



Safety Manual

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Table of Contents	Page Number
Safety Policy Statement.....	4
Job Site Rules & Regulations.....	5
Responsibilities.....	6
Safety Training.....	7
Accident/Incident Investigation and Reporting Procedures.....	8
Return to Work Program.....	9
Substance Abuse Policy.....	11
Motor Vehicle Safety Program.....	12
Hazard Communication Program.....	13
Disciplinary Action	20
Vehicle Accident Program.....	22
Evacuation Procedure	23
Severe Weather Procedure	23
First-Aid Emergency Response Procedures.....	23
Fire Protection & Prevention Procedures.....	25
Safety Audit/Inspection Procedures.....	29
Ergonomics.....	30
Safe Lifting.....	31
Lockout/Tagout Program.....	32

Table of Contents(Alphabetical)	Page Number
Accident/Incident Investigation and Reporting Procedures.....	8
Disciplinary Action	21
Ergonomics.....	30
Evacuation Procedure	23
Fire Protection & Prevention Procedures.....	26
First-Aid Emergency Response Procedures.....	24
Hazard Communication Program.....	13
Job Site Rules & Regulations.....	5
Lockout/Tagout Program.....	32
Motor Vehicle Safety Program.....	12
Responsibilities.....	6
Return to Work Program.....	9
Safe Lifting.....	31
Safety Audit/Inspection Procedures.....	29
Safety Policy Statement.....	4
Safety Training.....	7
Severe Weather Procedure	23
Substance Abuse Policy.....	12
Vehicle Accident Program.....	22

Safety Manual

Safety Policy Statement

It is the policy of The Troyer Group Inc. to protect the health, safety, and quality of life of its employees. It is essential that the employees understand that management fully supports an active, effective employee safety program. The Management of The Troyer Group Inc. is committed to providing a safe and healthful work environment for all our Employees and others that may work, visit or enter our facilities and jobsites. In this Company, each Employee is very important. Our success with customers, and consequently the overall success of this business, depends upon the individual, his or her personal skills, energies and contributions. At the same time, we must be concerned and supportive of each other.

Employees are encouraged to report any unsafe work practices or safety hazards encountered on the job. All accidents/incidents (no matter how slight) are to be immediately reported to the supervisor on duty.

A key factor in implementing this policy will be the strict compliance to all applicable federal, state, local, and company policies and procedures. Failure to comply with these policies may result in disciplinary actions.

Respecting this, The Troyer Group Inc. will make every reasonable effort to provide a safe and healthful workplace that is free from any recognized or known potential hazards. Additionally, The Troyer Group Inc. subscribes to these principles:

1. All accidents are preventable through implementation of effective Safety and Health Control policies and programs.
2. Safety and Health controls are a major part of our work every day.
3. Accident prevention is good business. It minimizes human suffering, promotes better working conditions for everyone, holds The Troyer Group Inc. in higher regard with customers, and increases productivity. This is why The Troyer Group Inc. will comply with all safety and health regulations which apply to the course and scope of operations.
4. Management is responsible for providing the safest possible workplace for Employees. Consequently, management of The Troyer Group Inc. is committed to allocating and providing all of the resources needed to promote and effectively implement this safety policy.
5. Employees are responsible for following safe work practices, company rules and for preventing accidents and injuries. Management will establish lines of communication to solicit and receive comments, information, suggestions and assistance from employees where safety and health are concerned.
6. Management and supervisors of The Troyer Group Inc. will set an exemplary example with good attitudes and strong commitment to safety and health in the workplace. Toward this end, Management must monitor company safety and health performance, working environment and conditions to ensure that program objectives are achieved.
7. Our safety program applies to all employees and persons affected or associated in any way by the scope of this business. Everyone's goal must be to constantly improve safety awareness and to prevent accidents and injuries.

Everyone at The Troyer Group Inc. must be involved and committed to safety. This must be a team effort. Together, we can prevent accidents and injuries. Together, we can keep each other safe and healthy in the work that provides our livelihood.

John Leszczynski, President

Job Site Rules & Regulations

ALL EMPLOYEES WILL ABIDE BY THE FOLLOWING RULES AND REGULATIONS:

1. Employees are expected to follow all federal, state, local and company safety rules, procedures and common safety practices.
2. Immediately report all accidents, injuries, unsafe conditions, acts, tools and equipment to your Supervisor.
3. The sale, possession, use or influence of alcoholic beverages and/or illegal substances will not be tolerated.
4. The possession of firearms and other weapons is prohibited.
5. Fighting, gambling, stealing and horseplay will not be tolerated.
6. No soliciting, collecting, or accepting of contributions, dues, assessments, etc. will be allowed on company time without authorization.
7. Employees are not permitted to post, deface, or remove notices, signs, or writing on company posting areas or distribute literature of any description without authorization.
8. Use of profane, obscene, vile or abusive language to or in the presence of, other employees is not permitted.
9. Do not smoke, eat, or drink in prohibited areas or at prohibited times.
10. Never operate any machine or rotating equipment unless all guards and safety devices are in place and in proper operating condition.
11. Compressed gas cylinders must have protective caps in place and the cylinder valve closed when not in use. Cylinders must be properly secured to prevent falling.
12. A portable fire extinguisher is required to be close at hand (within 50 feet) and visible whenever flammable gases are to be used.
13. Gasoline and other flammable items must be stored and transported in approved safety cans.
14. Eye and face protection must be worn where there is a danger from flying objects or particles especially during grinding, chipping, burning and welding activities.
15. Appropriate work clothes, gloves and shoes are required. No loose clothing, tennis shoes or jewelry should be worn.
16. Good housekeeping will be practiced at all times. Work and break areas will be kept free of waste and debris.

Violations of any of these rules may be cause for immediate disciplinary action up to and including discharge. Each employee is expected to recognize what constitutes appropriate personal conduct and to act with reasonable and proper regard for the welfare and rights of the company and other employees.

Management's Responsibilities

The most important single element of effective loss control activity is the leadership and support of management. If management believes that safety is worthwhile and supports a loss control program the probability of preventing accidents is extremely great.

Directly and indirectly management's attitude is conveyed to employees and they will try to do what management wants.

Loss control should be built into business operations in the same manner as other good practices of business. Management has the responsibility for providing a safe place of employment.

Management's responsibilities in loss control are to:

1. Adopt an effective loss control safety plan.
2. Announce to employees that a loss control plan has been adopted and strongly urge that all employees support the program to reduce accidents. This can be a letter or memo to all employees stating positively your support of loss control
3. Actively support the plan by personally following safe practices and encouraging others to do so. Employees will follow the example set by management. For instance, in areas where smoking is prohibited, management as well as others should not smoke.
4. Assume direct responsibility for loss control or appoint an individual who will be responsible for successful operation of the program.
5. Provide employees with safe tools and equipment to do the required job.
6. Periodically review accident records to determine if the loss control plan is effective.
7. Periodically review progress and reemphasize your support of the program.

Management will maintain all necessary medical records for an employee for thirty (30) years after the duration of the employment.

Acting Safety Officer's Responsibilities

In order for safety to be effective, one person must be assigned full responsibility for safety activity. The person assigned safety responsibility should be given the authority to carry out the safety program.

Accidents take no time off. There must be someone continually alert to hazardous conditions and correct them ASAP.

The duties and responsibilities of the safety officer are:

1. Formulates, administers, and makes necessary changes in the accident prevention program.
2. Makes regular monthly reports to management of the safety process.
3. Maintains accident record system, makes accident report, investigates accidents, and checks to see corrective action is taken.
4. Assists in training employees in safety.
5. Makes personal safety inspections and supervises safety inspections made by safety committees and others for the purpose of discovering and correcting unsafe work practices before they cause accidents.
6. Make certain that federal, state, and local laws or ordinances are complied with.
7. Initiates and conducts activities that will stimulate and maintain the interest of employees in safety.

Supervisor's Responsibilities

Supervisors have an important role for loss control in their areas. The supervisors are indispensable to effective loss control, for they have immediate contact and control in their areas.

In the final analysis, the program succeeds or fails according to the interest and efforts that the supervisors put forth. If the supervisors show attitudes and manner of conduct that they are in support of loss control, they will convince their employees that it is a necessary part of their work and will win their support for it. Supervisors should understand their responsibility for safe working conditions and safe work practices in their departments.

Supervisor's loss control responsibilities and duties are to:

1. Select employees who are mentally and physically qualified for the work, which they are to perform.
2. Give detailed instructions as to job performance and explain hazards and safety precautions in assigning workers to jobs.
3. Provide workers with safe tools and equipment to perform their jobs.
4. Check to see that protective equipment, such as eye protection, is used where required.
5. Plan work to see that the workers, materials, and equipment are available to perform the job safely.
6. Actively participate in loss control promotional activities.
7. Personally supervise all hazardous work or work that is new and unusual.
8. Regularly inspect and maintain physical properties to insure that good housekeeping practices are followed and that mechanical failures do not occur.
9. Personally investigate all accidents and correct any unsafe practices or conditions to prevent reoccurrence.
10. Constantly observe work procedures in order to detect and correct any unsafe practices and conditions and develop improved methods.
11. Promptly report accidents occurring in their departments.
12. See that the injured workers promptly receive first aid or medical treatment.

Employee's Responsibilities

The Williams-Steiger Occupational safety and Health Act of 1970 requires "that every employer covered under the Act furnish to his employees employment and a place of employment which are free from recognized hazards that are causing or likely to cause death or serious physical harm to his/her employees." The Act also requires "that employees comply with standards, rules, regulations and orders under the Act which are applicable to their own actions and conduct.

Employee responsibilities for safety include the following:

1. Follow all safety rules and regulations.
2. Wear appropriate safety equipment as required.
3. Maintain equipment in good conditions with all safety guards in place when in operation.
4. Report all injuries, no matter how minor immediately to a supervisor.
5. Encourage co-workers to work safely.

Employees are responsible for following all rules and regulations as they are stipulated by controlling entities of worksites.

Employees are expected to come to work in appropriate attire with all required Personal Protective Equipment.

Safety Training

All new employees must complete a Safety Orientation before they will be allowed to work. New employees will receive a copy of the company safety manual and a supervisor will review it with each new employee to familiarize them with job specific hazards and company protocols. The safety manual must be kept available at all times. In addition, new employees must complete 2 online courses (Construction Safety Orientation and Personal Protective Equipment). “Short Call” employees will be allowed to work immediately, but will be required to work with another TTG employee who is knowledgeable about the hazards and can instruct the new employee about how to avoid hazardous situations and conditions. In essence, this will be on the job safety orientation. “Short Call” employees who stay for an extended period will complete the normal process.

In addition to safety orientation, employees will complete the following safety training according to the following schedule:

- Complete/Attend (1) Employee Safety Training per month.
- Employees must complete Personal Protective Equipment training once a year in the Spring

The records of these, and all other training will be kept for a minimum of three (3) years from the date on which they are completed.

Accident/Incident Investigation and Reporting Procedures

Injuries / Immediate Treatment Not Required

Report all injuries immediately to Supervisor
Supervisor is to report injury to the Safety Department immediately
Supervisor is to fill out an accident report and review it with employee and then send to our Safety Department within 24 hours
If possible, take pictures as part of the investigation.

Injuries / Minor Injury Requiring Treatment

Report all injuries immediately to Supervisor
Supervisor is to report injury to the Safety Department immediately
(You will receive direction on where to go for treatment)
Supervisor is to fill out an accident report and review it with employee and then send to our Safety Department within 24 hours
If possible, take pictures as part of the investigation.

Injury / Requiring Immediate Emergency Treatment

Call 911 for Assistance
“DO NOT HANG UP UNTIL OPERATOR DIRECTS YOU TO”
Report immediately to Supervisor
Follow procedures from 1st aid/CPR training.
Supervisor is to report injury to the Safety Department Immediately
Supervisor is to fill out an accident report and review it with employee and then send to our Safety Department within 24 hours
If possible, take pictures as a part of the investigation

Accidents / Vehicle and Equipment

Report immediately to Supervisor
Report all accidents to our Safety Department immediately
Take pictures as part of the investigation
Supervisor is to make sure all of the pictures and documents are collected while onsite
Supervisor is to fill out an accident report and review it with employee and then send to our Safety Department within 24 hours

“USE COMMON SENSE”
Safety Department: 574-272-9814

Doug Grall	ext: 1017	Cell: 574-276-5457
Kirsten Byler	ext: 1009	Cell: 574-520-0477

OSHA Inspection

When an OSHA Inspector arrives on your jobsite call your Supervisor immediately. A Supervisor will accompany an OSHA Inspector during the jobsite inspection.

The following forms and procedures shall be used:

Accident Report: All accidents/incidents must be recorded on the The Troyer Group Inc. Accident/Incident Report form. This report shall be forwarded to the Safety Director and Human Resources Department.

First Report of Injury (State Workers' Compensation Report): For all cases requiring medical attention, this report shall be filed in accordance with applicable state laws. Human Resources Department will file appropriate state forms with Workers' Compensation insurance carrier.

Property Damage Report: All accidents/incidents must be recorded on the The Troyer Group Inc. Accident/Incident Report form.

Accident investigation is of prime importance in the accident prevention program. Its chief purpose is to determine the cause of the accident so that recurrences can be prevented. An accident is an indication that some hazard, exposure, or condition needs correction if a future accident is to be prevented.

Return to Work Program

A Return-To-Work (RTW) program is intended to help employees get back to work as soon as they are able, following an injury or illness.

The Troyer Group Inc. has implemented a RTW program that is intended to bring employees back to work as soon as they are physically able, to perform work that is meaningful, without aggravating their injury or illness.

Return-To-Work has many benefits for the employee. It helps reduce the financial burden of being out of work, it often helps in the healing process by keeping the employee physically and mentally active, and it keeps the employee connected to their friends and coworkers. Therefore, The Troyer Group Inc. will do its best to arrange temporary alternate or modified (aka "transitional duty") assignments whenever possible, for employees who are ill or injured.

Elements of a Return-To-Work Program

An effective RTW program consists of the following criteria:

- Use of Medical Provider Network, whose members utilize return-to-work principles
- Numerous potential "transitional duty" tasks
- A Coordinated team approach among The Troyer Group Inc., the employee, and the medical and insurance provider
- Training of Troyer Group employees on the elements of the RTW program

Return-To-Work Coordinator

The Return-To-Work Coordinator (RTWC) is an employee of The Troyer Group Inc. responsible for developing and maintaining a list of transitional duty jobs and their physical requirements. The RTWC will also maintain frequent communications with the injured or ill employee, and the medical and insurance providers. In addition, the RTWC will train employees in their responsibilities under the RTW program.

The Safety Director is the RTWC and is responsible for all aspects of The Troyer Group Inc. Return-To-Work Program. The RTWC will:

- Maintain the Return-To-Work program, and related records and forms, up-to-date
- Make sure the First Report of Injury forms are completed and sent to the appropriate parties

- Locate and use members of Medical Provider Network
- Give the medical provider information on the physical requirements of the employee's job and potential alternate or modified transitional duty assignments
- Maintain contact with the injured employee on a regular basis
- Work with the physician to develop a transitional duty work plan
- Communicate frequently with the medical and insurance providers
- Train employees on The Troyer Group Inc. Return-To-Work program

Employee Responsibilities

Supervisors employed at The Troyer Group Inc. are responsible for ensure that:

- Anyone who is injured receives prompt medical attention
- They contact the injured employee on a regular basis
- The RTWC is made aware of all injuries and illnesses
- The RTWC has assistance needed to develop a list of transitional duty jobs that employees with medical work restrictions can perform
- There is a positive work atmosphere and environment where the returning employee feels welcome
- Anyone returning to work does their job (or an alternate job) within limitations established by the physician

All employees play a critical role in the success of the RTW program because they have the best understanding of the requirements of their jobs.

All employees of The Troyer Group Inc. will:

- Report all injuries and illnesses immediately
- Follow all The Troyer Group Inc. protocols for safety and health
- Assist the RTWC in completing necessary forms
- Stay in touch with the RTWC on a regular basis if they become injured
- Follow the physician's directives, never working beyond medical restrictions
- Take part in the RTW training that is provided by the RTWC

Physical requirements and Transitional Duty

The RTWC will develop an analysis of the physical requirements of each job function, to be given to the injured employee's treating physician if and when an injury occurs. The RTWC will also develop a bank of jobs of transitional duty assignments for employees who are recovering from an injury of illness.

It is the policy of our company to provide meaningful work activity for all employees who temporarily become unable to perform all, or portions, of their regular work assignments due to work-related or non-work-related injury or illness. By providing temporary restricted work activity, injured employees remain an active and vital part of the company. Please refer to the The Troyer Group Inc. Employee Handbook for policy details.

When an Injury or Illness Occurs

The Troyer Group Inc. will assure that prompt medical attention is provided to anyone who is injured. If feasible in the event of serious injuries, the employee's supervisor should accompany them to their initial medical treatment.

Each case will be managed carefully, with the goal of bringing the employee back to work as soon as they are physically able, without aggravating the injury or illness.

The physician is responsible for establishing work restrictions, if any. The Troyer Group Inc. will provide transitional work assignments that are within the restrictions established by the physician. Removal from work will be avoided whenever possible.

The RTWC will take a proactive approach to providing the physician with the following information once an injury occurs:

- The injured employee's job title and job responsibilities
- A list of alternate or modified transitional duty jobs that could be performed
- Attending Physician's Report: Return to Work Recommendations form or State equivalent (The employee should be asked, if possible, to bring this form with them when they receive medical treatment.)

The medical provider or treating physician may tour The Troyer Group Inc. to become familiar with the physical requirements of the jobs being performed, and to be better able to recommend transitional duty assignments for injured or ill employees.

Once medical treatment has been provided, the RTWC should obtain the following from the treating physician:

- Jobs or work assignments that the employee is capable of performing
- Tasks that the employee is restricted from performing
- Length of time restrictions are recommended to be in place
- A treatment schedule that includes dates for any follow up treatment(s) and/or physical therapy/rehabilitation
- Written acknowledgment that the physician has explained restrictions to the employee and provided the employee with a copy
- Estimated date the employee should be able to return to normal duties

It cannot be overemphasized that the injured employee must be monitored, to assure they work within the restrictions recommended by the treating physician. Employees may feel well enough to return to their regular responsibilities, but can risk further injury or could prolong the length of transitional duty by doing so. If the employee wishes to exceed physical restrictions, a release must be obtained from the physician.

Substance Abuse Policy

It is the official policy of The Troyer Group Inc. that employees and affiliates will not be allowed to work under the influence of illegal substances. Drug testing will be completed in cases with Reasonable Suspicion. Employees and associates are prohibited from possessing, distributing, or using controlled substances while on company premises, while on company time, or while performing company tasks. Any person found not in compliance with this policy will be subject to disciplinary action, up to and including termination, at the discretion of leadership personnel involved in disciplinary decisions.

Motor Vehicle Safety Policy

Preventative Maintenance:

To retain the safety and integrity of the vehicle, **The Troyer Group Inc.** will provide the necessary resources to ensure all vehicles are operating at their best. All routine motor vehicle maintenance will be done according to the manufacturer's specifications. Critical components that must always be maintained and promptly repaired are; brakes, tires, suspension, steering, lights, mirrors, windows, and windshield wipers.

Employees are required to conduct pre trip vehicle inspections. Any unsatisfactory result requires a Fleet Hazard Identification form to be completed and forwarded to their immediate supervisor. Thereafter, the identification form will be forwarded to your supervisor to confirm the equipment malfunction, complete repairs, and sign off on the completed identification form.

Safe Use of Company Vehicles:

Personal use of company vehicles is prohibited without prior permission from management. If permission is granted, the employee assigned to the vehicle will be the only driver allowed to operate the vehicle. Use of the company vehicle is limited to travel to and from work and work related events. The vehicle is not to be used for personal and/or entertainment purposes. Employees are expected to use their discretion.

Once again, our goal is to provide a safe working environment for all employees by protecting employees and Company property. Drug/Alcohol Testing is required as identified and detailed in the The Troyer Group Inc. Employee Handbook.

I. At all times when driving company vehicles, drivers are required to obey all rules of the road and traffic regulations. Driving of company vehicles is to be done defensively, with reserve and caution, never recklessly or aggressively. This includes the regulation requiring any driver to hold a current, valid driver license appropriate for the vehicle being driven.

II. Seat belts must be worn at all times when driving or riding in a company vehicle.

III. Employees who take company vehicles home with them are held to the highest expectations for the care of the vehicles. You must make every effort to maintain the vehicle in good condition and repair, and to report any matters needing mechanical, maintenance or repair service or which could impair the safe and proper operation of the vehicle, to your supervisor immediately upon becoming aware of the problem.

No employee may alter a company vehicle in any manner without prior written consent of your Supervisor, including but not limited to: removal or deactivation of any equipment or device, installation of specialized equipment, customizing, affixing of signs, decals or stickers, painting, etc.

Depending on the circumstances of the damage or loss of property, The Troyer Group Inc. reserves the right to hold you responsible for any or all of that expense.

IV. The following guidelines for use of company vehicles should be observed without exception:

- A. The company vehicle may be driven ONLY by the company employee to which it has been assigned (other than in the event of an emergency in which life or property is eminently in danger). The employee's spouse may also be granted permission to drive the company vehicle infrequently, subject to compliance with FCRA requirements to grant permission to The Troyer Group Inc. to obtain and review his/her Motor Vehicle Report (MVR) and subject to favorable results of the MVR review in accordance with Commercial Insurance driver insurability guidelines (guidelines available for review).
- B. Youthful drivers (under age 18) are strictly prohibited from driving company vehicles.
- C. Child safety seats may only be used in the rear seat of any THE TROYER GROUP INC. vehicle. Children requiring child safety seats in accordance with State Law may not be transported in any THE TROYER GROUP INC. truck.
- D. Company vehicles shall never be used haul personal property in excess of that which could be contained within a normal private passenger vehicle luggage trunk.

Hazard Communication Program

PURPOSE: To provide a safe and healthful workplace for all The Troyer Group Inc. employees and to ensure that the hazards of all chemicals used or handled are communicated to employees, and others, that may be exposed either through routine handling, or as a result of a foreseeable emergency. This communication shall be accomplished through container labeling, material safety data sheets and/or safety data sheets, and appropriate information and training programs.

POLICY: The Troyer Group Inc. maintains a safe and healthful workplace and will ensure that employees receive training in chemical exposure recognition, the physical and health hazards of the chemicals in the work area, measures that they can take to protect themselves from chemical hazards, and training in locating and obtaining safety data sheets for all hazardous chemicals at the facility.

Hazard Communication Program Coordinator: Safety Director

Employee Rights under the Hazard Communication Standard

- The requirements of the Hazard Communication Standard.
- Operations in their work area where hazardous substances are present.
- The location of the written Hazard Communication Program, the list of hazardous substances, and the required SDS file.
- To have labels present on containers of hazardous chemicals.
- To have access to Safety Data Sheet (SDS) for each hazardous chemical stored in your workplace.

- To receive training & information required by the Hazard Communication program.
- To be provided with access to the written Hazard Communication Program.

Employee Responsibilities

- It is essential for each affected Troyer Group Inc. employee to participate in the Hazard Communication program to ensure its success. Each employee should:
 - o Be alert to potential hazards of all hazardous chemicals in the workplace.
 - o Consult the safety data sheet (SDS) for specific chemical information.
 - o Read product labels.
 - o Become familiar with the written Hazard Communication Program and pictogram labels.
 - o Follow safe work practices established to protect their health and safety.
 - o Individual employees are responsible for maintaining the labels on the containers, including, but not limited to, tanks, totes, drums, secondary containers, and for training their employees on the hazards listed on the labels in the workplace.

Emergencies Involving Hazardous Chemicals:

Spills or accidental releases of hazardous chemicals must be reported at once to a supervisor. In the event a release of hazardous chemicals occurs because of a broken or spilled container, or other incident, employees not trained in small spill cleanup procedures will be instructed to evacuate the affected area.

Employees that have received training in small spill cleanup procedures will, under the guidance of their supervisor, absorb, neutralize, or otherwise control spills of hazardous chemicals that occur in the immediate release area.

In the event a spill or release occurs that is beyond the capability to control through absorption or neutralization, all employees will be instructed to evacuate the immediate work area. Assistance in controlling and cleaning up the spill will be summoned from outside sources according to the company's emergency action plan.

Hazard Communication Standard

Chemicals in the Workplace

The Troyer Group Inc. handles, uses, or has employees who are exposed to products that contain potentially hazardous chemicals. Knowledge of the potential hazards of these materials is critical in order to understand the proper storage, use, and handling methods, as well as understanding what to do in the event of spills.

The federal OSHA Hazard Communication Standard was established to provide information about chemical products handled in the workplace so that employees are aware of their potential hazards and informed

of the necessary safe handling procedures and work practices. The goal of the Hazard Communication Standard is to reduce illnesses and injuries caused by overexposure to chemicals in the workplace.

The Standard requires that all chemical products be evaluated by the manufacturer and that hazard information be made available to employees through the uses of warning labels and pictograms, Safety Data Sheets, and employee training.

Hazard Evaluation

Chemical manufacturers are required to review the available scientific data concerning the hazards of the chemicals they produce, and to communicate this information to employers that distribute or use their products. Each chemical product is to be evaluated for its potential to cause adverse health effects (caused by irritants, corrosives, sensitizers, etc.) and its potential to pose physical hazards (caused by flammable materials, compressed gases, oxidizers, etc.).

Written Hazard Communication Program

The Hazard Communication Standard requires employers to develop, implement, and maintain at the workplace, a written, comprehensive hazard communication program. The program must include requirements for container labeling, SDS, lists of chemicals in the work area, and employee training.

Safety Data Sheets (SDS)

The Troyer Group Inc. maintains a listing of all hazardous chemicals and ensures safety data sheet (SDS) are available for each hazardous chemical present at the facility, including solvents, paints and various chemicals. The SDS will be maintained in an electronic database accessible to all employees. The hazard communication program coordinator is responsible for ensuring that the database of SDS's are maintained as items containing hazardous chemicals are added or deleted from the list. All MSDS will be updated as required for compliance with the new Globally Harmonized System (GHS).

It is the responsibility of the The Troyer Group Inc. representative(s) who purchases supplies and materials for the company to ensure that a safety data sheet is obtained and distributed for all products that contain a hazardous chemical. No new supply or material is to be purchased without first obtaining a material safety data sheet.

How to Obtain a Copy of an SDS

The Troyer Group Inc. maintains copies of SDS for all products that contain a hazardous chemical or chemicals which are maintained in the facility database. Employees may request a copy of an SDS at any time; all The Troyer Group Inc. employees have unrestricted access to such information from any worksite.

Manufacturers of the products that require a material safety data sheet will supply revised SDS. The The Troyer Group Inc. hazard communication program coordinator will remove the outdated MSDS and insert the updated SDS. The coordinator will also ensure that safety data sheets are obtained and placed in the database as new products are added to inventory or purchased for use.

How to Read an MSDS and SDS

The SDS is the heart of the Hazard Communication Program. It is each employee's responsibility to know when to consult an SDS, how to read and interpret the information it contains, and how to locate the SDS information at the work place. If an employee is not sure, he/she must consult the The Troyer Group Inc. hazard communication program coordinator.

When to Consult a SDS

- Before handling any hazardous material
- When there are specific questions about a hazardous material that is handled
- In case of an emergency involving a hazardous material
- To answer questions concerning proper storage and handling of any hazardous material

Chemical manufacturers must develop a Safety Data Sheet (SDS) for each hazardous substance they produce and must provide the SDS automatically at the time of the initial shipment of a hazardous chemical to a downstream distributor or user, and anytime, thereafter, that there is a change. This SDS must follow a standard 16 Section format shown below. Since the SDS is the primary source of this chemical safety information, the SDS must be accessible by all employees at any time it is needed.

Under GHS, SDSs are presented in a 16 section format with a required ordering of sections. It is essentially the ANSI Standard for SDSs, with a few minor tweaks.

The sections, in order, are as follows:

1. Identification	9. Physical and Chemical Properties
2. Hazard Identification	10. Stability & Reactivity
3. Composition/ Ingredient Information	11. Toxicological Information
4. First-aid Measures	12. Ecological Information
5. Fire-Fighting Measures	13. Disposal Considerations
6. Accidental Release Measures	14. Transport Information
7. Handling and Storage	15. Regulatory Information
8. Exposure Control/ Personal Protection	16. Other Information

To be GHS compliant, an SDS needs all 16 sections; however, OSHA will not be enforcing sections 12-15, which fall outside their jurisdiction.

Hazardous Ingredients

The Hazardous Ingredients section lists the names of all hazardous components of the substance. This section also includes exposure limits that indicate the concentration to which a person can safely be exposed.

Physical Data

The Physical Data section describes physical properties of the substance, such as boiling and freezing points, vapor density and pressure, specific gravity, solubility, percent volatile, and appearance and odor.

Fire and Explosion Data

The Fire and Explosion Data section identifies the fire hazards of a substance and any conditions that could contribute to, or result in, a fire or explosion. Appropriate extinguishing agents and approved firefighting methods are also listed.

Health Hazard Data

The Health Hazard Data section includes health hazards associated with the substance including routes of exposure, signs and symptoms of acute and chronic overexposure, cancer causing properties that the material may have, toxicity information, and medical conditions that can be aggravated by exposure. Many of the terms used in this section are explained in the following pages of definitions.

First Aid Procedures

The Health Hazard Data section often also contains emergency and first aid procedures if overexposure to the chemical occurs.

Reactivity Data

The Reactivity Data section identifies materials with which the substance is incompatible, hazardous decomposition products that can be produced, such as carbon monoxide and carbon dioxide, and conditions to avoid. This information is useful in determining what products should not be stored, shipped, or packaged together.

Spill, Leak, and Disposal Procedures

The Spill, Leak, and Disposal Procedures section summarizes the steps to be taken in the event the material is released or spilled. It may also identify what materials to use when neutralizing, absorbing, and cleaning up spills of hazardous chemicals. This section also identifies appropriate waste disposal methods. Hazardous waste must be disposed of according to federal, state and local regulations. Spill cleanup material and expired or damaged chemicals, and their containers should never be placed in the trash or flushed/ poured down any drain.

Special Protection Information

The Special Protection Information identifies any special protective equipment that should be used or worn when using. It also describes any special ventilation that should be used when working with the chemical. This information should be consulted when using the chemical or preparing to clean up a release or spill involving the material. However, this information does not apply to handling sealed containers.

Special Precautions

The Special Precautions section contains information to consider when handling and storing the hazardous chemical. This information should be consulted whenever questions arise as to the proper storage conditions and location.

Container Labeling:

GHS safety labels must have six standardized elements:

1. Product Identifier – Must match product identifier on the safety data sheet
2. Manufacturer Contact Information – Including name, phone number, and address
3. Hazard Pictograms – New label elements that may require color printers
4. Signal Word – Either DANGER or WARNING depending upon hazard severity
5. Hazard Statements – Standardized sentences that describes the level of the hazards
6. Precautionary Statements – Steps employees can take to protect themselves

With GHS alignment, each container of a classified hazardous chemical is to be labeled, tagged, or marked with the following elements:

1. Product or chemical identifier clearly indicated on the label that matches the product or chemical identifier on the SDS.
2. Contact information for the product supplier, including the company name, address and telephone number.
3. Hazard Pictograms. Pictograms have a black symbol on a white background with a red diamond frame. (See some examples below)
 - a. OSHA requires a red frame around the pictogram to be used regardless of whether the shipment is traveling inside or outside of the country.
4. The signal word should be clearly marked at the top of the label beneath the product identifier. GHS permits the use of only two signal words (and only one at a time)—DANGER or WARNING—to emphasize the hazard and distinguish between hazard levels.
5. A hazard statement that describes the level of hazard should appear under the signal word. Signal words, hazard statements and pictograms have all been harmonized and assigned to each hazard class and category in GHS.
6. Lastly, the label should include the appropriate precautionary information. .

Keep in mind these requirements are for classified hazards. For unclassified hazards, the shipping label should include the product name, supplier contact information, and as supplemental information, a description of the hazards and appropriate precautionary measures.

Workplace Labeling

- The Troyer Group Inc. requires all hazardous chemical containers to be labeled with the information marked by the manufacturer of the chemical at the time of purchase.
- Labels must not be defaced or removed unless immediately replaced with new labels.

Non-Routine Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, their supervisors will inform them about the chemicals' hazards.

Their supervisors also will inform them about how to control exposure and what to do in an emergency. The employer will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment all additional training as required.

Examples of special tasks that may expose employees to hazardous chemicals include the following include battery topping off.

Informing Outside Contractors

If employees of other employer(s) may be exposed to hazardous chemicals at The Troyer Group Inc. (for example, employees of a construction contractor working on-site) It is the responsibility of Hazard Communication program coordinator to provide contractors and their employees with the following information:

- The identity of the chemicals, how to review our Safety Data Sheets, and an explanation of the container labeling system
- Safe work practices to prevent exposure

The Hazard Communication program coordinator will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace.

Employee Information & Training:

Training

Employees may be exposed to potentially hazardous substances during handling or use. The Troyer Group Inc. wants to be sure that they know what to do when handling these materials.

Each employee will, initially upon hiring, annually thereafter and more frequently as needed, receive training covering chemical safety and hazard communication. This training may consist of the viewing of a videotape, presentation by the operations manager and human resource or review of training materials at the end of this

procedure or other training materials, and signing of a form acknowledging completion of hazard communication training. The employee training plan must consist of the following elements:

- How to read and interpret information on labels and the SDS.
- The hazards of the chemicals employees work with.
- Measures employees can take to protect themselves against the hazards.
- Specific procedures adopted by The Troyer Group Inc. to protect employees.
- Methods and observations to detect the presence of a hazardous substance.

Specifically through supplementary training, employees will receive training in the following:

- The requirements of the Hazard Communication Standard, including the new GHS elements.
- Label Pictograms
- The location and availability of the written policy and program.
- The location in the work area where hazardous materials are present.
- Training in methods that may be used to detect the presence or release of a hazardous chemical in the work area.
- Explanation of the potential physical and health hazards of chemicals used and stored in the work area.
- Measures that the employees can take to protect themselves from the hazards of chemicals in the work area.
- Specific actions that employees are to take in the event of an emergency leak or spill of chemicals used at the work project.
- Hazardous chemical labeling system, sections of the SDS, explanation of the terminology used on the SDS, how to obtain the SDS, and how to request a printed copy of the SDS.

The The Troyer Group Inc. Hazard Communication program coordinator will oversee the training to ensure the employee understands the information presented and to answer any specific questions the employee may have.

Disciplinary Action

PURPOSE AND SCOPE

This procedure provides the guidelines to support good safety performance through the use of adequate disciplinary measures designed to eliminate occasional or continuous safety violations.

This procedure applies to all Troyer Group employees and facilities.

PROCEDURE

General

Each employee shall be given a safety orientation. The Safety and Health Plan will be explained and safety responsibilities clearly identified.

- a. The Disciplinary Action Procedure shall be explained to each employee during the safety orientation.
- b. Prior to the assignment of each job assignment or task, the Supervisor shall brief the employee on the tasks to be performed. The briefing will encompass the individual's safe position and action, proper use of correct tools and safety equipment, and an assigned safe method of performing the work.
- c. Each person supervising work will be responsible for coordinating work with other supervisors in the work area to ensure that all tasks can be accomplished safely.

Specific Requirements

The following steps shall be administered in a fair and nondiscriminatory manner. All disciplinary actions, including instruction for improvement of an individual, shall be documented in that individual's personnel file. This disciplinary procedure is designed to be progressive in nature and disciplinary action taken shall be based upon violations documented during the 3 year period prior to the issuance of any Disciplinary Notice.

- a. Supervisors are responsible for ensuring that every employee receives instruction regarding the safe performance of their duties. Instruction shall encompass all recognizable risks associated with the work and shall be clearly understood by the employee. Additionally, every employee shall understand that disregarding safety instructions or rules may result in disciplinary action up to and including discharge.
- b. *1st Offense* – The first violation of a safety rule, procedure or work practice shall be promptly corrected. If necessary, retraining shall be accomplished. A written warning shall be issued by the employee's immediate supervisor with copies issued to (1) the individual, (2) the Personnel Office. The supervisor will/must retain a copy in his local personnel file.
- c. *2nd Offense* – The second safety violation committed will incur a Written Warning and Remediation to be determined by the Safety Director.
- d. *3rd Offense* - A third safety violation committed within a 3 year period will be cause for a suspension of up to three (3) days without pay. The local manager and employee must formulate a safety action plan for the employee to abide by as well as documented safety retraining. The safety action plan must be signed by both the local manager and the employee.
- e. *4th Offense* – A fourth safety violation committed within a 3-year period will result in the employee record to be presented to the Executive Safety Committee for reviewal. The Executive Safety Committee will make decisions based on history, severity, and frequency of safety violations.

f. *Immediate Termination* –Troyer Group recognizes that violating certain safety procedures could result in serious injury or death. As a result, an employee may be immediately terminated for violating the following safety procedures:

1. Entering a confined space without testing for a hazardous atmosphere.
2. Knowingly violating any Fall Protection Procedure.
3. Any safety violation that willfully places another individual at risk of serious injury or death

Other Requirements

Employees, who intentionally or unintentionally violate safety rules, thereby being responsible by their actions for incidents causing personal injury, death, or damage to property or the environment, may be suspended from employment pending the outcome of a full investigation of the incident. The results of the investigation will be a factor in determining whether the individuals involved will be terminated for cause, disciplined otherwise, or returned to regular work status.

Vehicle Accidents

The Troyer Group Inc. realizes some accidents are unpreventable. Drivers should seek medical attention immediately, if necessary. Supervisors and drivers are required to be trained in post-accident procedures to secure the details of the accident and document the damage. Providing detailed facts of the accident will help our insurance carrier deter fraudulent third party insurance schemes.

1. Drivers are required to document all details of the accident; traffic flow, speed limits, stop lights/signs, weather conditions, citations issued, etc. Pictures should be taken to document the extent of damage to all vehicles involved.
2. Once this information is secured, the driver is to report all accidents immediately to supervisor. If the vehicle is inoperable, arrangements need to be made for towing and delivery of cargo. Hazmat operations, containment, and clean up will be coordinated by supervisor and/or driver.
3. Supervisor is to complete Vehicle Accident Checklist (Appendix A) within 24 hours of the incident

Accident/Incident investigations shall be conducted as follows:

1. The Supervisor shall investigate all accident/incidents requiring first aid, medical care, property damage or vehicle accidents.
2. The investigation shall include a discussion with the employee and other employees who may have been witnesses.
3. The Supervisor shall determine the cause of the accident/incident, take corrective action, and prepare a written report. The written report should avoid general terms and clearly state the specific cause of the accident.
4. Management and the Supervisor shall review accident/incident reports and insure that prompt corrective action has been taken.

5. The Supervisor shall follow up to insure compliance with company policies and to offer such advice and assistance as he can.

Evacuation Procedures

When an evacuation alarm is sounded, all employees not pre-assigned to the emergency force are to immediately evacuate the building/area.

1. Walk; do not run, to the nearest exit.
2. Assemble in area(s) pre-assigned by the **Supervisor** for a head count.
3. Everyone is to remain in the assembly areas until the head count is completed and your supervisor releases you or gives you further instructions.
4. No one is to interfere with the client's or **Supervisor's** emergency organization or with public emergency forces during the execution of their respective functions.

Severe Weather Procedures

In the event of a "tornado warning," (a tornado is imminent in the area), a decision will be made if and when a "take shelter" order will be given.

When the "take shelter" order is sounded, all company personnel will move immediately and in an orderly manner to designated shelter areas.

All company personnel will remain in the shelter areas until the "all clear" message is given.

Each shelter area will be under the direct and complete authority of the **Supervisor**.

First-Aid Emergency Response Procedures

The following information is given for primarily self-help. In the event of an injury to you or a fellow team member always seek trained, certified assistance.

GENERAL DIRECTIONS FOR GIVING FIRST-AID:

1. Keep the injured person lying down.
2. Do not give liquids to the unconscious.
3. Control bleeding by pressing on the wound.
4. Restart breathing by giving mouth-to-mouth artificial respiration.
5. Dilute swallowed poisons.
6. Keep broken bones from moving.
7. Cover burns with thick layers of cloth.
8. Keep heart attack cases quiet.
9. For someone who has fainted, keep head lower than heart.
10. Cover eye injuries with a gauze pad.
11. **ALWAYS SEEK MEDICAL ATTENTION.**

First-Aid Emergency Response Procedures

Most often you'll run up against smaller injuries – burns, nicks, cuts, and scratches. The danger here is in the fact that most people don't bother to get first aid for these minor injuries. But unless they are properly treated, these little injuries can develop into serious infection cases. Remember the old adage about a stitch in time. Work carefully – but if you do get hurt or someone else gets hurt, get expert attention as soon as you can. Time is often very important.

When any injury occurs – serious or minor – be sure that it receives the right kind of treatment, as early as possible.

IN CASE OF A TRUE EMERGENCY the following procedure should be performed in the order listed:

1. Survey the scene.
2. Do a primary survey of the victim.
3. Phone the emergency medical services (EMS) system for help.
4. Do a secondary survey of victim.

1. SURVEY THE SCENE

When you hear a call for help, there are certain things that you should do. As you approach the victim, take in the whole picture. Don't look only at the victim. Take a look all around the victim. This should take only a few seconds and should not delay your caring for the victim. Here are the things you should be looking for:

- A. Is the Scene Safe?** Is the area safe enough for you to approach the victim? For example, is there an exposed electrical wire? Are there harmful fumes? Is there danger from traffic? Once you reach the victim, decide if it is safe for you and the victim to stay where you are. Unless you or the victim is in immediate danger from a hazard at the scene, **don't move the victim.**
- B. What Happened?** What actually happened? Look around for clues that could tell you the type of injuries the victim might have. The scene itself often gives the answers. If a person were lying next to a ladder, you would suspect that he/she fell off the ladder and may have broken bones. An electrical wire on the ground next to the victim might mean that the victim is unconscious and cannot tell you what is wrong, and there are no bystanders to give you information.
- C. How Many People Are Injured?** Look beyond the victim you see at first glance. There may be other victims. One person may be screaming in pain while another, more seriously injured, may go unnoticed because he/she is unconscious. In an auto accident, car doors that are open can mean there are more victims nearby who were thrown out of or walked from the car.
- D. Are There Bystanders Who Can Help?** If there are bystanders, use them to help you find out what happened. Maybe someone saw the victim fall. If bystander knows the victim, ask if the victim has any medical problems. This information can help you figure out what is wrong with the victim. Bystanders can also be used to call for help and to control traffic.

2. DO A PRIMARY SURVEY

The primary survey is a series of checks to find conditions that are an immediate threat to the victim's life. When you do a primary survey, you are checking the condition of the body's two most vital systems, - the respiratory system and the circulatory system.

This is done by checking the ABC's:

A = Airway

B = Breathing

C = Circulation

3. PHONE THE EMERGENCY MEDICAL SERVICES (EMS) SYSTEM FOR HELP.

4. DO A SECONDARY SURVEY

The secondary survey of a victim is a series of checks for injuries or other problems that are not an immediate threat to life, but which could cause problems if not corrected. For example, during the secondary survey, the rescuer may find that the person has a broken bone. This may not be immediately life threatening, but could become a serious problem if ignored.

The secondary survey has three parts:

1. Interviewing the victim.
2. Determining if breathing, pulse, and body temperature are normal.
3. Checking the person from head to toe, looking for injuries.

All The Troyer Group Inc. employees that are expected to perform first aid are trained and certified by the American Heart Association or American Red Cross.

First-aid kits made available at each location shall be acceptable and sufficient for the type of work completed. Kits that are expected to be exposed to a harsher climate will be stored in weather-proof containers with individually wrapped items. First aid kits will be inspected monthly to ensure that they are stocked adequately and conditions are acceptable. Emergency eye-washing equipment shall be available at every worksite, and shall be acceptable for the type of work being completed.

Fire Protection & Prevention Procedures

Good housekeeping and fire prevention go hand-in-hand for obvious reasons, not only on jobsites but in the home and office, as well. Fires can start anywhere and at anytime.

Always obey smoking regulations. These are made for the protection of you and of others. Usually the "No Smoking" sign indicates that there are flammable materials or conditions in the area. You cannot see the vapors, but lighting a match could involve you in a fire.

Dispose of all flammable wastes quickly and efficiently. Put flammable scraps, wiping rags, or rubbish into metal containers. Gasoline, kerosene, oil, or other flammable liquids must be disposed of in special containers – never pour down drains or sewers.

Know where and how to turn in a fire alarm. Know where the fire extinguishers are kept and know what type fire they are meant for. Know the fire exit to use in an emergency. Help emergency fire brigades, but do not get in their way.

Change clothes immediately if they get soaked with oil, kerosene, naphtha, or other flammable liquid. Not only will changing prevent skin troubles, but also it will prevent a bad burn if the retained vapor catches on fire.

GENERAL FIRE SAFETY:

- Debris is to be put in proper receptacles – Leave area clean when finished.
- Use adequate size electrical cords and GCFI’s for power tools.
- Electrical machinery must be bonded or grounded.
- Flammable liquids must be stored in approved containers and handled in a safe manner.
- All state and local fire codes must be strictly adhered to.

Fire Extinguisher Classifications

Each class of fire requires the right type of extinguisher. Some types are designed to fight only one class of fire while others are effective on two or all three common classes of fire. Therefore, it is essential that you select the right size and type for each class of fire. The wrong one could do more harm than good. For example, if a water extinguisher were used on a live electrical fire it could cause severe shock or death. The following table lists the types of fires and the recommended extinguisher for each.

TYPE OF FIRE	RECOMMENDED FIRE EXTINGUISHER	FIRE FIGHTING TECHNIQUES
Class “A” – Ordinary combustibles such as rubbish, paper, rags, scrap lumber, etc.	Water, through the use of hose Pump type water cans Pressurized extinguishers Soda-acid extinguishers	Requires a cooling agent. Soak fire completely – even the smoking embers.
Class “B” – Flammable liquids, oils and grease.	ABC Dry Chemical extinguisher Carbon Dioxide extinguisher Foam extinguisher	Requires a smothering effect. Start at the base of the fire and use a swinging motion from left to right, always keeping the fire in front of you.
Class “C” – Electrical Equipment	ABC Dry Chemical extinguisher Carbon Dioxide extinguisher Halon extinguisher	Requires a non-conducting extinguishing agent. Use short bursts on the fire.

Our vehicles and sites require a minimum of a 2A:10B:C fire extinguisher. Vehicles that have fuel cells must have either (2) 2A:10B:C fire extinguishers or (1) 2A:20B:C fire extinguisher.

Fire Extinguisher Inspection and Maintenance

Study nameplate instructions and units carefully; familiarize you with the operating instructions. Most portable extinguishers operate by squeezing the lever. Each time the lever opens the valve, the stored pressure will force out some of the extinguishing agent. If lever is not released the entire contents will be discharged.

1. Check that extinguisher parts are intact (i.e. pull pin is seated, no cracks/holes in the nozzle or hose).
2. Make sure the nozzle orifice is clean and not clogged.

Annual Inspection:

Recharge extinguisher, as the contents will have a tendency to “clump together” over a long period of time. The office manager at each The Troyer Group Inc. location will ensure that the annual inspection occurs.

IMPORTANT: Recharge and service extinguisher immediately after every use, even if extinguisher has only been partially discharged. Notify the office manager.

Monthly Inspection:

Fire extinguishers shall be visually inspected monthly to ensure proper condition and charge. These inspections shall be documented on the log attached to each extinguisher.

DISPOSABLE EXTINGUISHERS MUST NOT BE RECHARGED.

Protect fire extinguishers from exposure to severe weather conditions. Extinguishers are approved for temperature range –40 degrees to +120 degrees F. Extinguishers are pressurized vessels, which if exposed to excessively high temperature could rupture, and result in injury or damage. **WATER TYPE EXTINGUISHERS MUST BE PROTECTED FROM FREEZING.**

Maintain fire extinguishers in accordance with the NFPA portable fire extinguisher standard, available from the National Fire Protection Association, 470 Battery March Park, Quincy, MA.

A qualified distributor should service fire extinguishers. Service by inexperienced persons can be dangerous.

IN CASE OF FIRE:

1. Warn everyone! Be sure everyone clears the area immediately and stays safely outside.
2. Have someone call the Fire Department no matter how small the fire seems to be. (Post the phone number by each telephone.)
3. Evacuate area involved.
4. Plan your evacuation and stay near an exit so you can escape in case the fire gets out of control.
5. Stay low to avoid inhaling smoke heated fumes and poisonous gases.

6. Use the proper extinguisher for class of fire involved.
7. Grasp the extinguisher firmly and pull out locking pin (operating procedures are marked on extinguisher).
8. Stand 6 to 10 feet from the fire (contents of extinguisher are under pressure).
9. Hold the extinguisher upright, point nozzle toward base of flames and squeeze the handle.
10. Discharge contents into base of flames, sweeping back and forth across underside of flames. For wall fires, start at the bottom and work your way up and for floor fires, sweep side to side and move forward as fire is extinguished.
11. After initial assault move progressively closer to fire, enabling the discharge stream or cloud to reach the furthest burning sections. Keep your back toward the wind. If extinguisher discharge scatters the fire, you are too close, move back until scattering action ceases.
12. After the fire is out, survey area for several minutes for “flashback” or small recurrences or flame. Check the rubble. Where there is smoke there can be fire. Be sure fire is out. Clean up area immediately after fire is confirmed out. Some dry chemical agents may corrode property if not cleaned up soon after extinguishment. Shut off power if you suspect fire was of electrical origin.
13. It shall be our policy to only attempt extinguishment on incipient grade fires. Our Primary function in a fire emergency is to facilitate evacuation and minimize damage.

Safety Procedures

- **Do not discharge extinguisher at a person’s face.**
- Avoid inhaling chemical contents. Although not poisonous, dry chemical powders may cause temporary irritation and vomiting, if this occurs contact a physician immediately.
- When using carbon dioxide extinguishers, avoid enclosed areas – suffocation may result. Should a person be overcome, they should be removed immediately from the space containing the gas. Call a physician and apply artificial respiration.
- Carbon Dioxide (snow) can inflict cold burns if it touches skin.
- **Never** enter an area where a fire was burning, even if it appears to be out. Fire may reflash, resulting in entrapment and burns.
- **Never** use water on electrical fires.
- **Never** throw an extinguisher into a fire, explosion may occur.

Training on the use of fire extinguishers and fire safety will be completed yearly. Trainings will be documented and records shall be kept until no longer relevant.

Safety Audit/Inspection Procedures

Purpose and Scope

The purpose and scope of this procedure is to establish requirements and responsibilities for performing objective safety, health and environmental inspections and audits in order to evaluate the effectiveness of and determine compliance with applicable Safety and Health Procedures and to proactively identify enhancement opportunities.

This procedure applies to all Troyer Group employees, jobsites, and vehicles.

Definitions

Safety Inspections – Personnel, jobsite and vehicle inspections that are documented and performed at required intervals.

Safety Audits – Audits that are documented to ensure safety inspections and safe work practices are being understood, followed and completed properly.

Inspector – A competent person assigned the task of performing and documenting required formal safety inspections at the required intervals.

Auditor – A competent person assigned the task of performing random safety audits or as circumstances require, to ensure Safety and Health procedures are being followed properly.

Responsibilities

The Safety Coordinator is responsible for the development, administration, implementation and management of the Troyer Group Safety Inspection and Safety Audit process.

The Safety Auditor is responsible for scheduled and random safety audits, to evaluate the effectiveness and determine compliance of safety policies, procedures and corrective actions.

Managers are responsible for the implementation of the Safety Inspection process, to ensure inspections are documented, recorded and performed at the required intervals. Also to take corrective action in a timely manner when deficient items/conditions are observed.

Troyer Group employees are responsible to perform the required safety inspections at the required intervals that apply to their job/vehicle assignment. Also to notify their Manager immediately of any deficient items/conditions, so corrective action can be taken.

Procedure

Safety Inspections:

- Employee, building and vehicle inspections shall be performed monthly as scheduled, using the correct documentation and filed for a period of one year.
- Inspections are to be reviewed by a Manager so that corrective actions can be taken.
- Deficient items and conditions are to be corrected in a timely manner.
- Corrective actions taken are to be noted on the inspection report and initiated by the Manager.

Safety Audits

- Safety Audits should be performed at random intervals to ensure Safety Inspections and Safety Procedures are being performed properly and corrective actions are being taken.
- Safety audits should be performed under the following conditions:
 1. When deemed necessary to verify a specific task, process or procedure implementation
 2. When deemed necessary to assess the capabilities of a sub-contractor's safety program.
 3. When significant changes are made to the scope of work, procedures or equipment.
 4. When it is suspected that the safety and health of employees is in jeopardy.
 5. When it is considered necessary to verify implementation of required corrective action.
- Safety Audits shall be reviewed by the Safety Administrator and the Safety Committee, to analyze and recognize trends and recommend Safety & Health Program enhancements.

Schedule

Inspections

- Non-DOT Vehicle Inspections are to be performed each month by the employee the vehicle is assigned to.
- DOT Pre-Trip Inspections are to be performed by the operator at the beginning of the shift, and a documented inspections shall be performed at the end of the shift.

Audits

- The Safety Committee will determine where and when audits are to be performed.

Ergonomics

Ergonomics is the study of the interaction of humans with their work environment. While it can extend to things like extremes of temperature and lightning levels, most workplace ergonomic issues relate to the strengths and structure of the human body and how it can be injured – sometimes permanently – from the organization of a person's workplace and his/her use of tools.

The term **Repetitive Trauma Injury** (RTI) really describes itself. These are injuries that occur a little at a time. Unless stopped or corrected, these injuries can become painfully debilitating. So, RTI is sometimes also called "Over Use Syndrome" because it arises from overuse of the body in ways that cause an accumulation of injury to the point of disability. Almost anyone can get RTI. Some examples include: construction workers, janitors, maintenance personnel, assembly line workers, health care workers, food servers, professional athletes, computer operators, and secretaries.

RTI results from injuries to joints, ligaments, muscles, and tendons of the body from repeated overuse of the body in certain work situations. The wrists, elbows, shoulders, neck and back are common sites of RTI. The injuries are usually related to incorrect job posture, uneven load carrying, working at extremes of reach or strength, and tools that are improper for the job. Typically, workstation design is the culprit.

Some guidelines to follow to reduce your chances of becoming a victim of ergonomic injury include:

- Avoid working repeatedly at extremes of reach or strength.
- Avoid placing constant loads on muscles; this tires them. For example, avoid constant overhead work as this loads the muscles of the neck and shoulder.
- Avoid working for long periods in awkward or uneven postures. For example, if you work at a computer terminal, don't place the screen to the side of the keyboard. Instead, keep everything in a straight line.
- Stop at least once an hour for a stretch break. Shake out your tight muscles and take a few deep breaths.
- If you work at a desk, get an adjustable desk chair – one that provides firm back and leg support.
- Avoid repeated hand motions or grasping with the wrist flexed. Try to work with the hand in a “neutral position”.
- Learn to lift items properly; most “bad backs” are the result of repeated injury over time. Finally, one more incorrect lift throws your back out, but the process started long ago.
- Many tools, from hammers to computer keyboards, have recently been redesigned with better “human mechanics” in mind. Suggest their use in your workplace, and consider purchase of these for your own use.
- If you are getting recurring limb or joint pain from your work, inform your supervisor so that the ergonomic problems can be corrected.
- Seek medical attention if your pain does not improve.

Safe Lifting:

Bad backs make up the majority of disabling chronic worker injuries. Be realistic about what you can lift. Don't try to lift or carry a load that's beyond your physical ability – get help! And weight just isn't the only criterion. Large, bulky items, because they are so awkward to carry, can cause other injuries like sprains or falls. Check out the path you'll be walking before you pick up the object. Prop open or get help; don't try to balance a load and open a door at the same time.

The most important rules to remember for safe lifting are these:

1. Footing is as important in lifting as it is in the batter's box. Feet close to the object; far enough apart for good balance (about shoulder-width). One foot slightly ahead of the other seems best for many.
2. Bend knees; go down to a crouch, but not a full squat. It takes double the effort to straighten up from a full squat as it does from a crouch.

3. Keep back as straight and upright as possible; don't arch it.
4. Get a good, firm grip; no lifting until your hold is strong and slip-proof. Wear gloves when handling rough equipment or material.
5. Lift object gradually by straightening your legs, keeping load close to you as you come up. (Tip: Don't frustrate your body by trying to keep your clothes clean. A dirty shirt is better than a sprained back.)
6. When lifting with a helper, plan your actions ahead of time so you can work together. Discuss who is going first and what route you will take. Consider enlisting the help of another to guide and direct you both. Don't suddenly drop your end without alerting your partner.
7. If you have to change direction, don't twist your body. Lift object to carrying position, and then turn your whole body by changing the position of your feet.
8. Lifting a load from a low position to over shoulder-high is difficult because a change in hand position is generally called for. Find a surface to rest the load on at chest height to permit the change. Use bent knees to lift the load the second time. Lifting objects to shoulder-and head-height becomes hazardous because the load is less stable. Also, most individuals have much less useable strength in that position (the lifting is now being done with the arms instead of the legs), and the load can be more hazardous if permitted to fall from the greater height.
9. Besides straining your back, placing the load back down can be hazardous for fingers. If possible, put boards or spacers under the load to leave room for you to remove your fingers. Reverse the body motion of the lifting action. If you're placing the load on a bench, first rest it on the edge, and then slide it onto the surface.
10. In setting the load down, go down with back straight, knees bent, to a crouch.

BEWARE WHEN YOU'VE BEEN AWAY – Even if you're a rugged, seasoned lifter, remember that muscles quickly get out of shape during vacation, or a spell of illness. Be doubly careful those first few days back on the job; ease into it gradually. **AND REMEMBER** – Whenever conveyors, hand and lift trucks, other mechanical-handling equipment can do the job, let it take the strain and spare your spine!

Lockout/Tagout Program

Lockout/Tagout helps safeguard employees from hazardous energy while they are performing servicing, installation or maintenance on machines and equipment. The standard identifies the practices and procedures necessary to shut down and lock or tag out machines and equipment. It requires that employees receive training in their role in the lockout/tagout program, and mandates that periodic inspections be conducted to maintain or enhance the energy control program. As such, this program will be reviewed and assessed annually to ensure adequate protection for all employees and sufficient understanding of the importance and gravity of the subject matter.

All employees are provided training on the The Troyer Group Inc. Lockout/Tagout program as a part of their preliminary training and once every year as part of the Toolbox Talk program. These trainings are thoroughly documented and records are kept until they are no longer relevant.

Employee re-training shall be conducted when any employee demonstrates deficiencies in understanding or complying with the Lockout/Tagout policy.

The Troyer Group Inc. recognizes that Lockout/Tagout is the preferred method of isolating machines or equipment from energy sources.

Group Lockout or Tagout:

When servicing and/or maintenance is performed by a crew, craft, department or other group, each authorized employee must utilize the following procedure which affords the employees a level of protection equivalent to that provided by the implementation of a personal lockout or tagout device.

All locks and tags shall identify the individual or group of employees that attached them, and only these employees shall be allowed to remove the locks and tags. Employees shall be responsible for removing their lock, and only their lock. If a lock needs to be removed and the employee responsible for attaching the lock is no longer at the worksite or facility, positive contact shall be made with the employee to ensure that they understand the need and approve the removal of the lock or tag.

Group lockout or tagout devices will be used in accordance with the procedures listed in this program and include:

- Primary responsibility is vested in a single authorized employee for a set number of employees working under the protection of a group lockout or tagout device. The authorized employee with primary responsibility will be determine before lockout tagout is performed;
- The authorized employee with primary responsibility will ascertain the exposure status of individual group members with regard to the lockout or tagout of the machine or equipment;
- When more than one crew, craft, department, etc. is involved, assignment of overall job-associated lockout or tagout control responsibility to an authorized employee designated to coordinate affected work forces and ensure continuity of protection will be implemented. The authorized employee with primary responsibility will coordinate these efforts.
- Each authorized employee must affix a personal lockout or tagout device to the group lockout device, group lockbox or comparable mechanism when he or she begins work, and shall remove those devices when he or she stops working on the machine or equipment being serviced or maintained. Each authorized employee will notify the authorized employee with primary responsibility when their work is completed and prior to the removal of lockout or tagout devices.

Revision History Record:

Revision Number	Section	Revised By	Description
0	NA	NA	Original document.

Glossary of Terms

ANSI: means American National Standards Institute

Approved: means sanctioned, endorsed, accredited, certified, or accepted as satisfactory by a duly constituted and nationally recognized authority or agency.

Authorized Person: means a person approved or assigned by the employer to perform a specific type of duty or duties or to be at a specific location or locations at the jobsite.

Company: The Troyer Group Inc.

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.

Qualified: “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.

Safety Factor: means the ratio of the ultimate breaking strength of a member or piece of material or equipment to the actual working stress or safe load when in use.

Appendix A- Vehicle Accident Checklist

Vehicle Accident Checklist

A. Employee is to Notify their Supervisor Immediately while at incident site

B. Supervisor Duties

- ***Record** date of injury and **time** accident occurred.
- *Take pictures of both sides of other persons drivers license.
- *Take pictures of both sides of other persons insurance card.
- *Take a picture of **other** persons license **plate**.
- *Take pictures of damaged areas of both vehicles.
- *Take pictures of general area, any property damage, skid marks,
- *Take a picture of tow truck if one was used showing the name **and contact information**.
- *Take a picture of police car so that we know what police department was onsite. *Get accident report number from police officer.
- *Contact P.D.E. Safety Department for directions on where to go for mandatory drug test.

Safety Department:

574-272-9814

ext.: 1017

Doug Grail

Cell: 574-276-5457

ext.: 1009

Kirsten Byler

Cell: 574-520-0477

C. Supervisor and Employee are to fill out a vehicle accident report the next morning, and forward to our Safety Department so that it can be reported to our Insurance Company within the 24 hours required.