# INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

# SAFETY PROGRAM, PROCEDURES & PLANS

# CODE OF SAFE PRACTICES

KODIAK UNION

ONE TEAM. ONE GOAL. HOME SAFE.

## Prepared and Submitted By:

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**916-253-1900**

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# Table of Contents

# I. KODIAK'S COMMITMENT TO SAFETY

## Message from the President

The Occupational Safety and Health Act of 1970 clearly states that the goal of safe and healthful working conditions is the first consideration in operating a business. Kodiak Roofing & Waterproofing Co. shares this goal.

Safety and health in our business must be a part of every operation. Without questions, it is every employee's responsibility at all levels.

It is the intent of Kodiak to meet and exceed all Federal and State requirements and standards. To do this, we must constantly be aware of conditions in all work area that can produce injuries. No employee is required to work on a job that he or she knows is unsafe or free of health hazards. Your cooperation in detecting hazards, and in turn, controlling them is a condition of your employment. Inform your supervisor immediately of any situation that is unsafe and beyond your ability and authority to correct.

The personal safety and health of every Kodiak employee is of primary importance. The prevention of occupational-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 safety and health in keeping with the highest standards.

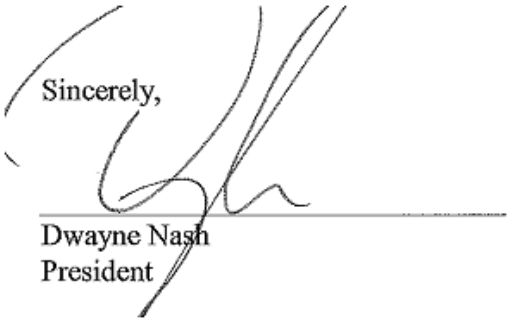
We will maintain a safety and health program conforming to the best practices of organizations of this type. This program must embody the proper attitudes toward injury and illness prevention on the part of both supervisors and employees to be successful. It also requires cooperation in all safety and health matters, not only between supervisors and employees, but also between employees' fellow workers. To this end, the Kodiak Health and Safety Advisory Committee, comprised of management and non-management has been established. Only through such a cooperative effort can a safety record in the best interest of all be established and preserved.

Our goal is to send every employee home in the exact same condition they arrived each day. Our expectation is zero on the job injuries and illnesses. Our health and safety program includes:

- Providing mechanical and/or physical safeguards to the maximum extent possible.
- Conducting safety and health inspections to identify and control health and safety hazards and unsafe conditions and practices.
- Continually training all employees in hazard recognition and elimination.
- Ensuring all employees are equipped with and know how to properly use and maintain the appropriate Personal Protective Equipment.
- Developing and enforcing the health and safety policies and procedures.
- Ongoing enforcement of safety policies and procedures.
- Prompt and thorough investigations of accident, injury or near miss to determine the root cause and develop a plan to prevent re-occurrence.

We recognize that the responsibilities for safety and health are shared:

- Kodiak accepts the responsibilities for leadership and overseeing implementation of the company's Injury and Illness Prevention Program (IIPP).
- The Health and Safety Advisory Committee is responsible for continually evaluating the effectiveness of the IIPP and compliance with OSHA requirements.
- The Safety Director is tasked with inspiring safe behavior, leading the Kodiak Health and Safety Advisory Committee, ensuring that employees receive training on the hazards and safety procedures associated with their duties and ensuring compliance with all applicable Health and Safety Regulations.
- Supervisors are responsible for leading by example, developing and maintaining the proper attitude toward safety in those they supervise, ensuring that all operations are performed with the utmost regard for the health and safety of all.
- Employees are responsible for wholehearted and genuine compliance with all aspects of Kodiak's safety initiatives and compliance with OSHA requirements in all aspects of the performance of their duties.



# II. INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

## A. Responsibility

David Nash (916)253-1909 the Safety Director for all Kodiak Entities, has the authority and responsibility for implementing the provisions of The Injury and Illness Prevention Program (IIPP) and Code of Safe Work Practices Program. Mr. Nash along with his safety staff and the Kodiak Health and Safety Advisory Committee will continuously review Company safety practices and bear an equal responsibility in seeing that the proper safety precautions are designed and implemented.

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

## B. Compliance

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

Our system of ensuring that all workers comply with these practices to maintain a safe work environment include,

- Informing workers of provisions of our IIPP and Safety Program;
- Evaluating the safety performance of all workers;
- Recognizing employees who perform safe and healthful work practices;
- Providing Training to all new hires and existing employees on safe work practices as well as hazard recognition and mitigation of safety hazards.
- Providing Retraining to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices.
- Providing regular safety meetings that target areas of importance to our industry.

## C. Communication

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of one or more of the following eight items:

- New worker's orientation including a discussion of safety and health policies and procedures.
- Review of our IIPP and Safety Program.
- Workplace safety and health training programs.
- Regularly scheduled safety meetings.
- Effective communication of safety and health concerns between workers and supervisors

Including translation where appropriate:

- Posted or distributed safety information.
- A system for workers to anonymously inform management about workplace hazards.
- A labor/management health and safety advisory committee that meets regularly, prepares written records of meetings, review results of the periodic scheduled inspections, reviews investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents, reviews investigations of alleged hazardous conditions, and submits recommendations to assist in the evaluation of worker safety suggestion.

## D. Hazard Assessment

Prior to the start of each new project, a job-handoff is performed consisting of the estimator, project manager, VPO, superintendent and a member of the Kodiak safety team to review the scope of work to be performed as well as potential safety hazards and recommended controls. Prior to the project start, a Risk Assessment shall be conducted to determine the frequency of exposures to hazards and the potential outcome of an incident occurring from hazards present on each jobsite. A Site-Specific Safety Plan shall be developed by a member of the Kodiak safety team for each project location to identify and mitigate potential safety hazards prior to the commencement of work. Additionally, a site visit by the superintendent assigned to this project and/or a member of the Kodiak Safety Team is performed to evaluate potential hazards of job sites that are identified in the job hand-off as high hazard. Each person assigned to a Kodiak jobsite, including sub-contractors, shall participate in conducting and completing a daily Job Hazard Analysis (JHA) which shall list the job tasks to be performed, identify hazards and the controls necessary to mitigate the identified hazards. Copies of JHA's shall be submitted to the Kodiak Safety Team for review on a weekly basis.

Periodic planned and random inspections to identify and evaluate workplace hazards shall be performed by management, supervisory personnel and members of the Kodiak Safety Team in the following locations of our workplace:

| **GENERAL OFFICES & WAREHOUSE:** | **NEVADA OFFICE & WAREHOUSE** |
|---|---|
| 8825 Washington Blvd. #100<br>Roseville, California 95678 | 1890 Purina Way<br>Sparks, Nevada 89431 |

### Kodiak Staffed Job Sites/Projects

Periodic inspections are performed according to the following schedule:

- Daily;
- Quarterly;
- When management and/or supervisory personnel visit job-sites;
- When a member of the Kodiak Safety Team performs random job-site visits
- When we initially established our IIPP and Safety Program;
- When new substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace;
- When new, previously unidentified hazards are recognized;

- When occupational injuries and/or illness occur;
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable Sections of the hazard assessment checklist and any other effective methods to identify and evaluate workplace hazards.

## Hazard Classification

Hazards shall be classified and ranked according to the risk that they pose. The following Risk Assessment Rating table shall be used to assist in the classification and ranking of each hazard based upon the frequency that employees are exposed to the hazard and the severity of the outcome if an incident occurs in the workplace.

| 0 – 5 = Low Risk<br>6 – 10 = Moderate Risk<br>11 – 15 = High Risk<br>16 – 25 = Unacceptable Risk | | RISK ASSESSMENT RATING (RAR)<br>Severity of Potential Consequences | | | | |
|---|---|---|---|---|---|---|
| | | Insignificant – 1 | Minor – 2 | Moderate – 3 | Major – 4 | Catastrophic – 5 |
| Likelihood of Occurrence | Rare – 1 | 1 | 2 | 3 | 4 | 5 |
| | Unlikely – 2 | 2 | 4 | 6 | 8 | 10 |
| | Occasional – 3 | 3 | 6 | 9 | 12 | 15 |
| | Likely – 4 | 4 | 8 | 12 | 16 | 20 |
| | Almost Certain – 5 | 5 | 10 | 15 | 20 | 25 |

## Hierarchy of Controls

Once a Risk Assessment has been performed, steps shall be taken to eliminate any hazards that have a high risk or unacceptable risk score using the hierarchy of controls which consist of the following steps:

- **Elimination** - or removal of the hazard
- **Substitution** - with a less hazardous process, practice or condition.
- **Engineering Controls** – Isolation or enclosure of hazardous condition.
- **Administrative Controls** – Improving the way work is done (minimize exposure through time limits, employee substitution etc.)
- **PPE** – Personal Protective Equipment (Last Line of Defense)

Using the hierarchy of controls, steps shall be taken to ensure that hazards are reduced to an acceptable level that will ensure the safety of all Kodiak personnel on each jobsite.

# E. Accident/Exposure Reporting and Investigation

Kodiak is committed to providing all employees and visitors to our projects an injury free work environment.

**Purpose:** The following procedures have been established to standardize the Kodiak Accident/Injury reporting procedures to:

- ensure injured Kodiak employees receive appropriate medical attention
- report all accidents, injuries and infectious diseases in a timely and consistent manner to the Kodiak Safety Director and/or Human Resources
- ensure that the proper corrective action takes place to prevent further occurrences
- facilitate the timely reporting to the Kodiak Workers Compensation provider
- ensure compliance with OSHA reporting rules and regulations
- ensure the integrity and reputation of Kodiak, its employees and vendors are protected
- Tools for conducting a thorough investigation shall be provided to assist investigators in the process of determining the root cause of the accident/incident. These tools shall include but are not limited to: a camera, measuring tape, barricades/tape, warning tags, Form IIPP-5, Pen etc.

**Scope:** All accidents or incidents that result in injury, illness or potential infections to Kodiak employees or damage to property must be reported to management at Kodiak's main office within 24 hours. The employee and Kodiak management (Foreman, Supervisors, PM's, Human Resources and Safety Director) are responsible for ensuring that the elements in these procedures are followed consistently after incidents and injuries occur. Kodiak management shall receive periodic re-training in accident/incident investigation procedures.

The type of incident/injury will determine what procedures must be followed.

- Near miss
- Minor Injuries (First Aid Only)
- Serious Injuries (Other than First Aid)
- Fatality

After an incident or injury occurs the Kodiak foreman or other Kodiak employee will administer appropriate first aid to the injured employee. The foreman will contact Onsite Health and Safety to arrange for an onsite visit by a trained medical technician who will administer first aid and determine whether advanced medical treatment should be provided. In the case of severe or life-threatening injuries, the foreman will call 911.

### Near Miss

Incidents that do not result in injury to an employee require that the employee(s) involved fill out form IIPP-8 and submit it to a member of the Kodiak safety team within 24 hours of the near miss incident. A member of the Kodiak Safety Team will conduct follow-up investigations using Forms IIPP-5 (parts 3 & 4).

## Minor Injuries (First Aid Only)

Minor injuries are defined as those which require only immediate First Aid treatment and do not result in work restrictions or lost time. All injuries no matter how minor **must** be reported to Kodiak's Safety Director within 24 hours of the incident/accident.

When an injury occurs, the foreman/supervisor shall call Onsite Health and Safety @ 1-866-998-2750 to arrange for an onsite visit by a trained medical technician. If it is determined that further medical attention is needed, the injured employee shall be taken to the designated medical facility noted in the foreman's pack. The treating physician/practitioner will establish when an injury is to be classified as First Aid Only. The injured employee shall fill out forms IIPP-5 (parts 1 and 2) and IIPP-5.5 as needed. The Kodiak supervisor onsite shall identify and ensure that evidence from the accident incident be collected, secured and preserved to aid in the investigation. The Kodiak Foreman and a member of the Kodiak Safety Team will conduct an Accident/Incident investigation using Forms IIPP-5 (parts 3 and 4).

## Serious Injuries (Other Than First Aid)

Serious injuries are those that require emergency medical treatment resulting in restricted duty or lost time. The following steps shall be taken in the case of an accident involving serious injuries:

- The first person that encounters the injured person shall summon the Kodiak foreman.
- The foreman will notify a member of the Kodiak Safety Team within 1 hour of the Incident/Accident.
- Appropriate First Aid will be administered by those certified in First Aid/CPR.
- The injured employee shall not be moved unless they are in immediate danger of additional injury in their current location.
- Do not disturb equipment, tools or materials involved in the accident unless they present an immediate hazard to the injured or first responders.
- If the incident/Accident is a vehicle accident on public roads, emergency personnel shall be contacted.
- Kodiak employees are to follow the directions of any responding emergency personnel.
- The Kodiak Safety Director shall notify Human Resources ASAP to begin the W/C reporting process
- The designated medical provider will be contacted by a member of the Kodiak Safety Team and/or Human Resources to request that a post-accident drug and alcohol screen be performed and to coordinate reporting requirements.
- The injured Kodiak employee will fill out forms IIPP-5 (parts 1 and 2) and IIPP-5.5 as soon as they are able.
- The Kodiak foreman will fill out forms IIPP-5 (parts 3 and 4) and will investigate the causes of the Incident/Accident.
- All witnesses to the incident/accident shall be interviewed and statements taken and documented on forms IIPP-5.
- Human Resources will work with the treating medical facility to ensure the employee is fulfilling all post-accident follow up visits to facilitate a quick recovery and return to work.

## Fatality

Incidents/Accidents that result in a fatality require that emergency personnel respond. In the event of an accident that involves a fatality:

- Do not disturb the scene of the accident until cleared to do so by the proper authorities.
- Kodiak foreman must contact the Kodiak Safety Director or a member of the Kodiak Safety Team and Human Resources immediately
- In the event of a fatality, it must be reported to OSHA within 8 hours
- The Kodiak Foreman, Safety Director and/or a member of the Kodiak Safety Team will investigate the Incident/Accident as soon as reasonably possible utilizing forms IIPP-5 and IIPP-5.5
- Human Resources Manager shall begin the reporting process for Worker's Compensation and other applicable reporting requirements

### Additional Reporting Criteria

Employers are required to report employee fatalities, catastrophes and "severe" injuries and illness to OSHA within 8 hours. A severe injury, illness or catastrophe is defined as that which:

- Results in death
- Requires hospitalization for more than 24 hours
- Involves the loss of any member of the body
- or results in permanent disfigurement
- a "catastrophe" refers to the inpatient hospitalization (regardless of duration) of three (3) or more employees for examination or treatment resulting from an employment injury or illness caused by a workplace hazard.

### Reporting Back to Work

Employees are only allowed to report back to work after the injured employee:

- Passes the post-accident drug and alcohol test as warranted
- Completes and submits all necessary paperwork, IIPP-5 (parts 1 and 2) to the Safety Director
- Submits a Doctor's release to work (modified duty or return to Full work) to Human Resources
- Has informed Kodiak management that he/she intends to return to work
- Has been through remedial safety training applicable to the cause of the accident

**Failure to report all exposures, injuries, near miss incidents or damage to property may result in disciplinary action to be taken.**

### Investigation

In order to eliminate on the job injuries, a system of investigation and follow up are an important part of any safety program. The following investigation and analysis are to be undertaken after an accident to prevent reoccurrences.

- The Safety Director and/or a member of the Kodiak Safety Team investigates accident by reviewing employee and supervisor reports, visiting site of the accident, interviewing witnesses, affected employee and supervisor.
- The Kodiak Safety Director and/or a member of the Kodiak Safety Team fills out Accident/Incident Investigation form and determines the root cause and determines what corrective action should be taken and records this info on the forms.
- The accident and all pertinent information (witness interviews, IIPP forms, pictures etc.) are reviewed by the Kodiak Health and Safety Advisory Committee.
- The Health and Safety Advisory Committee may update policies and/or procedures as needed to prevent future occurrences.

- The Kodiak Safety Director or HR records the pertinent information on the OSHA 300 Log of work-related injuries and Illnesses as required.
- A written report detailing the findings of the investigation shall be prepared and distributed/communicated to management. This report shall address lessons learned from the accident/incident to help in preventing future occurrences.

## F. Hazard Correction

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists, which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the areas except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection.
- Employees are encouraged to identify potentially hazardous processes and/or conditions immediately to management without the fear of reprisals for doing so.
- All such actions taken and dates they are completed shall be documented on the appropriate forms. (FORM IIPP-4)

## G. Training and Instruction

An important part of this IIPP and Safety Program is regular training of personnel in safe practices. Ongoing training is provided through the following means:

- Weekly Safety/Tailgate meetings
- Monthly Foreman Safety Meetings
- Monthly safety topics assigned through Kodiak's Bridge Learning Management System LMS
- Kodiak Mentoring (Foreman mentors his crew consisting of one Journeyman & one Apprentice)
- Weekly Safety topic presentations during management meetings
- Re-training after safety violations or accidents
- Refresher training and evaluations for activities requiring certification.
- During jobsite safety inspections by the Safety Director.

Supervisors will be provided training on hazards and safe practices in the work areas under their supervision. All training will include a general review of safety and health hazards and the applicable Code of Safe Practices. Refresher training will be provided on a scheduled basis and employees will be required to attend. Safety training is mandatory and will be documented. (FORM IIPP-6, 9 &10)

All temporary, leased, full/part time employees must be trained and instructed on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP and Safety Program is first established;
- To all newly hired workers;
- To all workers given new job assignments for which training has not previously been provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard;

- To managers and supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed;
- To all workers with respect to hazards specific to each employee's job assignment.

In addition, Kodiak provides specific instruction to all workers regarding hazards unique to their job assignments. Comprehensive training programs have been developed in house or from outside training organizations. Lesson plans have been created for each topic covered to facilitate this training. The following are the basic training topics all temporary, leased, full and part time employees receive training on before work assignments are made. This training is conducted by a member of the Kodiak Safety Team, Bridge LMS or other means unless otherwise noted:

- Kodiak IIPP outline
- Kodiak's Disciplinary Action Plan
- Infectious Disease Prevention (including COVID-19)
- Electrical Safety
- Hazard Communication
- Ladder Safety
- Fall Protection
- Heat Illness Prevention
- Hazard Identification and risk assessment
- Scaffold User Awareness
- Injury Prevention
- Personal Protective Equipment
- Kodiak's Code of Safe Practices
- Fire Prevention
- General Construction Safety
- Silica Hazards Awareness
- Struck by & caught in or between

Depending upon an employee's responsibilities the following lists additional training that is provided as needed to ensure that everyone has the appropriate level of training for their assigned tasks. This list may be updated with further training topics as needed:

- Fall Protection Competent Person
- Hot Operations
- Forklift (Counterbalanced, Rough Terrain & Telehandler)
- Aerial Boom Lift (Articulated and Straight boom)
- Aerial Scissor Lift
- Crane Rigging Certification
- Crane Signal Person Certification
- Lock-out/Tag-out/Block-out
- CPR/First Aid Certification/Bloodborne Pathogens
- Respiratory Protection / Fit Testing
- OSHA 10 & 30 Hour
- Hilti (Powder Actuated Tools) Certification*
- Lead Safe Renovator Certification*

- Asbestos Removal/Remediation Certification*
- Flagger Training*
- CERTA Torch Down Certification*
- OSHA Outreach Train the Trainer *
- First Aid/CPR Instructor*
- Crane Tech Train the Trainer*
- IVES Lift Equipment Train the Trainer*
- Fall Protection Competent Person Train the Trainer*
- Scaffold Competent Person Training*

*Training provided by outside trainers and/or organizations as necessary.

Outside contractors that are hired to perform maintenances at Kodiak facilities shall be required to attend a basic safety orientation training class prior to working onsite. The type of training required shall be determined by the scope of work that is to be performed by the outside contractor. The Kodiak Safety Director shall determine the scope of work the outside contractor will be performing prior to starting said work. The training shall include at a minimum the following:

- Site familiarization
- Emergency evacuation procedures
- PPE Requirements
- Safety expectations while working at Kodiak facilities
- Other training as determined to be needed.

### Employee Access

Kodiak employees and/or their designated representatives have the right to examine and receive a copy of the current Kodiak IIIPP. This will be accomplished by:

- Providing unobstructed access through the company server and/or company website, which allows an employee to review, print, and email the current version of the Program. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.
- A current electronic copy of the IIPP will be provided to each prospective employee during the new hire onboarding process.

Kodiak will communicate the right of all Kodiak employees to access a current copy of the IIPP:

- Upon hire during new employee orientation
- Via regular electronic notifications when the IIPP and/or Code of Safe Work Practices COSP is updated

All Kodiak employees may access a current copy of the Kodiak IIPP by visiting Kodiak's company website at https://kodiakroofing.com

1. click on the Safety tab at the top of the page.
2. Scroll down to the box "Safety is Important" and,
3. Click on the "Learn More" button.

4. A “pdf” version of Kodiak’s IIPP, Safety Program, Procedures & Plans and Code of Safe Practices will open.

Additionally, Kodiak office staff employees who have been granted access to the Kodiak server (k-drive) can access a copy of the current Kodiak IIPP by:

- Clicking on the “k-drive folder”
- Click on the “DNI Operations” folder
- Click on the “Safety Director” folder
- Click on the “Safety Plans” folder
- Scroll to and select “Kodiak IIPP”

Any copy provided to Kodiak employee(s) or their designated representative need not include any of the records of the steps taken to implement and maintain the written IIP Program.

Where we have distinctly different and separate operations with distinctly separate and different IIPPs, we may limit access to the IIPP applicable to the employee requesting it.

An employee must provide written authorization to make someone their “designated representative.” A recognized or certified collective bargaining agent will be treated automatically as a designated representative for the purpose of access to the company IIPP. The written authorization must include the following information:

- The name and signature of the employee authorizing the designated representative.
- The date of the request.
- The name of the designated representative.
- The date upon which the written authorization will expire (if less than 1 year).

## H. Recordkeeping

Kodiak maintains records in accordance with OSHA regulations pertaining to employee training and certifications jobsite inspections and injury/accident investigations. Our trade (roofing) is on a designated high hazard industry list. We have taken the following steps to implement and maintain our IIPP and Safety Programs.

- Records of hazard assessment inspections, equipment inspections site safety inspections/audits including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on hazard assessment and correction investigation forms (IIPP-4, IIPP-5, IIPP-5.5, IIPP-7, IIPP-8, IIPP-12, IIPP-13). Additionally, site and equipment inspections and audits are recorded using iAuditor application software and are stored in the virtual cloud;
- Documentation of safety and health training for each worker, including the worker’s name or other identifier, training dates, type(s) of training, and training providers are recorded on a worker training and instruction form. Kodiak utilizes Bridge, a cloud-based Learning Management System LMS, and/or hands-on training depending upon topic for individual safety orientation and ongoing safety instruction. We also include records relating to worker disciplinary actions and training

provided by construction industry occupational safety and health programs approved by OSHA. (IIPP-6, IIPP–9, IIPP-10, IIPP-11).

- All work-related injury, illness, and fatality records pertaining to Kodiak employees shall be maintained by the Kodiak Safety Director for a period of at least 5 years. An annual OSHA 300 log shall be maintained which records OSHA required information regarding work-related injuries, fatalities and illnesses. All injuries, fatalities and/or illnesses must be recorded on the OSHA 300 log within 7 days of the incident becoming known to Kodiak management. An annual OSHA 300A summary shall be prepared which summarizes the information contained on the OSHA 300 log for the previous year. The OSHA 300A shall be signed by a Kodiak company official and a copy shall be posted in the employee breakroom on the employee posting board from February 1 – April 30 as required by OSHA regulations.

Inspection records and training documentation will be maintained for at least three (3) years, except for training records of employees who have worked for less than one year which are provided to the worker upon discharge or termination of employment when requested.

# III. SAFETY PROGRAM, PROCEDURES & PLANS

## A. PROGRAM ADMINISTRATOR/SAFETY DIRECTOR

The Kodiak Program Administrator (Safety Director) is David Nash. He can be reached at:

**David Nash**
**(916) 253-1909 Office**
**(916) 833-1749 Cell**
**davenash@kodiakroofing.com**

## B. HEALTH AND SAFETY ADVISORY COMMITTEE

In good faith, the Kodiak Health and Safety Advisory Committee was established on Friday, November 19, 1999 to help ensure safe operations in all aspects of our business through the promotion of workplace safety. Eight Health and Safety Advisory Committee members consisting of two (2) management, two (2) office, one (1) warehouse and three (3) field personnel are invited or assigned to serve on the committee. Committee members elect a committee co-chairperson and secretary. The chairperson (David Nash) is responsible for running meetings, setting agenda, and for maintaining close contact and information exchange with management, office, warehouse, field personnel, and committee members. The co-chairperson serves in a supportive role to the chairperson. The secretary is the record keeper and as such is responsible for keeping an accurate log of all proceedings/members present at meetings, reporting notes from previous committee meetings, ensuring that a copy of all notes/memos/committee information is filed with the Safety Director, Copies of the Health and Safety Advisory Committee minutes shall be maintained by the Safety Director. The Safety Director and/or his designates will train committee members upon appointment to the committee and as additional training and retraining is deemed appropriate.

The Health and Safety Advisory Committee's directive is to provide a forum, which will thoroughly hear, address, analyze, update, change, and enhance our safety program and its reward/discipline procedures. The Health and Safety Advisory Committee is responsible for:

- Reviewing and updating the written safety manual,
- Continually appraising and inspecting all work sites to identify safety hazards; this includes the review and evaluation of new projects and changes in work tasks, operations and
- Processes for appropriate safety measures
- The safety of all work conditions
- Training and retraining procedures for employees
- Proper use of personal protective equipment (PPE)
- The investigation of all accident, "near misses" and work-related illnesses
- Receiving and discussing recommendations to improve the safety program
- Procedural changes or updates to safety program when necessary and the general safety of all operations
- Providing safety direction to the company and its safety designates.

The committee meets quarterly or more often as situations/conditions may warrant.

## C. JOB CLASS SAFETY GROUPS

We have designated General Office, Warehouse, and Field Personnel as separate Job Class Safety Groups for the purposes of the IIPP and Safety Program. (See: Code of Safe Practices.) Additional designations will be made as necessary.

## D. JOB CLASS SAFETY GROUP HAZARD IDENTIFICATION, EVALUATION AND ELIMINATION PROCEDURES

As part of the IIPP and Safety Program, we have made job safety and health hazard identification, evaluations and elimination a requirement for each Job Class Safety Group. This is a continuing process that involves all Kodiak employees. Kodiak employees are required to identify potential and existing hazards in the workplace and eliminate them as they are identified. If the employee is unable to eliminate the hazard immediately then the existing or potential hazards should be brought to the attention of the employee's immediate supervisor and/or the Safety Director so that the hazard may be mitigated immediately. Existing or potential hazards that threaten the safety of Kodiak employees that cannot be eliminated immediately requires that all affected employees be removed from the immediate area of the hazard. Employees will not be allowed to return to work in this area until the hazard has been corrected. Evaluations of existing or potential hazards will be reviewed by the Health and Safety Advisory Committee. The committee will provide recommendations for updates to the Kodiak IIPP and safety policies as a result of the evaluations when additional practices or procedures are needed to prevent a reoccurrence of the hazard. All evaluations and/or inspections will be documented and maintained by the Safety Director (FORM IIPP-4).

## E. SAFETY SENSITIVE JOB POSITION

Kodiak Roofing & Waterproofing Co. ('Kodiak") values the health and safety of all Kodiak employees and others who may be exposed to our work activities in Kodiak workplaces. We have established an Injury and Illness Prevention Program, safety policies and safety programs designed to protect the health and safety of all Kodiak employees while working on Kodiak staffed projects. If you are in a safety sensitive position as defined below, you may be subject to additional job requirements and training to ensure your safety and the safety of your coworkers while on the job.

**Safety Sensitive Position Defined**

Your position may be classified as safety-sensitive if errors in judgement, inattentiveness or diminished coordination, dexterity, or composure while performing your duties could seriously endanger the health and safety of you, your coworkers, or third parties.

**Job Duties with Special Safety Considerations**

As a commercial roofing contracting company, Kodiak employees install a variety of roofing systems, flashings, gutters, downspouts, and wall panel systems. The application of these systems takes place on roofs, canopies, walls, and other surfaces at height. The height at these installations take place vary greatly, but typically require the use of fall prevention systems or procedures to protect our roofers from the hazards associated with falls. Even for workers on the ground, falling objects from heights present

additional hazards to other trades people or individuals during roofing activities. When policies and/or procedures are ignored or not followed, serious injuries or death can result from objects falling and striking those individuals who are present or working below roofing activities.

According to the Occupational Safety & Health Administration OSHA, falls in the construction industry account for a disproportionate number of serious injuries and fatalities each year compared to other causes on construction projects. Roofing activities by their nature expose employees to potential falls and other serious injuries if policy and procedures are not strictly followed.

When determining whether a position is safety sensitive, we consider:

1. Does the position expose the employee to a fall hazard?
2. What is the frequency of exposure to fall hazards?
3. Does the position require the employee to set-up and maintain or assist in the set-up and maintenance of fall protection systems?
4. Does the position require the employee to climb or descend a ladder or scaffold?
5. Does the position include operating heavy equipment?
6. Does the position include communicating or directing other employees in safety procedures or policy?
7. Does the position include the responsibility to rig material or communicate with a crane operator?
8. Are others exposed directly or indirectly to hazards from the work activities of the person in that job position
9. Would intoxication or being under the influence of a legal or illegal drug increase the threat of serious injury or fatality to the employee or others?

**Designated Safety Sensitive Positions:**

After a carefully reviewing and evaluating each job description against the above criteria, Kodiak has designated the following job positions as safety sensitive.

- Assistant Roofer
- Apprentice Roofer
- Journeyman
- Temporary Foreman Roofer
- Foreman Roofer
- Superintendent
- Project Manager
- Assistant Project Manager
- Project Engineer
- Commercial Delivery Driver
- Service Technician
- Assistant Service Technician
- Lead Service Technician

- Service Superintendent
- Service Crew Supervisor
- Service Technician Assistant
- Service Technician Apprentice
- Safety Coordinator
- Safety Manager
- Safety Director

Detailed job descriptions are available by contacting Kodiak's Human Resources department.

## F. INSPECTIONS

An important part of the IIPP and Safety Program is the scheduled/unscheduled inspections of office, warehouse and project job sites to identify potential safety hazards and potential causes of occupational illness. The Safety Director will randomly choose job site locations to be visited and will assign members of the Kodiak Safety Team to perform safety inspections at these locations on a daily and/or weekly basis. The purpose of these visits is to assess the Kodiak safety program and to ensure that all Kodiak, OSHA, General Contractor and/or client safety policies and regulations are followed. Inspections will be documented on Site Inspection Reports. Records of these inspections and corrective actions taken to mitigate potential safety hazards/violations will be filed in each job binder located at the Kodiak's offices. In addition to the Safety Director and his team, Project Managers, Supervisors and other management personnel are required to conduct site inspections when they visit projects staffed by Kodiak personnel.

## G. PROCESS SAFETY MANAGEMENT/CONTRACTOR RESPONSIBILITIES

The purpose of process safety management is to prevent or minimize the consequences of a catastrophic release of toxic, reactive, flammable or explosive chemicals. Kodiak has the responsibility to provide training in process safety management PSM to all affected employees for employees to perform their assigned work duties safely. To properly manage changes (MOC) to process chemicals, technology, equipment and facilities, one must define what is meant by change. In the process safety management standard, change includes all modifications to equipment, procedures, raw materials, and processing conditions other than "replacement in kind." These changes must be properly managed by identifying and reviewing them prior to implementing them. For example, the operating procedures contain the operating parameters (pressure limits, temperature ranges, flow rates, etc.) and the importance of operating within these limits. Training and evaluation will consist of:

- Proper work procedures
- Work processes/steps
- Safe use of tools and equipment
- Recognition of unsafe and hazardous conditions/behaviors
- Potential fire and explosive hazards/prevention
- Toxic release hazards/prevention
- Hot Work Permit requirements
- Management of change (MOC)

All training related to Process Safety Management PSM shall be documented and retained by the Kodiak Safety Director for a minimum of 3 years. Safe work practices and requirements have been documented in the Codes of Safe Practices of this IIPP.

### Construction/Client Projects

Kodiak personnel working on new construction, existing construction, client projects and prime projects shall comply with all general contractor General Contractor, Kodiak and/or client work procedures, safety policies and requirements. Hosting client safety training/orientation, documentation and permitting requirements shall be complied with at all times by Kodiak personnel who may be assigned to perform work on those projects. Some examples of these programs may include but are not limited to:

- Lock-out/Block-out/Tag-out
- Confined Space Entry
- Hot Work Permits
- Environmental Protection
- Evacuation Procedures

Hot work and confined space entry permits must be obtained prior to work commencing at all general contractor (GC), host client facilities and/or jobsites/projects.

Kodiak personnel shall inform the GC and/or, host client's supervisor tasked with oversight of the project whenever a potential hazard is identified while performing work at the construction site and/or client facility. Kodiak will inform the GC and/or host client whenever processes, procedures or materials used in Kodiak's work may potentially present a hazard to the facility or other personnel on the jobsite/project.

### Sub-Contractors

When Kodiak must hire sub-contractors or vendors to perform work on Kodiak staffed facilities or jobsites/projects, the sub-contractor must comply with all General Contractor, Kodiak and Host client safety policies and procedures. Copies of the sub-contractors IIPP and safety policies must be submitted to the Kodiak safety director for review prior to work commencing. Sub-contractor's safety policies and procedures shall meet OSHA and Kodiak's policies and procedures at a minimum.

### Incidents/Near Misses

All incidents/accidents and near misses must be reported to the General contractor or host client immediately following the incident. Additionally, the incident must be documented using Kodiak's Accident/Injury Investigation & Corrective Action Forms as well as on any forms required by the GC and/or host client. An investigation will be performed by the Kodiak foreman/supervisor and a member of the Kodiak Safety Team to establish a root cause and the corrective action that must be implemented to prevent a re-occurrence.

### Trade Secrets

In the process of performing work at a host client's facility and/or jobsite/project, Kodiak personnel may become familiar with trade secrets/information regarding processes, equipment, procedures etc. the client uses in their operations. Kodiak personnel are reminded they must keep such information private and confidential during and after the project work is completed. If a Kodiak employee is approached by a competitor of the host client to divulge any secrets/information regarding the client's operations, the Kodiak employee must not divulge any information. In addition, the Kodiak employee shall report the incident to Kodiak management so that this information can be communicated to the host client.

## H. TWO-WAY COMMUNICATION ON SAFETY AND OCCUPATIONAL ILLNESS

Kodiak will communicate with employees, safe work practices, occupational hazards, and illnesses, required personal protection equipment, and may also communicate these subjects in memoranda, posted notices, electronic communication, letters and in meetings. Kodiak will give appropriate positive recognition to employees who report safety hazards and potential causes of occupational illnesses or otherwise assist in the implementation of Kodiak's Safety Program. Employees may make such communications orally, but Kodiak encourages them to put reported items in writing. (FORM IIPP-7)

There will be no reprisal or job discrimination against any employee for expressing a concern, comment, or suggestion about legitimate safety-related matters. Any reprisal or threat of reprisal must be reported to the Safety Director or Human Resources (HR) immediately. Managers, supervisors, and all other employees are held equally accountable for compliance with Kodiak's safety policies and procedures. Similarly, managers, supervisors and employees who engage in unsafe practices, including violations of the applicable Code of Safe Practices, and particularly individuals who know of and do not immediately report workplace hazards will be disciplined, up to and including discharge, if failure to report exposes employee to unnecessary hazards and/or injuries. Kodiak employees shall notify their supervisor immediately if they are fatigued and feel that they cannot perform their job duties safely.

## I. OSHA INSPECTIONS

Under the Occupational Safety and Health Act of 1970, the Occupational Safety and Health Administration (OSHA) is authorized to conduct workplace inspections and investigations to determine whether employers are complying with the standards issued by OSHA for safe and healthful workplaces.

OSHA also enforces Section 5(a)(1) of the ACT known as the "General Duty Clause", which requires that every working man and woman must be provided with a safe and healthful workplace. Each state must either adopt the Federal OSHA standards or adopt standards and enforce requirements that are at least as effective as the Federal Standard. Kodiak performs work at many different locations that must comply with Federal OSHA, Cal OSHA (California OSHA) and/or other state OSHA plan standards. Kodiak complies with whichever standard is strictest at the jobsites we work at.

**Inspections**

Inspections are always conducted without advanced notice. Under certain circumstances OSHA may give advanced notice but generally it is less than 24 hours. Investigations are performed under the following circumstances:

- Imminent danger
- Accident Investigations
- Inspections that must take place after hours or under special circumstances
- Cases where notice is required to ensure that the employer or employer representative is present
- Cases where the inspection must be delayed for more than 5 working days for good cause
- Situations in which the OSHA Area Director determines that advance notice would produce a more thorough or effective investigation.

Employers who receive advanced notice of an inspection must inform their employees' representative or arrange for OSHA to do so. If an employer refuses to admit an OSHA compliance officer or the employer

attempts to interfere with the inspection, the ACT permits appropriate legal action, such as obtaining a warrant to inspect.

### Priority

OSHA prioritizes their inspections to take care situations that need the most attention. The following are the order of priority given to each situation.

- Imminent Danger – cases where immediate serious injury or death can be expected to occur.
- Catastrophes and fatal accidents.
- Complaints and referrals – formal employee complaints or other referrals of unsafe or unhealthful conditions.
- Programmed inspections – these are aimed at high hazard industries.
- Follow up inspections

### Inspection Process

When the OSHA compliance officer arrives at the job site, he or she will:

- display official credentials
- asks to meet an appropriate employer representative
- In the opening conference the compliance officer explains how the job site was selected and what the scope of the inspection will be
- The employer is given information on how to obtain applicable safety and health standards
- Compliance officer asks to be accompanied by an employer representative.
- A walk-through inspection is performed
- OSHA places emphasis on posting and record keeping and may ask for records of deaths, injuries or accidents.
- The compliance officer may ask for copies of specific elements of the company's safety program
- During the walk-through inspection, the compliance officer will point out unsafe or unhealthful conditions.
- Some violations detected by the compliance officer can be corrected immediately.
- Violations noted will form the basis of citations that may be issued.
- A closing conference is held at the end of the inspection at which time the officer will discuss unsafe of unhealthful conditions.

### Citation and Penalties

After the compliance officer reports his findings, the Area Director determines whether he or she will issue a citation based on the inspection. Once a citation is issued the employer must abate the violation within a specified time frame. There are several types of violations that may be issued as a result of an inspection.

- Other–than–Serious violations: a violation that has a direct relationship on job safety but probably would not cause death or physical harm.
- Serious Violations: where a substantial probability exists that may result in death or serious injury
- Willful Violation: where an employer intentionally and knowingly commits a violation.
- Repeat Violation: when a re-inspection reveals a repeat violation.
- Failure to Abate: failure to correct a prior violation.

## Appeals

Within 15 days of an OSHA citation, the employer has a right to contest the citation if done in writing. The employer must request an informal conference with the Area Director. During this conference, the employer may discuss issues and present additional information concerning the citation. The Area Director has authority to enter settlement agreements that revise citations and penalties to avoid prolonged legal disputes and result in speedier abatements. The Area Director will send an agreed upon modified citation and proposed penalty for the employer to sign.

## Employee Conduct

Employees of Kodiak are expected and required to comply fully with an OSHA compliance officer's reasonable request during a compliance inspection. Employees shall treat the compliance officer with respect throughout the inspection proceedings. At no time shall an employee interfere or attempt to interfere with an OSHA inspection.

# J. CRISIS MANAGEMENT PLAN

A crisis is any situation that potentially threatens the integrity and/or reputation of Kodiak and is usually brought on by negative or adverse media attention. The following are events/incidents that can potentially evolve into a crisis for Kodiak:

- Legal disputes
- Theft
- Accidents involving people or property
- Fire
- Flood
- Any manmade or natural disaster

**Kodiak employees shall respond to and report all injuries, accidents or incidents to management using the procedures spelled out in section F of the Kodiak IIPP**. In addition, to limit the potential for crisis escalation, and to disseminate consistent, accurate information that avoids conflicting reports of what happened, the following shall be observed:

- All employees are required to report any contact with the media to the Safety Director, Human Resources (HR) and/or their immediate supervisor.
- Kodiak employees including management are forbidden from making any statements "on" or "off" the record to the media or anyone inquiring into the incident.
- All persons inquiring into or requesting information concerning an incident must be referred to the Kodiak Safety Director and/or HR.
- The Safety Director and/or HR will forward the request to the appropriate management personnel for an official Kodiak response.
- Kodiak employees that are involved or that have witnessed the incident must immediately communicate all details to the Kodiak Safety Director, HR and/or Kodiak management by oral and written statements within 1 hour of the incident.
- All information collected from these statements shall be passed onto Kodiak's Crisis Management Team to be used in preparing the appropriate company response to the media and/or public.
- Only the designated Kodiak spokesman shall release information to the media and public after consultation with Kodiak's Crisis Management Team.

# K. DISCIPLINARY ACTION PLAN

We expect all Kodiak employees to comply with the requirements of Kodiak's Injury & Illness Prevention Program. When non-compliance is an issue, there are disciplinary guidelines, which will be enforced. When extenuating circumstances may potentially affect the legal and financial liability of the Company, a review by the Safety Director and Health and Safety Advisory Committee will be utilized to reach a decision on the proper disciplinary procedure.

It is the intent of the Company to encourage compliance through training and incentives. For blatant safety violations or behavior that puts an employee or others at serious risk there will be zero tolerance irrespective of established guidelines. Non-compliance that results in an accident or injury, will have more serious consequences (i.e., use of an illegal drug which contribute to an auto accident). All incidents will be investigated, and the facts will determine the resulting disciplinary action. Management and the safety director and his/her staff will work together to ensure a fair and unbiased approach to discipline as it relates to health and safety compliance. Documentation of all disciplinary action will be maintained and in effect in employee's personnel file.

**Disciplinary Guidelines:**

- Level 1 – Verbal Warning
- Level 2 – Written Warning
- Level 3 – One day suspension without pay
- Level 4 – Suspension/up to and including termination

**Enforcement Guidelines:**

- Possession, distribution, purchase, sale or transfer or use of alcohol or illegal drugs on the job:
  - First Offense: Level 4 - **suspension/up to and including termination**
- Reporting for work under the influence of alcohol
  - First Offense: Level 3 - **one day suspension**
  - Second Offense: Level 4 - **suspension/up to and including termination**
- Possession or use of any weapon or explosive on the job
  - First Offense: Level 4 - **suspension/up to and including termination**
- Verbal and/or physical altercations or making threats against an employee, customer or employee of other trades on a job site
  - First Offense: Level 3 - **suspension one day**
  - Second Offense: Level 4 - **suspension/up to and including termination**
- Smoking in restricted or prohibited areas:
  - First Offense: Level 2 - **written warning**
  - Second Offense: Level 3 - **suspension one day**
  - Third Offense: Level 4 - **suspension/up to and including termination**
- Failure to wear or use appropriate OSHA approved clothing and personal protective equipment (hard hats, work boots, safety glasses, High-visibility shirts, vests etc.):
  - First Offense: Level 2 - **written warning**
  - Second Offense: Level 3 - **suspension one day**
  - Third Offense: Level 4 - **suspension/up to and including termination**
- Failure to use fall protection when required and/or as OSHA regulations dictate:
  - First Offense: Level 4 - **suspension/up to and including termination**

- Employees working outside of thirty (30) degrees from their anchor point or having too much slack between their lifeline and lanyard (enough to allow employee to fall off roof or to fall farther than six (6) feet).
  - First Offense: Level 3 - **suspension one day**
  - Second Offense: Level 4 - **suspension/up to and including termination**
- Failure to comply with supervisor's general and/or safety instructions:
  - First Offense: Level 2 - **written warning**
  - Second Offense: Level 3 - **suspension one day**
  - Third Offense: Level 4 - **suspension/up to and including termination**
- Misuse and abuse of company resources and equipment (This can be grounds for immediate termination depending on the severity of the offence nature of the abuse.):
  - First Offense: Level 3 - **suspension one day**
  - Second Offense: Level 4 - **suspension/up to and including termination**
- Unsafe operation of equipment or tools, including use of defective safety equipment and failure to inspect equipment or tools before use:
  - First Offense: Level 2 - **written warning**
  - Second Offense: Level 3 - **suspension one day**
  - Third Offense: Level 4 - **suspension/up to and including termination**
- Failure to use delineators and caution tape or other means to protect employees, other tradesmen, the general-public and non-Kodiak personnel, property or equipment:
  - First Offense: Level 2 - **written warning**
  - Second Offense: Level 3 - **suspension one day**
  - Third Offense: Level 4 - **suspension/up to and including termination**

- Unauthorized removal of locks, hasps, blocks, disabling-devices or warning tags that have been applied to any piece of equipment/machinery to prevent said equipment/machinery from operation.
  - First Offense: Level 4 – **suspension/up to and including termination**

Employees observed committing multiple policy violations or violations to safety and health rules and regulations not defined in this plan will be handled on a case by case basis at the discretion of the foreman/supervisor and/or Safety Director. In addition to employer-controlled penalties, Federal OSHA and Cal-OSHA have specific penalties that will apply to any supervisor for failure to adhere to the Injury & Illness Prevention Program including jail time and/or fines.

# L. FIRE PREVENTION PLAN

### Purpose

The purpose of this Fire Prevention Plan is to establish procedures for identifying fire hazards and preventing fires. All employees, supervisors, and managers are expected to follow the procedures outlined in this plan to ensure that employees and other personnel visiting our facilities and/or job-sites are protected.

### Authority

California Code of Regulations, **CCR Title 8 § 3221**
Federal **29 CFR § 1910.39**

### Responsibility

David Nash is the Kodiak plan administrator and bears the overall responsibility to ensure the implementation of this plan as well as oversee the training of all employees of their responsibilities pertaining to this plan. Additionally, the plan administrator is responsible to update and/or review the effectiveness of this plan at least annually by conducting fire risk surveys of all areas that this plan covers. The following individuals have been assigned the responsibility to implement this plan in the following areas of the company's facilities and job sites.

David Nash, Safety Director is responsible for the control and/or accumulation of flammable/combustible waste materials in the offices, and related storage/break rooms.

Jeff Haas, warehouse manager is responsible for the control and/or accumulation of flammable/combustible materials in the shop and production areas and associated storage areas.

Kodiak jobsite foremen and superintendents are responsible for the control and/or accumulation of flammable/combustible materials in the Kodiak work areas at company staffed job-sites.

Gold Country Fire., Lincoln, CA has been hired to inspect, maintain and repair equipment and systems installed to prevent or control potential fires (i.e. Fire Sprinkler System, Fire Extinguishers, fire hoses, etc.).

### Identification of Fire Hazards

The following is a list of potential fire hazards and their associated work areas:

| Work Areas | Fire Hazards |
|---|---|
| Offices and cubicles | paper, plastic, electrical |
| Storage room(s) | paper, plastic, flammable/combustible liquids |
| Break room | paper, plastic, electrical appliances |
| Shop | paper, plastic, wood, flammable liquids, electrical tools, welding machines/equipment |

### House Keeping Practices

The following are the fire prevention practices associated with fire hazards identified above:

| Type of Fire Hazard | Fire Prevention Practices |
|---|---|
| Paper | Waste-paper cans emptied daily |
| Plastic | Waste plastic discarded daily |
| Electrical | Quarterly inspections of outlets, multi strips, cubicles, and work areas |
| Flammable/combustible liquid | Store liquids in approved flammable storage cabinet |
| Electrical appliances | Quarterly inspections of appliances; employees trained to inspect appliances prior to use |

| | |
|---|---|
| Smoking | Smoke only in designated smoking areas<br>Dispose of smoking materials properly in smoking receptacles not in trash cans |

## Code of Safe Work Practices

- Familiarize yourself with at least two routes for exit in case of an emergency.
- Trash and flammable debris shall not be allowed to accumulate.
- Flammables, e.g. wood, paper, flammable liquids or trash shall not be placed or stored near heaters, electrical appliance, or potential sources of ignition.
- Sources of actual or potential heat such as hot plates or electric coffee pots shall not be placed near flammable materials.
- Store potentially combustible liquids/chemicals in U/L approved steel fire-proof cabinets.
- Avoid overloading electrical circuits with office equipment i.e. computers, printers, radios etc.
- Keep all exit routes free of materials/equipment that can impede egress in case of a fire.
- Do not store materials within 3 feet of electrical cabinets and exit doors.
- Everyone is personally responsible for assuring that extension cords and plugs are in good condition.
- Cords that are missing the grounding prong, are spliced together, or that are missing their protective sheath shall not be used.
- Store used rags in metal bins with self-closing lids
- Hot work permits shall be issued before welding and/or cutting.
- Cutting and welding is to be performed by authorized personnel only.
- Welding shall only be performed in designated areas with good ventilation.
- Flammables shall not be stored in designated welding/cutting areas.

## Fire Control Measures

The following is a list of fire control measures installed or available in work areas:

| Work Area | Fire Control Measures |
|---|---|
| Offices, Break & Storage Rooms | Fire Sprinkler System<br>Fire Extinguishers located throughout the offices and shop. |
| Shop & Storage Areas | Fire Sprinkler System<br>Fire Extinguishers located throughout the offices and shop. |
| Job Sites | Fire Extinguishers |

There are 6 fire extinguishers located throughout the offices, break room and associated storage rooms.
There are 12 fire extinguishers located throughout the shop and storage areas.

## Maintenance and Inspection Program

The periodic maintenance and inspection frequencies for fire control measures are as follows:

| **Fire Control Measures** | **Inspection Frequency** | **Responsibility** |
|---|---|---|
| Sprinkler System | 3 years | TBD |

| | | |
|---|---|---|
| Fire Alarm System | Annual | TBD |
| Fire Extinguishers | Monthly/Annual | Dave Nash |

## Employee Response to Fire Emergencies

Employees' response to a fire emergency is delineated in the Emergency Action Plan. Designated and trained employees may attempt to extinguish incipient fires with fire extinguishers after sounding the alarm to alert other employees.

## Training

Employees shall be trained in basis fire prevention of potential fire hazards identified in this plan. The plan administrator shall maintain records of this training. The following is a list of the training topics that shall be included in the fire prevention training for each employee:

- Review of California's **CCR T8 §3221 and 29 CFR §1910.39** and how they can be accessed
- The elements of this plan
- Recognition of potential fire hazards
- Good housekeeping practices
- Proper response and notification procedures in the event of a fire
- Instruction on the proper use of fire extinguishers per the company's Emergency Action Plan
- Re-training on the proper use of fire extinguishers will be provided annually

This program is located at Kodiak Safety Director's office and is part of the Kodiak IIPP and is available for review upon request from the Kodiak Safety Director, management and/or supervisory personnel.

# M. EMERGENCY ACTION PLAN

Kodiak Roofing is dedicated to the protection of its employees from emergencies. When emergencies do occur, our Emergency Action Plan (EAP) is initiated. This EAP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

This EAP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any government officials who ask to see it.

**Administrative Duties**

The Company Safety Director is the EAP administrator. The Safety Director has overall responsibility for the plan. This responsibility includes the following:

- Developing and maintaining a written Emergency Action Plan for regular and after hours' work conditions;
- Notifying the proper rescue and law enforcement authorities, and the building owner/superintendent in the event of an emergency affecting the facility;
- Taking security measures to protect employees;
- Integrating the Emergency Action Plan with any existing general emergency plan covering the building or work area occupied;
- Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee;
- Conducting drills to acquaint employees with emergency procedures and to judge the effectiveness of the plan;
- Training designated employees in emergency response such as the use of fire extinguishers and the application of first aid;
- Ensuring that equipment is placed and locked in storage rooms or desks for protection;
- Maintaining records and property as necessary; and
- Ensuring that our facility meets all local fire codes, building codes, and regulations.

The Safety Director is responsible for reviewing and updating the plan as necessary. Copies of this plan may be obtained from their office.

The Safety Director and Management have the authority to decide to implement the EAP if he/she believes an emergency might threaten human health. The following potential emergencies might reasonably be expected at this facility or Kodiak staffed job sites and thus call for the implementation of this EAP:

- Hazardous Chemical Spill/Release
- Fire
- Earthquake

The Safety Director or your direct supervisor can be contacted regarding further information about the written Emergency Action Plan or an explanation of duties under this plan.
Key management personnel 24 hour telephone numbers are kept in a safe place, in the offices of all managers and at the front reception desk for immediate use in the event of an emergency.

### Alarms

Different emergencies call for different alarms to indicate what actions employees should take. Our company has established an employee alarm system. This consists of verbal communication at our facilities through the use of an intercom system or company issued mobile phones. On Kodiak staffed job sites when verbal communications may be restricted, the use of air horns or other signaling devices may be utilized.
We have posted the following emergency telephone numbers near telephones, or emergency notice boards, and other conspicuous locations for use when telephones serve as a means of reporting emergencies. These numbers will be included in each job site specific safety plan in the Emergency Action Plan Section.

- The Local Fire Department
- The Local Police Department
- The Local Hospital and Emergency Room

### Emergency Reporting and Weather Monitoring Procedures

In the Event of an Emergency Requiring Evacuation
When employees detect an emergency that requires an evacuation, such as a fire or hazardous chemical spill/release, they should immediately notify the jobsite. To facilitate the immediate evacuation of the jobsite location, the Foreman or his designated assistant will verbally notify employees and/or sound the airhorn or alternate warning device. The Foreman will use the following verbiage. "This is an Emergency Notification. This is not a drill" …. followed by a brief description of the emergency. The Foreman will then notify Emergency Services by calling 911, if applicable.

### Evacuation Procedures

Some emergencies require evacuation or escape procedures, while some require employees to stay indoors, or in a safe area. Our emergency escape procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the Safety Officer's authority in determining whether employees should remain inside or evacuate.
Employees need to know what to do if they are alerted to a specific emergency. Because most employees are located at job sites, pre-planning for each job site is necessary. The foreman, project manager and/or onsite supervisor will be responsible for identifying exits, evacuation routes and designated meeting areas prior to the commencement of work on each job site. This information will be provided in the site-specific safety plan at each job site and will be communicated at the pre-planning meeting prior to work.

After notification is initiated to evacuate, employees should take the following steps:

- Exit from the building through the safest and closest exit.
- If applicable, overhead doors should be closed, if possible, from the outside to prevent ventilation from accelerating the fire.
- No employee will re-enter the building or job site for any reason once the responsible supervisor/manager onsite has evacuated the structure.

Once evacuated, employees are to assemble at the designated meeting area or safe zone, where a head count will be performed, and further instructions given. Designated meeting areas have been identified;

- on the Emergency Evacuation Site Plan posted at each Kodiak facility.
- at each job-site location, determined by the job foreman or supervisor.

If safety conditions in this area begin to deteriorate or are not accessible, the responsible supervisor/manager will direct employees to a secondary assembly location per their discretion or the instruction of Emergency Responders.

### Procedures to Account for Employees

Trained supervisors/managers assist in safe and orderly evacuation for all types of emergencies that require evacuation. Once evacuation is complete, they conduct head counts. The employees selected are trained in the complete workplace layout and the various alternative escape routes from the workplace. Before leaving, these employees check rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to evacuate the area. All managers, supervisors and foremen are trained on how to facilitate an evacuation. This ensures a sufficient number of employees who have been designated by the company and trained to:

- Direct and assist in safe and orderly emergency evacuation,
- Provide guidance and instruction for all types of emergency situations,
- Use the buddy system, and
- Avoid hazardous areas during an emergency evacuation.

The list of trained personnel includes at least one person from every area for every shift. This means that every trained evacuation person is responsible for seeing to approximately 10 evacuated employees. The trained personnel also serve as a resource of information about emergency procedures and conduct head counts once evacuation is complete.

Foreman and supervisors must be aware of the locations of all Kodiak employees working onsite, as well as other personnel and contractors at the job site, when an emergency occurs, and be aware of who is absent or otherwise away from the premises. Accounting for employees and non-employees will aid local responding fire/rescue departments in determining whether rescue efforts are necessary. We have described each frontline supervisor's employee/non-employees tracking method below:

- Daily Employee Attendance Log included with the Job Hazard Analysis (JHA)

Once each evacuated group of employees have reached their evacuation destinations, each trained evacuation employee:

- Makes sure all persons are accounted for,
- Reports to the pre-determined assembly area, and
- Assumes role of company contact to answer questions.

Head count results should be given to the Police, Fire Chief or firefighter, if requested.

### Non-Evacuation Emergency Procedures

Non-Evacuation emergencies include Earthquakes. In the event of an earthquake:

- It is usually safest to remain inside during the event. Generally, under a desk, table, doorway, or other sturdy structure is desirable. Avoid windows, bookcases, filing cabinets or other structures that may shatter or topple over.
- There may be electrical and gas line disruption during the event. Try to avoid exposure.
- After the earthquake, search for people who may have been injured and require assistance.
- Be aware that aftershocks may occur and follow the evacuation procedures listed in the event of a fire.

### Rescue and First Aid

Rescue and first aid may be necessary during emergency situations. Circumstances calling for rescue and/or first aid include:

- Employees who have sustained injury requiring medical treatment.
- Employees who may be trapped in the building or work area.

Professional emergency services responding in an emergency will help with and direct all rescue and medical duty assignments upon their arrival on site.

### Training

The Kodiak Safety Director reviews the Emergency Action Plan at the following times with each employee covered by the plan:

- Initially when the plan is developed,
- Whenever a new employee is hired,
- Whenever the employee is assigned initially to a job,
- Whenever an employee's responsibilities or designated actions under the plan change,
- Whenever new equipment, materials, or processes are introduced into the workplace,
- Whenever the layout or design or the facility changes,
- Prior to commencing work at a new job site, and
- Whenever the plan is changed.

We present the material for training in the following manner:

- Bridge Learning Management System LMS courses

- We communicate the contents of this plan through a briefing delivered by supervisors followed by a demonstration.
- The training includes review of the EAP and verification of understanding using a written exam.
- Refresher training will be provided annually.

# N. FIRST AID PROGRAM

### Purpose

Kodiak Roofing is dedicated to the protection of its employees from on-the-job injuries and illnesses. However, when injuries or illnesses do occur, we are prepared to immediately respond to the needs of the injured or ill.

This written First Aid Program is intended to ensure that Kodiak Roofing meets the requirements of CCR Title 8 Section 1512 of the Construction Safety Orders.

### Administrative Duties

The responsibility for the implementation our First Aid Program has been assigned to David Nash, who is the designated Safety Director for our company. The Safety Director is responsible for establishing and implementing the written First Aid Program. This person has full authority to make necessary decisions to ensure the success of this program. Copies of this written program may be obtained from the Safety Director and are also available for review in your field safety manual. If after reading this program, you find that improvements can be made, please contact the Safety Director. We encourage all suggestions because we are committed to the success of this written program.

### First Aid Personnel

Our company has made arrangements with US Healthworks and their physicians are readily available for advice and consultation on matters of worksite health.

The following positions are trained to render first aid and CPR at Kodiak Roofing:

**Job Site Foremen**
**Supervisors**
**Safety Department Personnel**
**Specific Field/Craft Employees**

### Hazard and Medical Services Assessment

Kodiak Roofing has performed Job Hazard Analysis of duties performed by employees in order to determine whether any pose the risk of a life-threatening or permanently disabling injury or illness.

It was determined that the following injuries or illnesses are likely:

- **Lacerations caused by saws and power tools**
- **Falls from heights**
- **Exposure to harmful chemicals**
- **Exposure to heat and sunlight**
- **Exposure to industrial trucks and heavy equipment**
- **Exposure to electrical hazards**

The nearest hospital, clinic, or infirmary, USHW, is located address.

That means that USHW is considered in near proximity because it is within three to four minutes away.

When hazards or locations change, the Safety Director re-assesses our risk and determines whether or not we are required to train an on-site employee in first aid.
Because the company performs work at various locations throughout California, Nevada and various other states, the company provides a medical provider listing in each Site Specific Safety Plan. This listing will be used by job site foremen and safety team members to determine the closest medical provider to a given job site, prior to commencement of work. In the event that there is no provider or ER Room within 3 to 4 minutes of the job site, a certified first aid/CPR employee will be provided at the job site.

## First Aid Supplies and Equipment

It is important that our first aid supplies and equipment meet the specific needs of our workplace and worksites. Our company Safety Director ensures that adequate first aid supplies are readily available, including:

- Adhesive dressing
- Adhesive tape rolls, 1-inch wide
- Eye dressing packet
- 1-inch gauze bandage roll or compress
- 2-inch gauze bandage roll or compress
- 4-inch gauze bandage roll or compress
- Sterile gauze pads, 2-inch square
- Sterile gauze pads, 4-inch square
- Sterile surgical pads suitable for pressure dressings
- Triangular bandages
- Safety pins
- Tweezers and scissors

We provide these supplies at our primary place of business and at every job-site. The company Safety Director or designee checks the first aid supplies monthly through the use of a safety inspection checklist. Supplies are replaced promptly when expended.
In addition to first aid supplies, we train our staff on the procedures for transporting an injured employee to the nearest medical facility. When immediate medical treatment is needed, the job site foreman or competent person will assist the injured worker to the company vehicle and transport them to the medical facility. If the injured worker is unconscious emergency medical services will be call by dialing 911.
Because we have injurious corrosive materials, Kodiak Roofing provides these drenching and flushing facilities that meet the specifications of ANSI Z358.1, Emergency Eyewash and Shower Equipment:

| **Location** | **Type of Equipment** |
|---|---|
| Shop | Eye Wash Tank and Drench Hose |
| Job Site | Portable Eye Wash Bottles |

## Training and Certification

After an employee has completed our training program, the trainer will determine whether the employee can safely perform first aid. The company Safety Director is responsible for keeping records verifying certification of each employee who has successfully completed training.

Each certificate is a valid certificate in first-aid training, and certification includes the name of the employee, the date(s) of the training, and the signature of the person who performed the training and evaluation.  Trained employees are retrained every 2 years to keep their knowledge and skills current.

### Accident Reporting

After the immediate needs of an injury or illness emergency have been met, we require our employees to report the event to their supervisor. Even injuries that do not become apparent until after the cause must be reported. For example, back pain that develops over a period of time must be reported.

### Recordkeeping

The company Safety Director is responsible for maintaining the records and documentation relating to first aid, injuries, illnesses, and accidents.

### Program Evaluation

By having the Safety Director and Safety Consultants thoroughly evaluate and, as necessary, revise our program, we ensure our program's effectiveness and prevent or eliminate any problems. Program evaluation is performed annually.

# O. BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN

## Exposure Determination

Federal OSHA and Cal-OSHA requires employers to perform an exposure determination concerning which employees may incur occupational exposure to blood or other potentially infectious materials. The exposure determination is made without regard to the use of personal protective equipment (i.e., employees are considered to be exposed even if they wear personal protective equipment). This exposure determination is required to list all job classification in which all employees may be expected to incur such occupation exposure, regardless of frequency **29 CFR 1910.1020** or **CCR T8 §5193**. At Kodiak facilities and jobsites/projects, the following job classifications are in this category:

- General Office (Management, Supervisory and Clerical)
- Warehouse Personnel
- Field Personnel

Not all employees in these categories would be expected to incur exposure to blood or other potentially infectious materials. Tasks or procedures that would cause these employees to have occupational exposure are also listed in order to clearly understand which employees in these categories are considered to have occupational exposure. The job classifications and associated tasks for these categories are:

| **Job Classification** | **Tasks/Procedures** |
|---|---|
| General Office | Administering First Aid |
| Warehouse Personnel | Administering First Aid |
| Field Personnel | Administering First Aid |

## Compliance Methods

- Universal precautions will be observed at this facility in order to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious material will be considered infectious regardless of the perceived status of the source individual.
- Personal Protective equipment (Disposable gloves, safety glasses, breathing barriers) will be utilized to eliminate or minimize exposure to employees at Kodiak facilities, jobsites/projects.
- Hand washing facilities are available to employees who incur exposure to blood or other potentially infectious materials.
  - At Kodiak facilities, hand washing facilities are located in each restroom and the kitchen/break area.
  - At Kodiak jobsites/projects hand washing facilities are usually provided by the General Contractor near the portable lavatories.
  - In the absence of handwashing facilities, antiseptic towelettes or hand sanitizer will be provided. When this alternative is used, the hands are to be washed with soap and running water as soon as feasible.
  - Kodiak foremen will maintain a readily available supply of antiseptic towelettes in the Kodiak job box, truck or work trailer.
- After removal of personal protective gloves, employees shall wash hands and any other potentially contaminated skin area immediately or as soon as feasible with soap and water.
- If employees incur exposure to their skin or mucous membranes, those areas shall be washed or flushed with water as appropriate as soon as feasible following contact.
-

## Work Area Restrictions

In work areas where there is a reasonable likelihood of exposure to blood or other potentially infectious materials, employees are not to eat, drink, apply cosmetics or lip balm or handle contact lenses.

## Contaminated Equipment

Equipment that has become contaminated with blood or other potentially infectious materials shall be examined before using or servicing

## Personal Protective Equipment

- All personal protective equipment (PPE) used at this facility will be provided without cost to employees.
- PPE will be chosen based on the anticipated exposure to blood or other potentially infectious materials.
- The PPE will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach the employees' clothing, skin, eyes, mouth or other mucous membranes under normal conditions of use and for the duration of time the PPE will be used.
- Personal Protective Equipment PPE will be provided at no cost to Kodiak personnel. The following PPE shall be utilized as follows:

| Personal Protective Equipment | Task |
|---|---|
| Disposable Non-Permeable Gloves | Administering First Aid |
| Protective Eyewear | Administering First Aid |
| Breathing Barrier | Administering First Aid |

- All PPE utilized during the administration of first aid shall be disposed of immediately following the incident.
- Replacements PPE will be made by Kodiak at no cost to employees.
- All garments contaminated by blood or bodily fluids shall be removed immediately and disposed of or laundered as soon as feasible.
- Disposable non-permeable gloves shall be worn by Kodiak personnel when administering first aid.
- Disposable non-permeable gloves are located in the First Aid Kits located at Kodiak facilities or jobsite/projects.
- Disposable gloves are not to be washed or decontaminated for re-use and are to be replaced as soon as practical when they become contaminated or as soon as feasible if they are torn, punctured or when their ability to function as a barrier is compromised.
- Safety glasses used as eye protection shall be utilized when administering first aid.
- Safety glasses are issued to all employees when hired.
- Replacement safety glasses are available from the Kodiak safety director, supervisors and foremen.
- A spare pair of safety glasses are available at Kodiak facilities in the first aid kit.
- A breathing barrier shall be used when Cardio Pulmonary Resuscitation CPR must be performed.
- Breathing barriers shall be located in each first aid kit at Kodiak facilities or jobsites/projects

## Decontamination

- All contaminated work surfaces will be decontaminated immediately after the administration of first aid or as soon as feasible.
- A blood/bodily fluids spill kit shall be utilized when decontaminating surfaces after first aid has been administered.
- A blood/bodily fluids spill kit is located at each Kodiak facility at the First Aid Kit location.
- All cleaning supplies utilized in decontaminating the area shall be disposed of properly.

## Hepatitis B Vaccine

- All Kodiak personnel who have been identified as having exposure to blood or other potentially infectious materials will be offered the Hepatitis B vaccine, at no cost to the employee.
- The vaccine will be offered within 10 working days of their initial exposure to blood or bodily fluids unless the employee has previously had the vaccine or who wishes to submit to antibody testing which shows the employee to have sufficient immunity.
- Kodiak personnel who decline the Hepatitis B vaccine will be required to sign a waiver that uses the wording in Appendix A of either **29 CFR 1910.1030 or CCR T8 §5193** as applicable.
- Kodiak personnel who initially decline the vaccine but who later wish to have it may then have the vaccine provided to them at no cost.

## Post-Exposure Evaluation and Follow-Up

- When a Kodiak employee incurs an exposure incident, it should be reported to the Kodiak Safety Director.
- All Kodiak personnel who incur an exposure incident will be offered post-exposure evaluation and follow-up in accordance with the OSHA standard.
- This follow-up will include the following:
  - Documentation of the route of exposure and the circumstances related to the incident.
  - If possible, the identification and status of the source individual. The blood of the source individual will be tested (after consent is obtained) for HIV/HBV infectivity.
  - Results of testing of the source individual will be made available to the exposed employee with the exposed employee informed as to the applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual.
- The employee will be offered the option of having blood collected for testing of the employee's HIV/HBV serological status. The blood sample will be preserved for up to 90 days to allow the employee to decide if the blood should be tested for HIV serological status. However, if the employee decides prior to that time that testing will or will not be conducted, the appropriate action can be taken and the blood sample discarded.
- The employee will be offered post-exposure prophylaxis in accordance with the current recommendations of the U.S. Public Health Services.
- The employee will be given appropriate counseling concerning precautions to take during the period after the exposure incident.
- The employee will also be given information on what potential illnesses to be alert for and to report any related experiences to appropriate personnel.

- The Kodiak Safety Director has been designated to assure that the policy outlined here is effectively carried out as well as maintain records related to this policy

### Interaction with Health Care Professionals

- A written opinion shall be obtained from the health care professional who evaluates Kodiak personnel. Written opinions will be obtained in the following instances:
  - When the employee is sent to obtain the Hepatitis B vaccine.
  - Whenever the employee is sent to a health care professional following an exposure incident.
- Health care professionals shall be instructed to limit their opinions to:
  - Whether the Hepatitis B vaccine is indicated and if the employee has received the vaccine, or for evaluation following an incident;
  - That the employee has been informed of the results of the evaluation; and
  - That the employee has been told about any medical conditions resulting from exposure to blood or other potential infectious materials.

### Training

Training for Kodiak personnel will be conducted during the initial assignment to tasks where occupational exposure may occur and annually thereafter. Training will include the following:

- The OSHA standard for blood borne pathogens
- Epidemiology and symptomatology of blood borne diseases
- Modes of transmission of blood borne pathogens
- This Exposure Control Plan (e.g., points of the plan, lines of responsibility, how the plan will be implemented, etc.)
- Procedures that might cause exposure to blood or other potentially infectious materials at Kodiak facilities and/or jobsites/projects.
- Control methods that will be used at the facility to control exposure to blood or other potentially infectious materials.
- Personal Protective Equipment available at this facility and who should be contacted concerning PPE
- Post-exposure evaluation and follow-up
- Signs and labels used at the facility
- Hepatitis B vaccine program at the facility

Kodiak personnel trained and certified in first aid will receive annual refresher training. (Note this training is to be conducted within one year of the employee's previous training.)

### Recordkeeping

As required by this standard, the following records will be maintained by the Kodiak Safety Director and/or the Human Resources dept.

- Medical Record
- Training Records
- Training records will be kept for a period of at least three (3) years.
- Medical Records will be maintained for a duration of an employee's employment with Kodiak plus 30 years. **29 CFR 1910.1020, CCR T8 §5193**

A copy of this Blood-Borne Pathogens Exposure Control Plan is available to all Kodiak personnel. Copies of this plan may be obtained from the Kodiak Safety Director, management or supervisory personnel.

# P. FALL PROTECTION PLAN

Kodiak is dedicated to the protection of its employees from on the job injuries. To ensure the safety of all Kodiak employees and non-Kodiak personnel on each jobsite Kodiak has developed and implemented this Fall Protection Plan. All Kodiak employees have a responsibility to work safely. Employees will receive training in identifying and/or recognizing fall hazards and the proper use of fall protection equipment. Employees will also be instructed as to which equipment to use in specific work environments and demonstrate proper tie-off procedures. Employees will also be instructed on the inspection and maintenance of fall protection equipment. The following aspects of the Kodiak Fall Protection Plan are detailed throughout this plan.

- General Fall Protection Training and Guidelines
- Fall Hazard Analysis
- Site Specific Safety Plan
- Fall Restraint/Positioning
- Guardrails
- Warning Lines
- Controlled Access Zones (CAZ)
- Safety Monitoring
- Skylights, Holes and Roof Openings
- Residential Roofing
- Falling Object Protection
- Rescue and First-Aid
- Enforcement
- Accident Investigation
- Changes to the Plan

### General Fall Protection Training and Guidelines:

All Kodiak employees shall be trained in fall protection prior to using fall protection equipment on the jobsite. The following are topics that shall be covered in training:

- **Warnings:** Read all instructions and warnings on and in the product packaging before using any new fall protection equipment.
- **Storage:** Store components under conditions that will not alter or damage system components. Avoid storing fall protection equipment in areas that will expose equipment to sharp objects, chemicals, direct sunlight, rain, snow etc.
- **Training:** Employees will receive training in the proper use of fall protection equipment by a competent person selected by the management of the company. Training shall be provided to all new employees prior to working on a Kodiak project.
- **Re-training:** Employees shall be retrained under the following criteria:
  - Refresher training through twice yearly tailgate safety meetings
  - It is determined that the affected employee does not have the knowledge, understanding or skill necessary to work safely at height
  - Post-accident or near miss
  - When new fall equipment/systems are introduced into the workplace
  - When changes to the work place render previous training obsolete
- **Documentation:** Fall protection training will be document. Documentation records will include participants names, date of training and instructors name and signature. Documentation will be retained by the Safety Director with copies filed in each participants HR File.
- **Regulations:** A Copy of the State or Federal OSHA fall protection standard will be available for review to any employee upon request.

- **Rescue Pre-Planning:** To minimize the time between a fall occurrence and medical attention, a site-specific rescue plan shall be prepared by the competent person onsite. The affected Kodiak personnel will receive instruction on elements of the rescue plan and the proper rescue techniques specific to that job-site/project.
- **Equipment:** Employees will be trained in the basic systems available for fall protection
  - Full body harness with sliding back D-ring
  - Shock absorbing lanyards with locking snaps
  - Select anchorage points which are attached to structural components of the roof. Anchors shall be located as close as possible to the user; if possible, directly overhead.
  - Anchorages shall be capable of supporting a static load of 5000lbs
  - Proper Tie-Off Procedures: when using a full body harness, connecting devices should be attached to the D-ring in the middle of the back. Side D-rings should be used for positioning only, not fall arrest.
  - Workers must also tie-off in a manner that ensures no lower level is struck during a fall. PFAS components shall be rigged to prevent the worker from falling more than six (6) feet before the system components engage.
  - Do not tie-off around sharp or rough edges. Tie-off straps or a rope sleeve should be used as protection against abrasion and cutting.
- **System Components:** Only components approved for use by the company shall be used. **IN THE EVENT OF A FALL, ALL COMPONENTS OF THE FALL ARREST SYSTEM ARE TO BE REMOVED FROM SERVICE UNTIL INSPECTED, REPAIRED OR REPLACED BY THE MANUFACTURER.**

### Equipment Inspection Check List

Equipment should be checked daily before use. All PFAS components shall meet applicable current OSHA and/or ANSI standards for fall arrest equipment. Any equipment where defects are found shall be immediately taken out of service and replaced. The following are conditions to inspect for:

- Harness/Positioning belt - check for frayed edges, broken fibers, pulled stitches, cuts or chemical damage.
- D-Rings – Check D-Rings and D-Ring metal wear pad (if applicable) for distortion, cracks, breaks and rough or sharp edges.
- Attachments of Buckles – Note unusual wear, frayed or cut fibers, distortion of buckles/D-rings. Check all rivets.
- Frayed or Broken Strands – Check webbing surface for broken/cut stitches.
- Tongue or Billet–Inspect for loose, distorted or broken grommets.
- Tongue Buckle – Check for distortion or sharp edges.
- Friction Buckle – Outer bars and center bars must be straight. Check corners and attachment points of the center bar.
- Lanyard Inspection - Inspect for hook and eye distortions, cracks, corrosion or pitted surfaces.
- Thimbles – Edges of thimble must be free of sharp edges, distortion or cracks.
- Steel Lanyard – Check for cuts, frayed areas and unusual wear patterns.
- Web Lanyard – Check for swelling, discoloration, cracks, and charring from heat/chemical damage.
- Rope Lanyard – Check for fuzzy, worn, broken or cut fibers.

- Harness and lanyards will be kept in service for only 5 years from manufacturer's date.

## Fall Hazard Analysis

A Fall Hazard Analysis shall be performed by a qualified person in-order to determine if there are special circumstances or safety needs in-order to ensure the safety of all personnel on the job site. The following items/situations shall be evaluated and addressed prior to work commencing:

- Determine the vertical/horizontal movements at the work site.
- Consider the number of workers involved.
- Evaluate type of roofing materials to be installed.
- Determine the slope of the roof and the type of fall protection systems/equipment that will be used.
- What mobile equipment will be needed (aerial lifts, fork lifts, cranes etc.)
- Do any of the following conditions exist:
  - Are there overhead electric lines/obstructions that pose a hazard?
  - How will access to the roof be accomplished?
  - If ladders are used for access, what type, size and rating shall be required?
  - Will there be a scaffold in place?
  - Are there any surfaces with questionable strength?
  - Are there slipping hazards that must be corrected?
  - Is all sheathing securely fastened?
  - Are there unprotected sides or edges?
  - What is the slope of the roof?
  - Is a leading-edge present?
  - Will hoisting of materials be necessary?
  - Are there roof openings/skylights?
  - Where are roofing materials to be staged?
  - How and when is waste debris/scrap to be stored/removed from the roof?
  - What are the anticipated weather conditions?
  - What additional PPE may be required?

## Site Specific Safety Plan

Once the qualified person has performed a fall hazard analysis, he/she will prepare a site- specific safety plan for the project. This plan shall be included in the foreman's pack and shall be reviewed with all Kodiak personnel assigned to the project.

## Fall Restraint/Positioning

Occasionally, work must be performed on structures where the eave/edge of the working surface is located above six (6) feet but below eighteen (18) feet. When this condition exists, a PFAS will not prevent the worker from potentially striking a lower surface during a fall. In these situations, the worker(s) shall be provided self-retracting lifelines (SRL) in lieu of the rope lifeline, rope grab and shock absorbing lanyard. These positioning devices are designed to limit free-fall to less than two (2) feet before engagement. Under all circumstances, workers shall always maintain their PFAS components in a manner that will prevent them from reaching an unprotected edge.

## Guardrails

Guardrails are the preferred method to protect workers from falls from roofs or elevated surfaces. Most roofing designs preclude the use of guardrails as the anchoring requirements interfere with installation of the roofing systems. When guardrails are a viable option, they will comply with the following:

- The top surface of the top rail shall be 42" ±3" high.
- The mid rail shall be placed at 21" or midway between the top rail and the walking/working surface
- Toe boards shall be installed no more than ¼" above the walking/working surface and shall be 4" high.
- The railing material shall be at least ½" in diameter.
- The top rail shall can resist a force of 200 lbs. in a downward and outward direction
- Mid- rails shall be capable of resisting a force of 150 lbs.
- Toe boards shall be capable of resisting a force of 50 lbs.

## Warning Lines

Where no guardrail or parapet wall extends 42" ±3" above the roof surface, perimeter warning lines may be utilized. Warning lines shall be flagged with highly visible materials at six (6) foot intervals. They are to be installed 34" to 39" above the roof surface as a warning to employees that they are approaching the edge of the roof.

- Warning line systems utilized must be manufactured to meet OSHA requirements for tipping over and the line shall have a minimum tensile strength of 500 pounds. Lines shall be secured at each stanchion.
- Warning lines will be placed no closer than six (6) feet from the roof edge and if a felt layer or powered equipment is being used, the warning lines must be a minimum of ten (10) feet from the working edge of the roof that is perpendicular to the direction of the work.
- Warning lines shall be erected around the complete perimeter or surrounding the work that is in progress.
- Warning lines must be moved to provide continuous warning to employees in the immediate work area.
- Two warning lines must establish a point of access.
- When warning lines and headers are impractical due to the roof being irregular in shape or work must be performed outside the perimeter of the warning line system, the workers outside the perimeter must be tied-off.

## Controlled Access Zones (Caz)

When using the Plan to implement the fall protection options available, workers must be protected through limited access to high hazard locations. Before any non-conventional fall protection systems are used as part of a work plan, a CAZ shall be clearly defined by the competent person as an area where a recognized hazard exists. The demarcation of the CAZ shall be communicated by the competent person in a recognized manner, either through signs, wires, tapes, ropes or chains.

Kodiak shall take the following steps to ensure that the CAZ is clearly marked or controlled by the competent person:

- All access to the CAZ must be restricted to authorized entrants
- All workers who are permitted in the CAZ shall be listed in the appropriate sections of the Plan or be visibly identifiable by the competent person prior to implementation.
- The competent person shall ensure that all protective elements of the CAZ be implemented prior to the beginning of work.

## Safety Monitoring System

A safety monitor is a competent person designated by the employer to monitor the safety of other employees exposed to potential fall hazards. Kodiak utilizes a safety monitor for fall protection only as a last resort. Only situations where another means of keeping Kodiak personnel safe is not available will Kodiak utilize a safety monitor. Kodiak shall ensure that the safety monitor complies with basic requirements as follows:

- The safety Monitor must be competent in recognizing potential fall hazards.
- The safety monitor must warn the employee being monitored when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner.
- The safety monitor must have an unobstructed view of all employees being monitored and communicate orally with, and be on the same walking/working surface as the employee(s) he is monitoring.
- The safety monitor shall not have any other responsibilities which could distract his attention from the monitoring function.
- The safety monitor must be identified by a Blue Vest and Blue Hard Hat.
- No employee other than the employees covered by the site-specific safety plan shall be allowed in an area where personnel are being protected by a safety monitor.
- The use of a safety monitor on any Kodiak job-site/project must be pre-approved by the Kodiak Safety Director and upper management prior to mobilization.
- When a safety monitor has been approved, no one person may be assigned safety monitor duties of more than 2 hours out of an 8-hour day.
- Every employee working under the supervision of a safety monitor shall be directed to comply promptly with fall hazard warnings from the safety monitor.

## Skylights, Holes and Roof Openings

Skylights, holes and roof openings larger than 2”x 2” shall be securely covered or must be barricaded. When working around skylights, holes or roof openings the following procedures shall be used:

- A barricade may be used which would prevent a fall, but would allow the roofing material to be roofed into the skylight.
- Fall protection including a harness and lanyard with a shock absorber may be required when working around holes and skylights.
- This is a site-specific safety evaluation which must be made the in planning a job.
- Smaller opening must be covered with a secured product that withstand at least two times the weight of the work and materials that may be placed on them.

- For small irregularities or drain openings, traffic cones may be utilized to cover an area to prevent tripping.
- Temporary covers shall have “hole” or “cover” painted on them or be color-coded.
- When it is necessary to work around the perimeter of a skylight,
- Fall protection height is required when working 6’ above a lower level
- Projects will be evaluated based on the slope, presence of a parapet wall and other job site specifics in determining fall protection requirements.
- The project manager, superintendent or Safety Director will be able to provide guidance for necessary fall protection standards.

### Falling Object Protection

When roofing work is performed above a lower surface area where persons may be present, precautions shall be implemented to protect them from potential falling debris, materials and tools. The following precautions are options available for implementation to protect persons on exposed lower surfaces:

- Barricades or fencing shall be installed to prevent access to areas directly below roofing operations
- Toe boards shall be installed along the eave directly above the exposed area.
- Tools shall be equipped with lanyards to prevent them from falling to a lower level
- Materials and debris shall be secured to prevent displacement.

### Rescue and First-Aid

Ultimately, preventing injuries and falls from occurring is the goal of this plan. If a fall does occur, it is very important for the employee involved to be rescued immediately. Serious health problems can begin to affect the body if the individual hangs in a harness for more than 15 minutes after a fall. Self-rescue, if possible is the best method to use after a fall has occurred. If self-rescue is impossible the following shall be followed:

- A boom, manor fork lift shall be used to rescue the fallen employee.
- A ladder shall be positioned (be sure it is level and stable) under the employee to allow the employee a way to self-rescue.
- A rescue positioning device (RPD) shall be utilized when no other means is available to rescue the fallen employee.
- If no other means is available call 911 for assistance.

In the event of a fall the employee must try to minimize the effects on his/her body by trying to move his/her arms and legs frequently to help minimize trauma related to restricted blood flow.

After a fall the employee must be taken to a medical facility and checked and treated for fall related issues. The employee must be cleared to return to work by the physician or first-aid provider prior to returning to work.

### Enforcement

Constant awareness of and respect for fall hazards, and compliance with all safety rules and guidelines are considered conditions of employment here at Kodiak. The job foreman, superintendent, project manager, safety director and Kodiak management personnel reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines and policies

of this Plan. The Kodiak Disciplinary Action Plan spells out disciplinary actions that shall be taken to enforce this plan.

### Accident Investigation

All accidents that result in injuries to employees or non-Kodiak personnel, regardless of their nature, shall be reported and investigated. It is an integral part of any safety program that documentation takes place as soon as possible so that the cause and means of prevention can be identified to prevent a reoccurrence. In the event of a fall or other serious event, the Health and Safety Advisory Committee shall review this plan and make additional changes or additions to prevent similar accidents or falls from happening.

### Changes to The Plan

Any changes to this Plan will be approved by the Kodak Health and Safety Advisory Committee. This plan shall be reviewed by a qualified person as each job progresses to determine if additional practices, procedures or training needs to be implemented by Kodiak to improve or provide additional fall protection. Employees shall be notified and trained in these new procedures as they are implemented. A copy of this plan and all approved changes shall be maintained at the job site.

### Policy Enforcement

Kodiak has implemented a Zero tolerance policy concerning Fall Protection on all Kodiak jobsites. This means that employees must be protected from falling when exposed to a potential fall of six feet (6') or more. Employees found in violation of this policy will be disciplined per the Kodiak Disciplinary Action Plan. In order to maintain consistency between Kodiak's California and Nevada operations, Kodiak's Fall Protection policies shall mirror the Federal OSHA standards found in 29 CFR 1926.500-503

Employees must be protected from falling by use of a Guardrail system, Safety Nets, Warning Line System or the use of a Personal Fall Arrest System (PFAS). A Safety Monitor alone can be used on low sloped roofs (4:12 pitch or less) if the roof is less than fifty (50') wide. The Safety Monitor must be clearly identifiable (Blue Hard Hat and Blue Safety Vest) and must be on the same working surface/level as those persons he is monitoring. The safety monitor cannot have any duties that will take his attention away from monitoring workers. The use of a safety monitor on Kodiak jobs/projects requires the pre-approval of the PM, Superintendent and Safety Director and will be approved when no other means is available as determined by the Safety Director, Project Manager and General Superintendent.

Parapet walls that are 39" (Federal) 42" (California) or taller after roofing material has been installed will be considered equivalent to a guardrail.

Warning lines must be set back at least six feet (6') from the edge of the roof or working surface. Warning lines must be flagged at a minimum of six foot (6') intervals. The tensile strength of the warning line rope must be at least 500 lbs. Work performed between the roof edge and a warning line system requires the use of a Personal Fall Arrest System (PFAS).

When on a job that requires tie off (6' above a lower surface) and there are no guardrails or warning lines in place, employees must tie off immediately when stepping onto the roof or working surface. Employees leaving the roof or working surface must be tied off until they have grasped the ladder to come down from the roof. When accessing the roof the first time when the job begins, the first person on the roof shall install an anchor and tie off immediately. This same person shall install additional anchors and attach rope lifelines for employees that follow who are accessing the roof to begin work. Additional ropes and

rope grabs/SRL's (yo–yo's) shall be installed at intervals on the roof that will allow employees to be tied off while preventing the possibility of a swing fall to occur. Employees are to ensure that they are not working at more than a thirty (30) degree angle from either side of their anchor point to prevent the possibility of a swing fall. In addition, PFAS components shall be rigged to prevent the worker from falling more than six (6) feet before the PFAS components engage.

When on a low slope roof, employees are forbidden to detach from their lifeline or anchorage and walk over to another lifeline or anchor to re-attach. When a double-leg lanyard is not available, employee must remain attached to their lifeline until the next lifeline is grasped. Next, the employee shall ensure that their footing is adequate and then transfer their lanyard to the next lifeline. When on a steep slope roof (greater than a 4:12 pitch) employees are required to use a double-leg lanyard. When transferring from one lifeline to another, employee shall attach to the next lifeline prior to detaching from the previous lifeline.

Holes (defined as any gap, void or opening greater that 2" in its least dimension) and skylights must be covered and secured with material that can withstand twice the weight of a worker (including tools and equipment). Skylight lenses are not considered adequate to protect workers from falls and must be covered or barricaded. The covers must be marked with the word "HOLE" or "COVER". Guardrails can be used around holes or skylights as a means of fall protection. In the absence of guardrails, warning lines or covers, employees must be tied off when working around holes or skylights.

Wall openings and windows shall be covered or guarded to prevent falls or a Personal Fall Protection System (PFAS) shall be used to protect employees.

Roof Hatches must be protected by guardrails or closed in-order to meet OSHA requirements for fall protection.

Fall Protection is not required for persons who are engaged in inspecting and/or measuring the job/project prior to the start of the job or after all work has been completed. Once the job/project has begun or is in progress, fall protection is required of all employees who are exposed to potential falls.

Ladders must be secured when set up to prevent displacement. The top of the ladder must extend at least 3' above the landing surface. Ladders must be used as per manufacturer's instructions. Step-ladders shall not be used unless all 4 feet are on a firm level surface and the spreader bars are locked. Inspect all ladders prior to use. When setting up or taking down extension ladders, one person must brace the bottom of the ladder while a second person ties/unties the ladder. (29CFR 1926.1050-1053).

Employees working 6' above a lower surface/level from scaffolds shall be protected from falls. Scaffolds shall be inspected prior to use for defects or unsafe conditions. Scaffolds that are unsafe shall not be used by Kodiak employees. If guardrails are not present, Kodiak employees shall be protected from falls using a Personal Fall Arrest System (PFAS). Scaffold components shall not be used as anchor points for PFAS. Anchorage points shall be independent of scaffolds. (29CFR1926.450-454)

When using aerial/boom lifts, employees in the basket must be tied off to the anchor point in the basket by use of a harness and lanyard. Employees must tie off as soon as they have entered the boom/aerial lift basket. It is forbidden to operate or work from an aerial/boom lift unless all occupants in the basket are tied off. When accessing a roof or working surface from a boom/aerial lift, a double-leg lanyard must be used to allow employee to attach to a lifeline on the roof/working surface prior to detaching from the lift basket. Employees accessing the aerial/boom lift from a roof or working surface must attach to the lift basket (at the proper anchor point) prior to detaching from the roof anchorage. Scissor lifts do not require tie off unless specified by the scissor lift manufacturer, rental company or General Contractor.

***KODIAK EMPLOYEES ARE PROHIBITED FROM WORKING ALONE WHILE ON PROJECTS THAT REQUIRE FALL PROTECTION.***

## Enforcement Guidelines

The jobsite foreman/supervisor is responsible to ensure that the Kodiak Fall Protection policy is implemented. Foremen who knowingly or willingly allow workers to violate the Kodiak Fall Protection policy will be terminated along with the employee(s) who are in violation of this policy.

The following guidelines shall be followed in the event of a violation (Non- foreman/supervisor):

- Attempt to get a photograph of violation occurring if employee(s) is not in imminent danger.
- Employee shall be directed to tie off immediately and to descend from the roof/working surface safely.
- If Foreman was unaware of the violation the following shall apply:
  - Foreman shall be informed of violation.
  - Fill out an Employee Warning/Incident Report in detail. Describe what you saw, the time, date, jobsite, location of violation, foreman, your name, what was employee doing at time of violation etc. Have employee check box as to whether he/she agrees with your statements and sign the form.
  - Call the Superintendent and/or Project Manager and inform them as to what happened and request that a driver (neutral 3rd party) come to accompany violator back to the office or home.
  - Inform violator that they have been placed on immediate suspension.
  - Violator should not be allowed back onto roof/working surface after being informed of suspension. Violator should not be left alone after suspension to prevent possible fraudulent injury claims.
  - Ask employee for their timecard and a current phone number.
  - Ask foreman to gather employee's tools and bring them to employee.
  - Collect all safety gear or other equipment the company has issued to employee.
  - If at an out-of-town location, the driver (neutral 3rd party) shall accompany the employee to the motel to gather his/her personal belongings.
  - Driver shall take employee back to office or home.
  - If employee becomes confrontational or abusive call the superintendent, PM or Human Resources for help to arrange for alternate transportation for violator.

The following guidelines shall be followed in the event of a violation (foreman/supervisor):

- Attempt to get a photograph of violation(s) occurring if employee(s) is not in imminent danger.
- Employee(s) shall be directed to tie off immediately and to descend from the roof/working surface safely.
- If foreman was aware of the violation the following shall apply:
  - Fill out an Employee Warning/Incident Report in detail for each violator including foreman. Describe what you saw, the time, date, jobsite, location of violation, foreman, your name, what was employee doing at time of violation etc. Have employee(s) check box as to whether he/she agrees with your statements and sign the form.

- Call the Superintendent and/or Project Manager and inform them as to what happened and request that a driver (neutral 3rd party if possible) come to accompany the violator(s) back to the office or home.
- Request that another foreman/supervisor be sent out to run the job if applicable (there are other employees not in violation). Superintendent or other management must remain onsite until a replacement foreman arrives. On jobs that are a considerable distance out of town, and if management personnel are not qualified to run the job, the employees shall be taken back to the motel until replacement foreman arrives.
- Inform foreman and violator(s) that they have been placed on immediate suspension.
- Violator(s) should not be allowed back onto roof/working surface after being informed of suspension. Violator(s) should not be left alone after suspension to prevent possible fraudulent injury claims.
- Arrange to have someone gather employee's tools and bring them to employee(s).
- Collect all safety gear or other equipment the company has issued to employee.
- If at an out-of-town location, the driver (neutral 3rd party If possible) shall accompany the employee(s) to the motel to gather their personal belongings.
- Driver shall take employee(s) back to office or home.
- If employee(s) becomes confrontational or abusive call the superintendent, PM or Human Resources for help to arrange for alternate transportation for violator(s).
- If employee becomes confrontational or abusive call the superintendent, PM or Human Resources for help to arrange for alternate transportation for violator.

# Q. HAZARD COMMUNICATIONS PLAN

### Company Policy

To ensure that information about the dangers of hazardous chemicals used by Kodiak is known by all affected employees, the following hazardous information program has been established. Under this program, you will be informed of the contents of the OSHA Hazard Communications standard which includes elements of the Globally Harmonized System of Classification and Labelling of Chemicals GHS, the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency. All employees of this company will participate in this program. Copies of this Hazard Communication Plan are available from the Safety Director's office for review by any interested employee.

David Nash (Safety Director) is the program administrator, with overall responsibilities for this program, including reviewing and updating this plan as necessary.

### Container Labeling

Job foreman/superintendents will verify that all containers received for use will:

- be clearly labeled as to the contents,
- note the appropriate hazard warning,
- list the manufacture's name and address.
- Under no circumstances shall chemicals be received from suppliers or distributors that are not clearly labeled.

The job foreman or supervisors in each department will ensure that all secondary containers are labeled with either an extra copy of the original manufacture's label or with labels marked with the identity and the appropriate hazard warning. For help with labeling contact the Safety Director. Employees are permitted to transfer chemicals to unlabeled containers under the following conditions:

- Chemical is used temporarily and disposed of properly or returned to the original labeled container before the shift ends.
- Employee transfers the chemical for his/her own use. Employees are forbidden to transfer chemicals into a temporary container for another employee's use.
- Temporary containers used for hazardous chemicals must be designed for that purpose.
- Employees are prohibited from using food/drinking containers as temporary containers for chemicals (i.e. water bottles, sport drink containers, soda cans, milk bottles etc.).

The Safety Director will review the company labeling procedures yearly and will update labels as required following the requirements of the GHS (Globally Harmonized System of Classification and Labeling of Chemicals).

### Safety Data Sheets (SDS)

The Safety Director is responsible for establishing and monitoring Kodiak's SDS program. He/she will ensure that procedures are developed to obtain the necessary SDS and will review incoming SDS for new or significant health and safety information. He/she will see that any new information is

communicated to affected employees. The following procedure will be followed when an SDS is not received at the time of initial shipment:

- A list of all hazardous chemicals will be maintained by the Kodiak Safety Director
- The project manager shall contact the appropriate manufacture and request a copy of the SDS for identified chemical.
- Or he/she shall go online to the manufacture's website to obtain a copy of the identified SDS

Copies of SDS for all hazardous chemicals to which Kodiak employees are exposed or are potentially exposed will be obtained and kept in the Safety Director's office, warehouse, the job foreman pack, or at the general contractor's trailer. Paper copies or electronic copies of SDS will be readily available to all employees during their work shift. If a copy of an SDS is not available, contact your immediate supervisor or the Safety Director.

When revised copies of SDS are received the old copies shall be destroyed and the new copies inserted into the applicable job foreman's pack and the SDS binders at the Safety Director's Office.

## Employee Training and Information

The Safety Director is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work. Each new employee will attend a health and safety orientation that includes the following information and training.

- An overview of the OSHA hazard communication standard including the GHS (Globally Harmonized System of Classification and Labeling of Chemicals).
- The hazardous chemicals present at the employees work area/jobsites
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent the exposure to hazardous chemicals using control procedures, work practices and personal protective equipment (PPE).
- Steps Kodiak has taken to reduce or prevent exposure to the hazardous chemicals.
- Procedures to follow if employees are overexposed to hazardous chemicals.
- How to read labels and SDS to obtain hazard information as required by the GHS (Globally Harmonized System of Classification and Labeling of Chemicals).
- Location of the SDS file and written Hazard Communication program.

Prior to introducing a new chemical hazard into any department of this company, each employee in that department will be given information and training as outlined above for the new chemical hazard through:

- Safety/Training tailgate meetings
- or classroom instruction
- or Audio-visual instruction

## Hazardous Non-Routine Tasks

Kodiak employees are not required to perform non-routine tasks that are hazardous. Employees shall be trained in all aspects of routine tasks that they perform to prevent potential hazards. Employees are forbidden to perform hazardous tasks without proper training.

## Chemicals in Unlabeled Pipes

Work Activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact the Safety Director for information regarding:

- The chemical in the pipes
- Potential hazards
- Required safety precautions

## Informing Other Employers/Contractors

It is the responsibility of the Safety Director to provide other employers and contractors with information about hazardous chemicals their employees may be exposed to on a job site and suggested precautions for employees.

It is the responsibility of the Safety Director to obtain information about hazardous chemicals used by other employers to which Kodiak employees may be exposed.

Kodiak shall maintain a list of hazardous chemicals that are used on each job-site/project. This list shall be made available to the owner, general contractor, subcontractor and/or employer who may have employees that may be exposed to these chemicals while working on the same job-site/project.

Other employers and contractors will be provided SDS for hazardous chemicals generated by Kodiak operations in the following manner:

- Paper and electronic (CD) copies of the IIPP and SDS will be emailed or hand delivered to the General Contractor prior to Kodiak beginning work at each job site.
- The job foreman/superintendent shall maintain applicable copies of SDS's in the onsite job foreman's pack.
- The Safety Director will request any pertinent SDS or hazardous chemicals list from the General Contractor or other trade partners who may be using hazardous chemicals which may potentially impact Kodiak personnel prior to Kodiak beginning work onsite.

## Program Availability

A paper or electronic copy of this program will be made available, upon request, to General Contractors, Clients and Kodiak employees and their representatives. Copies may be requested from a member of Kodiak's safety team.

# R. COVID-19 PREVENTION PLAN (CPP)

This CPP has been created and implemented to prevent and/or control exposures to the SARS-CoV-2 (COVID-19) virus that may occur in all Kodiak facilities and Kodiak staffed jobsites.

**Date of last revision**: 06/18/2021

## Authority and Responsibly

The Kodiak Safety Director, David Nash, has the overall authority and responsibility for implementing the provisions of this CPP in all Kodiak workplaces. In addition, all Kodiak managers and supervisors are responsible for implementing and maintaining this CPP in the workplaces/jobsites they have responsibility for. This includes ensuring the employee questions and concerns regarding this CPP are addressed in the language they understand.

All Kodiak employees are responsible for following the provisions and directives contained in this CPP and to follow all safety policies and procedures that will maintain a safe work environment.

## Identification and Evaluation of Covid-19 Hazards

The following have been implemented in our workplaces/jobsites:

- Conduct workplace specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate potential workplace exposures to all Kodiak employees, vendors or others who may enter Kodiak workplaces/jobsite work areas.
- Review and implement applicable orders and industry specific guidance from the States and counties of California and Nevada, Cal-OSHA, Nevada OSHA, Federal OSHA, Centers for Disease Control (CDC) and any applicable local ordinances and directives related to COVID-19 hazards and prevention on a regular basis.
- Evaluate existing COVID-19 prevention controls at Kodiak workplaces/jobsites and implement changes, additions, or modifications as necessary.
- Conduct periodic inspections using **Appendix B: COVID-19 Inspection** form as needed to identify unhealthy conditions, work practices and procedures to ensure compliance with this CPP's provisions.

## Employee Participation

Kodiak employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

Informing their immediate supervisor and/or a member of the Kodiak safety team when COVID-19 hazards are discovered in their assigned work areas.

## Employee Screening

Kodiak employees are expected to self-screen per CDC guidelines before coming to work. Self-screening consists of monitoring their health daily for the following symptoms:

- Fever or chills

- Cough
- Difficulty Breathing / Shortness of breath
- Fatigue
- Muscle or Body Aches
- Headache
- New loss of taste or smell
- Sore Throat
- Congestion or Runny nose
- Nausea or vomiting
- Diarrhea

Kodiak employees who are experiencing ***any*** of the above symptoms must stay home and self-isolate. Employees shall call their immediate supervisor/manager and/or a member of the Kodiak safety team to report any symptoms they are experiencing as soon as possible. Kodiak employees who experience any of these symptoms while at work, must immediately inform their supervisor/manager and go home to self-isolate. Supervisors/Managers and/or safety team members who receive communications from a Kodiak employee experiencing any COVID-19 symptoms shall contact HR immediately. HR will contact the symptomatic employee to follow-up and to ensure compliance with the provisions and procedures of this CPP.

Kodiak has implemented COVID-19 health attestation questions on Kodiak's Link HCM time-keeping platform in compliance of state requirements to assist in monitoring the health changes of Kodiak personnel.

Kodiak employees or others who may be experiencing any of the following symptoms, must seek emergency medical care immediately:

- Trouble breathing
- Persistent chest pain or pressure
- New confusion
- Inability to wake or stay awake
- Bluish Lips or face

## Covid-19 Hazard Correction

Unsafe or unhealthy work conditions, practices and/or procedures will be documented on the **Appendix B: COVID-19 Inspection** form and corrected in a timely manner based upon the severity of the hazards as follows:

- Kodiak supervisors/managers are required to ensure all employees comply with the provisions of this CPP. Employee non-compliance, e.g. not wearing a face covering or not social distancing etc., shall be addressed immediately. Employees that are in violation shall immediately comply with management requests or shall be sent home for non-compliance. Non-compliant employees are subject to the elements of Kodiak's Disciplinary Action Plan.

- Damaged or missing engineering controls, e.g. physical barriers/partitions, ventilation etc., shall be corrected/repaired as soon as discovered. Kodiak employees must report damaged/missing engineering controls to their immediate supervisor and/or a member of the Kodiak safety team. Kodiak maintenance personnel or outside contractors will be assigned to repair/replace damaged or missing engineering controls. Every effort shall be made to correct the hazard in a timely manner. Kodiak employees working around damaged or missing engineering controls must be reassigned to work in an area that is protected until the damaged/missing controls are repaired or replaced.
- The Kodiak Safety team and management shall perform regular inspections of Kodiak's offices and Kodiak staffed jobsites to ensure compliance with this CPP.

## Control of Covid-19 Hazards

### Signage

Regulatory required signage shall be placed and maintained at each entrance/access door into Kodiak facilities. Signage must contain the following information in both English and Spanish:

- Prohibition of unauthorized personnel from entering facility
- Facial covering requirements
- Symptom Screening Information
- Facility rules for reducing potential exposures or transmission of COVID-19
- Management contact information

Additional signage shall be located throughout Kodiak facilities reminding employees of their obligations to:

- Wear a face covering
- Maintain social distancing of at least 6 feet
- Clean/sanitize their hands frequently
- Avoid close contact with others
- Clean frequently touched surfaces after use

## Social Distancing - 6 Feet or Greater

Where possible, Kodiak will ensure that employees will maintain at least six feet of social distance between each other in our workplace as needed by:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
- Limiting the number of persons in one area at a time.
- Prohibiting non-essential personnel from entering Kodiak facilities or staffed jobsites when possible
- Installing and maintaining visual cues such as signs and floor markings to indicate where employees and others should be located or to indicate their direction and path of travel.
- Staggering arrivals, departures, work, and break times.

- Adjusting work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- Staging materials and equipment outside of Kodiak facilities for pick-up and loading.

### Social Distancing – 6 Feet or Less

Kodiak employees will be kept as far apart as possible when there are situations where six feet of social distancing cannot be achieved.
In addition to wearing a face covering, a face shield will be worn by all Kodiak employees that must work together at less than 6 feet distance.

### Face Coverings

Kodiak will provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH), Center for Disease Control (CDC), local health department or other governmental regulatory entities.
The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible but at least 6' apart.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person will have alternatives, considered on a case-by-case basis in conjunction with the HR Department.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.
- Face shields used alone is prohibited as this practice is not recognized as an effective face covering
- The face covering must effectively control the breathing zone and restrain any expelled or exhaled water droplets within the covering.

### Engineering Controls

Kodiak has implemented the following measures when it is not feasible to maintain at least six feet between individuals:

- Installed plexiglass partitions between desks and counters to eliminate close contact. Plexiglass partitions do not eliminate the face covering requirements for individuals.
- All outside entrance or access doors at Kodiak facilities shall remain locked and closed or barricaded to prevent unauthorized access.

Kodiak has maximized, to the extent feasible, the quantity of outside air for Kodiak facilities with mechanical or natural ventilation systems by:

- Using fans to augment the circulation of indoor and outside air

- Opening roll-up doors and blocking access by visitors or unscreened employees

Ensure the ventilation system is in good operating condition through regular inspections and maintenance by our contracted vendors.

## Cleaning and Disinfecting

Kodiak has implemented the following cleaning and disinfection measures for frequently touched surfaces:

- Ensuring adequate supplies of cleaning products are available for employees
- Ensuring adequate time has been provided to allow for effective cleaning/sanitizing processes
- Informing Kodiak employees of the required frequency and scope of cleaning and disinfection.
- Increased the frequency of deep cleaning of Kodiak facilities by Kodiak's contracted cleaning company to a daily regimen with an emphasis on frequently occupied areas of the offices and bathroom/washing facilities
- Provide cleaning wipes, disinfectants, and cleaning/sanitizing chemicals, for cleaning tables, chairs and equipment in conference rooms, training rooms and break rooms
- Provide cleaning supplies/wipes for the operator compartments mobile equipment operators e.g. aerial, scissor and fork lifts.
- Sanitizing wipes provided at receptionist's desks, mailboxes, copiers, drinking fountains, and vending machines.
- Cleaning directions and procedures included with cleaning products.

Should Kodiak have a confirmed COVID-19 case in our workplace, the Kodiak safety team and/or management shall ensure that following additional procedures will be implemented:

- All surfaces, tools, equipment and materials that the infected person came in contact with will be cleaned and disinfected thoroughly using cleaners that are effective at killing the COVID-19 virus e.g. Sani Spray, Clorox Wipes and/or bleach/water solution.
- Employees that worked in the same general area as the confirmed positive individual will be removed from the area until the cleaning and sanitizing has been completed.

## Shared Tools, Equipment

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and hand tools must not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the users of said items.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

## Hand Sanitizing

Kodiak has implemented the following to ensure employees have access to effective handwashing facilities:

- Evaluates handwashing facilities for effectiveness.
- Determine the need for additional handwashing facilities.

- Encourage and allow adequate time for employee handwashing.
- Encourage employees to wash their hands for at least 20 seconds each time with soap and water.
- Provide employees with an effective hand sanitizer when hand washing facilities are not available, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Provided hand sanitizer dispensers at each entrance/exit to the Kodiak facilities.
- Provided and continues to provide personal sized bottles of hand sanitizer to all field employees as needed.

### Personal Protective Equipment (PPE)

Kodiak prohibits the sharing of PPE between employees. Kodiak employees with worn out, damaged or missing PPE shall contact a member of the Kodiak safety team and/or their immediate supervisor to obtain replacement PPE.

Kodiak continues to evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, 29 CFR 1910.132, Nevada OSHA and other regulatory agencies and provides such PPE as needed to ensure employee safety and protection from known hazards.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 and 29 CFR 1910.134 when the social distancing requirements are not feasible.

### Additional Controls

The following controls have been implemented to further prevent the spread of COVID-19 at Kodiak facilities and staffed jobsites:

- Carpooling is strongly discouraged for Kodiak employees. If you choose to carpool, the following must be observed:
    - Individuals must be separated as far apart as possible inside the vehicle
    - Face Coverings will be required to be properly worn for all individuals for the duration of the trip
    - Windows shall be opened enough to allow for fresh air circulation throughout the interior of the vehicle
    - All individuals shall wash/sanitize their hands immediately upon reaching their destination
- The sharing of motels rooms and/or apartments is prohibited.
- Company provided meals shall be individually wrapped/packaged.
- Employees are prohibited from sharing foods that come in common containers e.g. pizza, doughnuts, cake, cookies, candy bowls, etc.
- Extra chairs and tables shall be removed from conference rooms, training rooms and break rooms to allow for proper social distancing.
- In person meeting are limited to ten (10) or fewer attendees and attendees must maintain 6 feet of social distance throughout the meeting.
- Virtual meetings (Skype, WebEx, Zoom) will be held in lieu of in person meetings whenever possible.

## Personal Controls/Practices

Kodiak employees are encouraged to incorporate the following practices to help prevent the spread of COVID-19:

- Wash hands often especially after using the bathroom, before eating and after coughing, sneezing or blowing your nose.
- Avoid touching your mask/face covering.
- Do not shake hands.
- Avoid touching your eyes, nose, mouth.
- Avoid close contact with people who are sick.
- Stay home when you are sick or feeling sick.
- Follow local health department guidelines when not at work.
- Utilize the provided cleaning supplies to keeping your work areas, doorknobs, equipment and tools clean and sanitized.
- When accessing Kodiak facilities, only the user fobbing in is allowed into the building.
- Close or keep entrance/exit door closed behind you to prevent unauthorized personnel access.
- If you begin experiencing COVID-19 symptoms while at work, inform your supervisor and/or a member of the safety team immediately and go home.

## Investigating and Responding to Covid-19 Cases

Kodiak will utilize the **Appendix C: Investigating COVID-19 Cases** form or similar form to investigate all suspected and confirmed cases of COVID-19 that occur at Kodiak facilities or staffed jobsites. Employees who have potential COVID-19 exposure in our workplace will be:

- Informed of such potential exposure through emails, text messages or conversations with a member of the HR team.
- Offered COVID-19 at no cost. The time an employee spends being tested is considered compensable hours worked and must be recorded by clocking in/out in the timekeeping system. Mileage to and from the assigned testing clinic is reimbursable.
- Given information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to those exposed or who test positive for COVID-19.

## System for Communicating

Kodiak's goal is to ensure that effective two-way communication occurs with Kodiak employees, in a form they can readily understand. Employees should report COVID-19 symptoms and possible hazards to:

- Their immediate supervisor or,
- A member of the Kodiak Safety Team or,
- A member of the HR team.
- Employees can report symptoms and hazards without fear of reprisal.

Kodiak employees with medical or other conditions that put them at increased risk of severe COVID-19 illness shall be accommodated to the greatest extent possible by:

- Allowing remote work as their job description and duties allow.

- Working with their immediate supervisor and the Kodiak HR team to create/modify procedures that will allow for minimal or no contact with other employees or members of the public while they perform their assigned duties/tasks.

When testing is not required, employees can access COVID-19 testing through:

- Their personal medical provider.
- Community testing facilities that are advertised on the local health department websites.
- Urgent care facilities.

In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and Kodiak's HR team will inform affected employees of the reason for the testing and the possible results of a positive test.

- Required testing will be provided at no cost to the employee.
- The preferred testing center will be a Concentra Urgent Care facility closest to Kodiak's facilities, job sites or the employees place of residence.

Individuals in contact with our workplace who may be exposed to Covid-19 positive individual(s) will be contacted by a member of the HR team. The HR team member will explain the potential exposure and the process to get tested if the person desires. HR electronically sends a Cal-OSHA ETS COVID Testing form in which the employee can exercise their option to be tested or not be tested. Additionally, the person will be given information as to what is being done to control those hazards, and Kodiak's COVID-19 policies and procedures.
Communication will be accomplished through email, phone conversations, texts, Kodiak's Learning Management System, posted flyers and/or communications on Kodiak bulletin boards.

## Training and Instruction

Kodiak will provide effective training and instruction that includes:

- Kodiak's COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
    - COVID-19 is an infectious disease that can be spread through the air.
    - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
    - An infectious person may have no symptoms.
    - That particles containing the virus can travel more than six feet, especially indoors, so social distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- Methods of social distancing of at least six feet and the importance of combining social distancing with the wearing of face coverings.

- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

All training documentation will be maintained by the Kodiak Safety Team and will be made available to any government regulatory agency that through law has the authority to request such records.

## Multiple Covid-19 Infections and Covid-19 Outbreaks

In the event that Kodiak is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases at a Kodiak facility or any one staffed jobsite within a 14-day period, this section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

**COVID-19 testing**

We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period.

- COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
    - All employees in Kodiak's exposed workplace or staffed jobsite will be immediately tested and then tested again one week later.
    - Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
    - After the first two COVID-19 tests, Kodiak will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
    - Kodiak will provide additional testing when deemed necessary by Cal/OSHA.

## Exclusion of Covid-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.

- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever it has been demonstrated that the COVID-19 exposure is work related. This will be accomplished by:
    - Providing FFCRA Emergency Paid Sick Leave (EPSL) to individuals who have been exposed to or have contracted COVID-19 in Kodiak's workplace, as required by current regulations.
    - Follow California's Emergency Temporary Standards for continued pay an benefits, as required by regulations (California employees only).
    - Providing employees at the time of exclusion with information on available benefits.
    - Follow any current Federal, State or Local regulations as they relate to pay and benefits at the time the employee is exposed.

## Reporting, Recordkeeping, and Access

It is Kodiak's policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal-OSHA or Federal OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h) or 29 CFR 1904.39, of an employee occurring in Kodiak's place of employment or in connection with any Kodiak employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with California, Nevada and/or Federal Law.
- Provide Kodiak's written COVID-19 Prevention Program to employees, authorized employee representatives, and to representatives of Cal/OSHA, Nevada OSHA and/or Federal OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form or similar form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## Return-To-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
    - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
    - COVID-19 symptoms have improved.
    - At least 10 days have passed since COVID-19 symptoms first appeared.
    - COVID-19 individuals who tested positive, but never developed COVID-19 symptoms will not return to work until a minimum of 10 days has passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.

- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted.
    - If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
- If an employee has been in close contact with someone who has COVID-19 and lives in the same household, they must quarantine for 24 days from the start of that person's symptoms or date of that person's positive test was taken.

## Vaccines and Vaccinated Individuals

There are currently three vaccines that have been authorized for emergency use by the U.S. Food and Drug Administration FDA. Emergency Use Authorization Although Kodiak does not require Kodiak employees to be vaccinated, the CDC recommends and highly encourages everyone to get vaccinated.
A fully vaccinated person, regardless of age, is one who:

- has received both the first and second doses of the Moderna or Pfizer-BioNTech vaccines ***and*** two weeks have passed after the second dose was received, ***or***,
- has received the Johnson & Johnson/Janssen vaccine ***and*** two weeks have passed after receiving the vaccine.

*You are not considered vaccinated unless you meet the above criteria even if you have fully recovered after contracting and being diagnosed with COVID-19.*

Neither Kodiak nor the CDC recommend one vaccine over another as this is a personal choice. CDC Vaccines

The CDC has updated its guidance for fully vaccinated individuals on May 13, 2021 which applies to Kodiak Nevada operations. Additionally, Cal-OSHA has revised its COVID-19 Emergency Temporary Standard based upon guidance from the California Department of Public Health on June 17, 2021 which applies to all California operations. The following applies to Kodiak employees:

- Physical distancing requirement for all employees have been eliminated regardless of vaccination status in both Nevada and California unless Kodiak determines otherwise.
- The vaccination status of employees not wearing a mask indoors, working in Kodiak California facilities/projects, must be documented by Kodiak.

Based upon the updated guidance, the following will apply to all **fully vaccinated** employees working at a Kodiak owned facilities and Kodiak staffed jobsites:

- Employees may work without a face covering/mask
- Employees can resume activities that were allowed prior to the pandemic.
- Employee travel within the United States of America does not require testing before or after travel or self-quarantine after travel.
- Travel to international destinations will require employees to follow the destination country's rules and regulations.
- Travel from an International destination to the United States of America does require proof of a negative COVID-19 test or documentation of recovery from COVID-19 before returning to the U.S.

(Employees are encouraged to get a COVID-19 test three to five days after returning from an international destination)

- Kodiak employees do not need to isolate or get tested after contact with another person who has COVID-19 unless the fully vaccinated employee has any COVID-19 symptoms.
- Kodiak employees shall continually monitor themselves for COVID-19 symptoms and shall self-isolate if COVID-19 symptoms present themselves (testing is recommended).

If you "**have not"** been vaccinated, you must follow CDC and/or Cal-OSHA guidelines and the Kodiak protocols that have been in place throughout the pandemic by:

- Continuing to wear a mask when indoors,
- washing/ sanitizing your hands frequently
- stay or go home when feeling ill and report any Covid-19 symptoms to your supervisor immediately
- if sharing a hotel/motel room overnight or carpooling, you must continue to wear a face covering/mask
- you may request an N95 respirator for voluntary use while at work without exception

Kodiak employees must follow these and/or any protocols that have been established on Kodiak staffed jobsites by the General Contractor or controlling client whichever are more stringent. Each of the preceding protocols and guidelines are subject to change or modification based upon government recommendations or mandates and/or employer policies during outbreaks or other specific events or conditions.

# S. ASBESTOS EXPOSURE/MANAGEMENT PLAN

## Introduction

The Environmental Protection Agency (EPA) recommends an in-place management program for existing asbestos containing materials (ACM) in buildings. The asbestos safety plan serves to ensure that the day-to-day management and use of the building minimizes the release of asbestos fibers into the air, and ensures that when asbestos fibers are released, either accidentally or intentionally, proper control and clean-up procedures are implemented.

The presence of asbestos in buildings does not mean that the health of the building occupants is endangered. When in good condition and undisturbed, ACMs do not pose a health risk to building occupants. Damaged ACMs or unauthorized or uncontrolled disturbance of ACMs may release asbestos fibers into the air. Studies have shown that individuals exposed to asbestos fibers over a long period of time have developed lung cancer, asbestosis, and mesothelioma with latency periods ranging from 10 to 40 years.

## Regulations

29 CFR 1910.134: OSHA RESPIRATORY PROTECTION STANDARD
29 CFR 1926:1001: ASBESTOS STANDARD
29 CFR 1926.1101: ASBESTOS IN CONSTRUCTION STANDARD
40 CFR 61: EPA NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP)
40 CFR 763: EPA ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA)

## Designated Person

Kodiak Roofing and Waterproofing recognizes the Safety Director and Safety Managers, as the "Designated Person". The responsibilities of the Designated Person include:

1. Ensure that the activities of any person who performs inspections or re-inspections, develops or updates safety plans, or develops or implements response actions, including operations and maintenance, are carried out in accordance with applicable federal and/or state regulations to include meeting minimum training and licensing requirements.
2. Ensure that all Roofing and maintenance employees are properly trained regarding asbestos issues, as required by applicable federal and/or state regulations.
3. Ensure that short-term workers who may come in contact with asbestos in a building are provided information regarding the locations for ACM and presumed asbestos containing material PACM.
4. Ensure that warning labels are posted in accordance with applicable federal and/or state regulations.

## Competent Person

Kodiak Roofing and Waterproofing recognizes the Site Foreman and Superintendents, as the "Competent Person". The responsibilities of the Competent Person include:

1. Be capable of identifying existing asbestos hazards in the workplace, selecting the appropriate control strategy for asbestos exposure, and have the authority to take prompt corrective

measures to eliminate them.

## Training

Minimum training requirements for selected staff is provided as follows:

1. Roofing/maintenance staff likely to come into contact with ACMs shall attend a 4-hour asbestos awareness training course. Training sessions may be scheduled as needed by roofing or service staff.
2. Kodiak Roofing and Waterproofing personnel performing asbestos work shall enroll in and comply with the requirements of the Kodiak Respiratory Protection Program.

Training is to be documented and appropriate records, including certificates, are to be kept by the Designated Person.

## Definitions and Descriptions

*Accessible* – when referring to ACM means that the material is subject to disturbance by building occupants or roofing or maintenance personnel in the course of their normal activities.

*Accredited or Accreditation* – when referring to a person or laboratory means that such person or laboratory is accredited in accordance with AHERA rules.

*Air erosion* – the passage of air over friable ACM which may result in the release of asbestos fibers.

*Asbestos* – includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, actinolite, and any of these minerals that has been chemically treated and/or altered.

*Asbestos-containing materials (ACM)* – any material that contains more than 1% asbestos.

*Asbestos debris* – pieces of ACM that can be identified by color, texture, or composition, or means dust, if the dust is determined by an accredited inspector to be ACM.

*Category I ACM* – ACM packings, gaskets, resilient floor covering, and asphalt roofing products.

*Category II ACM* – ACM, excluding Category I non-friable ACM, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

*Demolition* – the wrecking or taking out of any load-supporting structural member and any related razing, removing, or stripping of products.

*Disturbance* – activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM. This term includes activities that disrupt the matrix of ACM or PACM, render ACM or PACM friable, or generate visible debris. Disturbance includes cutting away small amounts of ACM or PACM, no greater than the amount, which can be contained in one standard sized glove bag or waste bag in order to access a building component. In no event shall the amount of

PACM or ACM so disturbed exceed that which can be contained in one glove bag or waste bag which shall not exceed 60 inches in length and width.

*Encapsulation* – the treatment of ACM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).

*Enclosure* – an airtight, impermeable, permanent barrier around ACM to prevent the release of asbestos fibers into the air.

*Fiber* – a particulate form of asbestos, 5 microns or longer, with a length-to-diameter ratio of at least 3:1

*Fiber Release Episode* – any uncontrolled or unintentional disturbance of ACM resulting in visible emission.

*Friable ACM* – any ACM that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure (including non-friable ACMs that have been rendered friable).

*Functional space* – a room, group of rooms, or homogeneous area (including crawlspaces or the space between a dropped ceiling and the floor or roof deck above), such as classrooms, a cafeteria, gymnasium, hallway, designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.

*Homogeneous Area* – an area of surfacing material, thermal system insulation, or miscellaneous material that is uniform in color and texture.

*Non-Friable ACM* – any ACM that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

*Operations and Maintenance Program* – a program of work practices to maintain friable ACM in good condition, ensure clean-up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACM disturbance or damage.

*PACM* – presumed asbestos containing material; laboratory analysis is required to confirm the absence of asbestos in the material.

*Preventative measures* – actions taken to reduce disturbance of ACM or otherwise eliminate the reasonable likelihood of the materials becoming damaged or significantly damaged.

*Regulated ACM* – friable ACM, Category I non-friable ACM that has become friable, Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to

powder by the forces expected to act on the material in the course of demolition or renovation operations.

*Removal* – the taking out or stripping of substantially all ACM from a damaged area, a functional space, or a homogeneous area in a building.

*Renovation* – altering a facility or one or more facility components in any way, including the stripping or removal of ACM from a facility component.

*Repair* – returning damaged ACM to an undamaged condition or to an intact state so as to prevent fiber release.

*Response action* – a method, including removal, encapsulation, enclosure, repair, operations and maintenance, that protects human health and the environment from friable ACM.

*Routine maintenance area* – an area, such as a boiler room or mechanical room that is not normally frequented by occupants and in which maintenance employees or contract workers regularly conduct maintenance activities.

*Vibration* – the periodic motion of friable ACM, which may result in the release of asbestos fibers.

## Operations Procedures for ACM

*General Requirements:*

1. Asbestos abatement, lead mitigation and other hazardous materials mitigation work will be coordinated with and integrated into the planned renovation project for this property.
2. All removal or disturbance of hazardous materials includes transportation and final disposal of generated waste materials to an approved landfill compliant with statutory regulations relating to hazardous waste.
3. Kodiak may conduct additional assessment as needed to further define asbestos and lead issues at the project site. If discrepancies exist within the scope of work regarding the location or quantities of ACM or LBP found during site work, additional testing or assessment may be necessary to resolve these conflicts.
4. Kodiak acknowledges that it has investigated and satisfied itself as to: a) the conditions affecting the work, including but not limited to physical conditions of the site which may bear upon site access, handling and storage of tools and materials,
5. All work shall be performed in strict accordance with all applicable Federal, State, and Local regulations, standards and codes governing demolition, asbestos abatement and any other trades.
6. Safety shall be the first and primary goal guiding the work on this project.

*Asbestos Roofing Removal Procedures*

1. Contractor shall remove all designated asbestos roofing materials using proper wet methods

and housekeeping techniques which are detailed in applicable Federal and State regulations.

2. Asbestos material shall be adequately wet at all times and shall not be allowed to accumulate on the roof surface. Avoid causing water damage to the building when using water.
3. Contractor shall not saw, sand, chip, grind, abrade, or drill asbestos roofing materials during removal activities. Whenever possible, asbestos materials shall be removed in large sections with minimal breakage or disturbance.
4. As work is to be conducted outdoors, an exclusion zone shall be established using fencing, caution tape, barricades, or similar methods to establish a perimeter which will exclude the public and unauthorized personnel from entering the work area. This should extend at least 20' from the work area if possible.
5. Abatement contractor shall post caution signs meeting the specifications of OSHA at any location and approaches to a location where airborne concentration of asbestos may exceed ambient background levels. Signs shall be posted at a distance sufficiently far enough away from the work area to permit an employee to read the sign and take the necessary protective measures to avoid exposure. Additional signs may need to be posted following construction of workplace enclosure barriers.
6. Ground surfaces around the work areas where significant removal work or waste loading is required shall be covered with 6-mil polyethylene sheeting and affixed to the edges of the building to protect the perimeter areas.
7. Seal off all nearby windows, vents, doorways, drains, ducts, grills, grates, diffusers, skylights and any other openings located in close proximity to the areas of proposed abatement with 6-mil polyethylene sheeting and tape.
8. Pre-clean and prepare the work area in accordance with current standards.
9. Wet all asbestos containing material with an amended water solution using equipment capable of providing a fine spray mist in order to reduce airborne fiber concentrations when the material is disturbed. Saturate the material to the substrate, however, do not allow excessive water to accumulate in the work area. Keep all removed material wet enough to prevent fiber release until it can be containerized for disposal.
10. Saturated asbestos containing material shall be removed in manageable sections. Removed material should be containerized (bagged or wrapped, etc.) before moving to a new location for continuance of work. Surrounding areas shall be periodically sprayed and maintained in a wet condition until visible material is cleaned up.
11. All removal work shall be conducted using hand tools (knives, scrapers, pry-bars, hatchets, etc.). No mechanical means shall be used unless appropriate HEPA vacuum attachments are provided to prevent asbestos fiber emissions. This includes a prohibition on radial saws or similar mechanical cutting tools unless HEPA filtration is provided.
12. Material removed shall not be dropped or thrown to the floor or ground. Material should be removed as intact sections or components whenever possible and bagged or containerized. All waste must be bagged and carefully lowered to the ground using slide, pully system, man-lift or similar method. The waste bags may be cleaned and carried down by hand using the stairs or service elevator with approval of the client. Cleanup of removed material shall be continuous. Contractor shall carefully lower containerized roofing materials from the roof to the on-site storage/transportation container in a manner that prevents loss of asbestos materials onto the ground or into the atmosphere.

13. Containers (6 mil polyethylene bags or drums) shall be sealed when full (Wet material can be exceedingly heavy). Double bagging of waste material is necessary. Bags shall not be overfilled. They should be securely sealed to prevent accidental opening and leakage by tying tops of bags in an overhand knot or by taping in gooseneck fashion. Do not seal bags with wire or cord. Bags may be placed in a locked storage area or DOT approved container within the contractor's designated staging area until ready for transportation to the landfill. Bags shall be decontaminated on exterior surfaces by wet cleaning and HEPA vacuuming before being placed in an appropriate waste bin which can be sealed and locked.
14. Bags shall be clear poly to enable a visual inspection to confirm adequate wetness of removed materials.
15. Large components removed intact may be wrapped in 2 layers of 6-mil polyethylene sheeting secured with tape for transport to the landfill.
16. After completion of all removal work, surfaces from which asbestos containing materials have been removed shall be wet brushed and sponged or cleaned by some equivalent method to remove all visible residues.
17. Clean up shall proceed in accordance with this specification using HEPA vacuums and damp wiping procedures. Decontaminate all tools and equipment and remove at the appropriate time in the cleaning sequence.
18. After the work area has been rendered free of visible residues, a thin coat of a satisfactory encapsulating agent shall be applied to all surfaces in the work area to seal in non-visible residue.
19. Worker decontamination shall be provided on site where workers will enter or exit the work area. One decontamination area for each work area is required. This area may consist of a contained area near the roof access point where plastic sheeting is used to protect ground surfaces and nearby surfaces from tools, equipment, suits and other items used in the project. As all abatement work is to be conducted outdoors, the decontamination system does not have to consist of an enclosed, negative pressure containment with shower, etc. as required for a Class I (friable) removal project.
20. The decontamination area shall be sufficiently large to use as a bag-out station and for storage of all waste materials.
21. Any washing or rinsing of asbestos contaminated equipment or materials must be conducted in a manner that will contain all wastewater. No water used for decontamination purposes shall be allowed to drain upon the surface of the site.
22. The waste containers shall be located away from the worker decontamination area. The bag-out station shall be located at the point nearest where the waste disposal containers are located. The waste bags shall be securely loaded off the roof using appropriate means, including a rope-and-pulley system, man-lift, hoist, covered chute or similar system to be approved prior to the commencement of abatement work.
23. Disposal of asbestos containing waste materials must comply with local and federal regulations.
24. The worker decontamination area may be used for waste bag-out purposes only with prior approval
25. Emergency exits from the roof shall be established and clearly marked with duct tape arrows or other effective designations to permit easy location from anywhere within the work area. They

shall be secured to prevent access from uncontaminated areas and still permit emergency exiting.

26. Visual inspections and clearance monitoring shall be performed as necessary to confirm proper removal and final approval of work. Abatement contractor shall conduct his own thorough and complete visual inspection of the work areas in advance of Owner's visual clearance inspection. Re-inspections following a failed visual inspection shall be completed as needed until the area passes clearance inspection.
27. Following the satisfactory completion of clearance monitoring remaining barriers may be removed and properly disposed. A final visual inspection shall insure that no contamination remains in the work area. Unsatisfactory conditions may require additional cleaning and air monitoring.
28. All other aspects of asbestos roofing removal work shall comply with all federal, state and local asbestos regulations.

## Waste Disposal Procedures

1. Disposal must occur at the authorized landfill in accordance with regulatory requirements of NESHAP and applicable State and Local guidelines and regulations
2. Clear and legible copies of all dump receipts, trip tickets, transportation manifests or other documentation of disposal shall be continuously maintained in a designated jobsite file, in chronological order, until the end of the job, when they shall be included in the Closeout Book.

## Transportation to Landfill

1. Once bags have been removed from the work area, they shall be loaded into an enclosed truck for transportation.
2. When moving containers, utilize hand trucks, carts and proper lifting techniques to avoid back injuries.
3. The enclosed cargo area of the truck shall be free of debris and lined with 6 mil polyethylene sheeting to prevent contamination from leaking or spilled containers. Floor sheeting shall be installed first and extend up the sidewalls. Wall sheeting shall be overlapped and taped into place.
4. Personnel loading asbestos-containing waste shall be protected by disposable clothing including head, body and foot protection and at a minimum, half-face piece, air-purifying, dual cartridge/respirators equipped with high efficiency filters.
5. Any debris or residue observed on containers or surfaces outside of the work area resulting from clean up or disposal activities shall be immediately cleaned using HEPA filtered vacuum equipment and/or wet methods as appropriate.
6. Large metal dumpsters are sometimes used for asbestos waste disposal. These should have doors or tops that can be closed and locked to prevent vandalism or other disturbance of the bagged asbestos debris and wind dispersion of asbestos fibers. Unbagged material shall not be placed in these containers, nor shall they be used for non-asbestos waste. Bags shall be placed, not thrown, into these containers to avoid splitting.

## Final Inspection

A final inspection shall be performed in and around the designated work area by a competent person prior to formal release to roofing installation process.

# T. SILICA EXPOSURE CONTROL PLAN

## Introduction

Silica refers to the chemical compound silicon dioxide (SiO2), the most common form of which is quartz. Sand, a key component in many building products such as mortar, clay and concrete tiles or pavers, and brick, is mainly composed of silica in the form of quartz.

Silica can present a danger to construction workers when these building materials are cut, drilled or ground using powered equipment and abrasive blades, drills or other equipment, resulting in dust containing tiny particles of silica, known as Respirable Crystalline Silica (RCS). These particles are small enough to penetrate to the gas exchange area of the lungs; larger particles cannot travel as deep into the lungs and are purged by natural actions of the body. Respirable particles remain in the lungs and cause permanent scarring of lung tissue, making breathing increasingly more difficult—an occupational disease known as silicosis that often does not manifest until many years after exposure. According to the American Lung Association, silicosis also increases the risk of other lung issues, such as tuberculosis, lung cancer and chronic bronchitis.

The U.S. Occupational Safety and Health Administration (OSHA) and California OSHA have published new rules regarding worker exposure to RCS in construction. **29 CFR §1926.1153** and **CCR T8 §1532.3**

In accordance with FED OSHA and Cal-OSHA construction silica regulations CFR , Kodiak has developed the following written exposure control plan to identify the hazards our workers may be exposed to and the means our company has established to control those hazards, ensuring the safety of our workers and others in proximity to our job sites. Although RCS exposures are minimal in the majority of roofing work and the risk of contracting silicosis is low, RCS is a serious danger that can cause permanent damage, and it is critical for all supervisors and workers to follow the control practices set out in this plan.

## Scope and Description of Tasks

The OSHA regulation applies to all exposures to RCS in construction workplaces except those where worker exposures will remain below 25 micrograms per cubic meter of air as an eight-hour time-weighted average (TWA) under any foreseeable conditions.

Following are specific tasks a worker for Kodiak may perform that could involve exposure to silica, quartz or sand (not necessarily RCS). These tasks were determined based on information found in manufacturers' safety data sheets (SDSs) for products being used or installed, as well as company and industry sampling of commonly encountered roofing and building products.

- Abrasive, powered cutting of concrete or clay tile or pavers
- Grinding of mortar joints or masonry for counterflashing or tuckpointing with powered tools equipped with abrasive blades
- Removal and installation of asphalt roofing products such as built-up, polymer-modified bitumen and shingle roof systems
- Removal or installation of gravel surfacing material on roof systems
- Drilling or screwing into concrete, masonry or mortar for installation of termination bars, fasteners or other accessories

With worker input, Kodiak's management and supervisors will review this list of tasks at least once a year and supplement or revise it to properly describe tasks that may involve silica, quartz or sand or could

result in exposure to RCS. This review will use industry sources of silica information, company sampling and testing, and government agency and third-party research and publications to determine additional sources of RCS exposure that initially may not have been identified.

Prior to the start of any project, company supervisors and safety staff will analyze the tasks to be performed on the project and determine whether any of those tasks fall into one of the categories listed above or might involve an exposure to RCS that has not been identified previously. In performing the hazard analysis, a preliminary determination also will be made by company supervisors and safety staff regarding any possible exposure to RCS from sources outside our company's control as well as potential exposures to third parties who may be affected by our company operations. Hazards identified will be addressed by company staff in consultation with third-party entities if applicable and procedures to control those hazards will be incorporated into this plan.

Any identified task that exposes—or reasonably is expected to expose—company workers to RCS at or above the action level requires company supervisors and safety personnel to assess the nature of the exposure by air monitoring or objective data comparison sufficient to characterize the exposure.

## Limiting Worker Exposures to RCS

Although most tasks performed by workers at Kodiak will not expose workers to harmful levels of RCS, two categories of tasks described by OSHA in Table 1 of either **29 CFR §1926.1153(c)(1)** or **CCR T8 §1532.3(c)(1)** as applicable may be performed by our workers. When our workers are using hand-held power saws or hand-held grinders for mortar removal, as described in Table 1, our workers will follow the engineering and work practice control methods and wear the required respiratory protection described in each provision as applicable unless such controls are not feasible.

a. If, while performing tasks described in paragraph A, workers do not fully implement the engineering controls, work practices and respiratory protection described in Table 1, our company will ensure no worker is exposed to RCS in an amount that exceeds the permissible exposure limit (PEL) of 50 micrograms per cubic meter of air as an eight-hour TWA. In addition, our company will analyze air monitoring data or objective data sufficient to accurately characterize worker exposures to RCS.

   Alternatively, our company will perform initial monitoring to assess the eight-hour TWA exposure for each worker on the basis of one or more personal breathing zone air samples that reflect the exposures of workers on each shift, for each job classification, in each work area. Where several workers perform the same tasks on the same shift and in the same work area, our company will sample a representative fraction of these workers to meet this requirement. In representative sampling, our company will sample the worker(s) who are expected to have the highest exposure to RCS.

   If initial monitoring indicates worker exposures are below the action level, we will discontinue monitoring for those workers whose exposures are represented by such monitoring.

   Where the most recent exposure monitoring indicates worker exposures are at or above the action level but at or below the PEL, our company will repeat such monitoring within six months of the most recent monitoring. Where the most recent exposure monitoring indicates worker exposures are above the PEL, our company will repeat such monitoring within three months of the most recent monitoring.

Where the most recent (noninitial) exposure monitoring indicates worker exposures are below the action level, our company will repeat such monitoring within six months of the most recent monitoring until two consecutive measurements, taken seven or more days apart, are below the action level, at which time we will discontinue monitoring for those workers whose exposures are represented by such monitoring, except as otherwise provided under "Reassessment of exposures" below.

Reassessment of exposures: Our company will reassess exposures whenever a change in the production, process, control equipment, personnel or work practices may reasonably be expected to result in new or additional exposures at or above the action level or when we have any reason to believe new or additional exposures at or above the action level have occurred.

Methods of sample analysis: Our company will ensure all samples taken to satisfy the monitoring requirements are evaluated by a laboratory that analyzes air samples for RCS in accordance with the procedures in Appendix A of either **29 CFR §1926.1153** and **CCR T8 §1532.3** as applicable.

Worker notification of assessment results: Within five working days after completing an exposure assessment, our company will individually notify each affected worker in writing of the results of the assessment or post the results in an appropriate location accessible to all affected workers. Whenever an exposure assessment indicates that a worker exposure is above the PEL, our company will describe in the written notification the corrective action being taken to reduce worker exposure to or below the PEL.

Observation of monitoring: Where air monitoring is performed to comply with the requirements of this section, our company will provide affected workers or their designated representatives an opportunity to observe any monitoring of worker exposure to RCS. When observation of monitoring requires entry into an area where the use of protective clothing or equipment is required for any workplace hazard, our company will provide the observer with protective clothing and equipment at no cost and ensure the observer uses such clothing and equipment.

b. Procedures described in paragraph B also will be applied to tasks not listed in Table 1 of either **29 CFR §1926.1153(c)(1)** or **CCR T8 §1532.3** that may involve exposure to silica, quartz or sand as determined by information found in applicable manufacturers' SDSs for products found in the workplace.

c. Methods of compliance:

Engineering and work practice controls: Our company will use engineering and work practice controls to reduce and maintain worker exposure to RCS at or below the PEL unless we demonstrate such controls are not feasible. Wherever such feasible engineering and work practice controls are not sufficient to reduce worker exposure to or below the PEL, we will nonetheless use them to reduce worker exposure to the lowest feasible level and supplement them with the use of respiratory protection that complies with the requirements of paragraph E below.

d. Respiratory protection, general:

Where respiratory protection is required under our company program or **29 CFR §1926.1153** and **CCR T8 §1532.3** as applicable, our company will provide each worker an appropriate respirator that complies with the requirements of this paragraph and **29 CFR §1910.134** or **CCR T8 §5144**. Respiratory protection is required:

- Where specified by Table 1 of **29 CFR §1926.1153** or **CCR T8 §1532.3**
- For tasks not listed in Table 1 or where the engineering controls, work practices and respiratory protection described in Table 1 are not fully and properly implemented:
    - Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls
    - Where exposures exceed the PEL during tasks, such as certain maintenance and repair tasks, for which engineering and work practice controls are not feasible
    - During tasks for which our company has implemented all feasible engineering and work practice controls and such controls are not sufficient to reduce exposures to or below the PEL.

Respiratory protection program: Where respirator use is required by **29 CFR §1926.1153** or **CCR T8 § 1532.3**, our company's respiratory protection program developed under either **29 CFR §1910.134** or **CCR T8 §5144** as appropriate will apply.

## Housekeeping Measures

Compressed air may not be used to clean worker clothing or surfaces if it could contribute to worker exposure to RCS. It may be used if no other method is feasible or if a ventilation system is used to capture the resulting dust cloud.

The use of leaf or debris blowers or dry sweeping or brushing of areas soiled by abrasive powered cutting or grinding of materials containing silica must be avoided if wet sweeping or HEPA-filtered vacuuming could be safely used to clean the areas.

Leaf or debris blowers may be required to clean roof surfaces if wet sweeping or HEPA-filtered vacuuming is not feasible on certain job sites for one or more of the following reasons:

- Slip, trip or fall hazards are created by wet surfaces
- Slip, trip or fall hazards are created by equipment power cords or hoses
- The new roof tile that has been installed will be permanently stained by such action
- Water intrusion may damage other building elements

In instances where wet sweeping or HEPA-filtered vacuuming is determined to be infeasible, Kodiak workers will wear disposable particulate respirators (filtering facepieces or dust masks) with a minimum assigned protection factor of 10 (APF 10) to reduce or eliminate potential exposure to RCS. The filtering facepiece must be worn during the cleaning operation and for such time thereafter until the dust cloud dissipates.

## Procedures to Restrict Access to RCS Work Areas

On projects where potential exposure to RCS exists, Kodiak workers will take the following steps to limit exposure to co-workers and third parties:

- On projects with ladder access to roof areas, the base area around the ladder will be flagged with warning lines and high-visibility signage will be posted stating, "Do Not Enter—Kodiak Workers Only." Ladder use by non-company employees is not allowed and will not be permitted.
- Only company workers needed to perform tasks in the area where potential exposure to RCS may occur will be permitted in that specific roof area.

- On projects where third parties may have shared access to roof areas where exposure to RCS may exist, company workers will use warning lines and place signage, as described above, to control third parties' access to those areas. If, because of the nature of the access, such as a common stairwell or exterior scaffold stairway, third parties can be denied access to the roof area, company workers will post the above signage on the roof level entry door or access point to restrict third party entry to the roof.

## Designation of RCS Competent Persons and Inspection Protocol

The following employees of Kodiak are designated "competent persons" for purposes of the OSHA silica regulation by virtue of each individual's knowledge of the hazards related to exposure to RCS, the control methods our company employs to control those hazards, and the authority granted to each to take corrective measures to reduce or eliminate RCS hazards to our workers:
David Nash – Kodiak Safety Director
Jesus Oliva – Kodiak Safety Manager
Keith Gurczynski – Safety Coordinator
Any one or all listed competent persons for RCS may inspect our job sites on a regular basis to assess the tasks being performed and the equipment and materials in place to ensure proper implementation of our company's written RCS exposure control plan. The competent person will note any deficiencies in the plan's implementation and discuss any required revisions with supervisory personnel. If any deficiency is significant enough to immediately affect the health and safety of company workers or others, the competent person has complete authority to stop work until the issue can be resolved. During the inspection process, the competent person also will be responsible for identifying exposures to RCS that may arise from unforeseen activity being performed by third-party entities unrelated to our company work. The competent person immediately will notify company supervisors and management to determine the necessity of action to protect exposed company workers. This may require outreach to those third-party entities as well as establishing additional protocols to maintain the safety of our workers. A dated, written record of all inspections hereunder, with a specific notation as to remedial action taken, if any, will be made by the competent person.

## Description of Company RCS Worker Training and Information

The hazards related to RCS have been included in company hazard communication training under 29 CFR §1910.1200. In addition, a specific training module in Kodiak's Bridge Learning Management System LMS, training module "Silica Hazards in Construction" is used for current workers and new hires that focuses on the following:

- Specific health hazards associated with RCS, including cancer dangers, lung or respiratory dangers, and immune system and kidney effects
- Roofing tasks or other common tasks that could result in RCS exposure
- Specific measures, including engineering controls, work practices and respirator use, that our company has implemented to protect our workers from RCS exposure
- The provisions of the OSHA construction RCS regulation
- The names of RCS competent persons designated by our company under Section 6 of this plan

- The purpose and description of our company medical surveillance program required by the OSHA rule and set out in Section 8 of this plan

The above module will be supplemented on a regular basis with RCS-specific toolbox talks; manufacturer or supplier materials addressing equipment, tools and products as they become available; OSHA training materials such as Quick Cards; In-house training and training offered by building owners, general contractors, and engineers or architects on specific projects.

### Description of Medical Surveillance for RCS Exposures

The medical surveillance provisions that our company will implement for RCS exposures is based on the requirements of either **29 CFR §1926.1153(h)** and **CCR T8 §1532.3(h)** as applicable and will include the following:

- Kodiak will make medical surveillance available at no cost to any company worker required to use a respirator for 30 days or more per year.
- All medical exams required under this provision of the plan must be conducted by a physician or other licensed health care professional (PLHCP).
- An initial, baseline medical examination will be made available to a worker within 30 days after an initial assignment unless the worker has had a similar examination within the past three years. The examination must consist of the following:
  - A medical work history with emphasis on past, present and anticipated exposures to RCS, dust and other agents affecting the respiratory system; any history of respiratory system dysfunction, including signs and symptoms of respiratory disease; history of tuberculosis; and smoking status and history
  - A physical examination with special emphasis on the respiratory system
  - A chest X-ray (a single posteroanterior radiographic projection or radiograph of the chest at full inspiration either recorded on film [no less than 14 x 17 inches and no more than 16 x 17 inches] or digital radiography systems), interpreted and classified according to the International Labor Office (ILO) International Classification of Radiographs of Pneumoconiosis by a NIOSH-certified B Reader
  - A pulmonary function test to include forced vital capacity (FVC) and forced expiratory volume in one second (FEV1) and FEV1/FVC ratio, administered by a spirometry technician with a current certificate from a NIOSH-approved spirometry course
  - Testing for latent tuberculosis infection
  - Any other tests deemed appropriate by the PLHCP
- Periodic examinations will be made available by our company every three years or more frequently as recommended by the PLHCP for affected workers. Examinations will include the elements described in (c) above.
- Additional protocols for information to be provided to the PLHCP, the PLHCP's written medical report to an employee and the PLHCP's written medical opinion to our company will follow **29 CFR §1926.1153(h)(4), (5) and (6)** or **CCR T8 §1532.3(h)(4), (5) and (6)** as applicable.
- If the PLHCP's written medical opinion indicates an employee should be examined by a specialist, our company will make available a medical examination by a specialist within 30 days after

receiving the PLHCP's written opinion. Our company will ensure the examining specialist is provided with all the information the company is obligated to provide to the PLHCP in accordance with **29 CFR §1926.1153(h)(4)** or **CCR T8 §1532.3(h)(4)** as applicable. Our company will ensure the specialist explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of the examination. The written report shall meet the requirements of **29 CFR §1926.1153(h)(5)** or **CCR T8 §1532.3(h)(5).**

## Recordkeeping

Records of our workers' personal breathing zone sampling to assess RCS exposure (employee exposure records) conducted on behalf of our company by third parties or those conducted by our staff will be maintained for a period of 30 years from the date of the record's initial creation. The initial record must include:

- The date of the measurement for each RCS sample taken
- The task monitored
- The sampling and analytical methods used
- The number, duration and results of the samples taken
- The identity of the laboratory that performed the analysis
- A description of any PPE worn by workers who were monitored
- The names, job classifications and social security numbers of workers sampled along with similar information for other workers present at the sampling location who performed similar tasks but were not sampled

This RCS exposure control plan is available for examination and copying by all employees who may be covered under the OSHA construction RCS regulation, their designated representatives, and officials of the U.S. Department of Labor or allied state agencies.

# U. WILDFIRE RESPIRATORY PROTECTION

### Introduction

This Respiratory Protection Program specifies standard operating procedures to protect all Kodiak employees from respiratory hazards, according to the requirements of Cal OSHA regulations. Respirators are to be used only where engineering control of respirable hazards are not feasible, while engineering controls are being installed, or in emergencies.

### Administrative Duties

At Kodiak, our Respiratory Protection Program Administrator is the Safety Director, David Nash. He is the person is solely responsible for all facets of the program and has full authority to make necessary decisions to ensure success of this program. His authority includes hiring personnel and purchasing equipment necessary to implement and operate the program. The Program Administrator will develop written detailed instructions covering each of the basic elements in this program, and is the sole person authorized to amend these instructions.

He is also qualified, by appropriate training and experience that is commensurate with the complexity of the program, to administer or oversee Kodiak's Respiratory Protection Program and conduct the required evaluations of program effectiveness.

Employees may review a copy of Kodiak's Respiratory Protection Program, which is available in the main office and online. Our Program Administrator, David Nash, reviews this program periodically to ensure its effectiveness. Only the Program Administrator may amend the written program.

### Health Effects of Wildfire Smoke

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

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

People over 65 and people who already have heart and lung problems are the most likely to suffer from serious health effects. The smallest and usually the most harmful particulate matter is called PM2.5 because it has a diameter of 2.5 micrometers or smaller.

### Air Quality Index (AQI)

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

The current AQI is divided into six categories as shown in the table below:

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

## Wildfire Smoke Hazards

***Identification of Harmful Exposures:***

Kodiak shall determine employee exposure to PM2.5 (Particulate Matter with a diameter of less than 2.5 micrometers) before each shift and periodically thereafter, as needed, by any of the following methods:

- Check AQI forecasts and the current AQI for PM2.5 from any of the following:
  - U.S. EPA AirNow website (airnow.gov)
  - U.S. Forest Service Wildland Air Quality Response Program Website (https://sites.google.com/firenet.gov/wfaqrp-external/home)
  - California Air Resources Board Website (https://ww2.arb.ca.gov/homepage)
  - Local air pollution control district website
  - Local air quality management district website
- Obtain AQI forecasts and the current AQI PM2.5 directly from the EPA, California Air Resources Board, local air pollution control district, or local air quality management district by telephone, email, text, or other effective method.
- Measure PM2.5 levels at the worksite and convert the PM2.5 levels to the corresponding AQI.
  - Kodiak may use a direct-reading particulate monitor to determine PM2.5 which complies with Appendix A to Section 5141.1 and shall select a monitor that:
    - Does not underestimate employee exposures to wildfire smoke.
    - May underestimate wildfire smoke exposures, but Kodiak shall obtain information on the possible error of the monitor from the manufacturer or other published literature and shall account for the error of the monitor when determining exposures to PM2.5 to ensure that employee exposure levels are not underestimated.
  - The monitor shall be designed and manufactured to measure the concentration of airborne particle sizes ranging from an aerodynamic diameter of 0.1 micrometers up to and including 2.5 micrometers. Kodiak may use a monitor that measures a particle size range beyond these limits but shall treat the results as the PM2.5 levels.

- Kodiak ensures that the monitor used is calibrated, maintained, and used, including the use of necessary accessories, in accordance with the manufacturer's instructions for accurately measuring PM2.5 concentrations.
- The person supervising, directing, or evaluating workplace monitoring for PM2.5 shall have the training or experience necessary to apply this section and to ensure the correct use of the monitor and the interpretation of the results, so that exposures are not underestimated.

## Communication

Kodiak has established and implemented a system for communicating wildfire smoke hazards, including provisions designed to encourage employees to inform our company of wildfire smoke hazards without fear of reprisal. The system includes:

Informing employees of the following during and/or following a wildfire by cell phone or in person:

- The current AQI for PM2.5
- Protective measures such as N95 respirators available to employees to reduce their wildfire smoke exposures.

Encouraging employees to inform Kodiak of the following:

- Worsening air quality
- Any adverse symptoms that may be the result of wildfire smoke exposure such as asthma attacks, difficulty breathing, and chest pain.

## Control of Harmful Exposures to Employees

- Engineering Controls – Kodiak shall reduce employee exposure to PM2.5 to less than a current AQI of 151 by engineering controls whenever feasible. This shall be accomplished by providing enclosed buildings, structures, or vehicles where the air is filtered. If engineering controls are not enough to reduce exposure to PM2.5 to less than a current AQI of 151, Kodiak shall reduce employee exposures as much as feasible.
- Administrative Controls – Whenever engineering controls are not feasible or do not reduce employee exposures to PM25 to less than a current AQI of 151, Kodiak shall implement administrative controls, if practicable, such as changing work schedules, reducing duration of shift, reducing work intensity, providing additional rest periods, or cease work for the day.
- Control by Respiratory Protective Equipment:
  - Where the current AQI for PM2.5 is equal to or greater than 151, but does not exceed 500, Kodiak shall provide N95 disposable filtering facepiece respirators to all employees for voluntary use. Voluntary use of those respirators does not require fit testing and medical evaluations. Respirators shall be NIOSH-approved devices that effectively protect users from inhalation of PM2.5. N95 disposable filtering facepiece respirators shall be stored, maintained, and replaced so they do not present a health hazard to users.

- Where the current AQI for PM2.5 exceeds 500, respirator use is required. Kodiak shall provide N95 disposable filtering facepiece respirators to all affected employees. Fit Testing and Medical evaluations shall be completed prior to the employee's use of the respirator.

## Measuring PM2.5 Levels at the Worksite

Kodiak may use a direct-reading particulate monitor to determine PM2.5 levels. The monitor shall be designed and manufactured to measure the concentration of airborne particle sizes ranging from an aerodynamic diameter of 0.1 micrometers up to and including 2.5.

## Identification of Respiratory Hazards

Our company has identified the following areas and/or work activities as likely to expose an employee to hazards associated with California Wildfires that may necessitate the use of respiratory protection:

- Any work completed outdoors exposing employees to an AQI for PM2.5 for over an hour during a shift.

## Respirator Selection

Respirators are selected based on respiratory hazards to which the worker is exposed and workplace and user factors that affect respirator performance and reliability. All selections are made by the Program Administrator, the Kodiak Safety Director.

Our company's selection procedures include coverage of the following OSHA requirements:

***Selection Procedure Checklist***

When selecting any respirator in general:

- Select and provide respirators based on respiratory hazard(s) to which a worker is exposed and workplace and user factors that affect respirator performance and reliability.
- Select a NIOSH-certified respirator. (NIOSH stands for the National Institute for Occupational Safety and Health)
- Identify and evaluate the respiratory hazard(s) in the workplace, including a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form. Consider the atmosphere to be immediately dangerous to life or health (IDLH) if you cannot identify or reasonably estimate employee exposure.
- Select respirators from a sufficient number of respirator models and sizes so that the respirator is acceptable to, and correctly fits, the user.

When selecting respirators for IDLH atmospheres:

- Provide these respirators:
  - A full face-piece pressure demand self-contained breathing apparatus (SCBA) certified by NIOSH for a minimum service life of thirty minutes, or
  - A combination full face-piece pressure demand supplied-air respirator Self-contained breathing apparatus (SAR) with auxiliary self-contained air supply.
- Provide respirators NIOSH-certified for escape from the atmosphere in which they will be used when they are used only for escape from IDLH atmospheres.

- Consider all oxygen-deficient atmospheres to be IDLH.

  Exception: If we can demonstrate that, under all foreseeable conditions, the oxygen concentration can be maintained within the ranges specified in Table II of 29 CFR 1910.134 (i.e., for the altitudes set out in the table), then any atmosphere-supplying respirator may be used.

When selecting respirators for atmospheres that are not IDLH:

- Provide a respirator that is adequate to protect the health of the employee and ensure compliance with all other OSHA statutory and regulatory requirements, under routine and reasonably foreseeable emergency situations.
- Select respirators appropriate for the chemical state and physical form of the contaminant.
- For protection against gases and vapors, provide:
  - An atmosphere-supplying respirator, or
  - An air-purifying respirator, provided that: (1) The respirator is equipped with an end-of-service-life indicator (ESLI) certified by NIOSH for the contaminant; or (2) If there is no ESLI appropriate for conditions in our workplace, implement a change schedule for canisters and cartridges that is based on objective information or data that will ensure that canisters and cartridges are changed before the end of their service life. Describe in the respirator program the information and data relied upon and the basis for the canister and cartridge change schedule and the basis for reliance on the data.
- For protection against particulates, provide:
  - An atmosphere-supplying respirator; or
  - An air-purifying respirator equipped with a filter certified by NIOSH under 30 CFR part 11 as a high efficiency particulate air (HEPA) filter, or an air-purifying respirator equipped with a filter certified for particulates by NIOSH under 42 CFR 84; or
  - For contaminants consisting primarily of particles with mass median aerodynamic diameters (MMAD) of at least 2 micrometers, an air-purifying respirator equipped with any filter certified for particulates by NIOSH.

## Respirator Types and Uses

The following types of respirators are in use in Kodiak facilities and staffed job-sites for the following uses:

| Types: | Situation used: |
|---|---|
| N95 Disposable Particulate Respirators | During/After wildfires - Voluntarily when AQI is 151-499, mandatory when AQI is 500 or above |

Only NIOSH-certified N95 disposable particulate filtering facepiece respirators are selected and used. N95 disposable particulate filtering facepiece respirators are to be discarded after use.

## Medical Evaluations

A medical evaluation to determine whether an employee can use a given respirator is an important element of an effective Respiratory Protection Program and is necessary to prevent injuries, illnesses, and even, in rare cases, death from the physiological burden imposed by respirator use.

At Kodiak, only disposable N95 disposable particulate filtering facepiece respirators are used, which do not require medical evaluations when used voluntarily. If the respirator is required to be worn, a medical evaluation must be completed prior to use.

### Additional Medical Examinations

Our company provides additional medical evaluations if:

- An employee reports medical signs or symptoms that are related to ability to use a respirator;
- A PLHCP, supervisor, or the respirator program administrator informs the employer that an employee needs to be reevaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, temperature) that may result in a substantial increase in the physiological burden placed on an employee.

Contact the office manager for a copy of your confidential medical evaluation or questionnaire.

### Fit Testing Procedures

Respirators must fit properly to provide protection. If a tight seal is not maintained between the face-piece and the employee's face, contaminated air will be drawn into the face-piece and be breathed by the employee. Fit testing seeks to protect the employee against breathing contaminated ambient air and is one of the core provisions of our respirator program.

In general, fit testing may be either qualitative or quantitative. Qualitative fit testing (QLFT) involves the introduction of a gas, vapor, or aerosol test agent into an area around the head of the respirator user. If that user can detect the presence of the test agent through subjective means, such as odor, taste, or irritation, the respirator fit is inadequate.

In a quantitative respirator fit test (QNFT), the adequacy of respirator fit is assessed by measuring the amount of leakage into the respirator, either by generating a test aerosol as a test atmosphere, using ambient aerosol as a test agent, or using controlled negative pressure to measure the volumetric leak rate. Appropriate instrumentation is required to quantify respirator fit in QNFT.

Kodiak makes sure those employees are fit tested at the following times with the same make, model, style, and size of respirator that will be used:

- Before any of our employees are required to use any respirator;
- Whenever a different respirator face-piece (size, style, model, or make) is used;
- At least annually;
- Whenever the employee reports, or our company, PLHCP, supervisor, or Program Administrator makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight; and
- When the employee, subsequently after passing a QLFT or QNFT, notifies Kodiak, Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable. That employee

will be retested with a different respirator face-piece.

Employees must pass one of the following fit test types that follow the protocols and procedures:

- QLFT (Only used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less. May be used to test tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators if tested in the negative pressure mode); or
- QNFT (May be used to fit test a tight-fitting half face-piece respirator that must achieve a fit factor of 100 or greater OR a tight-fitting full face-piece respirator that must achieve a fit factor of 500 or greater OR tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators if tested in the negative pressure mode).

Our workplace-specific fit testing procedures include the following:

1) The test subject shall be allowed to pick the most acceptable respirator from a sufficient number of respirator models and sizes so that the respirator is acceptable to, and correctly fits, the user.
2) Prior to the selection process, the test subject shall be shown how to put on a respirator, how it should be positioned on the face, how to set strap tension and how to determine an acceptable fit. A mirror shall be available to assist the subject in evaluating the fit and positioning of the respirator. This instruction may not constitute the subject's formal training on respirator use, because it is only a review.
3) The test subject shall be informed that he/she is being asked to select the respirator that provides the most acceptable fit. Each respirator represents a different size and shape, and if fitted and used properly, will provide adequate protection.
4) The test subject shall be instructed to hold each chosen face-piece up to the face and eliminate those that obviously do not give an acceptable fit.
5) The more acceptable face-pieces are noted in case the one selected proves unacceptable; the most comfortable mask is donned and worn at least five minutes to assess comfort. Assistance in assessing comfort can be given by discussing the points in the following item A.6. If the test subject is not familiar with using a particular respirator, the test subject shall be directed to don the mask several times and to adjust the straps each time to become adept at setting proper tension on the straps.
6) Assessment of comfort shall include a review of the following points with the test subject and allowing the test subject adequate time to determine the comfort of the respirator: (a) Position of the mask on the nose; (b) Room for eye protection; (c) Room to talk; (d) Position of mask on face and cheeks.
7) The following criteria shall be used to help determine the adequacy of the respirator fit: (a) Chin properly placed; (b) Adequate strap tension, not overly tightened; (c) Fit across nose bridge; (d) Respirator of proper size to span distance from nose to chin; (e) Tendency of respirator to slip; (f) Self-observation in mirror to evaluate fit and respirator position.
8) The test subject shall conduct a user seal check, either the negative and positive pressure seal checks described in Appendix B-1 of this section or those recommended by the respirator

manufacturer which provide equivalent protection to the procedures in Appendix B-1. Before conducting the negative and positive pressure checks, the subject shall be told to seat the mask on the face by moving the head from side-to-side and up and down slowly while taking in a few slow deep breaths. Another face-piece shall be selected and retested if the test subject fails the user seal check tests.

9) The test shall not be conducted if there is any hair growth between the skin and the face-piece sealing surface, such as stubble beard growth, beard, mustache or sideburns which cross the respirator sealing surface. Any type of apparel which interferes with a satisfactory fit shall be altered or removed.
10) If a test subject exhibits difficulty in breathing during the tests, she or he shall be referred to a physician or other licensed health care professional, as appropriate, to determine whether the test subject can wear a respirator while performing her or his duties.
11) If the employee finds the fit of the respirator unacceptable, the test subject shall be given the opportunity to select a different respirator and to be retested.
12) Exercise regimen. Prior to the commencement of the fit test, the test subject shall be given a description of the fit test and the test subject's responsibilities during the test procedure. The description of the process shall include a description of the test exercises that the subject will be performing. The respirator to be tested shall be worn for at least 5 minutes before the start of the fit test.
13) The fit test shall be performed while the test subject is wearing any applicable safety equipment that may be worn during actual respirator use which could interfere with respirator fit.
14) Test Exercises.
    a. Normal breathing. In a normal standing position, without talking, the subject shall breathe normally.
    b. Deep breathing. In a normal standing position, the subject shall breathe slowly and deeply, taking caution so as not to hyperventilate.
    c. Turning head side to side. Standing in place, the subject shall slowly turn his/her head from side to side between the extreme positions on each side. The head shall be held at each extreme momentarily so the subject can inhale at each side.
    d. Moving head up and down. Standing in place, the subject shall slowly move his/her head up and down. The subject shall be instructed to inhale in the up position (i.e., when looking toward the ceiling).
    e. Talking. The subject shall talk out loud slowly and loud enough to be heard clearly by the test conductor. The subject can read from a prepared text such as the Rainbow Passage, count backward from 100, or recite a memorized poem or song.
        i. **Rainbow Passage**- When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends

apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond reach, his friends say he is looking for the pot of gold at the end of the rainbow.

## Proper Use Procedures

Once the respirator has been properly selected and fitted, its protection efficiency must be maintained by proper use in accordance with 29 CFR 1910.134(g). Our company ensures with written procedures that respirators are used properly in the workplace. Our company has used the following checklist to ensure that proper use procedures include coverage of OSHA requirements:

***Face-piece Seal Protection***

- Do not permit respirators with tight-fitting face-pieces to be worn by employees who have:
  - Facial hair that comes between the sealing surface of the face-piece and the face or that interferes with valve function; or
  - Any condition that interferes with the face-to-face-piece seal or valve function.
- If an employee wears corrective glasses or goggles or other personal protective equipment, ensure that such equipment is worn in a manner that does not interfere with the seal of the face-piece to the face of the user.
- For all tight-fitting respirators, ensure that employees perform a user seal check each time they put on the respirator using the procedures in the User Seal Check Procedures or procedures recommended by the respirator manufacturer that you can demonstrate are as effective as those listed.

***Continuing Respirator Effectiveness***

- Appropriate surveillance must be maintained of work area conditions and degree of employee exposure or stress. When there is a change in work area conditions or degree of employee exposure or stress that may affect respirator effectiveness, reevaluate the continued effectiveness of the respirator.
- Ensure that employees leave the respirator use area:
  - To wash their faces and respirator face-pieces as necessary to prevent eye or skin irritation associated with respirator use; or
  - If they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the face-piece; or
  - To replace the respirator or the filter, cartridge, or canister elements.
- If the employee detects vapor or gas breakthrough, changes in breathing resistance, or leakage of the face-piece, replace or repair the respirator before allowing the employee to return to the work area.

***Procedures for Immediately Dangerous to life or health (IDLH) Atmospheres***

Ensure that:

- One employee or, when needed, more than one employee is located outside the IDLH atmosphere;
- Visual, voice, or signal line communication is maintained between the employee(s) in the IDLH atmosphere and the employee(s) located outside the IDLH atmosphere;
- The employee(s) located outside the IDLH atmosphere are trained and equipped to provide effective emergency rescue;
- The employer or designee is notified before the employee(s) located outside the IDLH atmosphere enter the IDLH atmosphere to provide emergency rescue;
- The employer or designee authorized to do so by Kodiak, once notified, provides necessary assistance appropriate to the situation;
- Employee(s) located outside the IDLH atmospheres are equipped with:
    - Pressure demand or other positive pressure self-contained breathing apparatuses (SCBAs), or a pressure demand or other positive pressure supplied-air respirator with auxiliary SCBA; and either:
    - Appropriate retrieval equipment for removing the employee(s) who enter(s) these hazardous atmospheres where retrieval equipment would contribute to the rescue of the employee(s) and would not increase the overall risk resulting from entry; or equivalent means for rescue where retrieval equipment is not required.

### Maintenance and Care Procedures

Kodiak, only uses disposable N95 respirators. N95 respirators are to be discarded upon the expiration date printed on the packaging and/or following use.

### Training

Employee training is an important part of the respiratory protection program and is essential for correct respirator use.

Our training program is two-fold; it covers both the:

- Respiratory hazards to which our employees are potentially exposed during routine and emergency situations, and
- Proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance.

Both training parts are provided prior to requiring an employee to use a respirator in our workplace. However, if an employee has received training within 12 months addressing the seven basic elements of respiratory protection (see "Seven basic elements" below) and Kodiak and the employee can demonstrate that he/she has knowledge of those elements, then that employee is not required to repeat such training initially.

Yet, we do require all our employees to be retrained annually and when the following situations occur:

- Changes in the workplace or the type of respirator render previous training obsolete;
- Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has

not retained the requisite understanding or skill; or

- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

***Seven Basic Elements***

Our employees are trained sufficiently to be able to demonstrate knowledge of at least these seven elements:

1) Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator.
2) What the limitations and capabilities of the respirator are.
3) How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions
4) How to inspect, put on, remove, use, and check the seals of the respirator.
5) What the procedures are for maintenance and storage of the respirator.
6) How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.
7) The general regulatory requirements.

The basic advisory information on respirators, as presented below is provided by our Program Administrator in any written or oral format, to employees who wear respirators when such use is not required by the regulations or by our company.

## Information for Employees Using Respirators When Not Required Under the Standard

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

You should do the following:

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will

not protect you against gases, vapors, or very small solid particles of fumes or smoke.

## Program Evaluation

It is inherent in respirator use, that problems with protection, irritation, breathing resistance, comfort, and other respirator-related factors occasionally arise in most respirator protection programs. Although it is not possible to eliminate all problems associated with respirator use, we try to eliminate as many problems as possible to improve respiratory protection and encourage employee acceptance and safe use of respirators. By having our program administrator, the Safety Officer, thoroughly evaluate and, as necessary, revise our Respiratory Protection Program, we can eliminate problems effectively.
At Kodiak, program evaluation, performed by the Safety Officer our program administrator, involves the following:

- Conducting evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.
- Regularly consulting employees required to use respirators to assess their views on program effectiveness and to identify any problems. Any problems that are identified during this assessment must be corrected. Factors to assess include, but are not limited to:
    - Respirator fit (including the ability to use the respirator without interfering with effective workplace performance)
    - Appropriate respirator selection for the hazards to which the employee is exposed
    - Proper respirator use under the workplace conditions the employee encounters
    - Proper respirator maintenance

# V. HEAT ILLNESS PREVENTION PLAN

OSHA adopted a heat illness prevention regulation to prevent heat-related illnesses and deaths. This regulation includes training, temperature monitoring, rest periods, and access to shade, all important factors employees need to know to prevent heat-related illnesses. This plan was created in response to this regulation, and to ensure the continued safety of all Kodiak employees.

Kodiak management and/or job foreman/supervisor will evaluate your outdoor working location for air temperature, humidity, and radiant heat from the sun to determine if there is a risk for heat illnesses. Kodiak job foreman/supervisor will also evaluate employee workloads, the protective clothing and personal protective equipment employees use, to see how they add to this risk. When the temperature approaches 80 degrees or higher when working outdoors, employees are at an elevated risk of a heat illness and should take steps as outlined in this plan to control these risks.

### Heat Illness Prevention Elements

The elements reflected within this Heat Illnesses Prevention Plan are those Contained in Title 8 of the California Code of Regulations, Section 3395 (T8 CCR 3395) and consist of the following:

- Provision of water
- Access to shade
- Written procedures
- Training

### Provisions of Water

Drinking water is important to reduce the risk of heat illness. While performing heavy work or working in hot conditions, the human body loses up to two gallons of water per day. Employee's need to consume about four cups of water or more every hour starting at the beginning of the work shift and continuing throughout the day. The following shall apply on each Kodiak worksite:

- Adequate quantities of fresh, pure, suitably cool water (minimum 2 gallons per employee) shall be maintained by the job foreman/supervisor throughout each shift for all Kodiak employees onsite.
- The water cooler shall be located as close as practical to where employees are working.
- Drinking cups will be provided by the job foreman.
- Drinking cups shall be disposed in an appropriate waste container.
- Employees shall not share drinking cups or containers.
- Personal water bottles or drinking containers shall be marked to identify the owner of said container.
- Employees shall report to job foreman/supervisor if attention is needed to ensure water quality and quantities.
- Foremen are responsible for cleaning the water container as needed.
- Foremen are responsible for refreshing the water supply as needed through a potable source onsite or obtaining water offsite as needed.
- The Kodiak foreman shall check the water supply levels every 1- 2 hours throughout the shift to ensure adequate water quantities are maintained

- Prior to each shift the job foreman/supervisor will remind employees of the importance of frequent water consumption throughout the day.

### Access to Shade

Shade is required to be present when the outside temperature equals or exceeds 80° F. Rest breaks allow your body to recover from work in the heat. A rest break in the shade, for at least five minutes, can reduce heat stress and prevent heat illness. Use rest breaks to recover from hard work in the sun before any heat illness symptoms appear. Kodiak will:

- Allow employees to take rest breaks of at least 5 minutes whenever requested and/or if it is determined by the foreman/supervisor to be necessary.
- Identify and provide employees with shaded rest areas that have good air movement when the temperature equals or exceeds 80° F.
- Shade from buildings, canopies, lean-to's, and trees are acceptable for rest areas.
- Temporary canopies will be provided when no other means of shade are available. These will be set up and maintained by the job foreman/supervisor as close to the work area as feasible.
- The use of vehicle interiors for shade, unless they are air conditioned or kept cool in some other way, is prohibited.
- Shaded rest areas shall have enough room to accommodate all those employees on recovery or rest breaks and those employees that are onsite taking a lunch or meal break.
- Employees shall not rest underneath equipment, machinery, in confined spaces or in areas that will expose employees to injury or hazardous conditions.

### Written Procedures

Since written procedures help reduce the risk of heat related illnesses, and ensure that emergency assistance is provided without delay. Kodiak has implemented the following procedures:

- All Kodiak employees will be trained in Heat Illness Prevention prior to working outdoors.
- Training documents are maintained by the safety director in the corporate office. Copies of these documents are submitted to Human Resources to be filed in the employee's file.
- Working hours will be modified to work during the cooler hours of the day, when possible.
- When a modified or shorter work-shift is not possible, more water and rest breaks will be provided.
- Job foremen/supervisors will continuously monitor all employees, and stay alert to the presence of heat related symptoms.
- New employees shall be monitored closely for the first 14 days of employment at Kodiak to be sure the employee is acclimated and understands the need to keep himself rested and properly hydrated.
- Job foremen/supervisors shall carry cell phones, radios or other means of communication and verify that said equipment is working, to ensure that emergency services can be summoned when necessary
- Job foreman/supervisors must ensure that the foreman's job packet containing job specific and job critical information is available at all times at each worksite.

- The designated medical facility is noted in the foreman job packet. The foreman should check to be sure the information is accurate and valid by calling the facility to verify all information prior to the start of work.
- Jobsites that require more than 20 Kodiak employees onsite must maintain a ratio of 1 supervisor to 20 employees or fewer.
- To evaluate the working conditions that employees will encounter on the job, Kodiak management will check the Heat Index: a combination of temperature and humidity. This information can be obtained on the internet at www.weather.com or from other reliable sources such as news stations and websites providing weather and element information. This information shall be given to the job-site foreman to help in determining scheduling, workloads, number of breaks etc.
- During hot weather, the Kodiak foreman shall monitor the temperature at the worksite throughout the day using a thermometer. These readings shall be taken in an area of full sunlight while shielding the bulb or sensor from direct sunlight. The temperature shall not be measured in shaded areas.
- As the foreman monitors the temperatures throughout the day, he/she will use this information in determining, rest break frequency, length of rest breaks, and length of work shift.
- Employees taking preventative cool-down rest breaks shall be monitored for symptoms consistent with heat illness. If symptoms are present, the employee shall be ordered to continue the preventative rest cool-down break until symptoms are gone.
- Employee(s) with heat illness symptoms shall be given the appropriate first aid or emergency response immediately.

Kodiak employees are encouraged to implement the following steps to help prevent heat illness;

- Avoid drinking caffeine in the morning and alcohol the night before working.
- Get plenty of sleep and eat well.
- Take breaks and drink plenty of water during the day.
- Remember it takes about two weeks to get used to working in a hot environment.

### High Heat/Heat Wave Procedures

During High Heat days (95 degrees & above) and Heat Waves (defined as, temperature of at least 80° F and at least 10° F higher than the average high daily temperature in the preceding 5 days) the job foremen/supervisors shall:

- Consider starting and ending the work shift earlier to take advantage of the cooler temperatures early in the day.
- Maintain drinking water in the immediate vicinity of the work being performed.
- Hold short tailgate meetings daily to review the Heat Illnesses Prevention Safety Checklist with all workers onsite.
- Encourage workers to take frequent water breaks.
- Provide at least one ten (10) minute cool down break every two (2) hours.
- Establish regular communication with each employee that may be working alone.
- Institute a buddy system where all employees will work with a buddy or buddies to help monitor one another for signs of heat illness.
- Encourage workers to take frequent rest breaks in a shaded area as needed.

- Monitor employees frequently through verbal communication and observation looking for signs of heat illness.
- Encourage workers to avoid soda, coffee and alcohol before and after work.

## Emergency Response

Kodiak foremen and employees share in the responsibility for monitoring each other for the following symptoms of heat illness and the steps in treating them:

**Heat Rash** is mild discomfort and can be treated by changing clothes and using powder or medicated cream.

**Heat Cramps** are in muscle groups such as legs, back and in the abdomen. Treat cramps by drinking water and putting electrolytes back into your body with sports drinks and eating snacks like pretzels or potato chips.

**Heat Exhaustion** is serious with signs like profuse sweating, dizziness, weakness, fatigue, nausea, intense headaches, and even ringing in the ears. Treatment should be immediate and includes drinking plenty of water and resting in shade or air-conditioned areas. Kodiak employees experiencing heat exhaustion shall be taken to the designated medical facility noted in the foreman's pack for treatment.

**Heat Stroke** is severe and could result in death. Signs and symptoms include excessive body temperature (over 104 degrees), increasing disorientation, red patchy and dry skin (not sweating) and even altered behavior. Medical treatment should be called for immediately (call **911**). Until treatment arrives, cool the victim in air conditioning or shade, and remove or wet the employees clothing.

Additionally,

- All foremen driving Kodiak trucks are responsible, designated drivers for non-life-threatening injuries and/or emergency purposes.
- Job foremen/supervisors shall contact 911 for any life-threatening emergencies or injuries.
- Since many jobsites are large, the foreman shall send another employee to the main entrance to direct the emergency responders to the ill/injured employee.
- Job foremen/supervisors trained in First-Aid will be responsible for effectively monitoring employees by means of verbal communication and observation throughout the work shift.
- The job foreman/supervisor on each job will complete all Kodiak IIPP documents required, as with any other injury or illness, for any heat related illness and consider it as a workplace injury to be submitted to the Safety Director for further review.
- The Safety Director will take additional action as necessary to provide a safe work environment for all Kodiak employees.

## Training

Training is critical to help reduce the risk of heat related illnesses, and to assist with obtaining emergency assistance without delay. Training in the following topics shall be provided to all supervisory and non-supervisory employees:

- All Kodiak employees will be trained in Heat Illnesses prevention when hired, prior to working outdoors and through periodic Tailgate Safety/Training meetings.
- Training documents shall be submitted to the Safety Director for review. The documents shall then be submitted to Human Resources to be filed in the employee's file.

- The foreman/supervisor assigned shall complete a jobsite specific Heat Illness Prevention Safety Checklist (FORM IIPP-15) when arriving on the jobsite for the first time.
- The designated medical facility location and address noted in the job foreman/supervisor job packet shall be communicated to all employees on each jobsite.
- Procedures for working in High Heat (95° F and above) and during a Heat Wave (defined as, temperature of at least 80° F and at least 10° F higher than the average high daily temperature in the preceding 5 days).
- All newly hired workers will be assigned a buddy or experienced coworker to ensure that they understand the training and follow Kodiak procedures for the new employees first 2 weeks on the job in high heat conditions or heat waves.
- New employees shall be assigned light duty work for the first few days to allow the employee's body to acclimate to the heat before requiring heavy and/or strenuous work from said employee.
- Employees shall receive refresher training through tailgate safety meetings.
- Each job foreman/supervisor shall be trained in Heat Illnesses prevention prior to assignment to supervision of employees working in the heat and once yearly to re train in Heat Related Illness Prevention. Training topics covered are as follows:
  - The information as listed in each section of this plan.
  - The procedures job foreman/supervisor is to follow in order to implement the applicable provisions in this section.
  - The procedures a Kodiak supervisor is to follow when an employee presents with symptoms consistent with possible heat illness, including emergency response procedures.

A paper or electronic copy of this plan is available to all Kodiak employees upon request from the Kodiak Safety team, Management Personnel or Supervisors.

# W. LOCKOUT/TAG-OUT POLICY

Kodiak recognizes that during the servicing and/or maintenance of equipment or machinery, Kodiak employees have the potential to be involved in a serious or fatal accident caused by the unexpected movement, start-up or release of stored energy of machinery or equipment. Service or maintenance includes erecting, installing, constructing, repairing, adjusting, inspecting, un-jamming, setting up, trouble-shooting, testing, cleaning and dismantling machines, equipment or processes. This policy will ensure that machinery or equipment is isolated from all hazardous energy sources and properly locked or tagged out per Federal and California OSHA regulations found in **29 CFR 1910.147** and **CCR T8 §3314** respectively. Kodiak's stated intent of this program is to require the use of locks wherever possible in conjunction with identification/warning tags to provide positive energy isolation.

### Scope

This policy applies to all Kodiak employees who may be exposed to hazardous energy during service or maintenance work. All operations that require employees to remove or bypass equipment/machine guarding, or other safety devices are regulated by this policy. In addition, any employee that is required to place any part of his/her body into the mechanism of a piece of equipment or machinery or into the path of any type of hazardous energy is also regulated by this policy. Excluded from this policy are activities that are routine, repetitive and integral to the use of the equipment/machine or the operator(s) have been properly trained in the precautionary steps necessary to perform the activity safely or is provided other protection (guarding).

### Definitions

Affected Employee- A person who uses equipment/machinery that is being serviced under lockout or Tag-out procedures, or who works in an area where equipment/machinery is being serviced.
Authorized Employee- A person who locks out or tags out equipment/machinery in order to service or maintain said equipment/machinery. An affected employee becomes an authorized employee when his/her duties include service or maintenance work on equipment.
Cord and Plug Connected Equipment- Equipment/machinery where the only energy source is electrical power provided by a plug-in connection.
Disconnect- A switch that disconnects an electrical circuit or load (motor, transformer or panel) from the conductors that supply power to it. An open circuit does not allow electrical current to flow.
Energized- Connected to an energy source or containing residual or stored energy.
Energy Source- any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other hazardous energy.
Energy Isolating Device- A mechanical device that physically prevents the transmission or release of energy, i.e. locks, pins, hasps, clam shell devices, blocks or restraining devices designed to prevent movement of parts. These devices must be designed to accept a lockout device and must clearly identify function. (Electrical, Pneumatic, Hydraulic etc.)
Lockout device- A device that locks an energy-isolating device in a safe position.
Lockout- The placement of a lock on an energy isolating device, in accordance with an established procedure, that will ensure that the energy isolating device and equipment/machinery being controlled cannot be operated until the lockout device is removed.

Servicing and/or Maintenance- Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing equipment/machines. These activities include lubricating, cleaning or un-jamming, adjusting or tool changes where employees may be exposed to the unexpected start-up or release of hazardous energy.
Tag-Out Device- A prominent warning sign, such as a tag, that can be securely fastened to an energy isolating device to indicate that the energy isolating device and the equipment/machine it controls can't be operated until the Tag-out device is removed.
Tag-Out-Placing a Tag-out device on an energy isolating device, under established procedure, to indicate that the isolating device and equipment/machine it controls cannot be operated until the Tag-out device is removed.

## Training

All Kodiak employees or contractor involved in or affected by lockout will be trained in the following areas before being allowed to work around equipment/machines subject to this policy:

- The recognition of hazardous energy sources
- The type and magnitude of the energy located in the workplace
- The procedures for energy isolation and control including specific procedures developed for each piece of equipment/machinery and systems.
- The purpose and use of the energy control.
- The prohibition and penalties for attempting to restart or re-energize equipment/machinery which has been locked out or to work on equipment/machinery without following the lockout/Tag-out procedures.
- Warning tags alone do not prevent the equipment from being energized inadvertently.

Affected employees (see definitions) are not required to be familiar with specific lockout/tag-out procedures for equipment/machinery and systems.
Retraining or refresher training will be conducted whenever one of the following exist:

- The employee has a change of job assignment.
- Equipment/machinery or process changes.
- A change in the lockout/Tag-out policy.
- Whenever an inspection reveals deviations from the standard procedures.
- Inadequacies in the employee's knowledge or use of lockout/Tag-out procedures.
- An accident as a result of unexpected energy release.

All Kodiak employee training and retraining will be documented and verified by the signing and dating of the Annual Lockout/Tag-out Audit Report Form IIPP 14. These records will be maintained in the Kodiak Safety Directors office and will be updated annually.

## Lockout/Tag-Out Devices

Lockout and Tag-out devices must meet the following criteria:

- Lockout devices must work in the environmental conditions in which they are used.
- Tag-out device warnings must remain legible even when used in wet, damp or corrosive conditions.
- Lockout/Tag-out devices must be strong enough that they cannot be inadvertently removed.

- Tag-out devices must be attached using a single use, attachable by hand, self-locking and non-releasing material with an unlocking strength of 50lbs or greater.
- Any Kodiak employee who sees a Tag-out device must be able to recognize who attached it the date it was attached and why it was attached.
- Each lock must have a unique key or combination

## Annual Lockout/Tag-Out Audit

The Kodiak Safety Director is responsible for conducting a hazardous energy survey to determine all affected equipment/machines, types and magnitude of energy, and the necessary service and maintenance tasks. Each task will be evaluated to determine if lockout/Tag-out procedures are required. An Annual Lockout/Tag-out Audit shall be conducted by the Kodiak Safety Director in order to determine the effectiveness of the Kodiak Lockout/Tag-out Policy.

**Lockout Procedures:** Equipment will only be locked and tagged out by Authorized Employees (see definitions) who have been trained in Kodiak's procedures and who have been trained on the specific procedures for the affected equipment/machinery that is to be locked out.

- All affected employees will be notified of the intent to lockout/Tag-out the equipment/machinery prior the application of the lockout/Tag-out devices.
- Equipment/machinery will be shut down according to the procedures developed for that specific piece of equipment/machinery.
- All energy sources for the equipment/machinery identified in the shutdown procedures are to be locked out as follows:
  - Each Authorized Employee involved with the operation will apply their locks to each energy-isolating source.
  - When multiple Authorized Employees are necessary for repair or maintenance on the equipment/machinery, one Authorized Employee shall be assigned as the lead and shall be the first person to apply their lock to the equipment/machinery and shall be the last to remove their lock after the repairs or maintenance is complete.
  - A warning tag describing who applied the lock, the date of application and why the equipment is locked out shall be applied with the lock.
  - Locks used shall have 2 keys. One key will remain in possession of the Authorized Employee that applied their lock. The second key shall be in the custody of the Kodiak Safety Director in a secure location.
  - All locks used in this facility for the Lockout/Tag-out program must be keyed individually.
  - Residual or stored energy must be relieved, disconnected, blocked off restrained or made safe prior to commencement of service, repairs, maintenance etc. Energy sources that may be subject to re-accumulation i.e. capacitors, air pressure vessels, hydraulic reservoirs etc., should be isolated or locked out. If a possibility of re-accumulation, verification of isolation shall continue until the servicing or maintenance is complete.
  - Verify that all energy sources have been shut down and made safe, clear all personnel away from the equipment/machinery and attempt to restart or activate the equipment/machinery. After verifying that the equipment has been made safe ensure that all controls, switches are returned to their off position.

- Equipment/Machinery connected to energy sources through a cord and plug do not require Lockout/Tag-out if the following conditions are present:
- The Authorized Employee is within sight of the equipment/machinery.
- Unplugging the equipment/machinery removes all energy sources from the equipment/machinery
- The equipment has no stored energy.

If the equipment/machinery must be left un-attended or the above 3 conditions are not met, then the equipment/machinery is subject to the Lockout/Tag-out program. The plug shall have a lockout device attached to it to prevent it from being plugged into an energy source and a Warning Tag shall be attached at the on/off switch. The Warning Tag shall indicate who installed the lockout device, the date it was attached and why it has been attached.

> ***NOTE**: Kodiak policy does not allow Warning Tags to be used alone **unless** it has been authorized by the Kodiak Safety Director in writing. The authorization must justify why the Equipment/Machinery does not lend itself to being physically locked out. Should this Equipment/Machinery be upgraded or modified, a means shall be added to allow the equipment/machinery to be locked out.*

**Multi-Shift Operations:** On occasion, it may be necessary that an Authorized Employee, other than the one originally applying a lock out device to the affected Equipment/Machinery, must complete the service or maintenance because of a shift or personnel change. In these instances, the new Authorized Employee must verify that the equipment/machinery is completely isolated from all energy sources before applying their lock to the lockout device. After their lock has been applied, the original Authorized Employee may remove their lock. Under no circumstances shall the original Authorized Employee remove their lock until the new Authorized Employee has installed their lock and warning tag.

**Removal of Locks and Tags:** The following procedures are extremely important and are required to be followed when locked or tagged equipment/machinery is brought back into service or under certain circumstances when locks or tags must be removed.

***UNAUTHORIZED REMOVAL OF ANY LOCKS OR WARNING TAGS FROM A PROPERLY LOCKED AND TAGGED OUT PIECE OF EQUIPMENT/MACHINERY WILL RESULT IN DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION.***

When locks or warning tags are to be removed without the Authorized Employee present that locked and tagged out the equipment/machinery, the approval of the Kodiak Safety Director is required after all efforts have been exhausted to have the Authorized Employee that applied the lock to remove their lock and warning tag. The following must be followed prior to restart:

- The Kodiak Safety Director shall consult with maintenance personnel to determine if the Equipment/Machinery repairs are complete and that the affected equipment/machinery is safe to restart.
- The work area shall be inspected to ensure that all personnel, tools, loose parts and non-essential items are clear of the equipment/machinery.
- Affected Employees shall be notified prior to start-up of the equipment/machinery.
- All Affected, Authorized Employees and contractors as well as other company personnel shall be safely positioned to eliminate the chance of anyone being exposed to the release of hazardous equipment/machinery.

**Outside Contractors:** Outside contractors brought into Kodiak facilities to perform maintenance or repairs on equipment/machinery at Kodiak must provide a copy of their company's Lockout/Tag-out program and evidence that they have been trained on those procedures. If they cannot provide this information, then they will be required to go through the Kodiak Lockout/Tag-out training prior to being allowed to work on Kodiak equipment/machinery.

***This Safety Program is an important part of Kodiak's safety program and as such is critical in ensuring the safety and health of our employees and others working at Kodiak. If you have any questions regarding the applicability to any operation or procedure, check with your supervisor or the Kodiak Safety Director.***

# X. RESPIRATORY PROTECTION PROGRAM

## Overview

This program establishes practices and procedures for employee use of respiratory protection. We use only NIOSH-approved respiratory protection.

Implementation of this procedure ensures employee protection from respiratory hazards. All employees assigned to use respiratory protection will be medically approved and trained in accordance with these requirements.

**References**

| | |
|---|---|
| 29 CFR 1910.134 | Respiratory Protection |
| 29 CFR 1926.103 | Respiratory Protection |
| ANSI Z88.2-1980 | Practices for Respiratory Protection |
| ANSI Z88.6-1984 | Physical Qualifications for Respirator Use |

## Definitions

Air-purifying respirator: A respirator with an air-purifying filter, cartridge, or canister that removes specific air contaminants by passing ambient air through the air-purifying element.

Atmosphere-supplying respirator: A respirator that supplies the user with air from a source independent of the ambient atmosphere. This includes supplied-air respirators (SARs) and self-contained breathing apparatus (SCBA) units.

Canister or cartridge: A container with a filter, sorbent, catalyst or a combination, which removes specific contaminants from the air that passes through the container.

Demand respirator: An atmosphere-supplying respirator that admits breathing air to the face piece only when a negative pressure is created inside the face piece by inhalation.

Emergency Situation: Any occurrence such as, but not limited to, equipment failure, rupture of containers or failure of control equipment that may result in an uncontrolled significant release of an airborne contaminant.

Employee exposure: Exposure to a concentration of an airborne contaminant that would occur if the employee were not using respiratory protection.

End-of-service-life indicator (ESLI): A system that warns the respirator user of the approach of the end of adequate respiratory protection, (i.e., that the sorbent is approaching saturation or is no longer effective).

Escape-only respirator: A respirator meant to be used only for emergency exit.

Filter or air purifying element: A component used in respirators to remove solid or liquid aerosols from the inspired air.

Filtering face piece (dust mask): A negative pressure particulate respirator with a filter as an integral part of the face piece or with the entire face piece composed of the filtering medium.

Fit factor: A quantitative estimate of the fit of a particular respirator to a specific individual; typically estimates the ratio of the concentration of a substance in ambient air to its concentration inside the respirator when worn.

Fit test: The use of a protocol to qualitatively or quantitatively evaluate the fit of a respirator on an individual. (See also Qualitative fit test QLFT and Quantitative fit test QNFT.)

Helmet: A rigid respiratory inlet covering that also provides head protection against impact and penetration.
High efficiency particulate air (HEPA) filter: A filter that is at least 99.97% efficient in removing monodisperse particles of 0.3 micrometers in diameter. The particulate filters are the N100, R100, and P100 filters.
Hood: A respiratory inlet covering that completely covers the head and neck and may also cover portions of the shoulders and torso.
Immediately dangerous to life or health (IDLH): An atmosphere that poses an immediate threat to life, would cause irreversible adverse health effects or would impair an individual's ability to escape from a dangerous atmosphere.
Interior structural firefighting: The physical activity of fire suppression, rescue or both, inside buildings or enclosed structures which are involved in a fire situation beyond the incipient stage. (See 29 CFR 1910.155)
Loose-fitting face piece: A respiratory inlet covering designed to form a partial seal with the face.
Negative pressure respirator (tight fitting): A respirator in which the air pressure inside the face piece is negative during inhalation with respect to the ambient air pressure outside the respirator.
Oxygen deficient atmosphere: An atmosphere with an oxygen content below 19.5% by volume.
Physician or other licensed health care professional (PLHCP): An individual who's legally permitted scope of practice (i.e., license, registration or certification) allows him or her to provide some or all of the health care services required by this program.
Positive pressure respirator: A respirator in which the pressure inside the respiratory inlet covering exceeds the ambient air pressure outside the respirator.
Powered air-purifying respirator (PAPR): An air-purifying respirator that uses a blower to force the ambient air through air-purifying elements to the inlet covering.
Pressure demand respirator: A positive pressure atmosphere- supplying respirator that admits breathing air to the face piece when the positive pressure is reduced inside the face piece by inhalation.
Qualitative fit test (QLFT): A pass/fail fit test to assess the adequacy of respirator fit that relies on the individual's response to the test agent.
Quantitative fit test (QNFT): An assessment of the adequacy of respirator fit by numerically measuring the amount of leakage into the respirator.
Respiratory inlet covering: The portion of a respirator that forms the protective barrier between the user's respiratory tract and an air-purifying device or breathing air source, or both. It may be a face piece, helmet, hood, suit or a mouthpiece respirator with nose clamp.
Self-contained breathing apparatus (SCBA): An atmosphere-supplying respirator for which the breathing air source is designed to be carried by the user.
Service life: The period of time that a respirator, filter or sorbent, or other respiratory equipment provides adequate protection to the wearer.
Supplied-air respirator (SAR) or airline respirator: An atmosphere-supplying respirator for which the source of breathing air is not designed to be carried by the user.
Tight-fitting face piece: A respiratory inlet covering that forms a complete seal with the face.
User seal check: An action conducted by the respirator user to determine if the respirator is properly seated to the face.

## Responsibilities and Authorities

The Kodiak Safety Director has been designated as the Respiratory Program Administrator:

- The Kodiak Safety Director is responsible for the administration of the Respiratory Protection training program.
- The Kodiak Safety Director has the authority and responsibility for preparing, maintaining and administering the facility's "Respiratory Protection Program."
- The Kodiak Safety Director has the authority for review and approval of internal procedures involving the use of respiratory protection equipment.
- An annual evaluation of the Respiratory Protection Program shall be performed under the direction of the Kodiak Safety Director.
- The Kodiak Safety Director shall perform an evaluation of each job with a potential for overexposure to airborne contaminants (or exposure to an oxygen-deficient atmosphere) and determine appropriate control measures.
- The Kodiak Safety Director shall insure that all Kodiak personnel that may be exposed to harmful vapors/contaminants or oxygen deficient atmospheres have received training on Kodiak's Respiratory Protection Program.
- Documentation shall be maintained concerning the Respiratory Protection Program annual evaluation, jobsite/workplace evaluations, respiratory training, re-training and fit testing by the Kodiak Safety Director.
- The Kodiak Safety Director shall ensure that an individual employee's physiological and psychological state is such that the employee may be assigned to a task that requires use of a respirator. A medical history questionnaire (Appendix C of 1910.134) shall be used to assist in making the determination.

## Management/Supervisors

- Management/Supervisors shall ensure that all respirator wearers comply with the requirements of this program.
- Management/Supervisors are responsible for ensuring that personnel who may need to wear respirators receive the training outlined in this chapter.

## Employees

1)Employees are responsible for using respiratory protection equipment properly.
2)Each respirator wearer is responsible for performing field inspection of respirators before and after each use in accordance with the manufacturer's recommendations.
3)Respirator wearers are responsible for properly sanitizing and storing respiratory protection devices between uses.

## Program Elements

Medical Evaluation and Surveillance

- A medical evaluation shall be performed prior to fit testing and respirator issuance for each employee to determine the employee's physiological and psychological condition with respect to respirator usage.
- The medical evaluations shall:
  - Be convenient
  - Occur during regular business hours
  - Be clear
  - Be understandable (given in the native language)
  - Remain confidential
  - Give the individual the opportunity to discuss the results with the physician or other medical health care professional.
- The evaluation shall include the completion of a medical history questionnaire and may include a medical examination. The medical history questionnaire shall be used to determine:
- Previously diagnosed disease, particularly involving the cardiovascular or respiratory systems.
- Psychological problems or symptoms, including claustrophobia.
- Problems associated with breathing during normal work activities.
- Past problems with respirator use.
- Past and current use of medication.
- Any known physical deformities or abnormalities, including those which may interfere with respirator use.
- Previous occupations.
- Tolerance of tachycardia (rapid heart rate) produced by inhalation of heated air.
- A physician shall perform the medical examination. Specific content of the examination shall be determined by the physician, but should include evaluation of the factors in ANSI Z88.6.
- The Kodiak Safety Director shall maintain documentation of the results of the evaluation of the employee's suitability for use of each type of respirator.
- Employees who are not qualified for respirator use shall be so notified in writing by the Kodiak Safety Director.
- Medical surveillance, including bioassay, shall be conducted, as appropriate, to determine whether respirator wearers are being provided adequate respiratory protection.
- Medical surveillance shall be coordinated between the Kodiak Safety Director and the chosen Medical Clinic concerning when, where and how medical surveillance is to be conducted.

## Fit Testing and Training

- Before being issued a negative pressure respirator, each employee must first have successfully completed a respirator fit test administered by a qualified person.
- All fit testing shall be performed in accordance with Appendix A of 1910.134.
- Fit testing for Tight-fitting face pieces must include either a qualitative QLFT or quantitative QNFT fit testing regimen.
- Employees will only be issued and allowed to wear respirator types, sizes and brands for which an acceptable fit has been achieved. Should an acceptable fit not be achieved, the associate will be notified in writing by the Kodiak Safety Director.
- Respiratory training and fit testing shall be repeated at least annually.

- All fit test records shall be maintained by the Kodiak Safety Director.
- Each respirator user shall receive initial training and annual training thereafter on the safe and proper use of respiratory protection equipment.
- Each respirator user shall be initially trained and annually retrained on the following:
  - The reason and need for respiratory protection.
  - The nature and extent of potential effects of the respiratory hazards to which the wearer may be exposed.
  - Why respiratory protection is being used, as opposed to engineering and other control measures.
  - Why a particular type of respiratory protection is selected for a specific respiratory hazard.
  - The operation, capabilities and limitations of respiratory protection devices and their components.
  - Instructions to inspect, assemble, don, check proper fit and wear the respirator in accordance with the requirements of this program.
  - How maintenance and repair of respirators will be performed.
  - The proper care and field sanitation of various types of respiratory protection equipment.
- Each respirator user shall be required to handle the respirator, learn how to don it and wear it properly, check its fit, wear it in a safe atmosphere and wear it in a test atmosphere.

Facial Hair, Eye and Face Protection and Corrective Lenses

- Fit testing of tight-fitting face pieces shall not be performed, and respirators shall not be issued to any employee whose facial hair may interfere with the proper seal of the respirator.
- The following conditions prohibit the issue or use of a respirator:
  - Hair (beard, stubble, mustache, sideburns, low hairline, bangs) that passes between the face and the sealing surface of the respirator face piece.
  - Hair (mustache, beard) that interferes with the function of one or more of the respirator valves.
  - Glasses having temple bars or straps that pass between the sealing surfaces of a respirator face piece and the face.
  - Any head covering that passes between the sealing surfaces of a respirator face piece and the face.
  - Spectacles, goggles, face shield, welding helmet or other eye and face protective device that interferes with the seal of the respirator to the face.
  - Scars, hollow temples, excessively protruding cheekbones or other unusual facial configuration that prevents the seal of a respirator face piece to the face.
  - Weight fluctuations that may prevent an adequate seal.
  - Corrective lenses (approved safety glasses only) may be worn with half-face piece respirators provided the glasses do not interfere with the seal of the respirator face piece to the face.
  - If the attending physician indicates that corrected vision is a requirement for the employee to safely perform his or her job and a full-face respirator is required, we will provide a corrective lens spectacle kit for installation inside the full-face respirator in accordance with our regular safety glass program.

## Periodic Evaluation of Program Effectiveness

- The respiratory protection program shall be evaluated at least annually to ensure compliance with applicable regulations, standards and recognized best management practices.
- Any changes incorporated in the program as a result of program evaluation shall be communicated to respirator users through the training program.

## Approved Respirators

- Only respiratory equipment, components and replacement parts certified by NIOSH (National Institute for Occupational Safety and Health) will be purchased and used.
- NIOSH certified respirators shall be selected based upon the hazards that the affected personnel may be exposed to.
- Components may not be interchanged between equipment of different manufacturers or different models from the same manufacturer (unless the manufacturer has designed interchangeable parts).
- No respirators other than those purchased by us and issued (or approved) by the Kodiak Safety Director may be used at Kodiak facilities or jobsites/projects.

## Hazard Evaluation and Respirator Selection

Each job with potential for overexposure to airborne contaminants (or exposure to an oxygen-deficient atmosphere) shall be evaluated by the Kodiak Safety Director. This evaluation shall be used to determine:

- The type of hazard.
- The identity of the hazardous contaminants.
- Physical and chemical properties of the contaminants.
- Potential effects on the body.
- Representative airborne concentrations of the contaminants (both time-weighted average and short-term exposures, as appropriate).
- Established permissible or recommended exposure levels.
- Hazardous conditions that could be immediately dangerous to life or health (IDLH).
- Warning properties of the contaminants.

## Procedures

*Issuance of Respirators:*

- Issue of respiratory protection equipment shall be performed only by qualified representatives authorized to do so by the Kodiak Safety Director.
- Each respirator shall be inspected prior to issue to verify it is in good condition.
- Respiratory protection equipment will be provided to all affected Kodiak personnel at no cost.
- All Kodiak Personnel that may potentially be exposed to harmful vapors and oxygen deficient atmospheres shall be medically evaluated, receive respiratory protection training and shall be fit tested prior to the issuance of a respirator.

*Use of Respirators:*

- Respirators may be used only in accordance with the training provided.

- Respirators may be used only for the specific situation and contaminants for which the respirator was designed.
- A field inspection of each respirator shall be performed by the user before each use.
- A field test for leaks shall be performed by the user before each use.
    - Where respirators are required, each worker shall be issued a separate respirator.
    - Respirators are not to be shared.
    - Respirators shall be donned before entering the contaminated area and shall not be removed until after leaving the contaminated area.
    - Workers must leave the hazardous area to wash, change cartridges or if they detect break-through or resistance of their respirator.
    - Kodiak personnel are prohibited from entering and working an IDLH atmosphere.

*Maintenance of Respirators*

- Employees to whom respirators are issued shall store them in a location that is sanitary and protected against extreme cold, excessive moisture, exposure to damaging chemicals and mechanical damage.
- Sanitary wipes shall be used to sanitize respirators between uses within the same issue period.
- Respirators shall be stored in clean, sanitary, sealed plastic bags.
- When defects are observed during use or during inspections, the device shall be returned as soon as possible to the Kodiak Safety Director for repair or replacement.
- A respirator known to be defective shall not be used or allowed to remain in the field under any circumstances.

S*pecial Conditions*

- Mechanical or electronic speech transmission devices may be used only if they are NIOSH approved, are not placed inside the respirator or do not otherwise interfere with its operation.
- All confined spaces are considered IDLH until proven otherwise.
- Issuance of a respirator does not constitute authorization to enter a confined space.
- No entry into a confined space will be performed without a confined space entry permit approved by an authorized individual.
- Respirators will not be issued for routine use in low temperatures (below –18 degrees Celsius or 0 degrees Fahrenheit) or high temperature situations without special consideration.

# Y. HEARING CONSERVATION PROGRAM

### Policy

It is the policy of this company to institute an occupational hearing conservation program for our workers to prevent any temporary or permanent noise-induced hearing loss to employees, and to comply with OSHA Standards.

This written hearing conservation plan serves as a record of the details of the hearing conservation program in place at this company. We have this program in place to protect the hearing of all workers.

The elements of the hearing conservation program include:

- Monitoring,
- Audiometric testing program,
- Hearing Protection,
- Training and Information, and
- Recordkeeping.

The Safety Director listed in the company's IIPP has overall responsibility for coordinating safety and health programs in this company. The Safety Director is the person having overall responsibility for the Hearing Conservation Program and will review and update the program, as necessary.

Copies of the written program may be obtained from the Safety Director at his/her office.

### Monitoring

The monitoring program is in place to provide an ongoing means of determining employee exposure to noise and protect employees based on excessive exposure.

When information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels, Kodiak Roofing develops and implements an appropriate monitoring program to identify all employees for inclusion in the hearing conservation program and to select proper hearing protection.

Kodiak Roofing uses certified safety consultants and industrial hygienists to evaluate the noise levels in our company.

Kodiak Roofing notifies all employees exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring by signage indicating the need for and the appropriate type of hearing protection, and through training.

Kodiak Roofing provides an opportunity for affected employees or their representatives to observe any noise measurements conducted by notifying the staff of our intension to evaluate noise and the date and time of when it will take place.

Kodiak Roofing selects proper hearing devices for affected employees by determining what the noise level is of the equipment generating the noise, and providing hearing protection that will reduce the noise to tolerable levels, based on the amount of time employees are anticipated to operate such equipment.

Monitoring is repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that either additional employees may be exposed at or above the action level, or the attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of noise reduction.

The audiometric testing program is in place and available at no cost to all affected employees to ensure

that noise exposures are kept at proper levels.

### Audiometric Testing Program

The program ensures that a valid baseline audiogram is established for exposed employees within 6 months of their first exposure (or within one year if mobile vans are used, with employees wearing hearing protection for any period exceeding six months) by the following method:

- New employees subject to this standard will be required to submit to audiogram testing upon hire.

Audiometric testing is repeated annually thereafter.
Kodiak Roofing determines if standard threshold shift has occurred by comparing subsequent audiometric tests to the current ones. If subsequent audiometric testing of an employee whose exposure to noise is less than an 8-hour (time weighted average) TWA of 90 decibels indicates that a standard threshold shift is not persistent, Kodiak Roofing informs the employee of the new audiometric interpretation and discontinues the required use of hearing protectors for that employee.

### Hearing Protection

Kodiak Roofing makes hearing protectors available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees, according to the following method:

- The appropriate hearing protection is available at each individual machine or equipment generating noise that exceeds the standard. Standard earplugs are available to all employees near the main entrance to the shop/warehouse. Kodiak Roofing ensures use of available hearing protection by all affected employees by performing routine evaluations of the affected areas to determine if employees are using the appropriate hearing protection and using it properly.

Kodiak Roofing ensures that employees have a variety of suitable protectors that attenuate (lower) employee exposure at least to an 8-hour time-weighted average of 90 decibels, or 85 decibels or lower for employees who have experienced a standard threshold shift in their hearing. Kodiak Roofing has the following varieties of suitable hearing protection for employees to choose from:

- Standard Earplugs for the general work environment
- High Noise Level Earmuffs for direct exposure or operation of equipment

Kodiak Roofing ensures evaluation for adequacy of the hearing protection attenuation for the specific noise environments in which the protector will be used, according to specifications given in an appendix to the standard. Kodiak Roofing reevaluates attenuation whenever employee noise exposures increase to the extent that current hearing protectors no longer provide adequate attenuation, and then provides more effective hearing protection.

### Training and Information

This company has a hearing protection training program for all employees exposed to noise at or above an 8-hour time-weighted average of 85 decibels. Kodiak Roofing ensures employee participation in the hearing protection training program by providing initial safety orientation and holding annual safety meetings on the hearing conservation program
Kodiak Roofing makes copies of the standard available to affected employees or their representatives by maintain them in the Injury and Illness Prevention Program, which is available to all employees in The

Safety Director's office.
Kodiak Roofing repeats the training program annually, or whenever changes occur that affect our operations. Kodiak Roofing assures that the training material is updated to be consistent with changes in the protective equipment and work processes.
Training will consist of the following information:

- The effects of noise on hearing;
- The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care; and
- The purpose of audiometric testing, and an explanation of test procedures.

Kodiak Roofing makes informational materials pertaining to the Occupational Noise Exposure standard, supplied by OSHA, available to affected employees or their representatives through the use of postings and training.

## Recordkeeping

Recordkeeping is an essential element of the hearing conservation program, since it is the means by which hearing levels are tracked and assessed over a period of years. Kodiak Roofing has in place a series of measures to maintain comprehensive and up-to-date records.
Kodiak Roofing maintains accurate records of employee exposure measurements by documenting the noise levels in the affected employee's work area, and the annual audiometric testing of the employee.
Kodiak Roofing maintains accurate records of employee audiometric test records by maintaining a file for each affected employee that is specific only to the hearing conservation program.
Kodiak Roofing retains noise exposure measurement records and audiometric test records as required by OSHA. Kodiak Roofing provides access to records to employees, former employees, representatives designated by the individual employee, and OSHA, upon request.
In addition, when an employee experiences a standard threshold shift, the standard threshold shift is work-related, and the employee's total hearing loss equals or exceeds 25 dB from audiometric zero in the same ear(s) as the standard threshold shift, then the hearing loss case must be recorded on the OSHA 300 Log, in accordance with 29 CFR 1904.

# Z. STOP WORK AUTHORITY (SWA) POLICY

### Purpose
The purpose of this procedure is to provide an outline of site/project “stop work authority” for employees, contractors, and visitors.

### Scope
This procedure describes “stop work authority” program.

### Application
This procedure applies to all Kodiak employees, contractors/subcontractors and visitors.

### Policy and Program Overview
This program formally establishes the Stop Work Authority (SWA) of all Kodiak employees and contractors to stop individual tasks or group operations when the control of health, safety, or environment risk is not clearly established or understood.
It is the policy of Kodiak that:

- All employees and contractors have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health, safety, or environment risk exist;
- No work will resume until all stop work issues and concerns have been adequately addressed, and
- Any form of retribution or intimidation directed at any individual or company for exercising their authority as outlined in this program will not be tolerated.

As with any policy, accountability for non-compliance will follow established Kodiak disciplinary procedures.

### Roles and Responsibilities
Persons in the following roles have responsibilities in support of this program:

- Kodiak employees and contractors are responsible to initiate a “stop work” intervention when warranted, support the intervention of others and properly report all “stop work” actions.
- Forman/Supervisors are responsible to create a culture where SWA is exercised freely, honor request for “stop work”, work to resolve issues before operations resume, recognized proactive participation and ensure that all “stop work” actions are properly reported with required follow-up completed.
- Site Managers must establish the clear expectation to exercise SWA, create a culture where SWA is exercised freely, resolve SWA conflicts when they arise and hold those accountable that choose not to comply with established SWA policies.
- Kodiak’s Safety Director, in support of operations is responsible for monitoring compliance with the requirements of this program, maintenance of associated documents, processes and training materials, identification of trends, and sharing of lessons learned.

## Intervention Protocol

In general terms, the SWA process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe work actions or conditions.

Much like behavior-based safety processes, a workforce that clearly understands how to initiate, receive and respond to a "stop work" intervention is more likely to participate. Though obvious to some, the following protocol creates an environment where people know how to act and respond.

Though situations may differ, the following steps should be the framework for all stop work interventions.

Protocol Instruction Steps

- When a person identifies a perceived unsafe condition, act, error, omission, or lack of understanding that could result in an undesirable event, a "stop work" intervention shall be immediately initiated with the person(s) potentially at risk.
- If the supervisor is readily available and the affected person(s) are not in immediate risk, the "stop work action" should be coordinated through the supervisor. If the supervisor is not readily available or the affected person(s) are in immediate risk, the "stop work" intervention should be initiated directly with those at risk.
- "Stop work" interventions should be initiated in a positive manner by briefly introducing yourself and starting a conversation with the phrase "I am using my stop work authority because…" Using this phrase will clarify the users' intent and set expectations as detailed in this procedure.
- Notify all affected personnel and supervision of the stop work issue. If necessary, stop associated work activities, remove person(s) from the area, stabilize the situation and make the area as safe as possible.
- All parties shall discuss and gain agreement on the stop work issue.
- If determined and agreed that the task or operation is OK to proceed as is (i.e., the stop work initiator was unaware of certain facts or procedures) the affected persons should thank the initiator for their concern and proceed with the work.
- If determined and agreed that the stop work issue is valid, then every attempt should be made to resolve the issue to all affected person's satisfaction prior to the commencement of work.
- If the stop work issue cannot be resolved immediately, work shall be suspended until proper resolution is achieved. When opinions differ regarding the validity of the stop work issue or adequacy of the resolution actions, the Site Manager shall make the final determination.
- Positive feedback should be given to all affected employees regarding resolution of the stop work issue. Under no circumstances should retribution be directed at any person(s) who exercise in good faith their stop work authority as detailed in this program.
- All stop work interventions and associated detail shall be documented and reported as detailed in this program.

## Reporting

All "stop work" interventions exercised under the authority of this program shall be documented on the Kodiak Incident Investigation Report.

"STOP WORK" reports shall be reviewed by line supervision to:

- Measure participation;

- Determine quality of interventions and follow-up;
- Trend common issues and identify opportunities for improvement;
- Facilitate sharing of learning's;
- Feed recognition programs.

The Health and Safety department will regularly publish incident details regarding the number of "stop work" actions reported by location as well as details regarding common trends and learning's.

## Follow-Up

It is the desired outcome of any "stop work" intervention that the identified safety concerns be addressed to the satisfaction of all involved persons prior to resuming work. Although most issues can be adequately resolved in a timely fashion at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.
"Stop Work" interventions that required additional investigation or follow-up will be handled utilizing existing protocols and procedures for incident investigation and follow-up.

## Recognition

To build and reinforce a culture in which SWA is freely exercised and accepted, supervisors are encouraged to positively recognize employee and contractor participation in the program.
Minimally, each supervisor should informally recognize individuals when they exercise their authority to "stop work" or demonstrate constructive participation in a "stop work" intervention. This informal recognition need be no more than an expression of appreciation for a job well done or the awarding of a nominal item (hat, gloves, flashlight, etc.) or recognition. Additionally, formal recognition of selected examples of "stop work" interventions and those responsible shall be made during regularly scheduled safety meeting.

## Training

Training regarding this SWA Policy and Program will be conducted as part of all new employee and contractor orientations. Additionally, a review of the SWA Policy shall be completed as part of all field location safety briefings and regularly in safety meetings. Documentation of all training and reviews shall be maintained as per established procedures.
Stop Work Authority cards can be obtained by contacting the Kodiak Safety Director or a member of the Kodiak Safety Team.

**FRONT OF CARD**.

**DO IT SAFELY . . .**

KODIAK
ROOFING & WATERPROOFING CO.


***OR NOT AT ALL!***

*I have the authority & obligation to stop work if any unsafe condition exists or unsafe act occurs.*

***BACK OF CARD.***

***STOP WORK AUTHORITY***

- ***YOU** have stop work authority, and are expected to use it whenever you see something you believe to be unsafe.*
- ***YOU** are responsible for your own safety – don't do anything you believe to be unsafe.*
- ***YOU** have a responsibility for your co-worker's safety – don't let them do anything unsafe.*
- ***YOU** are responsible for reporting all safety incidents to your supervisor, including injuries or accidents you are involved in.*
- ***YOU** are expected to report all safety concerns to your supervisor or safety representative. If necessary, elevate the concerns through any other available avenues within the company.*

# AA. SHORT SERVICE EMPLOYEES (SSE) POLICY

### Introduction
This Program establishes Kodiak's requirements for Short Service Employees servicing our customers on construction sites. This Program will provide each manager with the tools necessary to provide for the well-being, health and safety of these Kodiak employees. Training will be provided in accordance with all applicable health and safety regulations.

### Purpose
The purpose of this Program is to identify, adequately supervise, train and manage Kodiak field employees (Short Service Employees) who have less than six months of experience, to prevent injury and harm to themselves, others, the property which they are constructing and the surrounding environment.

### Scope
All Kodiak field employees with less than six months of experience.

### Definitions
**Short Service Employee (SSE)**. A Short Service Employee is any Kodiak field employee who has less than six (6) months service in the same job / position with Kodiak.

**SSE Mentor**. Each SSE will be assigned an SSE Mentor(foreman). The Kodiak foreman assigned as a mentor will be an employee with at least one (1) year in the foreman job position working at various Kodiak work locations.

### Policy
Any Kodiak field employee who has less than 6 months of service in the same job/position with Kodiak is considered to be a SSE. Kodiak will ensure that the SSE is assigned to a crew consisting of a foreman assigned as a mentor, one journeyman and the SSE (Apprentice). Kodiak will periodically track the performance of the SSE and provide the necessary training as set forth in this Program.

### Responsibilities
The Safety Director will develop training for the SSE. The Safety Director or his/her designee will provide training or arrange for training with outside entities.

Kodiak will ensure that the SSE is assigned a mentor, periodically track the performance of the SSE and provide the necessary training as set forth in this Program.

The SSE will attend necessary training. He/she will follow instructions as set forth by the Kodiak foreman (mentor).

The Kodiak foreman assigned as mentor will train the SSE in the field in accordance with Health and Safety Regulations and company procedures designed to protect employees, the public and the environment from harm.

## Procedure

In addition to any training developed by Kodiak, the foreman or his designee will determine the customer's requirements for SSE's, e.g., notification, information required, training, etc.

The Kodiak foreman assigned as mentor will ensure that the affected Kodiak customer is notified of any SSE employee who may enter on a customer's site, before that employee begins any work for that customer. Approval will be secured from the customer's management before the SSE initially enters upon the customer's property. A single person crew cannot be an SSE and crew sizes of less than five shall have no more than one SSE.

The Kodiak foreman will complete any required forms related to Short Service Employees.

The Kodiak foreman assigned as mentor will give the SSE an orientation and tour of the customer's property. The tour will cover all work areas the SSE may encounter while working at the customer's facility. At a minimum, the foreman will cover all Kodiak plans related to the customer's property in addition to any required by the customer. Topics to be included, but not limited to the following:

- Site Specific Safety Plan
- JHA/PTP Review
- Proper Clothing and PPE
- Fall Protection Areas and Procedures
- Authorized Work Areas
- HAZCOM
- Lifting Techniques and Ergonomics
- Working Alone Procedures
- Severe Weather
- Correct Tools and the Proper use
- Environmental Concerns

The Job Hazard Analysis JHA will be dated and signed by the SSE, Kodiak foreman (mentor) and other crew members indicating that the SSE and crew has been through a site orientation.

The Kodiak foreman will ensure that each SSE receives training in the following:

- The hazards present at the customer's site
- The procedures, processes and personal protective equipment developed and to be used to prevent these hazards from causing injuries, property damage and environmental incidents, and
- The skills necessary to conduct his assigned jobs safely and efficiently while providing product quality and economy.

After training the Kodiak foreman assigned as mentor will ensure that the SSE has a clear understanding of the topics and the skills necessary to perform his job in a safe and responsible manner. The Kodiak foreman will ensure that each SSE receives training in accordance with this plan before starting work, when:

- The SSE is first hired.
- The SSE is assigned to a new job.
- The SSE may be exposed to new substances, procedures, location, and processes that may present a new hazard to the SSE.

The Kodiak foreman assigned as mentor will provide close supervision and not permit the SSE to perform any task for which he has not been properly trained. The Kodiak foreman will ensure that the SSE understands the tasks to be performed, the associated hazards and risks, and how to perform the job safely and responsibly.

A performance review will be conducted within three months of being designated an SSE. Input will be submitted by the assigned SSE Mentor for consideration. At the end of the six-month period the SSE will have another performance review with input from the assigned SSE Mentor.

Upon review, the SSE designation may be removed or extended. To remove an SSE from SSE status, the SSE must convince the Kodiak foreman and safety department that he/she has a good working knowledge of both Kodiak's and the customer's health, safety, and environmental policies, demonstrated by a familiarity with the safety and environmental concerns of the jobsite. They must also have demonstrated safe and responsible work for the past six (6) months. Only after meeting these prerequisites may an employee be removed from the SSE process.

## Recordkeeping

The Kodiak foreman will maintain a file of all SSE's assigned to his work area. He/she will forward a copy of all documentation to the Safety Director. The Safety Director will also maintain a copy of all documentation related to SSE's.

# BB. FLEET SAFETY

**Policy**

Our motor fleet safety program has been implemented to promote safe driving on and off the job. When properly implemented, this program can help reduce the frequency and severity of crashes and violations in our vehicle operations. Our focus is on reducing the financial burden of crashes and the accompanying human suffering. It is equally important that we present a strong public image of a company that puts safe drivers on the road.

We will properly select and train employees who drive on company business and we will keep well-maintained vehicles. The responsibility for managing vehicle and driver safety issues has been assigned to:

The Company's Safety Director

He/she has authority to implement our vehicle safety program and is accountable to upper management. This program has been designed to address vehicles driven by or for:

- Sales Personnel
- Delivery/Transport Operations
- Vehicle operations within the scope of employment with this company

A list of employees authorized to operate motor vehicles on company business will be maintained by the fleet coordinator. Employees are not allowed to operate motor vehicles on company business unless they are on the list of approved drivers. Supervisors are responsible for verifying an employee is on the list of approved/authorized drivers prior to assigning the employee to work tasks that involve the operation of a motor vehicle on company business.

Employees are required to immediately report all crashes and moving violations that occur during work-related activities, if they are driving a company-owned, rented or leased vehicle used for company business or a personal vehicle being operated on company business.

We will provide safe and reliable transportation to authorized drivers, and the resources for properly maintaining company vehicles. It is each driver's responsibility to ensure proper vehicle maintenance, exercise defensive driving habits, maintain a good driving record, and adhere to the company safe driving expectations and objectives of this program.

Employees who are authorized to drive personal vehicles on company business are expected to maintain their vehicles in safe operating condition, as well as provide the fleet coordinator with proof of liability insurance with minimum coverage that aligns with corporate risk management philosophy. All occupants of company vehicles and occupants of personally owned vehicles driven on company business must wear seatbelts/restraints at all times.

We will adhere to all federal, state, and local laws governing vehicle operation.

The framework of this program is comprised of the following elements:

- Management Position and Statement of Policy
- Company Safety Rules & Regulations
- Supervisors' Roles & Responsibilities
- Screening & Hiring Procedures
- Vehicle Inspection & Maintenance
- Driver Training
- Collision Reporting & Investigation Procedures

## Supervisors Roles and Responsibilities

The company recognizes the value that supervisors can add to the effectiveness of a Fleet Safety Program. Supervisor-level personnel must also recognize the importance of their roles in the program. Supervisors will be the person designated to administer many facets of this program. Supervisors will be the initial points for application to the program and monitoring of the employees' progress throughout the screening and qualifying process. Supervisors will also have the responsibility of maintaining personnel and vehicle records.

The Fleet Safety Coordinator will be responsible for the following aspects of driver selection and training:

- Participate in new driver selection process.
- Conduct initial training of new drivers.
- Conduct in-service training for existing drivers.
- Receive accident/incident reports.
- Investigate and review accidents and incidents involving company vehicles and/or company drivers.
- Monitor vehicle inspections and maintenance records.

## Screening and Hiring Procedures/Qualifications

Hiring competent, qualified people for positions that will require driving on company business greatly reduce a company's risk. Organizations should aggressively screen individuals for drivers. This will rule out those who should not drive company vehicles or drive on company business time.

## Driver Qualifications Standards

All persons who will operate company vehicles or will operate their own vehicle in the scope of employment must meet the following minimum qualifications:

- The employee must be at least 20 years of age to qualify for the company's insurance program requirements.
- The employee must have a current, valid driver license issued by the state in which he or she resides.
- Employees who will be operating commercial class vehicles will have a current, valid CDL, or will be able to obtain one before driving company owned commercial class trucks.
- **Employees operating commercial vehicles must possess valid endorsement(s) for the type(s) of vehicle(s) operated**
- All prospective company drivers will furnish their supervisor with a recent Moving Violation Record or Motor Vehicle Record (MVR).

## Motor Vehicle Record Check

The Motor Vehicle Record (MVR) is a list of moving violations and crashes reported against a driver's license number for the past three to five years, in most states. The prospective driver may provide, in writing, a copy of their MVR once employment has been offered. A copy may be obtained, for a small fee, with the employee's permission by writing to the proper state Department of Motor Vehicles.

Drivers with unacceptable driving records, may be subject to having job review and possible removal from positions requiring driving.
Drivers are required to report any crashes or moving violations to their supervisor immediately following the occurrence (including those occurrences while driving a personal car while on company business and violations in the personal vehicle on their own time). Drivers are responsible for notifying their supervisor of final outcomes of violations. When reviewing driving records to verify an employee meets our driving record criteria all motor vehicle violations and convictions will be used. This includes violations in personal vehicles on personal time.
As a condition for the privilege to drive on behalf of the company, an MVR will be obtained via California DMV pull program for California employees and quarterly for Nevada employees.
The following criteria will be utilized based on an employee's Motor Vehicle Record (MVR) in determining the eligibility of Kodiak employees to be assigned to drive a vehicle on company business:

| **Type "A" Violations** | **Type "B" Violations** |
|---|---|
| Driving Under the Influence of Alcohol or Drugs | Speeding 1-14 mph over the posted limit |
| Refusing to take a substance test | Improper lane change |
| Driving with an open container (alcohol) | Failure to yield |
| Fleeing or evading police or a roadblock | Using a cell phone without a hands-free feature |
| Racing/Speed contest | Texting while driving |
| Reckless/Careless Driving | Failure to Obey traffic signals or signs |
| Speeding (in excess of 14 mph over the posted limit) | Accidents |
| Hit & Run | Having a license suspended in the past related to moving violations |
| Resisting Arrest | Driving on a suspended or revoked license |
| Vehicular assault | |
| Homicide or manslaughter or using a vehicle in connection with a felony | |

Employees with a Type "A" driving violations within the past five (5) years are not eligible to drive for Kodiak.
Employees with three (3) or more Type "B" violations or two or more at fault accidents within the past three (3) years are not eligible to drive for Kodiak.
Employees with two (2) moving Type "B" driving violations or one (1) driving accident in a three (3) year period will be put on warning. MVRs will be requested more frequently in these cases.
Any employee operating personal vehicles for company business shall comply with the following:

- Must possess a current Driver's License that is valid for the type of vehicle they are operating.
- MVRs must be reviewed and compared with the driver eligibility criteria (see above)
- Any employee who operates their personal vehicle on company business must carry liability insurance as required by State Law to equal or exceed the state minimum financial responsibility law or $300,000. combined single limits whichever is greater.
- Kodiak must be named as an additional insured on the personal insurance policy of employees that regularly drive their personal vehicle on company business.
- Personal vehicles used for company business shall be inspected for proper maintenance and safety. These inspections shall be documented weekly using the Driver's Vehicle Inspection Report provide by Kodiak.

## Vehicle Inspection and Maintenance

Employees operating company vehicles are expected to make a safety check on their vehicle before driving. The inspection should include, at a minimum, lights, horn, turn signals, brake lights, oil level, coolant level, tire pressure and condition, and adjustment of rearview mirrors. The operator should complete a vehicle condition report per the schedule required by the driver's manager.

All maintenance including oil changes, lubrication, repair, parts, etc., will be recorded on an up to date vehicle maintenance log, which will be kept in the glove compartment of each vehicle. All scheduled maintenance will be in accordance with the vehicle manufacturer's recommendations. All repair needs must be highlighted and brought to the immediate attention of the Fleet Safety Coordinator.

Maintenance of personal vehicles used for company business is the responsibility of the owner. The company reserves the right to inspect a personal vehicle at random and will subject that vehicle to the same safety criteria as with company owned vehicles. Reports will be retained by the company and kept in the personnel file of the owner/driver.

## Markings and Placards

- Applicable markings/placards that are required to be placed on vehicles based on jurisdictional requirements
- Hazardous Materials shipping papers shall be properly prepared and retained for the specified period based on jurisdictional requirements

## Driver Training

Once an applicant has met the initial qualifications to become a company driver, they will be certified in the vehicle or type of vehicle they will operate. The Fleet Safety Coordinator or designated trainer will administer a written test to determine competency and knowledge of vehicle operating principles. **This includes training in transportation of hazardous materials and how employees will be trained on those exposures based on jurisdictional requirements.** Management will also determine if the driver understands basic traffic laws. A written test will be followed up with a practical evaluation or "Record of Road Test." The road test will be comprised of both urban and open highway environment situations.

The examiner will watch particularly for inattention to traffic and road conditions, aggressive driving behaviors, and courtesy towards other drivers and pedestrians.

## Driving Behaviors/Complaints

Kodiak employees granted the privilege of driving Kodiak vehicles shall operate vehicles in a safe and courteous manner consistent with the intent of local and state traffic laws and regulations. Public complaints of unsafe, reckless, dangerous or unlawful driving by Kodiak personnel will be taken seriously and will be investigated by the Kodiak safety director and/or Kodiak Health and Safety Advisory Committee as needed. Any employee found driving a company vehicle in an unsafe or reckless manner or without the proper paperwork on file at the office, will be subject to disciplinary action up to and including discharge.

Kodiak drivers who receive two (2) or more complaints within a three (3) month period will be subject to disciplinary action which may include a written warning, remedial driver training, loss of driving privileges

and/or discharge. Disciplinary actions will be determined by the Kodiak Operations team in consultation with the Human Resources and Kodiak Safety teams as needed. Complaints will be documented and retained by the Kodiak safety director.

## Collision Reporting, Investigation & Discipline

Inevitably, accidents do occur. When they do, it is important to investigate them in a timely manner. Should an employee be involved in an accident, the most important obligation is treatment of injured persons.

Secondary, is the notification of the owners of any damaged property, vehicles, etc. Reporting accidents to company management is also critical so that insurance companies may be notified and an investigation be conducted.

Employees expected to contact the police and have an accident report filed anytime they are involved in an accident. Accident Reporting Kits must be maintained in the glove box of every vehicle. This will help reduce or prevent future liability if the driver was not at fault.

Accident investigations should be performed as soon as possible to determine what factors contributed to it. Once the causal factors have been determined, management shall take action to prevent a similar incident from recurring.

It is important, during the review process, that investigators remain impartial and objective. The review should focus on whether the accident was preventable. The establishment of a procedure to review accidents and determine their causes and recommend correction is critical if future losses are to be prevented.

An accident review board or committee is one of the more effective tools to do this. The committee should be comprised of managers, supervisors, and a neutral party who may be unfamiliar with the accident or the employee who was involved. If the accident review committee determines that the driver's actions contributed or caused the accident, it is imperative that corrective action be taken. The goal should be to improve the driver's deficiencies.

If disciplinary action is decided upon, it is important that the action be documented to provide a foundation for future actions should the driver be involved in additional accidents.

## Driver Fatigue Management

Once an applicant has met the initial qualifications to become a company driver, they will be trained in Driver Fatigue. The Fleet Safety Coordinator or designated trainer will train the driver on driver fatigue policy.

Drivers shall not drive while fatigued:

- Drivers may not drive after the 14th hour after coming "on-duty" following an 8-hour rest break. NOTE: Time as a "passenger" does not count towards the 14 hour on-duty time.
- May not drive consecutively more than 3 hours, or 200 miles on any single trip. A minimum of a 15 minute break is required for a driver to continue beyond 3 hours or 200 miles.
- When transporting multiple passengers, at least ONE passenger is required to stay awake and maintain communications with the driver.

# CC. SLING & RIGGING WORKPLACE SAFETY PROGRAM

## Policy

The purpose of this safety policy and procedure is to establish the methods and guidelines for the safe use of slings throughout Kodiak Roofing. Slings, a component of hoisting and rigging systems, are used to lift and move loads. In Kodiak Roofing, alloy steel chain, wire rope, natural and synthetic fiber rope, and synthetic web slings are typically used. Slings are capable of lifting tremendous loads.

This safety policy and procedure provides guidelines for implementing an effective safe sling use program. It includes provisions for training, recognizing the types of slings used in Kodiak Roofing, understanding the attachments used with slings, and inspecting slings. Additionally, it presents information on sling repair requirements and subsequent removal from service.

It is the policy of Kodiak Roofing is to provide a place of employment free from recognized hazards that cause or are likely to cause death or serious physical harm to employees or the public. Therefore, to minimize and eliminate material lifting hazards, properly rated slings that are not damaged or defective will be used in Kodiak Roofing. When hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding Slings will be implemented. These measures will be implemented to minimize those hazards to ensure the safety of employees and the public.

## Responsibilities

It is the responsibility of each manager/unit head, supervisor and employee to ensure implementation of [COMPANY]'s safety policy and procedure on Slings. It is also the responsibility of each Kodiak Roofing employee to report immediately any unsafe act or condition of equipment to his or her supervisor.

## Managers/Unit Heads

Managers/Unit Heads are responsible for ensuring adequate funds are available for the purchase of chains and slings for their areas. They will also be responsible for identifying the employees affected by this safety policy and procedure. Managers/Unit Heads will obtain and coordinate the required training for the affected employees. Managers/Unit Heads will also audit their safe sling use program to ensure effective implementation with this safety policy and procedure.

## Supervisors

Supervisors. Every six months, supervisors or a designated employee will inspect all slings in their work area for wear and for defects in composition and welds. Supervisors will ensure that defective or damaged slings are removed from service. Supervisors will also ensure that employees are provided with the appropriate Personal Protective Equipment (PPE) as necessary for their job (e.g., foot, hand, or eye protection as necessary).

## Employees

Employees shall comply with all applicable training. Additionally, employees shall report all damaged slings and/or unsafe conditions to their supervisors.

## Safety and Loss Control

Safety and Loss Control. Safety and Loss Control will provide prompt assistance to managers/unit heads, supervisors, or others as necessary on any matter concerning this safety policy and procedure. Additionally, Safety and Loss Control will assist in developing or securing the required training. Safety and Loss Control will work with Purchasing to ensure that all newly purchased slings comply with this safety policy and procedure. Additionally, Safety will provide consultative and audit assistance to ensure the safe use of slings.

## Equipment Issue

Central Equipment unit shall maintain an adequate supply of appropriate slings. Central Equipment Unit will ensure that all components are delivered with the appropriate manufacturer's certification.

## Training

Employees who use slings will be trained in:

- Types of slings
- Applications and limitations of the various types of slings
- Inspection procedures for slings
- Removal of slings from service

These employees will be trained upon initial employment or upon new job assignment. Subsequent training will be determined by employee's supervisor.

Selection and Use of Sling Types

Several types of slings are used throughout Kodiak Roofing and include:

- Alloy Steel Chain Slings
- Wire Rope Slings
- Natural and Synthetic Fiber Rope Slings
- Synthetic Web Slings

Sling selection for a particular task is based on:

- Rated capacity of the sling• Nature of the task
- Amount of weight required to be lifted, hoisted or moved

The user should determine that the sling is being used in accordance with rated capacity as listed in the manufacturer's catalog. The alloy steel chain, wire rope and fiber rope slings are typically used where sling damage to the load is not critical. Synthetic web slings are ideal where sling damage to a load is not acceptable.

Alloy chain slings will have permanent identification affixed to the sling indicating the size, grade, rated capacity, and reach of the sling. Untagged slings will be removed from service. Alloy steel chains and chain slings should not be heated above 600 degrees after being received from the manufacturer.

Wire rope slings must be proof-tested by the manufacturer to ensure quality. A certificate verifying rated capacity will accompany each wire rope sling. This certificate must be available for review.

Synthetic web slings must be marked or coded to show the rated capacities for each type of hitch, type of web material, and manufacturer. Additionally, synthetic web slings must not be exposed to fumes, vapors, sprays, mists, liquid acids, liquid phenolics, or liquid caustics.
Equipment Inspections are conducted to ensure specific safety equipment is in good working order and will function when needed. Examples and frequencies are:

### Attachments

All attachments including hooks, rings, oblong links, pear shaped links, and welded link components will be rated at least at the capacity of the sling itself. Makeshift links or other shop fabricated attachments will not be used. Slings twisted more than 10 degrees from the plane of the unbent hook will not be used.

### Inspections

Slings will be inspected each day prior to use. Any visual defect will be reported. Damaged slings will not be used. In severe conditions (e.g., temperature, corrosion, etc.), slings will be inspected throughout the day. Alloy chain slings will be inspected every six months by a supervisor or designated employee for wear and defects in composition and welds. This inspection will consider not only the physical aspects, but also the total service life of the slings. This inspection will be recorded and maintained on file with the date of the inspection and name and signature of the employee performing the inspection.

### Sling Repair

Slings must be in good condition and not damaged or defective to ensure safe and reliable use. If slings are worn, damaged or defective they shall not be used. If the slings are believed to be repairable, then those slings will be returned to the sling manufacturer for repairs. The manufacturer must proof-test all repaired slings before they are accepted for reuse. Under no circumstances will employees attempt to repair slings for reuse. Broken links or attachments on steel alloy chain slings will not be repaired using mechanical coupling links. Additionally, any sling with temporary repairs will not be used.

### Removal From Service

If slings are damaged or defective, they shall not be used. Until repairs are made on defective or damaged slings, they will be removed from service. If these slings are not repairable, they will be permanently removed from service. Appendix G lists the conditions that must be present to remove any sling from service.

### Safe Sling Use

The following procedures will be followed when using Slings:
- Slings damaged or defective will be removed from service.
- Slings will not be shortened with knots or bolts or other makeshift devices.
- Sling legs will not be kinked.
- Slings will not be loaded beyond their rated capacity.
- Slings used in a basket hitch will have the loads balanced to prevent slippage.
- Slings will be securely attached to their loads.

• Slings will be padded or protected from the sharp edges of loads.
• Suspended loads will be kept clear of obstructions.
• All employees will be kept clear of loads about to be lifted and of suspended loads.
• Hands or fingers will be kept clear of loads and not placed between the load and the strap.
• Shock loading will not be allowed.
• Slings will not be removed while loads are resting on the sling.

Natural and Synthetic Fiber Rope Slings Splices

The use of natural and synthetic fiber rope slings utilizing splices will not be used unless the following requirements for design are met:

• In manila rope, eye splices will consist of at least three full tucks, and short splices will consist of at least six full tucks, three on each side of the splice center line.
• In synthetic rope, eye splices will consist of at least four full tucks, and short splices will consist of at least eight full tucks, four on each side of the center line.
• Strand end tails will not be trimmed flush with the surface of the rope immediately adjacent to the full tucks. This applies to all types of fiber rope and both eye and short splices. For fiber rope under one inch in diameter, the tail will project at least six inches beyond the last full tuck.
• Fiber rope slings will have a minimum clear length of rope between eye splices equal to ten times the rope diameter.
• Knots will not be used in lieu of splices.
• Clamps not designed specifically for fiber ropes will not be used for splicing.
• For all eye splices, the eye will be large enough to provide an angle of not greater than 60% at the splice when the eye is placed over the load or support.

## Wire Rope and Wire Rope Slings Inspection Procedure

The following information is to be used as a guide for inspecting wire rope and wire rope slings. Inspection frequency should be based on safety factors, property damage, and the cost of replacing destroyed or damaged goods and material dropped due to the use or misuse of improper or damaged wire rope and slings. Additionally, slings should be inspected at regular intervals. This interval should be determined by the user and is dependent upon the particular use of the sling and Kodiak Roofing safety requirements. A sling should be inspected after any unusual situation that may have damaged it, such as overload, accident, or fire. It should not be returned in service until continued safe operation has been verified. Each sling should have a serial number. If no number is available, a tag should be attached at the time of inspection. This number should be listed on the inspection report. Inspection should be performed only by persons with sufficient experience and knowledge to properly apply the criteria for rejection. The following should be considered criteria for rejection:

• Randomly Distributed Broken Wires in One Rope Lay: There should be no more than 10 broken wires in one lay for the entire length of the sling.
• Broken Wires in One Strand of One Rope Lay: There should be no more than five broken wires in any one strand (single wire) of any one rope lay.
• Abrasion: There should be no wearing, scrubbing, or preening of any outside wire causing the reduction of the diameter of a single wire by more than 1/3.

• Kinking and/or Crushing: There should be no kinking, crushing, or other damage that results in detrimental distortion of the rope structure.
• Bird Caging: There should be no opening or unlaying of the rope lays nor should the fiber core of the rope be exposed.
• Heat Damage: There should be no evidence of heat damage including bare electrical conductor, grounding, or welding arc.
• Corrosion: There should be no evidence of pitting or heavy coating of rust due to corrosion.
• Reduced Diameter: There should not be any reduction of the diameter of the rope along the main length or of any section (overloading or contact with sharp edges of load without permission).
• End Attachments: There should be no evidence of cracks, deformity, excessive corrosion, or excessive wear of the fittings forming the splice or socket.
• Hooks and Rings: Check for throat opening (no more than 15% stretch), twist (no more than 10%), cracks (none), and corrosion.

### Chain and Chain Sling Inspection Procedure

A good chain and chain sling inspection program should provide more than a physical check of the chain's condition. It should be a complete recorded history of each unit.
Remove from service for the following:

- Missing or illegible sling identification tag
- Cracks or breaks
- Stretched chain
- Excessive abrasion
- Excessive wear (check bearing surfaces)
- Twists
- Bent or deformed links or sling components
- Evidence of exposure to excessive heat
- Pitting or corrosion
- Weld splatter
- Not having the flexibility for all components to move freely
- Any visual condition that causes doubt for continued use
- All hardware and/or attachments must be visually inspected in accordance with the hardware and/or attachment pre-use inspection guidelines.

# IV. CODE OF SAFE PRACTICES

## A. GENERAL OFFICE PERSONNEL

It is Kodiak policy that everything possible will be done to protect employees, customers and visitors from accidents. Safety is a cooperative undertaking requiring participation by everyone. Failure of any employee to comply with safe practices, policies and rules will be grounds for corrective discipline. Managers and Supervisors shall insist that employees observe all applicable Company, local, State and Federal safety rules, regulations and practices and take action as is necessary to ensure compliance. Implementation of these policies requires all employees to:

- Report all unsafe conditions and equipment to your supervisor or safety coordinator. (FORM IIPP-7)
- Report all accidents, injuries and illnesses to your supervisor or safety coordinator immediately. (FORM IIPP-7)
- "Close calls" or near accidents, which do not result in injuries, shall be reported so that preventive measures may be taken. (FORM IIPP-8)
- Means of egress shall be kept unblocked, well lighted and unlocked during work hours.
- Only trained workers may attempt to respond to a fire or other emergency.
- Exit doors must comply with fire safety regulations during business hours.
- Stairways should be kept clear of items that can be tripped over and all areas under stairways that are egress routes should not be used to store combustibles.
- Materials and equipment will not be stored against doors or exits, fire ladders or fire extinguisher stations.
- Aisles must be kept clear at all times.
- Work areas should be maintained in a neat, orderly manner. Trash and refuse are to be thrown in proper waste containers.
- All spills are to be wiped up promptly.
- Files and supplies should be stored in such a manner as to preclude damage to the supplies or injury to personnel when they are moved. Heaviest items should be stored closest to the floor and lightweight items stored above.
- All cords running into walk areas must be taped down or inserted through rubber protectors to preclude them from becoming tripping hazards.
- Never stack material precariously on top of lockers, file cabinets or other high places.
- Never leave lower desk or cabinet drawers open that present a tripping hazard. Use care when opening and closing drawers to avoid pinching fingers.
- Do not open more than one upper drawer at a time; particularly the top two drawers on tall file cabinets.
- Always use the proper lifting techniques – using the large muscles of the legs rather than the small muscles of the back.
- Avoid twisting the back when carrying items.
- Avoid lifting or pushing any item that exceeds 50 pounds.
- Employees must use a dolly, cart or other equipment to minimize the possibility of injuries when it is necessary to move an item exceeding 50 pounds.

- When carrying material, caution should be exercised in watching for and avoiding obstructions, loose material, etc.
- Inappropriate clothing, including footwear or shoes with thinly or badly worn soles, shall not be worn.
- All electrical equipment should be plugged into appropriate wall receptacles or into an extension cord of similar size and capacity. Three-pronged plugs should be used to ensure continuity of ground.
- Individual heaters at work areas should be kept clear of any combustible materials. Heaters equipped with tip-over switches should be used.
- Appliances such as coffeepots and microwaves should be kept in working order and inspected for signs of wear, heat, and fraying of cords.
- Fans used in work areas should be guarded. Guards must not allow fingers to be inserted through the mesh. Newer fans are equipped with proper guards.
- Equipment such as scissors, staples, etc., should only be used for their intended purposes and should not be misused as hammers, pry bars, screwdrivers, etc. Misuse can cause damage to the equipment and possible injury to the user.
- Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other small places that receive little ventilation, unless it has been determined by an appropriate authority that it is safe to enter.
- Cleaning supplies should be stored away from edible items on kitchen shelves.
- Cleaning solvents and flammable liquids should be stored in appropriate containers.
- Solutions that are hazardous or are not intended for consumption should be kept in properly labeled containers.
- Employees shall observe and obey all traffic laws while driving Kodiak or personal vehicles while on company business.
- Periodic inspections of work areas will be conducted to ensure that all Code of Safe Practices are being followed.

## B. WAREHOUSE PERSONNEL

It is Kodiak policy that everything possible will be done to protect employees, customers and visitors from accidents. Safety is a cooperative undertaking requiring participation by every employee. Supervisors shall insist that employees observe all applicable Company, State and Federal safety rules and practices and take action as is necessary to ensure compliance. Failure of any employee to comply with safe practices, policies or rules will be grounds for corrective discipline. Implementation of this policy requires all employees to:

- Report all unsafe conditions and equipment to your supervisor or Safety Director. (FORM IIPP-7)
- Report all accidents, injuries and illnesses to your supervisor or safety coordinator immediately. (FORM IIPP-7)
- “Close calls” or near miss accidents, which do not result in injuries, shall be reported so that preventive measures may be taken. (FORM IIPP-8)
- Means of egress shall be kept unblocked, well lighted and unlocked during work hours.
- Only trained workers may attempt to respond to a fire or other emergency.
- Exit doors must comply with fire safety regulations during business hours.

- Stairways should be kept clear of items that can be tripped over and all areas under stairways that are egress routes should not be used to store combustibles.
- Materials and equipment will not be stored against doors or exits, fire ladders or fire extinguisher stations.
- Aisles must be kept clear at all times.
- Work areas should be maintained in a neat, orderly manner. Trash and refuse are to be thrown in proper waste containers.
- All spills are to be cleaned up promptly.
- Equipment and materials should be stored in such a manner as to preclude damage to the equipment or materials and to prevent injury to personnel when moved. Heaviest items should be stored closest to the floor and lightweight items stored above.
- All cords running into walk areas must be taped down or inserted through rubber protectors to preclude them from becoming tripping hazards.
- Never stack materials or equipment precariously on top of shelves, storage cabinets or other high places.
- Always use the proper lifting techniques – using the large muscles of the legs rather than the small muscles of the back.
- Avoid twisting the back when carrying items.
- Avoid lifting or pushing an object that exceeds 50 pounds.
- Employees must use a dolly, cart or other equipment to minimize the possibility of injuries when it is necessary to move an item(s) exceeding 50 pounds.
- When carrying material, caution should be exercised in watching for and avoiding obstructions, loose material, etc. that can cause tripping.
- Work-boots are required. Cut-offs, shorts, sleeve-less shirts are prohibited.
- Safety glasses are required while operating machinery or equipment.
- Employees shall be trained in the proper procedures for operating shop equipment and machinery prior to being assigned to operate said equipment.
- Personnel operating the metal brake shall not use gloves with rubber palms. Leather gloves with the fingers cut off at the center knuckle are preferred.
- Employees operating the metal shear or brake shall avoid all distractions (talking with other personnel, taking eyes off equipment, etc.) while operating this equipment.
- Inspect guards, shields, safety interlocks and other safety devices prior to using equipment or machinery.
- Do not disable or bypass guards, shields, interlocks or other safety features on equipment and machinery. Report any unsafe conditions immediately to management and/or the Safety Director.
- When servicing or repairing machinery or equipment, Lockout/Tag-out procedures shall be followed to prevent equipment and machinery from being energized inadvertently.
- Welding masks/hoods, gloves long-sleeve shirts or aprons shall be used when operating welding equipment.
- Guards or curtains shall be used while welding to prevent other warehouse personnel, visitors from watching the arc or flame.

- All electrical equipment should be plugged into appropriate wall receptacles or into an extension cord of similar size and capacity. Three-pronged plugs should be used to ensure continuity of ground.
- Fans used in work areas should be guarded. Guards must not allow fingers to be inserted through the mesh. Newer fans are equipped with proper guards.
- Tools such as screw drivers, wrenches, etc., should only be used for their intended purposes and should not be misused as hammers, pry bars, etc. Misuse can cause damage to the tools and possible injury to the user.
- Cleaning solvents and flammable liquids should be stored in approved containers and shall be appropriately identified,
- Temporary containers used for hazardous chemicals must be designed for that purpose.
- Employees are prohibited from using food/drinking containers as temporary containers for chemicals (i.e. water bottles, sport drink containers, soda cans, milk bottles etc.).
- Employees shall cleanse thoroughly after handling hazardous substances and follow special instructions from authorized sources.
- Employees shall observe and obey all traffic laws while driving Kodiak or personal vehicles while on company business.
- Periodic inspections of work areas will be conducted to ensure that all Code of Safe Practices are being followed.
- Personal radios, or music playing devices i.e. ipods, mp3players, cell phones, with headphones, earbuds etc. are prohibited from being used while working as these devices may distract or prevent the user from hearing dangerous equipment or machinery and/or hearing important instructions or warnings.

## C. FIELD PERSONNEL

It is Kodiak policy that everything possible will be done to protect employees, other construction tradesmen visitors from accidents. Safety is a cooperative undertaking requiring participation by every employee. Supervisors shall insist that employees observe all applicable Company, State and Federal safety rules and practices and take action as is necessary to ensure compliance. Failure by any employee to comply with safe practices, rules and policies will be grounds for corrective discipline. Implementation of this policy requires employees to:

- Report any and all unsafe conditions or practices to the job foreman, superintendent or Safety Director promptly. Reporting may be done anonymously if necessary forms are available from supervisors or at the office. (FORM IIPP-7)
- All injuries must be reported promptly to the foreman/supervisor so that arrangements can be made for medical or first aid treatment.
- Report all accidents, injuries and illnesses to your supervisor or Safety Director immediately. (FORM IIPP-5, IIPP-5.5)
- “Close calls” or near accidents, which do not result in injuries, shall be reported so that preventive measures may be taken. (FORM IIPP-8)
- At all job sites prior to work commencing, the superintendent, or job foreman must review, inspect, and anticipate possible hazards and take proper safety precautions to reduce risk of injury to employees. (FORM IIPP-4)

- Keep your eyes and ears open and use common sense while working on the job site.
- Job foremen or superintendents shall ensure that all employees are given accident prevention instruction through weekly Toolbox Tailgate/Safety Training meetings. Safety topics will be provided to the job foremen or superintendents by the Safety Director.
- Work will be planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
- An appropriate fire extinguisher is to be available on all projects when hot work is performed or where potential fire hazards exist.
- Horseplay, scuffling, improper use of equipment and other acts which tend to have any adverse influence on the safety or well-being of employees is prohibited.
- No employee shall knowingly be permitted or required to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury.
- Anyone known to be under the influence of drugs, prescription or illegal, or intoxicating substances which impair the employee's ability to safely perform the assigned duties shall not be allowed to work while in that condition.
- No smoking is allowed in the work area.
- Work boots are required on all Kodiak job sites. Inappropriate footwear or tennis shoes or work boots with worn out soles are prohibited.
- Safety Glasses are required on all Kodiak job sites
- Protective gloves, masks, and eye protection are to be worn when handling solvents and flammables.
- Suitable hard hats shall be provided and must be worn by all roofers.
- Hard hats will be inspected periodically for damage to the shell and suspension system. Damaged hard hats will not be worn and will be replaced or repaired before they are worn again.
- Work shall be arranged so that employees are able to face ladders and use both hands while climbing.
- Damaged ladders are not to be used and should be returned to the shop for repair. Proper use of ladder shall include angle (ladder base to be ¼ the working length of ladder), firm level surface, extension 3' above roof, and anchored at rooftop and at the base to prevent movement during use.
- Any damage to scaffolds, false-work, or other supporting structures shall be immediately reported to the supervisor or foreman and repaired before use.
- Barricades or a warning line system, and/or personal fall arrest system shall be used when working close to roof edges over 6' above lower surface. Warning Lines shall be no closer than 6' from the leading edge and shall include rope with flags no more than 6' apart.
- Knotted hand lines shall not be used.
- Warning cones must be placed around crane stabilizers to avoid toe injuries.
- Hard hats must be worn when the crane is in operation.
- Rigging straps/chains must be securely fastened over-load with the weight of the load not exceeding capacity.
- Crane operations require that a clear means of communication be established prior to commencement of the operations either through hand signals or dedicated radios.

- Work areas shall be kept clean and free from debris.
- Personal radios, or music/podcast playing devices (ipods, mp3players, cell phones, with headphones, earbuds etc.) are prohibited from being used while working as these devices may distract or prevent the user from hearing dangerous equipment or machinery and/or hearing important instructions or warnings.
- Standing on or in dumpsters is prohibited. When appropriate, chutes from roofs to dumpsters must be used.
- Cleaning solvents and flammable liquids should be stored in approved containers and shall be appropriately identified,
- Temporary containers used for hazardous chemicals must be designed for that purpose.
- Employees are prohibited from using food/drinking containers as temporary containers for chemicals (i.e. water bottles, sport drink containers, soda cans, milk bottles etc.).
- Employees shall cleanse thoroughly after handling hazardous substances and follow special instructions from authorized sources.
- If a crew is required to work in an area where there may be exposure to known toxic substances or harmful physical agents, all members of the crew will be advised of the known toxic substance or harmful physical agent(s) and no work shall be performed in that area, except by properly trained and authorized employees utilizing the proper safety equipment.
- Gasoline shall not be used for cleaning purposes.
- Workers shall not use or operate any roofing equipment, electrical equipment or machinery unless they have been trained in the proper use and operation of such equipment or machinery.
- Materials or other objects must not be thrown from buildings or structures unless proper precautions are taken to protect persons below from falling objects. Areas must be barricaded and a spotter must be present on the ground to prevent other personnel from entering in the barricaded area.
- Always use the proper lifting techniques – using the large muscles of the legs rather than the small muscles of the back.
- Avoid twisting the back when carrying items.
- Avoid lifting or pushing an object that exceeds 50 pounds.
- Employees must use a dolly, cart or other equipment to minimize the possibility of injuries when it is necessary to move an item(s) exceeding 50 pounds.
- Heavy materials and equipment shall be placed in the immediate area of installation or use to minimize the potential for injuries from lifting or moving these items.
- A Job Hazard Analysis (JHA) shall be performed prior to work commencing to identify potential safety hazards (i.e. lifting, weather, tool usage, hazardous chemical use, site conditions etc.) and how to mitigate these hazards prior to work commencing.
- No burning, welding or other source of ignition shall be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from the foreman or superintendent.
- Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or enclosed spaces that receive little ventilation, unless trained in the proper methods of confined space entry.

- Buggies, carts and wheeled equipment should never be closer than 10’ from the roof edge, nor should they be pulled backwards.
- All roofing materials must be secured or tied down to prevent material from sliding or blowing of the roof.

# D. GENERAL SAFETY PRECAUTIONS & OPERATING PROCEDURES

Every task in our daily jobs must reflect an element of safety. There are general, common sense safety practices and procedures that we observe; however, the more hazardous exposure an operation presents, the more detailed and specific the safety procedures become. It is the responsibility of management to make proper safety training, procedures and equipment available. It is the responsibility of every employee to apply the knowledge and training that is provided. Safety equipment will only work if it is used and used properly. Safety training will only prevent accidents and injuries when applied properly to a specific task.

Employees asked to perform a job function, for which the employee has not been properly trained, must refuse to proceed until proper training and any necessary personal protective equipment is provided. Kodiak employee shall not be required or knowingly permitted to work in an unsafe place, unless for the purpose of making it safe and then only after proper precautions have been taken to protect the employee while performing such work. Additionally, Kodiak employees have the responsibility to notify their supervisor immediately if they are fatigued and feel that they cannot perform their job duties safely. Prior to a job being started, the relevant hazards are to be evaluated and necessary equipment and procedures planned before the work proceeds.

### First Aid/CPR

Kodiak personnel are reminded that accidents and injuries can be avoided by following safe practices and recognizing and mitigating unsafe conditions and behaviors. Occasionally accidents and injuries do occur in the workplace. Employees that are trained and certified in proper first aid procedures are expected to render aid when needed. The following aspects address Kodiak's First Aid/CPR procedures:

- Training/Retraining
- First Aid Kits
- Eyewash Stations, Showers
- Responding to injuries

### Training/Retraining

First Aid/CPR certifications must meet the training requirements of OSHA, i.e. American Red Cross, American Heart Association, or equivalent training that can be verified and documented. Kodiak will provide training and certification as well as retraining and re-certification to Kodiak supervisory personnel. Non-supervisory personnel are encouraged to participate in these training/certification classes although authorization from their immediate supervisor is required. These training classes are offered several times yearly to Kodiak personnel. Training and retraining shall be provided, at least yearly, concerning the location of First Aid Kits, eyewash stations, response to injuries as well as procedures to ensure affected persons are transported to the appropriate advanced medical facilities.

### First Aid Kits

First Aid Kits that have been determined to contain the appropriate type and quantities of first aid supplies that are adequate to the work environment, conditions and type of work taking place shall be made available at all Kodiak offices, warehouses and jobsites/projects. First Aid Kits shall be available in key locations that will minimize access delays. Evacuation route maps located at all Kodiak facilities shall

indicate the location of First Aid Kits for each facility. First Aid Kits shall be issued to all jobsite/project foremen. The First Aid Kits shall be maintained in the job box, Kodiak truck, or Kodiak trailer at all jobsites/projects.
First Aid kit contents shall be inspected monthly to insure adequate quantities and sterility of the contents.

### Eyewash Stations, Showers

Eyewash stations, showers and/or supplies shall be provided to drench/flush eyes or body parts whenever Kodiak personnel are engaged in activities where there exists the potential for exposure to corrosive materials. Procedures to mitigate exposures to corrosive materials shall be developed by a competent person prior to allowing any Kodiak personnel to engage in work activities that utilize corrosive materials. The developed procedures shall address location and proper use of the eyewash, shower and/or supplies in cases of exposure.

### Responding to Injuries

Directions to the nearest advanced medical facilities/providers will be posted at Kodiak offices and warehouses. Foreman packs shall contain information and directions to the nearest advanced medical facility/provider. When injuries occur on jobsites/projects located more than 15 minutes or 5 miles from the nearest medical facility/provider, Kodiak personnel who have been trained and hold a valid first aid certification are expected to render assistance to the injured person. Minor injuries may not require assistance from a person possessing a valid certification. Advanced medical personnel (EMT's paramedics etc.) shall be summoned in the event of a serious or life-threatening injury.
Kodiak foremen and/or supervisory personnel present are responsible in ensuring that the injured person is transported to the identified medical facility for advanced medical treatment as needed. Kodiak vehicles shall be utilized for this purpose. For serious or life-threatening injuries, the injured person shall be transported by appropriate emergency responders.

### Housekeeping

During any operation, good housekeeping shall be practiced to prevent accidents and/or injuries. Good housekeeping practices are as follows:

- Keep all boards, materials or tear off debris with protruding nails, screws or other pointed or sharp edges cleared away from work areas, walkways and staging areas. Remove the nails, screws, pointed or sharp edges from boards or other materials to abate the hazard. In some instances where small nails (6d or smaller) or staples are protruding from the materials, the exposed nails or staples etc. can be bent over to abate the potential hazard.
- All materials stored, staged and used on site shall be secured to prevent displacement by winds or other conditions that may cause them to become flying or falling hazards.
- Material storage areas, walkways and paths of access are to be kept free of obstructions and debris to prevent slipping and/or tripping hazards.
- Combustible debris (paper, sawdust, wood and other flammable debris) must be cleaned up promptly and stored away from potential sources of fire such as kettles or other equipment which could produce sparks, flames, or high heat.
- Highly flammable or hazardous wastes must be kept in covered containers and maintained separate from normal debris and materials.

- Waste shall be disposed of at intervals determined by the rate of accumulation and the capacity of job site containers.
- Hazardous waste shall be disposed of in a manner consistent with local laws and regulations.

## E. GENERAL WASTE MANAGEMENT

Kodiak is committed to reducing the impact of our work activities on the environment. This plan has been created to aid Kodiak in achieving these goals. This plan will be adhered to by Kodiak and other jobsite personnel during the construction of this project. Kodiak will implement and discuss goals and issues as part of our job handoff coordination meeting, and document this plan throughout the course of construction activities. Kodiak foremen shall ensure on-site execution of this plan.

Prior to the beginning of a project Kodiak will determine what types of waste, trash and scrap materials will be produced and how they should be separated and disposed of. The following types of waste shall be separated and placed in the properly designated containers for recycling:

- Cardboard
- Clean dimensional wood
- Ferrous and non-ferrous metals
- Recyclable Plastic

All other waste materials, not listed above, will be handled as general refuse and disposed of at a licensed and permitted landfill.

This waste management plan will be shared with the jobsite/project foreman and/or superintendent responsible for this project. Kodiak will discuss goals and handling procedures of the waste generated during coordination meetings. The job handoff coordination meeting will provide an orientation discussion of this Waste Management Plan. Items that will be discussed at this orientation will be as follows:

- Plan requirements
- A review of waste handling procedures
- Location of dumpsters/bins
- Waste segregation requirements
- Discussion regarding cross contamination of waste
- Enforcement requirements
- Open discussion for suggestions/comments regarding effectiveness of plan and feedback

During the jobsite/project orientation meeting and subsequent weekly tailgate safety meetings, the Kodiak foreman will instruct Kodiak personnel as to the proper handling of waste materials to be recycled, salvaged, or disposed of. Waste materials shall be protected from contamination by hazardous materials that may prevent them from being recycled. The recycled materials will be collected by a waste hauler and hauled to the designated recycling center.

## F. MATERIAL HANDLING/ERGONOMICS

Kodiak employees are consistently working, carrying, using, and installing different materials and tools in and throughout their daily responsibilities. Sometimes repetitive work of this type can lead to painful injuries such as Musculoskeletal Disorder (MST) and Cumulative Trauma Disorder (CTD) also known as Soft Tissue Injuries.

## Soft Tissue Injury

Soft tissue injuries are injuries that affect muscles, nerves, tendons, ligaments, joints and spinal discs. Soft tissue injuries can occur when handling materials and tools repetitively while working. Soft tissue injuries account for a large number of disabling injuries each year. Although they are not fatal they can prevent a person from leading a normal lifestyle and sometimes can result in living with constant pain. The following are examples of soft tissue injuries:

- Sprains
- Strains
- Nerve Damage
- Sciatica
- Tendonitis
- Bulging or Ruptured Disc
- Bursitis
- Carpal Tunnel Syndrome

Not all symptoms of soft tissue injuries are listed below but some of the symptoms consist of:

- Range of Motion Loss
- Loss of Muscle Function
- Sore Muscles
- Sprain/Strain
- Bruising
- Pinched nerves

## Causes and Prevention (Controls)

Soft Tissue Injuries can be caused by many different activities. Listed below are examples of different causes and the controls needed to prevent soft tissue injuries.

a. **Repetitive Motions:** Tasks with high repetition rates even when the forces involved are minimal and normally safe can cause these injuries. Examples would include raising and lowering your arms over and over to complete a task. Using a hammer, snips, screw gun, caulk gun etc. Repetitive motion controls to help prevent these injuries can include:
    - Rotating Tasks with other workers
    - Use power tools when possible rather than hand tools.
    - Tools selection (Tools w/o finger grooves, Offset handles, soft grips)

b. **Awkward Postures:** An awkward posture is one in which any part of the body is under strain due to an unnatural or extreme position. Examples include, picking up a load over the side of a pickup truck, working in tight or restricted spaces, working overhead etc. Controls can include:
    - Use scaffold or ladders to elevate you to the work
    - Position work at waist level if possible
    - Using mechanical lifting aids to lift and/or position materials for installation
    - Plan ahead to perform work while the work area is readily accessible
    - Tool extensions to reduce overreaching

c. **Forceful Exertion:** The amount of effort required to perform a task is called force. The more force you use the greater the stress on your body. Examples include, pushing on a screwdriver while twisting it, pressing a trigger to operate a power tool, Lifting excessive weight. Controls include:
    - Use proper lifting techniques
    - Utilize equipment to lift, move, position and/or support heavy loads
    - Ask for help when lifting bulky/awkward loads

- Use power tools instead of hand tools

d. **Contact Stress:** Caused by contact with hard objects or surfaces. Examples include: working on your knees, striking an object with your hand, carrying an object or material and supporting it with your shoulder or head, working off of ladders. Controls can include:
    - Using knee pads
    - Shoe inserts for prolonged standing
    - Wearing gloves
    - Use ergonomically designed tools
e. **Prolonged Vibration:** Exposure to vibrations for extended periods of time include, jack hammers, impact tools, tampers, drilling tools and equipment, operating heavy equipment. Controls include:
    - Use proper gloves
    - Use padded seat cushions
    - Keep hands warm to maximize blood flow while using vibrating tools
    - Do not grip tool too tight
    - Use tools designed to reduce felt vibrations
f. **Excess Body Weight:** Excess body weight can cause stress on joints and muscles. Controls can include:
    - Healthy Diet
    - Daily Exercise
    - Use of a stool or chair when standing in one place
g. **Slips/Trips/Falls:** are commonly the result of poor housekeeping and or lack of attention of where you are walking or working. Examples include wet/icy/slippery surfaces, poor lighting, inattention, ignoring safety requirements. Controls include:
    - Be aware of where you are walking
    - Use Fall Protection
    - Make housekeeping a priority
    - Don't jump from equipment
h. **Struck by injuries:** Struck by injuries occur from flying or falling objects, moving equipment or vehicles. Controls include:
    - Wear the proper PPE as warranted by the work performed
    - Barricade areas with overhead hazards
    - Ensure mobile equipment and vehicles have back up alarms
    - Use toe boards on scaffolds
    - Follow proper rigging techniques
    - Don't walk under suspended loads or lifting equipment
i. **Caught in Injuries:** These injuries are caused when all or part of a person's body is caught between two objects. Examples are getting a hand caught in moving machinery, trapped between vehicles, getting trapped between moving equipment and a fixed object. Controls consist of:
    - Ensuring machinery guards are in place
    - Lock out energy sources when working on machinery or equipment
    - Staying clear of the swing radius of back hoes and cranes
    - Keep clear of machinery pinch points

### Stretch & Flex

Studies have shown the benefits of taking 8 – 10 minutes to flex and stretch muscles, and joints Stretching is extremely important to maintain muscle pliability and length. This avoids injury to muscles and improves the ability to perform tasks utilizing these muscles. One of the most commonly injured areas on the jobsite is the lower back. Tightness in the back, hamstrings and calves can increase the risk of injury to the back and spine. Proper stretching can lengthen these muscles and increase pliability allowing the body to maintain proper position when lifting. In all stretch and flex programs are targeted at increasing flexibility and reducing the possibility of injury when performing lifting tasks.

All Kodiak employees working on construction sites must participate in an 8 – 10 minute daily stretch and flex session prior to beginning work activities. The on-site foreman/supervisor shall lead these sessions.

### Conclusion

Remember that MST/CDT or soft tissue injuries can be prevented by limiting the amount of force applied to perform a task, reduce vibrations, avoid or limit contact with hard surfaces, work with your body positioned in its natural posture, reduce repetitive motions. Other controls that can help would be stretching often, keeping in good physical shape, eating healthy and taking time to rest after a tough day at work. By following these suggestions and working smart you can greatly reduce the chances of experiencing Soft Tissue Injuries.

## G. LIFTING AND BACK SAFETY

Back strains, sprains and ruptured disks account for a large portion of work-related injuries on construction sites. Lifting/Back injuries occur when lifting or moving an item(s). Examples are improper lifting techniques, lifting too much weight, lifting bulky or awkward loads, pushing or pulling or re-positioning large or heavy items.

To prevent potential lifting and back injuries, manual lifting should be controlled or eliminated. The following controls shall be utilized by Kodiak personnel assigned to work on Kodiak projects:

- Kodiak personnel shall utilize dollies, carts or other mechanical equipment to lift, carry and position materials/items whenever possible.
- If materials/items must be manually lifted, carried or positioned, the material/item shall not exceed 50 pounds
- Break down packaging of multiple units into single units prior to movement
- Manually lifted materials/items shall not be lifted above waist level
- Pre-task planning prior to the project mobilization shall determine:
    - Materials, equipment, machinery etc. that are needed for the project.
    - How materials/items will be laid out to minimize movement.
    - Types of equipment (dollies, carts, lifting devices etc.) are needed to move materials.
    - Obstructions that are present that may limit the use of dollies, carts etc.
    - The methods utilized to move these items while installation is underway.
- A Job Safety Analysis (JHA) shall be completed by the assigned foreman prior to work commencing on a project. This JHA shall be reviewed with each employee assigned to the project. After review, each employee shall sign the JHA thereby showing that he/she is aware of and how to mitigate the hazards identified in the JHA
- Engineering Controls

- Work with supplier/manufacturer to determine if materials can be packaged into smaller/lighter units.
- Provide a copy of the roof layout to the supplier/distributor with areas identified as to where to lay out delivered materials at the project to minimize movement.

- If it is necessary to manually lift, carry or position material/items, the following questions shall be asked prior to lifting, carrying or positioning an item:
  - Does it weigh more than 50 pounds?
  - Can I safely lift it alone?
  - Is it too awkward/bulky for one person to lift alone?
  - Should I ask for help?

**Proper Lifting Techniques**

If it is determined that the load is manageable and can be safely lifted, the following lifting methods shall be utilized to minimize the potential for injuries:

- "Survey the Area" (ensuring the path of travel is free of obstructions, debris, tripping hazards is an important part of lifting safety)
- "Bend at the Knees not the Waist" (this allows the strong muscles of your legs to do the lifting)
- "Hug the Load" (try keep the load as close to the body as possible)
- "Gradually Straighten the Legs to a Standing Position" (by using gradual movements, the risk of muscle strains can be minimized)
- "Avoid Twisting" (the torso, feet and knees should be pointing in the same direction when lifting. Keeping the back straight and aligned minimizes the chances of overloading the spine which leads to injuries.)

# H. TOOLS AND EQUIPMENT

All tools and equipment used by employees (Kodiak or employee owned) on the job shall be maintained in good and safe condition. Damaged or worn tools and equipment must be turned in to the job-site foreman or superintendent for replacement. The job-site foreman and/or superintendent is responsible for promptly removing such tools and equipment from service and reporting the need for repairs or replacement to the Safety Director and/or the Project Manager, who will tag such tools and equipment as "DEFECTIVE" and arrange for the required repairs or replacement.

- Only appropriate tools shall be used for the job.
- Tools shall be used only in a manner consistent with their design and function.
- A screwdriver shall not be used as a chisel or pry-bar.
- Files shall be equipped with handles and not used to punch or pry.
- Portable electric tools shall not be lifted or lowered by their power cords.
- Electric extension cords shall not be exposed to damage from vehicular traffic.
- All electric power equipment cords and extension cords must be inspected for missing grounding prongs, torn insulation, cut or exposed wires, etc.
- Power tools, extension cords etc. are to be removed from service if any of the above conditions exist.

- Electrical power and extension cords are prohibited from use in areas where standing water exists.
- All electric power tools, equipment must be used in conjunction with Ground Fault Interrupter (GFI) circuits to protect operators from electrocution should a fault occur while operating power tools, equipment.
- In areas where the use of a portable power tool is difficult, the tool shall be supported by means of a rope or similar support of adequate strength.
- Cutting tools must be kept sharp, used with proper force at the appropriate angle with adequate clearance from people and obstructions.
- Employees shall not use cutting tools, saws, nail guns, seam welders, roto-hammers, or other equipment until they have received proper safety training.
- Proper protective equipment (safety glasses, face shields, gloves etc.) should be worn when using roof saws, drills or other equipment.
- Employees shall be instructed to ensure that all guards and other protective devices are in place, adjusted properly, and shall report deficiencies promptly to the foreman or superintendent.
- Wrenches shall not be altered by the addition of handle extensions or "cheaters."
- When cutting with knives or hand tools, always cut away from the body.
- Utility knives equipped with hook blades are prohibited when performing detail work. Only straight blade utility knives or scissors are to be utilized while performing detail work.
- Utility Knives with hook blades are allowed only when cutting long strips of single ply membrane, ice & water shield or roofing felt.
- Torches are to be inspected and used only when an appropriate fire extinguisher (10lb ABC) is available within 50 ft. of work being performed.
- Nail guns must be activated only when in contact with the work surface and shall be removed from service and tagged "defective" if this feature is missing or broken.
- Should employees use their own personal tools at a jobs site, those tools are subject to inspection and the same operating standards apply. Tools must be repaired or replaced in found to be defective.
- Hand tools and power tools shall be inspected daily and before each use for damage, defects, missing safety features or guards and shall be tagged defective and taken out of service immediately if deficiencies are found during the inspection process.

# I. MACHINERY AND EQUIPMENT

Only authorized persons shall operate machinery or equipment. The following equipment requires official certification by Kodiak in order to adequately demonstrate the employee's knowledge of the hazards, responsibilities, and practical procedures of operation, associated with the function of such equipment:

- Fork-lifts (all classifications)
- Company trucks
- Hot asphalt kettles
- Cranes, (all classifications)
- Aerial/Boom lifts
- Scissor Lifts
- Powder Actuated Tools

When operating machinery or equipment, employees shall observe the following rules:

- Loose or frayed clothing, or long hair, dangling ties, finger rings, etc. shall not be worn around moving machinery or other sources of entanglement.
- Machinery shall not be serviced, repaired, or adjusted while in operation, nor shall oiling of moving parts be attempted, except on equipment that is designed or fitted with safeguards to protect the person performing the work.
- Air hoses shall not be disconnected at compressors until hose line has been bled.
- Drivers who regularly operate Company vehicles shall inspect the vehicle weekly and fill out a "Driver's Vehicle Inspection Report" and turn in report to vehicle Maintenance Supervisor. Vehicles with safety defects shall not be driven.
- Employees shall drive defensively, wear seat and shoulder belts and not exceed the speed that is safe for the conditions. Employees shall not exceed the speed limit.
- Crowding or pushing when boarding or leaving any vehicle or other conveyances shall be prohibited.
- Employees shall park vehicles in legal parking spaces that do not obstruct traffic.
- A portable extinguisher appropriate for extinguishing motor vehicle fires will be mounted and maintained in a readily accessible location in every Company vehicle and persons who drive such vehicles are required to know its location and be trained in its use. All such fire extinguishers will be inspected and recharged annually and the date of last recharge shall be noted on an inspection tag affixed on the fire extinguisher.
- An appropriate first-aid kit, including rubber gloves, shall be maintained and secured in every Company vehicle.
- Observe traffic control guidelines as issued by Caltrans when operating in traffic.
- Employees may use survey vehicles to block traffic when directed to do so by proper authority.
- Employees shall not work under vehicles supported by jacks or chain hoists, without protective blocking that will prevent injury if jack or hoists should fail.
- When loading in an area where there is a possibility of dangerous slides or movement of material, the wheels or treads of loading equipment should be turned in the direction which will facilitate escape in case of danger, except in a situation where the position of the wheels or treads would cause a greater occupational hazard.
- Forklifts, trucks, tractors, and carryalls shall not be operated where there is possibility of overturning in dangerous areas such as excavations, edges of deep fills, cut banks, and steep slopes.

# J. MOTOR VEHICLE SAFETY

### Maintenance and Operation

Most vehicles are driven daily. It is necessary to perform a pre-trip inspection to ensure the ongoing reliability and safety of vehicles. Management will provide the necessary resources to maintain vehicles in good, safe running condition. It is the responsibility of the individual driver to report a mechanical problem, which need to be addressed. General maintenance shall be provided on a regular schedule to maintain the vehicle in safe working order. In addition:

- Always check the oil and coolant levels before starting a vehicle.

- For large vehicles, especially those requiring a Class B license, it is necessary to fill out a pre-trip inspection and to ensure that all required equipment is available.
- A Drivers Vehicle Inspection Report (DVIR) shall be filled out weekly and a copy given to the fleet manager.
- Always use a spotter when backing up a vehicle with limited visibility.
- Dump trucks/Trailers are to be covered when transporting a load.
- All equipment and materials being transported in a truck or trailer are to be properly tied down or covered to prevent material from blowing out of the vehicle.
- Trailers must be inspected prior to towing.
- Trailer lights must be functional
- Trailer Safety chains and the breakaway cable must be securely attached to the towing vehicle before towing.
- Materials and equipment on trailers must be securely tied to prevent movement.
- Loads on trailers shall be checked frequently during any extended trips (>20 miles).
- Any incident on the road is to be reported (flying debris, rocks, and altercations with another driver, etc.) to a supervisor and the Kodiak Safety Director.
- Any accident or citation involving a company vehicle is to be reported immediately. You may cooperate with law enforcement officers, but request other parties involved to contact the Kodiak fleet manager.
- Do not admit liability in an accident. The official report will establish liability.
- Lift bed or scissors dumps are to be operated on level ground. Outriggers are for minor leveling and stability.
- Never move a truck with the bed lifted. Load and unload the truck evenly. Do not load vehicles beyond manufacturer's recommendations.
- Only use vehicles for their intended use and of the correct size and design.
- Employees may refuse to drive a vehicle that has mechanical defects that would affect safety. Examples would be fluid leaks, broken lights, inoperable turn signals or worn-out tires.

## Drivers

One area of responsibility in the day-to-day operations which presents a potential for accident or injury is the operation of motor vehicles. It is imperative that employees entrusted with this responsibility demonstrate personal integrity, provide a documented performance record and that they be trained properly to operate vehicle assigned to their use. Only authorized persons shall be permitted to operate a motor vehicle. The following shall apply to drivers of Kodiak vehicles:

- Employees 20 years or older with a valid driver's license and insurable record may be permitted to operate company vehicles or be allowed to drive in the course of their employment.
- Employees under 21 shall not be assigned to drive as their primary job assignment.
- All federal, state and local traffic laws must be obeyed.
- Employees are forbidden to use a cell phone for talking, texting or instant messaging while operating a Kodiak vehicle.
- Distracted Driving (phone use, eating, drinking, applying make-up, shaving etc.) is prohibited while operating a motor vehicle.

- Employees authorized to operate a motor vehicle are prohibited from doing so while under the influence of alcohol, illegal drugs as well as certain prescribed medications.
- Smoking in Kodiak vehicles is prohibited.
- Any accident or citation must be reported immediately to the Kodiak Safety Director and immediate supervisor.
- All employees given the responsibility and privilege of driving a Kodiak owned motor vehicle must have their driver's license submitted to the DMV Pull Notice Program for monitoring. This program notifies the Company immediately if there is a change in the status or activity on the driving record of the employee.
- Drivers of vehicles with a GVW (Gross Vehicle Weight) over 10,000 lbs. and who are driving interstate must possess a current DOT medical card and must maintain a DOT approved driver's log while operating vehicles interstate.
- A driver must have the proper license for the vehicle(s) he/she is driving. Any vehicles with a GVW (gross vehicle weight) over 26,000 lbs., requires a Class B driver's license.
- All Class B drivers must possess a current DOT medical card.
- Drivers of Class B, commercial vehicles (over 10,000 lbs. GVW) are subject to random drug tests per DOT regulations.
- Any employee found using a company vehicle in an unsafe or reckless manner or without the proper paperwork on file at the office, will be subject to disciplinary action up to and including discharge.
- All occupants in company and personal vehicles used for company business are required to wear a safety belt while the vehicle is in motion

## K. AERIAL/SCISSOR LIFTS

For purposes of this section, "Aerial Lifts" shall consist of the following: Extensible boom platforms, articulating boom platforms, aerial ladders and vertical towers.
All employees engaged in work using Aerial Lifts will follow the standards as specified in CFR 29 1926.453 of the Federal OSHA Standards.

### Training

The employer shall have each employee who performs work while on an aerial/scissor lift trained to recognize the hazards associated with the type of lifts being used and to understand the procedures to control or minimize those hazards. The training shall include the following areas, as applicable:

- The nature of any electrical hazards
- Procedures for dealing with electrical hazards
- Caught between/struck by hazards
- Fall protection requirements while operating the lift
- The proper operation and use of the lifts
- Proper handling of materials on the lifts
- The maximum intended load and the load-carrying capacities of the lift used
- Safety requirements while using a lift
- Pre-operation inspections

## Inspections

Inspections are important in helping to prevent accidents caused by equipment failure, wear or inoperable controls. When the aerial/scissor lift first arrives on site, the senior qualified Kodiak representative (foreman or superintendent) will inspect and evaluate the condition of the lift. The inspection will include the following items.

- Is a copy of the appropriate operators' manual included with the lift?
- Is the lift in good mechanical condition?
- Does the lift respond to all controls as described by the control panel?
- Are controls market legibly?
- Is the tilt alarm and Load Management System in working order? (perform diagnostics with rental company representative if possible)

Once it has been determined that the aerial/scissor lift is in satisfactory condition it may be accepted onto the jobsite. Additional inspection requirements in addition to the above referenced inspection items are outlined as follows:

- All lifts shall be inspected and the inspection documented by the operator daily at the beginning of each shift.
- A site inspection detailing hazardous areas (i.e. holes, drop-offs, overhead obstructions etc.) shall be performed daily in addition to the lift inspection.
- Lifts that do not pass the daily lift inspections due to defects, damage or wear must be red tagged and not used until noted deficiencies are corrected.
- Daily inspections of the lift must be documented on form (IIPP-13.2, 13.3).
- The inspection forms shall be turned in with the foreman's daily reports to the superintendent weekly.
- Copies of the reports shall be kept in the job binder maintained at Kodiak's offices.

## Additional Safe Practices

- Only certified Kodiak employees may operate an aerial lift.
- The aerial lift shall not be operated on surfaces that are unstable or present hazards that can cause unstable operations of the lift.
- If no firm level surface is present, the aerial lift must not be used in that area. Other alternatives, such as scaffolding, or waiting for grading work to be completed, must be exercised.
- The operator shall maintain a distance of at least 10 (ten) feet away from any type of electrical/power lines.
- Aerial lifts shall not be modified without written approval of the lift manufacturer.
- The operator must also be aware if the lift is equipped with a tilt alarm and/or a load management system (LMS). The operator must not depend solely on these devices to determine the level of the lifts base.
- The operator is responsible for the safety of all personal working in and around the lift.
- The lower controls shall not be operated while personnel are in the lift basket unless an emergency requires it, and only if the personnel in the basket are unable to operate the controls on their own.

- Scissor lifts equipped with guard rails and toe boards do not require employees to tie off unless required by the manufacturer or owner of the equipment.
- All personnel working in the basket of an aerial lift must be equipped with an OSHA approved full body harness and lanyard.
- Each employee must tie off in accordance to regulations found in CFR 29-1926.453.
- Tying off to an adjacent pole, structure, or equipment while working from an aerial lift is not be permitted.
- Delineators and caution tape must be placed around the working area of the lift when personnel or the general public are able to access the area directly below the lift.
- All access and egress to the building below the working area must be barricaded to prevent persons from passing or working below a raised lift.
- Personnel in the lift basket shall remain standing on the basket floor and not use the toe boards, rails or other means to gain additional height.
- The operator is never to extend the boom of an aerial lift while moving the aerial lift.
- The operator must never move the aerial lift while the boom is extended unless designed for that purpose.
- The operator shall not exceed the load limits of the equipment he is operating.
- Many units have level warning mechanisms. DO NOT over ride these warning systems. Consult the operator manual for reach and extension limits of the unit.
- NEVER BYPASS OR DISCONNECT ANY MACHINERY OR EQUIPMENT SAFETY FEATURES.
- Be aware of windy condition. Do not use any type of aerial lift in high winds. Anything that is lifted that could act as a sail could cause the unit to tip even in moderate wind.
- Foremen and superintendents will inspect and predetermine areas where aerial/scissor lifts will be used on each job site. Site conditions including ground slope and grade will be evaluated at that time.

# L. FORKLIFTS

Forklifts, aka, Powered Industrial Trucks (PIT) their use and operator training requirements are found in the OSHA standards in 29CFR1910.178 (General Industry), 29CFR1926.602 (Construction) and Cal-OSHA T8§3650, 3664, 3668 & 3669.

### Training

All Kodiak employees are required to be trained and certified prior to operating forklifts in the workplace. This training consists of a formal classroom training session that covers the OSHA requirements as outlined below:

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate;
- Differences between the truck and the automobile
- Truck controls and instrumentation: where they are located, what they do, and how they work
- Engine or motor operation;
- Steering and maneuvering;
- Visibility (including restrictions due to loading);
- Fork and attachment adaptation, operation, and use limitations;

- Vehicle capacity;
- Vehicle stability;
- Any vehicle inspection and maintenance that the operator will be required to perform;
    a. Refueling and/or charging and recharging of batteries;
    b. Operating limitations;
    c. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

Workplace-related topics shall consist of the following:

- Surface conditions where the vehicle will be operated;
- Composition of loads to be carried and load stability;
- Load manipulation, stacking, and un-stacking;
- Pedestrian traffic in areas where the vehicle will be operated;
- Narrow aisles and other restricted places where the vehicle will be operated;
- Hazardous (classified) locations where the vehicle will be operated;
- Ramps and other sloped surfaces that could affect the vehicle's stability;
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust;
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

Additionally, Kodiak employees will be tested on their knowledge of the topics covered.
Kodiak employees shall be required to demonstrate their ability to operate a forklift safely in practical hands-on demonstrations utilizing the type of forklift they will be certified to operate.

### Refresher Training/Evaluation

Refresher training, including an evaluation of the effectiveness of that training, shall be conducted to ensure that the operator has the knowledge and skills needed to operate the forklift safely.

- Refresher training in relevant topics shall be provided to the operator when:
- The operator has been observed to operate the vehicle in an unsafe manner;
- The operator has been involved in an accident or near-miss incident;
- The operator has received an evaluation that reveals that the operator is not operating the truck safely;
- The operator is assigned to drive a different type of truck; or
- A condition in the workplace changes in a manner that could affect safe operation of the truck.
- An evaluation of each powered industrial truck operator's performance shall be conducted at least once every three years.
- Documentation of the classroom training, hands-on evaluations and testing will be maintained with the Kodiak Safety Director.

### Classes of Forklifts

Kodiak requires that an employee be trained and certified in the class type of forklift that they will be operating. Additionally, Kodiak employees are required to review the operator’s manual to familiarize themselves with the model of forklift they will be operating before operating the forklift. Forklifts used by Kodiak employees are listed under the following classes:

- **Class 1, 4 and 5** – Counter-balanced sit down gas, propane, electric powered with solid or pneumatic tires (Kodiak's warehouses)
- **Class 7** – Rough Terrain Vertical Mast and Extended Reach Forklifts (Construction sites)

## Inspections

When the lift arrives on site, the senior qualified Kodiak representative (foreman or superintendent) will evaluate the condition of the lift. The inspection will include the following items.

- Is a copy of the appropriate operators' manual included with the forklift?
- Is the forklift in good mechanical condition?
- Does the forklift respond to all controls as described by the control panel?
- Are controls market legibly?
- Is the tilt alarm and Load Management System in working order? (perform diagnostics with rental company representative if possible)

Once this initial inspection has been performed the forklift can be accepted onto the jobsite. If the forklift does not pass this inspection it cannot be allowed onto the job site. The following are outlines additional steps to be followed when inspecting and operating forklifts on Kodiak job sites or warehouses:

1) All forklifts are required to be inspected by the operator daily at the beginning of each shift.
2) Forklifts that do not pass the daily inspections due to defects, damage or wear must be red tagged and not used until noted deficiencies are corrected.
3) Daily inspections of the forklift must be documented on form (IIPP-13, 13.1).
4) The inspection forms shall be turned in with the foreman's daily reports to the superintendent weekly.
5) Copies of the reports shall be kept in the job binder maintained at Kodiak's offices.

## Additional Safe Practices

The following outlines additional safe work practices when operating forklifts:

- Only certified Kodiak employees may operate a forklift.
- Forklift operators are required to use seatbelts while operating the forklift.
- The operator is to review the limits of the forklift before extending the boom.
- Outriggers must be used (if equipped) when lifting and extending the boom to raise or lower a load.
- The operator is responsible for the safety of all personnel walking or working near the forklift.
- The operator must not allow anyone to walk under a lifted load.
- Operators must remain in the forklift when the boom is extended and raised.
- All access and egress points to the building below the immediate working area of the forklift must be barricaded to prevent people from passing under a lifted load. This must be coordinated with the general contractor. The general contractor must share the responsibility of enforcing all barriers.
- The operator is never to extend the boom while driving the forklift.
- The operator must never move the forklift while the boom is extended unless designed for that purpose.
- The operator is responsible to know the limits of the equipment he is operating.

- Many units have level warning mechanisms. DO NOT over ride these warning systems. Consult the operator manual for reach and extension limits of the unit.
- NEVER BYPASS OR DISCONNECT ANY FORKLIFT SAFETY FEATURES.
- Be aware of windy condition. Do not operate forklifts in high winds. Anything that is lifted that could act as a sail could cause the unit to tip even in moderate wind.

# M. CRANES

When a crane is used to facilitate loading, or unloading a roof, there are safety requirements, which must be met by the subcontractor and by company personnel onsite.

**Subcontractor Responsibilities:**

- The operator must be certified and have proof of current certification at the job site. Certified Crane Operators card (CCOC)
- Card issued by the crane company or a letter from the company stating qualifications
- Crane certification must be provided and available on site
- Annual Crane Certification
- Quadrennial inspection and certification
- Signal Persons must be trained and certified prior to signaling crane operators
- Riggers must be trained and qualified to perform the duties of a rigger.
- **Acquire any permits based on jurisdictional requirements for critical or engineered lifts**

Superintendents and/or Project managers are responsible for coordinating and scheduling with the building owner, general contractor and/or other trades for crane appointments. In addition, Superintendents and/or project managers are:

- Responsible to provide necessary certification as required.
- Responsible to ensure that we are operating within the safety requirements of the owner or general contractor. Some companies require a building to be evacuated during a crane load, etc.

Employees on site are to follow applicable safety rules for overhead work such as:

- Wearing hard hats.
- Not standing under lifted loads or in the fall zone of lifted loads
- Using tag lines on loads that need controlling
- Using a dedicated spotter to prevent encroachment into power lines
- Signal Persons are required to be trained and certified in the standard hand signals for controlling crane operations.
- Work areas are to be barricaded if possible or protected by safety spotters to prevent vehicular and pedestrian traffic from entering the loading area.
- Cranes must not be able to encroach within 20’ of any electrical power lines.
- If it is necessary to get closer than 20’ of power lines a dedicated spotter must be used to signal the crane operator to prevent contact with the power lines.
- The dedicated spotter must be able to effectively gauge the clearance distance
- The dedicated spotter must be a certified Signal Person.

**Requirement for the position in charge of Assembly/Dis-assembly when performing covered tasks**

- Kodiak Roofing and Waterproofing does not own cranes and is not involved in the Assembly/Disassembly tasks

## N. LADDERS

- Unless permanent or temporary stairways or suitable ramps or runways are provided, ladders shall be used to give safe access to all elevations.
- Employees shall not carry tools, equipment, roofing materials etc. up or down the ladder.
- Both hands must be free to ascend or descend a ladder
- Ladders shall be inspected daily before use.
- Ladders with broken or missing rungs, split side rails, damaged feet or other defects shall immediately be removed from service.
- Ladder rung spacing shall be uniform and shall comply with OSHA/ANSI specifications.
- Portable ladder feet shall be placed on a substantial base and the area around the top and bottom of the ladder shall be kept clear.
- Extension ladders shall be used at such a pitch or angle that the horizontal distance from the feet to the supporting structure are about one quarter of the working length of the ladder (4:1 ratio)
- Ladders shall not be placed in passageways, doorways, driveways, or any location where they may be displaced by activities being conducted on any other work, unless protected by barricades or guards.
- The side rails shall extend at least 36” above the landing surface. When this is not practical, grab rails, which provide a secure grip for an employee moving to or from the point of access, shall be installed.
- Portable ladders in use shall be tied, blocked or otherwise secured to prevent their being displaced.
- No one shall be permitted to stand and work on the top three (3) rungs or cleats of a ladder unless there are members of the ladder structure that provide a firm handhold.
- Portable metal ladders shall not be used for electrical work or where they may contact electrical conductors.
- Choose ladders that are appropriate for the work taking place.
- Only ladders that exceed the maximum intended load to be placed on them shall be used.
- The first person up a ladder used for access is to secure it at the point where it rests on the structure. A second person shall be used as a spotter and/or to stabilize the ladder until it is tied off.
- Kodiak ladders shall not to be utilized by personnel other than company employees.
- Extension ladders shall not exceed 44 feet in length when extended to the limit permitted. Ladders shall not be fully extended but shall have the following minimum laps: two-section ladders, 3 feet for ladders with working length up to 33 feet, 4 feet for ladders with working length 33 to 44 feet.

- Stepladders are not to be used for roof access unless they are tall enough for three rungs or 36" to extend above the eave level. The ladder must be tied off or secured to prevent displacement while being used.
- Step ladders must be opened and all four feet on a firm level surface before use.
- Employees are prohibited from working on a step ladder that is leaning against a wall or other structure.
- No one may stand on the top two rungs of a step ladder according to the manufacturer's recommendations.
- Barricades, delineators, fencing etc. shall be used to prevent unauthorized personnel from using ladders to access the roof or other work areas.

# O. SCAFFOLDS

The use of scaffolds on a construction/roofing project may present special hazards. In addition, there are specific OSHA regulations and requirements which must be met. It is important that anyone using scaffold equipment has been properly trained.

**Qualified Person** – a person designated by the employer who because of training, experience or instruction has demonstrated the ability to safety perform all assigned duties and, when required, is properly licensed in accordance with federal, state, or local laws and regulations. Persons possessing a certification of competence in scaffold erection, dismantling and use issued by trade associations, state-approved apprenticeship or training programs or other similar training programs shall be considered a "qualified person(s)."

### Scaffold Erection and Dismantling

Only qualified persons may safely erect or dismantle scaffolds. Without proper training and certification per OSHA standards, no employee is to engage in erecting or dismantling scaffolding.

### Training

Employees using a scaffold on a job must receive training in the following areas:

- Nature of electrical hazards present
- Fall protection and falling hazards training.
- Correct procedures for the inspection of scaffolds.
- Proper uses of the scaffold
- Proper scaffold access
- Load capacities of the scaffold
- OSHA requirements

### Retraining

Kodiak personnel will be retrained on scaffold hazards and use whenever the following occurs:

- Refresher training through tailgate safety meetings
- It is determined that the affected employee does not have the knowledge, understanding or skill necessary to work safely from scaffolds
- Post-accident or near miss

- When new types of scaffolding are introduced into the workplace
- When changes to the work place render previous training obsolete

## Scaffold Use

The following additional scaffold setup and use procedures shall apply:

- Scaffolds shall be designed, erected per OSHA 29CFR 1926.450-454.
- Scaffolds shall be inspected daily by a competent person. Inspection documentation shall be retained onsite in the Foreman's packet and copies shall be submitted to the Kodiak Safety Director.
- Scaffolds which pass daily inspections shall be tagged with a green "Safe for Use" tag indicating that the scaffold is safe to use.
- Scaffolds which have been found to have defects or are determined to be unsafe shall be tagged with a red "Unsafe for Use" tag indicating that the scaffold is unsafe.
- Kodiak personnel are **prohibited** from working on uninspected or red tagged scaffolds.
- Scaffold components from different manufacturers shall not be inter-mixed.
- All scaffolds must be fully planked.
- All scaffold over 6' high shall have handrails and mid-rails on all open ends and sides or a Personal Fall Arrest System (PFAS) must be employed by each person using the scaffold.
- Base plates and mudsills shall be used on all supported scaffolds.
- Cross bracing is not allowed to be used as guardrails.
- Cross bracing shall not be used as a means of access or egress.
    a. Planks shall be free from cracks, damage or warping.
- Planking shall overlap at least 12" and shall extend 6" beyond the center support.
- Planking shall not be painted.
- Adequate access or egress shall be provided with properly secured ladders.
- Rolling scaffolds shall be used on level and smooth surfaces or the wheels must be contained in channels and blocked to prevent movement.
- All rolling scaffold must have adequate cross bracing and be fully planked with guardrails, mid-rails and toe boards when scaffold is 6' in height or higher and shall not exceed a 3 to 1 height to base ratio to the top platform height.
- No more than 12" of the screw jack shall extend between the bottom of the adjusting nut and the top of the caster on rolling scaffolds.
- Rolling scaffold casters and wheels shall be locked during scaffold use.
- Scaffold shall be secured to the structure when the scaffold height exceeds 3 times the least base dimension.
- Do not overload scaffolds.
- Do not use ladders or other makeshift devices to increase the working height of a scaffold.
- At no time shall scaffold components be removed unless in the process of dismantling the scaffold.
- Do not throw objects, materials or tools from a scaffold.

**Inspection**

Scaffolds and scaffold components shall be inspected for visible defects by a competent person before each work shift, and after any occurrence which could affect a scaffold's structural integrity. An erection inspection checklist must be completed before the use of the scaffold or scaffold components.

# P. ELECTRICAL

Electrical safety plays a part in many of our operations and it relates to a potential hazard exposure on the job. General safety guidelines are as follows:

- All electrical equipment is to be inspected before each use to determine that cords and plugs are in good condition.
- Equipment having damaged or defective cords, plugs or cord strain reliefs must be removed from service and repaired or replaced.
- All electric extension cords are to be inspected before use. They must not be used if they are damaged or defective.
- All electrical equipment and electrical cords must be used in conjunction with a ground fault interrupter (GFI).
- Any equipment that may produce an electrical shock must be properly grounded. Examples would include pumps for spray operations, saws, drills etc.
- Be aware of electrical hazards on a jobsite.
- Do not set ladders up near electrical lines.
- Do not use scaffolds that will allow contact with overhead power lines.
- Be careful when working around electrical conduits that run along the roof line.
- Do not attempt to make any repairs on energized equipment, call for an electrician.
- Be aware of electrical hazards when performing repairs during wet weather.
- Extension cords shall not be used if there is standing water where the cord must lay.

# Q. FIRE PREVENTION

Other than emergency plans, which are located at each job site specifically, there are general guidelines for fire safety. Many roofing operations have the potential to cause or expose employees and other personnel to fire hazards.

- A fire extinguisher rated not less than 10 lbs., shall be provided within 50 feet of any operation where more than five (5) gallons of flammable or combustible liquids of five (5) pounds of flammable gas are being used on a job site. This does not apply to the fuel tanks on vehicles.
- Hot operations require at least three (3) fire extinguishers. One at the kettle (size 20: BC) and another near the propane tanks, (size10: BC or larger) and one (10: BC) on the roof within 50' of roofing activities. The above size and ratings are at a minimum.
- Kettle shall be located away from walls or potentially flammable materials.
- Kettles shall be attended while in use to prevent overheating.
- Any heat, spark or flame producing activity (Single Ply heat welding, hot asphalt installation, metal panel cutting which causes sparks etc.) requires a fire extinguisher of at least 2: A 10: BC be located within 25' of said operation.
- A fire watch with a 20lbs ABC fire extinguisher is required when welding or cutting.

- Portable fire extinguishers shall be inspected monthly or more often if indicated. They shall be serviced at least annually by a person licensed or registered by the State Fire Marshal as required by the Health and Safety Code.
- Only metal gas cans equipped with spark arrestors can be used on a jobsite.
- When fueling equipment, the equipment must be turned off and allowed to cool before refueling.
- Propane tanks shall be stored in a well-ventilated area away from potential sources of ignition.
- Observe all "No Smoking" signs.
- There is to be no smoking permitted on the roof or within 50 feet of flammable liquids or gases.
- A crew shall have the ability to call in a fire alarm via mobile phone, two-way radio or on site office phone.
- Personnel must receive specific training on the use of fire extinguishers at least annually.
- Be aware of potential fire hazards while working.

## R. WELDING AND TORCH CUTTING

- Employees must be trained before operating any welding equipment.
- When torch cutting wear proper personal protective equipment such as leather gloves, a leather apron and a face shield with properly tinted lenses.
- Inspect all equipment prior to use, including any compressed gas cylinders, hoses, regulators and torches. Any defective parts should immediately be taken out of service.
- Check the valves for dirt or debris.
- An ABC rated fire extinguisher must be located within easy access during any welding or cutting operations.
- Make sure there are no flammable materials or oily rags located near the welding or cutting operation. Remember to check for and be aware of flammable vapors that may be present.
- When you have completed your welding job, always turn off the acetylene and oxygen at the tanks.
- Conduct welding and soldering operations in well ventilated areas. Respiratory protection may be required. Check with your supervisor.
- Never cut or weld on a tank, drum, or other container, unless it has been thoroughly cleaned and inspected by a supervisor.
- Arc welding requires the use of appropriately tinted eye protection to protect against the bright light generated.
- Welding, grinding or oxy/acetylene cutting of metals such as Stainless or chromium plated steel which produces **Cadmium or Hexavalent Chromium** is prohibited.

## S. FLAGGERS

Flaggers must be used at locations on a construction site when barricades and warning signs cannot effectively control moving traffic. Kodiak must ensure the following:

- Flaggers must be placed in locations to give effective warning.
- Warning signs must be placed according to the Manual on Uniform Traffic Control Devices for Streets and Highways MUTCD.

- Flaggers must wear orange or strong yellow-green warning garments, such as vest jackets, shirts, or rainwear.
- Flaggers' stations must be illuminated, and flaggers must wear retro-reflector garments that are visible at a minimum of 1,000 ft. during hours of darkness.
- Flaggers must be trained in the recognition and prevention of hazards associated with flagging. (See Flagging Instruction Handbook.)
- Training must be documented in accordance with Kodiak IIPP Program requirements.

## T. INCLEMENT WEATHER

The term "normal conditions" is interpreted to mean that weather conditions are dry and calm, and that the roof or substrate is dry and clean of substances that may make the roof slippery. At certain times of year, large temperature changes will create morning dew or even frost. When this moisture/ice is present on the roof, the substrate can become dangerous to work on without additional protection. When this situation exists, the workers will tie off until conditions revert to normal. If conditions do not change 100% tie-off will be the norm.

High winds pose a hazard to individuals working on the roof as well as those on the ground. Roofing materials shall be secured to prevent materials from blowing off the roof and becoming flying hazards. The foreman will determine whether it is safe to work during periods of high winds.

During HOT weather months

- The Kodiak Heat Illness Prevention Plan will be implemented
- The work crew will start as early as possible and end their shift before the heat sets in.
- Drinking water will be provided for all employees daily.
- The drinking water will be supplied and monitored by the job foreman daily.
- Workers should drink plenty of water prior to coming to work to keep themselves hydrated prior to working.
- It is recommended that employees drink 1 quart of water per hour or more as needed.

## U. SUBSTANCE ABUSE

The following is a summary of the Kodiak substance abuse policy. The complete policy is available in the employee handbook. Kodiak recognizes the continuing and growing problems of drug and alcohol use/abuse in our society; therefore, Kodiak follows a **"zero tolerance"** policy with respect to alcohol, drugs and/or substance abuse. As a condition of employment and to ensure individuals are fit for duty, it is the policy of Kodiak to assure that drug or alcohol use/abuse by employees or others does not jeopardize the health and safety of Kodiak employees, customers, public, operations, or otherwise adversely affects its reputation or public interests.

- The consumption, sale, purchase, offer to sell or purchase, transfer, possession, manufacture, distribution, or dispensation of alcohol or a prohibited drug by any employee while in a Company facility, in a Company vehicle, on Company property, while in Company uniform (including breaks, lunch, and non-work hours) or while performing Company business is strictly prohibited. Violations of the Kodiak Substance Abuse policy are grounds for immediate disciplinary action up to and including dismissal.

- All employees are responsible to watch for potential or actual violations, and, where observed to immediately report the violation to their supervisor and the Safety Director.
- The Company will require a drug and/or an alcohol test of any employee who is reasonably suspected of violating this policy, including but not limited to, any employee suspected of possessing, using, or being under the influence of alcohol, an illegal drug, or a legal drug if such use would violate of this policy, while on duty, in Company vehicles, on Company property, or in Company uniform

# V. PERSONAL PROTECTIVE EQUIPMENT (PPE)

The use of personal protective equipment (PPE) is an important part of preventing injuries to employees. Kodiak personnel are reminded that PPE is considered that last line of defense against potential injuries in the workplace. Personal protective equipment must be used according to the manufacturer's instructions and shall be kept clean and in good repair to be effective at preventing injuries. It is prohibited to use defective or damaged PPE. Employees shall only use properly fitted and maintained PPE. Any equipment interchanged among employees must be properly inspected and cleaned between uses.

### Training

Employees shall be trained in the proper use and care of PPE. Training and retraining shall be documented by Kodiak's Safety Director (see Record Keeping in section J). Kodiak employees shall be trained on the following:

- Hazard recognition and situations requiring PPE
- Hierarchy of exposure controls
- Proper care, use and storage of PPE
- Proper cleaning
- Inspection procedures
- Proper donning and removal procedures of PPE

### Retraining

Kodiak employees shall be re-trained on the proper use and care of PPE under the following conditions:

- Periodic training on the need for PPE and its proper use through Tailgate Safety Meetings
- It is determined that the affected employee does not have the knowledge, understanding or skill necessary to use the PPE correctly
- If the brand, style or features of the PPE changes
- New procedures/processes requiring the use of new types of PPE
- When Kodiak determines that the affected employee is using the PPE in a manner inconsistent with the manufacturer's recommendations.
- Kodiak shall be responsible for employee-owned PPE and it shall be inspected by Kodiak management to ensure compliance with Kodiak's PPE Program before initial use.

### Hazard Assessment

The Kodiak Safety Director shall conduct a hazard assessment to determine what hazards exist in the workplace and jobsites/projects where Kodiak personnel are assigned to work. This hazard assessment

shall be conducted and certified by the Kodiak Safety Director on an annual basis. This assessment shall be documented and filed accordingly. The results of this certified assessment shall assist in determining the minimal PPE that is required to be used by Kodiak personnel during their work assignments. In addition, Kodiak personnel are encouraged to provide feedback on the following to ensure that the PPE selected will be most effective in protecting against potential hazards:

- Comfort and fit
- Durability
- Effectiveness
- Ease of use
- Ease of cleaning/maintenance

The minimum required PPE on all Kodiak jobsites/projects and/or warehouses shall consist of the following:

**Head protection** – All Kodiak employees are required to wear a hard hat while working at Kodiak jobsites/projects. The hard hat must meet ANSI Z89.1 standard. The inside suspension must be intact and in good repair for the hard hat to be effective head protection. Where there is a risk of long hair becoming entangled with machinery or exposure to combustibles or contaminants, employees shall confine (tie back or up) their hair to eliminate the hazard.

**Foot protection** –Durable, sturdy work boots are required on all job sites. Care should be taken to ensure that work boots are slip resistant on wet and dry surfaces. Work boots must have ankle high side walls. Steel toe boots are required when workers are exposed to crushing injuries. **Tennis shoes or soft shoes are prohibited on Kodiak job sites.**

**Eye and face protection** – Eye protection with side shields are required at all times while working on Kodiak job sites. Employees are required to wear ANSI Z87 rated safety glasses to protect eyes from injuries resulting from flying objects, dust and dirt particles and debris. Goggles or face shield in conjunction with safety glasses shall be used when:

- Grinding, cutting or sawing with power tools.
- Handling solvents or other hazardous chemicals.
- Where there is the hazard of hot asphalt or other liquids or chemicals splashing into face or eyes.
- Approved welding goggles, masks or shields with suitable filter lenses shall be worn while welding.

**Clothing -** Appropriate body protection shall be required for employees whose work exposes them to injurious materials. ANSI Class II safety vests are required when personnel are exposed to vehicular traffic. For personnel not exposed to vehicular traffic, a safety vest or Kodiak High-visibility shirts (orange or safety green/yellow) are required on all Kodiak job sites to facilitate identification of employees to supervisors, other tradesmen. The use of vests or approved shirts makes it possible for equipment/machinery operators to see employees thus avoiding injury to employees from said equipment/machinery. In addition the following shall be observed:

- Safety vests and approved High-visibility shirts must be worn on the outside of clothing be effective.
- Tank tops, cut- off shorts or shirts are prohibited.
- Hot operations require long sleeves buttoned at the wrist and long pants without cuffs.
- Clothing appropriate for the work shall be worn.
- Loose sleeves, cuffs or other clothing shall not be worn around machinery.

**Hand Protection -** Hand protection shall be appropriate for the work being performed and shall be required for employees working under the following conditions:

- When exposed to possible cuts, burns or other harmful physical or chemical agents.
- Leather gloves are appropriate for welding or working with lead or lead compounds.
- Cotton gloves with a knitted wrist are appropriate for hot operations.
- Cut resistant Kevlar gloves with rubber palms are approved for metal roofing operations.
- Rubber palmed gloves are prohibited for an employee using a metal shear or brake where there is a possible crushing hazard.
- Latex gloves are required for using solvents and membrane cleaners and are recommended when handling bonding adhesives and cleaners.

**Hearing/Ear Protection -** Employees exposed to excessive noise levels shall have hearing protection provided. Employees shall be made aware of situations where they will be exposed to sound levels equivalent to an average of 85 decibels (dB) over an 8-hour period. Hearing protection shall be made available in these situations. If you must shout to communicate with someone who is 3 feet or closer to you, the sound level is above 85 db**.**

# W. FALL PROTECTION

Working at heights is an inherently dangerous activity. Although it is impossible to eliminate every risk entirely, Kodiak uses fall protection equipment that has been engineered to reduce the risk of injury substantially. We remind our employees and those working with our organization that most injuries from falls are the result of:

- not using fall protection equipment
- abused or faulty equipment
- lack of training on the correct use of the equipment
- failure to follow the manufacturer's instructions
- Simple failure to use good judgment.

It is the duty of each Kodiak employee or user to ensure that the equipment is:

- inspected before each use for proper working condition
- used in the way that the manufacturer intended it to be used
- And the proper safety procedures are being followed, as detailed in the Kodiak Injury and Illness Prevention Program.

All employees are required to have completed training on the recognition of fall hazards and the proper use of fall protection equipment before any work can begin. Employee re-training is mandatory for those involved in a fall protection near miss or accident. Retraining shall include recognition of fall hazards and the proper use of fall protection equipment.

# X. HOT OPERATIONS

Built-up roofing is one of the most hazardous of roofing operations. It involves the application of hot asphalt/rubber/materials heated up to 500 degrees, the presence of a tank of liquid propane and the coordination efforts of a crew to apply the hot asphalt in a timely manner. The safety of the workers is a challenging task. There is no room for carelessness or error in performing this operation.

A job must be evaluated be the Safety Director, project manager, superintendent and foreman prior to the start of the job. The following shall apply to hot operations.

## General Procedures

Workers are to wear appropriate personal protective equipment consisting of:

- Long sleeves shirt, buttoned at the wrist.
- Long pants with no cuff.
- Work boots securely laced.
- Cotton or leather gloves with a snug fitting wrist.
- A kettle-man is to wear a Kodiak vest or high-visibility shirt (orange or yellow) hard hat and safety glasses in addition to a face shield.
- At a minimum, there are to be three (3) fully charged fire extinguishers on site during kettle operations. Two 20:ABC (20lbs) within 25 feet of the kettle and propane tank and one 10:ABC or larger on the roof or application area.
- A fire extinguisher shall be located on the roof within 50 feet of the roofing operations and located so that is readily visible, and accessible.
- Employees shall restrict access to tankers and kettles in which materials are being heated for application to those employees whose job responsibilities require them to be present.
- Employees shall not heat any material to a temperature that is higher than the manufacturer's specifications for that material.
- Employees shall verify the temperature of heated materials with a thermometer on a regular basis, to ensure that the materials are not being heated higher than applicable manufacturer's specifications.
- Employees shall not carry buckets containing hot materials up or down a ladder.
- Employees shall work upwind from tankers and kettles whenever it is practical to do so.
- There is to be no smoking within 50 feet of the propane tank.

## Kettle Set-Up

- The kettle is to be set up and operated by a properly trained person.
- Ensure the equipment is in good repair, check hoses, gauges, tanks, etc.
- Make sure the kettle lid fits properly.
- Select a clear and level area on firm ground to locate the kettle setup.
- Setup a barrier around the kettle area comprised of traffic cones or delineators, and safety tape. In high traffic areas, such as schools, snow fence or a portable fence is recommended.
- Locate the kettle near the roof work area.
- Set the kettle close to the building to minimize stress on the hot pipe. Distance should be eight (8) to ten (10) feet.
- Avoid electrical lines, air intakes into buildings and high traffic areas.
- Protect the grounds with plywood, visqueen or some other protective cover. This will protect private property and make clean up easier.
- Set the kettle in a position that is level and stable.
- Chock the wheels.

- Setup warning lines around the kettle.
- Keep unauthorized personnel out of the kettle area.
- Do not override the pilot valve on the kettle. If it is not functioning on automatic, call the mechanic or request another kettle.
- Employees shall position tankers and kettles as close to the point of application as practical to minimize heat loss.
- The propane tank is to be placed a minimum of 25 feet from the kettle or any other source of heat or flame.
- Smaller, portable propane tanks are to be transported and stored upright and secure.

**Kettle Operation**

- Monitor the temperature with the thermometer provided.
- Be aware of the location of the fire extinguishers and keep them in sight.
- Cut the plugs of asphalt into smaller more manageable chunks.
- Avoid splashing when loading the kettle.
- Employees will keep kettle lids closed except when it is necessary to:
  - add or remove material to the kettle,
  - check the temperature of the material in the kettle,
  - check the volume or quality of the Material in the kettle
- Practice good housekeeping around the kettle area.
- Before firing the kettle, make sure the tubes are covered with bitumen.
- Anytime you are attending the kettle, wear a hard hat and face shield - no exceptions.
- Do not overheat the asphalt (550 degrees F Max). This can result in a kettle flash or fire and will cause excessive build-up of carbon in the kettle.
- Before lighting the kettle, open the exhaust vents to prevent flashback.
- Begin heating the kettle slowly. Heating the pipes too fast will cause damage to the tubes.
- Kettle shall be attended when heating materials to operating temperature. Attended means: within eyesight and on the same level and within 25 feet of the kettle.
- Ensure the kettle is operating properly and that the thermostat is functioning before leaving the kettle unattended.
- Never leave a manually operated kettle unattended.
- Never pour water on or in a kettle.

**Hot Line Setup**

- Check sections of hot pipe before assembling for safe operation.
- If a pipe is cracked, bent, welds or unions are defective, replace the sections.
- Screw sections together and ensure they are fully seated.
- At flex hose and discharge area, secure the pipe to a stand or guardrail.

**Fire/Accident Prevention**

- Yellow smoke indicates a kettle is too hot and may be ready to flash. REDUCE HEAT IMMEDIATELY!
- A kettle flash is explosive and can injure anyone in the immediate area near the kettle.
- A kettle flash may be caused by the following:

- Overheating material.
- Too little material in the kettle, resulting in exposed tubes.
- A kettle setup unevenly allowing a tube to be exposed.
- If a kettle should flash, attempt to extinguish it by:
  - Shutting off the fuel source and closing the lid.
  - If this fails use the fire extinguisher.
  - If a structure is endangered or a fire appears to be getting out of control, call 911 for assistance.

### Roof Top Operations

- Always signal to other employees when transporting hot across the roof in a high boy or mop cart.
- Never work closer than ten feet of a leading edge with using a felt machine.
- Observe and practice all applicable fall protection per Kodiak and OSHA standards.
- Do not fill buckets more than ¾ full.
- Never pour hot material into a bucket with excess moisture or water. It can boil or explode.
- Move mop buckets and high boys slow and steady.
- Work with hot at an even an even pace. Rushing can lead to accidents.
- Respect the hazard that hot asphalt represents and be aware of the safety of others.

### Transporting Kettles

- Ensure that the hitch is functioning properly and that it is properly rated for the tongue weight and towing weight of the kettle.
- Attach the safety chain(s) to the towing vehicle prior to towing.
- Ensure the draw valve and kettle openings are closed.
- Do not pull a kettle while it is hot. Allow it to cool for a minimum of two to three hours. Maximum temperature for towing is 212 degrees per DOT regulations. If it is too full, it may need to be transported the next day.
- Allow additional space between vehicles for safe braking due to the weight of the kettle and contents.
- Make sure brakes are functioning properly on two vehicles before towing kettle.
- Do not exceed posted speed limits for vehicles with trailers.
- Be sure tires are inflated properly before towing.

## Y. SPRAY OPERATIONS

Spray equipment generates very high fluid pressure and as a result can cause serious injuries if not used properly. The manufactures operating guidelines and safety procedures will drive safety procedures for spray operations.

**FLUIDS FROM SPRAY GUNS, LEAKING OR RUPTURED COMPONENTS CAN INJECT FLUID THROUGH YOUR SKIN RESULTING IN SERIOUS INJURIES, AMPUTATION AND /OR DEATH.**

### General Procedures

- Never point to a spray gun at anyone or any part of the body.

- Never put a hand or finger over the nozzle.
- Always relieve pressure from the system before cleaning or removing the nozzle or servicing any part of the equipment.
- Never try to stop or deflect leaks with your hand or body.
- Be aware and ensure that all gun safety devices are operating properly before use.
- Always set the gun safety latch in the closed or "safe" position making the gun inoperative when you stop spraying.
- Always have the trigger guard in place when spraying to reduce the risk of accidentally triggering the gun if it is dropped or bumped.
- Never wipe off build-up around the spray tip until pressure is fully relieved and the gun safety latch is secured.

**Misuse Hazards**

- Misuse of spray equipment or accessories, such as over-pressurizing, modifying parts, using incompatible chemicals or fluids can cause equipment/component failure, rupture which can result in fluid injection, splashing on the skin and/or eyes, serious bodily injury, fire, and/or explosions or property damage.
- Never alter or modify any component or equipment from the manufactured original design.
- Check all spray equipment regularly and repair or replace worn or damaged parts immediately.

**Personal Protective Equipment**

- Always wear protective eyewear, gloves and clothing as recommended by the fluid or solvent manufacturer.
- Kodiak approved vests, high-visibility shirts, hard hats, Safety Glasses, and work boots shall be worn on all Kodiak jobsites.
- Always wear recommended respiratory protective equipment.
- Medical surveillance is required for respirator use.
- Additional training is required for respirator use.
- Roof top applications will follow Kodiak and OSHA established programs for fall protection, ladder safety and job setup.

**Hose Safety**

- High pressure fluid in the hoses can be very dangerous.
- Leaks, splits or ruptures can result in fluid injection.
- Tighten all fluid connections securely before each use.
- Never use a damaged or defective hose.
- Inspect all hoses for cuts, leaks, abrasions, bulges or damaged couplings before each use. If any defect is noted, replace the hose immediately.
- Do not pull hoses to move equipment.

## Fire, Explosion and Shock Hazards

Static electricity is created by the flow of fluid through the pump and hose. Sparks created from static electricity can ignite fumes from solvents or the fluid being sprayed. The following precautions shall be followed:

- Equipment shall be properly grounded.
- Connect a ground wire and clamp to a true earth ground from the pump.
- Use only grounded hoses with a maximum combined hose length of 500'.
- If you experience any static sparking or even a slight shock while using the equipment, **STOP SPRAYING IMMEDIATELY!!**
- Determine cause of any static, shock and correct problem before work continues.

## Medical/First Aid

Wounds from fluid penetration must be treated immediately. Chemicals and fluids can be toxic and can cause health problems if not treated promptly and properly. The following shall apply for injection injuries:

- Emergency medical care should be sought for injection injuries.
- Inform the treating physician/ medical personnel the nature of the wound and the toxicity of the fluid injected.
- Safety Data Sheets SDS shall be provided to the treating physician/medical personnel.
- Flush eyes at an emergency eyewash station or with clean water and seek medical attention promptly.

# Z. SINGLE PLY OPERATIONS

The application of single ply or monolithic roof membranes presents a set of hazards distinctly different from other types of roofing. Fire and burn hazards are minimized or eliminated, but the product presents hazards for slips and falls due to the smooth surface of the material. There are tools and materials used in the application of these products which need to be addressed.

### General Safety

- Footwear for single ply roofing applications needs to address the slip/fall hazards present. In this application work boots with flexible slip resistant soles are preferable.
- Ladder safety guidelines shall apply.
- Observe and practice applicable fall protection per Kodiak and OSHA standards.
- All equipment needs to be equipped with GFI's (ground fault interrupters). This can be accomplished with the utilization of a generator that is equipped with a built-in GFI or the addition of a GFI extension (pigtail).
- Generators must be turned off, allowed to cool and properly grounded prior to re-fueling.
- A Fire extinguisher shall be on the roof, within eyesight and within 50 feet of the workers performing roofing operations.
- Practice good housekeeping habits to avoid slips, trips and falls.

### Hot Air Welded Systems

Hot air guns can damage material and cause burns or other injuries if not used properly. The following shall apply:

- Hot air guns must be used in a way that prevents overheating the material and causing a potential for a fire.
- Avoid directing the heat gun at hands or other body parts.
- Allow heat guns to cool to the touch prior to storing and transport.
- Hot air guns must be kept in good repair, inspect cords for cuts, burns and tears.
- Tag and remove defective equipment from service
- Hot air guns shall be operated in conjunction with a Ground Fault Interrupter (GFI).

### Solvent Welded System

Solvents and chemicals used improperly can be hazardous to employees as well as other personnel on the jobsite. The following shall apply:

- Use solvent/chemical products according to the manufacturer recommendations.
- Use solvents/chemicals in well ventilated areas.
- Store solvent/chemicals in their original container and ensure that labels are affixed identifying chemicals and their properties.
- Ensure that there is adequate ventilation when applying products.
- Keep solvents/ chemicals away from sources of heat and flame.
- Ensure the appropriate Safety Data Sheets (SDS) for each solvent, chemical and other materials (dens-deck, membrane, etc.) are available onsite at all times.

## AA. EMPLOYEE ACKNOWLEDGMENT

I have received my copy of the Company's Injury and Illness Prevention Program. I understand and agree that it is my responsibility to read, understand and follow the policies and procedures contained in the program. I have received information and training on the following:

- ✓ Injury and Illness Prevention Program
- ✓ Code of Safe Practices specific to the work assigned
- ✓ Proper work shoes and other Personal Protective Equipment (PPE)
- ✓ Safe use of tools and equipment
- ✓ Safe handling of product and materials
- ✓ Lifting, and use of lifting equipment such as hoists and cranes
- ✓ Heat Illness Prevention Program
- ✓ First Aid Program
- ✓ Fire Prevention Plan
- ✓ Emergency Action Plan
- ✓ Hazard Communications Program, SDS and the potential hazard of chemicals I may be exposed to
- ✓ Respiratory Protection
- ✓ Lock Out Tag Out Procedures
- ✓ Mobile Equipment Operation
- ✓ Fall Protection
- ✓ Hearing Conservation
- ✓ Bloodborne Pathogens
- ✓ Stop Work Authority and my right to stop working when I feel a situation is unsafe
- ✓ Fleet Safety

Employee's Name _____

Signature _____

Date: _____

# V. FORMS FOR SAFETY PROGRAM IMPLEMENTATION

The following is a list of available forms:

Accident/Incident Forms
Employee's Report of Accident
Accident Investigation Form
Denial of WC And Medical Treatment
DWC-1 Employee's Claim Form for Workers' Compensation Benefits
Motor Vehicle Accident Report
Appendix A – Identification of COVID-19 Hazards
Appendix B – COVID-19 Investigation
Appendix C – Investigating COVID-19 Cases

Communication
Employee Safety Suggestion Form
Near Miss Incident Report
Notice of Safety Infraction
Hazard Identification and Control
Job Hazard Analysis Form (JHA)/Pre-Task Plan (PTP)
Daily Job Site Inspection Checklist
Silica Exposure Control Plan Worksheet
Facility Inspection Checklist
Vehicle Inspection
Rough Terrain Forklift Inspection Checklist
Forklift Inspection Checklist
Boom Lift Inspection Checklist
Scissor Lift Inspection Checklist
Heat Illness Prevention Checklist
Hot Work Permit
Office Ergonomic Evaluation Form

Training
Initial Safety Training Acknowledgment
Employee Training Roster/Sign in Sheet
PPE Acknowledgment Form

Respiratory Protection
Medical Evaluation Questionnaire
Fit Testing and Assignment
Appendix D – Voluntary Respirator Use

Bloodborne Pathogens
HEP B Vaccination Request/Declination Form
Exposure Incident Notification

***Forms attached Separately***