site supervisor will ensure that in areas where 911 is not available, the telephone numbers of physicians, hospitals, or ambulances are conspicuously posted.

Before the first aid providers arrive, to the extent possible, clear the way so they can reach the injured employee in the most direct way possible.

If our employees are working at a location that is more than 3 or 4 minutes from medical assistance, we will utilize designated first aid providers who are trained and licensed in CPR/first aid and have completed training as required by our bloodborne pathogen program. A Red Cross trained first aid provider will be on all job sites. Other employees will not expose themselves to blood or other bodily fluids of other employees at any time.

Per California Standard Section 14300.7 (b)(5)(B), first aid is limited to:

a. Using a nonprescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
b. Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);
c. Cleaning, flushing or soaking wounds on the surface of the skin;
d. Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc. are considered medical treatment);
e. Using hot or cold therapy;
f. Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
g. Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, backboards, etc.);
h. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
i. Using eye patches;
j. Removing foreign bodies from the eye using only irrigation or a cotton swab;
k. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
l. Using finger guards;
m. Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or
n. Drinking fluids for relief of heat stress.

If an employee is injured and emergency responders have been called, stay calm and reassure the injured employee that help is coming.

Below is basic first aid for various common job site injuries. Mostly, it is what not to do.

MINOR BURNS

(Redness or blisters over a small area)

Flush with cold water; apply a sterile dressing.

Do not use butter on any burn.

Do not break open blisters.

MAJOR BURNS

(White or charred skin; blisters and redness over a large area;
burns on face, hands, or genital area)

Cover with sterile dressing and seek medical attention promptly.

Do not apply salves, ointments or anything else.

Do not break blisters.

CHEMICAL BURNS

(Spilled liquid or dry chemical on skin)

Liquid - Flush with large amounts of water immediately. (Keep water flow gentle).

Dry Brush as much off as possible before flushing with water. After flushing at least 5 minutes, cover with sterile dressing.

Seek medical attention promptly.

Do not use anything but water on burned area.

Do not break open blisters.

EYE - FOREIGN OBJECT

(Object visible; feeling of something in the eye)

Have patient pull upper eyelid over lower eyelid.

Run plain water over eye.

If object does not wash out, cover <u>both</u> eyes with a gauze dressing.

Seek medical attention promptly.

Do not rub the eye.

EYE - WOUNDS

(Wound on eyelid or eyeball; pain; history of blow to eye area; discoloration)

Apply loose sterile dressing over both eyes.

Seek medical help immediately.

For bruising, cold compress or ice pack may relieve pain and reduce swelling.

Do not try to remove any embedded object.

Do not apply pressure to eye.

EYE - CHEMICAL BURN

(Chemical splashed or spilled in eye)

Flush immediately with water over open eye for at least 10 minutes

(20 minutes if alkali). It may be necessary to hold patient's eyelid open.

Note: In work situations where a possibility of eye (or body) exposure to corrosive materials exists, suitable facilities for quick-drenching or flushing will be provided in the immediate work area.

Cover both eyes with sterile dressing.

Seek medical help immediately.

Do not put anything but water in eye.

HEAT EXHAUSTION

(Fatigue; weakness; profuse sweating; normal temperature;
pale clammy skin; headache; cramps; vomiting; fainting)

Remove from hot area.

Have victim lay down and raise feet. Apply cool wet cloths.

Loosen or remove clothing.

Allow small sips of water if victim is not vomiting.

HEAT STROKE

(Dizziness; nausea; severe headache; hot dry skin;
confusion; collapse; delirium; coma and death)

Call for immediate medical assistance.

Remove victim from hot area.

Remove clothing. Have victim lay down.

Cool the body (shower, cool wet cloths)

Do not give stimulants.

First Aid Kits:

To ensure that first aid kits have the proper contents, the kits will be checked before being sent out to each jobsite by the site manager who will ensure they keep it up to date.

First aid kits are worthless if not readily accessible. Therefore, they will not be locked up on job sites. They're also not very valuable if the items you need are missing. It's very important that the kits have the proper items and that they are replenished as they are used. First aid kits will be inspected at least weekly by the designated site manager.

OSHA defers to ANSI for determining what qualifies as an acceptable first aid kit for the workplace. The ANSI standard that addresses first aid kits is ANSI/ISEA Z308.1-2015. Two important topics covered in this standard are what items are required to be included in a first aid kit: Class, and in what kind of container the kit is kept: Type.

Class

There are two classes of first aid kits: Class A and Class B. The two classes are divided based on the type of first aid items included and the number of those items available in the kit. ANSI has defined the classes as follows:

Class A first aid kits are intended to provide a basic range of products to deal with the most common types of injuries encountered in the workplace including: major wounds, minor wounds (cuts and abrasions), minor burns and eye injuries.

Class B first aid kits are intended to provide a broader range and quantity of supplies to deal with injuries encountered in more populated, complex and/or high-risk work environments.

The biggest difference between the classes of first aid kits is the number of items included in the kit. Class B kits have more of each item and are needed at a workplace that has many workers.

Keep in mind that sterile items will be individually wrapped, sealed, and used only once. Other items, such as tape or scissors, can be reused and should be kept clean.

The supplies consumed in first aid kits can actually be used as a measure of safety. For example, if a kit constantly needs replacement of bandages used for minor cuts, there is an obvious problem. Why are cuts happening in the first place? Actual trends can be established, and corrective procedures initiated, such as a protective glove requirement or improved handling practices.

Remember, improper medical treatment can be more dangerous than no treatment at all. Only provide care that you have been trained and certified to do.

Below are the required contents, items and quantities of Class A and B first aid kits:

Class A	Class B
16 Adhesive Bandage 1 x 3 in.	50 Adhesive Bandage 1 x 3 in.
1 Adhesive Tape 2.5 yd (total)	2 Adhesive Tape 2.5 yd (total)
10 Antibiotic Application 1/57 oz	25 Antibiotic Application 1/57 oz
10 Antiseptic 1/57 oz	50 Antiseptic 1/57 oz
1 Breathing Barrier	1 Breathing Barrier
1 Burn Dressing (gel soaked) 4 x 4 in.	2 Burn Dressing (gel soaked) 4 x 4 in.
10 Burn Treatment 1/32 oz	25 Burn Treatment 1/32 oz.
1 Cold Pack 4 x 5 in.	2 Cold Pack 4 x 5 in.
2 Eye Covering w/ means of attachment 2.9 sq. in.	2 Eye Covering w/ means of attachment 2.9 sq. in.
1 Eye/Skin Wash 1 fl oz total	1 Eye/Skin Wash 4 fl. oz. total
1 First Aid Guide	1 First Aid Guide
6 Hand Sanitizer 1/32 oz	10 Hand Sanitizer 1/32 oz
2 pr Medical Exam Gloves	4 pr Medical Exam Gloves
1 Roller Bandage 2 in. x 4 yd	2 Roller Bandage 2 in. x 4 yd
1 Scissors	1 Roller Bandage 4 in. x 4 yd
2 Sterile pad 3 x 3 in.	1 Scissors
2 Trauma pad 5 x 9 in.	1 Splint
1 Triangular Bandage 40 x 40 x 56 in.	4 Sterile pad 3 x 3 in.
	1 Tourniquet
	4 Trauma pad 5 x 9 in.
	2 Triangular Bandage 40 x 40 x 56 in.

Type

As important as the contents are, the first aid kit won't be very useful if it's not properly protected from the workplace environment. It the supplies are soaked from rain or smashed from being tossed around, they just won't be able to provide any help when needed. ANSI has addressed this by providing guidelines for the containers that first aid kits can be stored in at the workplace.

They are broken down into four categories: **Type I, Type II**, **Type III**, & **Type IV.** Here are the descriptions that ANSI provides for each type.

Type I first aid kits are intended for use in stationary, indoor settings where the potential for damage of kit supplies due to environmental factors and rough handling is minimal. Type I first aid kits will have a means for mounting in a fixed position and are generally not intended to be portable.

Note: Typical applications for Type I first aid kits may include, but are not limited to, the following: general indoor use, an office setting or a manufacturing facility. First aid cabinets would generally fall into the Type I classification.

Type II first aid kits are intended for portable use in indoor settings where the potential for damage of kit supplies due to environmental factors and rough handling is minimal.

Note: Typical applications for Type II first aid kits may include, but are not limited to, the following: general indoor use, an office setting or a manufacturing facility.

Type III first aid kits are intended for portable use in mobile, indoor and/or outdoor settings where the potential for damage of kit supplies due to environmental factors is not probable. Type III kits will have a means to be mounted in a fixed position and will have a water-resistant seal.

Note: Typical applications for Type III first aid kits may include general indoor use and sheltered outdoor use.

Type IV first aid kits are intended for portable use in the mobile industries and/or outdoor settings where the potential for damage to kit supplies due to environmental factors and rough handling is significant. Type IV kits will have a means to be mounted in a fixed position and will meet the performance requirements set forth by ANSI.

Note: Typical applications for Type IV first aid kits may include, but are not limited to, the following: the transportation industry, the utility industry, the construction industry, and the armed forces.

When dealing with any injury, stay calm and never do anything unless you know what you are doing. **Improper medical treatment can be more dangerous than no treatment at all.**

Incident Investigation & Reporting

Apparently simple accidents may actually be caused by many complex reasons. For example, a worker is using a claw hammer on a scaffold plank more than six feet above the ground. The hammer head breaks off, slides off the scaffold surface, and strikes a worker standing below who is not wearing a hard hat.

Why did this accident happen? How can it be prevented? With just the facts presented, the fault would seem to rest with the worker who was struck by the falling object. Accident investigation may reveal other contributing factors by answering questions like:

a. Were hard hats required on the project, were they available, and was this policy enforced by the supervisors?
b. Were precautions taken to prevent objects from falling from above, such toeboards?
c. Did the worker inspect his hammer before use? Was he driving nails -- the job for which a claw hammer is designed -- or pounding metal beams?
d. Why was the worker directly under the scaffold? Was he authorized to be there? Had a control zone been established? What was he doing when he was hit?

The Safety Director will investigate all workplace accidents, injuries, illnesses, and hazardous substance exposures. Our procedures for investigation include:

a. Visiting the accident scene as soon as possible;
b. Interviewing injured workers and witnesses;
c. Determining the cause of the accident/exposure;
d. Taking corrective action to prevent the accident/exposure from reoccurring;
e. Identifying and addressing the underlying factors that may have contributed to the incident; and
f. Recording the findings and corrective actions taken.

The main purpose of incident investigation is to prevent the same type of incident from reoccurring. An incident investigation will begin immediately after the medical crisis is resolved.

Near-miss mishaps, events which result in no injury or damage, should be investigated because even though the outcomes are different, the causes are the same.

If the accident is severe, all personnel are authorized to call 911 and/or access a first responder per our posted job site emergency phone lists.

All accidents, incidents, and near-miss incidents will be reported immediately to the supervisor who, in turn, will report this information immediately to Zoe Robinette, our Safety Director.

Zoe Robinette will ensure the accident, incident, or near-miss incident is documented as soon as feasible, but no later than 24 hours. Incidents would include, but not be limited to:

a. injuries
b. spills
c. property damage
d. fires
e. explosions
f. vehicle damage

Immediately after medical concerns are addressed, all accidents, incidents and near-miss incidents will be investigated.

Catastrophic Reporting Requirements:

Within eight (8) hours after the death of any employee from a work-related incident or the in-patient hospitalization of three (3) or more employees as a result of a work-related incident, either in person or by telephone, the OSHA Area Office nearest to the site of the incident will be notified. Phone Numbers of nearest Cal/OSHA District Offices, ***CLICK HERE***.

Incident Investigation:

Zoe Robinette, and risk department is responsible for assisting the site managers in investigating all incidents. An investigating team will be established, and individual members will be given training in their individual responsibilities and incident investigation techniques prior to the occurrence of an incident.

Initial training will be given when assigned to the team and refresher training will be given as needed, but at least bi-annually.

Training will include:

a. Initial identification/assessment of evidence.

   As appropriate, a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc. will be gathered.

b. Collection, preservation, and security of evidence.

   Using notes, photographs, witness statements, flagging, and impounding of documents and equipment, evidence will be collected, preserved, and secured.

c. Collection of witness interviews and statements.

   The importance of gathering unbiased statements and the possible need for follow-up interviews will be emphasized.

d. Preparation, and preservation, of the written incident report.

   The written incident report will be prepared using the incident report form which would include a detailed narrative statement of the events leading to the incident. The format of the narrative report may include an introduction, methodology, and summary of the incident; the investigation board members names, narrative of the event, findings and recommendations. Photographs, witness statements, drawing, etc. would also be included.

e. Using investigative skills to identify corrective actions, assigning responsibilities for corrective actions, and tracking corrective actions to closure.

An investigative kit will be prepared that contains:

a. Incident Investigation Forms
b. Witness Statement Forms
c. Pens, paper, rulers
d. Barricade tape
e. Camera
f. Small hand tools
g. Marking devices such as flags
h. Tape Recorder
i. Equipment Manuals and Standards

Per our Bloodborne Pathogen Program, all first aid responders will be qualified and certified in First Aid and CPR.

Per our Emergency Action Plan, persons will be identified, in the event of a major emergency to perform certain tasks to ensure the safety of our personnel as well as the integrity of equipment, facilities, and materials to prevent further loss after immediate rescue has occurred. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special requirements such as safe rendering of hazardous materials or explosives will be employed.

At the end of any accident investigation, a meeting will be held with all team members to review the process and entertain suggestions for improvement. Training will include, but not be limited to, investigation procedures, preserving of evidence, taking appropriate photos of accident scenes, first responder actions and results, witness statements, and use of investigative supplies.

While all accidents must be investigated, the degree to which they are investigated must be commensurate with the level of severity of the incident using a root cause analysis process.

Root cause analysis, in the example on page 1, is a methodology for finding and correcting the most important reasons for the accident. Utilizing scaffolding competent persons and other experts, the root cause may turn out to be lack of scaffold training with emphasis on scaffold erection. Had toeboards been installed, the accident would not have happened, and with enhanced training, future accidents could be avoided.

This answer is different than the obvious conclusion that the accident was caused by the hammer head breaking off and hitting the employee.

Accidents with a high degree of severity certainly need more investigative time and effort than, for example, a minor bruise.

After all is said and done, one of the main purposes of incident investigation is to prevent a reoccurrence particularly in the performance of similar type operations. It is important to communicate to all employees the lessons learned from an incident investigation and make sure they understand the existing or improved policies and/or procedures established as a result of the incident investigations.

Recordkeeping: Injuries & Illnesses

California Recordkeeping Standard, Section 14300

As a matter of law, all employers with 11 or more employees **at any one time** in the previous year must maintain Cal/OSHA Form 300, *Log of Work-Related Injuries and Illnesses*, Cal/OSHA Form 301, *Injury and Illness Incident Report*, and OSHA Form 300A, *Annual Summary of Work-Related Injuries and Illnesses*.

Cal/OSHA Forms 300 and 301 are used to record and classify occupational injuries and illnesses. The information on the Cal/OSHA Form 300 is related to employee health and must be used in a manner that protects the confidentiality of the employees to the extent possible. Recordable injuries and illnesses must be entered on Cal/OSHA Forms 300 and 301 within seven (7) days of receiving information that a recordable injury or illness has occurred.

Electronic Submission of Records

Effective February 25th, 2019, certain employers are required to electronically submit injury and illness data from their Cal/OSHA Form 300A Summary of Work-Related Injuries and Illnesses to OSHA. This includes all employers with 250 or more employees and employers with 20-249 employees who have a NAICS code listed in Appendix A to Subpart E of Part 1904 - Recording and Reporting Occupational Injuries and Illness. *Click here to see Appendix A*.

Note: Contact your local worker's compensation office if you're uncertain of your NAICS code.

If Parking Concepts, Inc is required to submit records electronically, the information from our 300A must be submitted by March 2 of the following year (for example, 2018 data must be submitted by March 2, 2019).

OSHA provides a secure website that offers three options for data submission:

a. Users will be able to manually enter data into a webform.
b. Users will be able to upload a CSV file.
c. Users will have the ability to transmit data electronically via an API if they have an automated recordkeeping system.

Click Here to Access the Injury Tracking Application

Effective January 1st, 2024, if our company exceeds 100 or more employees at any time during the year, we will be required to submit our OSHA Form 300 Log and OSHA Form 301 Incident Report to OSHA the following year, no later than March 2nd. (Example: If we had 107 employees at some point during 2023, we would be required to submit the OSHA 300 LOG and 301 no later than March 2nd, 2024)

The information is to be uploaded to the same OSHA Injury Tracking Application as the OSHA 300 Log Summary, using the link above.

Information that should be included in the OSHA 300 Log and 301 are date, physical location, and severity of the injury or illness; details about the worker who was injured; and details about how the injury or illness occurred.

Retention of Forms:

Old Cal/OSHA Forms 101 and 200, as well as Cal/OSHA Forms 300, 300A, and 301, will be retained for five years following the year to which they relate.

Items to be Recorded on Cal/OSHA Forms 300, 300A and 301:

Work related injuries and illnesses and fatalities are to be recorded using the criteria found in *Recording Criteria, 14300.4*.

Injuries and illnesses must be recorded if they result in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, or if the injury or illness involves a significant injury diagnosed by a physician or licensed health care professional even if it does not meet the forgoing conditions.

Note: First aid (which is not reportable) is defined in General Recording Criteria, 14300.7.

Employee Involvement:

As an employee of Parking Concepts, Inc , you have the right and responsibility to report all work-related injuries and illness without the fear of being retaliated against, discriminated against, or terminated from employment.

Note: OSHA has determined that drug testing after injuries or illnesses that occur at the workplace can be considered retaliatory or discriminatory, and thus discourages employees from properly reporting the injury or illness. This can be the case in situations where the injury or illness wouldn't have been reasonably expected to be the result of impairment.

Example: A bee sting that results in an allergic reaction and leads to a stay at the hospital. There is not a reasonable belief that a bee sting would be caused by impairment and thus drug testing would be considered retaliatory or discriminatory.

As a matter of policy, all employees are to report all work-related accidents and injuries immediately to the competent person/supervisor on a job site. The competent person/supervisor will contact Zoe Robinette immediately and she will assist in next steps and in completion of an accident investigation form and when submitted it will be received by human resources, corporate and regional management team.

Zoe Robinette will extrapolate appropriate information for completion of the Cal/OSHA Form 300 and complete a review of our policies and procedures to help ensure that there isn't any recurrence of the reported injury or illness.

Cal/OSHA standards require keeping records of the steps taken to establish and maintain the injury and illness prevention program, including records of the scheduled and periodic inspections to identify hazardous conditions and work practices, and documentation of the safety and health training given to employees. These records will be kept for at least one year.

Failure to report injuries or illnesses would be a violation of our company's reporting policy and is not acceptable.

Catastrophic Reporting Requirements:

Any serious injury, illness, or death of an employee [occurring in a place of employment or in connection with any employment] will be reported immediately by telephone or telegraph to the nearest District Office of the Division of Occupational Safety and Health.

Definition of Immediately: as soon as practically possible but not longer than 8 hours after the employer knows or with diligent inquiry would have known of the death or serious injury or illness.

Location of Cal/OSHA Forms 300 and 301:

As a general rule, the Cal/OSHA Forms 300 and 301 will be maintained in our PCI portal and available to managers to download at their location.

Information to Be Reported:

When reporting a fatality, in-patient hospitalization, amputation or loss of an eye to Cal/OSHA, the following information must be reported:

a. Establishment name
b. Location of the work-related incident
c. Time of the work-related incident
d. Type of reportable event (i.e., fatality, in-patient hospitalization, amputation or loss of an eye)
e. Number of employees who suffered the event
f. Names of the employees who suffered the event
g. Contact person and his or her phone number
h. Brief description of the work-related incident

Note: An event does not have to be reported if it:

a. Resulted from a motor vehicle accident on a public street or highway, except in a construction work zone; employers must report the event if it happened in a construction work zone.

b. Occurred on a commercial or public transportation system (airplane, subway, bus, ferry, streetcar, light rail, train).

c. Occurred more than 30 days after the work-related incident in the case of a fatality or more than 24 hours after the work-related incident in the case of an in-patient hospitalization, amputation, or loss of an eye.

Note: We must report an in-patient hospitalization due to a heart attack, if the heart attack resulted from a work-related incident.

Postings

On every job site there will be a prominently displayed bulletin board or area for postings. Every employee must be aware of this policy. Certain postings are required as a matter of law in all cases and other postings are required depending on circumstances and types of work being done.

In all cases, the below must be posted on the job site to meet California Labor Code and Title 8, California Code of Regulations, requirements.

a. Our Code of Safe Practices.
b. Safety and Health Protection on the Job.
c. During the period from 1 February through to April 30, Cal/OSHA Form 300A, Annual *Summary of Work-Related Injuries and Illnesses*, must be posted for work-related injuries and illnesses which have occurred during the previous year.
d. Emergency Phone Numbers.
e. Industrial Welfare Commission Wage Orders.
f. Payday Notice.
g. Notice to Employees – Injuries Caused by Work.
h. Notice of Workers' Compensation Carrier and Coverage.
   Note: Obtained from Insurance Carrier
i. Whistleblower Protections.
j. If employees are working with hazardous/toxic substances, the following must be posted:
   Access to Medical Exposure Records – English.
   Access to Medical Exposure Records – Spanish.
k. If employees are using industrial trucks, the following must be posted:
   Operating Rules for Industrial Trucks – English
   Operating Rules for Industrial Trucks – Spanish

Additional postings required by other California agencies may be obtained at the following link: Additional Postings

If appropriate, the following must be posted:

a. Cal/OSHA citations.
b. Notice of informal hearing conference.
c. Names and location of assigned first aid providers.
d. Air or wipe sampling results.
e. Emergency action plan.

Digital Postings

We will only use digital postings to meet the continuous posting requirement when the following criteria is met:

a. Employees strictly work remotely.
b. Employees typically receive information from our company via electronic means.
c. All employees always have access to digital postings.

If the above requirements cannot be met, a hard-copy posting will be required. All digital postings will be identical in content and as effective as a hard-copy posting.

Access to Employee Medical Records & Exposure Records

All employee exposure records, and medical records are under the control of our Third Party Administrator.

Exposure Records must be retained for 30 years.

Medical Records must be retained for the duration of employment plus 30 years.

An employee's medical record means "a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician".

This would include:

a. medical and employment questionnaires or histories (including job description and occupational exposures),
b. the results of medical examinations (pre-employment, pre-assignment, periodic, or episodic) and laboratory tests (including chest and other X-ray examinations taken for the purpose of establishing a baseline or detecting occupational illnesses and all biological monitoring not defined as an "employee exposure record".
c. medical opinions, diagnoses, progress notes, and recommendations.
d. First aid records.
e. descriptions of treatments and prescriptions.
f. employee medical complaints.

Note: An employee's medical record does not include:

a. physical specimens (e.g., blood or urine samples) which are routinely discarded as a part of normal medical practice, or

b. records concerning health insurance claims if maintained separately from the employer's medical program and its records, and not accessible to the employer by employee name or other direct personal identifier (e.g., social security number, payroll number, etc.).

c. records created solely in preparation for litigation which are privileged from discovery under the applicable rules of procedure or evidence.

d. records concerning voluntary employee assistance programs (alcohol, drug abuse, or personal counseling programs) if maintained separately from the employer's medical program and its records.

An employee's employee exposure record means a record containing any of the following kinds of information:

a. environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained.
b. biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs.

c. safety data sheets indicating that the material may pose a hazard to human health.
d. in the absence of the above, a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.
e. Objective Data for Exemption from Requirement for Initial Monitoring.

Employee Information

Upon first entering into employment, and at least annually thereafter, each employee will be informed of the following:

a. The existence, location, and availability of any records covered by *8 CCR Sec. 3204*.
b. The person responsible for maintaining and providing access to records.
c. the employee's rights of access to his/her records.

Informational materials concerning access to medical records received from or provided by the Assistant Secretary of Labor for Occupational Safety and Health will be distributed to all current employees.

Access to Records

Employees or their designated representatives will have access to their medical or exposure records within 15 working days of their request or, if this is not possible, Zoe Robinette will provide, within 15 working days, the reason for the delay and provide a best estimate of when the records will be available.

Copies of employee medical or exposure records will be provided in a reasonable time, place, and manner and **at no cost to the employee**.

Upon request, Zoe Robinette will provide access to representatives of the Assistant Secretary of Labor for Occupational Safety and Health employee exposure and medical records and to analyses using exposure or medical records.

Analysis Using Medical or Exposure Records

"Analysis using exposure or medical records" means any compilation of data or any statistical study based at least in part on information collected from individual employee exposure or medical records or information collected from health insurance claims records, provided that either the analysis has been reported to the employer, or no further work is currently being done by the person responsible for preparing the analysis.

Before access is granted to an analysis using medical or exposure records, all personal identifiers must be removed that could reasonably directly identify the employee. Identifiers would include name, SSN, address, etc. Identifiers that could indirectly identify the employee will also be removed. These would include date of hire, sex, job title, etc.

Confidentiality

Nothing in the OSHA standards is intended to affect existing legal and ethical obligations concerning the maintenance and confidentiality of employee medical information, the duty to disclose information to a patient/employee or any other aspect of the medical care relationship or affect existing legal obligations concerning the protection of trade secret information.

Transfer of Records

Should we cease to do business, the successor employer will receive and retain all the above medical and exposure records.

Should we cease to do business and there is no successor employer to receive and retain the above medical and exposure records, they will be transmitted to the Director of the National Institute of Occupational Safety and Health.

At the expiration of the retention period for the above medical records, we will notify the Director at least 3 months prior to the disposal of such records and will transmit those records to the Director if he requests them within that period.

Employee Write-Ups & Safety Enforcement

It is expected that all employees will abide by our safety rules and guidelines not only to protect themselves, but also to protect their fellow workers from harm. Should a safety violation occur, the following steps will be taken by the employee's immediate supervisor:

Note: Examples of what constitutes a safety violation includes, but is not limited to, failure to follow verbal or written safety procedures/guidelines/rules, failure to wear selected PPE, horse play, abuse of equipment, etc.

Minor Safety Violations: Violations which would **not** reasonably be expected to result in serious injury.

a. The hazardous situation will be corrected.
b. The employee will be informed of the correct procedures to follow, and the supervisor will ensure that these procedures are understood.
c. The supervisor will make a written report of the occurrence using our Enforcement Documentation Form and inform the employee that this documentation will be forwarded to Zoe Robinette, our Safety Director, for a retention period of one year.
d. A repeat occurrence of the same minor safety violation is considered substantially more serious than the first.

Major Safety Violations: Violations which would reasonably be expected to result in serious injury or death.

a. The hazardous situation will be corrected.
b. The employee will be informed of the correct procedures to follow and will impress upon the individual the severity of the violation and the likely consequences should this type of violation be repeated. The supervisor will ensure that the individual understands the correct procedures and will be cautioned that a reoccurrence could result in disciplinary action up to and including discharge.
c. The supervisor will make a written report of the occurrence using our Enforcement Documentation Form and inform the employee that this documentation will be forwarded to Zoe Robinette for a retention period of one year.

Willful Major Safety Violations: Intentional violation of a safety rule which would reasonably be expected to result in serious injury to the employee or a fellow worker.

a. The hazardous situation will be corrected.
b. The employee will be removed from the job site, the event will be documented and forwarded to Zoe Robinette, and the employee will be discharged.

Employees are to understand that the primary purpose of documenting safety violations is to ensure that the important business of employee safety is taken seriously and that the potential for injury is reduced to the lowest possible level.

As part of our supervisory commitment to safety, management personnel will conduct frequent and random physical job site inspections using our inspection checklists. Violations showing an overall lack of commitment to company safety goals will result in enforcement actions listed below.

Schedule of Enforcement Actions
Violations Occurring within a 1 Year Period
Minor Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	1 Day Off
2nd	Written Notice	2nd	3 Days Off
3rd	1 Day Off	3rd	Dismissal
4th	2 Days Off		
5th	3 Days Off		
6th	Dismissal		

Major Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	4 Days Off
2nd	2 Days Off	2nd	Dismissal
3rd	4 Days Off		
4th	Dismissal		

Parking Concepts, Inc Section II
Site/Job Specific Policies & Procedures

Bees, Insects, and Animal Hazards

One of the least predictable hazards when working outdoors in general, and specifically when working in or around trees, is the threat from local wildlife. If an insect's nest is accidentally disturbed or an animal feels threatened by an approaching person, it is likely to do anything it can to protect itself, often causing injury or even death to an unsuspecting worker.

Precautions must be taken to reduce the probability of a negative interaction with bees, insects, or other animals while working outdoors.

Pre-Work Inspection

Just as tools must be inspected for defects before starting work, the outdoor work area must be inspected as well. This includes trees, shrubs, and even structures must be inspected for evidence of bees and other wildlife habitation that may present hazards.

Signs of wildlife to look for:

a. Nests
    1. Bees, wasps, and yellow jackets make papery nests that may hang in trees or be located on the ground.
    2. Squirrels, crows, ravens, and hawks often make large nests of twigs and leaves in the forks or branches of trees.
    3. Birds may make twiggy nests on the boughs of trees, hanging nests, or nests in the ground.
    4. Racoons, squirrels, some birds, and other animals may make nests in holes in tree trunks.
    5. Many species of spiders, moths, & butterflies make webs or cocoons in trees.
    6. Fire ants build mound-shaped nests.
b. Insects or animals-The presence of several bees, for example, may indicate a nearby nest which you must be careful not to disturb.
c. Tracks or trails-Animal tracks or trails may be seen in the mud, dirt, or grass around a tree.
d. Feeding-Look for leaves that have been chewed, broken pinecones or nuts, and holes in tree trunks or the ground made by animals looking for grubs.
e. Scat or droppings-The shape, size, and material in scat may help identify which animal left it in the area.

If any wildlife is encountered during a pre-work inspection, notify Zoe Robinette or the competent person on site immediately. The hazard must be identified and evaluated. Appropriate personal protective equipment and/or additional training may be required.

General Precautions

The following basic precautions should be taken when working outdoors to prevent an unsafe encounter with biting or stinging insects and wild or stray animals:

a. Wear gloves, long pants, socks, a long-sleeved shirt, and boots that are at least 10 inches high.
b. Watch where you place your hands and feet when removing debris.
c. Avoid perfumed soaps, shampoos, and deodorant. Use insect repellent that contains DEET or Picaridin.
d. Avoid handling or mowing over live or dead animals.

Wildlife Encounters

Despite conducting a thorough pre-work inspection and following the general precautions listed above, you may come across wildlife during your work. The hazards the wildlife presents, and your reaction will vary depending on the animal or insect you encounter.

Bees, Wasps, or Yellow Jackets:

a. Stay calm and still if a stinging insect is flying around you. Do not swat at it.
b. If you accidentally disturb a nest or are stung by several bees, wasps, or yellow jackets, run away as fast as you can. Get indoors as soon as possible.
c. Do not swat at attacking bees.
d. Do not jump into water. Bees will wait above the surface of the water and sting when you come up for air.
e. If bees are attacking someone who cannot run away, cover him or her with anything you have available, such as a jacket or tarp, and run to call for help.
f. Call 911 immediately if a victim exhibits a severe allergic reaction to a sting, such as chest pain, nausea, sweating, loss of breath, serious swelling, or slurred speech. Workers with a history of allergic reaction to stings should carry an EpiPen (epinephrine auto-injector) or wear a medical id bracelet stating their allergy.
g. Treat minor stings by removing the stinger and applying ice packs to reduce pain and swelling for the first 24 hours. After 24 hours, heat should be applied.

Mosquitos:

a. Follow the general precautions listed above.
b. Be extra vigilant at dusk and dawn when mosquitoes are most active.
c. Get rid of sources of standing water (used tires, buckets, etc.) to reduce or eliminate mosquito breeding areas.
d. Contact your doctor if you have symptoms of West Nile virus, which is transmitted by the bite of an infected mosquito. Mild symptoms include fever, headache, and body aches, occasionally with a skin rash on the trunk of the body and swollen lymph glands. Symptoms of severe infection include headache, high fever, neck stiffness, stupor, disorientation, coma, tremors, convulsions, muscle weakness, and paralysis.
e. Contact your doctor if you have symptoms of Zika virus, which is transmitted by the bite of an infected mosquito. Symptoms include fever, rash, joint pain, pink or red eyes, muscle pain, and headache.

Ticks:

a. Follow the general precautions listed above.
b. Wear light-colored clothes so ticks can be seen more easily.
c. Wear a hat.
d. Use tick repellants, but not on your face.
e. Shower after work.

f. Examine your body for ticks, especially the hair, underarms, and groin. Remove any attached ticks promptly and carefully with fine-tipped tweezers by gripping the tick. Do not use petroleum jelly, a hot match, or nail polish to remove the tick.
g. Wash and dry your work clothes at high temperature.
h. Contact your doctor if you have symptoms of Rocky Mountain spotted fever or Lyme disease, which are transmitted by ticks. Both Rocky Mountain spotted fever and Lyme diseases may produce a distinctive rash. Other signs and symptoms may be non-specific and similar to flu-like symptoms such as fever, lymph node swelling, neck stiffness, generalized fatigue, headaches, migrating joint aches, or muscle aches. Tularemia can also be transmitted by ticks (see *Tularemia*, below).

Fire Ants:

a. Follow the general precautions listed above.
b. Be aware of where you're walking - don't stand on ant nests or areas where the ants are foraging.
c. If attacked, leave the area immediately while brushing off ants with the use of a gloved hand or by using a cloth.
d. Seek immediate medical attention if you have nausea, chest pains, feel short of breath, or have swelling.
e. Consult your pharmacist for treatment of minor bites and irritation. The sting of a fire ant develops into a pustule (small, firm blister-like sore) in 24-48 hours. These pustules can become sites of secondary infection.

Black Widow Spiders:

a. Follow the general precautions listed above.
b. Be aware that black widows may live in woodpiles, rubble piles, hollow stumps, rodent burrows, privies, sheds, basements, crawlspaces, garages, and under rocks.
c. If bitten, capture the spider if possible, for identification purposes.
d. Know the symptoms of a black widow bite:
    1. Bites may be painful or go unnoticed. The skin may display one or two bite marks with local swelling.
    2. Pain usually progresses from the bite site and eventually to the abdomen and back. Severe cramping or rigidity may occur in the abdominal muscles.
    3. Severe symptoms may include nausea, profuse perspiration, tremors, labored breathing, restlessness, increased blood pressure, and fever.
    4. The pain from the bite will usually persist for the first 8-12 hours. Symptoms may continue for several days.
e. Seek medical attention immediately if you have severe symptoms of a black widow bite.
f. Clean the bite area with soap and water. Apply ice to the bite area to slow absorption of the venom. Elevate and immobilize the extremity.

Brown Recluse Spiders:

a. Follow the general precautions listed above.
b. Be aware that the brown recluse spider builds small retreat webs behind objects of any type.
c. If bitten, capture the spider if possible, for identification purposes.
d. Know the symptoms of a brown recluse spider bite:
    1. The severity of the bite may vary. Symptoms may vary from none to very severe.
    2. The bite generally becomes reddened within several hours.
    3. There is often a systemic reaction within 24-36 hours characterized by restlessness, fever, chills, nausea, weakness, and joint pain.
    4. Tissue at the site of the bite and the surrounding area dies and eventually sheds.
e. Seek medical attention immediately if you have severe symptoms of a brown recluse bite.
f. Clean the bite area with soap and water. Apply ice to the bite area to slow absorption of the venom. Elevate and immobilize the extremity.

Squirrels, Birds, Bats:

a. Be aware of these animals while working in trees or shrubbery. They may startle you, causing you to fall, trip, or otherwise injure yourself.

Rodents, Racoons, and Wild or Stray Animals:

a. Avoid contact with wild or stray animals. Call Animal Control if you notice an animal that is acting oddly or aggressively.
b. Avoid contact with rats or rat-contaminated buildings. If you can't avoid contact, wear protective gloves and wash your hands regularly.
c. Properly dispose of dead animals as soon as possible. Wear the appropriate PPE and make sure to wash your hands with soap and water.
d. Get medical attention immediately if bitten or scratched. Mammals may carry a number of diseases:
    1. *Streptobacillary Rat-bite Fever* is transmitted by the bite or scratch of an infected rodent. Symptoms generally occur 3-10 days after exposure but may take as long as 3 weeks to appear. Symptoms include fever, vomiting, headache, muscle pain, joint pain, and a rash of flat, reddened areas with small bumps on the hands and feet.
    2. *Rabies* is transmitted through the bite of a rabid animals such as raccoons, skunks, bats, and foxes. Flu-like symptoms, including general weakness or discomfort, fever, or headache, are the first symptoms of rabies. The site of the bite may feel uncomfortable, prickly, or itchy. Symptoms rapidly progress to cerebral dysfunction, anxiety, confusion, and agitation. Next, the patient may experience delirium, abnormal behavior, hallucinations, and insomnia. Once clinical signs of rabies appear, the disease is nearly always fatal.

3. *Tularemia* is a highly infectious disease caused by the bacterium *Francisella tularensis*. It can enter the human body through the skin, eyes, mouth, or lungs, but it cannot be transmitted from person to person. Although tularemia can be life-threatening, most infections can be successfully treated with antibiotics. Symptoms of infection vary depending on the route of entry, but all forms are accompanied by flu-like symptoms, such as fever, chills, headaches, body aches, and weakness, that usually occur three to five days after exposure to the bacteria.
    i. The bites of ticks or deer flies infected with tularemia may cause swollen lymph glands with or without a skin ulcer.
    ii. Handling dead or live animals infected with tularemia may also result in swollen lymph glands and may cause irritation and inflammation of the eyes.
    iii. Breathing dusts or aerosols containing *Francisella tularensis* may cause lung inflammation or infection (pneumonic tularemia). Pneumonic tularemia can also occur when other forms of tularemia are left untreated and the bacteria spread through the bloodstream to the lungs. This is the most serious form of tularemia. Symptoms include cough, chest pain, and difficulty breathing.
    iv. Eating or drinking food or water contaminated with the bacteria may cause patients to have a sore throat, mouth ulcers, tonsillitis, and swelling of lymph glands in the neck.

<u>Snakes</u>:

a. Follow the general precautions listed above.
b. Look for snakes sunning on fallen trees, limbs, or other debris before beginning work.
c. Watch where you place your hands and feet when removing debris. If possible, don't place your fingers under debris you are moving. Remember to wear heavy gloves.
d. Stay clear if you see a snake; step back and allow it to proceed. Keep in mind that a snake's striking distance is about 1/2 the total length of the snake.
e. Take the following steps if bitten:
    1. Note the shape of the snake's head and its color to help with treatment.
    2. Keep bite victims still and calm to slow the spread of venom in case the snake is poisonous.
    3. Do not cut the wound or attempt to suck out the venom.
    4. Apply first aid: lay the person down so that the bite is below the level of the heart, and cover the bite with a clean, dry dressing.
    5. Seek medical attention as soon as possible.

<u>Cougars (a.k.a. Mountain Lions, Pumas, Panthers):</u>

a. Stay in a group. Do not wander off by yourself.
b. Be noisy. Talk, sing, or play music. Avoid surprising a cougar.
c. Leave the area immediately if you find cougar kittens; cougars are protective of their young.

d. Do not run away if you encounter a cougar. Do not turn your back or play dead.
e. Maintain eye contact with the cougar. Yell, wave your arms, make noise, and try to look as big as you can.
f. If attacked, fight back, aiming for the eyes and face. Try to stay on your feet and protect your neck.
g. Carry pepper spray if you a working in areas cougars may inhabit; pepper spray may stop an attack.

Bears:

a. Stay in a group. Do not wander off by yourself.
b. Be noisy. Talk, sing, or play music. Avoid surprising a bear.
c. Leave the area immediately if you find bear cubs; bears are protective of their young.
d. Do not leave food lying around and make sure to clean up garbage.
e. Carry pepper spray in areas bears may inhabit.
f. If you encounter a bear, identify whether it is a black bear or a grizzly bear. Neither size nor color are a foolproof way to distinguish the bears, although black bears tend to be smaller and darker, and grizzlies tend to be larger and lighter. In the eastern part of the U.S., you will only encounter black bears. Both black bears and grizzly bears inhabit the western U.S.
    1. Black bears have a straight face profile, taller ears, and 1½-inch long, dark-colored claws. They do not have a shoulder hump.
    2. Grizzly bears have a dished face profile, short, round ears, and 2- to 4-inch long, light-colored claws. They have a pronounced shoulder hump.
g. If the bear is more than 350 ft. away, but the bear has not noticed you, retreat slowly and quietly.
h. If the bear is more than 350 ft. away and it has noticed you, speak calmly and firmly as you back slowly away while waving your arms. The bear may flee once it has identified you as human. Do not run away from a bear!
i. If a bear shows signs of aggression, do not run away. Retreat slowly and speak calmly and firmly. Do not make eye contact with the bear.
j. If a bear charges, hold your ground. If the bear comes within 25 ft., use the pepper spray, aiming for the eyes and nose.
k. If the bear attacks, your response should depend on the type of bear you're dealing with:
    1. For grizzly bears, curl up in a ball on your side and stay quiet. Do not get up until the bear has left the area.
    2. For black bears, fight back as hard as you can, with anything you can use as a weapon (tools, rocks, sticks, knives, etc.)

Flammable and combustible liquids

Only approved containers and portable tanks will be used for storage and handling of flammable and combustible liquids. Approved safety cans or Department of Transportation approved containers will be used for handling and use of flammable liquids in quantities of 5 gallons or less.

Note: The above does not apply to flammable liquid materials which are highly viscid (extremely hard to pour) which may be used and handled in their original shipping containers.

Note: For quantities of one gallon or less, the original container may be used for storage, use and handling.

Flammable or combustible liquids may not be stored in areas used for exits, stairways, or normally used for the safe passage of people.

Inside a facility, no more than 25 gallons of flammable or combustible liquids may be stored in a room outside of an approved storage cabinet.

Gasoline

General Information

Because most persons use or indirectly handle gasoline on a regular basis - from filling up automobiles to lawn mowers - the hazards presented by this product may have become obscure. Just because you are familiar with gasoline, never lose sight of the lethal hazards that it may contain.

Gasoline is a flammable liquid which means it has a flash point of less than 100ºF. The actual flash point - lowest temperature at which a liquid gives off enough vapor to form a flammable mixture with air - of gasoline is - 45ºF. The autoignition temperature - the temperature at which, with sufficient oxygen, gasoline will ignite on its own & burn - is 536ºF.

Gasoline has a specific gravity - the weight of the gasoline compared to the weight of an equal volume of water - of 0.73. Further, gasoline has a negligible solubility in water. Basically, what the above means is that if water is used to extinguish a gasoline fire, it will only spread it because the gasoline will float on the water and continue to give off a vapor and form a flammable mixture with air. Gasoline fires must be fought with an extinguisher that is rated for Class B Fires such as carbon dioxide, dry chemical, or foam. It should be noted that water spray may be used to cool containers that may be exposed to the heat of the fire to prevent an explosion.

Conditions to avoid heat, flame, & sources of ignition. Materials to avoid strong oxidizers.

Health hazard information: routes of entry: inhalation, skin, ingestion.

Signs & symptoms of overexposure: headache, nausea, drowsiness, breathlessness, fatigue, convulsions, loss of conscience, dermatitis.

If there is a spill, notify emergency response personnel, evacuate area, remove ignition sources, build a dike to contain flow, do not flush to sewer or open water. Pick up with inert absorbent and place in closed container for disposal.

Gasoline is a carcinogen - a cancer causing agent.

General rules: Post “No Smoking” signs around gasoline storage and ensure that it is enforced. Use only approved plastic or metal containers for portable gasoline carriers. They must not contain more than 5 gallons.

Double check with local ordinances for storage requirements.

Company Vehicles

Only authorized employees may operate, in the course of their work, any company-owned motor vehicle.

Prior to authorization, the employee must possess a valid and current license to operate the vehicle. The site manager and/or authorized representative, will ensure that the employee has demonstrated his/her ability to operate the motor vehicle in a safe and competent manner.

Under no circumstances may any motor vehicle be operated under the influence of alcohol, illegal drugs, or prescription or over-the-counter drugs medications that may impair their driving skills.

When driving over the road vehicles, employees will ensure that the vehicle registration and proof of insurance is within the vehicle. In the event of an accident, Zoe Robinette will be notified **immediately** after all potential injuries are addressed and a police report is filled out.

Employees must report all traffic violations to Zoe Robinette and they are responsible for paying all penalties imposed by law.

Loads in vans and trucks or carts will be properly secured [strapped or blocked] to preclude any shift or movement and care will be taken to not exceed the vehicles weight limits.

All company motor vehicles will be maintained in safe operating condition and in accordance with the manufacturer's recommended maintenance schedule. A logbook will be maintained for each vehicle and receipts will be kept for all maintenance and repairs performed.

Before use, a walk around inspection will be performed by the operator checking tires (tread depth and pressure), glass (chips and cracks), horn and lights, and general vehicle condition. **No vehicle will be operated that is not in safe mechanical condition.**

It is expected that the below safe vehicle operation/driving procedures will be followed at all times:

a. Seat belts will be worn by all occupants at all times while the vehicle is in motion
b. Safe distance (one vehicle length per 10 MPH) will be maintained
c. Posted speed limits will not be exceeded
d. During fuel stops, all fluids will be checked, and the windows, headlights and taillights will be cleaned
e. Constant attention will be maintained by always being aware of road conditions and surrounding vehicles

   Note: Unnecessary distractions will not be permitted such as using hands to dial or receive cell phone calls or changing radio stations while the vehicle is in motion.

f. Before backing up any vehicle, check behind and blow horn for the safety of others.

Compressed Air

California Code of Regulations, Title 8, § 3301. Use of Compressed Air or Gases.

Prior to using compressed air, employees will receive training in:

a. Safe use of compressed air.
b. Pneumatic power tools.
c. Inspection of compressed gas cylinders

What follows are the guidelines for safe use of compressed air and gases:

a. Compressed air or other compressed gases in excess of 10 lbs. per square inch gauge will not be used to blow dirt, chips, or dust from clothing while it is being worn.
b. Compressed air or gases will not be used to empty containers of liquids where the pressure can exceed the safe working pressure of the container.
c. In order to protect the operator or other workers from the possibility of eye or body injury, the use of compressed air will be controlled and the proper personal protective equipment (PPE) or safeguards will be used.
d. Abrasive blast cleaning nozzles will be equipped with an operating valve which must be held open manually. A support will be provided on which the nozzle may be mounted when it is not in use.
e. Compressed gases will not be used to elevate or otherwise transfer any substance from one container to another unless the containers are designed to withstand, with a safety factor of at least four, the maximum possible pressure that may be applied.

Pressure testing of any object will be in accordance with Section 560(c) and (d) of the Unfired Pressure Vessel Safety Orders.

Disposable Respirators

Appendix D to Section 5144

Cal/OSHA requires that employees who voluntarily use disposable respirators in situations where respiratory protection is not specifically required by OSHA standard (in atmospheres where exposures are below the permissible exposure limit) essentially for personal comfort or additional, though not required, respiratory protection be informed of Appendix D to Section 5144, printed below.

All disposable respirators, such as Moldex, 3M, Wilson, North Safety, etc. must be marked with the manufacturer's name, the part number, the protection provided by the filter, and "NIOSH".

Disposable filters are particulate respirators. They are also known as "air- purifying respirators" because they protect by filtering particles out of the air you breathe.

Though disposable filters cannot be fit-tested in the traditional sense, they must be fit-tested in accordance with the manufacturer's instructions. Under no circumstances may any respirator other than the above disposable respirators be used without compliance with a respiratory protection program.

Appendix D to Section 5144: (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

a. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
b. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
c. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designated to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors or very small solid particles of fumes or smoke.
d. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Electrical Work - Workplace Safety

Electrical Requirements for Construction Work
Ground-Fault Circuit Protection-Construction Site
Low-Voltage Electrical Safety Orders
NFPA 70E Standard for Electrical Safety in the Workplace

No electrical work will be performed on electric distribution circuits or equipment, except by a qualified person or by a person trained to perform electrical work and to maintain electrical equipment under the direct supervision of a qualified person. Disconnecting devices will be locked out and suitably tagged by the persons who perform such work, except that in cases where locking out is not possible, such devices will be opened and suitably tagged by such persons. Locks or tags will be removed only by the persons who installed them or, if such persons are unavailable, by persons authorized by the operator or his agent.

Only qualified or trained personnel may perform electrical work.

All electrical work will be done according to the latest adopted National Electrical Code as well as established local codes.

Only qualified persons may work on electric circuit parts or equipment that have not been de-energized. These persons must be made familiar with the use of special precautionary techniques, PPE, insulating & shielding materials and insulated tools.

When dealing with safety related work practices to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, a Qualified Person is defined as one who: "is permitted to work on or near exposed energized parts" and who, at a minimum, has been trained in and is familiar with:

a. the skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment, and
b. the skills and techniques necessary to determine the nominal voltage of exposed live parts, and
c. the clearance distances specified in §1910.333(c) and the corresponding voltages to which the qualified person will be exposed.

Approach Distances for Qualified Employees - AC	
Voltage Range (phase to phase)	Minimum Approach Distance
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm).
Over 750V, not over 2kV	1 ft. 6 in. (46 cm).
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm).
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm).
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm).
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm).
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm).

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

For voltages to ground 50kV or below:	10 feet
For voltages to ground over 50kV:	10 feet plus 4 inches for every 10kV over 50kV.

When an unqualified person is working on the ground in the vicinity of overhead lines, the person may not bring any conductive object closer to unguarded, energized overhead lines than the distances given above.

Electrical Safety Measures

Daily, prior to use, all electrical equipment -- including extension cords -- will be inspected and defective items will be tagged out of service and not used.

a. With the exception of double insulated tools (with UL approval), all electrical tools and equipment will be grounded.
b. Tools will not be hoisted by their flexible electrical cords.
c. Except in an emergency, load rated switches and circuit breakers will be used for the opening and closing of circuits under load conditions as opposed to fuses and splice connections.
d. While working on electrical equipment, unauthorized persons will be kept clear by barriers or other means of guarding.
e. Temporary wiring and extension cords will be kept off of walking working surfaces and vehicle traffic areas or covered to prevent tripping and vehicle damage.
    1. Electrical cords will not be suspended with staples, hung from nails, or suspended by wire.
    2. Worn or frayed electric cords or cables will not be used.
f. Hands will be dry when working on electrical equipment including plugging in extension cords.
g. Areas in which electrical work is to be done must be adequately illuminated and temporary lighting must:
    1. have guards in place.
    2. not be suspended by its cords unless specifically designed for such installation.
h. A competent person, before work commences, will inform all employees in the work area of both exposed and concealed electrical hazards. If appropriate, warning tags will be used to prevent accidental contact with electrical energy.
i. When working around any electrical power circuit, employees will:
    1. Protect themselves by de-energizing the circuit and grounding it or by establishing insulation between themselves and the current.
    2. Ensure that any conductive materials and equipment that are in contact with any part of their body will be handled in a manner that will preclude contact with exposed energized conductors or circuit parts.
    3. Use portable ladders that have non-conductive siderails.
    4. Remove or insulate conductive articles of jewelry and clothing that might contact exposed energized parts.

j. All 15, 20, or 30-amp receptacle outlets that are not part of the permanent wiring of the building or structure and that are used by personnel will have ground-fault circuit interrupter protection for personnel. GFCI pigtails may be used to meet this requirement if properly sized. Remember, extension cords are considered temporary wiring.
    1. Ground fault circuit interrupters will be tested before use.
k. Only qualified persons may perform testing work on electric circuits or equipment.
l. Sufficient access and working space must be maintained about all electric equipment to permit ready and safe operation and maintenance. This space must be kept clear, i.e., it cannot be used for storage.
m. If any work is to take place under overhead lines, the lines must be de-energized and grounded or other protective measures taken such as physically preventing approach such as using a barrier.
n. Portable ladders must have non-conductive side rails.
o. Conductive items of jewelry or clothing must not be worn around electricity unless rendered non-conductive by covering, wrapping, or other insulating means.

Extension Cords

29 CFR 1926.405 - Wiring methods, components, and equipment for general use
29 CFR 1926.416 - General requirements

Extension cords will not replace permanent wiring and the following safety precautions will be adhered to:

a. Inspect the cord for cracks and cuts.
b. Cord must have a three-prong plug for grounding.
c. Use the shortest continuous length of cord possible. Cords may not be spliced together.
d. Make certain the cord does not lay in water.
e. Ensure cord is properly rated for the job.
f. Secure and route cords out of the traffic flow to prevent tripping.
g. Defective cords will be tagged and removed from service.
h. Most importantly, an extension cord used on a job site MUST be used with a ground fault circuit interrupter (GFCI).

Ground Fault Circuit Interrupters

§2405.4. Ground-Fault Circuit Protection-Construction Site.

Our company uses ground fault circuit interrupters.

A ground fault circuit interrupter (GFCI) provides protection for all 120-volt, 15-, 20-, and 30-ampere receptacle outlets that are not a part of the permanent wiring by detecting lost current resulting from a short, overheating, and/or ground fault. It should be noted that an extension cord into which electrical devices are plugged are not part of the permanent wiring; therefore, GFCI's are required.

A GFCI will "trip" when the amount of current amperes going to an electrical device in the hot conductor and the amount of current returning from an electrical device differs by approximately 5 milliamps. The GFCI can interrupt the current within as little as 1/40th of a second.

The current that is missing is being lost through a ground fault, whether it is in the actual grounding, a short in the equipment or electricity going through the employee to the ground.

A GFCI will not protect an employee who comes in contact with two hot wires or a hot wire and a neutral wire. A GFCI will provide protection against fires, overheating, damage to insulation, and, the most common form of electrical shock hazard -- the ground fault. GFCI’s must be tested before use.

Ladders

§1629. Stairways and Ladders.
§1675. General. (Ladders)
§1676. Job-Made Ladders.
§3278. Portable Wood Ladders.
§3279. Portable Metal Ladders.
§3287. Ladders.

All employees using ladders are required by Cal/OSHA standard to receive training and understand proper procedures for ladder use before using a ladder in a work situation.

All ladders will be inspected periodically, and defective ladders will be tagged and placed out of service.

American National Standards Institute (ANSI) and NIOSH approval labels should never be covered with paint or tape. Having ladders that are constructed to standard will prevent collapse and resultant falls.

Specific operational procedures for ladders directly relating to the elimination of fall hazards are listed below:

a. A stairway or a ladder will be provided at all personnel points of access where there is a break in elevation of 19 inches or more.
b. Ladders will never be overloaded.
c. Ladder rungs, cleats, and steps must be parallel, level, and uniformly spaced when a ladder is in position for use.
d. Ladders will not be tied or fastened together unless they are so designed.
e. Portable ladders used for gaining access to an upper level will extend at least 3 feet above the upper landing surface or the ladder will be secured at its top.
f. Ladders must be free of oil, grease, or other slipping hazards.
g. Ladders must be used for the purpose for which they were designed.
h. Non-self-supporting ladders will be used at such an angle so that the horizontal distance from the top support to the foot of the ladder is approximately ¼ of the working length of the ladder.
i. Ladders will only be used on stable and level surfaces unless secured to prevent displacement.
j. Ladders will not be used on slippery surfaces unless secured or provided with slip-resistant feet to prevent accidental displacement.
k. Ladders placed in any location where they can be displaced by job site activities or traffic will be secured to prevent accidental displacement, or a barricade will be used to keep the activities or traffic away from the ladder.
l. The area around the top and bottom of the ladder will be kept clear.
m. Ladders will not be moved, shifted, or extended while occupied.
n. The top step of a stepladder will not be used as a step.
o. Portable ladders with structural defects will be immediately marked in a manner that readily identifies them as defective and removed from service until repaired.
p. When ascending or descending a ladder, one must face the ladder.
q. Employees must use at least one hand to grasp the ladder when progressing up and/or down the ladder.
r. Employees are not to carry any object or load that could cause loss of balance and a resultant fall.

Fixed ladders where the length of climb is less than 24 feet, but the top of the ladder is greater than 24 feet above the lower level must have cages, wells, ladder safety devices, or self-retracting lifelines.

Fixed ladders where the length of climb equals or exceeds 24 feet will have at least one of the following:

a. Ladder safety devices.
b. Self-retracting lifelines and rest platforms not exceeding 150 feet.
c. A cage or well, and multiple ladder sections not exceeding 50 feet in length. At the maximum interval of 50 feet, ladder sections will be offset on landing platforms.

Lighting

A competent person will ensure that all work areas have adequate lighting. Adequate lighting serves a two-fold purpose – allowing tasks to be more readily performed as well as providing the additional safety factor of being seen by persons not involved with the work – especially vehicular traffic.

If generators are used for auxiliary lighting, they will be operated and maintained by authorized persons who are competent by training or experience.

Machine Guarding

Most injuries that occur when operating a machine happen at the point of operation – the point on a machine where the actual work (cutting, bending, and spinning) occurs. This is also the point where guards can protect fingers and hands exposed to that danger. Machine guarding also protects employees from other dangers such as flying pieces of metal, sparks, gears, belts, and rotating parts.

The most common types of machines on job sites are power tools which often have guards to prevent injury.

Accident prevention in this area is a function of machine design – engineering controls – and operator training. Types of machine guarding are almost as numerous as types of machines – the most common being a physical barrier to prevent accidental insertion of body parts. Guards are vital for safety reasons and machine guards designed into a machine should never be altered or removed. The speed and tremendous forces involved in modern machines are such that severe injury or even death could occur without warning and without even slowing the machine down.

Training and proper work methods go a long way toward reducing machine accidents. Like all safeguards, there is generally a way to bypass safety features that are engineered into machines. This is sometimes done to increase speed or just to make one's job easier. This could result in a tragic, avoidable accident. The few seconds saved could cause a lifetime of grief. **Do not bypass safety systems.**

Operate all machines according to the instructor's manual and follow all safety procedures.

Material Storage

CCR, Title 8, §1548. Bins, Bunkers and Hoppers
CCR, Title 8, §1549. Piling Material

General Requirement for Storage

All materials stored in tiers must be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling or collapse.

Maximum safe load limits of floors within buildings and structures, in pounds per square foot, must be conspicuously posted in all storage areas, except for floor or slab on grade. Maximum safe loads must not be exceeded.

Aisles and passageways must be kept clear to provide for the free and safe movement of material handling equipment or employees. Such areas will be kept in good repair.

When a difference in road or working levels exist, means such as ramps, blocking, or grading must be used to ensure the safe movement of vehicles between the two levels.

Material Storage

Material stored inside buildings under construction must not be placed within 6 feet of any hoist way or inside floor openings. If stored within 10 feet of an exterior wall that does not extend above the top of the material, the material must be positively barricaded, placed, or secured to prevent it from falling.

Each employee who is required to work on stored material in silos, hoppers, tanks, and similar storage areas will be equipped with personal fall arrest equipment meeting the requirements of our fall protection program.

Materials which may cause a hazardous reaction or unstable condition while in storage must be segregated in storage.

Bagged materials piled more than 5 feet high must be tapered back (except where supported by walls or otherwise), or the sacks will be so tied in horizontal layers as to prevent them from falling or collapsing.

Materials are not permitted to be stored on scaffolds or runways in excess of supplies needed for immediate operations.

Brick stacks must not be more than 7 feet in height. When a loose brick stack reaches a height of 4 feet, it must be tapered back 2 inches in every foot of height above the 4-foot level.

When masonry blocks are stacked higher than 6 feet, the stack must be tapered back one-half block per tier above the 6-foot level.

All nails must be removed from used lumber before stacking. Additionally, lumber must be stacked on level and solidly supported sills and will be so stacked as to be stable and self-supporting. Headers, crosspieces, or other means will be used as needed in the pile to prevent slipping, tipping, or collapsing. Lumber piles cannot exceed 20 feet in height, provided that lumber to be handled manually is not stacked more than 16 feet high.

Mold & Mildew

Molds and mildew are fungi that can be found inside any building in which employees of Parking Concepts, Inc are working. Within the United States, there are about 1,000 species of mold.

Problems may arise when mold starts eating away at materials, affecting the look, smell, and possibly, with the respect to wood-framed buildings, affecting the structural integrity of the buildings.

Molds can grow on virtually any substance, as long as moisture or water, oxygen, and an organic source, **such as wood**, are present. Molds reproduce by creating tiny spores (viable seeds) that usually cannot be seen without magnification. In fact, mold spores are continually floating through both the indoor and outdoor air. These spores alone **do not create a problem**.

The problem occurs when mold spores land on a damp spot and begin growing. They digest whatever they land on in order to survive. Molds can grow on wood, paper, carpet, foods, insulation, and even dust and dirt that gathers in moist areas of a building.

From a contractor standpoint, over time, molds can gradually damage building materials and furnishings. If left unchecked, mold can eventually cause structural damage to a wood framed building, weakening floors and walls as it feeds on moist wooden structural members.

Most molds do not present a true health hazard in the general population. Molds can, however, cause adverse effects by producing allergens and the allergic reactions to mold can be either immediate or delayed. Allergic responses would include hay fever-type symptoms such as runny nose and red eyes.

Should mold, most importantly, black mold, be discovered on any of our job sites, we will notify the owner and advise the owner to seek a professional mold remediation contractor.

Should mold exist on a job site where our employees are working, the following precautionary steps will be taken:

a. Dust mask may be used for personal employee comfort.
b. Items damaged by mold may be discarded as general waste with no special precautions needed.

Signs & Tags

§3340. Accident Prevention Signs

When appropriate, signs and tags will be used to warn of specific hazards. Types of signs are classified according to their use, and their design is regulated by standard. All personnel will be instructed in the meaning of the various types of signs. Sign usage includes:

a. Danger Signs (Red, Black & White): indicates immediate danger and denotes that special precautions are necessary.
b. Caution Signs (Yellow Background): warns of a potential hazard or cautions against an unsafe practice.
c. Safety Instruction Signs (White Background): used to provide general instructions and suggestions relative to safety measures.

The wording on signs must be positive, clear, concise, and easy to understand or the sign loses its value.

Accident prevention tags are to warn of hazardous or potentially hazardous conditions that are out of the ordinary, unexpected, or not readily apparent. They are not used where signs, guarding or other positive means of protection are used. All tags must have:

A signal word: "Danger," "Caution," "Warning," "BIOHAZARD" (or its symbol) and a major message, and

A major message: "High Voltage" or "Do not start". (Major messages indicate the specific hazardous condition.)

The color scheme is basically the same as for signs:

red = danger

yellow = caution

orange =warning

fluorescent orange =biological hazard

Danger Tags: indicate an immediate hazard that presents a threat of death or serious injury.

Caution Tags: indicate a non-immediate hazard or unsafe practice that presents a lesser threat of injury.

Warning Tags: indicate a hazard between "Danger" and "Caution".

Biohazard Tags: indicate the actual or potential presence of a biological hazard and identify equipment, rooms, containers, etc. that may be contaminated.

Pay attention to signs and tags and realize that they are in place for only one reason – your safety.

§1629. Stairways and Ladders

Stairways are an acceptable method for gaining access to floors and working levels of buildings and scaffolds.

Note: In addition to the stairways required, buildings 60 ft. or more in height or 48 ft. below ground level require an elevator.

Stairways, ramps or ladders will be provided at all points where a break in elevation of 18 inches or more occurs in a frequently traveled passageway, entry or exit.

Stairways must be installed as follows:

a. In buildings of up to three stories or 36 ft. in height, at least one stairway is required.
b. In buildings of more than three stories or 36 ft. in height, two or more stairways are required.
c. A stairway to a second or higher floor must be installed before studs are raised to support the next higher floor.
d. In steel frame buildings, a stairway must be installed leading up to each planked floor.
e. In concrete buildings, a stairway must be installed to the floor that supports the vertical shoring system.
f. Stairways will be at least 24 in. in width and will be equipped with stair rails, handrails, treads, and landings.
g. All guardrails railings, including their connections and anchorage, will be capable of withstanding a load as specified in 1620(c).
h. Handrails must be 34 in. to 38 in. above the tread nosing.
i. Wooden posts will be not less than 2 in. by 4 in. in cross section, spaced at 8-foot or closer intervals. Wooden top railings will be smooth and of 2-in. by 4-in. or larger material. Double, 1-in. by 4-in. members may be used as top railings when certain conditions are met.
j. Railings and toeboards must be installed around stairwells.
k. The stairway will have landings at each floor, or level, of not less than 30 in. in the direction of travel and extend at least 24 in. in width at every 12 feet or less of vertical rise.
l. Stair steps must be illuminated with at least 5-ft. candles of light and all lamps must be guarded.

Tools - Hand

§1699. Hand Tools.
§2395.45. Equipment Connected by Cord and Plug.
§3382. Eye and Face Protection.
§3557. Switches and Controls for Portable Tools.

When using hand and power tools, appropriate PPE will be used to provide protection for the eyes, skin, ears, hands, feet, and respiratory system in accordance with our PPE Program.

Any tool not in compliance with Cal/OSHA or ANSI standards will not be used. Such tools, as well as any tools found to be defective in any manner, will be identified as unsafe by tagging and removed from the job site.

All hand and power tools and similar equipment, whether furnished by the employer or the employee, will be maintained in a safe condition.

Here are basic procedures for the use of hand tools:

a. Hand tools will be used only for the purpose for which they are designed.
b. Hand tools will be kept clean and, where appropriate, oiled.
c. Hand tools which are damaged will not be used.
d. Handheld cutting tools will be kept sharp and will be sheathed or retracted when not in use.
e. When using a striking tool such as a hammer or chisel, safety glasses or safety goggles will be used.
f. Do not force tools.
g. If you are unfamiliar with the proper procedure for using a tool, ask your Supervisor for instruction.
h. Power tools may be operated only by those persons who are qualified by training or experience.
i. Do not alter guards on power tools; wear appropriate PPE.
j. Electrical tools must be grounded, and, in the absence of permanent wiring, a Ground Fault Circuit Interrupter must be used.
k. Electric tools will not be lifted by their cords and pneumatic tools will not be lifted by their hoses.

Tools - Pneumatic Powered

CCR Title 8, § 1707 - Power-Operated Hand Tools
CCR Title 8, § 1704 - Pneumatically Driven Nailers and Staplers

Pneumatic powered tools must be safeguarded whenever there are hazardous employee exposures. This is especially important for point of operation guarding.

Three specific hazards associated with pneumatic powered tools which are unique to their use are noise levels, tool retention, and air hose pressure.

Care must be taken to assure that noise levels are within acceptable limits (noise monitoring may be necessary) and, if required, engineering controls and/or ear protection will be employed.

Eye protection will be worn when using pneumatic powered tools in accordance with the owner/operator's manual.

Pneumatic power tools will be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.

The manufacturer's safe operating pressure for hoses, pipes, valves, filters, and other fittings will not be exceeded.

The use of hoses for hoisting or lowering tools will not be permitted.

All hoses exceeding 1/2-inch inside diameter will have a safety device at the source of supply or branch line to reduce pressure in case of hose failure.

Pneumatically Driven Nailers and Staplers

All pneumatically driven nailers and staplers, with the exception of light-duty nailers and staplers, will have a safety device on the muzzle to prevent the tool from ejecting fasteners, unless the muzzle is in contact with the work surface.

Note: Light-duty nailers and staplers are designed to only drive fasteners meeting both of these requirements: 1) Fasteners 1-inch nominal length or shorter. 2) Fasteners made from wire with cross sectional area less than 18 ASWG. The use of a trigger, workpiece contact and/or other operating control, separately or in some combination or sequence, actuates the tool. Modes of actuation include "bump fire" and sequential modes.

Operating Controls will not be removed, tampered with, altered, or otherwise disabled.

Pneumatically driven nailers and staplers will be connected to the air supply with a safety disconnect consisting of a spring loaded shut-off valve and a positive locking mechanism to prevent the tool from becoming accidentally disconnected. They will be disconnected from the air supply when performing any maintenance or repair on the tool or clearing a jam.

Tools will be equipped with a fitting that will discharge all compressed air in the tool at the time the fitting or hose coupling is disconnecting.

On roofs sloped steeper than 7:12 the air hose will be secured at the roof level in such a manner as to provide ample, but not excessive, amounts of hose.

Training will be provided to operators of pneumatically driven nailers and staplers. This training will consist of, but not be limited to:

a. The Code of Safe Practices for pneumatically driven nailers and staplers.
b. The hazards related to each mode of actuation for pneumatically driven nailers and staplers.
c. Hands-on training to verify that the operator understands the operating and safety instructions.

Training will be provided by a qualified person and will take place prior to initial assignment. Refresher training will occur when the operator has been observed using the pneumatically driven nailer or stapler in an unsafe manner or when the operator has been involved in an accident.

Valley Fever

Valley fever, also called Coccidioidomycosis or “cocci”, is an illness caused by a fungus found in soil in parts of California. Areas around the Central Valley and Central Coast may be at higher risk of exposure.

California law AB 203 requires that employees working outdoors in high Valley Fever counties receive training about the risk of exposure and how to prevent it. Employees will receive initial training and then retraining annually thereafter.

Prevention

Prior to commencing work, the following should be done to help prevent employees from contracting Valley Fever:

a. Determine if the job site is in an area where Valley Fever has been found. The following counties have been known to have the highest rates of Valley Fever among residents: Fresno, Kern, Madera, Merced, Monterey, San Joaquin, San Luis Obispo, Santa Barbara, Tulare, and Ventura. Check with the local health department to determine if cases are known to occur near the work area.

b. Ensure all employees have been provided with Valley Fever training. Employees must receive initial training on Valley Fever and then annually thereafter. This applies to all employees working in the field.

c. Limit exposure to dust in areas where Valley Fever is common. Efforts will be made to minimize the amount of dust on the job site. Work may be limited or suspended during heavy winds or dust storms.

d. Always keep soil wet. To reduce dust from disturbed soil, keep the soil wet before, during and after any earth moving work.

e. Select the proper heavy equipment. If possible, vehicles used will be enclosed and equipped with air-conditioned cabs that use a high-efficiency particulate air (HEPA) filter.

f. Work upwind. If possible, digging or conducting other soil disturbing work will be done upwind to reduce dust exposure.

g. Use respiratory protection. When exposure to dust is unavoidable, employees will be provided with particulate filters rated N95, N99, N100, P100, or HEPA.

    1. When respirators are required, we will implement our Respiratory Protection Program.

Reducing the Spread of Spores

a. Wash off dirt prior to leaving the job site. Equipment, tools, and vehicles will be cleaned with water to remove soil prior to leaving the job site.

b. Separate “on-the-job” and “off-the-job” clothes and shoes. Employees will be encouraged to use separate clothes and shoes for on-the-job and off-the-job.

c. Shower after shift. Employees are encouraged to shower and rinse off dirt as soon as possible after completing their shift.

If an employee shows symptoms of Valley Fever

Early detection and medical attention are important when it comes to Valley Fever. It can prevent employees from missing work or developing long-term disabilities.

If an employee reports having symptoms, we will:

a. Send the employee to a health care provider who is knowledgeable about Valley Fever.
b. Provide the health care provider with details about the location of the worksite and dust or soil exposure.
c. Report any cases to Cal-OSHA within 24 hours that result in an employee hospitalization.

Wildfire Smoke Exposure

Overview

With wildfires becoming a more regular occurrence, the hazard to employees from smoke inhalation has increased. It is the responsibility of Parking Concepts, Inc to ensure that our employees are protected from that hazard. CalOSHA Title 8, Section 5141.1 - Protection from Wildfire Smoke states that we must take precautions to prevent employee exposure when the current Air Quality Index (current AQI) for PM2.5 is 151 or greater (regardless of the AQI for other pollutants) and it's reasonably anticipated that employees may be exposed to wildfire smoke.

Note: The following workplaces and operations are exempt:

a. **Enclosed buildings or structures in which the air is filtered by a mechanical ventilation system and the employer ensures that windows, doors, bays, and other openings are kept closed to minimize contamination by outdoor or unfiltered air.**

b. **Enclosed vehicles in which the air is filtered by a cabin air filter and the employer ensures that windows, doors, and other openings are kept closed to minimize contamination by outdoor or unfiltered air.**

c. **The employer demonstrates that the concentration of PM2.5 in the air does not exceed a concentration that corresponds to a current AQI of 151 or greater by measuring PM2.5 levels at the worksite in accordance with Appendix A.**

d. **Employees exposed to a current AQI for PM2.5 of 151 or greater for a total of one hour or less during a shift.**

e. **Firefighters engaged in wildland firefighting.**

Note: For workplaces covered by section 5141.1 - Protection from Wildfire Smoke, an employer that complies with section 5141.1 will be considered compliant with sections 5141 and 5155 for the limited purpose of exposures to a current AQI for PM2.5 of 151 or greater from wildfire smoke.

Definitions

Current Air Quality Index (Current AQI) means the method used by the U.S. Environmental Protection Agency (U.S. EPA) to report air quality on a real-time basis. Current AQI is also referred to as the “NowCast,” and represents data collected over time periods of varying length in order to reflect present conditions as accurately as possible.

Air Quality Index (AQI) Categories for PM2.5	Levels of Health Concern
0 to 50	Good
51 to 100	Moderate
101 to 150	Unhealthy for Sensitive Groups
151 to 200	Unhealthy
201 to 300	Very Unhealthy
301 to 500	Hazardous

The current AQI is divided into six categories as shown in the table below, adapted from Table 2 of Title 40 Code of Federal Regulations, Part 58, Appendix G.

NIOSH means the National Institute for Occupational Safety and Health of the U.S. Centers for Disease Control and Prevention. NIOSH tests and approves respirators for use in the workplace.

PM2.5 means solid particles and liquid droplets suspended in air, known as particulate matter, with an aerodynamic diameter of 2.5 micrometers or smaller.

Wildfire Smoke means emissions from fires in “wildlands” or sparsely populated geographical areas covered primarily by grass, brush, trees, crops, or combination thereof, or in adjacent developed areas.

Communication

Parking Concepts, Inc will establish and implement a system for communicating wildfire smoke hazards in a form readily understandable by all affected employees, including provisions designed to encourage employees to inform the employer of wildfire smoke hazards at the worksite without fear of reprisal. Our system will include effective procedures for:

a. Informing employees of the current AQI for PM2.5 and of protective measures available to reduce their wildfire smoke exposures.
b. Encouraging employees to inform the employer of worsening air quality and any adverse symptoms that may be the result of wildfire smoke exposure such as asthma attacks, difficulty breathing, and chest pain.

Identification of Harmful Exposures

Parking Concepts, Inc must determine employee exposure to PM2.5 for worksites covered by Section 5141.1 before each shift and periodically thereafter, as needed, by any of the following methods:

a. Check AQI forecasts and the current AQI for PM2.5 from any of the following: U.S. EPA AirNow website, U.S. Forest Service Wildland Air Quality Response Program website, California Air Resources Board website, local air pollution control district website, or local air quality management district website; or
b. Obtain AQI forecasts and the current AQI for PM2.5 directly from the EPA, California Air Resources Board, local air pollution control district, or local air quality management district by telephone, email, text, or other effective method; or
c. Measure PM2.5 levels at the worksite and convert the PM2.5 levels to the corresponding AQI in accordance with Appendix A of Section 5141.1 - Protection from Wildfire Smoke.

Exception: These do not apply when an employer assumes the current AQI for PM2.5 is greater than 500 and uses that assumption to provide mandatory respiratory protection.

Measuring PM2.5 Levels at the Worksite

Parking Concepts, Inc may use a direct-reading particulate monitor to determine PM2.5 levels for determining if harmful exposure exists. If this is necessary, we will select a monitor that:

a. Does not underestimate employee exposures to wildfire smoke; or
b. If it does underestimate wildfire smoke exposures, Parking Concepts, Inc will obtain information on the possible error of the monitor from the manufacturer or other published literature. We will account for the error of the monitor when determining exposures to PM2.5 to ensure that employee exposure levels are not underestimated.

The monitor also must be designed and manufactured to measure the concentration of airborne particle sizes ranging from at least an aerodynamic diameter of 0.1 micrometers up to and including 2.5 micrometers.

The monitor we use must be calibrated, maintained, and used, including the use of necessary accessories, in accordance with the manufacturer’s instructions for accurately measuring PM2.5 concentrations.

The following table will be used to convert the PM2.5 concentration to the AQI for PM2.5.

PM2.5 in Micrograms per Cubic Meter (µg/m3)	Air Quality Index (AQI) Categories for PM2.5
0 to 12.0	0 to 50
12.1 to 35.4	51 to 100
35.5 to 55.4	101 to 150
55.5 to 150.4	151 to 200
150.5 to 250.4	201 to 300
250.5 to 500.4	301 to 500

Control of Harmful Exposures to Employees

As with all hazards, there are 3 methods to control employee's exposures: engineering controls, administrative controls, and personal protective equipment. The following will describe the order of importance and examples for each.

Engineering Controls

First, Parking Concepts, Inc will reduce employee exposure to PM2.5 to less than a current AQI of 151 by using engineering controls whenever feasible. For example, by providing enclosed buildings, structures, or vehicles where the air is filtered. If engineering controls are not sufficient to reduce exposure to PM2.5 to less than a current AQI of 151, then exposures will be reduced as much as feasible.

Administrative Controls

Whenever engineering controls are not feasible or do not reduce employee exposures to PM2.5 to less than a current AQI of 151, Parking Concepts, Inc will also implement administrative controls, if practicable. These might include relocating work to a location where the current AQI for PM2.5 is lower, changing work schedules, reducing work intensity, or providing additional rest periods.

Control by Respiratory Protective Equipment

Parking Concepts, Inc will provide respirators to all employees for voluntary use in accordance with our respiratory protection program and will encourage them to use them when exposures to current AQI for PM2.5 levels are equal to or greater than 151, but do not exceed 500.

Respirators will be NIOSH-approved devices that effectively protect the employees from inhalation of PM2.5, such as N95 filtering facepiece respirators. Respirators must be cleaned, stored, maintained, and replaced so that they do not present a health hazard to the users.

Note: Appendix B of section 5141.1 will be used in lieu of Appendix D to Section 5144 - Respiratory Protection for training regarding voluntary use of respirators.

Note: For voluntary use of filtering facepieces, such as N95 respirators, some of the requirements of section 5144 do not apply, such as fit testing and medical evaluations.

When the current AQI for PM2.5 exceeds 500, respirators will be required to be used in accordance with our Respiratory Protection Program. The employees will be provided respirators with an assigned protection factor so that the PM2.5 levels inside the respirator correspond to an AQI less than 151.

Emergencies

In emergencies, including rescue and evacuation, requirements regarding engineering and administrative controls, do not apply. In these scenarios, Parking Concepts, Inc will use respiratory protective equipment. Emergencies include utilities, communications, and medical operations, when such operations are directly aiding firefighting or emergency response.

Training and Instruction

Parking Concepts, Inc must also provide employees with effective training on wildfire smoke hazards. At a minimum, this will contain the following information from Appendix B of Section 5141.1 - Protection from Wildfire Smoke.

Health Effects of Wildfire Smoke

Although there are many hazardous chemicals in wildfire smoke, the main harmful pollutant for people who are not very close to the fire is “particulate matter,” the tiny particles suspended in the air.

Particulate matter can irritate the lungs and cause persistent coughing, phlegm, wheezing, or difficulty breathing. Particulate matter can also cause more serious problems, such as reduced lung function, bronchitis, worsening of asthma, heart failure, and early death.

People over 65 and people who already have heart and lung problems are the most likely to suffer from serious health effects.

The smallest—and usually the most harmful—particulate matter is called PM2.5 because it has a diameter of 2.5 micrometers or smaller.

Right to Obtain Medical Treatment Without Fear of Reprisal

Parking Concepts, Inc allows employees who show signs of injury or illness due to wildfire smoke exposure to seek medical treatment and will not punish affected employees for seeking such treatment. When necessary, Parking Concepts, Inc will also provide for prompt medical treatment of employees in the event of serious injury or illness caused by wildfire smoke exposure.

How Employees can Obtain the Current AQI for PM2.5.

The AQI is a measurement of how polluted the air is and various government agencies monitor the air at locations throughout California to report the current AQI for those places. An AQI over 100 is unhealthy for sensitive people and an AQI over 150 is unhealthy for everyone.

Although there are AQIs for several pollutants, Title 8, section 5141.1 about wildfire smoke only uses the AQI for PM2.5. The easiest way to find the current and forecasted AQI for PM2.5 is to go to www.AirNow.gov and enter the zip code of the location where you will be working. The current AQI is also available from the U.S. Forest Service at https://tools.airfire.org/. The EPA website www.enviroflash.info can transmit daily and forecasted AQIs by text or email for particular cities or zip codes.

Requirements in Title 8, Section 5141.1 About Wildfire Smoke

If employees may be exposed to wildfire smoke, then Parking Concepts, Inc is required to find out the current AQI applicable to the worksite. If the current AQI for PM2.5 is 151 or more, we are required to:

a. Check the current AQI before and periodically during each shift.
b. Provide training to employees.
c. Lower employee exposures.
d. Provide respirators and encourage their use.

Two-Way Communication System

Parking Concepts, Inc will alert employees when the air quality is harmful and what protective measures are available to employees. We will encourage employees to inform their supervisors if they notice the air quality is getting worse, or if they are suffering from any symptoms due to the air quality, without fear of reprisal. The method used for communication will be conspicuously posted at the worksite.

Methods to Protect Employees from Wildfire Smoke

Parking Concepts, Inc must take action to protect employees from PM2.5 when the current AQI for PM2.5 is 151 or greater. Examples of protective methods include:

a. Locating work in enclosed structures or vehicles where the air is filtered.
b. Changing procedures such as moving workers to a place with a lower current AQI for PM2.5.
c. Reducing work time in areas with unfiltered air.
d. Increasing rest time and frequency and providing a rest area with filtered air.
e. Reducing the physical intensity of the work to help lower the breathing and heart rates.

The control methods will be posted conspicuously at worksites.

Importance, Limitations, and Benefits of Using a Respirator When Exposed to Wildfire Smoke

Respirators can be an effective way to protect employee health by reducing exposure to wildfire smoke, when they are properly selected & worn. Respirator use can be beneficial even when the AQI for PM2.5 is less than 151, to provide additional protection.

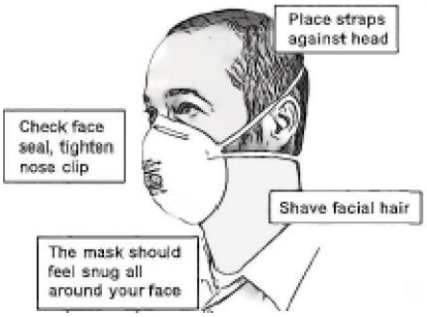
When the current AQI for PM2.5 is 151 or greater, Parking Concepts, Inc will provide our employees with proper respirators for voluntary use. If the current AQI is greater than 500, respirator use is required.

A respirator must be used properly and kept clean.

The following precautions will be taken:

a. Select respirators that are certified for protection against the specific air contaminants at the workplace. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Center for Disease Control and Prevention certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will list what the respirator is designed for (particulates, for example).

Surgical masks or items worn over the nose and mouth such as scarves, T-shirts, and bandannas will not provide protection against wildfire smoke. An N95 filtering facepiece respirator, shown in the image below, is the minimum level of protection for wildfire smoke.



b. Read and follow the manufacturer's instructions on the respirator's use, maintenance, cleaning and care, along with any warnings regarding the respirator's limitations. The manufacturer's instructions for medical evaluations, fit testing, and shaving should also be followed, although doing so is not required by Title 8, section 5141.1 for voluntary use of filtering facepiece respirators.
c. Do not wear respirators in areas where the air contains contaminants for which the respirator is not designed. A respirator designed to filter particles will not protect employees against gases or vapors, and it will not supply oxygen.
d. Employees should keep track of their respirator so that they do not mistakenly use someone else's respirator.
e. Employees who have a heart or lung problem should ask their doctor before using a respirator.

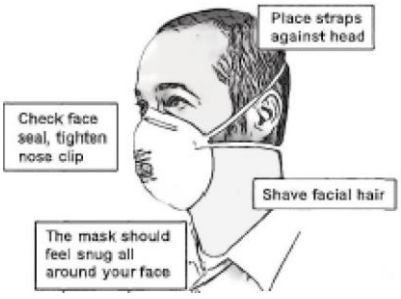
<u>How to Properly Put On, Use, & Maintain the Respirators Provided by the Employer</u>

To get the most protection from a respirator, there must be a tight seal around the face. A respirator will provide much less protection if facial hair interferes with the seal. Loose-fitting powered air purifying respirators may be worn by people with facial hair since they do not have seals that are affected by facial hair.

The proper way to put on a respirator depends on the type and model of the respirator.

For those who use an N95 or other filtering facepiece respirator mask that is made of filter material:

a. Place the mask over the nose and under the chin, with one strap placed below the ears and one strap above.
b. Pinch the metal part (if there is one) of the respirator over the top of the nose so it fits securely.



For a respirator that relies on a tight seal to the face, check how well it seals to the face by following the manufacturer's instructions for user seal checks. Adjust the respirator if air leaks between the seal and the face. The more air leaks under the seal, the less protection the user receives.

Respirator filters should be replaced if they get damaged, deformed, dirty, or difficult to breathe through. Filtering facepiece respirators are disposable respirators that cannot be cleaned or disinfected. A best practice is to replace filtering facepiece respirators at the beginning of each shift.

If you have symptoms such as difficulty breathing, dizziness, or nausea, go to an area with cleaner air, take off the respirator, and get medical help.

Parking Concepts, Inc Section III
Specific Compliance Programs

Bloodborne Pathogens - Exposure Control Plan

§5193. Bloodborne Pathogens

Note: Per CPL 2-2.69, Enforcement Procedures for the Occupational Exposure to Bloodborne Pathogens, the bloodborne pathogens standard does not apply to the construction industry. OSHA has not, however, stated that the construction industry is free from the hazards of bloodborne pathogens. Exposure to bloodborne pathogens would fall under Section 5(a)(1) of the OSH Act which states that "each employer will furnish to each of his employees employment and a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."

Providing first aid or other medical assistance is not the primary job assignment of our designated first aid providers. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from job site incidents and only at the job site where the incident occurred.

Recordkeeping: all work-related injuries from needle-sticks and cuts, lacerations, punctures and scratches from sharp objects contaminated with another person's blood or other potentially infectious materials (OPIM) are to be recorded on the OSHA 300 as an injury.

a. To protect the employee's privacy, the employees name may not be entered on the OSHA 300.
b. If the employee develops a bloodborne disease, the entry must be updated and recorded as an illness.

Note: Our first aid kits do not contain sharps or needles. However, a contaminated sharp, such as a broken pair of glasses, may trigger the above.

Policy Statement

This Exposure Control Plan has been developed to eliminate or minimize the risk of exposure to bloodborne pathogens and other potentially infectious materials. This Plan presents methods and procedures to eliminate and/or minimize the hazards associated with occupational exposure to bloodborne pathogens or other infectious materials.

As a matter of policy, universal precautions will be used.

Additional components of this Plan include exposure determinations by job classification, standard operating procedures to eliminate or reduce the likelihood of disease transmission, the methods of disease transmission, definitions of terms, post exposure procedures and follow-up, training documentation, and recordkeeping.

Compliance with this Plan not only fulfills the requirements of the Occupational Safety and Health Administration, more importantly, it fulfills our desire to maintain a safe working environment and safeguard the health of our employees.

All affected employees should feel free to review this Plan at any time and are encouraged to consult with our Exposure Control Plan Administrator to resolve any issues affecting its implementation. Our Plan is to be made available to the Assistant Secretary of Labor for Occupational Safety and Health or designated representative.

Definitions

All employees should know the "language" of this plan. Because some of the words and/or terms are not used in everyday life, each person must be aware of the definitions so that we are all "reading off the same page."

Below are OSHA definitions:

Assistant Secretary means the Assistant Secretary of Labor for Occupational Safety and Health, or designated representative.

Blood means human blood, human blood components, and products made from human blood.

Bloodborne Pathogens means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).

Clinical Laboratory means a workplace where diagnostic or other screening procedures are performed on blood or other potentially infectious materials.

Contaminated means the presence, or the reasonably anticipated presence, of blood or other potentially infectious materials on an item or surface.

Contaminated Laundry means laundry which has been soiled with blood or other potentially infectious materials or may contain sharps.

Contaminated Sharps means any contaminated object that can penetrate the skin including, but not limited to, needles, scalpels, broken glass, broken capillary tubes, and exposed ends of dental wires.

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

Director means the Director of the National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designated representative.

Engineering Controls means controls (e.g., sharps disposal containers, self-sheathing needles, safer medical devices, such as sharps with engineered sharps injury protections and needleless systems) that isolate or remove the bloodborne pathogens hazard from the work area.

Exposure Incident means a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's duties.

Hand-Washing Facilities means a facility providing an adequate supply of running potable water, soap, and single use towels or hot air-drying machines.

Licensed Healthcare Professional means a person whose legally permitted scope of practice allows him or her to independently perform the activities required §5193(f), *Hepatitis B Vaccination and Post-exposure Evaluation and Follow-up*.

Note: The above activities include actually providing Hepatitis B vaccine, ordering appropriate laboratory test, determining contraindications to vaccination, providing post-exposure prophylaxis and counseling. The legal scope of practice for this professional must allow the independent performance of all the procedures described in paragraph (f), Hepatitis B Vaccination and Post-exposure Evaluation and Follow-up.

HBV means hepatitis B virus.

HIV means human immunodeficiency virus.

Needleless Systems means a device that does not use needles for:

a. The collection of bodily fluids or withdrawal of body fluids after initial venous or arterial access is established,
b. The administration of medication or fluids, or
c. Any other procedure involving the potential for occupational exposure to bloodborne pathogens due to percutaneous injuries from contaminated sharps.

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

Other Potentially Infectious Materials:

a. The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, anybody fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids;
b. Any unfixed tissue or organ (other than intact skin) from a human (living or dead);
c. HIV-containing cell or tissue cultures, organ cultures, and HIV- or HBV-containing culture medium or other solutions, and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

Parental means piercing mucous membranes or the skin barrier through such events as needle-sticks, human bites, cuts, and abrasions.

Personal Protective Equipment is specialized clothing or equipment worn by an employee for protection against a hazard. General work clothes (e.g., uniforms, pants, shirts or blouses) not intended to function as protection against a hazard are not considered to be personal protective equipment.

Production Facility means a facility engaged in industrial-scale, large-volume or high concentration production of HIV or HBV.

Regulation Waste means liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; contaminated sharps; and pathological and microbiological wastes containing blood or other potentially infectious materials.

Research Laboratory means a laboratory producing or using research-laboratory-scale amounts of HIV or HBV. Research laboratories may produce high concentrations of HIV or HBV but not in the volume found in production facilities.

Sharps with Engineered Sharps Injury means a non-needle sharp or a needle device used for withdrawing body fluids, accessing a vein or artery, or administering medications or other fluids, with a built-in safety feature or mechanism that effectively reduces the risk of an exposure incident.

Source Individual means any individual, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to the employee. Examples include, but are not limited to, hospital and clinic patients; clients in institutions for the developmentally disabled; trauma victims; clients of drug and alcohol treatment facilities; residents of hospices and nursing homes; human remains; and individuals who donate or sell blood or blood components.

Sterilize means the use of a physical or chemical procedure to destroy all microbial life including highly resistant bacterial endospores.

Universal Precautions means is an approach to infection control. According to the concept of Universal Precautions, all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

Work Practice Controls means controls that reduce the likelihood of exposure by altering the manner in which a task is performed (e.g., prohibiting recapping of needles by a two-handed technique).

Exposure Control Plan

This Exposure Control Plan is provided for all personnel who, as a result of the performance of their duties, would have reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials.

This Plan will be reviewed and updated annually and whenever necessary as new or modified tasks and procedures are introduced which affect occupational exposure to bloodborne pathogens or other potentially infectious materials. The review and update of this plan will:

a. Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens.

b. Annually document consideration and implementation of appropriate commercially available and effective safer medical devices designed to eliminate or minimize occupational exposure.

First aid providers are employees responsible for direct trauma victim care, who are potentially exposed to injuries for contaminated sharps, will be asked for input on the identification, evaluation, and selection of effective engineering and work practice controls.

This Exposure Control Plan, with a copy of §5193, *Bloodborne Pathogens*, will be made accessible to all employees as well as the Assistant Secretary and the Director (see definitions) who may examine and copy this plan.

Exposure Determination

Three (3) lists will be prepared and they will be maintained at the end of this exposure control plan for bloodborne pathogens & other infectious material, located **here.**

List I: A list of all job classifications in which all employees have occupational exposure.

List II: A list of job classifications in which some employees have occupational exposure.

List III: A list of all tasks and procedures, or groups of closely related tasks and procedures, in which occupation exposure occurs and are performed by employees in job classifications noted in List II.

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Methods of Compliance

Universal precautions will be used. We will treat all trauma victims' blood, bodily fluids, and other potentially infectious materials as if they are known to be infectious. Unfortunately, there is no immediate, practical way to determine if HIV, HBV, and other bloodborne pathogens are present so, to be safe, we will assume they are. Traditionally, isolation of infectious materials has been diagnosis driven. This meant that if a person were diagnosed to have HIV or HBV infection, for example, then isolation precautions would be taken. Because the infection status of each trauma victim cannot be immediately known, it makes sense to treat all trauma victims and their body fluids as if they were infected. The precautions to take depend on the procedures being performed. For example, if one's hands will be in contact with body substances, disposable gloves will be worn. If there is risk of one's eyes being splashed with body fluids, eye protection will be worn. An impermeable barrier must be placed between yourself and the potentially infectious bodily fluids. Overkill is not necessary. Cleaning up a minor spill on a countertop does not require a mask, eye protection, and plastic apron. It does, however, require disposable gloves.

All employees will strictly adhere to the below engineering and work practice controls to eliminate or reduce the possibility of occupational exposure to bloodborne pathogens or other potentially infectious materials. Specific controls and procedures, noted below, will be used to eliminate or minimize employee exposure.

Handwashing Equipment and Procedures:

Hand-washing facilities are provided which are readily accessible to all employees.

Employees will wash their hands and any other skin area exposed to blood or other potentially infectious materials with soap and water immediately or as soon as feasible:

a. After removal of gloves or other personal protective equipment.
b. Following contact with blood or other potentially infectious materials.

Particular attention will be given to fingernails and between fingers and rings under which infectious material may lodge. Furthermore, one should be aware that rings and jewelry are a good hiding place for bloodborne pathogens and other potentially infectious materials.

Examples of situations where handwashing is appropriate:

a. Before and after examining any trauma victim.
b. After handling any soiled waste or other materials.
c. After handling any chemicals or used equipment.

If for some reason hand-washing facilities are not functioning, appropriate antiseptic hand cleaner and clean cloth/paper towels (antiseptic towelettes) will be provided and used. If antiseptic hand cleaner and clean cloth/paper towels are used, hands will be washed with soap and water as soon as feasible.

Eating, Drinking, & Smoking:

There will be no eating, drinking, smoking, applying cosmetics, lip balm, or handling contact lenses in areas where there is a likelihood of occupational exposure to bloodborne pathogens or other potentially infectious materials.

Furthermore, food and drink will not be kept in refrigerators, freezers, shelves, cabinets, on countertops, or benches where blood or other potentially infectious materials are present.

Contaminated Needles & other Contaminated Sharps:

Contaminated needles will not be sheared or broken.

Furthermore, all contaminated needles and other contaminated sharps will not be bent, recapped, or removed unless:

a. It can be demonstrated that no alternative is feasible or that it is required by a specific medical procedure.
b. Recapping or needle removal may be accomplished through the use of a mechanical device or a one-handed method.

Contaminated **reusable** sharps will be placed in appropriate containers immediately or as soon as possible after use until properly reprocessed. These containers will:

a. Be puncture resistant.
b. Have warning labels affixed to containers potentially infectious material and contain the following legend:

Note: The above label will be fluorescent orange or orange-red or predominantly so, with lettering and symbols in a contrasting color.

Labels will be affixed as close as feasible to the container by string, wire, adhesive, or other method that prevents their loss or unintentional removal.

Red bags or red containers may be substituted for labels.

c. Be leak proof on the sides and bottom.

Reusable sharps that are contaminated with blood or other potentially infectious materials will not be stored or processed in a manner that requires employees to reach by hand into the containers where these sharps have been placed.

Contaminated **non-reusable** sharps will be discarded immediately or as soon as feasible and placed in containers that:

a. Are closable
b. Are puncture resistant
c. Are leak proof on sides and bottom
b. Have warning labels affixed that contain the following legend:

Note: The above label will be fluorescent orange or orange-red or predominantly so, with lettering and symbols in a contrasting color.

Labels will be affixed as close as feasible to the container by string, wire, adhesive, or other method that prevents their loss or unintentional removal.

Red bags or red containers may be substituted for labels.

Contaminated **non-reusable** sharps will not be stored or processed in such a manner that requires employees to reach by hand into the containers where these sharps have been placed.

During use, containers for contaminated sharps must be:

a. Easily accessible to our employees.
b. Located as close as feasible to the immediate area where sharps are used or can be reasonably anticipated to be found.
c. Maintained upright throughout use.
d. Replaced routinely and not be allowed to overfill.

If leakage is possible when removing a container of contaminated sharps, it will be placed in a second container with the following container requirements:

a. It will be disposable,
b. It will be constructed to contain all contents and prevent leakage during handling, storage, transport, or shipping, and
c. Colored coded red or labeled as noted above.

Reusable containers will not be opened, emptied, or cleaned manually or in any other manner which would expose employees to the risk of percutaneous (introduced through the skin such as a cut) injury.

Other Regulated Waste - Containment:

The provisions that apply to contaminated sharps, above, apply to other regulated waste.

Disposal of Contaminated Sharps & other Regulated Waste:

The actual disposal of all regulated waste will be in compliance with applicable state laws.

Specimens of Potentially Infectious Materials:

Specimens of blood and potentially infectious materials will be placed in a container which prevents leakage during collection, handling, processing, storage, transport, or shipping.

Splashing, Spraying of Potentially Infectious Materials:

All procedures involving blood or other potentially infectious materials will be performed in such a manner as to minimize splashing, spraying, spattering, and the generation of droplets of these substances.

Mouth Pipetting:

Mouth pipetting and mouth suction of blood or other potentially infectious materials is prohibited.

Exposure Control Plan Administrator

Our designated Exposure Control Plan Administrator will be knowledgeable in all aspects of this Plan as it relates to our operations and be available to answer questions raised by our first aid providers. The Exposure Control Plan Administrator may call upon professionals in the Medical Arts to field questions that are of technical nature outside of the Administrator's area of expertise.

The Exposure Control Plan Administrator will:

a. Ensure this Plan is kept current.
b. Ensure training is provided as required.
c. Maintain all records associated with this plan.

Designated First Aid Provider

Before one may be designated as a first aid provider, he/she must have a valid certificate in first aid training from the U.S. Bureau of Mines, the Red Cross, or equivalent training that can be verified by documentary evidence. No person is to administer any medical assistance for which they are not appropriately trained. It is noted that the rendering of first aid is not the primary job of our designated first aid providers.

Personal Protective Equipment (PPE)

In spite of work practice and engineering controls, there is a requirement for appropriate personal protective equipment to provide an impermeable barrier between potentially infectious materials and the employees work clothes, street clothes, undergarments, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time which the protective equipment will be used.

Employees will use appropriate personal protective equipment when there is a possibility of occupational exposure to bloodborne pathogens or other potential infectious materials.

Personal protective equipment will be provided in appropriate sizes and at no cost to the employees. Further, maintenance and replacement of personal protective equipment will be provided at no cost to the employee.

Personal protective equipment will be discarded immediately if its ability to function as a barrier is compromised.

Most importantly, employees must understand that personal protective equipment is useless unless it provides an impermeable barrier between bloodborne pathogens and other potentially infectious materials and the employee's clothes, skin, eyes, mouth, or other mucous membranes.

Personal Protective Equipment is considered appropriate if it prevents potentially infectious materials from reaching work/street clothing or body surface when used under normal conditions.

Disposable Gloves:

Disposable, single use gloves, such as surgical or examination gloves will be worn when it can be reasonably anticipated that the employee may have hand contact with blood or other potentially infectious materials and when handling or touching contaminated items or surfaces. Disposable gloves will always be used when there is a possibility of contact with bloodborne pathogens or other potentially infectious materials.

Disposable gloves will never be washed, decontaminated, or reused.

Disposable gloves will be replaced as soon as practical when contaminated or as soon as feasible if they are torn, punctured, or their ability to function as a barrier is compromised.

Should any employee be allergic to the normal gloves provided, an appropriate alternative (such as hypoallergenic and/or powderless gloves) will be provided in the proper size at no cost to the employee.

Utility Gloves:

Utility gloves may be used for general cleanup (not for any trauma victim procedure) when there is anticipated exposure to bloodborne pathogens or other potentially infectious materials. Utility gloves may be decontaminated for re-use if the integrity of the gloves is not compromised. They will be discarded if they are cracked, peeling, torn, punctured, or exhibit signs of deterioration or when their ability to function as a barrier is compromised.

Eye and Respiratory Protection:

Eye (goggles, glasses, face shield, etc.) and respiratory (mask, etc.) protection will be used when it can reasonably be expected that bloodborne pathogens or other potentially infectious materials may splash or spray in or around the eyes, nose, mouth, and general head area of the employee.

Protective Body Clothing:

Protective body clothing such as gowns, aprons, lab coats, etc. will be worn as determined by the professional judgment of the employee in relation to task. The protective body clothing will certainly be worn where there can reasonably be expected exposure to bloodborne pathogens or other potentially infectious materials to the body area.

Laundry:

Personal protective equipment will be cleaned, laundered, and disposed of at no cost to the employee.

Note: In rare and extraordinary circumstances, an employee, in her/his professional judgment, may decline to temporarily and briefly wear personal protective equipment if he/she deems that the equipment would prevent the delivery of health care or would have increased the hazard of occupational exposure to the employee or his/her co-workers. Should this event occur, it will be documented, investigated, and procedures will be developed to prevent a reoccurrence.

Housekeeping

Housekeeping is an ongoing, never ending procedure which not only enhances our work environment but also eliminates health risk to our personnel. In the area of bloodborne pathogens and other hazardous materials, to ensure proper cleaning, decontamination, sterilization, and disinfecting of surfaces within our work area, cleaning will be accomplished only by employees who have received training in universal precautions and the provisions of this plan. The documented Housekeeping Schedule & Checklist is found at the end of this exposure control plan for bloodborne pathogens & other infectious material. This Schedule will be adhered to following an incident that results in the potential exposure to bloodborne pathogens or other potentially infectious materials.

Broken, potentially infected glassware should be picked up and disposed of using mechanical means such as a brush and dust pan or forceps.

All sharps will be stored in a manner that allows easy access and safe handling.

Infectious waste will be placed in containers that are color coded red. These containers will be decontaminated as soon as practical.

Subsequent to rendering any procedures, employees will ensure that all surfaces on which blood, body fluids, bloodborne pathogens, or other infectious materials may be present are cleaned with an appropriate disinfectant.

Hepatitis B Epidemiology

Hepatitis B (serum hepatitis) routes of infection include parenteral, oral, or direct contact. The virus can also spread by contact with the respiratory tract. Its sources include contaminated needles and surgical instruments as well as contaminated blood products. Hepatitis B virus has also been found in urine. Further, the hepatitis B virus can live for up to seven (7) days on a dry surface and can be easily be transmitted by a single needle stick. Its incubation period is quite lengthy generally between 45 and 180 days. It affects all age groups. Recovery from hepatitis B does provide immunity. Generally, one can expect a complete recovery from viral hepatitis; however, it is potentially fatal depending on many factors including the virulence (aggressiveness) of the virus, prior hepatic damage, and natural barriers to damage and disease of the liver. It is possible for viral hepatitis to lead to fulminating viral hepatitis and sub-acute fatal viral hepatitis both of which are fatal. Onset symptoms may include headache, elevated temperature, chills, nausea, dyspepsia, anorexia, general malaise, and tenderness over the liver. These types of symptoms will last about one (1) week, and then subside, and jaundice will occur. Jaundice is caused by damaged liver cells. The convalescent stage begins with the disappearance of the jaundice and may last several months. Recovery is expected in six (6) months.

Risk of Exposure

Per the Department of Human Services of the Center for Disease Control, below is the risk of infection after occupational exposure:

HBV:

First aid providers who have received hepatitis B vaccine and have developed immunity to the virus are at virtually no risk for infection. For an unvaccinated person, the risk from a single needle-stick or cut exposure to HBV-infected blood ranges from 6-30% and depends on the hepatitis B e antigen (HBeAg) status of the source individual. In individuals who are both hepatitis B surface antigen (HBsAG) positive and HBeAg positive have more virus in their blood and are more likely to transmit HBV.

HCV:

Based on limited studies, the risk for infection after a needle-stick or cut exposure to HCV-infected blood is approximately 1.8%. The risk following a blood splash is unknown, but is believed to be very small; however, HCV infection from such an exposure has been reported.

HIV:

The average risk of HIV infection after a needle stick or cut exposure to HIV-infected blood is 0.3% (i.e., three-tenths of one percent, or about 1 in 300). Stated another way, 99.7% of needle-stick/cut exposures do not lead to infection.

The risk after exposure of the eye, nose, or mouth to HIV-infected blood is estimated to be, on average, 0.1% (1 in 1,000).

The risk after exposure of the skin to HIV-infected blood is estimated to be less than 0.1%. A small amount of blood on intact skin probably poses no risk at all. There have been no documented cases of HIV transmission due to an exposure involving a small amount of blood on intact skin (a few drops of blood on skin for a short period of time). The risk may be higher if the skin is damaged (for example, by a recent cut) or the contact involves a large area of skin or is prolonged (for example, being covered in blood for hours).

All employees with occupational exposure are encouraged to accept the hepatitis B vaccination.

Hepatitis B Vaccination

The hepatitis B vaccination series will be provided, at no cost, to all unvaccinated first aid providers as soon as possible (within 24 hours of initial exposure). All exposed first aid provider employees are encouraged to take this vaccination series unless they have previously received the complete hepatitis B vaccination series; antibody testing has revealed that the employee is immune; or the vaccine is contraindicated (not recommended) for medical reasons. Post-exposure evaluation, prophylaxis (prevention of or protection from disease), & follow-up will be provided at no cost to the employee.

The Hepatitis B vaccination will be performed under the supervision of a licensed physician or other licensed healthcare professional. All laboratory tests will be conducted by an accredited laboratory at no cost to the employee.

Should routine booster dose(s) of hepatitis B vaccine (as recommended by the U.S. Public Health Service at a future date) be required, they will be provided at no cost as long as the employee remains a first aid provider.

An employee may decline the Hepatitis B vaccination and this declination will not reflect unfavorably upon him/her; however, this declination must be in writing. See the Hepatitis B Declination Form.

It is important to note that if a first aid provider initially declines the hepatitis B vaccination series, he/she may decide at a later date to accept the vaccination series and it will be provided at no cost assuming he/she is still occupationally exposed to bloodborne pathogens or other potentially infectious materials.

Sharps Injury Log

A Sharps injury log will be maintained for the recording of percutaneous injuries from contaminated sharps.

The information on the log will be recorded and maintained in such manner as to protect the confidentiality of the injured employee.

The sharps injury log will contain:

a. The type and brand of device involved in the incident.
b. The department or work area where the exposure incident occurred.
c. An explanation of how the incident occurred.

The sharps injury log will be maintained for the period of five years.

First Aid Provider Input

As a matter of policy, all first aid providers who are responsible for first aid delivery as an additional job are encouraged to suggest methods to improve our engineering and job site controls. This input may be made verbally to the Plan Administrator at any time. Additionally, during the annual refresher training, suggestions will be solicited.

Plan Review

This plan will be reviewed, and if necessary, updated annually to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure. As new medical devices are developed which reduce employee exposure, they will be introduced into our practice. A review of the “Sharps Log” will help identify problem areas and/or ineffective devices which may need replacement.

Post-Exposure Evaluation and Follow-Up

The information that has preceded *Post-Exposure Evaluation and Follow-up* has dealt with the methods to restrict occupational exposure to bloodborne pathogens and other infectious materials. Post-exposure evaluation and follow-up deals with the steps to take immediately following a potential exposure incident and the steps that will be taken over time to protect our employees from further health risk.

All incidents involving exposure to blood or other potentially infectious materials will be reported to the Exposure Control Plan Administrator, in writing, before the end of the shift in which the incident occurred using the Exposure Incident Report. This Report will be prepared regardless of whether or not there has been an "Exposure Incident" as defined in this Plan and in §5193. A separate Exposure Incident Report will be completed for each employee who was occupationally exposed.

Information in this Report will include:

a. The date and time the incident occurred.
b. A brief description of the events leading up to the exposure (what happened).
c. The name of the individual exposed.
d. The route of exposure.
e. “Source individual” and “exposed individual” information, including the acceptance or rejection of hepatitis B vaccination series.
f. A determination of whether or not an actual "exposure incident" occurred. Refer to Definitions in this Plan or §5193.

The Exposure Control Plan Administrator or his authorized representative will review the Exposure Incident Report and determine if methods or procedures may be altered to prevent a reoccurrence of the incident.

Further, an occupational bloodborne pathogens exposure incident which results in the recommendation for hepatitis B vaccination would be recorded on OSHA Form 300 as an injury. See Recordkeeping.

All unvaccinated employees who have assisted in any situation involving blood will be afforded the opportunity to receive the hepatitis B vaccination series as soon as possible but not later than twenty-four (24) hours after the situation.

A confidential medical evaluation and follow-up will be provided immediately, at no cost, to the employee. The healthcare professional evaluating an employee after an exposure incident will be provided a copy of §5193.

Further, the healthcare professional will be provided a description of the exposed employee's duties as they relate to the exposure incident; documentation of the route(s) of exposure; the circumstances under which the exposure occurred; the results of the source individual's blood testing, if available; and all medical records relevant to the appropriate treatment of the employee including vaccination status which is maintained by our office. See Recordkeeping.

The confidential medical evaluation and follow-up will include:

a. Documentation of the route(s) of exposure.
b. The circumstances under which the exposure incident occurred.
c. The identification and documentation of the source individual, unless it can be established that the identification is not feasible or prohibited by state or local law.
d. The exposed employee's blood will be collected as soon as feasible and tested after consent is obtained.

   Note: If the employee consents to baseline blood collection but does not consent at that time for HIV serologic testing, the sample will be preserved for at least 90 days. If, within 90 days of the exposure incident, the employee elects to have the baseline sample tested, such testing will be done as soon as feasible.

e. The source individual's blood will be tested as soon as feasible to determine HBV and HIV infectivity unless it is already known, in which case this procedure is not necessary.

If consent to test the source individual's blood cannot be obtained the following will occur:

a. It will be established and documented that legally required consent cannot be obtained.
b. When the source individual's consent is not required by law, the source individual's blood will be tested, and the results documented.

The results of the source individual's testing will be made available to the exposed employee and the employee will be informed of applicable laws and the identity and infectious status of the source individual.

The employee will be provided post-exposure prophylaxis, when medically indicated, and counseling.

The employee will be provided with a copy of the healthcare professional's written opinion within 15 days of the completion of the evaluation. The written opinion will be limited to:

a. Whether Hepatitis B vaccination is indicated and if the employee has received such vaccination.
b. An indication that the employee has been informed of the results of the evaluation.
c. An indication that the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.

All other findings or diagnoses will remain confidential and will not be included in the written report.

Recordkeeping

Complete and accurate medical records will be maintained for each employee with occupational exposure. These records will remain confidential and will not be disclosed or reported, without the employee's express written consent, to any person within or outside the job site, except as required by law.

We will ensure that all records required by §3204, Access to Employee Exposure and Medical Records, are made readily available upon request of an employee as well as the Assistant Secretary & the Director for examination and copying. Medical records must have the written consent of employee before being released.

Per §3204(d), medical records will be maintained for at least the duration of employment plus 30 years. If we cease to do business, these records will be transferred to the successor employer. If there is no successor employer, we will notify affected current employees of their rights of access to these records at least three (3) months prior to cessation of business and notify the Director of NIOSH in writing of the impending disposal of records at least three (3) months prior to disposal. If we regularly dispose of records required to be maintained for at least thirty years, we may, with at least a (3) month notice, notify the Director of NIOSH on an annual basis of the records intended to be disposed of in the coming year.

Included in the employee's medical record will be:

a. The employee's name and social security number.
b. A copy of the employee's hepatitis B vaccination status including the date of all the hepatitis B vaccinations and any medical records relative to the employee's ability to receive vaccination.
    1. If the employee has declined to receive the hepatitis B vaccination series when appropriate, this declination will be included in the person's medical records.
c. A copy of all results of examinations, medical testing, and follow-up procedures as required following an exposure incident.
d. The employer's copy of the healthcare professional's written opinion following an exposure incident.
e. A copy of all information provided to the healthcare professional following an exposure incident.

All work-related injuries from needle-sticks and cuts, lacerations, punctures and scratches from sharp objects contaminated with another person's blood or other potentially infectious materials are to be recorded on the OSHA 300 as an injury.

a. To protect the employee's privacy, the employees name may not be entered on the OSHA 300.
b. If the employee develops a bloodborne disease, the entry must be updated and recorded as an illness.

Training

All of our first aid providers must have current certificates of first aid and CPR training on file. These records will be maintained by the Plan Administrator.

Initial training, training at the introduction of a new or altered task affecting exposure to bloodborne pathogens or other potentially hazardous materials, and annual training will be provided by a person knowledgeable in the subject matter contained in this Plan.

Training will be interactive between the instructor and employee. An opportunity to ask questions will be provided. Further, this Plan as well as §5193, *Bloodborne Pathogens*, will be readily available for review.

All training will be documented using the forms found in our **Training Information and Documentation Program.** Training documentation will be maintained for a period of three (3) years from the date on which the training occurred.

Training will include, but not be limited to, the following topics and materials:

a. A complete review of our Exposure Control Plan and its accessibility.
b. An accessible copy of §5193 and an explanation of its contents.

c. A general explanation of the epidemiology and symptoms of bloodborne diseases.
d. An explanation of the modes of transmission of bloodborne pathogens.
e. An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials.
f. An explanation of the use and limitations of methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and personal protective equipment.
g. Information on the types, proper use, location, removal, handling, decontamination and disposal of personal protective equipment.
h. An explanation of the basis for selections of personal protective equipment.
i. Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge.
j. Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials.
k. An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available.
l. Information on the post-exposure evaluation and follow-up that is provided after an exposure incident.
m. An explanation of the color coding required by §5193(g)(1).
n. A request for input from employees in the identification, evaluation, and selection of effective engineering and work practice controls.

Note: As a matter of policy, per §1510. Safety Instructions for Employees:

a. When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.

b. The employer will permit only qualified persons to operate equipment and machinery.

c. Where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.

Waste Management

Waste management, if necessary, will comply with State EPA standards regarding handling, storage, and shipping of medical wastes.

Summary

The whole thrust of the exposure control plan for bloodborne pathogens & other infectious material Plan is to provide an awareness of the dangers of bloodborne pathogens, provide a means of reducing the possibility of occupational exposure, and, should occupational exposure occur, provide a means of reducing health risk.

Parking Concepts, Inc

Exposure Determination Form - List I

All job classifications in which all employees have occupational exposure.

1. First Aid Providers
2. _____
3. _____
4. _____
5. _____
6. _____

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Note: The primary job assignment of our designated first aid providers is not the rendering of first aid or other medical assistance. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from job site incidents and only at the location where the incident occurred.

Parking Concepts, Inc

Exposure Determination Form - List II

Job classifications in which some employees have occupational exposure:

1. None
2. _____
3. _____
4. _____
5. _____
6. _____

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Note: The primary job assignment of our designated first aid providers is not the rendering of first aid or other medical assistance. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from job site incidents and only at the location where the incident occurred.

Parking Concepts, Inc

Exposure Determination Form - List III

All tasks and procedures or groups of closely related tasks and procedures in which occupation exposure occurs and are performed by employees in job classifications noted in List II.

	Job Classification	Tasks
1.	None	
2.		
3.		
4.		

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Note: The primary job assignment of our designated first aid providers is not the rendering of first aid or other medical assistance. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from job site incidents and only at the location where the incident occurred.

Parking Concepts, Inc

Housekeeping Schedule & Checklist

SCHEDULE

Following every incident where there is a possibility of the presence of residual bloodborne pathogens or other potentially infectious materials.

CHECKLIST

Only personnel who have had training in our Exposure Control will ensure that all surfaces are decontaminated and that cleaning materials are properly disposed of. Areas to consider include, but are not limited to:

	YES	NA
FLOORS	☐	☐
WALLS	☐	☐
EQUIPMENT	☐	☐
PRODUCT	☐	☐
WASTE CONTAINERS	☐	☐
TOOLS	☐	☐

Broken, potentially infected glassware should be picked up and disposed of using mechanical means such as a brush and dust pan or forceps.

All sharps will be stored in a manner that allows easy access and safe handling.

Infectious waste will be placed in containers that are color coded red. These containers will be decontaminated as soon as practical.

Subsequent to rendering any procedures, employees will ensure that all surfaces on which blood, body fluids, bloodborne pathogens, or other infectious materials may be present are cleaned with an appropriate disinfectant.

Parking Concepts, Inc

Hepatitis B Declination Form

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

_____ _____

(WITNESS) (EMPLOYEES SIGNATURE)

_____

(PRINTED NAME)

_____

(DATE)

Parking Concepts, Inc

Sharps Injury Log

Note: A sharps injury log will be maintained for the recording of percutaneous injuries from contaminated sharps.

The information on the log will be recorded and maintained in such manner as to protect the confidentiality of the injured employee.

This sharps injury log will be maintained for the period of five years.

_____

(Incident Date)

Type and brand of device involved in the incident:

_____

Work area where the exposure incident occurred:

_____

Explanation of how the incident occurred:

_____

_____

_____

_____

_____

_____

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_____

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_____

_____

_____

Zoe Robinette

Injury and Illness Prevention Program Administrator

Parking Concepts, Inc

Annual Exposure Control Plan Review

This Exposure Control Plan was prepared:

At least annually, this program will be reviewed and, if necessary, updated to reflect innovations in procedures and technological developments that eliminates or reduces exposure to bloodborne pathogens.

As part of the annual review, the below will be considered:

a. Employee Input
b. Sharps Injury Log
c. Exposure Incident Reports
d. Professional Journals

Date Reviewed:	Signature	Title
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Parking Concepts, Inc

Exposure Incident Report

ALL INFORMATION ON THIS FORM IS TO REMAIN CONFIDENTIAL

THIS FORM WILL BE COMPLETED AS SOON AS FEASIBLE AFTER AN EXPOSURE INCIDENT BUT, UNDER NO CIRCUMSTANCES, AFTER THE SHIFT ON WHICH THE INCIDENT OCCURRED.

DATE: _____ TIME: _____

NAME OF EMPLOYEE: _____

ROUTE OF EXPOSURE: _____

SOURCE INDIVIDUAL'S NAME: _____

a. Above individual did / did not consent to be tested for HBV or HIV.

b. Testing was done by: _____

1. Results: _____

EMPLOYEE WAS OFFERED AND ACCEPTED:	**NO**	**YES**	
a. Hepatitis Vaccination Series. [Date(s)]	☐	☐	_____
1. If "NO", written declination was signed.			
b. Post Exposure Evaluation and follow-up.	☐	☐	
c. Employee consents to baseline blood collection.	☐	☐	_____ (Signature)

Description of events leading to this exposure incident:

_____

_____

_____

_____

Corrective Measures to Prevent a Reoccurrence:

_____

_____

_____

_____

_____ _____

Zoe Robinette (Employee Signature)

(Exposure Control Plan Administrator Signature)

§1670. Personal Fall Arrest Systems, Personal Fall Restraint Systems and Positioning Devices
§1671.1. Fall Protection Plan
§1724. Roofing--General
§1730. Roof Hazards

Prompt Rescue Policy Statement

Compliance with 29 CFR 1926.502(d)(20)

29 CFR 1926.502(d)(20) states: “The employer will provide for prompt rescue of employees in the event of a fall or will assure that employees are able to rescue themselves.”

Per OSHA interpretation letters [J. Nigel Ellis (May 11, 1999) & Charles Hill (August 14, 2000)], the hazard being addressed by 29 CFR 1926.502(d)(20) is being suspended by the fall arrest system after an arrested fall.

Prompt rescue is not defined, but it does imply that rescue be performed quickly – in time to prevent serious injury to the suspended worker.

As a matter of policy, under no circumstances will our employees attempt to perform a self-rescue.

The rationale for this policy is as follows:

a. Expecting a suspended employee to perform self-rescue presupposes that the employee is:
    1. Of clear mind after the fall, and
    2. In excellent physical condition, and
    3. Has not sustained any injuries from the fall arrest, and
    4. Did not have a medical event that caused the fall in the first place (fainting, for example).
b. Because our employees are not professional rescue persons, in depth self-rescue training would be required and practice self-rescue exercises performed for each possible combination of fall scenarios.
c. Specialize self-rescue equipment and training on that equipment would be required.
d. Self-rescue is not required by 29 CFR 1926.502(d)(20).

Prompt Rescue Procedures:

As a matter of policy, an employee performing work requiring a personal fall arrest system **will not work alone**. He/she will be in sight of another employee using a personal fall arrest system or be monitored by a safety monitor whose sole job will be to ensure there is not a fall event that goes unnoticed.

Prior to performing work requiring a personal fall arrest system, Zoe Robinette our Injury and Illness Prevention Program Administrator, or designated competent person, will:

a. Assess the possible fall scenarios, and
b. Take inventory of in-house equipment that is readily available for possible rescue (ladders, forklifts, mobile scaffold, etc.), and
c. Be prepared to implement a plan of action utilizing our in-house equipment should a fall occur, **or**
d. Call an emergency rescue service and give them:
    1. Our exact location.
    2. A quick synopsis of what happened.
    3. The height of the suspended person.
    4. Known or suspected injuries.

_____

Zoe Robinette

Safety Director

Overview

One of the most serious hazards faced by our employees is falls from heights. Our Fall Protection Program has been developed to prevent injury from falls from a walking/working surface to a lower level, to prevent objects falling from above and striking persons below, and to prevent job site persons from falling into holes. Different types of work activities require different levels of fall protection. If an employee is not sure of proper fall protection to utilize in a specific work situation, he/she must ask a supervisor or competent person for the proper fall protection requirements before performing work.

Within the context of this program, the term “fall hazard” does not refer to falling off a ladder or scaffold. Scaffold and ladder safety is addressed within its own program.

A copy of our Fall Protection **Program** can be found readily accessible to our employees on appropriate job sites.

A copy of our Fall Protection **Plan** will be found on every applicable job site.

On all job sites where fall hazards exist, there will be at least one competent person who has the training and ability to identify fall hazards and the authority to ensure that proper fall protection systems are properly implemented.

The following areas of concern are addressed by this Program:

a. The need to know where fall protection is required.
b. Selection of fall protection systems which are appropriate for given situations.
c. Construction and installation of safety systems.
d. Supervision of employees.
e. Implementation of safe work procedures.
f. Training in selection, use, and maintenance of fall protection systems.

Our Fall Protection Program may be reviewed at any time by our employees. Should a question arise concerning this Program, personnel are encouraged to consult with their supervisor or Zoe Robinette, our Fall Protection Program Administrator.

Duties of the Program Administrator or Designated Personnel

The duties of Program and/or Designated Personnel include:

a. Training of personnel.
b. Maintenance of training records – through PayCom
c. Random, unannounced job site inspections to assure compliance with both OSHA standards and company safety policies.
d. Resolution of specific problems that may present themselves regarding a particular job site situation.
e. Designating a competent (by training or experience) person at each applicable job site who will ensure:
    1. A copy of our fall protection program/plan is readily accessible on appropriate job sites.
    2. Subcontractors with whom we may work are appropriately trained in fall protection.

3. A written certification record has been prepared documenting that employees who have potential exposure to fall hazards at the job site have received the required training in protection.
4. The fall protection system(s) utilized at the job site are appropriate for the hazard(s) present.
5. That, before any work is initiated, the walking/working surfaces at the job site are capable of supporting both our personnel and equipment.

Program Administrator will be familiar with all applicable standards and will keep up to date of developments in the field of fall protection.

Pre-Project Planning

Fall protection requires a joint effort by our personnel, and the specialty subcontractors who may be working with us, to identify work situations in which fall hazards exist, determine the most appropriate fall protection system to be utilized, and to ensure that all persons understand the proper methods of utilizing the selected fall protection systems. A pre-construction survey by a competent person will often provide the information needed to make these determinations.

Fall protection system requirements may change during a project and the competent person on site will ensure that fall protection is maintained at all times. Care will be taken to assure that load limits are not exceeded on walking/working surfaces and attachment points and hardware is capable of withstanding (with the appropriate safety factor) the potential forces that may be generated during an actual fall incident.

Fall protection hardware and equipment owned, rented, or leased will be NIOSH/ANSI approved and it is assumed that the manufacturer's technical specifications and capabilities are accurate.

From the very inception of a potential project (pre-bid) to completion, fall protection needs and costs will be factored in.

Definitions

There are a number of terms and phrases, not common in everyday life, which must be understood to grasp the thrust of this Fall Protection Program. For those employees directly involved with this Program or affected by it, there are specific requirements and procedures which would be meaningless without an understanding of the "language" of our Fall Protection Program.

Note: Words used within the definitions which are themselves defined are printed in bold italic.

Anchorage means a secure point of attachment for *lifelines*, *lanyards* or *deceleration devices*.

Body Harness means straps which may be secured about the employee in a manner that will distribute the fall arrest over at least the thighs, pelvis, waist, chest, and shoulders with means for attaching it to other components of a *personal fall arrest system*.

Buckle means any device for holding the *body harness* closed around the employee's body.

Carabiner means an oval metal ring with a snap link used to fasten a rope to the piton [a spike (attachment) with an eye to which a rope can be secured.]

CFR means code of Federal Regulations.

Competent Person means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees; and who has authorization to take prompt corrective measures to eliminate them.

Connector means a device which is used to couple (connect) parts of the *personal fall arrest system* and *positioning device systems* together. It may be an independent component of the system, such as a *carabineer*, or it may be an integral component of part of the system (such as a *buckle* or d-ring sewn into a self-retracting *lanyard*).

Controlled Access Zone (CAZ) means an area in which certain work (e.g., *overhand bricklaying*) may take place without the use of *guardrail systems*, *personal fall arrest systems*, or safety net systems; access to the zone is controlled.

Dangerous Equipment means equipment (such as pickling or galvanizing tanks, degreasing units, machinery, electrical equipment, and other units) which, as a result of form or function, may be hazardous to employees who fall onto or into such equipment.

Deceleration Device means any mechanism, such as a *rope grab*, rip-stitch *lanyard*, specially-woven *lanyard*, tearing or deforming *lanyards*, automatic self-retracting *lifelines*/*lanyards*, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

Deceleration Distance means the additional vertical distance a falling employee travels from the point at which the *deceleration device* begins to operate before stopping, excluding *lifeline* elongation and *free fall distance*. It is measured as the distance between the location of an employee's *body harness* attachment point at the moment of activation (at the onset of fall arrest forces) of the *deceleration device* during a fall, and the location of that attachment point after the employee comes to a full stop.

Equivalent means alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

Failure means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

Free Fall means the act of falling before a *personal fall arrest system* begins to apply force to arrest the fall.

Free Fall Distance means the vertical displacement of the fall arrest attachment point on the employee's *body harness* between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes *deceleration distance*, and *lifeline*/*lanyard* elongation, but includes any *deceleration device* slide distance of *self-retracting lifeline/lanyard* extension before they operate & fall arrest forces occur.

Guardrail System means a barrier erected to prevent employees from falling to *lower levels*.

Hole means a gap or void 2 inches (5.1 cm) or more in its least dimension, in a floor, *roof*, or other *walking/working surface*.

Infeasible means it is impossible to perform the construction work using a conventional fall protection system (i.e., *guardrail system*, safety net system, or *personal fall arrest system*) or that it is technologically impossible to use any one of these systems to provide fall protection.

Lanyard means a flexible line of rope, wire rope, or strap which generally has a *connector* at each end for connecting the *body harness* to a *deceleration device*, *lifeline*, or *anchorage*.

Leading Edge means the edge of a floor, *roof*, or formwork for a floor or other *walking/working surface* (such as the deck) which changes location as additional floor, *roof*, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

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

Low-Slope Roof means a *roof* having a slope less than or equal to 4 in 12 (vertical to horizontal).

Lower-Levels means those areas or surfaces to which an employee can fall. Such areas or surfaces to include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

Mechanical Equipment means all motor or human propelled wheeled equipment used for *roofing work*, except wheelbarrows and mop carts.

Opening means a gap or void 30 inches or more high and 18 inches or more wide, in a wall or partition through which employees can fall to a *lower level*.

Overhand Bricklaying and Related Work means the process of laying bricks and masonry units such that the surface of the wall to be jointed is on the opposite side of the wall from the mason, requiring the mason to lean over the wall to complete the work. Related work includes mason tending and electrical installation incorporated into the brick wall during the overhand bricklaying process.

Personal Fall Arrest System means a system used to arrest an employee in a fall from a working level. It consists of an *anchorage*, *connectors*, a *body harness,* and may include a *lanyard*, *deceleration device*, *lifeline*, or suitable combination of these. The use of body belts for fall arrest is prohibited.

Positioning Device System means a *body belt* or *body harness* system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

Qualified Person means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

Rope Grab means a *deceleration device* which travels on a *lifeline* and automatically, by friction, engages the *lifeline* and locks so as to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

Roof means the exterior surface on the top of a building. This does not include floors or formworks which, because a building has not been completed, temporarily become the top surface of a building.

Roofing Work means the hoisting, storage, application, and removal of roofing materials and equipment, including related insulation, sheet metal, and vapor barrier work, but not including the construction of the *roof* deck.

Safety-Monitoring System means a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

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

Snaphook means a *connector* comprised of a hook-shaped member with a normally closed keeper of similar arrangement which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types:

a. The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or
b. The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. The use of a non-locking snaphook as part of ***personal fall arrest systems*** and ***positioning device systems*** is prohibited.

Steep Roof means a ***roof*** having a slope greater than 4 in 12 (vertical to horizontal).

Toeboards means a low protective barrier that will prevent the fall of material and equipment to ***lower levels*** and provide protection from falls for personnel.

Unprotected Sides and Edges means any side or edge (except at entrances to points of access) of a ***walking/working surface***, e.g., floor, ***roof***, ramp, or runway where there is no wall or ***guardrail system*** at least 39 inches high.

Walking/Working Surfaces means any surface, whether horizontal or vertical, on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runway, formwork and concrete reinforcing steel; not including ladders, vehicles, or trailers on which employees must be located in order to perform their job duties.

Warning Line System means a barrier erected on a ***roof*** to warn employees that they are approaching an unprotected ***roof*** side or edge, and which designates an area in which ***roofing work*** may take place **without** the use of a guardrail, ***body belt***, or safety net systems to protect employees in the area.

Work Area means that portion of a ***walking/working surface*** where job duties are being performed.

Where Fall Protection is Required

The "key" distance is 7½ feet. All employees must be aware that if there is a possibility of falling 7½ feet or more, in most situations, at least one (1) fall protection system will be implemented. Further, protection from being struck by falling objects from above will be provided on all job sites.

Many areas are included because, over time, most of these areas will present themselves on job sites even if the exposures are the result of another contractor's work.

Below listed are specific situations where fall protection systems will be utilized.

Unprotected Sides and Edges:

Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge, which is 7½ feet or more above a lower level, will be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

Leading Edges:

Each employee who is constructing a leading edge 7½ feet or more above lower levels will be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems.

Hoist Areas:

Each employee in a hoist area will be protected from falling 7½ feet or more to lower levels by guardrail systems or personal fall arrest systems.

If a guardrail system is utilized in a hoist area and portions of the system are removed to facilitate the hoisting operation, and an employee must lean through the access opening or out over the edge of the access opening, that employee must be protected by a fall arrest system.

Holes:

Each employee on walking/working surfaces will be protected from falling through holes (including skylights) more than 6 feet above lower levels by personal fall arrest systems, covers, or guardrail systems.

a. Each employee on a walking/working surface will be protected from tripping in or stepping into or through holes (including skylights) **(regardless of height)** by covers.
b. Each employee on a walking/working surface will be protected from objects falling through holes **(regardless of height)** by covers.

Formwork and Reinforcing Steel:

Each employee on the face of formwork or reinforcing steel will be protected from falling 6 feet or more to lower levels by personal fall arrest systems, safety net systems, or positioning device systems.

Ramps, Runways, and other Walkways:

Each employee on ramps, runways, and other walkways will be protected from falling 7½ feet or more to lower levels by guardrail systems.

Excavations:

Each employee at the edge of an excavation 7½ feet or more in depth will be protected from falling by guardrail systems, fences, or barricades when the excavations are not readily seen because of plant growth or other visual barriers.

Further, each employee at the edge of a well, pit, shaft, and similar excavation 6 feet or more in depth will be protected from falling by guardrail systems, fences, barricades, or covers.

Dangerous Equipment:

Each employee less than 6 feet above dangerous equipment will be protected from falling into or onto the dangerous equipment by guardrail systems or by equipment guards. Each employee 6 feet or more above dangerous equipment will be protected from fall hazards by guardrail systems, personal fall arrest systems, or safety net systems.

Rebar:

Employees are not to place or tie reinforcing steel in walls, piers, columns, etc., more than 6 feet above an adjacent surface unless a personal fall protection system is used or other method affording equivalent protection from the hazard of falls from elevated surfaces is employed. Employees who work above grade or above any surface and who are exposed to protruding rebar or similar projections must be protected from impalement by:

a. The use of guardrails, or
b. Approved fall protection systems, or
c. Approved troughs and covers.

Exception: Point-to-point horizontal or vertical travel on reinforcing steel up to 24 feet above the surface below providing there are no impalement hazards.

Roofing Work on Low-Sloped Roofs:

Because the height from which an employee may fall to a lower level varies from zero feet to 20 feet during roofing operations, Cal/OSHA Standard §1730, Roof Hazards, is copied below:

§1730. Roof Hazards.

a. During roofing operations, the employer will comply with the provisions of Section 1509 and employees will be trained and instructed in accordance with the provisions of Section 1510 of these orders.
b. Slopes 0:12 to 4:12 -Single-Unit (Monolithic) Roof Coverings.
    1. Employees will be protected from falls from roofs of a height of more than 20 feet by use of one or a combination of the methods in this section. Whenever felt laying machines or other equipment that is pulled by an operator who walks backwards is being used, this provision will apply regardless of the height.
    2. Warning lines consisting of rope, wire or similar material, flagged with highly visible material hanging from the warning lines at approximately 6-foot intervals, will be installed 34 to 45 inches above the roof surface to warn employees that they are approaching the edge of the roof.
        i. The stanchions (portable or fixed) supporting the warning lines will be designed and installed to minimize tip over or displacement under normal working conditions.
        ii. Warning lines will have a minimum tensile strength of 500 pounds.
        iii. The line will be attached at each stanchion in such a way that pulling on one section of the line between stanchions will not result in slack being taken up in adjacent sections before the stanchion tips over.
    3. Unless conditions prohibit, headers consisting of sheets of roofing or other roofing materials will also be laid parallel to the edges of the roof to warn employees that they are approaching the edge of the roof.
    4. The warning lines and headers will be placed no closer than 5 feet from the roof edge.

5. When using felt-laying machines or other equipment that is pulled by an operator who walks backwards or motorized equipment on which the operator rides, the headers will be placed no closer than 10 feet and the warning lines will be placed no closer than 5 feet from those roof edges that are perpendicular (or nearly so) to the direction in which the operator is moving and when conditions prohibit the use of headers, the warning lines will be placed no closer than 10 feet from those roof edges that are perpendicular (or nearly so) to the direction in which the operator is moving.
6. The warning lines and headers will be erected either around the complete perimeter of the roof or only in areas of the roof where work is being accomplished, so long as the warning lines and headers are moved as the work progresses in such a manner as to provide continuous warning to employees in the work area when they approach the roof edge. Access paths will be erected as follows:
    i. Points of access, materials handling areas and storage areas will be connected to the work area by a clear access path formed by two warning lines.
    ii. When the path to a point of access is not in use, a rope, wire, or chain, equal in strength and height to the warning line, will be placed across the path at the point where the path intersects the warning line erected around the work area.
7. Employees will be instructed to stay inside the warning lines and headers except when work must be performed at the roof edge.
8. Application of materials outside the warning lines will be closely supervised by a qualified person.
9. On narrow roofs and roofs of unusual shape where warning lines and headers would be impractical, the application of materials will be closely supervised by a qualified person.
10. When a felt-laying machine or any other equipment that is pulled by an operator who walks backwards is being used, the operator will be no closer than 3 feet to the roof edges that are parallel (or nearly so) to the direction in which the operator is moving. Motorized equipment on which the operator rides will not be used or stored between the warning line and the roof edge.

Note: The provisions of subsection (b) do not apply when employees are protected by the use of one or a combination of the following methods:

Personal Fall Protection [Section 1724(f)].

Catch Platforms [Section 1724(c)].

Scaffold Platforms [Section 1724(d)].

Eave Barriers [Section 1724(e)].

Standard Railings and Toeboards (Article 16).

Parapets at least 24 inches high; except that at those job sites where felt-laying machines or other equipment that is pulled by an operator who walks backwards or motorized equipment on which the operator rides is being used, the provisions of this subsection will not apply provided that the parapet is 36 inches or more in height at those roof edges which are perpendicular (or nearly so) to the direction in which the equipment is moving.

c. Slopes Greater Than 4:12 -Single-Unit (Monolithic) Roof Coverings. Employees will be protected from falls from roofs of a height of more than 20 feet by use of one or a combination of the following methods:
    1. Parapets, 24 inches or higher.
    2. Personal Fall Protection [Section 1724(f)].
    3. Catch Platforms [Section 1724(c)].
    4. Scaffold Platforms [Section 1724(d)].
    5. Eave Barriers [Section 1724(e)].
    6. Standard Railings and Toeboards (Article 16).

Note: The provisions of this subsection (c) do not apply under the following conditions:

At those job sites where motorized equipment on which the operator rides which has been designed for use on roofs of slopes greater than 4:12 is being used if the parapet is 36 inches or more in height at those roof edges which are perpendicular (or nearly so) to the direction in which the equipment is moving.

d. Equipment Hazards on Sloped Roofs -Single-Unit (monolithic) Roof Coverings. Equipment that is pulled by an operator who walks backwards will not be used on a roof having a slope greater than 4:12.

e. Slopes 0:12 Through 5:12 -Multiple-Unit Roof Coverings. Employees will be protected from falls from roofs that are of a height of more than 20 feet by the use of a roof jack system as provided in Section 1724(a), a minimum of 24- inch high parapet, or other method affording equivalent protection.

f. Slopes Greater Than 5:12 -Multiple-Unit Roof Coverings. Employees will be protected from falls from roofs that are of a height of more than 20 feet by one or a combination of the following methods:
    1. A parapet at least 24 inches high.
    2. Personal Fall Protection [Section 1724(f)].
    3. Catch Platforms [Section 1724(c)].
    4. Scaffold Platforms [Section 1724(d)].
    5. (5) Eave Barriers [Section 1724(e)].
    6. Roof Jack Systems [Section 1724(a)] (Safety lines will be required in conjunction with roof jack systems on roofs steeper than 7:12)

Note: For purposes of Section 1730, the height measurement will be determined by measuring the vertical distance from the lowest edge of the roof or eaves to the ground or level below. The height of parapets will not be included in the roof height measurements.

Exception to Section 1730: Section 1731 applies instead of Section 1730 for roofing work on new production-type residential construction with roof slopes 3:12 or greater.

Each employee engaged in roofing activities on low-sloped roofs with unprotected sides and edges 6 feet or more above lower levels will be protected from falling by guardrail systems, safety net systems, personal fall arrest systems or a combination of a warning line system and a safety net system or a warning line system and a safety monitoring system.

Note: On roofs 50 feet or less in width, the use of a safety monitoring system alone (without the warning line system) is permitted.

Steep Roof:

Each employee on a steep roof with unprotected sides and edges 7½ feet or more above lower levels will be protected from falling by guardrail systems with toeboards, safety net systems, or personal fall arrest systems.

Note: Fall protection is required at any height when working:

a. **On roofs having a pitch of 4:12 or greater, while workers use pneumatic nailers.**

b. **On roofs, while an operator uses a felt-laying machine or other equipment that requires the operator to walk back-wards.**

Precast Concrete Erection:

Each employee, engaged in the erection of precast concrete members (including, but not limited to the erection of wall panels, columns, beams, and floor and roof "tee") and related operations such as grouting of precast concrete members, who is 6 feet or more above lower levels will be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems.

Steel Erection (IRON WORK):

Note: A qualified person will provide fall hazard training as it relates to steel erection and instruction will cover the following topics:

a. **The recognition and identification of fall hazards in the work area;**

b. **The use and operation of guardrail systems (including perimeter safety cable systems), personal fall arrest systems, positioning device systems, fall restraint systems, safety net systems, and other protection to be used;**

c. **The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used;**

d. **The procedures to be followed to prevent falls to lower levels and through or into holes and openings in walking/working surfaces and walls; and**

e. **The fall protection requirements for structural steel erection.**

A PFP system must be used if guard rails or safety nets are not installed if working 15 feet or more above a lower level, except as noted below.

Connecting:

When connecting beams or other structural members at the periphery or interior of a building or structure where the fall distance is greater than two stories or 30 feet, whichever is less, iron workers will be provided with and use a personal fall protection system tied-off to either columns, pendant lines secured at the tops of columns, catenary lines, or other secure anchorage points.

At heights over 15 and up to 30 feet above a lower level, connectors will be provided with a personal fall arrest system, positioning device system or fall restraint system and wear the equipment necessary to be able to be tied off; or be provided with other means of protection from fall hazards.

Structural Wood Framing Systems:

When working on structural wood framing systems and during framing activities on wood or light gauge steel frame residential/light commercial construction 15 or more feet above a lower level, a PFP system must be used if guard rails or safety nets are not installed.

Exception: For residential/light commercial frame construction, workers are considered protected when working on braced joists, rafters or roof trusses spaced on 24 inch (or less) centers when they work more than 6 feet from unprotected sides or edges.

Wall Openings:

Each employee working on, at, above, or near wall openings from which there is a drop of more than 4 feet, and the bottom of the opening is less than 3 feet above the working surface, will be guarded as follows:

a. When the height and placement of the opening in relation to the working surface is such that either a standard rail or intermediate rail will effectively reduce the danger of falling, one or both will be provided;
b. The bottom of a wall opening, which is less than 4 inches above the working surface, regardless of width, will be protected by a standard toeboard or an enclosing screen. A toeboard is not required when a chute is attached to the opening.

Walking/Working Surfaces not Otherwise Addressed:

Each employee on a walking/working surface 7½ feet or more above a lower level that is not addressed will be protected from falling by a guardrail system, a safety net system, or a personal fall arrest system.

Note: On multi-employer work sites, employees of all contractors and subcontractors must understand the fall protection hazards that exist and be aware of the various methods of fall protection even if they are NOT directly exposed to fall hazards in their particular work area. For example, a contractor may have a controlled access zone in place and all persons on the job site, regardless of their employer, must understand the importance of remaining outside that CAZ.

Pre-Construction Survey

Prior to the initiation of any construction project, the job site will be surveyed by a competent/qualified person to determine:

a. If fall protection systems will be required.
b. If fall hazards exist, the types of conventional fall protection systems to be utilized.
    1. Particular attention will be given to anchorage points, location of warning lines, etc.
c. Rescue procedures to be used if a fall actually occurs.
d. The load-carrying capabilities of the walking/working surface.
e. Assuring that all personnel utilizing a fall protection system have training in that system.

This survey may be made without the use of fall protection because no work will be accomplished during this survey and installing fall protection systems would create a greater hazard.

If it is determined that certain areas within the overall worksite have fall hazards that cannot be addressed with conventional fall protection systems (those areas being limited to leading edge work, residential construction work, and precast concrete work), **then** a Fall Protection Plan must be prepared to specifically protect employees from these hazards.

Guardrail System:

A guardrail system is a physical barrier erected to prevent employees from falling to lower levels.

The main advantage of a guardrail system is that it is a “passive” system which, once installed, requires no employee involvement in its function. A guardrail will stop an employee who inadvertently walks into it.

Guardrail Systems at Hoisting Areas:

When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section will be placed across the access opening between the guardrail sections when hoisting operations are not taking place.

Note: If a portion of the guardrail system is removed at a hoisting area to facilitate the hoisting operations and an employee must lean out over the opening, then that employee must be protected by a personal fall arrest system. In this instance it is important to remember that the personal fall arrest system may not be attached to the guardrail system.

Guardrail Systems at Holes:

Guardrail systems used at holes will be erected on all unprotected sides of the edges of the hole.

When the hole is to be used for the passage of materials, the hole will not have more than two sides provided with removable guardrail sections to allow the passage of materials. When the hole is not in use, it will be closed over with a cover **or** protected with a guardrail system on all unprotected sides or edges.

Note: Guardrails need not be erected around holes while employees are working at the hole, passing materials through the hole, etc. When work is completed around the hole, the hole must be protected by guardrails on all sides of the hole or by covers.

Guardrail systems used around holes which are used as points of access (such as ladder ways) will be provided with a gate or be offset so that a person cannot walk directly into the hole.

Guardrail Systems on Ramps and Runways:

Guardrail systems used on ramps and runways will be erected along each unprotected side or edge. Ramps, runways, and other walkways on which employees need protection from falling 7½ feet or more to a lower level must be protected by a guardrail system and only a guardrail system.

Personal Fall Arrest System:

A personal fall arrest system is, as the name implies, a means of safely decelerating a falling body before a lower level is hit. The three (3) main components of a personal fall arrest system are the:

a. Anchorage point
b. Lanyard
c. Body harness

Note: Body belts will not be used in a personal fall arrest system.

The tie-off attachment point must be at or above the connection point on the harness to prevent additional free fall distance.

As are guardrails, personal fall arrest systems are “passive” and require no employee involvement once they are properly rigged.

For all practical purposes, d-rings and locking type snaphooks will have a minimum tensile strength of 5,000 pounds and lanyards and vertical lifelines will have a minimum breaking strength of 5,000 pounds. Anchorages must be capable of supporting 5,000 per employee.

Anchorages used in personal fall arrest systems must be independent of any anchorage being used to support or suspend platforms.

Note: Knots in a rope lanyard or lifeline can reduce its strength by as much as 50% and having a lanyard go over or around sharp edges can completely destroy its effectiveness.

With the exception that harnesses, and components may be used as positioning device systems, personal fall arrest system components may not be used for purposes other than that for which they were designed.

Positioning device system components will be inspected prior to each use for wear, damage, and other deterioration and defective components will be removed from service.

Should a personal fall arrest system actually be used to stop a fall, it will be removed from service and not used again until inspected and determined to be undamaged and suitable for reuse by a competent person.

Safety Net Systems:

Safety nets will be installed as close as practicable under the walking/ working surface on which employees are working.

Where the elevation is 25 feet or more above the ground, water surface, or continuous floor level below, and when the use of personal fall arrest systems, personal fall restraint systems, positioning device systems or more conventional types of protection are clearly impractical, the exterior and/or interior perimeter of the structure will be provided with an approved safety net extending at least 8 feet horizontally from such perimeter and being positioned at a distance not to exceed 10 feet vertically below where such hazards exist, or equivalent protection provided safety nets will extend outward from the outermost projection of the work surface as follows:

Vertical distance from working level to horizontal plane of net.	Minimum required horizontal distance of outer edge of net from the edge of working surface
Up to 5 feet More than 5 feet up to 10 feet More than 10 feet but not to exceed 30 feet.	8 feet 10 feet 13 feet

Nets will be hung with sufficient clearance to prevent user's contact with the surfaces or structures below. Such clearances will be determined by impact load testing.

Safety Net Labeling:

Safety nets purchased on or after January 1, 1998 will be labeled as meeting the requirements of ANSI A10.11-1989. Safety nets purchased before January 1, 1998 will be labeled as meeting the requirements of ANSI A10.11-1979 or ANSI A10.11-1989.

Warning Line System:

A warning line system is a barrier erected on a roof to warn employees that they are approaching an unprotected roof side or edge, and which designates an area in which roofing work may take place without the use of guardrail, body harness, or safety net systems to protect employees in the area.

A warning line system is to be used only during roofing work on low-sloped roofs over 50-feet in width with unprotected sides and edges 6-feet or more above lower levels (on a simple rectangular roof, width is the lesser of the two primary overall dimensions. This is also the case with roofs which are sloped toward or away from the roof center). Most importantly, warning line systems must be used in conjunction with either a guardrail system, a safety net system, a personal fall arrest system, or a safety monitoring system.

Note: In the above scenario, either a guardrail system, a safety net system, or a personal fall arrest system alone provides adequate fall protection.

As a general rule, warning line systems will be used in conjunction with a safety monitoring system.

A warning line made of ropes, wires, chains, and supporting stanchions will be flagged at no more than 6-feet intervals with high-visibility material. As the name implies, this line will only “warn” employees that they are approaching an unprotected side or edge. The horizontal resisting force of a warning line is 16 pounds versus 200 pounds for a guardrail system.

No personnel are allowed in the area between a roof edge and a warning line unless they are performing roofing work in that area.

Mechanical equipment on roofs will only be used in areas that are protected by either a warning line system, a guardrail system, or a personal fall arrest system.

The warning line will be erected around all sides of the roof work area not less than 6-feet from the roof edge unless mechanical equipment is being used. In that case, the warning line will be erected not less than 6-feet from the roof edge which parallels the mechanical operation and not less than 10 feet from the roof edge which is perpendicular to the direction of the mechanical operation.

Points of access, material handling areas, storage areas, and hoisting areas will be connected to the work area by an access path formed by two warning lines. When the aforementioned areas are not in use, the warning line will be adjusted to completely seal off the work area so that a person cannot inadvertently enter the area.

Safety Monitoring System:

A safety monitoring system used in conjunction with a warning line system is not considered a “passive system” because it takes active employee involvement and, as such, both the Safety Monitor and the employee(s) being monitored must be alert for fall hazards.

A competent person will perform the duties of Safety Monitor. These duties include:

a. Recognizing fall hazards,
b. Warning the employee when it appears the employee is unaware of a fall hazard or is acting in an unsafe manner,
c. Remaining on the same walking/working surface and within visual sighting of the employee being monitored, and
d. Remaining close enough to communicate orally with the employee being monitored.

The Safety Monitor will have no other responsibilities which could take the monitor’s attention from the monitoring function.

Only the employee engaged in roofing work on low-sloped roofs or an employee covered by a fall protection plan [29 CFR 1926.502(k)] is allowed in the area being protected by the Safety Monitor.

When a safety monitoring system is being used, mechanical equipment will not be used or stored in that controlled zone.

Of course, the employee being monitored is required to comply promptly with the fall hazard warnings from the Safety Monitor.

Positioning Device System:

A positioning device system consists of a body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning. It is used during formwork and steel reinforcing.

Positioning device systems must be inspected prior to each use for wear, damage, and other deterioration. Defective components must be removed from service. Components of positioning device systems must never be used for purposes other than that for which they were designed -- specifically fall protection and/or positioning on a vertical surface.

Controlled Access Zone (CAZ):

A controlled access zone is an area in which certain work activity may take place without the use of guardrail systems, personal fall arrest systems, or safety net systems and access to the zone is controlled.

Specific controlled access zone criteria are found in 29 CFR 1926.502(g). A controlled access zone will be created when appropriate.

Controlled access zones will only be used as part of a fall protection plan (reference 29 CFR 1926.502(k) and Fall Protection Plan, below) or when an employee is performing overhand bricklaying and related work. Persons performing overhand bricklaying or related work that requires reaching more than 10 inches below the walking/working surface may not be afforded fall protection by working in a controlled access zone.

Controlled access zones are work areas that have limited access to only authorized personnel by means of control lines or other means that restrict access.

Covers:

Covers can prevent an employee from stepping into a hole, tripping over a hole, falling through a hole, or being injured by objects falling through a hole.

Note: When work is completed around a hole, the hole must be protected by guardrails on all sides of the hole or by covers.

Covers must be capable of supporting, without failure, twice the weight of the employees, equipment, and/or materials that may be imposed upon them.

Covers, when used, must be secured to prevent accidental displacement by wind, equipment, or employees.

All covers must be color coded or marked with the word: “HOLE” or “COVER” to identify the hazard.

Note: The above does not apply to cast iron manhole covers or roadway steel grates.

Covers, and only covers, will be used on walking/working surfaces to protect employees from tripping or stepping into or through a hole (including skylights). This provision is **regardless of the height** of the hole above a lower surface.

Covers, and only covers, will be used to protect employees from objects falling through holes (including skylights). This provision is **regardless of the height** of the hole above a lower surface.

Projection from Falling Objects:

Specific protection from falling objects criteria are found in 29 CFR 1926.502(j) and we will use that criteria to protect our employees from falling objects.

Covers are to be used to protect employees from objects falling through holes (including skylights) from upper surfaces regardless of heights.

Toeboards, used to prevent objects from falling on employees on a lower level must be at least 3½ inches high with not more than a ¼ inch clearance between the toeboard and the walking/working surface. When tools, materials, or equipment are piled higher than the top edge of the toeboard, paneling or screening will be erected from the top of the toeboard to the appropriate mid or top rail of the guardrail system to provide adequate protection to employees below.

Fall Protection Plan

The foregoing Fall Protection Program is not a Fall Protection Plan per se. However, implementing the preceding guidelines for conventional fall protection systems coupled with certified formal and hands-on training will provide appropriate fall protection for our employees.

There may be occasions where conventional fall protection systems just will not work.

When it can be shown that the use of conventional fall protection is impractical or creates a greater hazard, a fall protection plan will be prepared by a qualified person and developed specifically for the site where the construction work is being performed.. A qualified person is one who by reason of training, experience or instruction has demonstrated the ability to safely perform all assigned duties.

The plan must be maintained up to date. Only a single site fall protection plan needs to be developed for sites where the construction operations are essentially identical.

The identity of the qualified person will be documented.

A copy of the fall protection plan with all approved changes will be maintained at the job site.

The fall protection plan will document the reasons why the use of conventional fall protection systems (guardrails, personal fall arrest systems, or safety nets) are infeasible or why their use would create a greater hazard.

The fall protection plan will include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard for workers who cannot be provided with protection provided by conventional fall protection systems. For example, the employer will discuss the extent to which scaffolds, ladders, or vehicle mounted work platforms can be used to provide a safer working surface and thereby reduce the hazard of falling.

The fall protection plan will identify each location where conventional fall protection methods cannot be used. These locations will then be classified as controlled access zones.

Where no other alternative measure (i.e. scaffolds, ladders, vehicle mounted work platforms, etc.) has been implemented, the employer will implement a safety monitoring system.

The fall protection plan must include a statement which provides the name of each employee who is designated to work in controlled access zone. No other employees may enter controlled access zones.

In the event an employee falls, or some other related, serious incident occurs (e.g., a near miss), the employer will investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g., new practices, procedures, or training) and will implement those changes to prevent similar types of falls or incidents.

Accidents and Near Accidents

Accidents and near accidents involving fall hazards will be investigated by Zoe Robinette to determine the cause of the incident and a method of preventing a reoccurrence. Questions to be considered are:

a. Was the fall protection system selected appropriate for the hazard?
b. Was the system properly installed?
c. Was the person involved in the accident following proper procedures?
d. Were there contributing factors such as ice, wind, debris, etc.?
e. Is retraining or a change of the Fall Protection Plan required?

Training/Retraining

Training, which must be certified, will include the following topics:

a. The nature of fall hazards in the work area.
b. The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection to be used.
c. The use and operation of guardrail systems, personal fall arrest systems, safety net systems' warning line systems, safety monitoring systems', controlled access zones, and other protection to be used.
d. The role of the Safety Monitor and the role of the employee when a safety monitoring system is used.
e. The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs.
f. The correct procedures for handling and storage of equipment and materials and the erection of overhead protection.
g. The role of employees in fall protection plans.

Training will be conducted by competent person(s) using the below listed items as resource materials:

a. This Fall Protection Program.
b. The manufacturer's instruction manuals that come with fall protection equipment.
c. The competent person's work experiences.

Should the competent person, a supervisor, or Zoe Robinette, our Program Administrator, suspect that an employee lacks the skills needed for proper fall protection, that employee will be retrained.

Changes in the job site, types of fall protection systems, and equipment will also necessitate retraining.

Only the latest Training Certificate will be kept on file.

Note: As a matter of policy, per §1510. Safety Instructions for Employees:

a. **When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.**

b. **The employer will permit only qualified persons to operate equipment and machinery.**

c. **Where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.**

Fall Protection at the Job Site

Following a hazard assessment, we will select the most advantageous fall protection system that is compatible with our task needs and our protection requirements.

While time, equipment, training, and money are devoted to fall protection systems which either physically prevent persons from falling from height, control the rate of deceleration during an actual fall, prevent objects from falling onto persons below, or warn personnel of restricted areas, we must never forget that it is important not to fall in the first place.

Accidents are more likely to occur as we become “adjusted” to working at height. Most slips, trips and falls are preventable. Proper footwear, wearing hard hats when there is a possibility of falling objects, cleaning up of debris, and paying attention to footing, hand holds, and edges is as important as the fall protection systems themselves.

Parking Concepts, Inc

Fall Protection Plan

(Required when standard fall protection systems are not feasible)

With changes: _____
(If no changes, enter “None”)

This Fall Protection Plan is specific for the following project:

Project Name: _____

Location of Job: _____

_____

Date Plan Prepared: _____ by: _____
(Must be a Qualified Person)

Date Plan Modified: _____ by: _____
(Must be a Qualified Person)

Date Plan Modified: _____ by: _____
(Must be a Qualified Person)

Plan Approved by: _____

Plan Supervised by: _____

Policy Statements

Our Fall Protection Program has been developed to protect our employees from the easily identifiable danger associated with working at height: falling. While the general concept of Fall Protection is straight forward, those employees to whom this Program applies must have specific training applicable to their individual jobs. It is recognized that the nature of fall hazards may vary from project to project and even change during a specific project. Training will be on-going to reflect the various existing work situations.

A copy of our Fall Protection Program can be found in the main office at:

7917 Selma Ave

Los Angeles, CA 90046

4158069348

A copy of our Fall Protection Plan will be found on every applicable Job Site.

Fall Protection Systems to be used on this Job

All employees on this job/project will be protected from fall hazards by the use of one or more conventional fall protection systems. These systems include guardrail systems, safety net systems, personal fall arrest systems, positioning device systems, warning line systems, controlled access zones, safety monitoring systems, covers, and protection from falling objects.

Further, the conventional fall protection system used in each required circumstance will be in compliance with 29 CFR 1926.502 which addresses which systems are appropriate (allowed) for specific types of work.

Training

All our personnel working on this job/project have received training in our Fall Protection Program and are able to recognize fall hazards and understand procedures to minimize these hazards. Further, they have been trained, as necessary, by a competent person qualified in the following areas using both formal and hands on training:

a. The nature of fall hazards in the work area.
b. The procedures for erecting, maintaining, disassembling, and inspecting the fall protections to be used.
c. The use and operation of guardrail systems, personal fall arrest systems, safety net systems' warning line systems, safety monitoring systems', controlled access zones, and other protection to be used.
d. Their role in the safety monitoring system when this system is used.
e. The limitations on the use of mechanical equipment during the performance of roofing work on low sloped roofs.
f. The procedures for handling and storage of equipment and materials and the erection of overhead protection.
g. The roll of employees in fall protection plans.

Enforcement

Awareness of and respect for fall hazards, and compliance with all safety rules are of great importance. Appropriate disciplinary action will be taken should an employee disregard our safety guidelines.

Accident Investigation

All accidents that result in injury to employees, regardless of their nature, will be investigated and reported. It is important that documentation of accidents take place as soon as possible so that the cause may be determined, and steps may be taken to prevent a reoccurrence.

Changes to this Plan

Changes to this plan, specifically a deviation from conventional fall protection systems, will be documented by a qualified person whose name appears on the front of this fall protection plan.

Changes will be limited to:

a. Leading edge work

Note: Leading edge work involves construction which moves the location of the edge forward (backward). Working at the edge of a walking/working surface (such as a roof) is not leading-edge work - it is (roofing) work at an unprotected side or edge.

b. Precast concrete construction work

c. Residential construction work

The criteria for determination that a conventional fall protection is infeasible is that it is impossible to perform construction work with a conventional fall protection system or it is technologically impossible to use a conventional fall protection system. Inconvenience and cost are not acceptable considerations.

Specific Fall Protection Plan criteria are found in 29 CFR 1926.502(k) and we will, if necessary, create a Fall Protection Plans that comply with the cited criteria.

A separate change will be made for each situation where conventional fall systems cannot be used.

Parking Concepts, Inc

Changes to Fall Protection Plan

CHANGE NUMBER: _____

This change to the Fall Protection Plan for the below listed project will be attached to the original Fall Protection Plan and a copy will be available at the job site.

Project Name: _____

Location of Job: _____

Date Change Prepared: _____ by: _____
(Must be a Qualified Person)

Date Change Modified: _____ by: _____
(Must be a Qualified Person)

Change Approved by: _____

Change Supervised by: _____

Reference the above.

Changes to this Fall Protection Plan for this specific project are required for the following reason(s):

Specific work that requires fall protection other than conventional fall protection:
_____
_____
_____
_____
_____
_____
_____

Specific work areas where the above work will take place:

_____

_____

_____

_____

_____

_____

_____

Before any non-conventional fall protections are used as part of the work plan, a controlled access zone (CAZ) will be clearly defined by the competent person _____as an

(Name(s) of Competent Person)

area where a recognized hazard exists. The demarcation of the CAZ will be communicated by the competent person in a recognized manner such as:

Circle one or more of the below:

a. signs
b. wires
c. tapes
d. ropes
e. chains
f. other:_____

All access to the CAZ will be restricted to authorized entrants. Those entrants will be identified by _____

(Color hard hats; arm bands, etc.)

and are listed below:

_____ _____ _____

_____ _____ _____

_____ _____ _____

The competent person will ensure the protective elements of the CAZ are implemented prior to the beginning of work.

Specific reasons why conventional fall protection is either infeasible or creates a greater hazard:

Specific measures to be taken to reduce or eliminate fall hazards for personnel who cannot be provided conventional fall protection:

In the above CAZ, a safety monitoring system will be implemented in conformance with 29 CFR 1926.502(h).

Parking Concepts, Inc

Safety Net Installation Certification

This is to certify that the Safety Net identified below was installed with sufficient clearance under it to prevent contact with the surface or structures below when subjected to an impact force equivalent to the drop test specified in 29 CFR 1926.502(c)(4)(i).

SAFETY NET MAKE: _____

SAFETY NET MODEL: _____

SAFETY NET LOCATION: _____

It was found to be unreasonable to perform the below listed drop test for the following reasons:

_____

_____

_____

_____

_____

Drop Test (Circle appropriate drop test to which the certification applies):

a. After initial installation and before using drop test.
b. After relocation drop test.
c. After major repair drop test.
d. After remaining in the same location for 6 months drop test.

_____ _____

(Competent Person) **(Date)**

Forklifts

§3650. Industrial Trucks, General
§3657. Elevating Employees with Lift Trucks
§3661. Brakes and Warning Devices
§3668. Powered Industrial Truck Operator Training

Overview

This program has been developed to make our truck operators aware of the hazards associated with motorized truck use as well as to provide guidance for safe truck operations.

Persons will be authorized to operate our forklifts only after they have successfully demonstrated their understanding of proper procedures for truck inspection, use, and refueling/recharging. Operators will demonstrate their truck knowledge and abilities by passing a written test and performing designated truck maneuvers. All truck operators will be evaluated by Zoe Robinette, our Forklift Program Administrator, or a designated competent person.

Because of their power, weight, size, restricted visibility, &, often, high center of gravity, operation of industrial trucks takes skill and attention to detail. One moment of inattention can lead to a major mishap in an instant. Additionally, the load presents potential hazards if not properly secured, balanced, and/or properly placed on the truck.

In accordance with 29 CFR 1910.178(b)12, Zoe Robinette, or other competent person, will determine whether the atmosphere or location in which our industrial trucks will operate is hazardous or non-hazardous &, after further assessing our needs, will determine which types of trucks are appropriate & allowed for our specific operations.

In the unlikely event that unsafe industrial motor truck operations are observed, retraining will be given with emphasis on correcting the improper behavior. To prevent the possibility of severe injury to the operator (or a bystander), our forklifts must be operated in a professional manner and anything less will not be tolerated.

All truck operators will have ready access to this program, appropriate OSHA standards, and the truck owner/operator manuals.

Forklifts

Forklifts are designed to move items quickly, safely, and cleanly. Forklift training would also apply to numerous types of powered industrial trucks such as: tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines.

While many safety features are designed into forklifts, accidents still happen, and they are generally the result of operator error. According to *Modern Materials Handling*, pg. E-18, Jul 97, powered industrial vehicles are involved in approximately 68,000 accidents annually, causing 90,000 injuries and 100 deaths.

There is a general agreement among safety professionals, as well as OSHA, that requiring training for all persons (including part-time, seasonal, and temporary employees) who operate forklifts will significantly reduce the accident and injury rates.

General Requirements

All truck operators must be thoroughly familiar with the truck, itself. This includes knowing:

a. Instinctively, what each and every control does.
b. How to perform a truck safety check.
c. The truck's limitations such as maximum load, height and width, visibility, stability, and surface requirements.
d. The truck's stopping and turning ability and its effect on loads.

The below safety rules and guidelines to which one must adhere while operating a forklift have been established. These rules are designed to protect the operator and/or persons adjacent to truck operations.

Specifically, no person will operate one of our trucks unless authorized in writing. Prior to authorization, the operator will have read this program, received training, passed a quiz on truck operations, and been evaluated on operational skills.

Authorization to operate one type of truck does not automatically authorize a person to operate all trucks. Different power sources, visibility restrictions, controls, and capacities may dictate, in the judgment of Zoe Robinette, that a separate certification process may be required for a different type of truck. There may be instances where a new vehicle does not necessitate new training and a demonstration of proficiency. A newer model of a currently used truck may be identical to the truck the operator is qualified on as far as safety and operations are concerned.

As a general rule, each **type** of truck has its own characteristics, limitations, and idiosyncrasies -- each **model** of a type of truck may or may not be unique.

No riders are allowed on our forklift unless:

a. The truck is specifically designed for such use.
b. The rider is authorized by Zoe Robinette.

Note: Forklifts are generally designed to move product, supplies and equipment, not personnel.

Zoe Robinette will revoke the authority to operate a truck if unsafe acts are observed or it is apparent that the operator has not retained the knowledge and job skills necessary to safely perform truck operations.

An operator who has lost his authorization to operate a truck will be retrained, reevaluated, and, if appropriate, re-certified.

At the beginning of each shift, the operator will inspect the truck using our Forklift Daily Checklist.

a. If deficiencies relating to safety are found, the deficiencies will be noted on the Checklist and reported to Zoe Robinette or other designated person. The vehicle will not be used until safety defects are repaired.
b. If cosmetic damage is discovered during the daily check, it will be noted on the Checklist, but the truck will be used. Cosmetic faults will not delay our operations.

Hazards

The major personal safety hazards involved in truck operation include:

a. Physically hitting a person/object with the truck or load.
b. Having a load fall and hit the operator or other person.
c. Having the truck tip and crush the operator or other person.
d. Fire or explosion during refueling/recharging.

Below are rules & guidelines to control the hazards identified & reduce the likelihood of accident/injury. While some of the procedures may seem too obvious to mention or just plain common sense, remember this —serious, even fatal, accidents have occurred because for one split second an operator forgot or ignored a basic safety rule.

Hitting a Person or Object

a. Never drive up to a person standing in front of a fixed object.
b. When possible, stay within delineated travel lanes or aisles.
c. Be seen and/or heard.
d. Ensure that adequate lighting is available.
e. Maintain a clear view of travel. If the load blocks or restricts the view, the operator will drive with the load trailing (backwards).
f. Slow down, sound horn, and do not pass where vision is restricted.
g. Operate the truck at speeds that will allow it and the load to be stopped in a safe, smooth, manner.
h. Be aware of floor conditions. Remove loose objects that have found their way to the truck travel lanes. Operate the truck at slower speeds on wet or slippery floors.
i. Of course, stunt or reckless driving is prohibited.
j. Be aware of the height of the truck and, if equipped, its mast and load. Carelessness can damage ceiling, lights, pipes, etc.
k. Never allow anyone to stand or pass under an elevated portion of any truck at any time.

Falling Loads:

Know your load – do not “over stack.” Because practically all loads lifted or hauled by a forklift are not secured to the truck, ensure the load is properly stacked.

a. Cartons generally should be interlaced or banded.
b. If lifting a load or pallet, get the forks (or other engaging means) as far under the load as possible.
c. Travel with the load in the lowest position for stability as well as prevention of hitting objects overhead. If using forks, tilt the load backward for stabilization.
d. Do not exceed the truck’s rated capacity or stack loads too high.
e. Do not make “jerky” movements such as slamming the brakes or high-speed turns.
f. A load backrest extension will reduce the possibility of part of the load falling rearward.
g. When using a forklift, the forks may be tilted forward only for picking up or setting down a load.

Tipping:

Forklifts are, by design, narrow allowing them greater access within the work setting. Unfortunately, a narrow track offers less stability. Tipping or falling off an edge (or dock) is a preventable accident by following the guidelines below. If your truck tips, keep your body and limbs within the safety of the cage. Wear a seat belt if the truck is so equipped.

a. Stay within travel lanes.
b. If entering a trailer, ensure:
    1. The trailer brakes are engaged.
    2. The trailer is secured from movement by means of chocks and/or a locking mechanism.
    3. The tractor is either shut off or removed from the trailer.
    4. The trailer is squared up with the dock opening and dock plates are secure.
    5. The trailer floor is capable of supporting the forklift and its load.
    6. The lighting within the trailer is adequate.

    Note: Falling off a dock edge because a trailer has moved is invariably a serious accident. Do not count on the tractor-trailer driver to lock his brakes or even trust that his brakes work. Physically check and ensure that the trailer into which you are taking your forklift is flush against the dock. If possible, the trailer should be actually attached to the dock, but in all cases, it should be chocked.
c. Travel with the load in the lowest possible position and avoid sharp turns at higher speeds as well as abrupt truck movements.
d. Be aware of the surface on which you are traveling -- its traction, ability to hold weight, slope, and surface.

Fire/Explosion During Refueling/Recharging:

Refueling accidents are not common experiences, however, should they occur, they would be sudden and possibly catastrophic. Follow the manufacturer's owner's manual and local fire laws.

a. There is absolutely NO SMOKING or open flame during any portion of the refueling/recharging process.
b. At least one approved portable fire extinguisher having a minimum rating of 8B:C must be readily available when refueling propane.
c. Facilities for quick drenching of the eyes and body must be readily available.

Other Concerns

The program deals primarily with the personal safety of our forklift operators. However, when discussing truck operations, we would be remiss if it were not pointed out that improper truck operations could also result in physical damage to products, trucks, and/or facilities. Proper truck operation will reduce personal injury accidents, and, as an added benefit, prevent general damage.

Operator Protection

A hazard assessment of forklift operations will be conducted by Zoe Robinette. Particular attention will be given to hand, head, eye, and foot protection, as well as environmental conditions such as atmospheres, heat, or cold. If the truck is equipped with a seat belt, it must be worn when the truck is moving.

Keep your limbs within the running lines of the truck and keep your hands and fingers away from moving parts -- particularly the mast on a forklift truck.

Zoe Robinette will perform a hazard assessment of our truck operations and determine what, if any, personal protective equipment (PPE) requirements are appropriate. If PPE (examples: steel toed boots, leather gloves, hard hat, eye protection, etc.) is required, it must be worn.

Forklift Operations

In addition to safety operating practices previously identified in this manual, the following will be considered general operating procedures:

a. Fire aisles, access to stairways, and fire equipment must be kept clear.
b. Operators leaving their trucks must ensure the load is fully lowered, controls neutralized, and brakes set. On an incline, the wheels must be blocked. If the operator is 25 feet or more from the truck or does not have a clear view of the truck, the power to the truck must be shut off.
c. A safe distance will be maintained from the edge of ramps or platforms while on any elevated dock, platform, or freight car.
d. Trucks will not be used for opening or closing freight doors. Trucks, like all items of equipment, will be used for the purpose for which they were designed.
e. Be aware that if the operator of a semi-trailer has placed the rear wheels in a far forward position, the trailer may act as a “teeter-totter” when a heavy forklift enters the trailer. When a trailer is not coupled to a tractor, fixed jacks may be necessary to support the semi-trailer during loading or unloading.
f. Be aware that the overhead guard (used as protection against falling objects) is designed to prevent injury from the impact of small packages, boxes, bagged material, etc. -- it is not necessarily designed to withstand the impact of a falling capacity load.
g. In the event persons are lifted by a truck, a lifting platform must be securely attached to the lifting mechanism and the persons on the safety platform must have means of shutting off power to the truck.
h. If more than one truck is operated, they must be separated by a safe distance (at least three truck lengths) and they may not pass each other in intersections, blind spots, or other dangerous locations. The right of way will be yielded to other trucks in emergency situations.
i. Trucks traveling in the same direction will not be passed at all.
j. Driving on grades:
    1. Grades will be ascended or descended slowly.
    2. When ascending or descending grades in excess of 10 percent, loaded trucks will be driven with the load upgrade.
k. Motorized hand trucks must enter confined areas with the load end forward.

Maintenance

While the operator is responsible for checking the truck before use, actual mechanical maintenance must be performed by an authorized person.

a. If at any time a forklift is found to be in need of repair, defective, overheating, or in any way unsafe, the truck will be taken out of service until it has been restored to safe operating condition.
b. Forklifts should be kept reasonably clean and free of excess oil and grease.

Duties of the Forklift Administrator

The duties of Zoe Robinette, our Forklift Program Administrator, include:

a. Operator training and certification.
b. Hazard assessment of our truck operations.
c. Identification of truck operators who, through their performance have demonstrated a lack of retained knowledge or ability to safely operate a powered truck. These people will receive retraining.
d. Keeping up to date of developments in the materials handling field with an emphasis on safety.
e. Ensure the set of operating rules, following this program, are posted when our forklifts are in use.

Additionally, the administrator will ensure that all truck operators have ready access to Cal/OSHA powered industrial truck standards and the individual truck's Operator/Owner Manual.

Training

will administer the training portion of this program.

Interactive training will be given by a competent (one with knowledge, training, and experience) person with ample opportunity to ask questions and clarify all aspects of truck operation relating to safety.

Prior to actual truck operation on the job, all truck operators will become familiar with the contents of this program as well as the operator's manual applicable to the specific powered truck they will operate. Each operator will demonstrate an understanding of truck operations and complete a driving test which will include truck inspection, maneuvering, and fueling/charging.

New truck operators may operate powered trucks in a training capacity:

a. When they are under the direct supervision of persons who have the knowledge, training, and experience to train and evaluate their competence.
b. Where such operation does not endanger themselves or others.

will ensure that all truck operators have a complete understanding of the below listed topics:

<u>Truck-Related Topics:</u>

a. Operating instructions, warnings, and precautions for the type of truck the operator will be authorized to operate.
b. Differences between the truck and the automobile.
c. Truck controls and instrumentation: where they are located, what they do, and how they work.

d. Engine or motor operation.
e. Steering and maneuvering.
f. Visibility (including restrictions due to loading).
g. Fork and attachment adaptation, operation, and use limitations.
h. Vehicle capacity.
i. Vehicle stability.
j. Any vehicle inspection and maintenance that the operator will be required to perform.
k. Refueling and/or charging and recharging of batteries.
l. Operating limitations.
m. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

Work-Related Topics:

a. Surface conditions where the vehicle will be operated.
b. Composition of loads to be carried and load stability.
c. Load manipulation, stacking, and unstacking.
d. Pedestrian traffic in areas where the vehicle will be operated.
e. Narrow aisles and other restricted places where the vehicle will be operated.
f. Hazardous (classified) locations where the vehicle will be operated.
g. Ramps and other sloped surfaces that could affect the vehicle's stability.
h. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust.
i. Other unique or potentially hazardous environmental conditions in the work area that could affect safe operation.

Refresher training in relevant topics will be provided to the operator when:

a. If unsafe truck operations are observed.
b. After an accident or near accident.
c. Operator has received an evaluation that reveals that the operator is not operating the truck safely
d. If the operator is to be assigned to drive a different type of truck.
e. If work area changes could affect safe operation of the truck.

An evaluation of each powered industrial truck operator's performance must be conducted at least once every three years and refresher training will be provided as needed.

Note: As a matter of policy, per §1510. Safety Instructions for Employees:

a. When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.

b. The employer will permit only qualified persons to operate equipment and machinery.

c. Where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.

Use of Forklifts to Support Scaffold Platforms

Per 29 CFR 1926.451(c)(2)(v), if deemed appropriate, forklifts may be used to support scaffold platforms with the following conditions:

a. The forklift will be designed for such use as indicated either:
    1. In the owner's manual, or
    2. By a letter from the manufacturer allowing such use, or
    3. Certification by a registered engineer that the forklift is so designed.
b. The entire scaffold platform is securely attached to the forks.
c. The forklift is not moved horizontally while the platform is occupied.
d. The platform (and machine) meets the requirements of 29 CFR 1926.451 for capacity, construction, access, use, and fall protection.
    1. If the platform is not designed by the manufacturer of the forklift, it must be designed by a qualified person.
    2. The forklift must be capable of supporting, without failure, its own weight and at least four times the maximum intended load.
e. The platform for elevating personnel must not extend more than 10 inches beyond the wheelbase of the machine in use.
f. The employees on the platform must be able to have travel and power controls at the platform level.
    1. This requirement is fulfilled by having the forklift operator remain with the forklift while personnel are on the platform.
g. The use of a forklift to support a scaffold platform will be used only after a determination that the use of other equipment such as scaffolds, scissor lifts, aerial lifts, and ladders is not practical.

Parking Concepts, Inc

Forklift Operating Rules

The below set of Forklift operating rules will be strictly enforced:

a. Only trained and authorized drivers may operate forklifts.
b. Stunt driving and horseplay are prohibited.
c. Employees must not ride on the forks.
d. Employees must never be permitted under the forks (unless forks are blocked).
e. The driver must inspect the vehicle at the beginning of each shift.
f. The operator must look in the direction of travel and must not move the vehicle until all persons are clear of the vehicle.
g. Forks must be carried as low as possible.
h. The operator must lower the forks, shut off the engine, and set the brakes (or block the wheels) before leaving the forklift unattended (that is, when the operator is out of sight of the vehicle or 25 ft. away from it).
i. Trucks must be blocked, and brakes must be set before a forklift is driven onto the Truck bed.
j. Extreme care must be taken when tilting elevated loads.
k. The forklift must have operable brakes capable of stopping it safely when it is fully loaded.

_____

Zoe Robinette

Safety Director

Hazard Communication

§3203. Injury and Illness Prevention Program.
§5194. Hazard Communication (adopted on May 6, 2013)
§5194. Hazard Communication, Appendix A (adopted on May 6, 2013)
§5194. Hazard Communication, Appendix B (adopted on May 6, 2013)
§5194. Hazard Communication, Appendix C (adopted on May 6, 2013)
§5194. Hazard Communication, Appendix D (adopted on May 6, 2013)
§5194. Hazard Communication, Appendix E (adopted on May 6, 2013)
§5194. Hazard Communication, Appendix F (adopted on May 6, 2013)
§5194. Hazard Communication, Appendix G (adopted on May 6, 2013)
§5203. Carcinogen Report of Use Requirements.

Purpose

The purpose of our hazard communication program is to ensure that the hazards of all chemicals produced or imported are classified, and that information concerning the classified hazards is transmitted to our company and, most importantly, our employees. The requirements of our hazard communication program are to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS), primarily Revision 7. The transmittal of information is to be accomplished by means of our comprehensive hazard communication program.

We will develop, implement, and maintain **at the workplace** a comprehensive written hazard communication program for our employees which includes container labeling and other forms of warning, safety data sheets and employee training.

§5194. Hazard Communication (adopted on May 6, 2013) applies to any hazardous substance which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a reasonably foreseeable emergency resulting from workplace operations.

We will maintain a list of the hazardous substances known to be present using an identity that is referenced on the appropriate safety data sheet (SDS). This list may be compiled for the workplace as a whole or for individual work areas.

Manufacturers, importers, and distributors will obtain or develop a safety data sheet for each hazardous substance they produce or import. We will obtain from the manufacturer or seller an SDS of each hazardous substance which we use and maintain these SDS on the job site.

As a matter of course, before a new product is purchased, we will review its SDS to determine the presence of carcinogenic or other extremely hazardous chemicals. Using this information from the SDS, we will be able to inform employees how they will be protected from carcinogens at the workplace.

Prior to performing a non-routine task (for example, the cleaning of reactor vessels), an employee will be given information by a competent person or supervisor concerning the hazardous chemicals to which he may be exposed. This information will include:

a. Specific chemical hazards
b. Protective/safety measures the employee is to use.
c. Measures taken to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.

Should work activities be performed in areas where chemicals are transferred through unlabeled pipes, the employee will be informed by the competent person or supervisor of:

a. The chemical in the pipes.
b. Viscosity, pressure, heat.
c. Potential Hazards.
d. Safety precautions to be taken.

In multi-employer workplaces, the written hazard communication program will include the methods employers will use to inform any employers sharing the same work area of the hazardous chemicals to which their employees may be exposed while performing their work, and any suggestions for appropriate protective measures, including the following:

The competent person on the job site will inform those with whom we work of any hazardous chemical products we are using and will provide them with the appropriate SDS for their review. SDS for all chemical products used on the job site will be readily available.

Should we introduce a new chemical product to the job site that contains a physical or health safety hazard, the product's SDS will accompany that product and, before use, employees will be given instruction on the products hazards. This information will be shared with other contractors with whom we may be working. Employees are to be kept informed of the chemical products being used by other contractors if they pose a safety hazard.

This Hazard Communication Program is available, upon request, to employees, their designated representatives, the Chief, and NIOSH.

Labels and Other Forms of Warning

The manufacturer, importer, or distributor will ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged or marked. Where the manufacturer, importer, or distributor is required to label, tag or mark the following information will be provided:

a. Product identifier;
b. Signal word;
c. Hazard statement(s);
d. Pictogram(s);
e. Precautionary statement(s); and,
f. Name, U.S. address, U.S telephone number, and manufacturer, importer, or other responsible party.

The manufacturer, importer, distributor or employer preparing the safety data sheet will ensure that the information provided accurately reflects the scientific evidence used in making the hazard determination. If the manufacturer, importer, distributor, or employer become aware of any significant information regarding the hazards of a chemical, or ways to protect against the hazards, this new information will be added to the safety data sheet within three months. If the chemical is not currently being produced or imported, the manufacturer, importer, or distributor will add the information to the safety data sheet before the chemical is introduced into the workplace again.

Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Example below for labeling:

We may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required by the above to be on a label. The written materials will be readily accessible to the employees at Parking Concepts, Inc in their work area throughout each work shift. We may use such written materials in lieu of affixing labels to individual containers as long as the alternative method identifies and accompanies the containers to which it is applicable and conveys the information required to be on a label.

Secondary Labeling

If chemicals are transferred to a secondary container, they must comply with the labeling requirements if any of the following situations occur:

a. The contents in the secondary container are not used during the work shift of the person who made the transfer.
b. The employee who made the transfer is no longer going to be in the work area.
c. The container is moved to another work area and is no longer in the possession of the employee who filled the container.

We **are not required** to label portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer.

We will not remove or intentionally deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.

We will ensure that workplace labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. If we have employees who speak languages other than English, we will add the information to the presented material translated to the appropriate language and the information will be presented in their language.

Note: OSHA pictograms do not replace the diamond shaped labels that the U.S. Department of Transportation (DOT) requires for the transport of chemicals, including chemical drums, chemical totes, tanks, or other containers. Those labels must be on the external part of a shipped container and meet the DOT requirements set forth in 49 CFR 172, Subpart E.

Employee Information and Training

We will provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard is introduced into their work area. Information and training may relate to general classes of hazardous chemicals to the extent appropriate and related to reasonably foreseeable exposures of the job. Chemical-specific information must always be available through labels and safety data sheets.

Information and training will consist of at least the following topics:

a. Employees will be informed of the requirements of §5194. Hazard Communication (adopted on May 6, 2013).
b. Employees will be informed of any operations in their work area where hazardous chemicals are present.
c. Employees will be informed of the location and availability of the written hazard communication program, including the list(s) of hazardous chemicals and safety data sheets required by this section.
d. Employees will be trained in the methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).
e. Employees will be trained in the physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area, and the measures they can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
f. Employees will be trained in the details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer and the safety data sheet, and how employees can obtain and use the appropriate hazard information.

Documentation of Training

Documentation of safety and health training required by §5194. Hazard Communication (adopted on May 6, 2013) will be maintained for at least one (1) year.

Documentation will include:

a. employee name or another identifier
b. training dates
c. type(s) of training
d. training providers

Employees will be informed employees of the right:

a. To personally receive information regarding hazardous substances to which they may be exposed, according to the provisions of this section;
b. For their physician or collective bargaining agent to receive information regarding hazardous substances to which the employee may be exposed according to provisions of this section;
c. Against discharge or other discrimination due to the employee's exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act.

Whenever the employer receives a new or revised safety data sheet, such information will be provided to employees on a timely basis not to exceed 30 days after receipt, if the new information indicates significantly increased risks to, or measures necessary to protect, employee health as compared to those stated on a safety data sheet previously provided.

Proposition 65

For all practical purposes, the provisions of this program adequately address hazard awareness of hazardous chemicals known to the state to cause cancer of reproductive toxicity.

As a matter of policy, employees will be advised through labeling or other means in this program of all hazardous chemicals known to the state to cause cancer of reproductive toxicity.

Parking Concepts, Inc

List of Hazardous Chemicals

The Safety Data Sheets for the below listed Hazardous Chemicals will follow this list. The Safety Data Sheets are arranged in the order listed below:

Chemicals

Heat Illness Prevention (Indoor) Program

§3396 Heat Illness Prevention in Indoor Places of Employment

In order to lessen this threat and to comply with Heat Illness Prevention Standard T8 CCR 3396, this program has been prepared.

Parking Concepts, Inc will establish, implement and maintain this program that includes procedures for drinking water, cool-down areas, preventative rest periods, close observation during acclimatization, assessment and measurement of heat, training, prompt emergency response, and feasible control measures.

Our Contact Person/Program Administrator is: Zoe Robinette

All current employees will be given instruction in this program prior to working in heat illness inducing environments or other severe environmental conditions. All new hires will be given this instruction prior to performing any job task. These written procedures, as well as all safety materials, are readily available to all employees.

This program will be implemented when indoor temperatures equal or exceed 82 degrees Fahrenheit when employees are present.

Exceptions:

a. Incidental exposure where an employee is exposed to temperatures at or above 82 degrees Fahrenheit and below 95 degrees Fahrenheit for less than 15 minutes in any 60-minute period.
    1. These exceptions do not apply to:
        i. Vehicles without properly functioning air conditioning; or
        ii. Shipping or intermodal containers during loading, unloading, or related work.
b. Emergency operations directly involved in the protection of life or property.

Emergency Response Procedures

All persons should recognize the symptoms of heat related illness. Symptoms of heat exhaustion include fatigue, weakness, profuse sweating, normal temperature, pale clammy skin, headache, cramps, vomiting, and fainting.

If left untreated, heat exhaustion can become heat stroke rather quickly. The symptoms for heat stroke include dizziness, nausea, severe headache, hot dry skin, confusion, collapse, delirium, coma, and death.

The purpose of this program is to take definitive measures prior to the onset of heat exhaustion and heat stroke so that medical response will not be necessary. If the above conditions do present themselves, the supervisor, who will always have access to a mobile phone, will follow our standard emergency procedures.

Standard Emergency Procedures

The following are standard procedures during an emergency:

a. Call 911 or the emergency response number posted on the job site.
b. Provide clear and precise directions to the work site for the emergency responders. When necessary, transport the employee safely to a place where he or she can be reached by the emergency medical providers.

c. Provide any medical assistance he/she is trained and certified to do. See basic first aid for heat illness below.
d. **DO NOT** provide any medical assistance he/she is not trained to do.
e. **DO NOT** leave the employee suffering from a heat illness unattended or send the employee home without on-site first aid or providing emergency medical services.

If cell phone coverage is not adequate at a job site, a designated person will immediately contact emergency medical services on behalf of employees. The designated person will have open and direct communication with employees (such as by radio) so they can be notified of the need for emergency medical services.

If employees have means to contact emergency medical services directly, they will be permitted to do so. Employees will be expected to follow the same standard emergency procedures listed above.

Supervisors and employees will be trained to recognize symptoms of heat illness and provide basic first aid. Basic steps for treating symptoms of heat illness are addressed below.

Heat Exhaustion

Remove from hot area and have victim lie down and raise their feet. Apply cool wet towels and loosen or remove clothing. Allow small sips of water if the victim is not vomiting.

Heat Stroke

Call for immediate medical assistance. Move the victim from the hot area, have them remove their clothing, and lay down. Cool the body using a shower or cool, wet towels. Do not give stimulants.

Definitive measures to prevent heat related illness includes providing workers water, shade, rest, and if necessary, modified work procedures.

Provision of Water

Water is a key preventive measure to minimize the risk of heat related illnesses. Employees will have access to adequate quantities of potable drinking water. The water must be fresh, pure, suitably cool, and will be free of charge to employees. To ensure that drinking water meets this criterion, supervisors will examine the water and pour some on their skin before it is provided to employees.

Note: During hot weather, the water must be cooler than the ambient temperature but not so cool as to cause discomfort.

Where the supply of water is not plumbed or otherwise continuously supplied, water will be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking for the entire shift.

Note: Water from non-approved or non-tested water sources (e.g., untested wells) is not acceptable. If hoses or connections are used, they must be governmentally approved for potable drinking water systems, as shown on the manufacturer's label.

Supervisors will encourage the frequent drinking of water. The supervisor or a designated person will monitor water consumption every 30 minutes. Employees are encouraged to report bad tasting water, bad smelling water, or low levels of water immediately so the situation can be corrected.

Supervisors will provide frequent reminders to employees to drink water, and, if needed, more water breaks will be provided. Every morning during conditions where this program is applicable, there will be short tailgate meetings to remind workers about the importance of frequent consumption of water throughout the shift.

Clean water containers will be placed as close as possible to the workers. Placing water only in designated shade areas or near toilet facilities is not sufficient. If employees are working over a large area, water will be placed in multiple locations. For example, if we are working on a multi-story construction site, water will be safely accessible from every floor. Disposable/single use drinking cups will be provided to employees.

Supervisors will remind employees that personal military style canteens may be worn containing water. Employees are cautioned, however, that sharing water from a personal canteen is forbidden and, because of the health hazard to the user and the person with whom it is shared, disciplinary action will be taken against both employees if they drink out of the same container. This disciplinary action will be documented using our disciplinary enforcement form.

The following designated persons, such as a program administrator, safety coordinator, supervisor, foreman, field supervisor, crew leader, has the authority and responsibility for implementing the provisions of this program at this worksite.

Name	Title	Phone Number
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

As a reminder of the importance of water to the human system, the following information is supplied, which was extracted from one of our safety meetings:

Fluids

If you heard in advance that this safety meeting was on fluids, you may well have thought that the meeting would focus on the storage, use, clean-up, and possible emergency procedures involved with the liquid chemical products used on or near work areas. You'd be wrong. While the above are important topics and questions related to them should be addressed to the competent person, this safety meeting is about your bodily fluids.

From a safety standpoint, you must not neglect your need for potable (drinkable) fluids. Water is not only the most abundant of all compounds found on the earth, but also the most abundant part of you – actually about 65% of you is water.

Drink fluids! From a life process standpoint, what fluid intake is doing is keeping you healthy by allowing your body to maintain its core body temperature at its appropriate level. When your brain senses that cooling action is needed, your body circulates blood to your skin to allow it to cool with the outside temperature. If the water used for sweat is not replaced, a water deficit starts to occur. The millions of chemical reactions taking place in your body at every moment can only occur in the presence of water. The fluids in your body transport nourishment, gases, and waste.

Imagine your body as a water-based chemical factory that functions only within a narrow temperature range. An average healthy person at rest has an oral temperature of between 98.6º F and 100.4º F. If your body temperature reaches 105.8º F, convulsions may occur. Your whole central nervous system is impaired when your body temperature raises 9º F above normal.

At 106.0º F, the thermo-regulatory center in your brain fails and, because of damage to your central nervous system, the sweating (cooling) mechanism cuts off when you need it most. It is a vicious circle – the hotter you get, the more heat you generate through metabolism. In fact, at 107.6º F, cellular metabolism is 50% higher than at normal temperatures.

Without getting too graphic, here are some of the problems associated with extreme water loss: cells will shrink; the skin will lose its elasticity; skin and mucous membrane cells will dry out; eyeballs will become soft; weight loss will occur; the body temperature will rise; apprehension, restlessness, and even coma may occur; urine will become concentrated; renal (kidney) shutdown will occur; red blood cells will shrink; death.

In addition to the procedures above, Parking Concepts, Inc will ensure the provision of water using the following procedures:

a. _____

b. _____

c. _____

d. _____

Stay healthy! Drink water! Water is truly the stuff of life.

Access to Cool-Down Areas

The supervisor will ensure that employees have access to cool-down areas to minimize the risk of heat related illnesses. The cool-down area will maintain a temperature less than 82 degrees Fahrenheit.

At or below temperatures of 82º F, the supervisor will ensure that employees have timely access to cool-down areas upon request. Any employee who feels the need for a cool-down period is encouraged to set in the cool-down area for no less than 5 minutes.

Note: "Temperature" means the dry bulb temperature in degrees Fahrenheit obtainable by using a thermometer to measure the indoor temperature in work areas.

Supervisors will monitor on-site thermometers to determine whether the temperature is in fact exceeding 82º F in the work areas. For temperatures above 82º F, one or more cool-down areas will be provided at all times while employees are present. Cool-down areas will accommodate all employees on a recovery, rest, or meal period at any one time. The cool-down area must allow employees to sit in a normal posture fully in the cool-down area without having to be in physical contact with others. Breaks may be staggered if necessary to provide adequate shade to a large number of employees on-site.

Employees who take a preventative cool-down rest will:

a. Be monitored and asked if they are experiencing symptoms of heat illness; and
b. Be encouraged to remain in the cool-down area; and
c. Not be left alone; and

d. Not be sent home until being offered onsite first aid and/or being provided with emergency medical services in accordance with our Emergency Response Procedures; and
e. Not be ordered to work until the employee is no longer experiencing signs or symptoms of heat illness, and in no event less than 5 minutes.

If an employee displays signs or reports symptoms of heat illness while on a cool-down rest period, the appropriate first aid or emergency response will be provided per our Emergency Response Procedures in this program.

In addition to the procedures above, Parking Concepts, Inc will ensure the provision for shade using the following procedures:

a. _____
b. _____
c. _____
d. _____

Weather Monitoring

Supervisors will be trained and instructed how to check weather reports and how to respond to hot weather advisories that may affect indoor work areas.

In addition to the procedures above, Parking Concepts, Inc will ensure the provision for monitoring the weather using the following procedures:

a. _____
b. _____
c. _____
d. _____

Assessment and Control Measures

Our company will measure the temperature and heat index of work areas, and record whichever temperature is higher. We will identify and evaluate all other environmental risk factors for heat illness. All records must include:

a. Date
b. Time
c. Specific location of measurement

An initial measurement will be taken when it is reasonable to suspect the work area will be at or above 82 degrees Fahrenheit. Additional measures will be taken when employee exposure is expected to be the greatest.

Measures will be taken when it is reasonably expected to be 10 degrees Fahrenheit or more above the previous measurement, and during the time worker exposure is expected to be the greatest.

All temperature records will be retained for 12 months or until the next measurements are taken, whichever is later. Records will be available for employees, designated representatives as defined in section 3204, and representatives of the Division at the worksite and upon request.

All instruments used to record temperature or heat index will be used and maintained per the manufacturer’s recommendations. Any device used to measure the heat index will provide the same results as those in the NWS heat index chart in Appendix A.

Employees and their union representatives will actively participate in the planning, conducting, and recording the measurements of temperature or heat index, whichever is greater, as required per subsection (e)(1) of §3396 - Heat Illness Prevention in Indoor Places of Employment. Employees and their union representatives will also participate in identifying and evaluating any other potential environmental risk factors for heat illness.

Parking Concepts, Inc will implement control measures to minimize the risk of heat illness. Controls measures will depend on the environmental risk factors for heat illness present in the work area.

When employees are present and the temperature and heat index are at or above 87 degrees Fahrenheit, or the temperature is 82 degrees Fahrenheit or more where employees wear clothing that restricts heat removal or work in radiant heat areas, we will implement engineering controls to reduce and maintain a temperature and heat index below 87 degrees Fahrenheit, or the temperature below 82 degrees Fahrenheit except to the extent that our company can demonstrate such controls are infeasible.

When it is infeasible to meet the temperature and heat index limits, we will use engineering controls to reduce the temperature, heat index, or both, to the lowest feasible level, except to the extent that we can demonstrate the controls are infeasible. We will use engineering controls to minimize the risk of heat illness, except to the extent that we can demonstrate such controls are not feasible.

When engineering controls are not enough to reduce and maintain the temperature and heat index below 87 degrees Fahrenheit when employees are present, or the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in radiant heat areas, our company will use administrative controls to minimize the risk of heat illness, except to the extent that it can be demonstrated such controls are not feasible.

Personal heat-protective equipment will be used when engineering controls are not capable of reducing and maintaining the temperature and heat index below 87 degrees Fahrenheit when employees are present, or reducing and maintaining 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat areas and feasible administrative controls are unable to minimize the risk of heat illness, except to the extent that we demonstrate such equipment is not feasible.

Procedures for Acclimatization

Acclimatization is the temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. In more common terms, the body needs time to adapt when temperatures rise suddenly, and an employee risks heat illness by not taking it easy when a heat wave or heat spike strikes, or when starting a new job that exposes the employee to heat to which the employee's body hasn't yet adjusted.

Inadequate acclimatization can be significantly more perilous in conditions of high heat and physical stress. We are responsible for the working conditions of our employees, and we will implement additional protective measures when conditions result in sudden exposure to heat our employees are not accustomed to.

a. The weather will be monitored daily. The supervisor will be on the lookout for heat waves, heat spikes, or temperatures to which employees haven't been exposed for several weeks or longer.
b. During a heat wave or heat spike, the workday will be cut short, be rescheduled, or if at all possible, cease for the day.
c. New employees and those who have been newly assigned to a high heat area will be closely observed by the supervisor or designated person for the first 14 days. The intensity of the work will be lessened during a two-week break-in period by using procedures such as scheduling slower paced, less physically demanding work during the hot parts of the day and the heaviest work activities during the cooler parts of the day such as early morning or evening. Steps taken to lessen the intensity of the workload for new employees will be documented.
d. The supervisor or the designee will be extra vigilant with new employees and stay alert to the presence of heat-related symptoms.
e. New employees will be assigned a "buddy," or experienced coworker, so they can watch each other closely for discomfort or symptoms of heat illness.
f. During a heat wave, all employees will be observed closely (or maintain frequent communication via phone or radio) for possible symptoms of heat illness.
g. Employees and supervisors will be trained on the importance of acclimatization, how it is developed, and how these company procedures address it.

In addition to the procedures above, Parking Concepts, Inc will ensure that employees are acclimatized using the following procedures:

a. _____
b. _____
c. _____
d. _____

Training

Employee Training

All employees will read this program and be given interactive training in its provisions. A copy of this program will be kept in our project manual during applicable periods of heat and humidity. Training will be provided before any work involving a risk of heat illness and refresher training will be provided as needed.

Employee training will focus on:

a. Environmental and personal risk factors for heat illness, as well as additional factors like exertion, clothing, and personal protective equipment
b. Our procedures for complying with the Heat Illness Prevention standard
c. The importance of drinking water frequently, up to 4 cups per hour, during hot weather or when sweating more than usual while performing work tasks

d. The importance of acclimatization
e. Different types of heat illness and their common signs and symptoms
f. The importance of reporting to a supervisor the signs and symptoms of heat illness in themselves and others
g. Our procedures for responding to symptoms of heat illness, including how emergency medical services will be provided
h. Our procedures for contacting emergency medical services and, if necessary, for transporting employees to a place where they can be easily and safely reached by emergency medical personnel
i. Our procedures for making sure that emergency medical services have clear and precise directions to the work site, including designating a person to be responsible for invoking emergency procedures as appropriate.
j. Our Emergency Response Procedures

Supervisor Training

All supervisors will receive heat illness training prior to supervision of employees. Zoe Robinette will ensure that supervisors are well versed in the hazards of, and prevention of, heat related illnesses.

Supervisor training will focus on:

a. All of the information covered in employee training (see above)
b. The procedures he or she is to follow to implement applicable provisions of the program
c. The procedures to follow when an employee displays symptoms of heat illness, including emergency response procedures
d. How to monitor weather reports and how to respond to hot weather advisories

Training will include reading the below informational items prior to utilization of this program and having the opportunity for discussion and clarification of the below topics as well as the provisions of this program with Zoe Robinette.

§3396. Heat Illness Prevention

Training records will be maintained as specified in the California Code of Regulations, title 8, section 3203 (Injury and Illness Prevention Program).

Note: As a matter of policy, per §1510. Safety Instructions for Employees:

a. When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.

b. We will only permit qualified persons to operate equipment and machinery.

c. Where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.

Personal Protective Equipment - General

§1520. Hand Protection
§1522. Body Protection
§3381. Head Protection
§3382. Eye and Face Protection
§3385. Foot Protection
§5096. Exposure Limits for Noise
§5144. Respiratory Protection

Overview

This Personal Protective Equipment (PPE) Program has been prepared to inform our employees of potential hazards on the job site and to identify the proper PPE to be used to reduce or eliminate these hazards. This Program relies on a cooperative effort by all personnel to understand the reasons for PPE and to protect themselves from harm.

The use of PPE does not lessen an employee's obligation to use safe work practices and procedures. Employees are expected to be aware of the hazards within their area of responsibility and properly use prescribed PPE.

Our operations, work methods, and individual job sites present specific hazards which must be identified, analyzed, and matched with the appropriate PPE through a continuing hazard assessment process.

A Certificate of Hazard Assessment will be kept on the job site for inspection purposes.

Duties of the PPE Program Administrator

The primary duties of Zoe Robinette, our Program Administrator include hazard assessment; PPE selection; PPE training; and monitoring of our PPE Program. Certain types of PPE may require hands-on training before on the job use (primarily for sizing and fitting) and this training may be further delegated to competent persons.

Hazard Assessment and PPE Selection

A careful, systematic personal protective equipment selection process is used to identify what, if any, protection is required to reduce or eliminate the possibility of eye, hand, foot, limb, or head injury.

Hazard assessment, performed by Zoe Robinette, or a designated competent person, starts with a thorough knowledge of our job sites, work procedures, and methods of operation as well as the hazards that may be created by other contractors working in the vicinity of our employees. The basic hazard categories are: impact, penetration, compression, chemical, heat, harmful dust, and light radiation.

Identifying the source of the above hazards allows for consideration of administrative or engineering controls to eliminate the hazard as opposed to providing protection against it. Examples would include redirecting traffic flow, ventilation, temporary weather barriers, non-slip surfaces, etc.

Because administrative and engineering controls are passive – no employee involvement is required – they are preferable to PPE.

A PPE selection is made by analyzing the above information and evaluating the type of risk, the level of risk, the potential for injury and the possible seriousness of that injury. PPE, which is compatible with the above risks and work situation, is considered. Actual selection involves all the above factors plus an attempt to provide a level of protection greater than the minimum required.

In all situations where it has been determined that a particular type of PPE is to be used, it will be used. There will be no exceptions, by virtue of position or rank, to this policy. Within an area on a job site where the possibility of falling objects exists, hard hats will be worn. It follows that once an item of PPE (hard hat, in this case) is selected, it must be used by all persons in the identified area regardless of job title or function.

Having Zoe Robinette, or designated competent person, on a job site to determine the PPE requirements allows for knowledgeable selection and consistency, and eliminates chaos that would result if each individual were to decide when, where, and if PPE should be used.

Dissemination of PPE Selection Information

Employees must understand when PPE is necessary and what type(s) of PPE are necessary.

All persons for whom PPE will provide a measure of safety will be given appropriate training on that item of PPE as well as an explanation of the importance of its use.

ANSI Standards and PPE

Most items of PPE are manufactured in accordance with a specific American National Standards Institute (ANSI) or American Society for Testing and Materials (ASTM) standard. For example, Protective helmets placed in service on or before October 30, 2004 will comply with one of the following ANSI standards, which are hereby incorporated by reference: ANSI Z89.1-1969 Safety Requirements for Industrial Head Protection; ANSI Z89.2-1971 Industrial Protective Helmets for Electrical Workers, Class B; ANSI Z89.1-1981 Requirements for Protective Headwear for Industrial Workers; ANSI Z89.1-1986 Protective Headwear for Industrial Workers -- Requirements; or ANSI Z89.1-1997 Industrial Head Protection.

PPE safety products are tested to ensure they meet ANSI standards. Because products are tested in the manner in which they are designed to be used, ANSI certification is valid only if the user follows the manufacturer’s instructions for proper sizing, fitting, wearing, and adjusting. A review of OSHA citations reveals that fines can be levied because employees were improperly using PPE. For example, a hard hat worn with the bill toward the rear may provide adequate protection from impact; however, because it is tested with the bill toward the front, this improper use is cause for a safety violation.

Prior to purchase, items of selected PPE will be checked to ensure they were manufactured in accordance with the proper ANSI standard.

The importance of hazard assessment takes on added significance when judgments are made matching the hazard to the protection desired in cases where ANSI certification is not available. What matters most is: does the selected PPE do what it is intended to do?

Employee owned PPE must be approved for use by Zoe Robinette. Further, such equipment must be properly maintained and cleaned in accordance with the manufacturer’s instructions.

Sizing and Fitting

The word “personal” in the phrase “personal protective equipment” correctly implies that the equipment is for a specific person. As such, sizing and fitting are important for a variety of reasons.

a. Function: An improperly fitted piece of PPE may not do its job. For example, eye protection against dust must have an excellent face seal.
b. Comfort: The likelihood of continued use is increased if the PPE selected is comfortably fitted. Example: gloves that fit poorly and, over time, make a person’s hands hot and clammy are likely to be removed exposing that person to the hazard for which the gloves were required in the first place.
c. Safety: Ill-fitting PPE may actually cause an accident. Example: loose hard hat may slip and block one’s vision.

Most PPE come in a variety of sizes and within those size groups, adjustments may be made to affect a perfect fit. It is important to understand the procedures for donning, adjusting, using, and removing PPE. Each person who is required to use any type of PPE will be taught, before initial issue, the specific procedures for properly donning, adjusting, using, and removing the specific PPE. This instruction will generally be given by the employee’s Supervisor. When available, the manufacturer’s instructions will be issued with the PPE.

Care and Maintenance of PPE

PPE will be visually inspected before each use and if defects are noticed, it will not be used. Some types of PPE are expendable (cotton gloves) and have a limited life span after which they are discarded, and new PPE is reissued. Plastic safety glasses become scratched and they too must be exchanged for new ones when vision is impaired. Other types of safety equipment consist of both non-expendable and expendable components. A hard hat is non-expendable, yet the head band does wear out and becomes expendable. PPE will be maintained in accordance with the manufacturer’s instructions and, where appropriate, kept in a sanitary condition.

Cleanliness takes on an added importance when dealing with PPE designed to protect the eyes & face. Dirty or fogged lenses can impair vision &, rather than offer protection from a hazard, actually becomes a contributory factor in causing an accident.

Lastly, should PPE become contaminated with a chemical substance and decontamination is impossible, the PPE will be properly disposed of following the disposal instructions on the Safety Data Sheet for that substance.

Training

Affected employees will be given an understanding of:

a. When PPE is necessary.
b. What PPE is necessary.
c. How to properly put on, take off, adjust, and wear PPE.
d. The limitations of the PPE.
e. The proper care, maintenance, useful life and disposal of the PPE.

Retraining will be given in situations when changes in PPE requirements render the previous training obsolete or it is noticed that an employee is not following our PPE policies – specifically, not properly wearing the selected PPE in identified locations or work situations.

As a contractor, we are not required to have a PPE Program, per se, nor is the hazard assessment a ***specific*** requirement. In fact, there is no hand protection standard. Construction standards are short and to the point. The complete standard for head protection is printed on the following page.

§3381. Head Protection.

a. Employees working in locations where there is a risk of receiving head injuries from flying or falling objects and/or electric shock and burns will wear approved head protection in accordance with subsections (b) and (c).
b. When head protection is required, the employer will ensure that approved protective helmets are selected and used in accordance with their demonstrated resistance to impact and electrical hazards as specified in subsections (b)(1) and (b)(2).
    1. Protective helmets placed in service after October 30, 2004 will comply with American National Standards Institute (ANSI) Z89.1-1997 Industrial Head Protection, which is hereby incorporated by reference. The employer will ensure that the appropriate class of ANSI designated helmet is selected and used in accordance with the following:
        i. When there is no risk of head injury from contact with electrical conductors, and protective helmets are only required to reduce the danger of injury from flying or falling objects, protective helmets will be ANSI approved Class C, E, or G.
        ii. When there is a risk of head injury from contact with conductors less than 600 volts, protective helmets will be ANSI approved Class E or G.
        iii. When there is a risk of head injury from contact with conductors greater than 600 volts, protective helmets will be ANSI approved Class E.
    2. Protective helmets placed in service on or before October 30, 2004 will comply with one of the following ANSI standards, which are hereby incorporated by reference: ANSI Z89.1-1969 Safety Requirements for Industrial Head Protection; ANSI Z89.2-1971 Industrial Protective Helmets for Electrical Workers, Class B; ANSI Z89.1-1981 Requirements for Protective Headwear for Industrial Workers; ANSI Z89.1-1986 Protective Headwear for Industrial Workers -- Requirements; or ANSI Z89.1-1997 Industrial Head Protection. The employer will ensure that the appropriate class of ANSI designated helmet is selected and used in accordance with the following:

i. When there is no risk of head injury from contact with electrical conductors, and protective helmets are only required to reduce the danger of injury from flying or falling objects, protective helmets will be ANSI approved Class A, B, C, D, E, or G.

ii. When there is a risk of head injury from contact with conductors less than 600 volts, protective helmets will be ANSI approved Class A, B, D, E, or G.

iii. When there is a risk of head injury from contact with conductors greater than 600 volts, protective helmets will be ANSI approved Class B or E.

c. Each approved protective helmet required by subsection (a) will bear the original marking required by the ANSI standard under which it was approved. At a minimum, the marking will identify the manufacturer, ANSI designated standard number and date, and ANSI designated class of helmet.

d. Where there is a risk of injury from hair entanglements in moving parts of machinery, combustibles or toxic contaminants, employees will confine their hair to eliminate the hazard.

Most PPE requirements are obvious and PPE wear is so simple that training is almost unnecessary.

What is important – vitally important – is actually using the proper PPE when it is required.

To ensure employee compliance with PPE requirements, we have opted to treat all employees as intelligent, responsible persons who, when reminded of what PPE actually protects, will enthusiastically endorse PPE use.

Note: As a matter of policy, per §1510. Safety Instructions for Employees:

a. When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.

b. The employer will permit only qualified persons to operate equipment and machinery.

c. Where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.

Eye and Face Protection

Your eyes are a marvel of engineering. Most of us take them for granted as we do all our senses, until an accident, injury, or disease forces us to realize the miracle we lost or almost lost. Can you imagine a system that can take (absorb) light and convert it to electrical signals (by way of the 120 million rods and 6 million cones on the retina) and transfer these signals through an optic nerve which has about one million fibers directly into the brain?

Most of us see the world in living color and with depth perception. The body itself does much to protect the eyes. Bony eye sockets in the skull protect the eye from many mechanical injuries. Orbital fluids and tissues cushion direct blows. Eyelids close reflexively from visual or mechanical stimuli. Eyes reflexively rotate upward with the lid closing to protect the cornea. Tears can flush away chemicals and foreign bodies. We all come with these safeguards. Sometimes, they are not enough.

Eye protection is required when there is a possibility of eye injury. Eye injury is not confined to flying objects. Eye injury can be caused by bright light, dust, chemicals, heat, and, literally, anything that can reach them. Different hazards require different types of protection.

Eye (and face) protection is required when one is exposed to flying particles, chemicals, or injurious light radiation. Types of eye protection include impact resistant safety glasses, safety glasses with side shields, goggles, goggles with a face seal, face masks, and shaded goggles with varying degrees of darkness.

Affected employees who wear prescription lenses will wear eye protection over the prescription lenses without disturbing the proper positioning of the prescription lenses or will wear eye protection that incorporates their prescription into the design.

All prescription glasses should be made with impact-resistant lenses. Hardened lenses, through a tempering process, are extremely hard and resistant to impact and breakage. Safety lenses are similar to hardened lenses but are 1 mm thicker. Safety lenses are used in goggles where there is a danger of flying glass or chips of metal.

All employees who wear contact lenses must also wear appropriate eye and face protection in hazardous environments.

Welding helmets and face shields, if required, should be worn over primary eye protection (spectacles or goggles).

An inexpensive pair of safety glasses can save your priceless eyesight.

Head Protection

Talking about head protection is really talking about brain protection. Your brain, either through divine providence, evolution, or quirk of nature, is you. The brain, that soft mass of gray and white convoluted matter, is what you are all about. Destroy your brain and you no longer exist.

Your brain is naturally protected by a cranium. Your skull actually has many bones which protect your brain and support your face. Obviously, there are other parts to your head which need protecting such as your eyes, ears, nose, tongue, skin, etc., but your brain is the most important.

Head protection is required when there is a possibility of injury to the head from falling objects and when working near exposed electrical conductors which could contact the head.

Brain injury is the second most common cause of major neurologic deficits and causes more deaths than injury to any other organ.

When the skull receives an impact, it actually can indent and deform. A fracture may occur, and the fracture may be distant from the point of impact. A direct blow to the head can cause the brain to actually move within the skull. Surprisingly, there is often a reverse correlation between skull damage and brain damage. Just because there is no external visible injury to the skull does not preclude the possibility of brain injury.

Wearing head protection (a hard hat) accomplishes two major objectives: it reduces the rate of energy transfer and spreads out the area of energy transfer. Just as your head should be checked out at a hospital after a head impact, so should your hard hat. A hard hat can absorb energy by destructing and this destruction may be unnoticeable.

A head injury may occur after a blow to the head and the following symptoms may be present: unconsciousness or disorientation, confusion, nausea, vomiting, and/or double vision. Get medical help immediately. Cover open wounds lightly with sterile dressing. Keep victim still, warm, and reassured. DO NOT move the victim unless he/she would be in greater danger if you did not. DO NOT apply pressure to a head wound. DO NOT try to stop blood or clear fluid coming from ears, nose, or mouth.

Hearing Protection

Wherever it is not feasible to reduce the noise levels or duration of exposures to those specified in Table 3, below, ear protective devices will be provided and used.

Ear protective devices inserted in the ear will be fitted or determined individually by competent persons.

Plain cotton is not an acceptable protective device.

TABLE 3

Sound Level Duration per day, hours	dBA Slow Response
8	90
4	95
2	100
1	105
1/2	110

Hearing damage is caused by noise level and duration of exposure to the noise. If, after using the formula below, the equivalent noise exposure exceeds unity (1), then a Hearing Conservation Program will be initiated.

F(e)=(T(1)divided by L(1))+(T(2)divided by L(2))+ ... + (T(n) divided by L(n)) where:

F(e) = The equivalent noise exposure factor.

T = The period of noise exposure at any essentially constant level.

L = The duration of the permissible noise exposure at the constant level (from Table D-2).

If the value of F(e) exceeds unity (1) the exposure exceeds permissible levels.

A sample computation showing an application of the formula in paragraph (d)(2)(ii) of this section is as follows. An employee is exposed at these levels for these periods:

110 db A 1/4 hour.

100 db A 1/2 hour.

90 db A 1 1/2 hours.

F(e) = (1/4 divided by 1/2)+(1/2 divided by 2)+(1 1/2 divided by 8)

F(e) = 0.500+0.25+0.188

F(e) = 0.938

Since the value of F(e) does not exceed unity, the exposure is within permissible limits.

Understanding some interesting facts about your hearing will emphasize the need for hearing protection.

Your outer ears on the side of your head are the least important part of your hearing system. Should you lose your ear, you would not necessarily lose your hearing. Your outer ear, made of cartilage, includes the external auditory canal which leads to the eardrum which is only 2/5" in diameter. The eardrum separates the outer ear from the middle ear. Within the middle ear are three (3) bones commonly called the hammer, anvil, & stirrup. The stirrup (stapes) is the smallest bone in your body -- thinner than a grain of rice. Also, in the middle ear is the Eustachian tube which connects the middle ear to the back of the throat to maintain equal air pressure on both sides of the ear drum.

The inner ear, where sound waves are converted to electrical impulses, actually has a function unrelated to hearing. It contains the semicircular canals which completely control your balance. Also, in the inner ear is the cochlea, a small spiral coil in which you would find the basilar membrane which has over 15,000 hair cells. These hair cells are the end of the auditory nerve which goes directly to the temporal lobe of the brain.

The hardest bone in your whole body is the temporal bone which protects two thirds of the auditory canal and all of the middle and inner ear. Nature, itself, seems to have placed a high priority on your hearing.

Protect your hearing. If you are issued hearing protection, use it!

Foot Protection

When purchasing new protective footwear, ensure that it complies with ANSI Z41-1991, “American National Standard for Personal Protection-Protective Footwear.”

Specific hazards require specific types of protective footwear. Certain types of footwear can offer traction, crush protection, penetration protection, electrical protection, chemical resistance, heat and/or fire resistance, dryness, cushion, or ankle-protection. Further, certain activities may require a combination of these features.

Your foot is a remarkable piece of engineering which is composed of 26 bones, muscles, fatty tissue, nerves, tendons, skin and joints. The foot itself can absorb a tremendous amount of punishment without damage. But there are limits and it would be a shame to lose a foot, or part of a foot, because of failure to wear the prescribed protective footwear.

Hand Protection

Your hand is composed of 20 muscles, 3 major nerves, 27 bones (14 of which are in your fingers) plus skin, fatty tissue, tendons, & joints. There are 15 muscles in your forearm which provide power to your hand. Your hand is your gateway to the world. It lets you do what you think. Its function is feeling & grasping. Try to pick up something while holding your thumb still. It is very difficult. If the nerve to the small muscles of the thumb is severed, 80% of the total hand function is lost.

There are numerous types of hand protection (gloves) available -- each with a specific purpose. The most common are general purpose cotton work gloves which provide protection from minor skin abrasions & cold. However, there are many other types of gloves. Hands need protection from chemicals, abrasions, cuts & lacerations, temperature extremes, germs, radiation, impact, punctures, electricity, & other hazards on the job site. Specific job requirements determine the type of hand protection needed. Proper hand protection must do more than protect your hand; it must allow you to accomplish your job assignment with efficiency as well as safety.

Wearing hand protection could prevent your hand and/or fingers from being severed, burned, crushed, punctured, lacerated, cut, or generally abused.

Respiratory Protection

Employees who, by nature of their work, are exposed to harmful aerosols, vapors, gases, contaminated air, or non-breathable air will be provided air purifying or air supplying respirators after training, medical evaluation, and fit testing per our Respiratory Protection Program. The one exception is dust masks worn solely for comfort and not for respiratory protection.

Flame-Resistant (FR) Clothing

Flame-Resistant clothing will be used whenever there is a possibility of an electric arc in the work area. Employees are prohibited from wearing clothing made from material that is entirely, or blended with, synthetic materials such as acetate, nylon, polyester, or rayon.

Clothing made from 100% cotton or wool will be acceptable as long as its weight is appropriate for the flame and arc conditions present where the employees will be working. Additional guidance for FR clothing can be found at https://www.osha.gov/laws-regs/standardinterpretations/1995-08-10

Miscellaneous Personal Protection

PPE immediately brings to mind eye, head, hand, and foot protective equipment. However, there may be other types of protective equipment which are readily available, and which have the capability of protecting employees from identified hazards on the job site. Some of these items may not fall under a specific Cal/OSHA standard or may not be ANSI approved or disapproved; however, in the judgment of Zoe Robinette, they may be appropriate for use in our operations.

Summary

The true beneficiary of PPE utilization is the user. The whole thrust of this Program is to protect our employees from injury. This is accomplished by, among other things, explaining the process of hazard assessment, the reasons for PPE use, and the necessity of using the PPE selected.

Parking Concepts, Inc

Certificate of Job Site Hazard Assessment

I certify, this date, that I have performed a hazard assessment of our job sites and our methods of operations.

This hazard assessment was accomplished to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE).

Identified hazards which cannot be eliminated through engineering controls or changes in procedures will be addressed by the use of selected PPE.

All affected employees will be informed of the required PPE for specific work locations or specific types of work to be performed and will receive initial training or retraining, if necessary, before being allowed to perform work requiring PPE.

If conditions or procedures change, a reassessment will be made.

_____ _____

Zoe Robinette Date

Personal Protective Equipment

Program Administrator

Parking Concepts, Inc
Injury & Illness Prevention Program Addendum

Parking Concepts, Inc Company

Specific Safety Requirements

There also may be times when Parking Concepts, Inc requires its employees to meet safety policies that are specific to our company. If we implement these additional policies, they must have more stringent safety requirements than what CalOSHA has developed.