

Corporate Safety and Health Manual

June 16, 2005 July 22, 2005 March 17, 2006 September 17, 2007 November 2016 September 7, 2017 March 16, 2020 May 7, 2020 July 22, 2021

Amended to include Fall Protection, Section 20
Amended GRB Environmental Comments
Amended to include D.E.P. Nosie Mitigation, Section 33
Sixth Edition
Amended to include Respirable Crystalline Silica Dust Control Plan
Amended to include Coronavirus Job Site Protocol
Amended to Update Coronavirus Job Site Protocol & Online References
Amended to include First Aid Policy & Loss Prevention Statement

Amended Ladder and Scaffold, Section 19



Emergency Phone Numbers

Fire/Ambulance/Police: 911

CHEMTREC 1-800-255-3924
Poison Control 1-800-562-8236

First Aid/Urgent Care: CityMD

For All Other Emergencies:

Safety Director: Michael Cuttita (631) 745-8060 Safety Administrator: Debra Dale (631) 234-4500 x286

Competent Person:

General Contractor:

Insurance Company: Alliant (516) 414-8656
Workman's Comp: Travelers (516) 414-8656

Electric Co.: Con Edison

Public Works (water):

Dig Safe:

OSHA Consultation: OSHA, USDOL Manhattan Office

201 Varick Street #670, Manhattan Kevin Brennan (212) 337-2339



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Island Acoustics, LLC Section 1: Safety Policy Statement

In completing our construction projects, Island Acoustics, LLC will perform all work in a manner that results in quality craftsmanship and, at the same time, controls the possibility of injury to our employees, subcontractors, and the general public.

We will adhere to applicable safety regulations and will take the necessary precautions to control damage to adjoining property, our equipment, and to property on the construction site(s). All officers, management personnel, employees and subcontractors will actively participate in meeting this commitment.

Each construction site is unique. As a result some procedures may need to be refined or expanded to meet the site-specific safety and loss control needs of a particular project. The project supervisor may refine or expand these safety procedures as needed, with my approval.

Safety is as critical to our operations as production and quality. Island Acoustics, LLC is committed to maintaining safe and healthy work places, and to protecting the public against potential hazards caused by our operations. No job is so important or urgent that each and every one of us cannot take the time to perform it safely.

All accidents are preventable. It is up to each of us to ensure that safety is a routine part of our daily work.



President, Island Acoustics, LLC

November 30, 2016



Island Acoustics, LLC Section 2: Safety and Health Manual Introduction

Island Acoustics, LLC believes that safety compliance is as critical to our operations as production and quality. To this end, we are committed to maintaining safe and healthy work environments for our employees and to protect the general public against the potential hazards caused by our operations.

This safety manual is the foundation and core upon which we will build our safety and health program. This manual is not, nor can it be, designed to be all encompassing in content. It is the company document from which we will help one another become more acutely aware of the dangers of our industry and find ways to work safer within such environment.

It should be understood that there are Federal Laws, (OSHA) for construction operations (29 CFR 1926) and general industry (29 CFR 1910) as well as state, municipal and local codes including Chapter 33 of the New York City Building Code that may also apply to our operations. At a minimum, our intent is to be in compliance with such laws. This program is intended to help us maintain a safe and healthy work environment and, in doing so, help us comply with the applicable laws and codes. Should a conflict arise between multiple regulatory agencies, Island Acoustics, LLC will comply with the most stringent law.

This Manual is living documents that contains our policy statements and overall goals and objectives. Also included are the responsibilities of our personnel as well as those of our subcontractors to make this program as successful as possible.

Sections and respective attachments are provided to assist our management personnel in carrying out the responsibilities as set forth within the Manual.



Company Safety Goals and Objectives:

The project foreman on each of our sites will be accountable to the Island Acoustics, LLC President and senior management personnel for the successful achievement of targeting our safety and loss control goals. Our goals for every project are as follows:

- Have no incidents that result in injury to our employees, subcontractors or the general public.
- Have no incidents that result in property damage to the site, equipment, vehicles or adjacent property.

Responsibilities:

President/Senior Management Team:

Management is ultimately responsible for the safety of our operations. As such, the President and/or Senior Management will:

- Provide direction, motivation and accountability to ensure an effective safety program for each of our projects.
- Establish annual safety goals and objectives including but not limited to safety and health training for our employees. Examples of training include OSHA 10 and 30 Hour Outreach Training, Confined Space Training and Respiratory Training.
- Establish an adequate project budget to fund the safety and health program. This includes considering the impact on safety for all of our contract bids. When a project is out of the ordinary, ensure that specific safety guidelines are implemented to address the unique safety issues discovered.



Responsibilities:

Safety Director:

- Assure that each member of the field supervisory team has a good working knowledge of governmental, (OSHA) and Island Acoustics, LLC safety requirements.
- Assist project supervisors and/or foremen in the formulation of site-specific safety and health plans such as HASPs.
- Assure that the OSHA 300/ 300A log and summary forms are maintained at our corporate office as well as our respective job sites.
- Verify the licensure of all employees authorized to drive an Island Acoustics, LLC vehicle or operate a personally owned vehicle on company business, (MVR check).
- Periodically participate in employee safety training including tool-box talks.
- Make available and strictly enforce the use of personal protective equipment.
- Assure that our subcontractors understand their own safety and health responsibilities when working for Island Acoustics, LLC. This includes but is not limited to adhering to Island Acoustics, LLC safety and health rules as described within this manual.
- Establish necessary action to ensure a successful safety and health program.
- Provide foremen with a safety information package at the start of each job INCLUDING A SITE SPECIFIC PROGRAM, SIGNAGE, ACCIDENT REPORT FORMS AND OSHA POSTINGS.
- Provide tool-box talk forms as necessary.
- As a part of performance evaluations, hold foremen accountable for the success or failure in achieving specific safety and health goals. This includes but is not limited to completion of self-inspections, tool-box talks, and incident and accident reports.
- Provide general guidance and advice for all project supervisors in regards to safety and health compliance matters.
- Actively partake in an employee return to work program.
- Assist in "serious type accident" investigations.
- Collect and file all accident reports.
- With the assistance of office staff, complete the OSHA 300 and 300A logs on an annual basis.
- When notified, accompany OSHA and insurance company representatives on job site audits.
- Maintain a list of all formal training records for every employee.



Responsibilities:

Job Superintendents/Foremen:

The job foreman is responsible for safety and health compliance on his/her job site. As such each of our foremen is deemed to be a "Competent Person" as defined by OSHA and will:

- Set a positive example for all of our workers to follow.
- With the assistance of management, establish safety and health programs per client specifications, OSHA and/or our company program procedures.
- Monitor safety and health compliance on the jobsite by personally conducting daily inspections of the site and taking immediate corrective action if warranted.
- Investigate accidents and incidents to determine the root causes. Initiate corrective action to prevent reoccurrence of similar accidents. Foremen should refer to the Accident and Recordkeeping section of this Manual and follow the instructions carefully.
- Notify the corporate office and the safety director of Island Acoustics, LLC of any serious accident
 associated with their work/employees. This includes fatalities and/or recordable accidents as defined by
 OSHA. Further, the foreman will notify the OSHA area office within 8 hours of a fatality or 24 hours of inpatient hospitalization, amputation or loss of an eye.
- Prepare and maintain all accident and incident reports. Copies of reports should be sent to the safety director and a copy will remain in custody of the foreman for OSHA compliance purposes.
- Maintain and update any/all necessary OSHA records including safety data sheets.
- Conduct safety training for all field personnel. This includes new-hire orientations for new workers as well as subcontractor personnel.
- Conduct, at a minimum, weekly safety meetings with the employees of Island Acoustics, LLC on the job site.
- Ensure that the job site has the necessary safety equipment required by governmental codes, this safety program and contractual requirements.



Responsibilities:

Job Superintendents/Foremen:

- Ensure that the job site has a supply of necessary personal protective equipment as well as first aid supplies.
- Ensure that the job site has emergency phone numbers and a fire/emergency evacuation plan.
- Enforce the use of appropriate personal protective equipment with our employees and our subcontractor employees.
- Monitor our subcontractors to assure safety and health compliance is being met and/or notify their management of any infractions found.
- Enforce any disciplinary action necessary to ensure a well-functioning safety program. This includes, but is
 not limited to stopping unsafe operations, notifying our clients of unsafe conditions caused by others and
 issuing our own employees discipline warning notices.
- Ensure that all necessary permits, licenses and certifications are obtained and maintained on file for each project. This will be performed regardless of owner/ general contractor requirements.
- Take immediate action to correct any unsafe act or condition identified. This includes shutting down an operation when imminent danger exists or potentially exists.
- Notify the safety director for Island Acoustics, LLC of any safety and health regulatory agency visit. This includes, but is not limited to OSHA inspections.



Emergency Preparedness Procedures for Foremen:

Each job foreman will have a working knowledge of fire prevention and protection.

- Emergency phone number signs and directions to the nearest hospitals will be available on each of our projects.
- New-hire orientation training will include the following subjects:
- The location of the emergency phone number signs
- The location of fire alarm systems, telephones and firefighting equipment on the job site.
- The fire/emergency evacuation route and the appropriate muster point(s).

Each job foreman will be responsible for vehicles and equipment assigned to their project site. Each foreman will assure that:

All company vehicles and equipment are maintained in accordance with the manufacturer's recommendations.

Equipment is inspected for proper operation, including built-in safety features prior to use.

Responsibilities:

Employees:

Safety is a management responsibility; however, management cannot solely be responsible for the acts of employees. Each of our employees is expected, as a condition of employment, to work in a manner which will not inflict self-injury or cause injury to anyone else. It is of paramount importance that each employee understands that responsibility for his/her own safety is an integral job requirement. To this end, each of our employees is expected to:

- Comply with all the safety and health rules of Island Acoustics, LLC
- Report any and all accidents or injuries to their supervisor immediately.
- Use the proper tools and personal protective equipment for their job function.
- Report any and all unsafe conditions to their supervisor.
- Be familiar with emergency phone number signs and the job-specific fire/emergency evacuation plan.
- Assist in maintaining a safe and clean work environment.



Responsibilities:

Employees:

- Inspect all equipment, (hand tools/ ladders/ powder actuated tools/ vehicles/ etc...) prior to use.
- Inspect their personal protective equipment and notify their supervisor of any defects found.
- Set a good example for others to follow especially new hires.
- Attend and participate in all safety meetings and training sessions offered. This includes, but is not limited to, weekly safety meetings.
- Obtain and maintain safety and health training certification including but not limited to training requirements for work within the five boroughs of the City of New York such as OSHA 10 Hour Construction Outreach, NYC DOB 4 Hour Scaffold User, and NYFD Certificates of Fitness.
- Before starting work on a site, all Island Acoustics, LLC employees shall attend an information session or Site Specific Orientation. Various topics, such as the locations of emergency telephones and first-aid services, safety regulations and will be given a booklet outlining important health and safety information and they will sign a form attesting to their attendance. The Safety Manager performing Orientation will verify that all Island Acoustics, LLC employees have:
- o Proper training and Certificates of Fitness for their trade and jobs they will be performing.
- OSHA 30/40/62 Hour Card current within (5) Five Years
- o GHS Training Cards
- Scaffold Training Cards



Responsibilities:

Subcontractors:

Island Acoustics, LLC expects that all of it's subcontractors and vendors will have established their own corporate safety and health program. In the event that this is not the case, then the subcontractor will officially sign-off that they agree to abide by the Island Acoustics, LLC Safety Program Manual.

At a minimum, we will ensure that the subcontractors performing work on our projects adhere to and comply with all Federal, State, City and local regulations at a minimum as well as comply with the requirements and policy of the Island Acoustics, LLC Corporate Safety Manual.

Each subcontractor is expected to:

- Comply with, adhere to and enforce all Federal, State City and Local Safety and Health regulations as well as the Island Acoustics, LLC Corporate Safety Program.
- Prior to commencing work on a site, representatives of the subcontractors must meet with Island Acoustics,
 LLC project superintendent to review their operation and procedure as well as review and discuss their Job
 Specific Safety Program as well as Island Acoustics, LLC Constructions' safety expectations.
- Submit a copy of their Job Specific Safety Program that outlines the scope of their work associated with the
 project, any special equipment that will be utilized (i.e. cranes, scaffolds, aerial lifts....), exposures to their
 employees and or the general public associated with or expected to be encountered during the course of
 their operation; and identification of controls that they will implement and enforce to eliminate these
 exposures.
- On certain operations OSHA requires specific safety related written programs such as lead, confined space, fall protection and silica. Prior to the start of any operation requiring a written program, the subcontractor must submit a copy of that program to the Island Acoustics, LLC superintendent for review.



Responsibilities:

Subcontractors:

- Designate and name an individual who will be responsible for overseeing and coordinating the safety activities associated with their operation. It is not expected that this will be a full time safety position but rather an individual who meets the OSHA definition of a "Competent Person". Such individual is expected to understand, implement and enforce safety for their company during the course of the respective work.
- Supply Island Acoustics, LLC with copies of their Hazard Communication Program and Safety Data Sheets.
- Adequately train their own field personnel on proper safety and health practices.
- Conduct and submit copies of weekly safety meetings held with their employees.
- Attend and participate in formal weekly safety meetings.
- Notify Island Acoustics, LLC management immediately in the event of an OSHA inspection when no Island Acoustics, LLC personnel are on site.
- Supply and ensure the proper use of all tools and equipment for their employees. This includes personal protective equipment and safety devices.
- Notify Island Acoustics, LLC superintendent immediately when an accident has occurred and supply a copy
 of a fully completed and acceptable accident investigation form. This will be required for all accidents, no
 matter how minor in nature. All reports will be provided in a timely fashion.

The personal safety and health of the general public and each employee of Island Acoustics, LLC is of primary importance. The prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity whenever necessary. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal health and safety of the general public and each employee.

OUR ULTIMATE GOAL IS ZERO ACCIDENTS. The objective of our Health and Safety Program (HASP) is to reduce the number of disabling injuries and illnesses to a minimum, not merely in keeping with, but surpassing the best experience of other operations similar to ours.

Corporate management, supervisors and employees must embody the proper attitudes toward injury and illness prevention, for this program to be successful. It also requires cooperation in all health and safety matters, not only between corporate management, supervisors and employees, but also between each employee and his/her fellow workers. Only through such a cooperative effort can a safety record, in the best interest of all, be established and maintained.



Island Acoustics, LLC Section 4: New Employee Orientation Packet

I HAVE RECEIVED THE ISLAND ACOUSTICS, LLC "NEW EMPLOYEE ORIENTATION," THEREFORE; I HAVE BEEN INSTRUCTED AND AM AWARE OF THE FOLLOWING:

COMPANY SAFETY PROGRAM

I understand that the safety and welfare of employees and the general public is of major concern to Island Acoustics, LLC, (ISLAND ACOUSTICS, LLC) and that full cooperation from all employees is needed in order for this program to succeed. I also understand ISLAND ACOUSTICS, LLC incorporates Fall Protection into their Corporate Safety Program.

PERSONAL PROTECTION EQUIPMENT

I understand that personal protective equipment will be supplied for my use and that I am required to utilize this equipment for my personal safety. I also understand that failure to utilize this personal protective equipment is a breach of Island Acoustics, LLC's Safety Program for which I may receive a disciplinary action.

SAFETY VIOLATIONS

I understand that a failure to comply with Island Acoustics, LLC's Safety Program and Policies will result in my immediate dismissal.

HAZARD COMMUNICATION PROGRAM

I understand that as an employee of Island Acoustics, LLC, I have the Right-To-Know what hazardous chemicals and substances I may be exposed to on the jobsite.

EMPLOYEE EQUAL OPPORTUNITY AND SEXUAL HARASSMENT POLICY

I understand that I was hired without regard to age, race, color, religion, sex, marital status, disability or national origin and that sexual harassment is forbidden on the jobsite.

By signing this employee verification sheet, I acknowledge my understanding of Island Acoustics, LLC's Safety Program and my responsibilities associated with this program.

Employee Name (Print)
Employee Name (Signature)
Person providing the Training (Print)
Person providing the Training (Signature)
Date Project Name



Island Acoustics, LLC Section 5: Prohibiting Discrimination & Harassment Policy

POLICY STATEMENT

Island Acoustics, LLC is committed to providing its employees with a work environment that is free of discrimination, including harassment, on the basis of any legally protected status. Accordingly, Island Acoustics, LLC expressly prohibits any form of unlawful discrimination and harassment against any Island Acoustics, LLC employee by anyone, including managers, co-workers, vendors and customers.

This policy applies to all Island Acoustics, LLC employees. Every Island Acoustics, LLC employee must avoid any conduct that could be reasonably interpreted as conduct prohibited by this policy. In addition, every employee should endeavor to protect other employees from unlawful discrimination and harassment and maintain a work environment free from unlawful harassment or intimidation.

PROHIBITED CONDUCT

Conduct prohibited by this policy includes any verbal or physical conduct that could reasonably be perceived as denigrating or showing hostility toward an individual because of the individual's race, color, religion, gender, national origin, age, disability, or other status protected by law, or because of the protected status of the individual's relatives, friends, or associates. Harassing conduct prohibited by this policy includes, but is not limited to:

The General Rules of Construction Safety and Health for Island Acoustics, LLC

- a) Epithets, slurs, negative stereotyping, or intimidating acts that are based on an individual's protected status, and,
- b) Written or graphic material circulated or posted within the workplace that shows hostility toward an individual because of his or her protected status.

SEXUAL HARASSMENT

Sexual harassment, according to the Equal Employment Opportunity Commission, and for purposes of this policy, consists of unwelcome sexual advances, requests for sexual favors or other verbal or physical acts of a sexual or sex-based nature, where:

- a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- b) An employment decision affecting an employee is based on that individual's acceptance or rejection of such conduct; or
- c) If such conduct interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.



Island Acoustics, LLC Section 5: Prohibiting Discrimination & Harassment Policy

Sexual harassment is not limited to explicit demands for sexual favors. It refers to behavior that is not welcome, that is personally offensive, that fails to respect the rights of others, that lowers morale or interferes with work effectiveness. Sexual harassment may take various forms, including the following:

- a) VERBAL Sexual innuendoes, suggestive comments, teasing and jokes of a sexual nature, sexual advances or propositions, repeated offensive sexual flirtations, sexually degrading words about an individual, graphic verbal commentary about an individual's body, sexually-oriented language and threats.
- b) NON-VERBAL Displaying or circulating in the workplace obscene or sexually suggestive objects, pictures, or graphic commentaries, leering, whistling and obscene gestures.
- c) PHYSICAL Unwelcome physical contact, including touching, pinching, brushing the body and other types of coerced or offensive sexual activity or physical contact.

PROCEDURES

Island Acoustics, LLC encourages individuals who believe they are being harassed to firmly and promptly notify the offender that his or her behavior is unwelcome. Additionally, any Island Acoustics, LLC employee who has witnessed or experienced any conduct which he or she believes to be inconsistent with this policy, has a responsibility and an obligation to report that conduct promptly to his/her immediate supervisor.

All reports of conduct inconsistent with this policy will be promptly and thoroughly investigated. The investigation will include such fact-finding procedures as are deemed necessary including interviews of the complainant, the person accused, and any other person who may have information regarding the alleged discrimination or harassment.

DISCIPLINE/SANCTIONS

a) Any employee found to have engaged in conduct that violates this policy will be subject to discipline. The disciplinary action taken with respect to each violation will be determined in accordance with the seriousness of the particular offense and may include written warnings, suspension, demotion or discharge.

Island Acoustics, LLC has the right to impose any sanction or combination of sanctions to deal with the conduct up to and including termination of employment. Island Acoustics, LLC will advise the complaining part that corrective action has been taken.

Where a hostile work environment has been found to exist, Island Acoustics, LLC will take reasonable steps to eliminate the conduct creating such an environment.

Employees may also be subject to discipline for inappropriate conduct established during the investigation of a report made under this policy, even if the conduct does not constitute unlawful



harassment or violation of this policy.

Island Acoustics, LLC Section 5: Prohibiting Discrimination & Harassment Policy

b) Should either the complainant or alleged offender be dissatisfied with the findings or actions resulting from an allegation or harassment, that individual may further discuss the issues with the company.

PROTECTION AGAINST RETALIATION

Any employee who reports harassment, registers a complaint pursuant to this policy or participates in an investigation of harassment shall be protected from any form of retaliation. Retaliation is a serious violation of this policy and should be reported immediately.

CONFIDENTIALITY

Island Acoustics, LLC will endeavor to keep all matters related to investigations conducted under this policy confidential, including statements given by employees. However, no employee can be guaranteed that his or her statement will never be disclosed, as information sometimes must be shared in order to further an investigation. Moreover, in the event of a lawsuit or an administrative proceeding, records and information maintained by Island Acoustics, LLC and the complainant may not be considered privileged from disclosure.



Island Acoustics, LLC Section 6: The General Rules of Construction Safety and Health

- 1. All work related injuries or illnesses must be immediately reported to your foreman or supervisor the day of the injury. All injuries will be thoroughly investigated.
- 2. New Employee Orientations and Weekly Safety Meetings shall be conducted specific to the hazard exposure for each phase of work. All employees will receive training in our Hazard Communication Program.
- 3. Never start any hazardous job task without being completely familiar with the safety techniques that apply to it. Check with your foreman or supervisor if in doubt.
- 4. Proper work clothing will be worn at all times on all our projects. This will include head protection, eye protection, work boots/shoes and full-length pants included. Any type of sneakers, sandals or casual shoes and tank tops are prohibited.
- 5. Personal Protective Equipment (PPE) is provided by Island Acoustics, LLC Required equipment such as eye, face and hearing protection, traffic vests, personal fall protection devises and respirators must be worn at all times when exposure to the related hazards exist while performing your job task. ANSI APPROVED HEAD PROTECTION MUST BE WORN AT ALL TIMES ON ALL OUR PROJECTS.
- 6. ONLY if other means of fall prevention are not practical, Personal Fall Arrest Systems shall be used for fall protection when working at heights greater than six feet. THIS INCLUDES ALL WORK ACTIVITIES ON ALL ISLAND ACOUSTICS, LLC JOBS.
- 7. Only trained, authorized or licensed personnel will operate or service equipment. Equipment will be operated in accordance with the manufacturer's recommendations.
- 8. Tools, equipment, machinery and work areas must be maintained in a clean and safe manner. Unsafe conditions/defective equipment shall be reported to your foreman/supervisor (immediately).
- 9. Obtain full instructions from your foreman or supervisor before operating an unfamiliar machine.
- 10. Make sure all safety attachments are in place and properly adjusted before operating any machine.
- 11. Do not operate any equipment or machine at unsafe speeds.
- 12. Never repair or adjust any equipment or machine unless you are specifically authorized to do so by your supervisor/foreman.
- 13. Equipment operators must safeguard other workers at all times.
- 14. Equipment operators will not engage in any activity that may interfere with the operation of the machinery or equipment that they are in charge of. This activity includes the use of cellular phones and radios.



15. All electrical tools/equipment will be protected using Ground Fault Circuit Interrupters (GFCI's).

Island Acoustics, LLC

Section 6: The General Rules of Construction Safety and Health

- 16. Housekeeping is essential. Put tools and equipment away when not in use. Work areas, machinery and all ISLAND ACOUSTICS, LLC facilities shall be maintained clean and orderly at all times.
- 17. Do not lift items that are too heavy or too bulky. Ask for assistance.
- 18. All posted warning signs, signals and safety rules shall be obeyed.
- 19. Horse play, rowdiness, profane language, reckless driving of vehicles and equipment or a belligerent attitude on the part of any employee toward other company personnel or the general public is forbidden and will not be tolerated.
- 20. All ISLAND ACOUSTICS, LLC sites are considered alcohol and drug free work sites. No drugs or alcohol will be allowed on site.
- 21. The use, possession or sale of regulated drugs is prohibited without a doctor's written prescription and management's prior knowledge. Violators will be removed from the project.
- 22. Blatant disregard of ISLAND ACOUSTICS, LLC's safety rules is a possible danger to yourself as well as those around you. Any employee found not in compliance with ISLAND ACOUSTICS, LLC safety rules will be terminated immediately.
- 23. Supervisors and foreman are authorized to enforce these safety rules and instruct new employees to perform their job in a safe and efficient manner.
- 24. All necessary permits will be obtained by each subcontractor on our projects.
- 25. All necessary licenses, training certificates, certificates of fitness, etc., will be obtained and copies of such certification will be provided to Island Acoustics, LLC for on-site filing.
- 26. All subcontractor construction personnel working on or visiting Island Acoustics, LLC sites will have, at least, certification of the completion of a US Department of Labor OSHA 30/40/62 Hour Outreach Training Course for Construction. Copies of such certification will be made available to Island Acoustics, LLC for on-site filing.

General Safety Rules

The intent of this section is to provide all Island Acoustics, LLC employees with general rules of safe conduct while on company property and/or while working on company projects.

It has been estimated that 85% of all construction accidents and injuries are a result of unsafe acts. Before taking on a task, think about what has to be done and how you may get yourself into a dangerous situation. Adjust or alter your routine so that the task can be completed in a safe manner. Use good judgment and never place yourself or a co-worker in danger. Following are ten general rules to keep in mind:



Island Acoustics, LLC Section 6: The General Rules of Construction Safety and Health

Drugs and Alcohol: Drugs and alcohol are strictly prohibited on our projects. Under no circumstance will a person be permitted on a project while under the influence of drugs or alcohol. This restriction includes any medications, (over the counter or prescribed by a doctor) which may alter or otherwise inhibit your ability to perform your job safely.

Smoking: Smoking is prohibited on every job site and within the five boroughs of New York City and will not be tolerated.

Proper Attire: Proper attire will be worn while on the job. Work boots/shoes, full-length pants and work shirts are to be worn. Sneakers, sandals, open toed or soft footwear is prohibited.

Personal Protective Equipment: Island Acoustics, LLC provides PPE. This equipment, (hardhats, eye, face protection, personal fall arrest equipment, hearing protection, etc...) must be worn as specified within the PPE Section of this Manual. At a minimum, head and eye protection must be worn at all times when working on our project sites. High visibility clothing (vest, shirt) shall be worn on all projects. This rule shall apply to all subcontractor personnel as well as our own. Any worker, including flag personnel, working at or adjacent to vehicular traffic will wear reflective vests in accordance with current ANSI and MUTC code.

Horseplay: Horseplay, running and/or fighting on the job is strictly prohibited.

Housekeeping: It is the responsibility of others, (CM/GC Laborers) to keep work areas as clean as possible. Aisles, walkways and work areas must remain clean and clear of debris at all times. Un-clean or hazardous areas should be brought to the attention of our field foremen.

Material Storage: In accordance with NYC Building Code all our material and equipment will be stored at least 10 feet away from unenclosed building perimeters.

Material Handling: Remember to lift with your legs while keeping your back straight. Turn by moving your feet as opposed to twisting your waist. Make use of material handling equipment and/or get help when lifting heavy loads. It is better form a safety standpoint to push rather than pull.

Safety and Health Training: As a condition of employment, we expect every one of our field employees to ensure their safety and health training credentials are current and valid. This includes but is not limited to OSHA 10 Hour Construction Outreach Training, NYC Fire Prevention Unit Certificates of Fitness and NYC DOB 4 Hour Scaffold User Training.

Tools and Equipment: Inspect all tools and equipment including ladders, lifts and scaffolds prior to use every day. Damaged or defective tools and equipment will not be used but taken out of service and replaced. Under no circumstance will we permit other trades personnel to use our tools or equipment. This includes but is not limited to ladders, scaffolds and lifts.

Hazardous Materials: Know the chemicals that you are working with. Follow labels and Safety Data Sheet warnings and instructions. If you are unsure how to handle a particular product, ask your immediate supervisor.



Island Acoustics, LLC Section 6: The General Rules of Construction Safety and Health

Confined Spaces: Never enter into a confined space by yourself. Entry into a confined space will only be performed under the Confined Space Entry Program which meets Federal and State requirements.

Extension Cord Sets: Cords must be the 3-prong type. Worn, frayed or damaged cords must not be used. They will be removed from service and replaced.



Island Acoustics, LLC Section 7: Disciplinary Policy

Disciplinary Policy

Island Acoustics follows a strict action policy when addressing violations to the safety and health rules that exist within the workplace environment. As a condition for employment, all employees are encouraged to participate actively in company safety programs and follow safety regulations. Management and the Safety Administrator both adhere to the principal that the employee carries the responsibility to follow the rules that are presented to him or her. Willful disregard of safety practices, company rules, instructions or the welfare of fellow employees has no place at Island Acoustics. This kind of behavior may lead to injuries and damage of the facility. When violations occur, disciplinary measures will follow to preserve the integrity of the program.

Disciplinary action up to and including termination of employment will be taken in those cases where it is determined that blatant disregard for the safety practices has occurred. In the event that progressive discipline is inappropriate, the following company format will be followed:

Upon the safety infraction, the employee will receive a written warning. This form will detail the infraction and will also have an area where the employee can respond to the warning and sign it. Upon the third such warning, the employee will be terminated. Management reserves the right to terminate any employee on the first offense if that employee is in willful violation of operating rules or safety procedures which directly results in damage to property or endangers or causes injury to guests or employees. Foreman/Supervisors are to document all warnings/incidents.

Acoustics disciplinary policy:

First offense Verbal warning

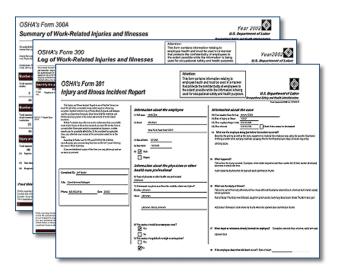
Second offense Suspension - Employee sent home for the day without pay

Third offense Termination



Island Acoustics, LLC

Section 8: Accident, OSHA Record Keeping Policy & First Aid Policy



BASIS: Records provide employers and OSHA with statistical data to enable safety programs to determine where emphasis should be placed in order to mitigate or eliminate injuries or accidents in the future. The OSHA Recordkeeping Standard establishes uniform requirements to make sure that the illnesses and injuries sustained in U.S. workplaces are evaluated, and that this information is properly collected, compiled, retained, analyzed, and transmitted to all affected workers and to OSHA.

GENERAL: This standard practice instruction (SPI) provides for recordkeeping and reporting requirements covered under 29 CFR 1904 as well as 29 CFR 1910 as necessary or appropriate for developing information regarding the causes and prevention of occupational accidents and illnesses, and for maintaining a program of collection, compilation, and analysis of occupational safety and health statistics both for Island Acoustics, LLC and as part of the national system for analysis of occupational safety and health.

Island Acoustics, LLC has developed and will maintain this written OSHA Recordkeeping program. Island Acoustics, LLC continue to review and evaluate this standard practice instruction on an annual basis, or when changes occur to OSHA Standards that prompt revision of this document, or when facility operational changes occur that require a revision of this document. Effective implementation of this program requires support from all levels of management within Island Acoustics, LLC This written program shall be communicated where required to all personnel that are affected by it. It encompasses the total workplace, regardless of the number of workers employed or the number of work shifts. It is designed to establish clear goals and objectives.



Recordkeeping Requirements

Island Acoustics, LLC fully understands that companies with eleven (11) or more employees at any time during the calendar year immediately preceding the current calendar year must comply with the provisions of 29 CFR 1904. Records shall be established on a calendar year basis.

OSHA Recordkeeping

Island Acoustics, LLC will maintain a log of occupational injuries and illnesses under 29 CFR 1904.2 and to make reports under 29 CFR 1904.21 upon being notified in writing by the Bureau of Labor Statistics that the employer has been selected to participate in a statistical survey of occupational injuries and illnesses.

Jobsite Responsibilities

- Provide the necessary first aid.
- Assist in the transport of the employee to our company's medical or emergency service provider or, if necessary, call the designated emergency number.
- If possible, remain with the employee during the initial treatment. Be empathetic and reassuring.
- If the injury is serious or resulted in a fatality, contact our office, safety director and/or our insurance broker
- If appropriate, arrange transportation so the injured employee can get home.
- Secure the area in which the injury occurred to prevent a reoccurrence and identify all witnesses.

Log & Summary of Occupational Injuries & Illnesses (OSHA 300 Log)

The log shall be used for classifying occupational injuries and illnesses, and for noting the extent of each case. The log shows when the occupational injury or illness occurred, to whom, the regular job of the injured or ill person at the time of the injury or illness exposure, the department in which the person was employed, the kind of injury or illness, how much time was lost, whether the case resulted in a fatality, etc.

Island Acoustics, LLC safety director will:

Maintain a log and summary of all recordable occupational injuries and illnesses by calendar year.

The form shall be updated to include newly discovered cases and to reflect changes that occur in recorded cases after the end of the calendar year. Although all OSHA injury and illness records shall be retained, only the log must be updated.

If, during the 5-year retention period, there is a change in the extent or outcome of an injury or illness which affects an entry on a previous year's log, then the first entry shall be lined out and a corrected entry made on that log. New entries for previously unrecorded cases that are discovered shall also be documented. Log totals shall also be modified to reflect these changes.



Island Acoustics, LLC

Section 8: Accident, OSHA Record Keeping Policy & First Aid Policy

Enter each recordable injury and illness on the log and summary as early as practicable but no later than 5 working days after receiving information that a recordable injury or illness has occurred. For this purpose the OSHA Form No. 300 or an equivalent which is as readable and comprehensible to a person not familiar with it shall be used. The log and summary shall be completed in the detail provided in the form and instructions on form(s) OSHA No. 300/300A.

Supplementary Records (OSHA 101 Accident Investigation Report)

In addition to the log of occupational injuries and illnesses (OSHA 300/300A) Island Acoustics, LLC will have available, at each of our projects, within 6 working days after receiving information that a recordable case has occurred, a supplementary record for each occupational injury or illness for that establishment.

The record shall be completed in the detail prescribed in the instructions accompanying Occupational Safety and Health Administration OSHA Form No. 301. Workmen's compensation, insurance, or other acceptable alternative records if they contain the information required by OSHA Form No. 301 (according to OSHA).

Accident Reporting

- ✓ The office and Mr. Michael Cuttita, corporate safety director must be notified within a one-hour period if an individual has had an accident that will require medical treatment from a hospital or Doctors office.
- ✓ A preliminary report must be filled out by the project superintendent or foreman and faxed, or pictured e-mail or texted to the office and the safety director the same day the accident occurs.
- ✓ When filling out the accident report you must be specific in describing the injury. Identify the type of injury (i.e.: laceration, bruise, fracture), if medication was prescribed, and if lost time was involved or light duty requested by an attending physician.
- ✓ Submit medical reports and Work Modification Forms to the office and Mr. Michael Cuttita.
- ✓ Remember to maintain the OSHA logs.

Annual Summary

Island Acoustics, LLC will post an annual summary of injuries and illnesses for each project under our control. This summary shall consist of a copy of the year's totals from the form OSHA No. 300 and the following information from that form:

- ✓ Calendar year covered.
- ✓ Company Name and establishment address.
- ✓ Certification signature, title, and date.

An OSHA No. 300A form shall be used in presenting the summary. If no injuries or illnesses occurred in the year, zeros shall be entered on the totals line, and the form posted.

The summary will be completed by February 1 of each calendar year. Island Acoustics, LLC shall certify that the annual summary of occupational injuries and illnesses is true and complete. The certification shall be accomplished by affixing the signature of the employer, or the officer or employee who supervises the preparation of the annual summary



of occupational injuries and illnesses, at the bottom of the last page of the log and summary or by appending a separate statement to the log and summary certifying that the summary is true and complete.

Island Acoustics, LLC will post a copy of the establishment's summary in each facility in the manner required under OSHA. The summary covering the previous calendar year shall be posted no later than February 1, and shall remain in place until at least March 1.

Records Retention

Records maintained by Island Acoustics, LLC will be retained for the following time periods following the end of the year to which they relate:

- > Log and summary of all recordable occupational injuries and illnesses (OSHA 300 or equivalent) 5 years.
- Supplementary records (OSHA 301 or equivalent) for each occupational injury or illness for this company-5 years.
- Employee exposure and medical records for Island Acoustics, LLC employees 30 years.

Access to Records

Island Acoustics, LLC will provide, upon request, records for inspection and copying by any representative of the Secretary of Labor for the purpose of carrying out the provisions of the OSHA Act, and by representatives of the Secretary of Health, Education, and Welfare, or by any representative of a State accorded jurisdiction for occupational safety and health inspections or for statistical compilation.

The log and summary of all recordable occupational injuries and illnesses (OSHA No. 300 or 300A) shall, upon request, be made available to any employee, former employee, and to their representatives, for examination and copying in a reasonable manner and at reasonable times. The employee, former employee, and their representatives shall have access to the log for any establishment in which the employee is or has been employed.

Reporting Of Fatality or Accidents

Island Acoustics, LLC will report to OSHA accident that meet the following criteria:

All work-related fatalities within 8 hours

All work-related inpatient hospitalizations, all amputations and all losses of an eye within 24 hours.

We will report the above mentioned occurrences via the following options:



Calling OSHA's free and confidential number at 1-800-321-OSHA (6742).

- 1. Calling your closest Area Office during normal business hours.
- 2. Using the new OSHA online form found on their website: osha.gov.

We will be prepared to supply the following information to OSHA at the time of notification:

Business name; names of employees affected; location and time of the incident, brief description of the incident; contact person and phone number.

It is understood that the Area Director may require such additional reports, in writing or otherwise, as he/ she deems necessary concerning the accident.

Recordability and Classifications Case Analysis

The following decision logic shall be followed:

- ✓ Determine whether a case occurred (death, injury, illness). And establish that the case was work related.
- ✓ Case resulting from an event or exposure in the work environment. In addition to the physical location, equipment or materials used in the course of an employee's work are also considered part of the employee's work environment.
- Case resulting from an event or exposure in other locations where employees are engaged in work-related activities or are present as a condition of their employment.

Establishing That the Case Was Not Work Related

The case shall be considered not work related when an employee is off duty on our premise as a member of the general public and not as an employee.

The case shall be considered to be not work-related when an employee has symptoms that merely surface on Island Acoustics, LLC premises, but are the result of a non work related event or exposure off the premises.

Determining If the Case Is an Illness or Injury

<u>Illness cases.</u> Illnesses usually result from a long term exposure or cases where the illness does not develop as the result of an instantaneous event. This concept of illness includes acute illnesses that result from exposures of relatively short duration.

<u>Injury cases.</u> Injuries are only required to be recorded when they require medical attention (other than first aid). Injuries are usually caused by instantaneous events in the work environment. Cases resulting from anything other than instantaneous events are considered illnesses. This concept of illness includes acute illnesses that result from exposures of relatively short duration.

Determining If a Case Is OSHA Recordable



The following criteria shall be used as a basis for recordability. The case shall be recorded on the OSHA 300 Log if the employee has:

- A work related injury, AND
- Medical treatment other than first aid, OR
- Has a loss of consciousness, OR
- Experiences restriction of work or motion, OR
- Been transferred to another job.

Illness Case

Generally, occupationally induced illnesses should be recorded as a separate entry on the OSHA 300 log. However, certain illnesses, such as silicosis, may have prolonged effects which recur over time. The recurrence of these symptoms shall not be recorded as new cases on the OSHA form. The recurrence of symptoms of a previous illness may require adjustments of entries on the log for previously recorded illnesses to reflect possible change in the extent or outcome of the particular case.

Categories for Evaluating the Extent of Recordable Cases

Once Island Acoustics, LLC decides that a recordable injury or illness has occurred, the case must be evaluated to determine its extent or outcome. There are three categories that OSHA recognizes as recordable cases. Every recordable case shall be placed in only one of the following categories:

Fatalities

All work fatalities must be recorded, regardless of the time between the injury and the death, or the length of the illness.

Lost Workday Cases

Lost workday cases shall be determined to have occurred when the injured or ill employee experiences either days away from work due to the injury or illness, days of restricted work activity due to the injury or illness, or both.

Cases Not Resulting In Death or Lost Workdays

These cases consist of the relatively less serious injuries and illnesses which satisfy the criteria for recordability but which do not result in death or require the affected employee to have days away from work or days of restricted work activity beyond the date of injury or onset of illness.

Return to Work Program

It is the policy of Island Acoustics, LLC to provide employees that fall under the above category the opportunity to return back to work. Based upon the severity of the alleged injury, supervisors and/or the corporate safety director, Mr. Michael Cuttita will contact the employee, (via phone or mail) and provide the individual with an opportunity to return to work. Provisions will be made for light and restricted duty on a case by case basis.

Return to Work Program

A temporary alternative duty program is a transitional collection of jobs or tasks that can be accomplished by an injured employee during his or her recovery from the injury. This will include modified tasks from the employees existing job or parts of jobs from other position within the company. The goal of light duty work is to meet the



injured employees' restrictions until he or she can return to their full time job, or has been issued permanent restrictions by a medical professional.

Coordination and communication between the employee's treating physician or heath care provider is a key element in the effectiveness of the Return to Light Duty Program. The medical provider determines the employee's medical condition, capacity to perform work and the restrictions they should follow. Physicians are required to provide the employer and the insurer with a written post-injury response stating the employee's exact restrictions. This notification allows the employer to take the necessary action to modify the employee's duties to comply with the

restrictions. Any questions on medical restrictions must be resolved through immediate communication with the physician.

At no time shall an employee lose work so that work may be created for an injured



IF AN EMPLOYEE IS INJURED AT WORK

Prompt reporting of work-related injuries and illnesses and the use of <u>all</u> appropriate and available medical provisions will ensure the safety and health of your employee.

To ensure that the employee is taken care of in the best way possible, before starting any job be sure that all of your insurance paperwork is up-to-date and a copy of all certificates are filed with your contractor <u>before</u> work starts.

Whenever an Employee suffers a work-related injury or illness, the Employer should:

- 1. Seek appropriate medical care for the Employee.
- 2. If the injury is acute, the Employer should always send the employee to the nearest hospital emergency department. If an onsite trailer is available, the employee should be sure to document the injury with the General Contractor's nurse.
- 3. If the injury is superficial, you or Island Acoustics should have a comprehensive First Aid kit available.
- 4. An accident/incident report should be made within 24 hours of the injury.
- 5. A C-2 (first report of injury) should be filed within 7 days if the injury results in a loss of more than 1 day's work past the day of injury or more than 2 doctor visits. (see First Aid Claims below).

FIRST AID CLAIMS

The Workers Compensation Law provides the employer with an option regarding small claim exposure. An employer is not required to file a claim form (C-2) if an injury results in lost time one day beyond the working day or shift (24 hour period after the end of the shift or workday) on which the accident occurred, or will not require medical treatment beyond ordinary first aid or 2 treatments. A record however must be kept by the employer and submitted to their carrier and the Workers Compensation Board if there is a change in the status of the employee's claim. (WBC regulation)

CLAIMS PROCEDURES

If an employee suffers an injury, an incident report should be immediately filed. If the injury only requires a first aid treatment then the report does not need to be filed with the Workers Compensation Board per the regulations above. A copy must be maintained at jobsite and filed with the Office, if a change in status occurs. A verbal communication is necessary though and a copy of the incident report made available if needed.

If a C-2 is filed outside of the Office, a copy should be sent to the following for our information:

ISLAND ACOUSTICS

518 Johnson Avenue Bohemia, NY 11716



Island Acoustics, LLC Section 8: Accident, First Aid & Record Keeping Policy

ISLAND ACOUSTICS, LLC 518 Johnson Ave., Bohemia, NY 11716 Tel: (631) 234-4500 Fax: (631) 234-4511 ACCIDENT/INCIDENT REPORT Project Name: Job Site Address: Employee Name: Address: Phone Number: Social Security #: Date of Birth: Male: Female: Date of Hire: Date of Accident: Time of Accident: A.M. Please circle all that apply Body Part Type of Injury Cause of Injury Allergy Multiple Abdomen Finger(s) Leg(s) Struck By Falling Object Burn Crush Pinch Arm(s) Foot Neck Improper Use or Method Struck By Moving Object Shoulder Back Hand(s) Puncture Sprain/Strain Other Elbow(s) Head Toe(s) Material Handling Eye(s) Hip Wrist(s) Other: Specific Details of Injury (right side, left side, index finger, etc.): How Accident Occurred (Describe what employee was doing when injured): Describe the object(s) that directly injured the employee (machine, equipment, material, etc.) Medical Care Provided? Circle one: Yes If Yes, Date: Doctor: Name and Address Hospital: Name and Address Island Acoustics, LLC Company Foreman Name and Signature Date of this Report Date Foreman/Super First Knew of Injury Name (Print) and Title

WORKERS COMP & FIRST A 2021	ID LISTING															
WC First Aid OCIP CCIP Reported Travelers																
					Date of Injury or		Describe injury or illness, parts of body affected, and object/substance that directly injured or made person III je.g. Second degree burns on right forearm		Last Da	,			WC Insurance		First Aid	
Type	WC Carrier Case#	Last Name	first	Job Title	Cruset of House	Where event occurred (e.g. loading dock)	from acetylene torch)	Time Le	wt Worked	RTW Date	Foreman	Insured	Co. Name	Jeb Site	Paid	Mates After failing, Joe saw on site medic who advised fem to go to urgent care, City MD gave
	If Applicable	Brown	Joe	Carpenter	4/1/2021		fell over electrical cord, fell and sliced his right hand on metal track causing lacoration	6	4/1/21	4/6/21	Bob Run	ABC Insurance	If Applicable	Phelps		"x" amount of stitches, wrapped hand and told to lice and elevate. Stitches to be removed
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Island Acoustics, LLC Section 9: Personal Protective Equipment Policy

PERSONAL PROTECTIVE EQUIPMENT

The need to enforce the use of personal protective equipment (PPE) must be done on a daily basis. The purpose of PPE is to minimize employee exposure to possible hazards while performing their jobs and help prevent the possibility of injury.

HARD HATS

ANSI approved hard hats and eye protection must be worn at ALL TIMES on ALL JOBS by ALL EMPLOYEES.

FALL PROTECTION POLICY

Island Acoustics, LLC is committed to the philosophy of continuous fall hazard control wherever the potential exists for an employee fall from a height of <u>six feet or greater</u>. Accordingly, Island Acoustics, LLC will take all practical measures to eliminate, prevent and control fall hazards. Work sites and activities shall be surveyed to identify all hazards of personnel falling from elevations. First consideration shall be given to the elimination of those hazards. If a fall hazard cannot be practically eliminated, second consideration will be given to implementing an effective permanent means of fall prevention.

If a fall hazard cannot be eliminated or fall prevention assured, then an effective personal fall protection system shall be planned, implemented and carefully monitored to control the risks of personnel injury due to falls. Fall protection systems will be continuous by design and supervision shall control against their intermittent or improper use.

All personnel and management staff who are working where fall hazards cannot be eliminated or the onset of falls prevented, shall be uniformly equipped, trained, and given refresher training at specified intervals to minimize adverse effects or accidental falls. Fall protection equipment and compliance will be in accordance with OSHA standards. <u>ALL</u> Subcontractors will be required to comply with our Fall Protection Program to work on our projects.

STAIRWAY AND LADDER POLIC

Stairways and ladders are a major source of injuries and fatalities among construction workers.

OSHA estimates that there are 24,882 injuries and as many as 36 fatalities per year due to falls from stairways and ladders used in construction. Nearly half of these injuries are serious enough to require time off the job -- 11,570 lost workday injuries and 13,312 non-lost workday injuries occur annually due to falls from stairways and ladders used in construction. This data demonstrates that work on and around ladders and stairways is hazardous. More importantly, they show that compliance with OSHA'S requirements for the safe use of ladders and stairways could have prevented many of these injuries.

All employees will be trained in the proper use of ladders and stairways.



THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) REQUIRES THAT ALL EMPLOYERS DEVELOP AND IMPLEMENT A WRITTEN HAZARD COMMUNICATION PROGRAM. THE ISLAND ACOUSTICS, LLC'S HAZARD COMMUNICATION PROGRAM IS DESIGNED TO COMPLY WITH AND ENFORCE THE REQUIREMENTS OF THE OSHA STANDARD WITHIN THIS ORGANIZATION.

Employees are our company's most important assets; their safety and health our greatest responsibility. In respect to the policy of our company which states that every employee is entitled to a safe and healthy workplace, we have initiated an Employee Hazard Communication Training Program which all employees must participate in. When employees enter our employ, they have a Right-To-Know what hazardous chemicals they work with, or could be exposed to.

The purpose of this Training Program is to ensure that all employees:

- 1. receive as much information as needed concerning the possible hazards in their workplace,
- 2. know what hazardous materials they work with or could be exposed to,
- 3. know what they can and should do to avoid injury or illness when working with or around these materials.

We provide this information and training in order to reduce the possibility of accidental exposure and to comply with the OSHA Hazard Communication Standard.

Successful results from our Hazard Communication Program will depend on the active support and involvement of all company personnel working together to accomplish our goals of providing and maintaining a safe and healthy workplace.

ALL EMPLOYEES WILL BE TRAINED IN OUR HAZARD COMMUNICATION POLICY.

A COPY OF OUR PROGRAM IS AVAILABLE FOR YOUR USE.

ALL SAFETY DATA SHEETS (SDS) FOR PROJECTS ARE ON FILE IN THE OFFICE TRAILER FOR YOUR USE AND REVIEW.





GENERAL: Island Acoustics, LLC shall ensure that the hazards of all chemicals used within our facility are evaluated, and that information concerning their hazards is transmitted to all employees. This program is intended to address comprehensively the issues of evaluating the potential hazards of chemicals, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

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- 1. Written Program.
- 2. Training Program.
- 3. Labeling Program.
- 4. Safety Data Sheets Program.
- 5. Non-Company Employees Program.
- 6. Trade Secrets.
- 7. Definitions including Global Harmonization System Update Terms
- 8. Sample Letter Requesting an SDS
- 1. Written Program. This program shall be maintained in accordance with 29 CF1910.1200, the Global Harmonization System and updated as required. Where no update is required this document shall be reviewed annually. Effective implementation of this program requires support from all levels of management at Island Acoustics, LLC

This written program shall be communicated to all personnel that are affected by it. It encompasses the total workplace, regardless of the number of workers employed or the number of work shifts. It is designed to establish clear goals and objectives. Island Acoustics, LLC shall:

1.1. Annually review and revise this written hazard communication program based on Island Acoustics, LLC operational requirements or as required by the OSHA Hazard Communication Standard.



- 1.2. Provide a program for the proper labeling of containers, describe other needed forms of warning, and detail the use and purpose of Safety Data Sheets (SDS). Describe how employee information and training requirements shall be met, to include the following:
 - 1.2.1. Generate a list of the hazardous chemicals known to be present at each jobsite using an identity that is referenced from the appropriate SDS. This list shall be available to all employees at the site and/or facility, and shall be located as a minimum at the site/facility "Worker Right-To-Know Center".
 - **1.2.2.** Detail the method Island Acoustics, LLC shall use to inform employees of the hazards of non-routine tasks. **PLEASE SEE HAZ-COMM TRAINING ADDENDUM AT THE END OF THIS SECTION.**
 - 1.2.3. It is the responsibility of others to notify our employees of the hazards associated with chemicals contained in process or facility piping routed through their work area. Immediate supervisors of affected employees shall oversee this requirement. The Safety Director may be consulted to provide any hazard analysis assistance required. Any unlabeled pipes in their work areas must be immediately reported to the respective contractor assigned "competent person" for labeling.
 - 1.2.4. The methods Island Acoustics, LLC shall use to inform employee(s) of any precautionary measures that need to be taken to protect employees during normal operating conditions and in foreseeable emergencies. Immediate supervisors of affected employees shall oversee this requirement. The Project Manager and/or the Safety Director may be consulted to provide any task hazard analysis assistance required.
 - 1.2.5. Island Acoustics, LLC shall make the written hazard communication program available to all employees, during each work shift.
- **2. Training Program.** Island Acoustics, LLC shall provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment, annually, and whenever a new chemical is introduced into their work area that could present a potential hazard.
 - 2.1. **Information.** Island Acoustics, LLC employees shall be informed of:
 - 2.1.1. Any operations in their work area where hazardous chemicals are present.
 - 2.1.2. The location and availability of the written hazard communication program, including a list of hazardous chemicals used at their jobsite and the associated Safety Data Sheets (SDS). This information shall be centrally located at each Island Acoustics, LLC jobsite in a "Worker Right-To-Know Center". All employees shall have convenient access to this location and materials during each shift. A chemical list shall be provided.



- 2.2. **Training.** Employee hazard communication training at Island Acoustics, LLC shall be conducted annually by the jobsite. This training shall be conducted by an approved training instructor. Newly hired personnel shall be briefed on the general requirements of the OSHA hazard communication standard by the Project Manager or Superintendent, as well as duty specific hazards by their immediate supervisor before they begin any duties at the jobsite. Jobsite transferred personnel shall also be briefed on the duty specific hazards by their immediate supervisor before they begin any new duties. This training shall include at least the following:
 - 2.2.1. Methods (subjective and objective) that may be used to detect the presence or release of a hazardous chemical in the work area. This shall include any continuous monitoring devices, visual appearance of substance, or odor of hazardous chemicals when being released, etc... SDS shall be used to augment this requirement where ever possible.
 - 2.2.2. The physical and health hazards of the chemicals present in the work area (SDS).
 - 2.2.3. The measures employees can take to protect themselves from these hazards. Specific procedures Island Acoustics, LLC has implemented to protect employees from exposure to hazardous chemicals, to include but not be limited to, appropriate work practices, policies, emergency procedures, and personal protective equipment (PPE).
 - 2.2.4. An explanation of the labeling system used at Island Acoustics, LLC, the SDS, and how employees can obtain and use the appropriate hazard information.
 - 2.2.5. The chemical (formal) and common name(s) of products used, and all ingredients which have been determined to be health hazards.
 - 2.2.6. Physical and chemical characteristics of the hazardous chemical including vapor pressure and flash point.
 - 2.2.7. The physical hazards of the hazardous chemical, including the potential for fire, explosion, and reactivity.
 - 2.2.8. The health hazards of the hazardous chemical, including signs and symptoms of exposure, and any medical conditions which are generally recognized as being aggravated by exposure to the chemical.
 - 2.2.9. The primary route(s) of entry; inhalation, absorption, injection, and target organs.
 - 2.2.10. The OSHA Permissible Exposure Limit (PEL), ACGIH Threshold Limit Value (TLV), including any other exposure limit used or recommended by the chemical manufacturer.
 - 2.2.11. Whether the hazardous chemical has been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC).



- 2.2.12. Any generally applicable precautions for safe handling and use which are known, including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment, and procedures for clean-up of spills and leaks.
- 2.2.13. Any generally applicable control measures which are known appropriate engineering controls, work practices, or PPE.
- 2.2.14. Emergency and first aid procedures.
- 2.2.15. How to determine the date of preparation of the SDS concerned, and/or the last change to it.
- 2.2.16. Specific chemical identity such as the chemical name, Chemical Abstract Service (CAS) Registry Number, synonyms, or any other information pertinent to the training session.
- 2.2.17. The Global Harmonization System and Pictogram Labels.
- 2.3 Documentation. All training shall be documented using a standard company attendance roster. Certificates of completion shall be issued to attendees. A copy of the completion certificate shall be maintained as part of the employee's permanent company record.

3. Labeling Requirements.

Labeling requirements of containers of chemicals used at Island Acoustics, LLC, as well as of containers of chemicals and hazardous materials being shipped off site. The following procedures apply:

- 3.1. Unmarked Containers. No unmarked container containing chemicals may be used in conjunction with any duties or operations at Island Acoustics, LLC unless the container is a portable container in the control of a specific person for their immediate use. Container means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For the purposes of this program, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers. Immediate use means that the hazardous chemical shall be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
- 3.2. Container Labeling. Island Acoustics, LLC shall maintain and provide a container labeling kit to any employee requesting its use. Employees shall ensure that labels on incoming containers of hazardous chemicals are not removed or defaced. Containers containing hazardous chemicals shall be properly disposed of and their labels defaced after use. Once they are emptied, chemical containers can never be used in the place of any other container (for example, trash receptacles).
- 3.3. **Label Information for A Single Chemical (Non-Mixture).** Island Acoustics, LLC shall provide the appropriate hazard rating and chemical compatibility charts to label containers. The SDS shall be consulted first to determine labeling requirements. The label as a minimum shall contain:



- 3.3.1 Information concerning the PPE required to use or handle the chemical.
- 3.3.2 The DOT hazard class i.e., whether the chemical is Flammable, Toxic, Irritating, Corrosive, Water Reactive, or is an Oxidizer.
- 3.3.3 The chemical name as reflected on the SDS.
- 3.3.4 The normal operational use of the chemical.
- 3.3.5 Pictograms in accordance with the Global Harmonization System.
- 3.4. **Label Information (Mixtures).** Island Acoustics, LLC shall provide the appropriate hazard rating and chemical data to label containers. The SDS of the chemicals used to create the mixture shall be consulted first to determine labeling requirements, see paragraph 3.3.
 - 3.4.1. If a mixture has been tested by an approved laboratory as a whole to determine its hazardous characteristics, the results of such testing shall be used to determine whether the mixture is hazardous and to provide the appropriate labeling information.
 - 3.4.2. If a mixture has not been tested as a whole to determine whether the mixture is a health hazard, the mixture shall be assumed to present the same health hazards as do the components which comprise one percent (by weight or volume) or greater of the mixture. Scientifically valid data such as that provided on the SDS to evaluate the physical hazard potential of the mixture must be used. The Safety/Environmental Administrator may be consulted to provide any hazard analysis assistance required.
- 3.5. Where Labels Are Not Required. Questions concerning any of the exceptions listed below should be directed to the Safety Administrator for clarification. Island Acoustics, LLC generally should not be affected by these requirements, however they are provided for information and because they are included in the Hazard Communication Standard. The Hazard Communication Standard does not require labeling of the following chemicals:
 - 3.5.1. Any pesticide as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.), when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Environmental Protection Agency,
 - 3.5.2. Any food, food additive, color additive, drug, cosmetic, or medical or veterinary device or product, including materials intended for use as ingredients in such products (e.g. flavors and fragrances), as such terms are defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.) or the Virus-Serum-Toxin Act of 1913 (21 U.S.C. 151 et seq.), and regulations issued under those Acts, when they are subject to the labeling requirements under those Acts by either the Food and Drug Administration or the Department of Agriculture;



- 3.5.3. Any distilled spirits (beverage alcohols), wine, or malt beverage intended for nonindustrial use, as such terms are defined in the Federal Alcohol Administration Act (27 U.S.C. 201 et seq.) and regulations issued under that Act, when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Bureau of Alcohol Tobacco, and Firearms.
- 3.5.4. Any consumer product or hazardous substance as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, when subject to a consumer product safety standard or labeling requirement of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission.
- 3.6. Labeling Of Containers Of Chemicals And Hazardous Materials Being Shipped Off Site Designated As Hazardous Waste. Where these materials are classified as hazardous waste they fall under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), and the provisions of 40 CFR. And as such shall be subject to regulations issued under that Act by the Environmental Protection Agency. Consult with the Safety and Environmental Administrator where this determination is unclear or assistance is required.

4. Evaluation and Distribution of Safety Data Sheets to Employees.

- 4.1. Island Acoustics, LLC shall maintain copies of any SDS that are received with incoming shipments of the sealed containers of hazardous chemicals, shall obtain a SDS for sealed containers of hazardous chemicals received without a SDS if an employee requests the SDS, and shall ensure that the SDS are readily accessible during each work shift.
- 4.2. Each SDS shall be entered into the SDS log book maintained at the jobsite. Island Acoustics, LLC employees shall have access to this book upon request.

SDS and Non-Company Personnel Procedures

- 4.3. Master copies of each SDS shall be maintained at the field office.
- 4.4. Right-To-Know (worker) copies shall be available to all employees at the site.
- 4.5. SDS copies shall be maintained for all chemicals abandoned for use for a period of 30 years.
- 4.6. SDS requests. A request letter shall be forwarded to any vender who does not provide an SDS with a product received by this company. The letter shall be forwarded within three (3) days of receipt of the material. The format shall be the same as the sample letter located at the back of this instruction.
- 4.7. Employees must be familiar with the various 16 sections of the SDS as required under the new OSHA Standard and Global Harmonization System.



Solution Non-Company Personnel Program. Visitors, Contract Employees, Contractor Personnel and in-house Representatives. The principle company escort or contact shall advise visitors, contract employees, contractor personnel, and in-house representatives of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and availability of SDS. Any contractor bringing chemicals on-site must provide Island Acoustics, LLC with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals. Consult with the Safety Director where this determination is unclear or assistance is required.

Trade Secrets

- **6. Trade Secrets**. To protect trade secrets, the chemical manufacturer, importer, or employer may withhold the specific chemical identity, including the chemical name and other specific identification of a hazardous chemical, from the SDS. To ensure the safety of our employees, Island Acoustics, LLC shall obtain any information not shown on a SDS from a supplier when such information is needed to determine the hazardous constituents of chemicals used within our facility or by our employees. Island Acoustics, LLC employees shall not use a specific chemical if they cannot determine from the SDS (or other approved source) proper protective measures to be used. The following conditions apply:
 - 6.1. Emergency Situations. Where a treating physician or nurse determines that a medical emergency exists and the specific chemical identity of a hazardous chemical is necessary for emergency or first-aid treatment, Island Acoustics, LLC suppliers are required by law to immediately disclose the specific chemical identity of a trade secret chemical to that treating physician or nurse, regardless of the existence of a written statement of need of a confidentiality agreement.
 - 6.2. **Non-Emergency Situations.** The following OSHA guidelines apply when requesting information designated as a trade secret from a SDS. Requesters of trade secret information shall:
 - 6.2.1. Provide the request in writing.
 - 6.2.2. Explain in detail why the disclosure of the specific chemical identity is essential.
 - 6.2.3. Agree (when required) in a written confidentiality agreement that the information shall not be used for any purpose other than the health need(s) asserted and agree not to release the information under any circumstances other than to OSHA, as provided in 29 CFR 1910.1200.
 - 6.2.4. Use the information for the following reasons:
 - 6.4.2.1. To assess the hazards of the chemicals to which employees shall be exposed.
 - 6.4.2.2. To conduct or assess sampling of the workplace atmosphere to determine employee exposure levels
 - 6.4.2.3. To provide medical treatment to exposed employees.



- 6.4.2.4. To select or assess appropriate PPE for exposed employees.
- 6.4.2.5. To select or improve engineering controls or other protective measures for exposed employees, and to conduct studies to determine the health effects of exposure.

7. Definitions Commonly Found In The OSHA Hazard Communication Standard Or That Relate To The Contents Of The Standard.

Article means a manufactured item:

- 1. Which is formed to a specific shape or design during manufacture.
- 2. Which has end use function(s) dependent in whole or in part upon its shape or design during end use.
- 3. Which does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.

Assistant Secretary means the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee.

Chemical means any element, chemical compound or mixture of elements and/or compounds.

Chemical Manufacturer means an employer with a workplace where chemical(s) are produced for use or distribution.

Chemical Name means the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which shall clearly identify the chemical for the purpose of conducting a hazard evaluation.

Combustible Liquid means any liquid having a flashpoint at or above 100 F (37.8 C), but below 200 F (93.3 C), except any mixture having components with flashpoints of 200 F (93.3 C), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.



Common Name means any designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.

Compressed Gas means:

- 1. A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 psi at 70 F (21.1 C); or
- 2. A gas or mixture of gases having, in a container, an absolute pressure exceeding 104 psi at 130 F (54.4 C) regardless of the pressure at 70 F (21.1 C); or
- 3. A liquid having a vapor pressure exceeding 40 psi at 100 F (37.8 C) as determined by ASTM D-323-72.

Designated Representative means any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this section. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

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

Distributor means a business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.

Employee means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

Employer means a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

Explosive means a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.

Exposure or Exposed means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes potential (e.g. accidental or possible) exposure.



Flammable means a chemical that falls into one of the following categories:

1. **Aerosol, flammable** means an aerosol that, when tested by the method described in 16 CFR 1500.45, yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening.

2. **Gas, flammable** means:

- a) A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less.
- b) A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit.
- 3. **Liquid, flammable** means any liquid having a flashpoint below 100 F (37.8 C), except any mixture having components with flashpoints of 100 F (37.8 C) or higher, the total of which make up 99 percent or more of the total volume of the mixture.
- 4. **Solid, flammable** means a solid, other than a blasting agent or explosive as defined in § 190.109(a), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be considered to be a flammable solid if, when tested by the method described in 16 CFR 1500.44, it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

Flashpoint means the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite when tested as follows:

1. **Tagliabue Closed Tester** (See American National Standard Method of Test for Flash Point by Tag Closed Tester, Z11.24-1979 (ASTM D 56-79)) for liquids with a viscosity of less than 45 Saybolt University Seconds (SUS) at 100 F (37.8 C), that do not contain suspended solids and do not have a tendency to form a surface film under test; or



- 2. **Pensky-Martens Closed Tester** (See American National Standard Method of Test for Flash Point by Pensky-Martens Closed Tester, Z11.7-1979 (ASTM D 93-79)) for liquids with a viscosity equal to or greater than 45 SUS at 100 F (37.8 C), or that contain suspended solids, or that have a tendency to form a surface film under test; or
- 3. **Setaflash Closed Tester** (see American National Standard Method of Test for Flash Point by Setaflash Closed Tester (ASTMD 3278-78)). Organic peroxides, which undergo auto accelerating thermal decomposition, are excluded from any of the flashpoint determination methods specified above.

Foreseeable Emergency means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.

Hazardous Chemical means any chemical which is a physical hazard or a health hazard.

Hazard Warning means any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the hazard(s) of the chemical(s) in the container(s).

Health Hazard means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term health hazard includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes. Appendix A, to 29 CFR 1910.1200 provides further definitions and explanations of the scope of health hazards covered by this section, and Appendix B, 29 CFR 1910.1200 describes the criteria to be used to determine whether or not a chemical is to be considered hazardous for purposes of this program.

Identity means any chemical or common name which is indicated on the Safety Data Sheet (SDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the SDS.

Immediate Use means that the hazardous chemical shall be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.



Importer means the first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.

Label means any written, printed, or graphic material, displayed on or affixed to containers of hazardous chemicals.

Safety Data Sheet (SDS) means written or printed material concerning a hazardous chemical which is prepared in accordance with the latest OSHA requirements and the Global Harmonization System.

Mixture means any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

Organic Peroxide means an organic compound that contains the bivalent -O-O-structure and which may be considered to be a structural derivative of hydrogen peroxide where one or both of the hydrogen atoms has been replaced by an organic radical.

Oxidizer means a chemical other than a blasting agent or explosive as defined in 29 CFR 1910.109(a), that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.

Physical Hazard means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Produce means to manufacture, process, formulate, or repackage.

Responsible Party means someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.

Specific Chemical Identity means the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

Trade Secret means any confidential formula, pattern, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.

Unstable (**Reactive**) means a chemical which in the pure state, or as produced or transported, shall vigorously polymerize, decompose, condense, or shall become self-reactive under conditions of shocks, pressure or temperature.

Use means to package, handle, react, or transfer.

Water-Reactive means a chemical that reacts with water to release a gas that is either flammable or presents a health hazard. Often when the water is heated it goes into a gaseous state allowing oxygen to be released which can help feed a fire.



Work Area means a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

Work Place means an establishment, job site, or project, at one geographical location containing one or more work areas.

NEW: The **Globally Harmonized System of Classification and Labelling of Chemicals (GHS)** is an internationally agreed-upon system, created by the United Nations beginning in 1992 and as of 2015 is not yet fully implemented in many countries. It was designed to replace the various classification and labelling standards used in different countries by using consistent criteria on a global level. It supersedes the relevant system of the European Union, which has implemented the United Nations' GHS into EU law as the CLP Regulation and United States Occupational Safety and Health Administration standards.

Hazard classes

Substances or articles are assigned to 9 different hazard classes largely based on the United Nations Dangerous Goods System. [3]:59-60 Additions and changes have been necessary since the scope of the GHS includes all target audiences.

- 1. **Explosives**, which are assigned to one of six subcategories depending on the type of hazard they present, as used in the UN Dangerous Goods System.
- 2. **Gases** are category 1 flammable if they start to flame in a range in air at 20 °C and a standard pressure of 101.3 kPa. Category 2 is Nonflammable and non-toxic gases, and category 3 is toxic gases. Substances and mixtures of this hazard class are assigned to one of two hazard categories on the basis of the outcome of the test or calculation method.
- 3. A **flammable liquid** is a liquid with a flash point of not more than 93 °C. Substances and mixtures of this hazard class are assigned to one of four hazard categories on the basis of the flash point and boiling point. A pyrophoric liquid is a liquid that, even in small quantities, is liable to ignite within five minutes after coming into contact with air. Substances and mixtures of this hazard class are assigned to a single hazard category on the basis of the outcome of the UN Test N.3.
- 4. A **flammable solid** is one that is readily combustible or may cause or contribute to fire through friction. Readily combustible solids are powdered, granular, or pasty substances which are dangerous if they can be easily ignited by brief contact with an ignition source, such as a burning match, and if the flame spreads rapidly. it is further divided into
 - flammable solids,
 - polymerizing substances and
 - self-reactive substances, i.e., thermally unstable solids liable to undergo a strongly exothermic thermal decomposition even without participation of oxygen (air) other than materials classified as explosive, organic peroxides or as oxidizing.



Spontaneously combusting solids or pyrophoric solids are solids that, even in small quantities, are liable to ignite within five minutes after coming into contact with air. Substances and mixtures of this hazard class are assigned to a single hazard category on the basis of the outcome of the UN Test N.2. Self-heating substances are solids or liquids, other than a pyrophoric substance, which, by reaction with air and without energy supply, are liable to self-heat. Substances and mixtures of this hazard class are assigned to one of two hazard categories on the basis of the outcome of the UN Test N.4. Substances which on contact with water emit flammable gases are liable to become spontaneously flammable or to give off flammable gases in dangerous quantities. Substances and mixtures of this hazard class are assigned to one of three hazard categories on the basis of the outcome of UN Test N.5, which measures gas evolution and speed of evolution. Flammable aerosols can be classified as Class 1 or Class 2 if they contain any component, which is classified as flammable.

5. Oxidizing substances and organic peroxides contain

- category 1: oxidizing substances and
- category 2: organic peroxides, organic liquids or solids that contain the bivalent -O-O- structure and may be considered a derivative of hydrogen peroxide, where one or both of the hydrogen atoms have been replaced by organic radicals. The term also includes organic peroxide formulations (mixtures). Substances and mixtures of this hazard class are assigned to one of seven 'Types', A to G, on the basis of the outcome of the UN Test Series A to H.
- 6. Toxic and infectious substances
- 7. Radioactive substances
- 8. **Substances corrosive to metal** are substances or mixtures that by chemical action will materially damage or even destroy metals. These substances or mixtures are classified in a single hazard category on the basis of tests (Steel: ISO 9328 (II): 1991 Steel type P235; Aluminum: ASTM G31-72 (1990) non-clad types 7075-T6 or AZ5GU-T66). The GHS criteria are a corrosion rate on steel or aluminum surfaces exceeding 6.25 mm per year at a test temperature of 55 °C.
- 9. Miscellaneous dangerous substances which includes environmentally dangerous substances

Health hazards

- **Acute toxicity** includes five GHS categories from which the appropriate elements relevant to transport, consumer, worker and environment protection can be selected. Substances are assigned to one of the five toxicity categories on the basis of LD₅₀ (oral, dermal) or LC₅₀ (inhalation).
- **Skin corrosion** means the production of irreversible damage to the skin following the application of a test substance for up to 4 hours. Substances and mixtures in this hazard class are assigned to a single harmonized corrosion category.
- **Skin irritation** means the production of reversible damage to the skin following the application of a test substance for up to 4 hours. Substances and mixtures in this hazard class are assigned to a single irritant category. For those authorities, such as pesticide regulators, wanting more than one designation for skin irritation, an additional mild irritant category is provided.
- **Serious eye damage** means the production of tissue damage in the eye, or serious physical decay of vision, following application of a test substance to the front surface of the eye, which is not fully reversible within 21 days of application. Substances and mixtures in this hazard class are assigned to a single harmonized category.



- **Eye irritation** means changes in the eye following the application of a test substance to the front surface of the eye, which are fully reversible within 21 days of application. Substances and mixtures in this hazard
- class are assigned to a single harmonized hazard category. For authorities, such as pesticide regulators, wanting more than one designation for eye irritation, one of two subcategories can be selected, depending on whether the effects are reversible in 21 or 7 days.
- **Respiratory sensitizer** means a substance that induces hypersensitivity of the airways following inhalation of the substance. Substances and mixtures in this hazard class are assigned to one hazard category.
- **Skin sensitizer** means a substance that will induce an allergic response following skin contact. The definition for "skin sensitizer" is equivalent to "contact sensitizer". Substances and mixtures in this hazard class are assigned to one hazard category.
- **Germ cell mutagenicity** means an agent giving rise to an increased occurrence of mutations in populations of cells and/or organisms. Substances and mixtures in this hazard class are assigned to one of two hazard categories. Category 1 has two subcategories.
- Carcinogenicity means a chemical substance or a mixture of chemical substances that induce cancer or increase its incidence. Substances and mixtures in this hazard class are assigned to one of two hazard categories. Category 1 has two subcategories.
- **Reproductive toxicity** includes adverse effects on sexual function and fertility in adult males and females, as well as developmental toxicity in offspring. Substances and mixtures with reproductive and/or developmental effects are assigned to one of two hazard categories, 'known or presumed' and 'suspected'. Category 1 has two subcategories for reproductive and developmental effects. Materials, which cause concern for the health of breastfed children, have a separate category, Effects on or Via Lactation.
- Specific target organ toxicity (STOT) [4] category distinguishes between single and repeated exposure for Target Organ Effects. All significant health effects, not otherwise specifically included in the GHS that can impair function, both reversible and irreversible, immediate and/or delayed are included in the non-lethal target organ/systemic toxicity class (TOST). Narcotic effects and respiratory tract irritation are considered to be target organ systemic effects following a single exposure. Substances and mixtures of the single exposure target organ toxicity hazard class are assigned to one of three hazard categories. Substances and mixtures of the repeated exposure target organ toxicity hazard class are assigned to one of two hazard categories.
- Aspiration hazard includes severe acute effects such as chemical pneumonia, varying degrees of
 pulmonary injury or death following aspiration. Aspiration is the entry of a liquid or solid directly through
 the oral or nasal cavity, or indirectly from vomiting, into the trachea and lower respiratory system.
 Substances and mixtures of this hazard class are assigned to one of two hazard categories this hazard class
 on the basis of viscosity.

Environmental hazards

• Acute aquatic toxicity means the intrinsic property of a material of causing injury to an aquatic organism in a short-term exposure. Substances and mixtures of this hazard class are assigned to one of three toxicity categories on the basis of acute toxicity data: LC₅₀ (fish) or EC₅₀ (crustacean) or ErC₅₀ (for algae or other aquatic plants). In some regulatory systems these acute toxicity categories may be subdivided or extended for certain sectors.



• Chronic aquatic toxicity means the potential or actual properties of a material to cause adverse effects to aquatic organisms during exposures that are determined in relation to the lifecycle of the organism. Substances and mixtures in this hazard class are assigned to one of four toxicity categories on the basis of acute data and environmental fate data: LC₅₀ (fish) or EC₅₀ (crustacea) or ErC₅₀ (for algae or other aquatic plants) and degradation or bioaccumulation.

Classification of mixtures

The GHS approach to the classification of mixtures for health and environmental hazards is also complex. It uses a tiered approach and is dependent upon the amount of information available for the mixture itself and for its components. Principles that have been developed for the classification of mixtures, drawing on existing systems such as the European Union (EU) system for classification of preparations laid down in Directive 1999/45/EC. The process for the classification of mixtures is based on the following steps:

- 1. Where toxicological or ecotoxicological test data are available for the mixture itself, the classification of the mixture will be based on that data;
- 2. Where test data are not available for the mixture itself, then the appropriate bridging principles should be applied, which uses test data for components and/or similar mixtures;
- 3. If (1) test data are not available for the mixture itself, and (2) the bridging principles cannot be applied, then use the calculation or cutoff values described in the specific endpoint to classify the mixture.

Testing requirements

The GHS document does not include testing requirements for substances or mixtures. In fact, one of the main goals of the GHS is to reduce the need for animal testing. The GHS criteria for determining health and environmental hazards are test method neutral, allowing different approaches as long as they are scientifically sound and validated according to international procedures and criteria already referred to in existing systems. Test data already generated for the classification of chemicals under existing systems should be accepted when classifying these chemicals under the GHS, thereby avoiding duplicative testing and the unnecessary use of test animals. The GHS physical hazard criteria are linked to specific UN test methods. It is assumed that mixtures will be tested for physical hazards.



GHS label elements



Example: The symbol for substances hazardous to the human health as implemented by the GHS.

The standardized label elements included in the GHS are:

- Symbols (GHS hazard pictograms): Convey health, physical and environmental hazard information, assigned to a GHS hazard class and category. Pictograms include the harmonized hazard symbols plus other graphic elements, such as borders, background patterns and substances which have target organ toxicity. [5] Also, harmful chemicals and irritants are marked with an exclamation mark, replacing the European saltire. Pictograms will have a black symbol on a white background with a red diamond frame. For transport, pictograms will have the background, symbol and colors currently used in the *UN Recommendations on the Transport of Dangerous Goods*. Where a transport pictogram appears, the GHS pictogram for the same hazard should not appear.
- **Signal words:** "Danger" or "Warning" will be used to emphasize hazards and indicate the relative level of severity of the hazard, assigned to a GHS hazard class and category. Some lower level hazard categories do not use signal words. Only one signal word corresponding to the class of the most severe hazard should be used on a label.
- **Hazard statements:** Standard phrases assigned to a hazard class and category that describe the nature of the hazard. An appropriate statement for each GHS hazard should be included on the label for products possessing more than one hazard.

The additional label elements included in the GHS are:



- **Precautionary statements**: Measures to minimize or prevent adverse effects. There are four types of precautionary statements covering: prevention, response in cases of accidental spillage or exposure, storage, and disposal. The precautionary statements have been linked to each GHS hazard statement and type of hazard
- **Product identifier (ingredient disclosure):** Name or number used for a hazardous product on a label or in the SDS. The GHS label for a substance should include the chemical identity of the substance. For mixtures, the label should include the chemical identities of all ingredients that contribute to acute toxicity, skin corrosion or serious eye damage, germ cell mutagenicity, carcinogenicity, reproductive toxicity, skin or respiratory sensitization, or Target Organ Systemic Toxicity (TOST), when these hazards appear on the label.
- **Supplier identification:** The name, address and telephone number should be provided on the label.
- **Supplemental information**: Non-harmonized information on the container of a hazardous product that is not required or specified under the GHS. Supplemental information may be used to provide further detail that does not contradict or cast doubt on the validity of the standardized hazard information.

GHS label format

The GHS includes directions for application of the hazard communication elements on the label. In particular, it specifies for each hazard, and for each class within the hazard, what signal word, pictogram, and hazard statement should be used. The GHS hazard pictograms, signal words and hazard statements should be located together on the label. The actual label format or layout is not specified in the GHS. National authorities may choose to specify where information should appear on the label or allow supplier discretion. There has been discussion about the size of GHS pictograms and that a GHS pictogram might be confused with a transport pictogram or "diamond". Transport pictograms are different in appearance than the GHS pictograms. Annex 7 of the Purple Book explains how the GHS pictograms are expected to be proportional to the size of the label text so that generally the GHS pictograms would be smaller than the transport pictograms.

GHS material safety data sheet or safety data sheet

The safety data sheet (The GHS has dropped the word "material" from material safety data sheet. It will now be called the safety data sheet or SDS) is specifically aimed at use in the workplace. It should provide comprehensive information about the chemical product that allows employers and workers to obtain concise, relevant and accurate information that can be put in perspective with regard to the hazards, uses and risk management of the chemical product in the workplace. The SDS should contain 16 sections. While there were some differences in existing industry recommendations, and requirements of countries, there was widespread agreement on a 16 section SDS that includes the following headings in the order specified:

- 1. Identification
- 2. Hazard(s) identification
- 3. Composition/information on ingredients
- 4. First-aid measures
- 5. Fire-fighting measures
- 6. Accidental release measures
- 7. Handling and storage
- 8. Exposure control/ personal protection
- 9. Physical and chemical properties
- 10. Stability and reactivity



- 11. Toxicological information
- 12. Ecological information
- 13. Disposal considerations
- 14. Transport information
- 15. Regulatory information
- 16. Other information.

8. Sample Letter Requesting an SDS.

XYZ Manufacturing Company 1234 Street Anytown, USA 11222

Dear Sir:

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) requires employers be provided Safety Data Sheets (SDS) for all hazardous substances used in their facility and to make these SDS available to employees potentially exposed to these hazardous substances.
We therefore request a copy of the SDS for your product listed as Stock Number We did not receive an SDS with the initial shipment. We also request any additional information, supplemental SDS, or any other relevant data that your company or supplier has concerning the safety and health aspects of this product.
Please consider this letter as a standing request to your company for any information concerning the safety and health aspects of using this product that may become known in the future.
The SDS and any other relevant information should be sent to us within 5 days. Delays may prevent use of your product. Send the information to the address listed below.
Please be advised that if we do not receive the SDS for the above chemical by, we may have to notify OSHA of our inability to obtain this information.
Your cooperation is greatly appreciated. Thank you for your timely response to this request. If you have any questions please contact me at (123) 456-7890.
Sincerely,





General Requirements

All hand and power tools and similar equipment shall be maintained in a safe condition.

Operation of machinery or equipment should conform to the standard operating procedures established by the company who manufactures the equipment. Operation of machinery that deviates from these procedures shall be prohibited. Operation of power tools should conform to standard operating procedures.

The safe operation of power tools, machinery and equipment is mandatory at all times. Any use of these power tools, machinery or equipment for work they are not intended is strictly prohibited and subject to disciplinary action.

When power operated tools are designed to accommodate guards, they shall be equipped with such guards when in use. Should the guard obstruct the work it will not be removed.

Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating or moving parts of equipment shall be guarded if such parts are exposed to contract by employees or other wise create a hazard.

Impact tools, such as drift pins, wedges, and chisels, shall be kept free of mush-roomed heads.

The wooden handles of tools shall be kept free of splinters or cracks and shall be kept tight in the tool.

Where the wearing of gloves creates a possible hazard, they shall not be worn.



Power-operated Hand Tools

Electric power operated tools shall either be the approved double-insulated type or grounded.

Do not use a power tool with broken or defective insulation on the cord, broken or defective plugs, or loose or broken switches.

The use of electric cords for hoisting or lowering tools shall not be permitted.

If the tool is provided with a side mounted handle it must remain on the tool to prevent a wrist injury should the tool bind during operation.

Powder-actuated Tools



Only employees who have been trained in the operation of the particular tool in use shall be allowed to operate a powder-actuated tool. Users should possess a qualified operator's card, which is issued by the manufacturer's representative. Employees working within the five boroughs of New York City will also possess a current NYFD Certificate of Fitness to use the tool. Records of this certification will be maintained on file and users should carry the original card on their person at all times.

The tool shall be tested each day before loading to see that the safety devices are in proper working condition. The method of testing shall be in accordance with the manufacturer's recommended procedure.

Any tool found not in proper working order, or that develops a defect during use, shall be immediately removed from service and not used until properly repaired.

Tools shall not be loaded nor are empty tools to be pointed at any employees.

Hand shall be kept clear of the open barrel end.

Loaded tools shall not be left unattended.



Powder-actuated Tools

Fasteners shall not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface-hardened steel, glass block, live rock, face brick, or hollow tile.

Driving into materials easily penetrated shall be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.

No fastener shall be driven into a spalled area caused by an unsatisfactory fastening.

Tools shall not be used in an explosive or flammable atmosphere.

All tools shall be used with the correct shield, guard, or attachment recommended by the manufacturer.

Live loads/cartridges must be stored in an approved, locked storage cabinet to meet applicable OSHA regulations and, for projects within the five boroughs of New York City, the NYFD Fire Prevention Unit requirements. Do not throw explosive charges into trash containers or leave them lying around. Return them to your supervisor.

Use the lowest velocity on the tool until penetration is found.

Personal protective equipment, including eye, ear, head, and hand protection is to be worn by all tool operators.



Air Powered Tools



Air hoses will be inspected prior to use looking for bends, kinks, or swelled areas.

Hoses that are not in good condition shall be removed from service. DUCT TAPE IS NOT TO BE USED FOR REPAIRS.

Hoses used under compressed air conditions must be reinforced or braided type.

Hoses used for water service may be standard air line hose.

Hoses will not be placed in access ways or across ladder passage.

Whip-checks will be used on all air lines and tools to prevent against the hazards when uncoupling occurs. Whip-checks shall be positioned on the hose rather than the fitting - if the hose should break, the fitting may stay connected while the hose will whip around.

Air powered tools and compressed air create certain health hazards where fine particles of dust, or chemicals are blown into the air. This air contamination should be eliminated by wetting agents, or exhaust ventilation.

Loose clothing, which can get caught in the moving parts of equipment, should not be worn while working with rotary tools.

Tools used with air/gas power will be used in accordance with the requirements of the manufacturer. This includes specific PPE requirements.



Air Powered Tools

All air hose clamps must be crimped into place. Do not use worm gear clamps to attach couplings and fittings to air hoses.

Compressed air should not be used to clean off clothing. Air pressure against the skin can penetrate causing internal hemorrhaging and intense pain. Air that enters body openings can burst internal organs and lead to death.

When air powered tools create hazards to others, warning signs or placards shall be posted detailing the type of hazard(s) and directions for protection.

Abrasive Tools



- Hand-held Grinders
- Guards shall remain in place at all times.
- Abrasive blades shall be used only on designated materials.
- Blades shall be mounted per manufacturer's instructions only be a qualified person.
- Blades should be stored in a climate controlled area.
- Use blades only on designated tool. (i.e., do not use chop saw blades on a cut off saw.)
- Discard all abrasive blades with illegible labels.



Abrasive Tools

Hand-held Grinders

Inspect all blades prior to use.

The arbor hole should match the arbor of the tool, use only manufactured arbor adaptors.

The R.P.M. of the wheel shall equal or exceed the R.P.M. of the tool.

Blades are to be removed from the tool whenever:

- The tool is transported by vehicle
- The tool is being stored, and the condition of the blade is suspect.

Allow newly mounted wheels to run at full R.P.M. for at least 1 minute prior to use.

Using the side of the "cutting" blade as a grinder is strictly prohibited.

Do not remove the manufacturers' handle from the tool.

Grinders shall be labeled with maximum R.P.M.

Only abrasive wheels, which are compatible with the rated R.P.M., will be used.

Only approved blades authorized through our purchasing department will be used.

Abrasive blades shall be used only on designated materials.



CHOP SAWS



General Requirements

Eye and face protection must be worn when using a chop saw.

Inspect the saw and abrasive wheel prior to each use.

Do not remove the wheel guard.

Use the vise to clamp work when necessary.

Do not force the tool through the work.

Wear properly fitting clothing to avoid entanglements.

Follow all manufacturers' instructions when changing wheels.

Never start the tool with a person in-line with the wheel. This includes the operator.

The saw should return to an open position after a cut. If it does not, the spring assembly may need repair.

Be sure to follow lock-out/tag procedures when changing wheels or performing any repairs.

Make sure the tool is on a solid base and access to the tool is free of debris.





When connecting saw to power source, be sure to follow guidelines outlined in the instruction manual.

Keep the manual in a location where operators can easily obtain it.

During installation, the front end unit will be slightly higher so that the blade will return gently to the starting position when released by the operator. A return reel is an optional accessory to be sure this occurs.

Operator shall do a safety walk around the radial arm saw area prior to commencing work.

Dull, badly set, improperly filed, or improperly tensioned saw blades shall be immediately removed from service before they result in causing the material to stick, jam, or kick back when it is fed to the saw at normal speed.

Cleanliness around the woodworking machinery is to be maintained to ensure proper functioning of guards, bearings, motors, and electrical equipment, and to prevent generation of fire hazards.

Adequate lighting in the work area shall be provided.

Do not operate the saw unless it is properly grounded.

A positive means of lockout shall be provided for rendering such controls or devices inoperative while repairs or adjustments are being made to the machine.



RADIAL ARM SAW SAFETY PROCEDURES

All belts, pulleys, gears, shafts, or other moving parts shall be guarded.

Lower blade guards will be in place during <u>ALL</u> cutting operations.

Each circular hand-fed saw shall be provided with a hood-type guard that will cover the blade at all times.

Each saw shall be provided with an anti-kickback device so as to oppose the thrust or tendency of the blade to pick up the material and throw it back toward the operator.

An adjustable stop shall be provided to prevent the forward travel of the blade beyond the position necessary to complete the cut in repetitive operations. A limit chain or other equally effective device shall be provided to prevent the saw blade from sliding beyond the edge of the table or the table shall be extended to eliminate over-run.

OPERATION:

Long hair shall be confined.

Loose flowing garments, sleeve, etc. offer a decided accident hazard and shall not be worn by operators of machines.

Safety glasses or goggles are mandatory.

Keep the working area clean from trip hazards and fire possibilities.

Keep hands well away from saw blades and other cutting tools. Use a push stock or push block to hold or guide the work when working close to cutting tool.

The practice of stopping blade rotation by placing a piece of wood against the rotating blade is prohibited.

Never leave the machine with the power on.



RADIAL ARM SAW SAFETY PROCEDURES

OPERATION:

Do not rip from wrong direction – observe caution tag on guard.

Do not force the cutting system.

Do not place hands closer than inches from the saw blade during a cut.

One operator only. The person who pulls the saw should position the work.

Always return carriage to full rear after each operation.

Respiratory protection should be considered if harmful dusts, fumes, or vapors are present.

Before a worker is permitted to operate any woodworking machine, he shall receive instructions in the hazards of the machine and the safe method of its operation. General Superintendents should designate only competent and qualified personnel to use the saw.

When employees are subject to sound exceeding those limits on the chart, hearing protection is required.



Per the contract specifications we have with our owner, CM or GC, Island Acoustics, LLC will provide and maintain protection work including but not limited to guardrails, floor hole covers and perimeter protection in accordance with NYC DOB approved Safety Plans. It is the responsibility of others, (owner/ CM or GC) to provide direction and location of all protection work needed/required.

PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

Basic Work Clothing

Full-length trousers and shirts with sleeves no less than four inches long are required at all Island Acoustics, LLC projects.

Respiratory Protection

In the event respiratory protection must be worn it will be worn in accordance to the specific health related circumstances on the project and in accordance with the Island Acoustics, LLC Respiratory Protection Procedure Policy found within this manual.

Personal Fall Arrest Equipment

In the event personal fall arrest systems must be utilized it will be done in accordance to the specific safety related circumstances on the project and in accordance with the Island Acoustics, LLC Fall Protection Procedure Policy found within this manual.

Eye and Face Protection

Eye protection meeting the latest ANSI specifications shall be worn by all personnel while on projects that require full-time eye protection. Eye protection will be worn at all other times as required by OSHA 29 Part 1926.102 Subpart E.

The eye protection meeting ANSI specifications shall have full rigid side shields if involved in drilling, chipping, striking steel on steel, driving nails, power sawing, operating a powder-actuated tool or performing similar tasks. They shall also be worn whenever the employee's job assignment results in a foreseeable or potential eye hazard.

Employees requiring corrective lenses shall have glasses in which the frames and lenses meet ANSI specifications and have in their possession documentation of same. Otherwise, "safety glasses" (manufactured glasses meeting ANSI specifications) shall be worn (over their corrective lenses if needed).

Dark or tinted lenses shall not be work at night or indoors or in areas with low visibility.

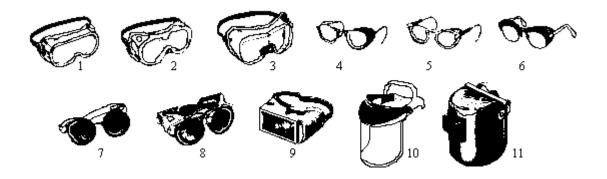
In addition to eye protection meeting the latest ANSI specifications, employees shall wear an approved face shield during activities such as grinding, use of chop/quickie saw, chemicals/corrosive liquids, chipping or chiseling.

Goggles shall also be worn where conditions result in greater potential for particles to get in worker's eyes (i.e. dust, flying chips, and debris).



Eye and Face Protection

Site management and employees will use eye and face protection based upon the requirements of OSHA 29 Part 1926.102. The information on the following pages is provided as a guide to determine correct protection.



- 1. GOGGLES, Flexible Fitting Regular Ventilation
- 2. GOGGLES, Flexible Fitting Hooded Ventilation
- 3. GOGGLES, Cushioned Fitting Rigid Body
- 4. SPECTACLES, Metal Frame, with Side shields (1)
- 5. SPECTACLES, Plastic Frame with Side shields (1)
- 6. SPECTACLES, Metal-Plastic Frame with Side shields (1)
- 7. WELDING GOGGLES, Eyecup Type Tinted Lenses (2)
- 7A. CHIPPING GOGGLES, Eyecup Type Clear Safety Lenses
- 8. WELDING GOGGLES, Cover spec Type Tinted Lenses (2)
- 8A. CHIPPING GOGGLES, Cover spec Type Clear Safety Lenses
- 9. WELDING GOGGLES, Cover spec Type Tinted Plate Lens (2)
- 10. FACE SHIELD (Available with Plastic or Mesh Window)
- 11. WELDING HELMETS (2)



OPERATION	HAZARDS	RECOMMENDED PROTECTORS
Acetylene-Burning, cutting, welding	Sparks, harmful rays, molten metal, flying particles	7, 8, 9
Chemical Handling	Splash, acid burns, fumes	2, 10
Chipping	Flying particles	1, 3,4,5,6, 7A, 8A
Electric (arc) welding	Sparks, intense rays, molten metal	9, 11 (11 in combination with 4, 5, 6 in tinted lenses
Furnace operations	Glare, heat, molten metal	7, 8, 9, 10
Grinding- Light	Flying particles	1,3,4,5,6,10
Grinding- Heavy	Flying particles	1, 3, 7A, 8A, 10
Machining	Flying particles	1,3,4,5,6,10
Molten metals	Heat, glare, sparks, splash	7, 8 (10 in combination with 4, 5, 6 in tinted lenses
Spot Welding	Flying particles, sparks	1, 3,4,5,6, 10



Head Protection

All workers shall wear hard hats meeting the specifications of the latest ANSI specifications while working in construction areas or areas of an existing site that have been designated as a "Hard Hat Area." This includes visitors, subcontractors, engineers, inspectors, and anyone else who has authorized access to our projects.

When activities result in establishing a hard hat area in an area that typically does not require hard hats, signs shall be posted by the CM/GC to inform others that hard hats are required.

Hard hats shall not be altered by drilling, cutting or other means unless approved by the manufacturer. Hard hats that have been altered by the addition of any items on the outside of the hat other than approved items shall not be permitted. When it is necessary to use additional personal protective equipment that is attached to the hard hat, only those hard hats designed for this purpose may be used.

Employees shall inspect their hard hats frequently and request replacement when damaged.

Metal hats are prohibited.

Hard hats shall be required in areas that typically would not require the use of a hard hat (offices, break areas, barracks, etc.) when the work activity creates an overhead hazard.

Foot Protection

Sturdy work shoes/boots with hard soles are required for all workers. Tennis shoes, sandals, or open toed shoes shall not be permitted.

Site management shall ensure that each affected employee uses appropriate protective footwear when working in areas where there is a danger of foot injuries due to falling/rolling objects, or objects piercing the sole, and where employee's feet are exposed to electrical hazards. Safety-toe footwear shall meet the specifications in ANSI Z41.1.

Excessively worn shoes or shoes with holes in them shall not be permitted.

Hearing Protection

Wherever it is not feasible to reduce the noise levels or duration of exposures to those specified in OSHA 1926.52, Table D-2 which list the Permissible Noise Exposures, ear protective devices shall be provided and used.

Ear protective devices inserted in the ear shall be fitted or determined individually by competent persons.



Island Acoustics, LLC Section 13: Lock Out & Tag Out Procedure Policy

Working with Energized Systems, De-Energizing, Isolation, Lock-Out and Tagging

This procedure applies to the working with and/or locking out of power sources including but not limited to electrical, steam, water, hydraulic, chemical, gravitational, pneumatic or kinetic, stored energy, etc. that can injure workers if released.

WORKING WITH ENERGIZED SYSTEMS

A. Policy

To insure that Island Acoustics, LLC is in compliance with OSHA 29 CFR 1926 and 29 CFR part 1910.147 control of hazardous energy source, **no employee will perform any work which will require the need for lockout / tagout program.** Employees will not perform any maintenance on electrical equipment, steam, hydraulic or high pressure water. All work will be contracted out to others. This section is included in the safety plan only to make employees aware of a lockout / tagout program in case they should encounter a lock or tag from another contractor.





ELECTRICAL HAZARDS

Scope and Application

Use of electricity on the jobsite poses serious hazards, with employees potentially being exposed to such dangers as electric shock, electrocution, fires and explosions.

Recognizing the importance and widespread use of the National Electrical Code (NEC) in promoting electrical safety, OSHA has incorporated those parts of the NEC that relate to employee safety on construction sites directly into its' Standards.

The OSHA regulations are divided into four parts:

- 1) Installation safety requirements (rules concerning electric equipment and installations used to provide electric power and light on jobsites).
- 2) Safety related work practices (hazards arising from use of electricity at jobsites and hazards arising from accidental contact, direct or indirect by employees, with all energized lines above or below ground passing through or near the jobsite).
- 3) Safety related maintenance and environmental considerations.
- 4) Safety requirements for special equipment.



Electric Power

Electricity flowing in well designed channels like insulated copper wires is harmless but let it flow through the human body and dire results may follow.

Low voltage (120 volts or less) does not eliminate danger of **severe** shock. The nature of contact, duration of exposure and resistance of body are all factors determining severity of shock. Muscular spasm like a hand that can't let go, often prolongs exposure. Damage to tissue depends on length of exposure to the current. If the body is well grounded like that of a person standing on damp ground or in wet concrete there is extreme vulnerability.

Higher voltages (600 volts and higher) present additional and potentially undetectable hazards that lower voltages do not. They have the ability to penetrate materials that are otherwise perceived to be insulating materials and at levels in the order of 5,000 volts and higher can actually are across open space just as lightning does.

Ground Fault Circuit Interrupters

All 120 volts single-phase 15 and 20 ampere receptacle outlets which are not a part of the permanent wiring of the structure and which are in use by employee shall have approved GFCI's.

All of Island Acoustics, LLC projects are to be 100% GFCI compliant. An assured grounding program may be used in addition to the GFCI Program.



Electric Tools

All portable electric tools such as saws, hammers and drills must bear the label of a nationally Certified Testing Agency such as Underwriters Laboratories, CSA, ETL, or the like. This helps insure that the equipment presents no hazards to the user based on its inherent design. This includes proper grounding of exposed metal parts and adequate design of insulated parts.

It is vital that dead metal parts (those not designed to carry current) be grounded. Parts are grounded only when connected to the earth by wire or cable. If, by chance, that part becomes electrified, current will flow to the ground, not through the hand that touched it.

Single phase motors should have three wire cable: two for current to motor and one (insulation GREEN) connected from motor casing in a suitable ground. Three pronged locking connectors should be used on extension cords which carry a third or ground wire. Three phases current requires fourth wire for grounding. This ground is connected to outlet of temporary wiring system which itself must be grounded to water pipe or copper rod driven into the earth.

Certain small electric tools may only provide a two pronged connector as supplied from the factory. These are categorized as "double insulated". However, double insulated tools should be identified by the manufacturers rating label attached to the tool not simply because only to prongs are present. The design of these items is such that no portion of the tool enclosure is metallic so a failure of internal insulation cannot energize the case and expose the user to danger.

Since the safety of an electric power tool is based on its design and Lab approval, these tools must be maintained in their original condition. This includes damage to the case or housings of a tool, condition of the power cord, etc. One vital item is that the third (grounding) pin on a power plug must remain in place. If a tool is damaged severely or has the grounding pin removed from its plug positive action such as physical removal of the power plug must be taken to insure that unsafe tool cannot be used.

Electric Equipment

Heavy stationary electric equipment, such as hoist motors and starters, are usually self-contained and housed in the engineer's shanty; hence hazard is confined and limited. As in case of tools, dead metal parts like housings, boxes and hoist frames must be grounded.



Extension Cords

Tough weatherproof insulation is necessary to withstand heavy abuse. Only round, heavy duty (type S, ST, SO, STD) are acceptable. Wheelbarrows and buggies, bricks and nails, sharp edges and kinks, oil and grease, all give extension cords a hard time and severely limit useful life. Cords also must be maintained in their original designed configuration. Any cord which is damaged or has a grounding pin removed should be positively removed from service by cutting off the male plug. Cord which have been spliced or repaired should be removed from project site.

Short circuits from bared or cut wires may cause shock or fire. The gauge of wire of the cord should be sized for the designated use, but in no case less than 16 gauges. For an overall length over 100 feet one size larger should be used. All extension cord must be plugged into permanent power sources or jobsite temporary power that has proper over current and ground fault protection.

Whenever an extension cord is plugged into an existing building outlet for construction work, a GCFI is required between the extension cord and the tool.

All extension cords and temporary wiring shall be maintained at least 6'6" above the ground or floor. Where this is impossible these items must be protected from damage. Inspect often where damage occurs, repair or dispose.

Temporary Wiring

Temporary wiring installation and maintenance will be performed by others on the job site(s).

Temporary Lighting

Temporary lighting, when required including halogen stand lights will be provided by others.

Lock Out- Tag Out Policy

Island Acoustics, LLC will adhere to the Lock Out -Tag Out Policies established on our client's projects. This includes compliance with the electrical subcontractor's program. In the event that a machinery lock out tag out program is required we will provide a site specific plan in accordance with OSHA CFR 1910.147.



Island Acoustics, LLC
Section 15: Fire Protection and Prevention Policy



FIRE HAZARDS AND PREVENTION

The control of fire hazards and the reduction of losses from fire depend upon four fundamental principles.

- 1. Fire prevention engineering / jobsite preplanning.
- 2. Early detection and extinguishment.
- 3. Damage control.
- 4. Prevention of personal injuries from fire or panic.

Fundamentals of Fire Safety:

Preplanning the site is crucial to the protection of lives and property. The basic sequence of actions that must be taken in case of fire is the basis for establishment of the site fire plan. Understanding the actions and why the sequence is important will aid in the plan's development. The actions are in order:

- 1. Evacuate
- 2. Notify the Fire Department
- 3. Fight the fire

The priority of this sequence should not be broken; however, this does not mean that more than one item cannot occur at a time.



Evacuation

Each project foreman or superintendent for Island Acoustics, LLC must immediately familiarize himself/herself with the Fire/Emergency Evacuation Plan provided by the general contractor or construction manager. The foreman/superintendent will work closely and cooperate with our client's plan and will provide each of our own employees and subcontractors with all pertinent information in regards to the plan. This should be conveyed at new hire orientations.

The fire protection program established by the CM/GC should provide for the ability of all workers to exit in case of an emergency. Key considerations include:

- ✓ Stairways and ladders used for egress must be kept free of combustible and flammable materials.
- ✓ Stairways and ladders shall not be used for storage of materials.
- ✓ Temporary lighting must be installed and maintained in working condition.
- ✓ Post and maintain Exit signs.

Once exits are provided, making sure everyone knows where they are is the next task. The use of preprinted cardboard or plastic exit signs in fluorescent colors is encouraged rather than marking the wall with the word "exit" in spray paint. This tends to lend more credence to the fact that it really is an exit. Additionally, where a preemployment safety training session is conducted, a sheet with exit locations and pathways can be distributed. Finally, after providing and marking the exits, diligence must be used to insure they remain clear and unobstructed. This task should be done everyday by all staff in the building.

Some provision should be made on every site to notify personnel to evacuate the building, whether because of fire or other emergency. The nature of the project will dictate this method, which can range from a temporary alarm system to a hand held marine emergency signal. Whatever the method, all on site should know what the warning is and how to activate it.

Upon evacuation, workers will meet at a designated area designated by the CM/GC so that all people can be accounted for by their respective supervisors. Do not re-enter the building until the fire department has unannounced the building can be safely re-entered.



Notify the Fire Department

Regardless of the size of the fire or your estimation of your capabilities to extinguish it, the next action that must occur is the notification of the fire department. The first three minutes of a fire are the most crucial, and most fires start out small enough that they could be easily extinguished. However, most large loss fires are also due to a delay in notification of the fire department. Your concerns that the department will think you are foolish for calling them for small rubbish fires are wrong. They would rather respond to six small size fires that they arrive after the fire is extinguished, they can be sure it will not restart.

Provision must be made for notification of the fire department from within the building. The era of advancing technology has brought us the cellular or PCS phone system, but some projects may be located in an area without coverage. The use of radios in communication with the project office with regular phone service could be the answer. Again, the specific nature and location of the project will dictate its needs, and the site may require creative solutions.

Fight the Fire

Once evacuation is underway and you are sure the fire department has been notified, if and only if you have an unobstructed escape path to an exit, you may consider fighting the fire. This phase is purely for property protection. While it is important to contain or extinguish the fire, the loss of property does not warrant the risk of life or limb by our employees or subcontractors.

Extinguishing of the fire requires the proper provision, distribution and maintenance of an extinguishing "system". This can range from normal fire extinguishers to a standpipe system with fire pump.

The Underwriters Laboratory classifies fires by three general types of extinguishing agents.

Class A Fires – Fires in ordinary materials such as wood, paper, excelsior, rags and rubbish. The quenching and cooling effects of water or solutions containing large percentages of water are of first importance in these fires.

Class B Fires – Fires in such flammable liquids as gasoline, old and grease require smothering action. Solid streams of water are likely to spread the fire (under certain circumstances water fog nozzles may prove effective).

Class C Fires – Fire in or near electrical equipment must be smothered by using a non-conducting agent such as carbon dioxide or dry chemical compounds.



Fire extinguishment is usually accomplished by three methods:

- 1. <u>Eliminate oxygen from the air</u>. Replace air with an inert gas. Apply a non-combustible cover or a chemical which will dilute the oxygen below point of combustion.
- 2. <u>Remove or shut off the fuel supply</u>. Divert or shut off valves in liquid or gas fuel supply lines and remove the burning fuel.
- 3. Reduce the temperature below the ignition point. Cool the burning material with water or chemicals.

While the use of one or more than one method generally produces better results, it is important that the most effective method be employed first.

Although there are many types of extinguishers, only one type of fire extinguisher is approved for use on all Island Acoustics, LLC work sites: a class "ABC" multipurpose-purpose dry chemical extinguisher for use on wood, paper, textiles, electrical and flammable liquids.

The use of carbon tetrachloride extinguishers is prohibited.

Manufacturer's instructions should be followed for each type of extinguisher. Complicated types of extinguishers should be avoided. Employees should be taught how to operate each type provided so that prompt action when a fire starts can be assured. Care should be used in selecting extinguishers for each job.

The purpose of extinguishers should be discussed with job management and Owner's representative before final selection is made.

Extinguishers supplied by the CM/GC should be stand or wall mounted, visible and easily accessible at all times. They must be distributed so that the distance to an extinguisher from any point on a floor is not more than 75 feet.

Suggested Training:

- ♣ Orientation to site fire protection program including evacuation plan and emergency communications.
- Fire fighting equipment availability on site.
- ♣ Monthly inspection procedures.
- Proper maintenance procedures.



Fire Prevention- Hot Works and Permit

Regardless of the location of our work operations and as required by the owner, CM or GC Island Acoustics, LLC field supervision will document all hot work operations by completing Hot Work Permits.

At least one designated fire guard/ watch will be provided at each and every one of our hot work operations. This includes grinding and cutting operations. The fire guard will be trained in their duties and responsibilities and proper use of a fire extinguisher. He/she will be provided with one for his/her duties. Once again, we will provide and use ABC type extinguishers for such purpose if one is not provided by CM/GC.

Island Acoustics, LLC field supervision will ensure the following items are complied with when performing any/all work within the five boroughs of New York City:

- Compliance with the latest requirements of NYC Building Code Chapter 33
- Compliance with the latest requirements of NYC Fire Code
- Compliance with the latest requirements of NYC Fire Prevention Unit
- Compliance with the latest requirements of the NYFD Construction/ Demolition and Abatement Unit, (CDA)

Specific Compliance Requirements for work within the five boroughs of NYC:

Powder Actuated Tools:

The storage and use of powder actuated tools including ammunition will be in compliance with the NYC Fire Code section 2.1.5 and 105.6 which requires permits and approved storage for ammunition of 200 shells or more.

Aerosol Cans:

The storage of aerosols such as spray paint for layout work and WD40 will also be in compliance with the NYC Fire Code including section 1418.1.



Shanties:

Job site shanties will be constructed, equipped and maintained in accordance with the latest requirements of the NYC Building Code Chapter 33, NYC Fire Code, and NYC Fire Prevention Unit. See following page for additional shanty construction requirements.

Fires originating in shanties installed within and adjacent to buildings have resulted in severe and costly damage.

In order to reduce the fire hazards on the jobs:

- ✓ All shanties and temporary partitions installed by Island Acoustics, LLC and/or Subcontractors within buildings and 10 feet or less from buildings shall be constructed entirely of fire-retardant material, such as treated lumber, steel, masonry or other approved incombustible materials.
- ✓ Fire-retardant treated lumber shall be pressure treated with fire-retardant chemicals in accordance with the current American Wood Preserves Association Standards C1, C20 and C27 and shall have a flame spread rating no greater than 25' when tested in accordance with A.S.T.M. Standard E84 with no evidence of the significant progressive combustion when exposed for at least 30 minutes. All fire-retardant treated wood shall bear the identification of a testing laboratory or a certification of performance by the producer.





BASIS: Approximately 300,000 disabling injuries occur in work-related falls each year. 85 percent of workers surviving falls lose time from their jobs. This poses a serious problem for exposed workers and their employer. The OSHA Safety Standards establish uniform requirements to make sure that the hazards elevated falls in U.S. workplaces are evaluated, and that this hazard information is transmitted to all affected workers.

GENERAL: Island Acoustics, LLC shall ensure that the hazards of all elevated falls at our sites are evaluated, and that information concerning their hazards is transmitted to all employees. This standard practice instruction is intended to address comprehensively the issues of; evaluating potential fall hazards, communicating information concerning these hazards, and establishing appropriate protective measures for employees.



Written Program

This standard practice instruction shall be maintained in accordance with 29 CFR and updated as required. Where no update is required this document shall be reviewed annually. Effective implementation of this program requires support from all levels of management within this company. This written program shall be communicated to all personnel that are affected by it. It encompasses the total workplace, regardless of number of workers employed or the number of work shifts. It is designed to establish clear goals, and objectives. Island Acoustics, LLC shall:

- Annually review and revise this written program based on company operational requirements or, as required by OSHA Safety Standards.
- Review the program any time fall protection procedures fail.

Statement of Policy

This instruction describes a systematic approach that must be used to protect people from falls and how to eliminate fall hazards, prevent falls, and eliminate or reduce injury if a fall does occur. No unprotected work over 6 feet is permitted. This instruction also lists some of the most common fall hazards, and provides recommendations and guidelines for selecting fall-arrest systems.

Jobsite/Activity Evaluation

The workplace shall be assessed before each assigned job for potential fall hazards. Proper fall arrest equipment shall be used for jobs requiring fall protection when elimination of the hazard(s) is not possible. This company shall evaluate our jobsites to determine known fall hazards. This preliminary evaluation shall detail the required steps for protecting employees from fall hazards. An Activity/Fall prevention plan shall be used to document fall hazard assessments. A complete listing of fall hazard locations and protective measures procedures shall be maintained.



Training

A training program shall be provided for all employees who shall be exposed to fall hazards in the work area. The program must include but is not limited to a description of fall hazards in the work area, procedures for using fall prevention and protection systems, equipment limitations, the elements encompassed in total fall distance, and inspection and storage procedures for the equipment. Generally, workers shall be trained to recognize the hazards of falling from heights and to avoid falls to lower levels through holes or openings in walking/working surfaces and walls. Training programs shall include prevention, control and fall-arrest systems. It must be ensured that appropriate fall-arrest systems are installed and that employees know how to use them before beginning any work that requires fall control.

Initial Training

Training shall be conducted prior to job assignment. Island Acoustics, LLC shall provide training to ensure that the purpose, function, and proper use of Fall Protections is understood by employees and that the knowledge and skills required for the safe application and usage is acquired by employees. This policy instruction shall be provided to, and read by all employees receiving training. The training shall include, as a minimum the following:

- ✓ Types of fall protections equipment appropriate for use.
- ✓ Recognition of applicable fall hazards associated with the work to be completed.
- ✓ Load determination and balancing requirements.
- ✓ Procedures for removal of a fall protection devices from service.
- ✓ All other employees, whose work operations are or may be in an area where fall protection devices may be utilized, shall be instructed to an awareness level concerning hazards associated with fall protection operations.
- ✓ Fall protection equipment identification. Fall protection equipment having identification numbers shall be checked for legibility.
- ✓ Please note our Fall Protection training OSHA 1926.503 training program (on site) and Certificates issued to each employee as an addendum to this section.



Certification

Island Acoustics, LLC will certify that employee training has been accomplished and is being kept up to date.

The certification shall contain each employee's name and dates of training.

Fall Protection trainers shall include the Safety Director, Superintendents, and Foremen.

Refresher training

This standard practice instruction shall be provided to, and read by all employees receiving refresher training. The training content shall be identical to initial training. Refresher training shall be conducted on an ongoing basis or when the following conditions are met, which ever event occurs sooner:

- ✓ Retraining shall be provided for all authorized and affected employees whenever (and prior to) there being a change in their job assignments, a change in the type of fall protection equipment used, or when a known hazard is added to the work environment which affects the fall protection program.
- ✓ Additional retraining shall also be conducted whenever a periodic inspection reveals, or whenever this employer has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of fall protection equipment or procedures.
- ✓ Whenever a fall protection procedure fails.
- ✓ The retraining shall reestablish employee proficiency and introduce new or revised methods and procedures, as necessary.

Certification

Island Acoustics, LLC will certify that employee training has been accomplished and is being kept up to date.



Control Procedures Development

Once a jobsite evaluation has been accomplished, procedures shall be developed, documented and utilized for the control of potential fall hazards. We adhere to the jobsite specific and CM/GC contractual requirements. Fall prevention plans shall be designed by company qualified individuals, usually engineers and Safety supervisors. Company engineers and safety supervisors shall be provided with any required special training to recognize fall hazards, to understand fall prevention techniques, and to become familiar with fall-arrest equipment and procedures. It is critical that they consider fall protection design for the safety of operations where workers must work at elevated heights. Safety during access and egress from elevated work sites shall also be considered. The following guidelines shall be used when planning work at heights:

- Involve office management early in the project planning/job planning so that they can recommend appropriate fall-protection measures and equipment.
- > Involve Engineering and/or Safety when load rating of anchorage points must be determined or is in doubt.
- Involve Engineering and/or Safety when anchorage points must be installed.
- ➤ Be specific in dealing with fall hazards when developing contracts. Require subcontractors to provide a written fall protection program which describes subcontractor fall protection policies and procedures when they shall be working at heights.



Procedural Format

The following format shall be followed when developing fall control procedures. The Project Superintendent or Foreman shall be responsible for the implementation of these procedures. The procedures shall clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized to control fall hazards, and the means to enforce compliance including, but not limited to, the following:

- A specific statement of the intended use of the procedure.
- A review of accident records, including OSHA 300 logs and Workers' Compensation documentation.
- > Interviews with employees and groups of employees whose work environment includes or may include these fall hazards.
- Physical observations of the work environment(s) that involve fall hazards or the potential of such.
- > Observations of individuals and their job tasks and work habits that expose them to existing or potential fall hazards.
- > The identification of all hazards in the work area.
- The procedures contained in the company fall-protection program.
- > Specific procedural steps for the use and operation of guardrail systems, body harness systems, and other fall protection systems.
- > Specific requirements for testing fall protection systems or equipment to determine and verify the effectiveness of the fall protection control measures.
- The role of each employee in fall protection plans and applicable policies.
- > Specific requirements for inspecting fall protection systems or equipment.



Protective Materials and Hardware

Appropriate fall protection devices shall be provided for the control of potential fall hazards. Selection of the equipment shall be based on the fall protection evaluation.

Selection Criteria

Fall Protection devices shall be singularly identified; shall be the only devices(s) used for controlling falls; shall not be used for other purposes; and shall meet the following requirements:

- Capable of withstanding the environment to which they are exposed for the maximum period of time that exposure is expected.
- Constructed so that exposure to weather conditions or wet and damp locations shall not cause deterioration or lessen the protection provided.
- Anchor points shall not deteriorate when located in corrosive environments such as areas where acid and alkali chemicals are handled and stored.
- Capable of withstanding the anticipated weights to which they are exposed for the maximum period of time that exposure is expected.
- > Standardization within the jobsite. Fall protection devices shall be standardized within the site whenever possible.

Fall Protection Systems

When fall hazards cannot be eliminated through any other means, fall-arrest systems shall be used to control falls. Proper training on use of fall-arrest equipment is essential and shall be provided prior to use.



Full-Body Harness Systems

A full body harness system consists of a full-body harness, lanyard, energy shock absorber, and self-locking snap hook. Before using a full-body harness system, the supervisor and/or the user must address such issues as:

- ✓ Has the user been trained to recognize fall hazards and to use fall-arrest systems properly?
- ✓ Are all components of the system compatible according to the manufacturer's instructions?
- ✓ Have all components of the system been inspected within the last six months?
- ✓ Have appropriate anchorage points and attachment techniques been reviewed?
- ✓ Has free-fall distance been considered so that a worker shall not strike a lower surface or object before the fall is arrested?
- ✓ Have pendulum swing fall hazards been eliminated?
- ✓ Have the full-body harness and all of its components been inspected both before each use and on a regular semi-annual basis?
- ✓ Is any of the equipment, including lanyards, connectors, and lifelines, subject to such problems as welding damage, chemical corrosion, or sandblasts?

Retractable Lifelines

A retractable lifeline is a fall-arrest device used in conjunction with other components of a fall-arrest system. Retractable lifelines should be used by only one person at a time.

A properly inspected and maintained retractable lifeline, when correctly installed and used within the fall-arrest system, automatically stops a person's descent in a short distance after the onset of an accidental fall.

Retractable lifelines shall be considered when working in areas such as on roofs and scaffolds, or in tanks, towers, vessels, and manholes. Also, retractable lifelines should be considered when climbing such equipment as vertical fixed ladders and telescoping derricks.



Before using a retractable lifeline, the supervisor and/or the user must address the following questions:

- ✓ Has the user been trained to use a retractable lifeline correctly?
- ✓ Is the retractable lifeline being used in conjunction with a complete fall arrest system?
- ✓ Is the equipment under a regular inspection program?
- ✓ Has the equipment been inspected within the last six months?

Standard Harnesses

Harnesses for general purpose work should be Class III, constructed with a back D-ring, and integral hip D-rings for work positioning capability. Standard harnesses are suitable for continuous fall protection while climbing, riding, or working on elevated platforms. They are suitable for positioning and fall arrest for people who are working at heights.

Inspection and Maintenance

To ensure that fall protection systems are ready and able to perform their required tasks, a program of inspection and maintenance shall be implemented and maintained. See OSHA 1926.503.

The following as a minimum, shall comprise the basic requirements of the inspection and maintenance program:

- > Equipment manufacturer's instructions shall be incorporated into inspection and preventive maintenance procedures.
- ➤ All fall protection equipment shall be inspected at intervals not to exceed 6 months or in accordance with the manufacturer's guidelines.
- The user shall inspect his/her equipment prior to each use and check the inspection date.
- Any fall protection equipment subjected to a fall shall be removed from service immediately.
- ➤ Check all equipment for mold, damage, wear, mildew, or distortion.
- Hardware should be free of cracks, sharp edges, or burns.
- Ensure no straps are cut, broken, torn or scraped.
- > Special situations such as radiation, electrical conductivity, and chemical effects shall be considered.



- > Equipment that is damaged or in need of maintenance shall be tagged as unusable, and *shall not be stored* in the same area as serviceable equipment.
- > A detailed inspection policy shall be used for equipment stored for long periods of time.
- ➤ All fall equipment shall be inspected before each use by the user and supervisor.
- Anchors and mountings shall be inspected before each use by the user and supervisor.

Most Common and Most Dangerous Fall Hazards

The tasks and situations listed below present inherent fall hazards. Give special attention to providing fall prevention and/or fall control for them, remembering that this attention is necessary in the design, engineering, planning, and execution stages of work. Give special consideration to fall protection for the following tasks:

- ♣ Work that involves fall hazards, such as on concrete decks, etc.
- **♦** Working on roofs, with deteriorating or unsupported sections and framing.
- ♣ Working over plating systems, acid tanks or open pits.
- Working from a fixed or portable ladder or climbing system.
- Performing work on water towers, bridges silos, pipe racks, presses, and floor pits.



Definitions

Anchorage means a secure point of attachment for lifelines, lanyards or deceleration devices.

<u>Body belt</u> means a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

<u>Body harness</u> means straps which may be secured about the employee in a manner that shall distribute the fall arrest forces over at least the thighs, pelvis, waist, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

<u>Competent person</u> means a person who is capable of identifying hazardous or dangerous conditions in any personal fall arrest system or any component thereof, as shall as in their application and use with related equipment.

<u>Connector</u> 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.

<u>Deceleration device</u> means any mechanism, such as a rope grab, rip stitch lanyard, tearing or deforming lanyards, self-retracting lifelines, 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.

Energy shock absorber means a device that limits shock-load forces on the body.

<u>Failure</u> means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

<u>Fall arrest system</u> means a system specifically designed to secure, suspend, or assist in retrieving a worker in or from a hazardous work area. The basic components of a fall arrest system include anchorage, anchorage connector, lanyard, shock absorber, harness, and self-locking snap hook.

<u>Free fall</u> means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

<u>Free fall distance</u> means the vertical displacement of the fall arrest attachment point on the employee's body belt or 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 or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.



Definitions

Hole means a gap or void 2 inches or more in its least dimension, in a floor, roof, or other walking/working surface.

<u>Lanyard</u> means a flexible line of rope, wire rope, or strap which generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline or anchorage.

<u>Leading edge</u> means the edge of a floor roof, or formwork for a floor or other walking/working surface 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.

<u>Lifeline</u> means a component consisting of a flexible line for connection to an anchorage at one end to hang vertically or for connection to anchorages at both ends to stretch horizontally and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

<u>Opening</u> 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.

<u>Personal fall arrest system</u> means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these. As of January 1, 1998, the use of a body belt for fall arrest is prohibited.

<u>Positioning device system</u> 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.

<u>Qualified person</u> means one with a recognized degree or professional certificate and extensive knowledge and experience in the subject field who is capable of design, analysis, evaluation and specifications in the subject work, project, or product.

<u>Retractable lifeline</u> means a fall arrest device that allows free travel without slack rope, but locks instantly when a fall begins.

<u>Rope grab</u> 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.

<u>Safety-monitoring system</u> means a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.



Definitions

<u>Self-retracting lifeline/lanyard</u> 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.

<u>Snaphook</u> means a connector comprised of a hook-shaped member with a normally closed keeper, or 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:

- 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
- The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. As of January 1, 1998, the use of a non-locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

<u>Toeboard</u> means a low protective barrier that shall prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

<u>Walking/Working surface</u> means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

<u>Warning line system</u> 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 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.



OSHA 1926.503 Fall Protection Training

Date of Training: SAMPLE

Conducted By: Michael Cuttita/On Site Foreman

I have attended the OSHA 1926.503 Fall Protection Training and I agree to perform the task(s) as discussed.

Name:	<u>Signature:</u>	<u>Date:</u>











General Safety Requirements

- Ladders used with scaffolds are governed by the OSHA scaffold standard and the procedure policy for scaffolds found within this Island Acoustics, LLC. corporate safety manual.
- > Stairway or ladder will be provided whenever there is a break in elevation of 19" or more.
- > Double ladders will be used if required.
- Landings will be clear and free of debris.



Stairway Safety Requirements

- Project supervision will ensure that at least twenty inches of clearance exists on any platform when a stairway leads up to a doorway such as temporary field offices.
- As required by contract with our CM/GC, metal pan stairs will be poured immediately, temporarily filled or effectively closed off until the stair can be poured or otherwise filled.
- > Stairs with four or more risers will have at least one handrail.
- Screens, netting or mesh will be provided when tools, material, equipment, etc. can fall from the stairway and/or platforms.
- ➤ Handrails and guardrails will be able to support 200 pounds.
- The height of a handrail will be installed between 37" to 30" from top of tread, unless the handrail is also acting in the capacity of a guardrail, then 37"-36" from the top of the tread.
- Rails will not be able to cause cuts, punctures or snagging of employees.
- Rails will not project beyond the top step so as not to cause projection hazard.
- A minimum of 3" clearance will be maintained between a handrail and the adjacent wall.
- > Our clients, (General Contractors/ Construction Managers) are responsible for providing safe stairway access.



Ladder Safety Requirements

- All ladders to be put into service will be checked beforehand to ensure that the selected ladder will be able to withstand the intended loads.
- Ladder surfaces will not cause cut, puncture or snagging hazards.
- Fixed ladders will have fall protection if the length of travel is greater than 24 feet.
- Portable ladders will extend at least three feet from landing level or a solid grasping device will be provided.
- All ladders will be maintained free from grease, oil or any other slipping hazards.
- The user of the ladder will ensure he/she is provided with a stable and level surface.
- **>** Barricades will be provided if a ladder is located in a busy area or where it may be displaced.
- Ladders will not be moved, shifted or extended while in use.
- Ladders will be non-conductive type if located near any source of electrical energy.
- The top step is not to be used as a step.
- A Competent person for Island Acoustics, LLC will inspect ladders on a periodic basis or after any occurrence that could have affected safe use.
- Defective ladders will be taken out of use and replaced immediately.
- The user must face the ladder.
- At least one hand will be in contact with the ladder at all times (three point contact).
- No load or object will be transported by the employee using a ladder.
- Depending on contract requirements with our clients, (General Contractors/ Construction Managers) Island Acoustics, LLC may have to provide a ladder use permit if/when other means of safe work elevations cannot be performed.

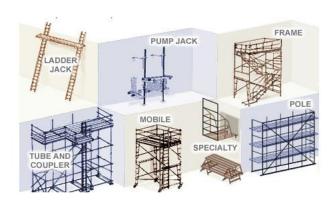


Training Requirements

Each Island Acoustics, LLC project site team will designate at least one competent person to train the employees in the nature of hazards associated with stairs and ladders and:

- ✓ The OSHA Subpart X Standard
- ✓ Safe and unsafe practices
- ✓ Proper construction, use, handling and placement
- ✓ Maximum intended loads
- ✓ Fall Protection Systems
- ✓ Retraining will be provided as necessary







The Scaffold regulations are found at 29 CFR 1926.450-.454 and should be followed by all Island Acoustics, LLC personnel. This section of the OSHA Standards is also commonly referred to as Subpart L. The requirements for Scaffolds within Subpart L are divided into five sections:

- > Scope and application This rule applies to all scaffolds used in construction, alteration, repair (including painting and decorating), and demolition.
- ➤ **General requirements** Requirements for capacity, construction, access, use, fall protection, and falling object protection when working on scaffolds.
- ➤ **Additional requirements** Pinpoints specific types of scaffolds in use and applies additional requirements for working safely with them.
- ➤ **Aerial lifts** Includes safety requirements for extensible boom platforms, aerial ladders, articulating boom platforms, vertical towers, and a combination of any such devices.
- ➤ **Training** Provides specific training requirements for: employees who work on scaffolds and employees who assemble, disassemble, move, operate, repair, maintain, or inspect scaffolds. Retraining is covered.

Remember to follow the OSHA Standard as well as the policy statements within this section. In addition, all employees engaged in contract work within the five boroughs of New York will comply with Chapter 33 of the New York City Building Code and all local laws pertaining to scaffold safety and training requirements. This includes but is not limited to 32 Hour Scaffold Erector Course Completion for all supported scaffolds over 40 feet in height and 4 Hour Scaffold User Course Completion for all supported scaffolds.



A scaffold is defined as any temporary elevated platform constructed of wood, metal, or a combination and its supporting structure used in construction or maintenance as an employee work platform and/or staging area for materials.

GENERAL REQUIREMENTS

- Designed to support at least 4 times the anticipated weight of workers and materials.
- Suspension scaffolds designed for a working load of 500 pounds should utilize no more than 2 workers at a time. Suspension scaffolds designed for a working load of 700 pounds should have no more than 3 workers at a time.
- Safe and convenient means of access to the working platform level must be provided. This may be a portable or fixed ladder, a ramp or runway, or a stairway.
- Footings or anchorage must be level, sound, rigid, and capable of carrying the maximum intended load without settling or displacement.
- Brace poles, legs or uprights prevent swaying and displacement.
- Unstable objects such as barrels, boxes, loose bricks, or concrete blocks are not to be used to support scaffolds or planks.
- No scaffold shall be erected, moved, dismantled, or altered except under the supervision of competent personnel.
- The use of shore or lean-to scaffold is prohibited.
- When work is being done below a scaffold, overhead protection must be provided no more than 9 feet above the working platform. It must be made of planking or other strong material.
- Any scaffold or component of a scaffold that is weakened or damaged must be replaced or repaired immediately.
- Slippery conditions on scaffolds must be eliminated as soon as they occur.
- All load carrying timber member of scaffolds shall be a minimum of 1500 fiber (stress-grade) construction grade lumber.
- Wire, synthetic, or fiber rope should be capable of supporting at least 6 times the rated load and should be inspected before each use



Working Platform Construction When Erecting Scaffolds

Platforms, on all working levels, will be fully decked between the front uprights and the guardrail supports.

The space between planks, and the platform and uprights, will not be more than one inch wide. Exceptions are made when Island Acoustics shows that a wider space is necessary.

Platforms and walkways will be at least 18 inches wide except that ladder jack, top plate bracket, and pump jack scaffolds will be at least 12 inches wide.

If work areas are so narrow that and walkways can't be 18 inches wide, they must be as wide as possible and employees will be protected from falls by guardrails and/or personal fall arrest systems.

The front edge of platforms will not be more than 14 inches from the face of our work unless guardrails are erected along the front edge and/or a personal fall arrest system is being used.

The maximum distance from the face for plastering and lathing work is 18 inches.

The ends of our platform, unless cleated or somehow restrained, will extend over the center line of its support at least six inches, except each end of a platform:

- (1) 10 feet or less in length will not extend over its support more than 12 inches,
- (2) or for greater than 10 feet in length, will not extend over its support more than 18 inches, unless it:

Is designed to support workers and/or materials without tipping; or has a guardrail to block employee access to the platform end.

Supported Scaffolds

For every four feet a scaffold is high, it will be at least one foot wide. If it is not, it will be protected from tipping by tying, bracing, or guying per the OSHA standards.

Supported scaffolds will sit on base plates and mud sills or other steady foundations.

Objects, such as blocks of wood or buckets, will not be used to support scaffolds or be used as working platforms.

Supported scaffold poles, legs, posts, frames, and uprights will be plumb and braced to prevent swaying and movement.



Supported Scaffolds

Standard guardrail systems must always be in place for any work taking place on scaffolds six feet or greater in height. In the event scaffold manufacturer's requirements are more stringent we will follow same.

Cross-bracing will not be used to access supported scaffolds at any time.

Suspension Scaffolds

Note: Island Acoustics, LLC does not predict work from suspended scaffolds will be necessary on our projects. In the event work from suspension scaffolds is necessary, our employees will adhere to the latest OSHA Standard requirements as well as NYC Department of Building requirements, (training) for all our projects located within the five boroughs of New York.

The inboard ends of suspension scaffold outriggers will be stabilized by bolts or other direct connections to the floor or roof deck or stabilized by counterweights.

Island Acoustics, LLC competent person will check the connections before we use a suspension scaffold.

Counterweights will be secured by mechanical means to the outrigger beams. They will not be made of flowable material such as sand or gravel, or construction materials such as masonry units.

Suspension ropes will be inspected by Island Acoustics, LLC competent person prior to each work shift and after every occurrence which could affect a rope's integrity.

Employees are to report any of the following "rope" problems to their Supervisor:

- ✓ Any physical damage which doesn't allow the rope to do what it is supposed to do or makes it weaker.
- ✓ Kinks that might cause a problem during tracking or wrapping around the drum.
- ✓ Broken wire stands.
- ✓ Abrasions, corrosion, scrubbing, flattening or peening causing loss of more than one-third of the original diameter of the outside wires.
- ✓ Evidence that the secondary brake was activated during an over speed condition and has engaged the suspension rope.



Suspension Scaffolds

Gasoline-powered equipment and hoists will not be used on suspension scaffolds.

Gears and brakes of power-operated hoists used on suspension scaffolds will be enclosed to prevent them from swaying when necessary as determined by Island Acoustics, LLC competent person.

Access to and between scaffold platforms more than two feet above or below the point of access will be made by:

Portable ladders, hook-on ladders, attachable ladders, scaffold stairways, stairway-type ladders (such as ladder stands), ramps, walkways, integral prefabricated scaffold access, or equivalent means; or by direct access from another scaffold, structure, personnel hoist, or similar surface.

Fall Protection

All personal fall arrest systems used on scaffolds must meet the requirements of 1926.502(d) and must be attached by lanyard to a vertical or horizontal lifeline or scaffold structural member.

When used, vertical and horizontal lifelines and lanyards must meet the requirements of 1926.452(g) (3).

When selected for fall protection, guardrail systems must:

- ✓ Be installed along all open sides and ends of platforms.
- ✓ Be installed before use of the scaffold.
- ✓ Meet the physical requirements of 1926.451(g) (4).
- ✓ Guardrail top-rails must be between 38 and 45 inches high.
- ✓ Screens and mesh, when used, will extend from the top edge of the guardrail system to the platform, along the entire opening between the supports.
- ✓ Steel or plastic banding cannot be used as a top-rail or mid-rail.
- Cross-bracing is acceptable in place of a rail, but it must meet the requirements of 1926.452(g) (4) (xv). This is not the policy for any project within the five boroughs of New York City. Standard rails must be installed as well as the cross-bracing.



Falling Object Protection

While working on scaffolding, the employee will be provided with not only hard hats, but additional protection from falling hand tools, debris, and other objects above them. This is usually done by installing equipment that contains or deflects the objects such as:

- ➤ Toe boards, screens, or guardrail systems or;
- > Tether tools per the CM/GC safety plan or;
- > Debris nets catch platforms, or canopy structures.

When the objects are too large or heavy for the above listed measures to work, workers above will secure the objects away from the edge of the surface from which they could fall.

Where there is a danger of tools, materials, or equipment falling from a scaffold and striking fellow employees below you, your employer must use barricades or toe-boards to protect them.

Where tools, materials, or equipment are piled higher than the top of the toe-board, paneling, screening, a guardrail system with openings small enough to prevent passage of objects, or canopy structures, debris, nets, or catch platforms will be erected.

Competent Person

Scaffolds will be erected, moved, dismantled, or altered only under the supervision and direction of a qualified competent person. Such activities shall be performed only by experienced and trained employees selected for such work by the competent person.

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 the authorization to take corrective measures to eliminate them.

All scaffolds will be inspected by a Competent Person prior to and during their erection. Daily inspections will be made by the Competent Person, prior to any employee accessing the scaffold to perform work. Special inspections will be made by the Competent Person, when circumstances warrant such as:

- ✓ High Winds
- ✓ Freeze/Thaw Conditions
- ✓ Heavy Rains
- ✓ Snow/Sleet
- ✓ Structure Modifications

Our subcontractors will identify their scaffold competent person prior to erecting any scaffold.



Load Capacity

All scaffolds must be capable of supporting at least four times the maximum intended load. The maximum intended load is the total load of all persons, equipment, tools, materials, transmitted loads, and other loads reasonably anticipated to be applied to a scaffold or scaffold component at anyone time.

Lumber Standards

All wooden load carrying components of scaffold framing must be a minimum of 1,500 fiber construction grade lumber. All dimensions are nominal sizes as provided in the American Lumber Standards. When rough sizes are noted, only rough or undressed lumber of the size specified will satisfy minimum requirements.

Planking

All planking must be 2 x 10 inch scaffold grade or equivalent, as recognized by approved grading rules for the specific of wood used. Laminated planking that provides the equivalent strength of scaffold grade planking is also suitable.

Training Requirements

All employees who perform work on a scaffold will be trained by a person qualified (Competent Person) in the subject matter to recognize the hazards associated with the type of scaffolding being used. Training will also cover procedures to control or minimize those hazards. Training shall also include the seriousness of scaffold hazards such as

- > Falls
- Unsafe Access
- > Falling Objects
- **Electrocution**
- > Structure Collapse

Retraining

When Island Acoustics, LLC has reason to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the employer shall retrain such employee so that the prerequisite proficiency is regained. Retraining is required in at least the following situations:

- 1. Where changes at the worksite present a hazard about which an employee has not been previously trained; or
- 2. Where changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained; or
- 3. Where inadequacies in an affected employees work involving scaffolds indicate that the employee has not retained the requisite proficiency.



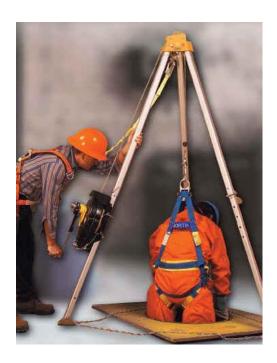
Aerial Lifts

Aerial lifts include the following types of vehicle-mounted aerial devices used to elevate personnel to job sites above the ground: extensible boom platforms, aerial ladders, articulating boom platforms, and vertical towers.

It is the company's policy that all aerial lifts will be considered scaffolds and must comply with general company policy with regards to scaffolds and specific OSHA requirements for each type of aerial lift as well as any recommendations of the manufacturer of the device. This includes formalized and documented training for the particular type of aerial lift to be used on a site.

All employees will abide by the aerial lift manufacturers fall protection requirements including personal fall arrest systems when using aerial lifts.





It is the policy of Island Acoustics, LLC to never work within a classified confined space on any of our projects. In the unlikely event that confined space work is required in the future, the following program section would be implemented.

Confined Space Program Table of Contents

Written Program. 7. Duties of Authorized Entrants. 1. 2. General Requirements. 8. Duties of Authorized Attendants. 3. Permit-Required Confined Space Program. 9. Duties of Entry Supervisors. 4. 10. Rescue and Emergency Services. Permit System. 5. Entry Permit. Procedures for Atmospheric Testing. 11. 6. Training. 12. Format for the Confined Space Permit.

- 1. **Written Program**. Island Acoustics, LLC shall review and evaluate this standard practice instruction on an annual basis, or when changes occur to 29 CFR 1926.1200 Subpart AA, that prompt revision of this document, or when facility operational changes occur that require a revision of this document. Additionally, Island Acoustics, LLC shall review the permit-required confined space program, using the canceled permits retained within 1 year after each entry and revise the program as necessary, to ensure that employees participating in entry operations are protected from permit space hazards.
- 2. **General Requirements**. Island Acoustics, LLC shall establish confined space operational procedures through the use of this document.
 - 2.1 After jobsite evaluation, spaces that meet the following criteria shall be designated as a confined space:
 - 2.1.1 It is large enough and so configured that an employee can bodily enter and perform assigned work and:
 - 2.1.2 Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.) and:
 - 2.1.3 Is not designed for continuous employee occupancy.
 - 2.2 After jobsite evaluation, spaces that meet the following criteria shall be designated as permit required confined space:
 - 2.2.1 Contains or has a potential to contain a hazardous atmosphere.
 - 2.2.2 Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor, which slopes downward and tapers to a smaller cross-section.
 - 2.2.3 Contains any other recognized serious safety or health hazard.

General Requirements

- 2.3 Facility Evaluation. Island Acoustics, LLC shall evaluate its jobsites to determine if any spaces meet the criteria for designation as a confined space.
- 2.4 Confined Space Identification.
 - 2.4.1 Permit-Required Confined Spaces. Those spaces meeting the criteria delineated in this section and having a known potential to contain hazardous atmospheres shall be designated as permit-required confined spaces. All spaces shall be considered permit-required confined spaces until the pre-entry procedures demonstrate otherwise. Island Acoustics, LLC shall inform exposed employees, by posting danger signs, conducting awareness training, or by any other equally effective means, of the existence, location of, and the dangers posed by the permit confined spaces. A sign reading "DANGER PERMIT REQUIRED CONFINED SPACE, DO NOT ENTER" or similar language shall be used to satisfy the requirement for a sign.
 - 2.4.2 Non-Permit Confined Spaces. Those spaces meeting the criteria delineated in this section that do not have a known potential to contain a hazardous atmosphere shall be designated as non-permit confined spaces.



- 2.5 Confined Space listing. Island Acoustics, LLC, once having evaluated a jobsite, shall maintain a detailed listing that permanently identifies locations meeting the criteria for a confined space.
- 2.6 If Island Acoustics, LLC decides that only specific employees shall enter permitted spaces, Island Acoustics, LLC shall take effective measures to prevent non-trained employees from entering the permit-required confined spaces.
- 2.7 For employees that are required to perform work in permit-required confined spaces. Island Acoustics, LLC shall implement the permit-required confined space entry program as delineated within this instruction. This written program shall be available for inspection by employees, their authorized representatives, and authorized government inspectors.
- 2.8 Non-Permit Required Confined Spaces. Non-permit required confined spaces shall be designated where the atmosphere and safety conditions can be controlled. Confined spaces may be entered without the need for a written permit or attendant provided that:
 - 1. The space is determined not to be a permit-required confined space.
 - 2. The space can be maintained in a safe condition for entry by mechanical ventilation alone.

All spaces shall be considered permit-required confined spaces until the pre-entry procedures demonstrate otherwise. Island Acoustics, LLC shall ensure that any employee required or permitted to pre-check or enter a confined space shall have successfully completed the training as required by this instruction. A written copy of operating and rescue procedures as required by this instruction shall be at the work site for the duration of the job. A site specific Confined Space Pre-Entry Check List must be completed by the Entry Supervisor before entry into a confined space. This list shall verify completion of the items required to verify safe entry. This checklist shall be kept at the job site for the duration of the job. If circumstances dictate an interruption in the work, the permit-required confined space must be re-evaluated and a new checklist must be completed. Assuming the conditions set forth in the paragraphs listed below can be met, the following elements of the permit required confined space program need not be complied with if: (see 2.8.1 - 2.8.3)

- (1) Permit required confined space program.
- (2) Permit system.
- (3) Entry permit.
- (4) Duties of authorized entrants.
- (5) Duties of attendants.
- (6) Duties of entry supervisors.
- (7) Rescue and emergency services.
- 2.8.1 It can be demonstrated that the only hazard posed by the permitted space is an actual or potentially hazardous atmosphere.
- 2.8.2 It can be demonstrated that continuous forced air ventilation alone is sufficient to maintain the space safe for entry.
- 2.8.3 Monitoring and inspection data supports the demonstrations required by paragraphs 2.8.1 and 2.8.2.



- 2.9 If an initial entry of the permit space is necessary to obtain monitoring and inspection data. Worst case shall be assumed and the full provisions of permit-required confined space entry procedures shall be implemented.
- 2.10 Entry can be performed by Island Acoustics, LLC personnel, once determinations and supporting data required by paragraphs 2.8.1, 2.8.2, and 2.8.3 are documented, and are made available to each employee who enters the permit space.
- 2.11 Reclassification of a permit space after all hazards within the space have been eliminated. The following requirements apply to entry into permit spaces that meet the conditions set forth in paragraphs 2.8.1, 2.8.2, and 2.8.3. No Island Acoustics, LLC personnel shall enter the confined space unless:
 - 2.11.1 Conditions making it unsafe to remove an entrance cover are eliminated before the cover is removed.
 - 2.11.2 The opening at entrance covers are guarded by a railing, temporary cover, or other temporary barrier that shall prevent accidental fall-through and shall protect each employee working in the space from foreign objects entering the space.
 - 2.11.3 The internal atmosphere has been tested, with a calibrated direct-reading instrument, for the following conditions in the order given:

(1) Oxygen content. (19.5% - 23.5%)

OSHA Mandated **OSHA** Mandated

(2) Flammable gases and vapors.

OSHA Mandated

(3) Potential toxic air contaminants.

(4) Airborne combustible dusts.

Site Specific

- 2.12 There may be no hazardous atmosphere within the space whenever any employee is inside the space.
- 2.13 Continuous forced air ventilation shall be used, as follows:
 - 2.13.1 No employee may enter the space until testing confirms that the forced air ventilation has eliminated any hazardous atmosphere.
 - 2.13.2 The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or shall be present within the space and shall continue until all employees have left the space.
 - 2.13.3 The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.
 - 2.13.4 The atmosphere within the space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere.
 - 2.13.5 If a hazardous atmosphere is detected during entry:
 - (1) All employees shall evacuate.
 - (2) The space shall be evaluated to determine how the hazardous atmosphere developed.
 - (3) Measures shall be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

Permit Required Confined Space Certification. Island Acoustics, LLC shall verify that the space is safe for



- 2.14 entry and that the measures required by a written certification permit meeting the criteria in 29 CFR 1926.1200 are accomplished. This written certification shall contain as a minimum; the date, the location of the space, and the signature of the person providing the certification. The certification shall be made before entry and shall be made available to each employee entering the space.
 - 2.14.1 The following personnel are qualified to certify safe entry for Island Acoustics, LLC personnel entering confined spaces:

Project Superintendent:	
Entry Supervisor:	
Superintendent Designee:	

- 2.15 Non-Permit Required Confined Space Certification. When there are changes in the use or configuration of a non-permit confined space that might increase the hazards to entrants, Island Acoustics, LLC shall reevaluate that space and, if necessary, reclassify it as a permit-required confined space.
- 2.16 Permit to Non-Permit Reclassification. A space classified by Island Acoustics, LLC as a permit-required confined space shall be reclassified as a non-permit confined space under the following conditions:
 - 2.16.1 If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated without entry into the space, the permit space may be reclassified as a non-permit confined space for as long as the non-atmospheric hazards remain eliminated.
 - 2.16.2 If it is necessary to enter the permit space to eliminate hazards, such entry shall be performed under the assumption that a hazard exists. If testing and inspection during that entry demonstrate that the hazards within the permit space have been eliminated, the permit space may be reclassified as a non-permit confined space for as long as the hazards remain eliminated.
 - <u>NOTE:</u> Control of atmospheric hazards through forced air ventilation alone does not constitute elimination of the hazards. Periodic monitoring shall be conducted to ensure forced air ventilation maintains a safe worker environment for reclassification to a non-permit confined space.
 - 2.16.3 Island Acoustics, LLC shall document the basis for determining that all hazards in a permit space have been eliminated, through a certification that contains as a minimum; the date, the location of the space, and the signature of the person making the determination. The certification shall be made available to each employee entering the space.
 - 2.16.4 If hazards arise within a permit space that has been declassified to a non-permit space, each employee in the space shall immediately exit the space and notify their supervisor. Island Acoustics, LLC shall then reevaluate the space and determine whether it must be reclassified as a permit space, in accordance with other applicable provisions of this instruction.



- 2.17. Island Acoustics, LLC Responsibilities Regarding Contractor Operations in Permitted Confined Spaces. When Island Acoustics, LLC arranges to have employees of another employer (contractor) perform work that involves permit space entry, then Island Acoustics, LLC shall:
 - 2.17.1. Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with the Island Acoustics, LLC permit space program meeting the requirements of this instruction.
 - 2.17.2. Apprise the contractor of the elements, including the hazards identified and the host employer's experience with the space, that make the space in question a permit space;
 - 2.17.3. Apprise the contractor of any precautions or procedures that Island Acoustics, LLC has implemented for the protection of employees in or near permit spaces where contractor personnel shall be working.
 - 2.17.4. Coordinate entry operations with the contractor, when both Island Acoustics, LLC personnel and contractor personnel shall be working in or near permit spaces.
 - 2.17.5. Debrief the contractor at the conclusion of the entry operation regarding the Island Acoustics, LLC permit space program, and any hazards confronted or created in the concerned permit spaces during entry operations.
- 2.18. Contractor Responsibilities Regarding Contractor Operations in Permitted Confined Spaces. In addition to complying with the permit space requirements that apply to all employees of Island Acoustics, LLC, each contractor who is retained to perform permit space entry operations shall:
 - 2.18.1. Obtain any available information regarding permit space hazards and entry operations from Island Acoustics, LLC
 - 2.18.2. Coordinate entry operations with Island Acoustics, LLC, when both Island Acoustics, LLC personnel and contractor personnel shall be working in or near permit spaces.
 - 2.18.3. Inform Island Acoustics, LLC of the permit space program that the contractor shall follow and of any hazards confronted or created in permit spaces within this facility or others belonging to Island Acoustics, LLC, either through a debriefing or during the entry operation.



Permit Required Confined Space Program

- 3. **Permit-Required Confined Space Program**. Under the permit-required confined space program required by 29 CFR 1926.1200, Island Acoustics, LLC shall:
 - 3.1. Implement the measures necessary to prevent unauthorized entry.
 - 3.2. Identify and evaluate the hazards of permit spaces before employees enter them.
 - 3.3. Develop and implement the means, procedures, and practices necessary for safe permit space entry operations, including, but not limited to, the following:
 - 3.3.1. Specifying acceptable entry conditions.
 - 3.3.2. Isolating the permit space.
 - 3.3.3. Purging, inserting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards.
 - 3.3.4. Provide pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards.
 - 3.3.5. Verify that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
 - 3.3.6. Develop and utilize checklists based on this policy instruction and 29 CFR 1926.1200.
 - 3.4. Provide the following equipment at no cost to employees, maintain that equipment properly, and ensure that employees are train in the proper use of the equipment:
 - 3.4.1. Testing and monitoring equipment needed to determine if hazardous conditions exist or to verify that they do not exist.
 - 3.4.2. Ventilating equipment needed to obtain acceptable air quality entry conditions.
 - 3.4.3. Communications equipment necessary for communication between personnel involved in the entry operation.
 - 3.4.4. Personal protective equipment insofar as feasible engineering and work practice controls do not adequately protect employees.
 - 3.4.5. Lighting equipment needed to enable employees to see well enough to work safely and to exit the space quickly in an emergency.
 - 3.4.6. Barriers and shields as required to protect workers from pedestrian and vehicular traffic.
 - 3.4.7. Ladders, needed for safe ingress and egress by authorized entrants.



- 3.4.8. Rescue, Retrieval, and Emergency equipment needed to extract or treat injured personnel, except to the extent that the equipment and or service is provided by rescue services that are immediately available.
- 3.4.9. Any other equipment necessary for safe entry into and rescue from permitted spaces at our facility.
- 3.4.10. Principal equipment needed to conduct confined space operations. The below listed intrinsically safe equipment, as a minimum, shall be maintained where required for confined space operations:
- 1. Air Compressors, (as required)
- 2. Air purifying respirators (as required)
- 3. Body harnesses
- 4. Emergency escape breathing app. (as reqd.)
- 5. Escape ladders for depths of 4 feet of more
- 6. Extraction cable and lanyards
- 7. Eye Protection Equipment
- 8. First Aid Kits
- 9. Hand tools, (as required)
- 10. Head Protection Equipment
- 11. Hearing Protection Equipment, (as required)
- 12. Intrinsically safe lighting equipment, (as required)
- 13. Lockout- Tag-out Equipment, (as required)
- 14. Multi-gas monitors
- 15. Personal Protective clothing
- 16. Radio Communication Systems, (as required)
- 17. Rescue Tripod/davit arm and winch
- 18. SCBA Equipment, (as required)
- 19. Signage, (as required)
- 20. Supplied Air Respirators, (as required)
- 21. Time-keeping Equipment
- 22. Ventilation Equipment



- 3.5. Evaluation of Permitted Space Conditions. Island Acoustics, LLC shall evaluate permit space conditions as follows when entry operations are conducted:
 - 3.5.1. Test conditions in the permit space to determine if acceptable entry conditions exist before entry is authorized to begin, except that, if isolation of the space is not feasible because the space is large or is part of a continuous system (such as a sewer), pre-entry testing shall be performed to the extent feasible before entry is authorized and, if entry is authorized, entry conditions shall be continuously monitored in the areas where authorized entrants are working.
 - 3.5.2. Test or monitor the permit space as necessary to determine if acceptable entry conditions are being maintained during the course of entry operations.
 - 3.5.3. When testing for atmospheric hazards, use the following protocol; first for oxygen, then for combustible gases and vapors, and then for toxic gases and vapors.

<u>NOTE:</u> Atmospheric testing conducted in accordance with the "procedures for atmospheric testing" section of this instruction or OSHA shall be used to satisfy this requirement.

<u>NOTE:</u> Attendants may be assigned to monitor more than one permit space provided their duties can be effectively performed for each permit space that is monitored. Likewise, attendants may be stationed at any location outside the permit space to be monitored as long as their duties can be effectively performed for each permit space that is monitored.

- 3.5.4. If multiple spaces are monitored by a single attendant, the permit shall be annotated to provide the means and procedures by which the attendant is to respond to an emergency affecting one or more of the permit spaces being monitored.
- 3.5.5. When a confined space entry is to take place, Island Acoustics, LLC, as part of the preplanning process, shall designate in advance the persons who are to have active roles in the entry operation. Additionally the duties of each such employee shall be identified, and provided with the required training required by the training section of this instruction. The confined space entry team shall include but is not limited to the following:
 - (1) Atmospheric monitoring personnel
 - (2) Attendants
 - (3) Authorized entrants
 - (4) Certifying personnel
 - (5) Entry supervisors
 - (6) Rescue/Emergency services personnel
- 3.5.6. Island Acoustics, LLC shall develop procedures prior to the commencement of confined space operations for the following:
 - (1) Summoning rescue and emergency services.
 - (2) Rescuing entrants from permit spaces.



- (3) Providing necessary emergency services for rescue.
- (4) Preventing unauthorized personnel from attempting a rescue.
- 3.5.7. Development and implementation for the preparation, issuance, use, and cancellation of entry permits shall be as follows:
 - 3.5.7.1. When employees of contractor personnel or non-Island Acoustics, LLC employees are working simultaneously as authorized entrants in a permit space, the certifying official of the permit (or pre-designated representative) shall ensure that all parties concerned are aware of the accepted entry procedures for the specific operation. This shall ensure entry operations are properly coordinated.
 - 3.5.7.2. The certifying official of the permit (or pre-designated representative) shall ensure that all parties concerned are aware of the accepted procedures necessary for concluding the entry after entry operations have been completed (such as closing off a permit space and canceling the permit).
 - 3.5.7.3. Island Acoustics, LLC shall immediately review and as necessary halt and revise entry operations when there is reason to believe that the measures taken under the permit space program may not protect employees. The focus shall be directed at the correction of deficiencies found to exist before subsequent entries are authorized. Examples of circumstances requiring the review of the permit-required confined space program are as a minimum:
 - Any unauthorized entry of a permit-space.
 - The detection of hazards not covered by the initial permit.
 - The detection of a condition prohibited by the permit.
 - The occurrence of an injury or near-miss during entry.
 - A change in the use or configuration of a permit space.
 - Employee complaints about the effectiveness of the program.
 - 3.5.7.4. Review of the permit-required confined space program, using the canceled permits retained shall be accomplished within one year after each entry and the program revised as necessary, to ensure that employees participating in entry operations are protected from permit space hazards.

<u>NOTE:</u> Single annual reviews covering all entries performed during a 12-month period shall be accomplished. If no entry is performed during a 12-month period, no review is necessary.



- 4. **Permit System**. To comply with the permit-system required by 29 CFR 1926.1200, Island Acoustics, LLC shall:
 - 4.1 Before entry is authorized, document the completion of the following measures:
 - 4.1.1. Specifying acceptable entry conditions.
 - 4.1.2. Isolating the permit space.
 - 4.1.3. Purging, inserting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards.
 - 4.1.4. Provide pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards.
 - 4.1.5. Verify that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
 - 4.1.6. Develop and utilize checklists based on this standard practice instruction and OSHA.
 - 4.2. Before entry begins, the entry supervisor identified on the permit shall sign the entry permit to authorize entry.
 - 4.3. The completed permit shall be made available at the time of entry to all authorized entrants, by posting it at the entry portal or by any other equally effective means, so that the entrants can confirm that pre-entry preparations have been completed.
 - 4.4. The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit.
 - 4.5. The entry supervisor shall terminate entry and cancel the entry permit when:
 - 4.5.1. The entry operations covered by the entry permit have been completed.
 - 4.5.2. A condition that is not allowed under the entry permit arises in or near the permit space.
 - 4.6. Island Acoustics, LLC shall retain each canceled entry permit for at least 1 year to facilitate the review of the permit-required confined space program. Any problems encountered during an entry operation shall be noted on the pertinent permit so that appropriate revisions to the permit space program can be made.



- 5. **Entry Permit**. Island Acoustics, LLC shall develop or use a standardized entry permit form that documents compliance with this section and authorizes entry to a permit space. As a minimum the permit in use shall identify the following:
 - 5.1. The permit space to be entered.
 - 5.2. The purpose of the entry.
 - 5.3. The date and the authorized duration of the entry permit.
 - 5.4. The authorized entrants within the permit space, by name or by such other means (for example, through the use of rosters or tracking systems) as shall enable the attendant to determine quickly and accurately, for the duration of the permit, which authorized entrants are inside the permit space. If a tracking system is used for certain entries this requirement may be met by inserting a reference on the entry permit as to the means used, such as a roster or tracking system, to keep track of the authorized entrants within the permit space.
 - 5.5. The personnel, by name, currently serving as attendants.
 - 5.6. The individual, by name, currently serving as entry supervisor, with a space for the signature or initials of the entry supervisor who originally authorized entry.
 - 5.7. The hazards of the permit space to be entered.
 - 5.8. The measures used to isolate the permit space and to eliminate or control permit space hazards before entry. Such as; the lockout or tagging of equipment and procedures for purging, inserting, ventilating, and flushing permit spaces.
 - 5.9. The acceptable entry conditions.
 - 5.10. The results of initial and periodic atmospheric tests performed, accompanied by the names or initials of the testers and by an indication of when the tests were performed.
 - 5.11. The rescue and emergency services that can be summoned and the means (such as the equipment to use and the numbers to call) for summoning those services.
 - 5.12. The communication procedures used by authorized entrants and attendants to maintain contact during the entry.
 - 5.13. Equipment, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment, to be provided for compliance with the permit requirement.
 - 5.14. Any other information whose inclusion is necessary, given the circumstances of the particular confined space, in order to ensure employee safety.
 - 5.15. Any additional permits, such as for hot work that have been issued to authorize work in the permit space.



- 5.16. Island Acoustics, LLC shall provide training so that all employees whose work is regulated by this section acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned under this section.
- 6. **Training**. Island Acoustics, LLC shall develop a standardized training format to meet the requirement for a safe confined space entry.
 - 6.1. Training shall be provided to each affected employee:
 - 6.1.1. Before the employee is first assigned duties that require a confined space entry.
 - 6.1.2. Before there is a change in assigned duties.
 - 6.1.3. Whenever there is a change in permit space operations that presents a hazard about which an employee has not previously been trained.
 - 6.1.4. Whenever Island Acoustics, LLC has reason to believe that there are deviations from the permit space entry procedures required by this instruction or inadequacies in the employee's knowledge or use of these procedures.
 - 6.2. The training shall establish employee proficiency in the duties required by this instruction and shall introduce new or revised procedures, as necessary, for compliance with this instruction or when future revisions occur.
 - 6.3. Island Acoustics, LLC shall certify that the training required by this section has been accomplished. The certification shall contain each employee's name, the signatures or initials of the trainers, and the dates of training.
- 7. **Duties of Authorized Entrants**. Island Acoustics, LLC shall ensure that all authorized entrants:
 - 7.1. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
 - 7.2. Properly use equipment as required by OSHA Subpart AA.
 - 7.3. Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space as required by this section.
 - 7.4. Alert the attendant whenever:
 - 7.4.1. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation.
 - 7.4.2. The entrant detects a prohibited condition.
 - 7.5. Exit from the permit space as quickly as possible whenever:
 - 7.5.1. An order to evacuate is given by the attendant or the entry supervisor.
 - 7.5.2. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation.
 - 7.5.3. The entrant detects a prohibited condition.
 - 7.5.4. An evacuation alarm is activated.



- 8. **Duties of Authorized Attendants.** Island Acoustics, LLC shall ensure that each attendant:
 - 8.1. Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
 - 8.2. Is aware of possible behavioral effects of hazard exposure in authorized entrants.
 - 8.3. Continuously maintains an accurate count of authorized entrants in the permit space and ensures that the means used to identify authorized entrants under this section accurately identifies who is in the permit space.
 - 8.4. Remains in a pre-designated location outside the permit space during entry operations until relieved by another attendant.
 - <u>NOTE:</u> When Island Acoustics, LLC's permit entry program allows attendant entry for rescue, attendants may enter a permit space to attempt a rescue if they have been trained and equipped for rescue operations as required by the "rescue and emergency services" section of this instruction and if they have been relieved as required by this section.
 - 8.5. Communicates with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space.
 - 8.6. Monitors activities inside and outside the space to determine if it is safe for entrants to remain in the space and orders the authorized entrants to evacuate the permit space immediately under any of the following conditions.
 - 8.6.1. If the attendant detects a prohibited condition.
 - 8.6.2. If the attendant detects the behavioral effects of hazard exposure in an entrant.
 - 8.6.3. If the attendant detects a situation outside the space that could endanger the entrants.
 - 8.6.4. If the attendant cannot effectively and safely perform all the duties required under this section.



- 8.7. Summon rescue and other emergency services as soon as the attendant determines that entrants may need assistance to escape from permit space hazards.
- 8.8. Takes the following actions when unauthorized persons approach or enter a permit space while entry is underway:
 - 8.8.1. Warn the unauthorized persons that they must stay away from the permit space.
 - 8.8.2. Advise the unauthorized persons that they must exit immediately if they have entered the permit space.
 - 8.8.3. Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space.
- 8.9. Performs non-entry rescues as specified by Island Acoustics, LLC's rescue procedure.
- 8.10. Performs no duties that might interfere with the attendant's primary duty to monitor and protect the entrants.
- 9. **Duties of Entry Supervisors.** Island Acoustics, LLC shall ensure that each entry supervisor:
 - 9.1. Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
 - 9.2. Verifies, by checking that the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin.
 - 9.3. Terminates the entry and cancels the permit as required in accordance with the "permit section" this instruction.
 - 9.4. Verifies that rescue services are available and that the means for summoning them are operable.
 - 9.5. Ensures removal of unauthorized individuals who enter or who attempt to enter the permit space during entry operations.
 - 9.6. Determines, whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.



- 10. **Rescue and Emergency Services**. The following requirements apply to Island Acoustics, LLC projects that have permit-required confined spaces.
 - 10.1. Island Acoustics, LLC shall ensure that local rescue services are aware of the work site including entry into the project and the location of the confined spaces within the project.
- 11. **Procedures for Atmospheric Testing**. Atmospheric testing for confined space entry is required for two distinct purposes: Evaluation of the hazards of the permit space and verification that acceptable entry conditions for entry into that space exist.
 - 11.1. Evaluation Testing. Island Acoustics, LLC shall ensure that the atmosphere of a confined space is analyzed using equipment of sufficient sensitivity and specificity to identify and evaluate any hazardous atmospheres that may exist or arise. This is required to ensure that appropriate permit entry procedures specific to the operation can be developed and acceptable entry conditions stipulated for that specific space. Evaluation and interpretation of these data, and development of the entry procedure, shall be done by, or reviewed by, a technically qualified professional (e.g., OSHA consultation service, or certified industrial hygienist, registered safety engineer, certified safety professional, certified marine engineer etc.) based on evaluation of all serious hazards. The internal atmosphere shall be tested, with a calibrated direct-reading instrument, for the following conditions in the order given:

(1) Oxygen content. (19.5% - 23.5%)
 (2) Flammable gases and vapors.
 (3) Potential toxic air contaminants.
 (4) Airborne combustible dusts
 OSHA Mandated OSHA Mandated Site Specific

11.2. Verification Testing. The atmosphere of a permit space which may contain a hazardous atmosphere shall be tested for residues of all contaminants identified by evaluation testing using permit specified equipment to determine that residual concentrations at the time of testing and entry are within the range of acceptable entry conditions. Results of testing (i.e., actual concentration, etc.) shall be recorded on the permit in the space provided adjacent to the stipulated acceptable entry condition. The atmosphere shall be verified, with a calibrated direct-reading instrument, for the following conditions in the order given:

(1) Oxygen content. (19.5% - 23.5%)
 (2) Flammable gases and vapors.
 (3) Potential toxic air contaminants.
 (4) Airborne combustible dusts
 OSHA Mandated OSHA Mandated Site Specific



Atmospheric Testing Procedures and CS Format

- 11.3. Duration of Testing. Measurement of values for each atmospheric parameter shall be made for at least the minimum response time of the test instrument specified by the manufacturer.
- 11.4. Testing Stratified Atmospheres. When monitoring for entries involving a descent into atmospheres that may be stratified, the atmospheric envelope shall be tested a distance of approximately 4 feet (1.22 m) in the direction of travel and to each side. If a sampling probe is used, the entrant's rate of progress shall be slowed to accommodate the sampling speed and detector response. The stratified atmosphere shall be tested, with a calibrated direct-reading instrument, for the following conditions in the order given:

(1) Oxygen content. (19.5% - 23.5%)

OSHA Mandated

(2) Flammable gases and vapors.

OSHA Mandated

(3) Potential toxic air contaminants.

OSHA Mandated

(4) Airborne combustible dusts

Site Specific

12. Format for Confined Space Permit- Refer to 29 CFR 1926.1200- Subpart CC



Island Acoustics, LLC Section 20: Cranes & Rigging Procedure Policy

Service Cranes



Island Acoustics, LLC does not own, supply or operate cranes. In the event that a crane is required to be used to hoist material or equipment on a particular job site it will be done so through a subcontractor. Such subcontractor to Island Acoustics, LLC will be required to comply with all crane safety requirements including but not limited to the following:

All the requirements of OSHA 29 CFR 1926 Subpart CC including crane and rigging equipment inspection criteria and trained personnel including licensed operators, riggers and signal personnel. In addition the following will be required if/when applicable:

- The particular crane manufacturer's requirements
- ANSI B30.2.0-67
- ANSI B30.2-43
- ANSI B30.5-68
- ASME
- NYC Department of Cranes and Derricks Division Requirements including the latest edition of NYC Building Code Chapter 33 for all crane work taking place within the five boroughs of New York City.

Any and all required documentation including inspections, licenses, permits, design drawings and crane safety meeting minutes will be furnished to Island Acoustics, LLC field management prior to actual crane work taking place. This documentation will be maintained in our site field office and when necessary produced to our clients or agency representatives having jurisdictional responsibility for this type of work.





Purpose

This document, **specific towards our warehouse workers**, establishes the requirements for properly using and operating lift trucks and the requirements for properly training and evaluating operators of Island Acoustics, LLC. In the unlikely event that a jobsite would require our use of a forklift, this policy would apply.

2.0 General Requirements

- 2.1 Lift trucks shall be equipped with a 10 lb. ABC type fire extinguisher, within reach of the operator.
- 2.2 Operator's manual shall be located in the cab.
- 2.3 Operator shall have received and passed authorized forklift training in keeping with the regulatory and manufacture requirements. Training and certification is to be specific for the equipment they are to use and maintained on site by our superintendents or foremen.
- 2.4 Lift trucks shall be equipped with approved overhead protection at all times, in addition to rollover protection (ROPS).
- 2.5 Where possible, lift trucks shall be kept off of all public roads.
- 2.6 Lift trucks shall not be operated on any public roads during hours of darkness.



General Requirements

- 2.7 When operating on public roads, lift trucks shall obey all traffic laws, including riding on the right side of the road and signaling turns and stops. Lift trucks shall also be accompanied by Island Acoustics, LLC employees for traffic control purposes- flagging.
- Only fork trucks that are equipped with a yellow warning light (operating) and slow moving vehicle sign (fanny flag) shall be permitted on public roads.
- 2.9 Lift trucks shall never exceed a fast walking pace while on the project.
- 2.10 Lift trucks shall be equipped with back-up alarms and a single amber flashing or revolving warning light.
- 2.11 Modifications and additions which affect capacity and safe operation shall not be performed without manufactures prior written approval.
- 2.12 Holes shall not be cut in the forks nor should any shackles be used in holes not provided by the manufacturer.
- 2.13 Engines shall always be turned off while refueling. The lift truck shall be kept clean and free of debris. Materials, tools, or other loose items are not to be on the cab floor or on top of the engine cover.
- 2.14 Only approved forklifts with the proper designations shall be used in areas with continual, intermittent or periodic hazardous atmospheres.
- 2.15 Personnel are prohibited from being between the front and the rear of a running lift truck and stationary objects such as walls, columns, vehicles, stacked/stored materials, or other stationary objects, which could become crushing hazards.
- 2.16 All personnel operating a fork truck or Lift truck must be in compliance with OSHA regulations regarding fork lift operations.



3.0 <u>Vehicle Safety Checks</u>

- 3.1 The following items shall be checked and documented at the beginning of each shift by the operator or project mechanic:
 - 3.1.1 All tires for excessive wear, deep cuts, and proper inflation.
 - 3.1.2 Horns, lights, blinkers, and all other visual warning devices.
 - 3.1.3 All lift, lower, tilt, and attachment controls for proper operation and for any visual signs of hydraulic leakage.
 - 3.1.4 Brakes for proper operation and system leakage. The operator shall familiarize himself/herself with their proper operation.
 - 3.1.5 Steering system for excessive play or binding.
 - 3.1.6 Transmission functions.
 - 3.1.7 Forks and fork-retaining pins for damage.
 - 3.1.8 The general appearance and condition of the upright, operator's seat, and hydraulic hoses.
 - 3.1.9 Lift truck's oil levels, fuel level, battery, and radiator coolant shall be checked each day. A general inspection shall be made for fluid leakage. All leaks shall be contained and cleaned up.
 - 3.1.10 Fire extinguisher for serviceability, charge, and inspection tag.
 - 3.1.11 Forks and masts for condition with no holes or other structural damage.
 - 3.1.12 All nameplates and marking are in place and maintained in a legible condition.
 - 3.1.13 Any malfunction of the equipment shall be reported immediately and taken out of service until repaired.



4.0 <u>Training Requirements</u>

- 4.1 Trainees shall receive and passed authorized forklift training in keeping with the OSHA requirements. Training and certification is to be specific for the equipment they are to use.
- 4.2 Extend-a-boom lift trucks require training covering the dynamics of boom length, boom angle, and load capacity.
- 4.3 Island Acoustics, LLC subcontractors shall hold training sessions in accordance to national laws, regulations and manufacture requirements.
- 4.4 A certificate of completion shall be issued at the successful completion of all phases of the training program. A record of operators successfully completing the training shall be retained by the safety department in our main office.
- 4.5 The Island Acoustics, LLC Safety Director may arrange to hold these training classes on the project for contractors, if demand warrants.
- 4.6 This policy shall be used as part of the operator's training. A copy of this policy shall be given to the operator of company-operated forklifts.
- 4.7 The training shall consist of a combination of formal instruction, practical training, and evaluation of the operator's ability to operate the forklift safely and their performance in the workplace.
- 4.8 All training and evaluations shall be conducted by persons who have the knowledge, training, and experience to train lift truck operators and evaluate their performance.
- 4.9 Training programs shall cover the following lift truck topics:
 - 4.9.1 Operating instruction, warnings, and precautions for the type(s) of forklifts the operator will be authorized to operate.
 - 4.9.2 Differences between the forklift and automobiles.
 - 4.9.3 Truck controls and instrumentation where they are located, what they do, and how they work.
 - 4.9.4 Engine of motor operation.
 - 4.9.5 Steering and maneuvering.
 - 4.9.6 Visibility (including all restrictions due to loading and blind spots).



Training Requirements

4.9.7	Fork and attachment adaptation, operation, and use limitation.	
4.9.8	Vehicle capacity and the dynamics of a loads center of gravity moving away from the fork's backstop in how the forklift's capacity is reduced.	
4.9.9	Vehicle stability and the dynamics of the truck's center of gravity, the load's center of gravity, and their combined center of gravity with relation to how "Tip Over" can occur.	
4.9.10	Any vehicle inspection and maintenance that the operator will be required to perform.	
4.9.11	Refueling and/or charging of batteries.	
4.9.12	Operating limitations.	
4.9.13	Any other operating instruction, warning, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.	
Training programs shall cover the following workplace-related topics:		
Training p	rograms shall cover the following workplace-related topics:	
Training p	rograms shall cover the following workplace-related topics: Surface condition where the vehicle will be operated.	
4.10.1	Surface condition where the vehicle will be operated.	
4.10.1 4.10.2	Surface condition where the vehicle will be operated. Awareness of overhead hazards.	
4.10.1 4.10.2 4.10.3	Surface condition where the vehicle will be operated. Awareness of overhead hazards. Composition of loads to be carried and load stability.	
4.10.1 4.10.2 4.10.3 4.10.4	Surface condition where the vehicle will be operated. Awareness of overhead hazards. Composition of loads to be carried and load stability. Load manipulation, stacking, and un-stacking.	

Ramps and other sloped surfaces that could affect the vehicle's stability.



4.10.8

4.10

Training Requirements

- 4.10.9 Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide of diesel exhaust.
- 4.10.10 Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.
- 4.11 Refresher training shall be given to the operator when:
- 4.11.1 The operator has been observed operating the vehicle in an unsafe manner.
- 4.11.2 The operator has been involved in an accident or near-miss incident.
- 4.11.3 The operator has received an evaluation that reveals that the operator is not operating the vehicle safely.
- 4.11.4 The operator is assigned to drive a different type of forklift / buggy.
- 4.11.5 A condition in the workplace changes in a manner that could affect safe operation of the truck.
- 4.12 An evaluation of each forklift operator's ability and performance shall be conducted at least once every three years.

5.0 Proper Operating Methods

- 5.1 The general rules for driving an automobile should be followed, such as traveling on the right side of a main traffic aisle, stopping at all intersections, slowing down when approaching corners, starting and stopping smoothly, and watching out for pedestrians.
- 5.2 Always face the direction of travel.
- 5.3 Lift trucks are not permitted on personnel elevators.
- When carrying a large or bulky load that obstructs visibility, travel in reverse. Look where you are going. Use a "Spotter" if unable to travel in reverse.
- 5.5 Do not drive over electrical cords, hoses, or other objects lying on the floor.



Proper Operating Methods

- 5.6 Maintain a healthy mental attitude.
- 5.7 When negotiating turns, reduce speed to a safe level.
- 5.8 Always be aware of the lift truck's tail swing area.
- 5.9 Stop, sound your horn, and proceed with caution when entering buildings, enclosure, alley, or at blind corners.
- 5.10 Keep a safe distance (three truck lengths) behind other trucks traveling in the same direction and never drive side-by-side.
- 5.11 Stop completely before backing up. Lift trucks reverse quickly and can cause operators to lose the load. Stop and start smoothly.
- 5.12 Cross railroad tracks diagonally and never park closer than 10 feet to the center of railroad tracks.
- 5.13 When parking the lift truck, place the fork's tips on the floor, tilted forward, set the parking brake and remove the key. Lift trucks shall not be parked obstructing emergency vehicle routes, walkways, doorways, electrical panels, fire extinguishers/hydrants, emergency phones, or eye wash/showers.
- 5.14 Space forks to fit the load, this maintains proper balance.
- 5.15 Travel with the forks close to the floor or ground with or without a load.
- 5.16 Don't lift unstable loads.
- 5.17 Don't double up loads.
- 5.18 Don't add counter weights. Split the load.
- 5.19 All loads should be picked up in the center.
- 5.20 Transporting of compressed gas cylinders shall be in an approved cart secured to the fork backstop.
- 5.21 Be sure forks are all the way under the load and the mast tilted all the way back.



Proper Operating Methods

- 5.22 Lift trucks carrying a heavy load shall have the load up-grade when operating on a ramp or grade in excess of 10 percent.
- 5.23 Unloaded trucks shall be operated on ramps or grades with the forks downgrade.
- 5.24 Ascend or descend grades or ramps slowly. Use low gear, if needed, on grades and never make a turn while the truck is still on a ramp.
- 5.25 Stay away from the edge of loading docks and never use the lift truck to open or close freight doors.
- 5.26 Always use a proper dock board. Steel plates shift and are dangerous. Before traveling over a dock board, check its capacity and be sure it is secured.
- 5.27 Before entering a truck trailer, or railroad car, its brakes should be set and its wheels blocked. Semi-trailers, not coupled to a tractor, must have, in addition to its landing gear, fixed jacks to prevent upending.
- 5.28 Absolutely no riders are allowed on any type of lift truck.
- 5.29 Keep hands and feet inside the operating compartment of the vehicle.
- 5.30 Personnel are prohibited from standing on the lift truck's forks.
- 5.31 Watch out for pedestrians and never allow anyone to stand or walk under raised forks whether loaded or unloaded.
- 5.32 If a lift truck is to be used to elevate a work platform, use a safety platform with top rail, mid rail, a toe board, and a screen between the personnel in the platform and the lift truck's mast. Platform must be low to the ground for moving an occupied platform.
- 5.33 Slow down on wet or slippery floors or ground.
- 5.34 Don't let unauthorized persons drive lift trucks.
- 5.35 Be sure the floor you operate on, including trailer floors, can support the combined weight of your truck and load.



Proper Operating Methods

- 5.36 Note any low overhead obstacles such as high voltage lines, pipes, sprinklers, or low doorways.
- 5.37 An operator should not push or carry another disabled lift truck with the lift truck.
- 5.38 Avoid parking on an incline.
- 5.39 Lift trucks shall not be allowed to idle for a long period of time in an enclosed area.
- 5.40 The lift trucks shall be used only for its intended purpose; that is to move materials.
- 5.41 Forklifts will have safety belts and they must be used by the operator while the unit is in operation.



Section 22: Written Exposure Control Plan for Respirable Crystalline Silica Dust

Crystalline Silica:

Silica is the second most common mineral on earth, found in the common form as "sand" and "rock". Silica is the compound formed from the elements silicon (Si) and oxygen (O) and has a molecular form of SiO2. The three main forms or 'polymorphs' of silica are alpha quartz, crisobalite and tridymite. The polymer most abundant and most hazardous to human health is alpha quartz and is commonly referred to as crystalline silica.

Health Hazards:

The health hazards of silica occur when breathing in dust. If crystalline silica becomes airborne through construction activities, exposures to fine crystalline silica dust (specifically exposure to the size fraction that is considered to be respirable) can lead to a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs causing thickening and scarring of lung tissue.

Construction workers may develop one of three different types of exposure symptoms depending on the concentration of silica dust and the duration of the exposure. OSHA lists the following types within the Standard:

- Chronic Silicosis: Develops after 10 or more years of exposure to crystalline silica and relatively low concentrations.
- Accelerated Silicosis: Develops 5 to 10 years after initial exposure to crystalline silica at high concentrations.
- Acute Silicosis: Develops within weeks, or 4-5 years, after high exposure to very high concentrations of crystalline silica.

Initially, construction workers with silicosis may have no symptoms; however, as the disease progresses, workers may begin to experience:

- Shortness of breath
- o Severe cough
- o Weakness.

These symptoms worsen over time and can possibly lead to death.

In addition to silicosis, exposure may cause lung cancer, bronchitis, tuberculosis and/or have adverse effects to the immune system and kidneys.

Job Site Tasks:

Construction site tasks that have the potential for creating silica dust include:



Section 22: Written Exposure Control Plan for Respirable Crystalline Silica Dust

Chipping, chopping, cutting, grinding and drilling material that contains respirable crystalline silica.

Introduction to the Corporate Plan:

This section of the Island Acoustics, LLC Corporate Health and Safety Plan is dedicated toward our obligation of addressing the revised OSHA Construction Standard Subpart Z 29 CFR 1926.1153 for Respirable Crystalline Silica. Island Acoustics, LLC will review and evaluate the effectiveness of the written exposure control plan at least annually. We will update this plan as necessary based upon the evaluation.

Oversight and Implementation of the Plan:

This written exposure control plan will be overseen and modified as necessary by our corporate safety director, Mr. Michael Cuttita.

Site compliance and enforcement of this written exposure control plan and the OSHA Standard will be conducted by our respective job site superintendents/ foremen who we, as their employer, deemed as "competent persons" as defined by OSHA.

Our designated site competent person(s) will, at a minimum, make frequent and regular job site inspections during the course of the work day to ensure the site conditions, materials and equipment implemented comply with this written exposure control plan. Further our designated competent persons will be responsible to ascertain employees on their designated job site are trained in compliance with this plan and the OSHA Subpart Z Respirable Crystalline Silica Standard.

Potential Exposure Work:

Island Acoustics, LLC anticipates minimal to no exposures of respirable crystalline silica based upon the construction operations we perform. This includes not reaching an action level of 25 micrograms per cubic meter or the permissible exposure limit of 50 micrograms per cubic meter.

The tasks performed on our projects are the occasional use of hand-held drills including impact hammers and rotary hammer drills, as well as drywall taping and sanding operations The drilling specific work task is found within the OSHA Compliance option # 7 of Table 1 within the Standard.

Compliance with OSHA Table 1, Task 7:

So as to be within compliance with the Standard, Island Acoustics, LLC will only use:

Handheld Rotary Hammer Drills with integrated vacuum dust collection systems, (VDC) in accordance with the equipment manufacturer's requirements and Task #7 of Table 1. In addition, half mask N95 respirators will be worn while preforming any concrete drilling.



Section 22: Written Exposure Control Plan for Respirable Crystalline Silica Dust

Compliance with OSHA in Regards to Taping and Sanding Operations:

So as to be within compliance with the Standard, Island Acoustics, LLC will only use:

• Handheld Drywall Pole Sanders with integrated vacuum dust collection systems (VDC) and shroud in accordance with the equipment manufacturer's requirements. Air monitoring of the area within 20 feet of the worker did NOT have exposure levels above the OSHA Action Level, therefore no CAZ is required.

Please see attached Exposure Results and photos from air sampling performed on a representative jobsite. Samples dated November 2, 2017 (A1, B1, C1). Personal sample and ambient samples were taken performing the task as specified above. Lab analysis indicates respirable silica levels well below the OSHA Standard. Therefore, we intend to use this as objective data and evidence documenting proof of levels below the PEL and Action level so as to be in compliance with the Standard.

• If dry sanding of taped seams is performed, USG Green Lid joint compound will be used. Under normal conditions, performing this operation will not result in exposure to respirable crystalline silica that exceeds the OSHA PEL. Air monitoring of the area within 20 feet of the worker did NOT have exposure levels above the OSHA Action Level, therefore no CAZ is required.

Please see attached Exposure Results and photos from air sampling performed on a representative jobsite. Samples dated November 3, 2017 (A2, B2, C2). Personal sample and ambient samples were taken performing the task as specified above. Lab analysis indicates respirable silica levels well below the OSHA Standard. Therefore, we intend to use this as objective data and evidence documenting proof of levels below the PEL and Action level so as to be in compliance with the Standard.

Housekeeping:

Island Acoustics, LLC will also not engage in dry sweeping for housekeeping purposes nor will compressed air be used to clean clothing, equipment or material on our projects.

In addition to the above tools will also be used in accordance to our Hand and Power Tool Policy found within this Manual.

Under strict compliance monitoring and in accordance with OSHA Table 1, including our air monitoring sample results/collective data:

respiratory protection, air monitoring and medical surveillance will not be required regardless of duration or location of the task we perform.

Employee Training:

Each superintendent/foreman, on their respective job sites, will be responsible to ensure all employees of Island Acoustics, LLC are trained in regard to the OSHA Standard including the following specific topics and requirements:

The Island Acoustics, LLC foreman is the designated competent person for ensuring compliance with this Plan and the OSHA Subpart Z Respirable Crystalline Silica Standard. Each employee will be made aware of this.



Section 22: Written Exposure Control Plan for Respirable Crystalline Silica Dust

The OSHA Standard section for Respirable Crystalline Silica and the health hazards associated with exposure to respirable crystalline silica. This includes cancer, lung effects, immune system effects and kidney effects.

In conjunction with the OSHA Hazard Communication Standard we will inform our employees that they have access to labels and safety data sheets (SDS) for products that contain crystalline silica.

Any specific tasks we perform in the workplace that could result in exposure to respirable crystalline silica and the specific measures defined in this section we have implemented to protect our employees.

The use of specific tools that are equipped with water infiltration systems and/or vacuum dust collecting systems.

The purpose and description of the medical surveillance program within the OSHA Standard.

We will also make a copy of the OSHA Standard readily available without cost to each employee covered by this section.

Training will be performed at time of project/site orientations, new hire, if any changes are made within the work place that may affect this program and on a periodic basis including but not limited to "Tool-Box" talks and through notifications and bulletins.

All training performed will be documented and records of training and employee attendance will be retained on site for the duration of the project. Copies of all employee training will be sent to our main office and retained for at least 7 years after project completion.



Section 22: Written Exposure Control Plan for Respirable Crystalline Silica Dust

RISK CONTROL

TABLE 1 EXPOSURE RESULTS			
EMPLOYEE / OPERATION	Respirable Particulates (mg/m³)	Respirable Quartz (mg/m³)	
November 2 nd , 2017			
Henry Rosario / Drywall Finishing (A1)	0.54	0.012	
Ambient Air Sample (B1)	0.33	0.012	
Ambient Air Sample (C1)	0.31	< 0.0085	
November 3 rd , 2017			
Ambient Air Sample (A2)	0.37	< 0.0085	
Ambient Air Sample (B2)	0.53	< 0.0080	
Henry Rosario / Drywall Finishing (C2)	0.68	0.0081	
OSHA PEL	5	0.05	
OSHA Action Level		0.025	
ACGIH TLV	3	0.025	

- 1. See Appendix A for Glossary of table notes and definitions.
- 2. See included Laboratory Report.
- 3. See included Data Sheet.

We appreciate your business and the opportunity to help you reduce exposures and minimize loss. If you have questions regarding our discussions or the content of this report, or if I can be of further assistance, please contact me. Thank you for choosing Travelers.

2

Sincerely,

Cydney Green

Cydney Green Risk Control – IH Group

Reviewed By:

David J. Anderson, CIH

Technical Director - IH Specialist Group



Section 22: Written Exposure Control Plan for Respirable Crystalline Silica Dust

DAY 1 RESPIRABLE SILICA AIR SAMPLING Handheld Drywall Pole Sanders with Integrated VDC









Section 22: Written Exposure Control Plan for Respirable Crystalline Silica Dust

DAY 2 RESPIRABLE SILICA AIR SAMPLING Dry Sanding of Taped Seams









Island Acoustics will:

- Pre-screen all employees upon entering worksite
- The temperatures of all employees will be taken onsite every morning before shift and in the afternoon post-lunch.
 - If an elevated temperature is detected at any time the employee will be sent home and directed to seek medical advice.
 - Individuals who have symptoms of acute respiratory illness are required to stay home and not come to work until they are free of fever (100.4° F [37.8° C] or greater using an oral thermometer), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants).
 - Individuals should notify their supervisor and stay home if they are sick.
 - Employees that have tested positive for COVID-19 cannot return to any jobsite without medical validation stating they are clear to return and have tested negative.
- Regularly monitor ourselves for elevated temperature & symptoms and not come to work or go home if they exist
- Wear PPE provided
- Practice Social Distancing as work duties permit and maintain 6' feet whenever possible.
- If any task requires more than one person to complete, you must wear additional PPE, such as:
 - Safety glasses
 - Hard hat
 - Face mask
- Work with General Contractors to ensure that they are cleaning and disinfecting work spaces
- No tool sharing
- Clean and disinfect our tools and equipment routinely
- Review and follow all additional COVID-19 Best Practices as they become available www.CDC.gov
- Continue to educate ourselves and monitor all information available on a daily basis
- Use the stairs as often as possible, and avoid using crowded elevators or hoist runs.
- Suspend all coffee orders on site, the handling of food and money should be avoided.
- Coffee breaks and lunch shall take place at individual's work area to avoid co-mingling and unnecessary contact with between workers.
- If you are experiencing any symptoms of illness you need to stay at home, contact your foreman and Debra Dale in the office (<u>dd@island-acoustics.com</u>) (631)234-4500 ext. 286 who will explain some options that maybe available to you.

Your safety is paramount and we will do everything within our power to maintain it as we navigate through this very fluid situation.



Information contained in this section has been obtained from the US Dept. of Labor/OSHA, CDC and WHO (World Health Org.) as of March 16, 2020. Websites provided in this section may contain newer and should be reviewed for current standards.

https://www.osha.gov/SLTC/covid-19/index.html

https://www.cdc.gov/coronavirus/2019-ncov/index.html

https://www.who.int/emergencies/diseases/novel-coronavirus-2019

CORONAVIRUS - (COVID-19): Protect Yourself

Clean your hands often

- Wash your hands often with soap and water for at least 20 seconds especially after you have been in a public place or after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
- Avoid touching your eyes, nose, and mouth with unwashed hands.

Avoid close contact

- Avoid close contact with people who are sick
- Put distance between yourself and other people if COVID-19 is spreading in your community. This is especially important for people who are at higher risk of getting very sick.

Take steps to protect others

- Individuals who have symptoms of acute respiratory illness are required to stay home and not come to work until they are free of fever (100.4° F [37.8° C] or greater using an oral thermometer), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants).
- Individuals should notify their supervisor and stay home if they are sick.
- Employees that have tested positive for COVID-19 cannot return to any jobsite without medical validation stating they are clear to return and have tested negative.

Cover coughs and sneezes

- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Throw used tissues in the trash.
- Immediately wash your hands with soap and water for at least 20 seconds. If soap and water are not readily available, clean your hands with a hand sanitizer that contains at least 60% alcohol.



Wear a facemask if you are sick

- If you are sick: You should wear a facemask when you are around other people (e.g., sharing a room or vehicle) and before you enter a healthcare provider's office. If you are not able to wear a facemask (for example, because it causes trouble breathing), then you should do your best to cover your coughs and sneezes, and people who are caring for you should wear a facemask if they enter your room.
- If you are NOT sick: You do not need to wear a facemask unless you are caring for someone who is sick (and they are not able to wear a facemask). Facemasks may be in short supply and they should be saved for caregivers.

Clean and disinfect

- Clean AND disinfect frequently touched surfaces daily. This includes tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, and sinks.
- If surfaces are dirty, clean them: Use detergent or soap and water prior to disinfection.

Separate construction workers from occupied building workers. To reduce exposure to possibly exposed or infected persons, implement procedures for minimizing contact between workers that don't usually work together. Some policies may include separate bathroom facilities, isolating workers lunch and break areas, and limiting interactions with building employees.

Disinfect high traffic areas frequently. For areas of high use, use disinfectants to keep areas clean. Job trailer doors and stair rails, meeting tables, and coffee stations should all be frequently cleaned using a bleach-based cleaner.

Be defensive during interactions with others. During this period of uncertainty, monitor yourself and others and pay special attention to limit social contact with others. Train yourself to not cross-contaminate or to touch your face. Share respect, not potentially harmful germs.

Implementing these measures on your jobsite may help reduce the spread of exposure to the coronavirus. Taking these actions will also reinforce to workers that measures are being taken to ensure their safety. We need to work together to reduce opportunities of exposure for all workers.

Know The Facts

What are the symptoms of COVID-19?

• Symptoms for COVID-19 include fever/chills and shortness of breath, cough or sore throat.

How does COVID-19 spread?

• COVID-19 is thought to spread mainly from person to person through coughing or sneezing.



It may also be spread when people touch something with the virus on it then touch their mouth or nose. Symptoms usually appear 7-14 days after exposure.

Who is at higher risk for COVID-19 complications?

• Pregnant women, and children or adults with underlying conditions such as asthma, diabetes, suppressed immune systems, heart disease, and kidney disease, are more likely to have complications

How severe is illness associated with COVID-19?

• Illness has ranged from mild to severe. Most people have recovered without needing medical treatment. However, hospitalizations and deaths have occurred

How do I protect myself?

Practice good hygiene!

- Avoid close contact with people who are sick.
- Avoid touching your eyes, nose and mouth.
- Stay home when you are sick.
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
- Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.
- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing, or sneezing. If soap and water are not readily available, use an alcohol-based hand sanitizer with at least 60% alcohol.

Always wash hands with soap and water if hands are visibly dirty.

What is a Coronavirus?

Coronaviruses are a family of viruses that can cause respiratory illness in people. Coronaviruses circulate among animals, including camels, cattle, cats, and bats.

How is the Novel Coronavirus, COVID-19 Different from Other Coronaviruses?

Just like there are different types of related viruses that cause smallpox, chickenpox, and monkey pox, different coronaviruses cause different diseases in people. The Severe Acute Respiratory Syndrome (SARS) coronavirus causes SARS and the Middle East Respiratory Syndrome (MERS) coronavirus causes MERS. The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

What are the Signs and Symptoms of COVID-19 infection?

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath.

What Should I Do if I Think I Have Been Exposed to or Infected with COVID-19?



Alert your healthcare provider immediately if you think you may be infected with COVID-19, including if you have been exposed to someone with the virus and have signs/symptoms of infection. If you are experiencing symptoms, you should tell your healthcare provider about any recent travel to areas where COVID-19 is spreading. If you believe you have been exposed on the job, alert your supervisor or occupational health clinic immediately.

How is COVID-19 Diagnosed?

Your healthcare provider can determine if your signs and symptoms are explained by other causes, or if there is reason to suspect you may have COVID-19. If laboratory testing is appropriate, your healthcare provider will work with health officials in your state, who in turn will work with CDC, to collect and test any clinical specimens for diagnosis.

How is COVID-19 Treated?

No vaccine or specific treatment for COVID-19 infection is available. Hospitals can provide supportive care for infected people. There is currently no vaccine to prevent coronavirus disease 2019 (COVID-19). The best way to prevent illness is to avoid being exposed to this virus. The following is from the Centers for Disease Control and Prevention.

The virus is thought to spread mainly from person-to-person:

- Between people who are in close contact with one another (within about 6 feet).
- Through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. Older adults and people who have severe underlying chronic medical conditions like heart or lung disease or diabetes seem to be at higher risk for developing more serious complications from COVID-19 illness.

Additional References:

https://covid19vaccine.health.ny.gov/what-you-need-know https://www.cdc.gov/



ISLAND ACOUSTICS, LLC Section 24: Sub-Contractor Safety Policy

It is the responsibility of management to provide sub-contractors with information about any hazardous substance or condition that they may come in contact with or that they may be exposed to on site. They should be provided with a copy of Island Acoustics' safety rules and regulations and be made aware of any precautions or protective measures they must take to perform work at Island Acoustics.

Sub-Contractors will provide Island Acoustics with proof of insurance and a copy of their Safety Plan.

All sub-contractors, delivery personnel or any outside workers must meet at least all the standards of Island Acoustics regardless of their own company policy.

All sub-contractors must show proof of insurance prior to starting any work at an Island Acoustics job site. Sub-contractors must meet the following standards:

- Advise Island Acoustics management of all hazards or chemicals that they bring on Island Acoustics' sites.
- Must have on site all SDS for any materials they bring on site.
- Will become familiar with Island Acoustics safety plan and abide by our rules as stipulated in the Goals, Objectives and Responsibility Section of our Manual.
- Abide by all safety rules for the job site.
- Provide Island Acoustics with at least one competent person who will be responsible for their company's safety program.
- Maintain their safety records on site.
- Perform employee training for their employees.
- Report any unsafe acts or conditions to the Island Acoustics foreman.

If sub-contractors do not follow our rules and policies they will no longer work on Island Acoustics projects. Island Acoustics will inform all subcontractors of unsafe acts or conditions in writing and request correction.



A. The safety statement and objectives

The *Island Acoustics LLC*. Loss Prevention Program is based on the premise that every employee is entitled to a safe and healthful work environment. Our Loss Prevention Program is designed specifically for the protection of our employees and visitors. Management and all employees are directed to make safety and loss prevention a top priority.

We believe every employee is concerned for his or her own safety and the safety of coworkers and will recognize that these rules and policies are for their protection. The goals we have set for our Loss Prevention Program are achieved through a cooperative effort among all employees and management. Safe work habits and the awareness and knowledge of all safety rules and policies are a condition of your employment at Island Acoustics, LLC. All employees are required to attend training to become familiar with rules and policies and to abide by them. These rules and policies will be enforced just as any other company policy. Failure to comply can result in reprimand, suspension or employment termination.

All employees are encouraged to make suggestions that will assist in maintaining safe work conditions and should bring these suggestions to their supervisor's attention. It is through our joint participation that accidents can be prevented, but only you can make safe work practices a habit.

Accidents cause pain and suffering, wasted time and money, and can cost someone his or her life. Island Acoustics, LLC. is committed to providing you with a safe place to work. We require your assistance and participation in keeping it that way. We will never ask you to commit an unsafe act or violate a safety rule. We expect the same from you.

Our policy toward safety is in no way limited to the rules that follow. All unsafe practices, whether listed here or not, will be addressed.



Date: 7/1/21



Company safety goals and objectives

Island Acoustics, LLC. is committed to providing its employees with a safe and healthful working environment. To achieve this environment the company has established the following goals, objectives and tactics:

Goals

- 1. Annually reduce employee accidents and injuries until they stand at or near zero.
- 2. Help develop safe work habits and attitudes among employees.
- 3. Provide a channel of communication between employees and management.

Objectives

1. Establish a Loss Prevention Program that will reduce the number of injuries and accidents to a minimum, not merely keeping with, but surpassing the best experience of other operations similar to ours.

Tactics

- 1. Review past injuries quarterly for trends and causes of accidents.
- 2. Review our Loss Prevention Program annually to meet the current safety needs of the company.
- 3. Provide supervisors and employees with safety training in the following areas: OSHA 1926.502 Fall Prevention Training, Hazardous Material Training and also using weekly Tool Box Talks designed to heighten employee of workplace hazards and OSHA safety regulations.

Safety responsibilities

All responsibilities should be clearly communicated and understood. No person should be held responsible for performing a function unless that person also has the authority to accomplish it.

At *Island Acoustics, LLC*. Safety responsibilities are assigned to the all employees. Everyone is responsible for safety in the workplace.

President responsibilities

Management accepts the responsibility for impressing upon all employees that safety and injury prevention have a high priority at *Island Acoustics*, *LLC*. and that all rules and policies will be followed.

- 1. Provides leadership and guidance to middle management for the acceptance, maintenance and enforcement of the Loss Prevention Program.
- 2. Provides resources for training and monitoring the Loss Prevention Program.
- 3. Periodically reviews the safety records and reporting functions.
- 4. Promotes and attends safety functions.



- 5. Maintains open lines of communication between employees, supervisors and management relative to the free exchange of safety suggestions and information.
- 6. Monitors the follow-up on recommendations made to improve performance and prevent accidents.

Safety coordinator responsibilities

At *Island Acoustics*, *LLC*. the primary responsibility for the Loss Prevention Program rests with the safety coordinator. He or she is responsible for the daily maintenance of the Loss Prevention Program and provides leadership_to the foreman, supervisors and Project Managers in their daily functions related to safety.

- 1. Works closely with all company operations and insurance carrier representative to ensure that safety compliance interfaces with operating procedures, and that safe work methods are established and maintained as policy.
- 2. Establishes and implements all necessary employee safety training and develops controls that ensure that safe procedures are followed.
- 3. Makes periodic inspections of all areas of the organization to identify safety hazards. Takes action to correct all unsafe conditions or practices.
- 4. Ensures compliance with all company, local, state and federal safety regulations.
- 5. Enforces safety procedures for interviewing, testing, investigating, hiring and orientation of new employees.
- 6. Complies with proper procedures for accident investigation and reporting.
- 7. Reviews job safety inspection forms with supervisors and schedules job tasks to be reviewed.

Manager responsibilities

The manager is responsible for translating top management's policies into action and for promoting safety activities among employees. He or she provides leadership for his employees in their daily functions related to safety and production.

- 1. Periodically inspects all areas to identify safety hazards and takes action to correct all unsafe conditions or practices.
- 2. Ensures compliance with all company, local, state and federal safety regulations.
- 3. Assists in establishing procedures for interviewing, testing, investigating, hiring and orienting new employees



- 4. Orients new employees to safe job procedures, job assignments, job requirements and all rules related to their job.
- 5. Trains employees involved in accidents and those whose performance or actions make additional training necessary.
- 6. Enforces the use of required personal protective equipment.

Supervisor/Foreman responsibilities

Supervisors/Foreman are key in the success of our Loss Prevention Program. Their responsibilities must be met on a daily basis and with a high degree of proficiency. They must be able to communicate and enforce all safety policies and procedures. All employees must feel confident that the supervisor cares about their personal safety.

- 1. Orients new employees to safe job procedures, job assignments, job requirements and all rules related to their job.
- 2. Reports any unsafe conditions or equipment and follows up to ensure that any defective equipment or unsafe conditions are corrected.
- 3. Brings forth information on all accidents and incidents, and assists in determining steps to prevent recurrence.
- 4. Reviews the daily activities of each employee and assists the jobsite team in enforcing the Loss Prevention Program and all safety rules.
- 5. Maintains satisfactory standards of housekeeping throughout the organization.
- 6. Knows how to operate all emergency equipment in his or her areas of responsibility.
- 7. Enforces the use of required personal protective equipment.
- 8. Thoroughly investigates all accidents and injuries, and files all necessary reports in a timely manner.
- 9. Retrains or instructs employees involved in accidents and those whose performance make additional training necessary.
- 10. Makes periodic inspections of all areas of the organization to identify safety hazards. Acts to correct all unsafe conditions or behaviors.
- 11. Performs job safety inspections by establishing methods, and files necessary reports in a timely manner.

Employee responsibility

We want Island Acoustics, *LLC*. employees to be the safest, most knowledgeable and most conscientious employees in our industry. To develop and maintain this professional image, our management must provide all employees with proper training. *Island Acoustics, LLC*. employees must:

- 1. Understand all safety rules and policies and work in such a manner that abides by these rules.
- 2. Maintain the physical and mental standards necessary for the job.



Daily inspect his or her assigned work area and equipment and immediately report any unsafe conditions.

- 3. Immediately report all accidents or near accidents involving property damage or injuries, regardless of who was at fault.
- 4. Become familiar with and abide by all local, state and federal regulations that apply to his or her job activity.
- 5. Attend all required safety meetings.
- 6. Help extend the life of equipment through proper operation and avoidance of abuse.
- 7. Be familiar with the proper maintenance of required personal protective equipment and use it.

B. Work standards and rules

All *Island Acoustics*, *LLC*. employees are expected to be familiar with and abide by all the following rules. Our policy toward safety is in no way limited to the rules that follow and all unsafe practices, whether listed here or not, will be addressed. Failure to comply with any safety rule will be cause for disciplinary action and can lead to reprimand or termination.

- 1. Always report any injuries or accidents to Supervisor/Foreman & Safety Admin in office. Know where first aid facilities are located. All injuries should be treated at once.
- 2. All employees must wear personal protective equipment such as hard hats, hearing protection, eye protection, high visibility clothing and others when in designated areas that require such protection. Appropriate footwear is required.
- 3. Do not remove safety guards from any saw, machine or hand tool. Do not operate any saw, machine or hand tool without a safety guard.
- 4. Practical jokes and horseplay can lead to accidents and will not be tolerated. Never distract another employee.
- 5. Obey all warning tags and signs posted throughout the workplace or affixed to machinery or hand tools.
- 6. Be careful when lifting or pushing heavy objects. Avoid unnecessary back injuries by following rules of common sense:
 - Keep neutral curve in low back.
 - Keep head up.
 - Lift with legs.
 - Bring load in close.
- 7. Know where a fire extinguisher is located and how to properly operate it. Do not play with fire extinguishers.
- 8. Keep all areas neat, orderly and free from trash and debris.

9.



- 10. Check the condition of all personal protection equipment, machinery and extension cords daily. Never remove ground wires from electrical tools. Never attempt to make electrical repairs.
- 11. Smoking is allowed on any construction job site.
- 12. Possessing, using, selling or being under the influence of alcohol, marijuana, hallucinogens or any other drugs or controlled substances on company projects at any time or when on company time away from the workplace is strictly prohibited and could result in immediate termination of employment.

C. Enforcement procedures

Responsibilities do not stop with the management. Employees are responsible to obey all company rules and to work in such a manner that will prevent injury to themselves or fellow employees.

The Company's intent is not to discipline employees who are involved in non-preventable accidents. *Island Acoustics, LLC*. position is to work with those employees to make them safer workers. Disciplinary procedures are established to deal with any employees who disregard company policies and rules, or who are repeatedly negligent in their duties. Our procedures are set up to first warn, then if properly communicated warnings are not heeded, to discipline problem employees. *Island Acoustics, LLC*. cannot and will not permit negligent people to repeatedly injure themselves or to put their fellow employees in danger.

Should there be a violation of safety rules or policies, the following disciplinary procedures will apply:

- 1. **Verbal warning**: Employee will be given a verbal warning for a minor offense. A record of this warning will be placed in employee's personnel file.
- 2. **Written warning**: Employee will be given a written warning for relatively serious or repeat offenses. Copies of the written warning are filed in the employee's personnel files.
- 3. **Termination of employment**: Employee may be terminated for flagrant violations of company policies and procedures. Termination may also occur if employee persists in continued or repeated violations of company rules after repeated warnings and continues at an unacceptable level of performance.

D. Employee training

The training of supervisors and other employees is vital in a successful Loss Prevention Program. *Island Acoustics, LLC.* management provides training to all supervisors and supports their training of all other employees. Employee training is the responsibility of the Safety & Project Managers.

Safety training is not a one-time occurrence. Continual monitoring and interaction between employees and supervisors demonstrate accident prevention efforts.

Safety rules and safe work procedures should be discussed specifically with each employee on an ongoing basis. Work routines should be reviewed periodically. Employees should be given explanations of potential hazards to avoid and safeguards to follow. Discussions should include a review of safety



procedures, along with an explanation of why Safety Manager/Foreman/Super/PM feels they are necessary.

Safety training should include the following topics:

Fall Prevention – 1926.502 Tool Box Talks

OSHA Training Travelers Insurance Safety Classes

Drug & Alcohol Awareness PPE Training
Hazardous Material Training Site Safety Plans

Pre Task Safety Meetings Construction Work Plans

It may become necessary to retrain employees in safety rules or procedures.

It is vital to our Loss Prevention Program that all safety training programs and meetings be carefully documented. Written/Electronic records of all training activities are the responsibility of the Safety Administrator.

E. Worksite review and inspections

Job safety review and inspection is a process for identifying hazards and developing safe job procedures. Island Acoustics, LLC. is committed to providing a safe and healthful environment for its employees. Part of providing this environment involves uncovering potential hazards in the workplace. These hazards may have been overlooked in the layout of the building or the design of equipment; been developed after production started, or resulted from changes in work procedures or personnel.

The four basic steps in doing a job safety review and inspection are:

- 1. Select the job to be reviewed. Selecting jobs to be reviewed should be based on frequency of accidents, injury severity, potential injury severity and whether the job is newly established.
- 2. Break the job down into successive steps or actions and observe how they are performed.
- 3. Identify the hazards or potential accidents. Look for accident types—what can the employee be struck by, caught on, contacted by, etc.?
- 4. Develop solutions for potential accidents. This may include writing a standard operating procedure, finding a new way to do the task, changing physical conditions or reducing the number of times the task has to be performed.

The major benefits of job safety reviews come after completion. Safety attitude and awareness among employees is improved. The analysis can also be used for initial job safety training and as pre-job safety instructional tools. Properly used, job safety review and inspections can reduce accident frequency and severity.

All reviews and inspections will be documented for follow-up in the future to determine if recommendations have been implemented.



F. Reporting process and accident Investigation

The management at Island Acoustics, LLC. accepts the responsibility for minimizing losses due to unsafe practices by promptly and accurately investigating all accidents whether an injury occurs or not.

Accident investigation is a vital part of our Loss Prevention program and is designed to prevent or control unsafe practices. The information obtained in a thorough investigation will assist in determining when an accident occurred and then give a basis for taking corrective action. The investigation must include a written report.

Accident investigation procedure

An investigation should always be done as soon after the accident as possible. Facts should be gathered and statements taken while the accident is still fresh in the minds of those involved. If possible, every employee who is involved or who witnessed the incident should be interviewed. All possible causes should be studied and accurate details should be obtained. The accident investigator should interview witnesses separately and caution should be used in jumping to hasty conclusions.

Preparing a written report

All possible questions related to the accident must be answered and corrective actions must be recommended.

- 1. *Personnel and background information.* Name of the person involved in the accident. What are the employee's regular job tasks? What are the nature of the injuries and the injured body parts?
- 2. Accident description and related information. Give the exact location of the accident. What was the job task the injured was doing at the time? What was the exact step or part of the job being done? What type of accident occurred?
- 3. *Analysis of accident causes.* What did the injured employee do or fail to do that contributed directly to the accident? What defective or otherwise unsafe condition of tools, equipment, machinery, structures or work contributed directly to the accident? What was the primary type of unsafe action or condition involved?
- 4. *Actions to prevent accident recurrence.* Indicate actions needed to prevent recurrence. Identify persons responsible for planned corrective actions.
- 5. *Miscellaneous information*. When was the last job hazard analysis of the job conducted? Who investigated the accident?

Reporting procedures

All accidents must be reported to a supervisor as soon as possible. If an employee is injured, be sure to get the injured employee the necessary medical attention first. Then, the Safety Admin is responsible to report the injury to our workers' compensation provider as soon as possible to be sure the claim is processed as efficiently as possible.



ISLAND ACOUSTICS

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Safety Administrator

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