

William Warren Properties

Accident Prevention & Safety Manual

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Corporate Safety Policies and Procedures

Many companies have written safety plans for individual safety topics, but few have an umbrella plan to summarize overall safety. This safety policy states William Warren Properties overall view of safety and the tenets of the safety program for our various work sites.

In order to establish and organize good safety policies and procedures, this General Safety Policies and Procedures Written Plan summarizes information regarding safety policies and procedures at this Company. Traci Young, Safety Manager, is responsible for implementing and updating this plan. The plan is kept in the Safety Manager's Office and access is provided to all employees electronically.

General Company Safety Philosophy Statement

This general Company safety philosophy has been developed to reflect and communicate the proactive safety attitude maintained at this Company. The Company will comply with appropriate safety and security laws and regulations such as those established by:

- The Occupational Safety and Health Act (OSHA),
- The EPA (Environmental Protection Agency),
- The DOT (Department of Transportation), and
- All other applicable federal, state, and local safety and health regulations.

In addition, we believe that the safety of employees is of utmost importance, along with quality, production, and cost-control. Maintenance of safe operating procedures at all times is of both monetary and human value, with the human value being far greater to the employer, the employee, and the community. The following principles support this philosophy:

- All injuries and accidents are preventable through establishment and compliance with safe work procedures.
- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace actions and are the responsibility of every employee at every level.
- Written safety plans describing the safe work practices and procedures to be practiced in all workplace actions are an essential element of the overall workplace safety program. All employees at every level are responsible for knowing and following the safety practices described in the written safety plans.
- Off the job, all employees should be similarly safe and demonstrate awareness of potential hazards.

Types of Written Safety Plans In Place

Because we care about our employees and strive to provide a safe work place, we have put into place a number of written safety plans. These written plans provide guidance and direction for the safety issues they cover. Those plans are covered throughout this Accident Prevention and Safety Manual.

Employer/Employee Responsibilities

It is the policy of this Company to provide a place of employment reasonably free from hazards which may cause illness, injury, or death to associates. It is also this Company's policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach

safety, correct deficiencies, and provide a safe, clean working environment. All Company supervisors, managers, directors, and officers are responsible for the enforcement of safety policies and practices. They must ensure that:

- Their staff members are trained in appropriate safety procedures, including chemical-specific training as required. Individual safety files are maintained in Personnel for all associates.
- They notify the Safety Manager and complete the necessary forms if an accident or work-related health problem occurs in the work area.
- Equipment and property within their area of responsibility is maintained in a safe, hazard-free condition

All employees have a responsibility to themselves and to the Company for their safety and the safety of the coworkers. All employees are required to:

- Comply with all federal, state and local rules and regulations relevant to their work.
- Observe all Company rules and regulations related to the efficient and safe performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of job duties.
- Report or correct unsafe equipment and practices.
- Report any accidents that occur while on the job.

Disciplinary Policy

All safety rules, procedures, and plans in effect at this Company are intended to be followed. Upon violation of any Company safety rule, the violating employee will be disciplined. The list of possible disciplinary actions includes:

- Verbal warning: An informal discussion of the incorrect behavior that should take place as soon as possible after the supervisor has knowledge of the safety misconduct.
- Written warning: A written form documenting the safety misconduct, to be presented to the employee and placed in the employee's personnel file.
- Probation: A trial period during which the employee is given specific rules and goals to meet, during which, if he or she cannot meet the rules and goals, he or she is subject to termination.
- Suspension: A period of time during which the employee is debarred from the function of attending work and during which the employee is not paid.
- Dismissal/termination of employment: The permanent separation of an employee from the Company, initiated for disciplinary reasons, safety misconduct

Certain circumstances warrant disciplinary action. Upon violation of any Company safety rule, the violating employee will be penalized. The severity of the penalty will be in direct correlation to the severity of the safety violation.

Designated Safety Manager

The designation of a Safety Manager is the most critical part of preparing ourselves to succeed or fail with the establishment and maintenance of our company safety program. The designated Safety Manager is the glue that holds the many aspects of your program together.

William Warren Properties has designated Traci Young as our Safety Manager.

The key critical ingredients considered in making this decision were:

1. **Willingness**: The person chosen must indicate a genuine interest and desire to do this work.
2. **Knowledge**: A college degree in Safety and/or experience in the field are necessary for a full time Safety program.
3. **Money**: A budget needs to be established for this program to, at a minimum, include the following.
 - Reference material – websites, online guides, books, etc.....
 - Designated person attending seminars.....
 - Safety meetings.....
 - Incentive Program.....
4. **Accountability**: The person to fulfill these tasks must be accountable only to the company CEO in all matters of safety and health for these reasons:
 - This plainly demonstrates top management’s commitment to the safety program.
 - Keeps top management in the loop and provides for guidance at all stages of the program.
 - Prevents creativity of the designated safety person from being thwarted or stifled by intermediate supervisors who are unaware of the tremendous negative impact OSHA fines and increased workers’ compensation premiums can have on the company’s bottom line.

Job Responsibility Definitions

Safety Manager Responsibilities

1. Will be responsible for the administration and implementation of the Safety and Health Regulations as they apply to William Warren Properties. In addition, he/she will administer the company safety program and see that it is put into effect and administered as outlined below.
2. Will see that an annual report is completed, listing all accidents which occurred during the year. These will be reviewed to determine type and degree of accident so that corrective measures may be taken through safety talks to personnel, bulletins to employees, purchase of new equipment, or change in work procedures.
3. Will see that all sub and trade contractors abide by their safety and health program and that documentation is made of any alleged violations.
4. Will maintain and update a set of basic safe work rules. These safety rules will be explained by the company Safety Manager to the Chief Operating Officer (COO), Corporate Managers and District Managers, who, in turn, will discuss these with employees during on-the-job safety talks. Company safety rules will be posted in the necessary work areas.
5. Will periodically conduct safety inspections and file reports.
6. Will provide safety training for employees.
7. Will read, review and provide the Corporate Managers and District Managers with updated OSHA

Safety Standards.

8. Will make necessary corrections in company policy and work procedures by advising of changes in OSHA rules and regulations.
9. Through the purchasing section within the Operations Department, will see that all vendors are advised of the company safety and health programs as they apply to the vendor and supplier personnel entering the job site. In addition, all purchase orders will require compliance with OSHA Act.
10. Will meet regularly with supervisors/management to review safety procedures on the job, and, in general, check on the supervision's compliance with the company safety and health program.

VP of Operation's Responsibilities

1. Read and review the OSHA Safety Standards and become knowledgeable of federal, state and local standards.
2. Responsible to see that a study is made of the work area(s) to determine the exposure to accidents, which may develop. Particular attention will be given to the protection of the public and to fire prevention facilities.
3. Be safety oriented when walking through work areas. Report to the Safety Manager all unsafe acts and conditions either of your company's or sub or trade contractor's personnel.
4. Review all accident reports.

District Manager's Responsibilities

1. The district manager is responsible for the implementation of the company safety and health program.
2. Make available all necessary personal protective equipment, job safety materials and First Aid equipment.
3. Instruct the employees that safe practices are to be followed and safe conditions maintained throughout the job.
4. Inform their employees that they are not to require nor permitted to take chances -rather they should instruct their employees in proper and safe procedures.
5. Instruct employees individually, regarding their safety responsibilities.
6. Require all contractors and their prime subcontractors to adhere to all safety regulations. The district manager will report any unsafe conditions on contractor portions of the work to the Safety Manager.
7. Review all accidents and see that corrective action is taken immediately.
8. Be familiar with the laws pertaining to safety and their basic requirements.
9. Investigate all accidents. File a complete accident report with the Safety Manager and correct the causes immediately. Use OSHA Form 301 or its equivalent.
10. Be familiar with the laws pertaining to safety and their basic requirements.

Corporate Manager's Responsibilities

1. A corporate manager is responsible for the implementation of the company safety and health program.
2. Instruct employees individually, regarding their safety responsibilities.
3. Require all contractors and their prime subcontractors to adhere to all safety regulations. The district manager will report any unsafe conditions on contractor portions of the work to the Safety

Manager.

4. Review all accidents and see that corrective action is taken immediately.
5. Be familiar with the laws pertaining to safety and their basic requirements.
6. Investigate all accidents. File a complete accident report with the Safety Manager and correct the causes immediately. Use OSHA Form 301 or its equivalent.
7. Be familiar with the laws pertaining to safety and their basic requirements.

Employee Responsibilities

1. Work according to good safety practices as posted, instructed and discussed.
2. Refrain from any unsafe act that might endanger himself/herself or his/her fellow workers.
3. Use all safety devices provided for his/her protection.
4. Immediately report any unsafe situation or acts to his/her district manager or safety personnel.
5. In the event of an injury, report to the designated area for First Aid treatment. In all cases, the employee, the district manager or property manager will report and/or record all accidents.
6. Maintain a clean and safe work area.
7. Be a safe worker, off the job, as well as on.
8. All safety concerns can be reported as well to this email alias the company provides:
safety@williamwarren.com.

Safety Responsibilities

1. In general, the Human Resources (HR) Department will serve in an advisory capacity to the managers on determining a general plan of action for the company's safety policy.
2. More specifically, the managers will familiarize themselves with safety standards and assist in formulating plans for the application of the standards in all work areas.

Training Policy

William Warren Properties is committed to instructing all employees in safe and healthy work practices. The Company will provide training to each employee with regard to general, acceptable, safety procedures and to any hazards or safety procedures that are specific to that employee's work situation.

1. Training can take many forms and is synonymous with education and can be attained in a number of ways.
2. Company Safety Rules: Employees should read the rules and understand them. The issuance of these rules should be logged and signed receipts should be kept on file. Each new employee, as he/she arrives on the job, should be approached in the same manner.
3. Periodic Safety Talks: The Company should attempt to hold a safety talk with their employees on an annual basis. The talk may consist merely of restating the company safety rules or warning of dangerous conditions which exist. A particular subject may be covered, such as lockout tagout, confined space, or fire prevention.
4. Changed Conditions: When the job operation changes or when new hazardous materials are brought into the workplace, employees should be made aware of new or added potential dangerous situations that might occur and the proper action employees can take to maintain a safe workplace.
5. Safety Equipment: Employees should not simply be issued protective equipment. They should be instructed as to its proper and safe use.
6. Consistency/Redundancy: The employer must consistently and routinely entertain the concept of safety training. Once is not enough. At the orientation meeting of new employees, on through the follow-up safety talks, the central theme must be to dwell on employees not committing unsafe acts.
7. Management Follow-Up: Management must not be content with advising employees on unsafe practices. A follow-up of employee actions must be made. The Supervisor(s) must be instructed to watch for employees committing unsafe acts. Employees should be disciplined when found doing unsafe acts. (See disciplinary program)
8. Documentation: All actions taken by Management as it relates to Safety Training/Education should be documented. Documentation of good faith efforts in meeting the training requirements can be invaluable in defending a lawsuit that results from an injury due to an unsafe act by an employee. Also, documentation substantiates your commitment to and compliance with the OSHA Training Requirements.
9. Individual/Group Instruction: Safety Education can be aimed at a group such as at a quarterly safety talk or at an individual as in a case where the employee is being given instruction on use of a new tool, etc., by the district manager. Whichever the case may be, it should be documented.

In Closing

Safety training must be ongoing. It must be given to all employees and members of management. Documentation of instruction and other forms of safety awareness techniques must be made. Never assume everyone knows the safest way of performing his or her task.

Disciplinary Action Program

Role of Disciplinary Systems in the Workplace

The disciplinary system does not exist primarily to punish employees. Its purpose should be to control the work environment so that workers are protected and accidents are prevented. A disciplinary system helps ensure workplace safety and health by letting the William Warren Properties employees know what is expected of them. It provides workers with opportunities to correct their behavior before an accident happens.

A disciplinary system is one of the keys to successfully implementing the Company's safety and health program. It ensures that the Company's rules and safe working practices are taken seriously by employees and are actually followed. It lets employees know how William Warren Properties expects them to operate in relation to the goals of the Company's safety and health program. And it lays out the actions the Company will take if individuals do not meet the Company's expectations. The employee's supervisor and all members of management are responsible for the enforcement of this disciplinary program.

A disciplinary system cannot work in a vacuum. Before the Company can hold employees accountable for their actions, the Company first needs to establish its safety and health policy and disciplinary rules.

Policy Statement

Employees need to know the Company's position on safety and health and what the Company expects of them. They need a clear understanding of the rules and the consequences of breaking those rules. This is true in all areas of work, but it is especially important for worker safety and health. As part of the policy statement, and in the employee handbook, the Company has a written statement setting forth the Company's disciplinary policy. Company managers and supervisors will always be on the lookout for safety violations and will conscientiously and vigorously enforce the Company's commitment to safety.

Employee Information and Training

It is important that employees understand the system and have a reference to turn to if they have any questions. Therefore, in addition to issuing a written statement of the Company's disciplinary policy, the Company has drawn up a list of what it considers major violations of Company policy and less serious violations. This list specifies the disciplinary actions that will be taken for first, second, or repeated offenses.

The list for immediate termination and grounds for immediate discharge are:

- Drinking alcohol, and/or drug abuse prior to or during working hours
- Fighting, provoking or engaging in an act of violence against another person on Company property
- Theft
- Willful damage to property
- Failure to wear Personal Protective Equipment (eye protection, hearing protection, safety helmets, etc.).
- Not using safety harnesses and lanyards when there is a potential for falling

- Removing and/or making inoperative safety guards on tools and equipment
- Tampering with machine safeguards or removing machine tags or locks
- Removing barriers and/or guardrails and not replacing them
- Failure to follow recognized industry practices
- Failure to follow rules regarding the use of company equipment or materials
- Major traffic violations while using a company vehicle
- Engaging in dangerous horseplay
- Failure to notify the Company of a hazardous situation and
- Other major violations of company rules or policies

General Offences requiring a warning and can lead to termination:

- Minor traffic violations while using Company vehicles
- Creating unsafe or unsanitary conditions or poor housekeeping habits
- Threatening an act of violence against another person while on company property
- Misrepresentation of facts
- Unauthorized use of Company property
- Excessive tardiness and late to work
- Disrespect and/or insubordination to authority
- Other violations of Company Policy and rules

Training

Training can reduce the need for disciplinary action. The Company shall instruct employees in the importance of workplace safety and health, the need to develop safety habits, the Company's operations, safe work practices, and the hazards they control, and the standards of behavior that the Company expects. The Company's employees must understand the disciplinary system and the consequences of any deliberate, unacceptable behavior.

Supervision

Supervision includes both training and corrective action. Ongoing monitoring of the Company's employees' work and safety habits gives the Company's supervisors the opportunity to correct any problems before serious situations develop. In most cases, effective supervision means correcting a problem before issuing any punishment.

Where the relationship between employees and their supervisors is open and interactive, problems are discussed and solutions are mutually agreed upon. This type of relationship fosters a work environment where the need for disciplinary action is reduced. When such action is needed, the parties are more likely to perceive it as corrective then punitive.

Employee Involvement

Employees are encouraged to help informally in the enforcement of rules and practices. The intent here is not to turn employees into spies and informers, but to encourage them to be their "brother's keeper" and to watch out for the safety and health of their colleagues. Many employers successfully have encouraged an

atmosphere -- a company "culture" – where employees readily speak up when they see an easily corrected problem, for example, a coworker who needs reminding to put on safety goggles.

The Company's employees deserve the opportunity to correct their own behavior problems. An effective disciplinary system is a two-way process. Once a problem is spotted, discuss it with the employee, who should be given at least one or two opportunities to change the behavior or correct the problem. Only after these discussions (and possibly some retraining) should disciplinary action be taken.

Appropriate Control Measures

Disciplinary actions need to be proportionate to the seriousness of the offense and the frequency of its occurrence.

Disciplinary procedures should not be instituted without explanation. The Company will provide feedback to the employee on what behavior is unacceptable, why the corrective action is necessary, and how the employee can prevent future violations and disciplinary action. In addition, take time to recognize an employee who improves or corrects his/her behavior.

Consistent Enforcement

Workers must realize that safe work practices are a requirement of employment and that unsafe practices will not be tolerated. It is necessary, therefore, that the employer has a disciplinary system that is implemented fairly and consistently.

If the Company's disciplinary system is to work well and be accepted by the Company's workforce, the system applies equally to everyone. This includes subjecting managers and supervisors to similar rules and similar or even more stringent disciplinary procedures.

For minor violations, supervisors shall meet with the employee to discuss the infraction and inform the employee of the rule or procedure that was violated AND describe the corrective action needed to remedy the situation.

Documentation

One key to ensuring fairness and consistency in a disciplinary system is keeping good records. It is in the best interest of both the Company and the employee to have written rules and disciplinary procedures. It is just as important to document instances of good or poor safety and health behavior, including discussions with the employee, and to place relevant information in the employee's personnel file. The "Safety Hazard Citation" is to be used document infractions. This form is located in the appendix.

Documentation serves a variety of purposes. It helps the Company to track the development of a problem, corrective actions, and the impact of measures taken. It provides information so the Company can keep employees informed of problems that need correction.

When the Company is evaluating the managerial and supervisory skills of a supervisor, it provides a useful record of how they handled problems. If warnings, retraining, and other corrective actions fail to achieve the desired effect, and if the Company decides to discharge an employee, then documentation becomes even more critical.

Minor safety violations will be documented and a copy of the below form will become part of the employee's personnel record:

A copy of the Safety Hazard Citation will be placed in the employees Employment File
Three Citations can be grounds for termination

Positive Reinforcement

Each supervisor should provide frequent reinforcement of work practices training. The informal observation described above serves not only to gauge training effectiveness, but also to reinforce the desired behavior.

Recording and Reporting Injuries and Illnesses

Purpose

This Recording and Reporting Occupational Injuries and Illnesses Compliance Program (RROIICP) explains our company's process for meeting the requirements of OSHA 29 CFR 1904. This regulation allows the Bureau of Labor Statistics under the U.S. Department of Labor to uniformly gather statistics on occupational injuries and illnesses. With this data, the Occupational Safety and Health Administration (OSHA) can identify and solve work-related exposures nationwide through new and revised regulations and guidance.

At the same time, the data can help William Warren Properties identify its own company exposures and solve them with improved engineering, administrative, and work practice controls. It is essential that data we record be uniform, to assure the validity of the statistical data. This program is ultimately designed for the safety and health of our employees.

Administrative Duties

The Safety Manager, is also our RROIICP Administrator, is responsible for developing and maintaining this written 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 Manager's office. If after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of this written program.

Employee Involvement

One of the goals of our program is to enhance employee involvement in the recordkeeping process. We believe that employee involvement is essential to the success of all aspects of safety and health for the company. This is especially true in the area of recordkeeping, because free and frank reporting by employees is the cornerstone of the system. If employees fail to report their injuries and illnesses, the "picture" of the workplace that the OSHA forms reveal will be inaccurate and misleading. This means that our company and our employees will not have the information we need to improve safety and health in the workplace.

Therefore, William Warren Properties involves employees in our program in the following ways:

- Training employees on how to report work-related injuries and illnesses,
- Allowing employees access to report forms (with limitations), and/or
- Posting the annual summary of injuries and illnesses at all company facilities as required by OSHA.

Employee Injury and Illness Reporting System

Employee reports of injuries and illnesses are taken seriously by our company. We use the following method for reporting:

Incidents (Injuries and Illnesses)

All work-related injuries and illnesses are to be reported to the Supervisor immediately or as soon as

practically possible. Failure to report work related injuries and illnesses in a timely manner may result in the denial of benefits under the Workers' Compensation Law.

Upon being advised of the incident, the supervisor on duty at the time of the incident should report immediately to the scene of the occurrence to assure prompt medical attention for the employee(s) involved and address any safety hazards which may have caused or contributed to the incident. In the event the incident occurs outside the employee's work area, the supervisor on duty in the area where the incident occurs should report to the scene immediately.

Serious injury or illness posing a life-threatening situation shall be reported immediately to the local emergency response medical services (Call 911).

Injuries and illnesses shall be reported by the injured employee to his or her supervisor as soon after any life-threatening situation has been addressed. If the injured employee is unable to report immediately, then the incident should be reported as soon as possible.

Upon notification of an occupational injury or illness, the supervisor should notify the Safety Manager, who will then prepare the necessary record keeping forms.

Events

Incidents not involving injury or illness, but resulting in property damage, must also be reported to the involved employee's Supervisor immediately or as soon as practically possible.

In cases of a fire or explosion that cannot be controlled by one person, vehicular accident resulting in injury or more than \$500 worth of damage, or a chemical release requiring a building evacuation, the involved party must immediately report the incident to the emergency response services in the area (911 – police, fire, etc.)

Events, hazardous working conditions or situations, and incidents involving contractor personnel must be reported to Supervisor and/or Safety Manager immediately.

Our reporting system ensures that Safety Manager and/or Supervisor receive the report. The Safety Manager has examined our existing reporting policies and practices to ensure that they encourage and do not discourage reporting and participation in our program. Also, William Warren Properties does not discriminate against employees who file a work-related injury or illness or any other safety and health complaint.

Training

Our employees are expected to understand our occupational injury and illness reporting system, so that reports of work-related injuries and illnesses are received in a timely and systematized manner. Safety Manager will schedule with each district manager training for new employees. The Safety Manager is responsible for training each employee in how and when to report a work-related injury or illness.

Training topics include:

- The company's Injury and Illness Reporting Process,
- What is considered work-related and what is not,

- What is considered OSHA recordable and non-recordable,
- Each employee’s right to access certain records, and
- Posting of the annual summary.

Training is done online in a lecture and discussion format with some written materials provided. All training and information is provided in a language the trainees will understand. The company's training program includes an opportunity for employees to ask questions and receive answers from a physically present and qualified trainer.

The Safety Manager is responsible for keeping records certifying each employee who has successfully completed training. Each certificate includes: trainee name, date of training, and trainer's signature.

Recording Injuries and Illnesses

William Warren Properties keeps records of its employee fatalities, injuries, and illnesses that:

- Is work-related; and
- Is a new case; and
- Meets one or more of the general recording criteria of Sec. 1904.7 or the application to specific cases of Sec. 1904.8 through Sec. 1904.12.

Each recordable injury or illness is entered on OSHA 300 Log of Work-Related Injuries and Illnesses, OSHA 301Form Injury and Illness Incident Report, and a separate, confidential list of privacy-concern cases, if any, within (7) calendar days of receiving information that a recordable injury or illness has occurred. The Safety Manager keeps these records up to date.

If there is a privacy-concern case, we have the option to not enter the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses. Instead, the text “Privacy Case” is entered in the space normally used for the employee's name. This will protect the privacy of the injured or ill employee when another employee, a former employee, or an authorized employee representative is provided access to the OSHA 300 Log under Sec. 1904.35(b)(2). The company will keep a separate, confidential list of the case numbers and employee names for your privacy concern cases so that we can update the cases and provide the information to the government if asked to do so.

Annual Summary

At the end of each calendar year, Safety Manager performs the following steps:

1. Reviews OSHA 300 Log of Work-Related Injuries and Illnesses to verify that the entries are complete and accurate,
2. Corrects any deficiencies identified in the entries,
3. Creates an annual summary of injuries and illnesses recorded on OSHA 300 Log of Work-Related Injuries and Illnesses,
4. Ensures that the company certifies that it reasonably believes, based on knowledge of the process by which the information was recorded, that the annual summary is correct and complete, and
5. Posts OSHA 300-A Summary of Work-Related Injuries and Illnesses at each facility from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

Employee Access to Report Forms

All employees, former employees, their personal representatives, and their authorized employee representatives have a right to access our regulatory-required injury and illness records, with the following limitations:

- We are allowed to give the requester a copy of OSHA 300 Log of Work-Related Injuries and Illnesses by the end of the next business day.
- We may choose to not record the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses in order to protect the privacy of injured and ill employees in certain privacy-concern cases.
- We are allowed to give an employee, former employee, or personal representative a copy of OSHA 301 Form Injury and Illness Incident Report by End of the next business day. A personal representative is:
 - Any person that the employee or former employee designates as such, in writing; or
 - The legal representative of a deceased or legally incapacitated employee or former employee.
- We are allowed to give authorized employee representatives under a collective bargaining agreement a copy of OSHA 301 Form Injury and Illness Incident Report within seven (7) calendar days. An authorized employee representative is an authorized collective bargaining agent of employees. The authorized employee representative will be provided the OSHA 301 Incident Report section titled 'Tell us about the case.' The company will remove all other information from the copy of the OSHA 301 Incident Report or the equivalent substitute form that is given to the authorized employee representative. While the first copy is free, we may charge a reasonable amount for retrieving and copying additional copies.
- Employees also have access to OSHA 300-A Summary of Work-Related Injuries and Illnesses, which is posted from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

William Warren Properties does not discriminate against employees who request access to any records required by OSHA 29 CFR 1904 or otherwise exercise any rights afforded by the OSH Act.

Record Retention

The Safety Manager will save the following records for (5) years following the end of the calendar year that these records cover:

- OSHA 300 Log, the privacy case list (if one exists),
- the annual summary, and
- the OSHA 301 Incident Report forms.

During the storage period, The Safety Manager updates OSHA 300 Log of Work-Related Injuries and Illnesses to include any newly discovered recordable injuries or illnesses and any changes that have occurred in the classification of previously recorded injuries and illnesses. If our company changes ownership Safety Manager is responsible for transferring the OSHA 29 CFR 1904 records to the new owner.

Variations

If our company wishes to keep records in a different manner from that prescribed by OSHA 29 CFR 1904, we may submit a variance petition to the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, Washington, DC 20210. Alternative recordkeeping systems can be approved for a variance if they collect the same information, meet the OSH Act, and do not interfere with administration of the Act. See OSHA 29 CFR 1904 for instructions in how to obtain a variance.

Reporting Fatalities and Hospitalizations

Within eight (8) hours after the death of any employee from a work-related incident or the inpatient hospitalization of three (3) or more employees as a result of a work-related incident the Safety Manager is responsible for orally reporting the fatality and/or multiple hospitalization by telephone or in person to OSHA's Regional Office:

OSHA toll-free central telephone number: 1-800-321-OSHA (1-800-321-6742)

The Safety Manager will provide the agency the following information:

- The establishment name;
- The location of the incident;
- The time of the incident;
- The number of fatalities or hospitalized employees;
- The names of any injured employees;
- Your contact person and his or her phone number; and
- A brief description of the incident.

Fatalities or multiple hospitalization incidents resulting from a motor vehicle accident or on a commercial or public transportation system do not require reporting. However, these injuries must be recorded on our injury and illness records if required.

Other Reporting

When an authorized government representative asks for the records we keep under OSHA 29 CFR 1904, Safety Manager provides copies of the records promptly.

If we receive OSHA's annual survey form, the Safety Manager fills it out and sends it to OSHA or OSHA's designee, as stated on the survey form, within 30 calendar days, or by the date stated in the survey form, whichever is later. If our company receives a Survey of Occupational Injuries and Illnesses Form from the Bureau of Labor Statistics (BLS), or a BLS designee, the Safety Manager promptly completes the form and returns it following the instructions contained on the survey form.

Workers' Compensation Fraud

William Warren Properties is committed to every employee who receives a legitimate, work-related injury or illness. However, if an employee attempt to file a fraudulent work comp claim for injury is suspected it will be turned over to the company's Workers' Compensation insurer and the state's Attorney General's Office for investigation. Workers' Compensation fraud is a serious crime and will be prosecuted to the fullest extent of the law. Fraud results in high Workers' Compensation insurance premiums and productivity interruption affecting the company's ability to remain competitive in the marketplace. This in turn affects all employee's job security and wages. All employees are encouraged to immediately report any suspected fraud to his/her supervisor. Complete confidentiality will be maintained.

Accident Reporting and Investigation Plan

Purpose

This is William Warren Properties Accident Reporting and Investigation Plan prescribes methods and practices for reporting and investigating accidents. No matter how conscientious the safety effort at a company, accidents happen occasionally due to human or system error. Therefore, this written plan is intended to provide a means to deal with all workplace accidents in a standardized way and demonstrate our company's compliance with the reporting requirements of 29 CFR 1904. In addition, it is the policy of the company to comply with all workers' compensation laws and regulations.

Administrative Duties

The Safety Manager is responsible for developing and maintaining this written Accident Reporting and Investigation Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. The Safety Manager is also qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer or oversee our Accident Reporting and Investigation Plan and conduct investigations.

This written Accident Reporting and Investigation Plan is kept at the following location: Safety Manager's office.

Accident Reporting Procedures

Our accident reporting procedures include the following:

1. Employees injured on the job are to report the injury to their supervisor immediately (if possible) or as soon as possible after an incident/accident. "Near miss" accidents or incident should be reported as well, i.e., when an employee nearly has an accident but is able to avoid an injury or illness.
2. The supervisor is then to immediately notify Safety Manager; complete the company Accident Report Form (see the Appendices for a sample form) with the employee, any witnesses, and/or other relevant people; and send a copy of the written Accident Report Form to the Safety Manager as soon as possible after the accident.
3. Any employee witnessing an accident at work is to call for emergency help or whatever assistance appears to be necessary. In addition, the employee is immediately to report the accident to the area supervisor and take part in answering questions related to the Accident Report Form and Accident Investigation Form.

A sample Accident Report Form is provided in the appendix.

Accident Investigation Procedures

Thorough accident investigations will help the company determine why accidents occur, where they happen, and any trends that might be developing. Such identification is critical to preventing and controlling hazards and potential accidents. For all accident investigations, Safety Manager, Safety Team and Employee Supervisor will perform the following duties:

1. Conducts the accident investigation at the scene of the injury as soon after the injury as safely possible.
2. Asks the employee involved in the accident and any witnesses, in separate interviews, to tell him/her in their own words exactly what happened. He/She does not interrupt or ask for more details at that time; he/she just lets the employee describe it in his/her own style.
3. Repeats the employee's version of the event back to the employee or witness and allows him/her to make any corrections or additions.
4. After the employee or witness has given his/her description of the event, asks appropriate questions that focus on causes.
5. Reminds the employee that the investigation was to determine the cause and possible corrective action that can eliminate the cause(s) of the accident.
6. Completes section "A" of the attached Accident Investigation Form with the employee, and reviews the data with the employee for accuracy.
7. Uses the Accident Investigation Form for:
 - Tracking and reporting injuries on a monthly basis;
 - Grouping injuries by type, cause, body part affected, time of day, and process involved;
 - Determining if any trends in injury occurrence exist and graphing those trends if possible;
 - Identifying any equipment, materials, or environmental factors that seem to be commonly involved in injury incidents;
 - Discussing with the safety team and superiors the possible solutions to the problems identified;
 - Proceeding with improvements to reduce the likelihood of future injuries.

A sample Accident Investigation Form is provided in the appendix.

Injury, Illness, and Medical Issues

We also follow these procedures:

1. If a workplace accident results in an injury or illness requiring hospitalization of three or more employees or a fatality of one or more employee the incident by phone or in person to the nearest OSHA office as soon as possible.
2. If an injured person is taken to a doctor, the doctor's statement is attached to the Accident Report Form.
3. If the injury or illness is "recordable" according to OSHA regulation, 29 CFR 1904, then the Safety Manager enters each recordable injury or illness on the OSHA 300 Log, OSHA 301 Incident Report, and a separate, confidential list of privacy-concern cases, if any, within 7 calendar days of receiving information that a recordable injury or illness has occurred.
4. Employees with workplace injuries resulting in time off work shall be put in the company's Return-to-Work Program to facilitate their full recovery and resumption of original work.
5. Weekly compensation for workplace injuries or illnesses requiring time off work, as indicated by law, applies after the third day of wage loss.
6. On the day of the injury, the company will cover the time loss due to doctor and/or emergency room visits or inability to work, up to a maximum of four hours.
7. Any time an associate is away from work because of an accident on-the-job, it should be recorded on the time sheet under Accident On Duty.

Recordkeeping

The Safety Manager is responsible for maintaining the following records and documentation:

- Accident Report Forms.
- Accident Investigation Forms.
- OSHA 200 Forms, Log of Occupational Injuries and Illnesses. Prior to and including the year 2001, injuries and illnesses at the company are recorded on this form no later than six working days after receiving information that a recordable injury or illness has occurred.
- OSHA 101 Forms, Supplemental Record of Occupational Injuries and Illnesses. Prior to and including the year 2001, this form is completed at each establishment within six working days after receiving information that a recordable case has occurred. The form is available for inspection.
- OSHA 102 Forms, Summary of Occupational Injuries and Illnesses. Prior to and including the year 2001, injuries and illnesses at the company are recorded on this form no later than six working days after receiving information that a recordable injury or illness has occurred. This form is posted no later than February 1 following the year covered by the form, and shall remain in place until March 1.
- OSHA 300 Forms, Log of Work-Related Injuries and Illnesses. Starting January 1, 2002, injuries and illnesses at the company are recorded on this form within seven calendar days of receiving information that a recordable injury or illness has occurred.
- OSHA 301 Forms, Injury and Illness Incident Report. Starting January 1, 2001, injuries and illnesses at the company are recorded on this form within seven calendar days of receiving information that a recordable injury or illness has occurred.
- OSHA 300-A Form, Summary of Work-Related Injuries and Illnesses. This form is completed by the end of the year, posted no later than February 1 of the year following the year covered by the form (the first one posted in the year 2003), and kept posted in place until April 30.
- Training records.
- Other forms including equivalent injury and illness recording forms.

Annual Summary Posting

At the end of each calendar year, Safety Manager performs the following steps:

1. Reviews the OSHA 300 Form to verify that the entries are complete and accurate,
2. Corrects any deficiencies identified in the entries,
3. Creates OSHA 300-A, an annual summary of injuries and illnesses recorded on the OSHA 300 Form,
4. Ensures that a company executive certifies that he/she reasonably believes, based on his/her knowledge of the process by which the information was recorded, that the annual summary is correct and complete, and
5. Posts OSHA 300-A on the office bulletin board from February 1 through April 30 of the year following the year covered by the form.

Note: The 2001 summary (summary portion of OSHA 200 Log) must only be posted from February 1 to March 1, 2002.

Employee Involvement and Training

This plan is an internal document guiding the action and behaviors of employees, so they need to know about it. At the time of their hire the Human Resources Department or their supervisor thoroughly explains to all employees why the Accident Reporting and Investigation Plan was prepared and how employees may be affected by it. Employees are informed in how to report an injury or illness.

Employees, and their representatives, are also provided limited access to our injury and illness records. Copies of relevant OSHA 300 Log are provided by the next business day to all employees, former employees, and representatives that request them. Employees, former employees, and personal representatives who request OSHA 301 Injury & Illness Incident Report will also receive them by the end of the next business day. However, authorized employee representatives will only receive requested OSHA 301 Injury & Illness Incident Report within seven calendar days, and all sections of the OSHA 301 Injury & Illness Incident Report will be removed except the 'Tell us about the case.' section. All initial copies are provided to requestors free of charge. Additional copies involve a reasonable charge.

Our company does not discriminate against employees for:

- Reporting a work-related fatality, injury, or illness;
- Filing a safety and health complaint;
- Asking for access to occupational injury and illness records; or
- Exercising any rights afforded by the Occupational Safety and Health Act.

Program Evaluation

The Accident Reporting and Investigation Plan is evaluated and updated by the Safety Manager annually to determine whether the plan is being followed and if further training may be necessary.

Appendix

We have attached the following appendices to ensure better understanding of this plan:

- Accident report forms;
- Employee Report of Accident, Injury or Illness
- Supervisor's Report of Accident
- Safety Accident Investigation Report

Safety & Accident Investigations

Purpose

Accident prevention and control of hazards is the result of a well-designed and executed safety and health program. One of the keys to a successful program includes collaboration between management and general labor personnel. Two of the most critical functions of a well-designed, trained safety culture are safety audits and accident investigations. The basic purpose of audits and investigations is to determine measures that can be taken to prevent accidents in the future. William Warren Properties is committed to accident prevention in the workplace.

Policy

A company safety circle has been established composed of the following personnel: Bill Hobin, Gary Sugarman, Kellen Kalso, Traci Young and McKenna Wilson. New employees are encouraged to provide their enthusiasm and new perspectives on safety in the workplace. The company safety circle has four primary functions and they are as follows:

1. Assisting in the enforcement of company safety policies.
2. Investigating employee safety complaints.
3. Conducting periodic safety audits of their assigned area(s).
4. Ensuring prompt, unbiased, and accurate accident investigations.

The safety circle meets on an annual basis to discuss current safety issues and to review safety inspections and audits of the job site(s).

Safety Inspections & Audits

Inspection of job sites and audits of safety programs are tools that can be used to identify problems and hazards before these conditions result in accidents or injuries. Audits also help to identify the effectiveness of safety program management and can be used as a guide to assure regulatory compliance and a safe workplace.

Types of Inspections

- **Management Daily Walk-through:** This is an undocumented inspection that is made daily prior to startup and shift change to ensure the job site and equipment are in safe conditions for Employees. All noted unsafe areas are placed in a safe condition prior to Employees working in the area. This is conducted by the manager on duty at the property.
- **Safety Inspection:** Quarterly a District Manager will tour the job site(s). This tour is to ensure Managers are familiar with all areas of the operation. Record of problem areas, recommendations and deficiencies will be recorded and provided to management.
- **Equipment Inspections:** These are conducted on a routine basis to ensure specific safety equipment is in good working order and will function when needed.
- **Program Audits:** are conducted to check the administration of specific safety and health programs. Program Audits shall be conducted annually.

As a minimum, the last two program audits will be kept on record. Routine inspection records will be maintained on a most current basis. Records of deficiency corrections will be maintained for one calendar

year from date of correction.

Accident Investigations

It is the policy of William Warren Properties that all work related accidents, injuries and illnesses are to be conducted in a professional manner to identify probable causes and are used to develop specific management actions for the prevention of future accidents. Every minor or non-disabling injury will be investigated with the same vigor and thoroughness as serious injuries. Proper and complete investigation of these injuries can be an effective injury prevention tool. Human Resources and the District Manager will be responsible for conducting accident investigations.

All accident investigations will be conducted as soon as possible, within 24 hours. All accident investigations will be documented using the attached Accident Investigation Report Form. While conducting accident investigations, particular attention will be given to suggesting ways to prevent future occurrences of the events which caused the accident and corrective action to be taken.

Hazard Communication Program

This Hazard Communication Program has been developed in accordance with the Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.1200. It provides detailed safety guidelines and instructions for receipt, use and storage of chemicals at our facility by employees and contractors.

Administrative Duties

The Safety Manager has overall responsibility for coordinating safety and health programs in this company. He is the person having overall responsibility for the Hazard Communication Program. The Safety Manager will review and update the program, as necessary. Copies of the written program may be obtained in the Safety Manager's office.

General Program Information

This written Hazard Communication Plan (HAZCOM) has been developed based on OSHA's Hazard Communication Standard and consists of the following elements:

- Identification of Hazardous Materials
- Product Warning Labels
- Safety Data Sheets (SDS)
- Written Hazard Communication Program
- Effective Employee Training

Some chemicals are explosive, corrosive, flammable, or toxic. Other chemicals are relatively safe to use and store but may become dangerous when they interact with other substances. To avoid injury and/or property damage, persons who handle chemicals in any area of the Company must understand the hazardous properties of the chemicals. Before using a specific chemical, safe handling methods and health hazards must always be reviewed. Supervisors are responsible for ensuring that the equipment needed to work safely with chemicals is accessible and maintained for all employees on all shifts.

Employee Training

Initial Orientation Training

All new employees shall receive safety orientation training covering the elements of the HAZCOM and Right to Know Program. This training will consist of general training covering:

1. Location and availability of the written Hazard Communication Program
2. Location and availability of the List of Chemicals used in the workplace
3. The specific physical and health hazard of all chemicals in the workplace
4. Specific control measures for protection from physical or health hazards
5. Explanation of the chemical labeling system
6. Location and use of Safety Data Sheets (SDS)

Job Specific Training

Employees will receive on the job training from their supervisor. This training will cover the proper use,

inspection and storage of necessary personal protective equipment and chemical safety training for the specific chemicals they will be using or will be working around.

Annual Refresher Training

Annual Hazard Communication refresher training will be conducted as part of the company's continuing safety training program.

Immediate On-the-Spot Training

This training will be conducted by supervisors for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

Non-Routine Tasks

Non-routine tasks are defined as working on, near, or with unlabeled piping, unlabeled containers of an unknown substance, confined space entry where a hazardous substance may be present and/or a one-time task using a hazardous substance differently than intended (example: using a solvent to remove stains from tile floors).

Steps for Non-Routine Tasks

- Step 1: Hazard Determination
- Step 2: Determine Precautions
- Step 3: Specific Training & Documentation
- Step 4: Perform Task

All non-routine tasks will be evaluated by the Supervisor and Safety Manager before the task commences, to determine all hazards present. This determination will be conducted with quantitative/qualitative analysis (air sampling, substance identification/analysis, etc., as applicable).

Once the hazard determination is made, the Department Supervisor and Safety Department will determine the necessary precautions needed to either remove the hazard, change to a non-hazard, or protect from the hazard (use of personal protective equipment) to safeguard the Employees present. In addition, the Department Supervisor or Safety Department will provide specific safety training for Employees present or affected and will document the training.

Off-Site Use or Transportation of Chemicals

SDS will be provided to employees for each chemical and each occurrence of use or transport away from the company facilities. All State and Federal DOT Regulations will be followed including use of certified containers, labeling & marking, securing of containers and employee training.

General Chemical Safety

Assume All Chemicals Are Hazardous

The number of hazardous chemicals and the number of reactions between them is so large that prior

knowledge of all potential hazards cannot be assumed. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects.

General Safety Rules

- Read and understand the Safety Data Sheets.
- Keep the work area clean and orderly.
- Use the necessary safety equipment.
- Carefully label every container with the identity of its contents and appropriate hazard warnings.
- Store incompatible chemicals in separate areas.
- Substitute less toxic materials whenever possible.
- Limit the volume of volatile or flammable material to the minimum needed for short operation periods.
- Provide means of containing the material if equipment or containers should break or spill their contents.

Task Evaluation

Each task that requires the use of chemicals should be evaluated to determine the potential hazards associated with the work. This hazard evaluation must include the chemical or combination of chemicals that will be used in the work, as well as other materials that will be used near the work. If a malfunction during the operation has the potential to cause serious injury or property damage, a Safe Operational Procedure (SOP) should be prepared and followed. Operations must be planned to minimize the generation of hazardous wastes.

Chemical Storage

The separation of chemicals (solids or liquids) during storage is necessary to reduce the possibility of unwanted chemical reactions caused by accidental mixing. Explosives should be stored separately outdoors. Use either distance or barriers (e.g., trays) to isolate chemicals into the following groups:

- Flammable Liquids: store in approved flammable storage lockers.
- Acids: treat as flammable liquids
- Bases: do not store bases with acids or any other material
- Other liquids: ensure other liquids are not incompatible with any other chemical in the same storage location.
- Lips, strips, or bars are to be installed across the width of storage shelves to restrain the chemicals in case of earthquake.

Chemicals will not be stored in the same refrigerator used for food storage. Refrigerators used for storing chemicals must be appropriately identified by a label on the door.

Container Labels

It is extremely important that all containers of chemicals are properly labeled. This includes every type of container from a 5000-gallon storage tank to a spray bottle of degreaser. The following requirements apply:

- All containers will have the appropriate label, tag or marking prominently displayed that

- indicates the identity, safety and health hazards.
- Portable containers which contain a small amount of chemical need not be labeled if they are used immediately that shift, but must be under the strict control of the employee using the product.
 - All warning labels, tags, etc., must be maintained in a legible condition and not be defaced. Facility weekly supervisor inspections will check for compliance of this rule.
 - Incoming chemicals are to be checked for proper labeling.

Emergencies and Spills

In case of an emergency, implement the proper Emergency Action & Response Plan.

1. Evacuate people from the area.
2. Isolate the area.
3. If the material is flammable, turn off ignition and heat sources.
4. Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures beyond those required to evacuate the area.
5. Call for Emergency Response Team assistance if required.

Housekeeping

- Maintain the smallest possible inventory of chemicals to meet immediate needs.
- Periodically review stock of chemicals on hand.
- Ensure that storage areas, or equipment containing large quantities of chemicals, are secure from accidental spills.
- Rinse emptied bottles that contain acids or inflammable solvents before disposal.
- Recycle unused laboratory chemicals wherever possible.

DO NOT Place hazardous chemicals in salvage or garbage receptacles.

DO NOT Pour chemicals onto the ground.

DO NOT Dispose of chemicals through the storm drain system.

DO NOT Dispose of highly toxic, malodorous chemicals down sinks or sewer drains.

Contractors

All outside contractors working inside Company Facilities are required to follow the requirements of this program. The Company will provide Contractors information concerning:

- Location of SDS
- Precautions to be taken to protect contractor employees
- Potential exposure to hazardous substances
- Chemicals used in or stored in areas where they will be working
- Location and availability of Safety Data Sheets
- Recommended Personal Protective Equipment
- Labeling system for chemicals

Safety Data Sheets (SDS) Information

Safety Data Sheets are provided by the chemical manufacturer to provide additional information

concerning safe use of the product. Each SDS provides:

- Common Name and Chemical Name of the material
- Name, address and phone number of the manufacturer
- Emergency phone numbers for immediate hazard information
- Date the SDS was last updated
- Listing of hazardous ingredients
- Chemical hazards of the material
- Information for identification of chemical and physical properties

Information Chemical Users must know

Fire and/or Explosion Information

- Material Flash Point, auto-ignition temperature and upper/lower flammability limits
- Proper fire extinguishing agents to be used
- Fire fighting techniques
- Any unusual fire or explosive hazards

Chemical Reaction Information

- Stability of Chemical
- Conditions and other materials which can cause reactions with the chemical
- Dangerous substances that can be produced when the chemical reacts

Control Measures

- Engineering Controls required for safe product use
- Personal protective equipment required for use of product
- Safe storage requirements and guidelines
- Safe handling procedures

Health Hazards

- Permissible Exposure Limit (PEL) and Threshold Limit Value (TLV)
- Acute or Chronic symptoms of exposure
- Main routes of entry into the body
- Medical conditions that can be made worse by exposure
- Cancer causing properties if any
- Emergency and First Aid treatments

Spill & Leak Procedures

- Clean up techniques
- Personal Protective Equipment to be used during cleanup
- Disposal of waste & cleanup material

Employee Use of Safety Data Sheets (SDS)

For SDS use to be effective, employees must:

- Know the location of the SDS
- Understand the major points for each chemical
- Check SDS when more information is needed or questions arise
- Be able to quickly locate the emergency information on the SDS
- Follow the safety practices provided on the SDS

Responsibilities

Management

- Ensure compliance with this program
- Conduct immediate corrective action for deficiencies found in the program
- Maintain an effective Hazard Communication training program
- Make this plan available to employees or their designated representative
- Shipping & Receiving Manager
- Ensure all received containers are properly labeled and that labels are not removed or defaced
- Ensure all shipped containers are properly labeled
- Ensure shipping department employees are properly trained in spill response
- Ensure received (SDS) are properly distributed

Safety Manager

- Maintain a list of hazardous chemicals using the identity that is referenced on the SDS
- Monitor the effectiveness of the program
- Conduct annual audit of the program
- Monitor employee training to ensure effectiveness
- Keep management informed of necessary changes
- Ensure SDSs are available as required
- Monitor facility for proper use, storage and labeling of chemicals
- Ensure SDS are available for emergency medical personnel when treating exposed employees
- Provide information, as requested, concerning health effects and exposure symptoms listed on MDSs

Supervisors

- Comply with all specific requirements of the program
- Provide specific chemical safety training for assigned employees
- Ensure chemicals are properly used stored & labeled
- Ensure only the minimum amount necessary is kept at work stations
- Ensure up to date MSDS are readily accessible to all employees on all shifts

Employees

- Comply with chemical safety requirements of this program
- Report any problems with storage or use of chemicals
- Immediately report spills of suspected spills of chemicals
- Use only those chemicals for which they have been trained
- Use chemicals only for specific assigned tasks in the proper manner

Contractors

- Comply will all aspects of this program
- Coordinate information with the Safety Manager
- Ensure Contractor employees are properly trained
- Notify the Safety Manager before bringing any chemicals into company property or facilities
- Monitor and ensure proper storage and use of chemicals by Contractor employees.

Electrical Safety & Ground Fault Protection Plan

Purpose

The Electrical Safety program is designed to prevent electrically related injuries and property damage. This program also provides for proper training of maintenance employees to ensure they have the requisite knowledge and understanding of electrical work practices and procedures.

All employees are not qualified to conduct adjustment, repair or replacement of electrical components or equipment.

All repairs are maintained by a qualified third-party vendor. Electricity has long been recognized as a serious workplace hazard, exposing employees to such dangers as electric shock, electrocution, fires and explosions.

Administrative Duties

We have designated the following competent person(s) to implement the program: Safety Manager. The competent person(s) are responsible for developing and maintaining this written Electrical Safety Plan.

They are qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer and oversee our electrical safety plan and conduct the required evaluations of plan effectiveness.

Electrical Equipment

Examination

Electrical equipment shall be free from recognized hazards that are likely to cause death or serious physical harm to employees. Safety of equipment shall be determined using the following considerations:

- Suitability for installation and use in conformity with the provisions of this subpart. Suitability of equipment for an identified purpose may be evidenced by listing or labeling for that identified purpose.
- Mechanical strength and durability, including, for parts designed to enclose and protect other equipment, the adequacy of the protection thus provided.
- Electrical insulation.
- Heating effects under conditions of use.
- Arcing effects.
- Classification by type, size, voltage, current capacity, and specific use.
- Other factors which contribute to the practical safeguarding of employees using or likely to come in contact with the equipment.

Recordkeeping

The Safety Manager is responsible for maintaining these records.

Personal Protective Equipment

Employees working in areas where the potential contact with exposed electrical sources are present and likely, will be provided and shall use Personal Protective Equipment (PPE). The following rules apply to the use and care of PPEs:

- PPE shall be used where contact with exposed electrical sources are present and likely.
- PPE shall be designed for the work being performed and environment in which it is used.
- PPE shall be visually inspected and/or tested before use. Any defects or damage shall be replaced, repaired or discarded.
- In cases where the insulating capabilities of the PPEs may be damaged during the work, a protective outer cover, such as leather, must be used.

Employee shall wear protective eye/face equipment whenever there is a danger from electrical arcs or flashes or from flying objects resulting from an electrical explosion.

Working at Elevated Locations

Any person working on electrical equipment elevated must take necessary precautions to prevent a fall from reaction to electrical shock or other causes. A second person, knowledgeable as a safety watch, must assume the best possible position to assist the worker in case of an accident. Portable ladders shall have non-conductive side rails if they are used where the employee or the ladder could contact exposed energized parts.

Powered Equipment Safety Rules

Electrical equipment is defined as cord or plug-type electrical devices which includes the use of flexible or extension cords. Examples of portable electrical equipment included powered hand tools, powered bench tools, fans, radios, etc. The following safety rules apply to portable electrical equipment (PEE):

- PEE shall be handled in such a manner as to not cause damage. Power cords may not be stapled or otherwise hung in a way that may cause damage to the outer jacket or insulation.
- PEE shall be visually inspected for damage, wear, cracked or spilt outer jackets or insulation, etc., before use or before each shift. PEE that remain connected once put in place need not be inspected until relocated. Any defects; such as cracked or split outer jackets or insulation must be repaired, replaced or placed out of service.
- Always check the compatibility of cord sets and receptacles for proper use.
- Ground type cord sets may only be used with ground type receptacles when used with equipment requiring a ground type conductor.
- Attachment plugs and receptacle may not be altered or connected in a way that would prevent the proper continuity of the equipment grounding conductor. Adapters may not be used if they interrupt the continuity of the grounding conductor.
- Only portable electrical equipment that is double insulated or designed for use in areas that are wet or likely to contact conductive liquids may be used.
- Employees that are wet or have wet hands may not handle PEEs (plug-in, un-plug, etc.). Personal protective equipment must be used when handling PEEs that are wet or covered with a conductive liquid.
- Locking-type connectors shall be properly secured after connection to a power source.

Electrical Lockout Tagout Requirements

Lockout is the preferred method of isolating machines or equipment from energy sources. Tagout is to be performed instead of lockout only when there is no way to lockout a machine.

All equipment shall be locked out or tagged out to protect against accidental or inadvertent operations when such operations could cause injury to personnel.

All electrical equipment (e.g. drills to cut locks) must be tagged out when maintenance is required. The drill should be immediately unplugged from the electrical source prior to tagging the equipment out. The supervisor must be notified that maintenance is required. The supervisor will determine if maintenance will be conducted or the equipment permanently removed from service, disposed of and replaced.

No WWP employee should provide maintenance on any electrical equipment.

Because people may be moved from one work area to another, it would not be appropriate or practical to generate a list of people identified with a particular area. Therefore, the person who initiates, or terminates, a lockout or tagout procedure will notify those persons in the affected area.

Training

Training is provided to ensure that employees are familiar with the requirements of this plan. This training is provided to employees at the time of hire and annually thereafter.

Safety Manager is responsible for conducting training.

- The training program addresses the required written elements for electrical safety for: Lockout and tagging procedures to be used when working on exposed de-energized parts.

Training for Non-Qualified Employees

Training for Non-Qualified Employees is general electrical safety precautions to provide an awareness and understanding of electrical hazards.

Electrical Safety Rules for Non-Qualified Workers

1. Do not conduct any repairs to electrical equipment
2. Report all electrical deficiencies to your supervisor
3. Do not operate equipment if you suspect an electrical
4. problem
5. Water and electricity do not mix.
6. Even low voltages can kill or injure you
7. Do not use cords or plugs if the ground prong is missing
8. Do not overload electrical receptacles

Program Evaluation

The Electrical Safety Plan is evaluated and updated as necessary by the Safety Manager to ensure the

continued effectiveness of the program.

Machinery & Machine Guarding Safety

Purpose

It is the policy of William Warren Properties to permit only trained and authorized employees to operate machinery, tools, or equipment at any time. This policy is applicable to:

- daily operators of machinery, tools, and equipment; and
- those who only occasionally have cause to use machinery, tools, or equipment.
- Examples of equipment or tools used by William Warren Properties employees are drills for cutting locks on storage units, vacuum and a power washer.

This written Machine/Equipment Safety and Guarding Plan describes methods and practices for care and use of machines, equipment, and tools that can be read and understood by all managers, supervisors, and employees at William Warren Properties. This written plan is intended to be used to:

- create an awareness of the hazards among our workforce,
- standardize procedures for use and care of the equipment,
- provide a consistent format for training employees on the proper procedures to be used,
- minimize the possibility of injury or harm to our employees, and
- demonstrate William Warren Properties compliance with machine safety and equipment usage requirements for general industry in Subpart O and P of 29 CFR 1910.

Administrative Duties

The Safety Manager is responsible for developing and maintaining this written Machine/Equipment Safety and Guarding Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. The Safety Manager is also qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer or oversee our machine/equipment safety program and conduct the required evaluations.

This written Machine/Equipment Safety and Guarding Plan is kept in the Safety Manager's office.

If, after reading this plan, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to creating a safe workplace for all our employees, and a safe and effective machine/equipment safety and guarding program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

Policy

All mechanical motion is potentially hazardous. Motion hazards, such as rotating devices, cutting or shearing blades, in-running nip points, reciprocating parts, linear moving belts and pulleys, meshing gears, and uncontrolled movement of failing parts, are examples of motion and peculiar to any one machine or job operation. Employees working within areas where they are exposed to machinery or equipment hazards must be aware of the potential for accidents. Machine operators and others are exposed to moving parts and can get clothing or body parts caught in the machinery.

Training

Employees will be trained to:

- Safely operate each machine they will be required to use
- To recognize potential accident producing situations, and
- To know what to do when hazards are discovered.

Only employees who have been thoroughly trained, or those who are undergoing supervised on-the-job training on the equipment, will be permitted to operate machinery.

Personal Protective Equipment

- Eye protection or face shields will be worn by all employees within areas where machines are operated.
- Loose fitting clothing, rings, bracelets, or other apparel that may become entangled in moving machinery will not be worn by machine operators or their helpers.
- Hair nets or caps will be worn to keep long hair away from moving machinery.
- Gloves will not be worn where there is a chance of them being caught in machinery.
- Ear plugs or muffs will be used when required for worker protection.
- The Safety Manager should be contacted to assist Supervisors in determining employee's protective equipment needs.

Environmental

Machines designed for fixed locations will normally be securely fastened to the floor or other suitable foundation to eliminate all movement or "walking." Machines equipped with rubber feet, non-skid foot pads, or similar vibration dampening materials will be installed according to the manufacturer's recommendations.

Machines that have the potential of tipping or falling over will be firmly secured.

Machines that develop fine dust and fumes will be equipped with effective exhaust hoods, connected to an effective exhaust system. An interlocking device should be installed to link the machine's power supply and the exhaust system to prevent the operation of machines without the exhaust system operating.

Machines will never be left unattended with the power on unless the worker is operating more than one machine in a battery of machines. In this latter instance, the clear zone will be appropriately marked to include all machines in the group.

No attempt will be made to clean any part of a machine until the moving parts have come to a complete stop. Chips will not be removed from machinery by hand. Hand brushes should be used but compressed air may be used when reduced to less than 30 psi and then only with effective chip guarding and personal protective equipment.

Brushes, swabs, lubricating rolls, and automatic or manual pressure guns will be used by operators to lubricate material, punches, or dies. This equipment will be used so that operators are not required to reach into the point of operation or other hazardous area.

Housekeeping

Floors will be kept in good repair and free of chips, dust, metal scraps, and other slipping and tripping hazards.

Waste containers will be emptied daily or more often, if necessary, to prevent excessive waste accumulations.

All materials, including usable scrap, will be stored so that they will not present a hazard.

Drip pans will be used whenever equipment must be oiled. Machinery will not be in motion when being lubricated unless lubrication is automatic or a long gravity flow spout is used, enabling the oiler to remain in the clear while performing this task.

Material Handling

Trucks used for scrap disposal will not be overloaded, and scrap will not extend beyond the ends or sides of trucks.

When materials are of a weight or size which makes manual lifting hazardous, the district manager or construction manager should be notified and a contractor will be used to dispose of the materials.

Maintenance and Repair

When maintenance or repair is needed, machines will be completely shut down and the control switch(es) locked and tagged in the "OFF" position.

Cutting tools will be kept sharp and free from accumulations of chips, dust, and other foreign matter.

Damaged cutting tools will be removed from service and will not be used until repaired.

Machine Usage

Machines will be used only for work within the rated capacity specified by the machine manufacturer.

Machines will be maintained so that while running at full or idle speed, with the largest cutting tool attached, they are free of excessive vibration.

Machines will be completely stopped before attempting to clear jammed work or debris.

Electrical Safeguards

The motor "START" button will be protected against accidental/inadvertent operation. "START" buttons will not be wedged for continuous operation.

The wiring and grounding of machinery will be in accordance with the National Electric Code.

Each machine will have a positive electrical disconnect or isolation switch which can be locked out.

Electrically driven machines will be equipped with under voltage protective systems to preclude automatic restart after either a power failure or other under voltage condition.

Machine Controls

Controls will be available to the workers at their operating positions so that they do not reach over moving parts of the equipment. Control functions will be identified by printed words and color coding.

Power controls must have a way of locking out electrical power.

Training Program

Under no circumstances will an employee operate a piece of machinery or equipment until he/she has successfully completed this company's machinery and equipment training program. This includes all new operators or users of machinery and equipment, regardless of claimed previous experience.

The company training program usually includes supervised on-the-job training unless operation a piece of equipment requires specialized train and/or has specific training requirements under other OSHA standards. Training will be conducted for each specific piece of machinery and equipment to be utilized by the employee in the assigned work area.

The Human Resources Department will identify all new employees in the employee Orientation Program and schedule training with their Supervisor.

Operational training consists of:

- Pre-operational procedures.
- Basic maintenance for machinery and equipment.
- Operational review of each piece of machinery, tool, or equipment the employee is expected to operate.
- How to safely operate each machine they will be required to use
- How to recognize potential accident producing situations, and
- How to know what to do when hazards are discovered.

Personal Protective Equipment

Purpose

William Warren Properties provides all Employees with required PPE to suit the task and known hazards. This Chapter covers the requirements for Personal Protective Equipment with the exception of PPE used for hearing conservation and respiratory protection or PPE required for hazardous material response to spills or releases, which if applicable are covered under separate programs.

The Safety Manager is the program coordinator, who has overall responsibility for the program. The Safety Manager will designate appropriate supervisors to assist in training employees and monitoring their use of PPE. This written plan is kept in the Safety Manager's office. Then he will review and update the program as necessary. Copies of this program may be obtained from the Safety Manager's office.

We at William Warren Properties believe it is our obligation to provide a hazard free environment to our employees. Any employee encountering hazardous conditions must be protected against the potential hazards. The purpose of protective clothing and equipment (PPE) is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present in the workplace. (See separate documents for respiratory protection and hearing conservation programs.)

Establishing an overall written PPE program detailing how employees use PPE makes it easier to ensure that they use PPE properly in the workplace and document our PPE efforts in the event of an OSHA inspection. William Warren Properties PPE program covers:

- Purpose
- Hazard assessment
- PPE selection
- Employee training
- Cleaning and maintenance of PPE
- PPE specific information

If after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of our Personal Protective Equipment Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

General Policy

Engineering controls shall be the primary methods used to eliminate or minimize hazard exposure in the workplace. When such controls are not practical or applicable, personal protective equipment shall be employed to reduce or eliminate personnel exposure to hazards. Personal protective equipment (PPE) will be provided, used, and maintained when it has been determined that its use is required and that such use will lessen the likelihood of occupational injuries and/or illnesses.

Responsibilities

The Safety Manager will be responsible for assessing the hazards and exposures that may require the use of PPE, determining the type of equipment to be provided, and purchasing the equipment. Input from managers, supervisors, and employees will be obtained and considered in selecting appropriate equipment.

Managers/supervisors will be responsible for training employees in the use and proper care of PPE, ensuring that all employees are assigned appropriate PPE, and ensuring that PPE is worn by employees when and where it is required.

Employees are responsible for following all provisions of this program and related procedures. They are expected to wear PPE when and where it is required.

Hazard Assessment

The Company will perform an assessment of the workplace to determine if hazards are present, or likely to be present, which necessitate the use of personal protective equipment (PPE). This assessment will consist of a survey of the workplace to identify sources of hazards to workers. Consideration will be given to hazards such as impact, penetration, laceration, compression (dropping heavy objects on foot, roll-over, etc.), chemical exposures, harmful dust, heat, light (optical) radiation, electrical hazards, noise, etc. If such hazards are identified, the following will be done.

- Select and have each affected employee use the proper PPE.
- Explain selection decisions to each affected employee.
- Select PPE that properly fits each affected employee.

Defective & Damaged Equipment

Defective or damaged personal protective equipment shall not be used.

Training

All Employees who are required to use PPE shall be trained to know at least the following:

- When PPE is necessary;
- What PPE is necessary;
- How to properly don, remove, adjust, and wear PPE;
- The limitations of the PPE
- The proper care, maintenance, useful life and disposal of the PPE.

Each affected Employee shall demonstrate an understanding of the training and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

Certification of training for PPE is required by OSHA and shall be accomplished by using the *Job Safety Checklist* to verify that each affected Employee has received and understood the required PPE training.

PPE Selection

Controlling hazards.

PPE devices alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

Selection guidelines

The general procedure for selection of protective equipment is to:

- become familiar with the potential hazards and the type of protective equipment that is available, and what it can do; i.e., splash protection, impact protection, etc.;
- compare the hazards associated with the environment; i.e., impact velocities, masses, projectile shape, radiation intensities, with the capabilities of the available protective equipment;
- select the protective equipment which ensures a level of protection greater than the minimum required to protect employees from the hazards fit the user with the protective device and give instructions on care and use of the PPE.
- It is very important that end users be made aware of all warning labels for and limitations of their PPE.

Fitting the Device

Careful consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected.

Devices with Adjustable Features

Adjustments should be made on an individual basis for a comfortable fit that will maintain the protective device in the proper position. Particular care should be taken in fitting devices for eye protection against dust and chemical splash to ensure that the devices are sealed to the face. In addition, proper fitting of helmets is important to ensure that it will not fall off during work operations. In some cases a chin strap may be necessary to keep the helmet on an employee's head. (Chin straps should break at a reasonably low force, however, so as to prevent a strangulation hazard). Where manufacturer's instructions are available, they should be followed carefully.

Eye & Face Protection

- The majority of occupational eye injuries can be prevented by the use of suitable/approved safety spectacles, goggles, or shields. Approved eye and face protection shall be worn when there is a reasonable possibility of personal injury.
- Each employee shall use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.
- Each employee shall use eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors are acceptable.
- Each employee who wears prescription lenses while engaged in operations that involve eye hazards shall wear eye protection that incorporates the prescription in its design, or shall wear

eye protection that can be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.

- Eye and face PPE shall be distinctly marked to facilitate identification of the manufacturer.
- Each employee shall use equipment with filter lenses that have a shade number appropriate for the work being performed for protection from injurious light radiation.

Typical hazards that can cause eye and face injury are:

- Splashes of toxic or corrosive chemicals;
- Flying objects, such as metal from lock cutting;
- Fumes, gases, and mists of toxic or corrosive chemicals; and
- Aerosols of biological substances.

Prevention of eye accidents requires that all persons who may be in eye hazard areas wear protective eyewear. This includes employees, visitors, contractors, or others passing through an identified eye hazardous area. To provide protection for these personnel, activities shall procure a sufficient quantity of heavy duty goggles and/or plastic eye protectors which afford the maximum amount of protection possible. If these personnel wear personal glasses, they shall be provided with a suitable eye protector to wear over them.

Eye & Face Protection Specs

Eye and face protectors procured, issued to, and used by employees, contractors and visitors must conform to the following design and performance standards:

1. Provide adequate protection against the particular hazards for which they are designed
2. Fit properly and offer the least possible resistance to movement and cause minimal discomfort while in use.
3. Be durable.
4. Be easily cleaned or disinfected for or by the wearer.
5. Be clearly marked to identify the manufacturer.
6. Persons who require corrective lenses for normal vision, and who are required to wear eye protection, must wear goggles or spectacles of one of the following types:
 - Spectacles with protective lenses which provide optical correction.
 - Goggles that can be worn over spectacles without disturbing the adjustment of the spectacles.
 - Goggles that incorporate corrective lenses mounted behind the protective lenses.

Eye & Face PPE Use

Safety Spectacles. Protective eye glasses are made with safety frames, tempered glass or plastic lenses, temples and side shields which provide eye protection from moderate impact and particles encountered in job tasks such as carpentry, woodworking, grinding, scaling, etc.

Single Lens Goggles. Vinyl framed goggles of soft pliable body design provide adequate eye protection from many hazards. These goggles are available with clear or tinted lenses, perforated, port vented, or non-vented frames. Single lens goggles provide similar protection to spectacles and may be worn in combination with spectacles or corrective lenses to insure protection along with proper vision.

Grinders Goggles. These goggles are available in rigid and soft frames to accommodate single or two eye piece lenses.

- Grinders goggles provide eye protection from flying particles. The dual protective eye cups house impact resistant clear lenses with individual cover plates.

Face Shields. These normally consist of an adjustable headgear and face shield of tinted/transparent acetate or polycarbonate materials, or wire screen. Face shields are available in various sizes, tensile strength, impact/heat resistance and light ray filtering capacity. Face shields will be used in operations when the entire face needs protection and should be worn to protect eyes and face against flying particles, metal sparks, and chemical/ biological splash.

<i>Selection chart guidelines for eye and face protection</i>		
The following chart provides general guidance for the proper selection of eye and face protection to protect against hazards associated with the listed hazard "source" operations.		
<i>Source</i>	<i>Hazard</i>	<i>Protection</i>
IMPACT - Chipping, grinding machining, masonry work, woodworking, sawing, drilling, chiseling, powered fastening, riveting, and sanding	Flying fragments, objects, large chips, particles, sand, dirt, etc.	Spectacles with side protection, goggles, face shield For severe exposure, use face shield
CHEMICALS -Acid and chemical handling, degreasing, plating	Splash	Goggles, eyecup and cover types. For severe exposure, use face shield.
DUST - Woodworking, buffing, general, buffing, general dusty conditions.	Nuisance dust	Goggles, eye cup and cover type

Hand Protection

Hand protection is required when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes.

Skin contact is a potential source of exposure to toxic materials; it is important that the proper steps be taken to prevent such contact. Gloves should be selected on the basis of the material being handled, the particular hazard involved, and their suitability for the operation being conducted. One type of glove will not work in all situations.

Most accidents involving hands and arms can be classified under four main hazard categories: chemicals, abrasions, cutting, and heat. There are gloves available that can protect workers from any of these individual hazards or combination of hazards.

Gloves should be replaced periodically, depending on frequency of use and permeability to the substance(s) handled. Gloves overtly contaminated should be rinsed and then carefully removed after use.

Gloves should also be worn whenever it is necessary to handle rough or sharp-edged objects, and very hot or very cold materials. The type of glove materials to be used in these situations include leather, welder's gloves, aluminum-backed gloves, and other types of insulated glove materials.

Careful attention must be given to protecting your hands when working with tools and machinery. Power

tools and machinery must have guards installed or incorporated into their design that prevent the hands from contacting the point of operation, power train, or other moving parts. To protect the hands from injury due to contact with moving parts, it is important to:

- Ensure that guards are always in place and used.
- Always lock out machines or tools and disconnect the power before making repairs.
- Treat a machine without a guard as inoperative; and
- Do not wear gloves around moving machinery, such as drill presses, mills, lathes, and grinders.

Selecting Hand PPE

Selection of hand PPE shall be based on an evaluation of the performance characteristics of the hand protection relative to the task(s) to be performed, conditions present, duration of use, and the hazards and potential hazards identified. Gloves are often relied upon to prevent cuts, abrasions, burns, and skin contact with chemicals that are capable of causing local or systemic effects following dermal exposure. There is no glove that provides protection against all potential hand hazards, and commonly available glove materials provide only limited protection against many chemicals. Therefore, it is important to select the most appropriate glove for a particular application and to determine how long it can be worn, and whether it can be reused. It is also important to know the performance characteristics of gloves relative to the specific hazard anticipated; e.g., chemical hazards, cut hazards, flame hazards, etc. Before purchasing gloves, request documentation from the manufacturer that the gloves meet the appropriate test standard(s) for the hazard(s) anticipated. Other factors to be considered for glove selection in general include:

1. As long as the performance characteristics are acceptable, in certain circumstances, it may be more cost effective to regularly change cheaper gloves than to reuse more expensive types.
2. The work activities of the employee should be studied to determine the degree of dexterity required, the duration, frequency, and degree of exposure of the hazard, and the physical stresses that will be applied.

Chemical Hazards

The first consideration in the selection of gloves for use against chemicals is to determine, if possible, the exact nature of the substances to be encountered. Read instructions and warnings on chemical container

labels and MSDSs before working with any chemical. Recommended glove types are often listed in the section for personal protective equipment.

All glove materials are eventually permeated by chemicals. However, they can be used safely for limited time periods if specific use and glove characteristics (i.e., thickness and permeation rate and time) are known. The safety office can assist in determining the specific type of glove material that should be worn for a particular chemical.

- The toxic properties of the chemical(s) must be determined; in particular, the ability of the chemical to cause local effects on the skin and/or to pass through the skin and cause systemic effects.
- Generally, any "chemical resistant" glove can be used for dry powders;
- For mixtures and formulated products (unless specific test data are available), a glove should be selected on the basis of the chemical component with the shortest breakthrough time, since it is possible for solvents to carry active ingredients through polymeric materials.
- Employees must be able to remove the gloves in such a manner as to prevent skin contamination.

Appendix

PPE Hazard Assessment Form

Housekeeping & Material Storage

Good housekeeping is a necessary requirement for maintaining safety in all work areas. Clean and tidy work areas hold fewer hazards for all employees. Accidents and injuries are avoided and productivity improved where good housekeeping is a daily occurrence. This document informs interested persons, including employees that our company is complying with OSHA's housekeeping requirements.

Many regulations lead to housekeeping procedures. Common sense and safety concerns encourage standardization of housekeeping measures in the workplace. William Warren Properties has developed a set of written housekeeping procedures. In this way we have standardized housekeeping measures and are providing clear expectations and procedures for housekeeping at our company.

Good housekeeping is possibly the most visible evidence of management and employee concern for safety and health that a company displays on a day-to-day basis. Orderliness in our workplace contributes to a safe working environment by minimizing obstacles and potential safety and health threats such as spills, trip hazards, etc. In fact, we have nine good reasons for housekeeping:

1. Prevents accidents
2. Prevents fire
3. Saves time
4. Gives control to our workers
5. Increases production
6. Gives our workers the freedom to move
7. Gives our workers pride
8. Protects our products and equipment
9. Reduces our waste.

Our Written Housekeeping Program begins with a purpose statement. Then it provides a section to explain our expectations for a walk-around assessment. We have also included specific housekeeping procedures. Because no program can be successful without employee participation, we train our employees in the procedures. Plus, we have a system to promptly address and resolve any housekeeping-related accidents and hazard reports.

Purpose Statement

This document serves as the written procedures for general housekeeping at William Warren Properties. These guidelines provide housekeeping standards in this facility to help ensure a safe work environment at all times in all areas.

Administrative Duties

Safety Manager, is responsible for developing and maintaining the program. A copy of the plan may be reviewed by employees. It is located in the Safety Manager's Office. In addition, each Supervisor is responsible for maintaining any records related to the housekeeping program.

If after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of our written housekeeping program. We strive for clear understanding, safe behavior, and involvement from every level of the company.

Walk-Around Assessment

At least every four months the District Manager walk(s) around the facility for an assessment to identify main housekeeping issues. These persons look for a lack of order, unremoved spills or obstructions, or other hazards due to poor organization or poor housekeeping. They ask employees working in each area to identify and recommend corrective actions for their area. They also walk around the grounds to see if there is refuse or an untidy appearance due to storing materials haphazardly. In addition, they check the OSHA Form 300 injury and illness records (which are located Safety Manager's office) to see if one or more incidents such as slips, trips, falls, or other types of accidents were related in some way to poor housekeeping.

Responsibilities

All Employees share the responsibility for maintaining good housekeeping practice and following the established housekeeping procedures. The Safety Manager, and each District Manager will be responsible to monitor housekeeping as part of their facility safety inspection procedures, note any hazards or areas of non-compliance, initiate clean-up procedures and provide follow-up. Management has the additional responsibility to provide disciplinary action when necessary to reinforce compliance with this program.

Main Facility and Work Area Housekeeping Procedures

Office areas are to be kept neat and orderly. The following general rules apply to prevent injuries and maintain a professional appearance.

1. All aisles, emergency exits, fire extinguishers, etc., will be kept clear (a minimum of three feet of either side) of material storage (temporary and permanent) at all times.
2. Storage areas will be maintained orderly at all times. When supplies are received, the supplies will be stored properly.
3. Spills will be cleaned-up immediately and wastes disposed of properly.
4. All waste receptacles will be lined with a plastic trash bag to avoid direct contact while handling. Custodial Employees will use rubber gloves and compaction bar when handling wastes.
5. Keep file and desk drawers closed when not attended to avoid injuries. Open only one drawer at a time to prevent tipping of file cabinets.
6. At the end of the business day, turn off all office equipment (area heaters, lamps, coffee-maker,
7. PCs, etc.) and lights to save energy and prevent fires. All space heaters must be un-plugged at the end of the day to assure they have been turned-off.

Work areas will be kept neat and orderly, during operations and as follows:

1. All aisles, emergency exits, fire extinguishers, eye wash stations, etc., will be kept clear (a minimum of three feet in front of and to either side) of product storage, material storage, fork trucks and pallet jacks at all times.
2. Spills will be cleaned up immediately.
3. All process leaks will be reported to supervision and maintenance for immediate repair and clean-up.
4. Utility Employees will be responsible to keep aisles and work floors clear of excessive debris and waste materials during shift operation, between breaks and at shift change when necessary or directed by supervision; however, all Employees are responsible to communicate slippery floors to supervision for immediate clean-up.

5. All refuse and waste materials will be placed in the recognized waste containers for disposal.

Restrooms and break areas are provided as a convenience for all Employees. The following rules will apply:

1. Employees are expected to clean-up after themselves as a common courtesy to fellow Employees.
2. Flammable materials (fire works, explosives, gasoline, etc.) may not be stored in break areas or brought on company property.
3. Personal food item will not be stored in break areas overnight.
4. All waste receptacles will be lined with a plastic trash bag to avoid direct contact while handling and Custodial Employees will use rubber gloves and compaction bar when handling wastes.
5. All refuse and waste materials will be placed in the recognized waste containers for disposal.
6. Employees must wear gloves and use proper PPE when cleaning the restrooms on the properties.

Ladders

1. All ladders are to be inspected prior to use by any employee to ensure there is no damage to a rung or step. If any ladder has any damage, it is to be removed from service immediately and either repaired or discarded if it cannot be fixed.
2. Employees are not to stand on the top step of the ladder and to use the ladder as it was designed.
3. The company does not allow in our facilities step ladders over 6 feet high
4. At some locations that offer lockers, rolling ladders are used. (insert special instructions on rolling ladders (e.g. Hawaii))

Maintenance Areas

1. All aisles, emergency exits, fire extinguishers, etc., will be kept clear (a minimum of three feet of either side) of material storage (temporary and permanent) at all times.
2. Storage Areas will be maintained orderly at all times:
 - Pipe stock stored horizontally on racks and sorted by size
 - Metal stock stored horizontally on racks and sorted by size
 - Sheet metal stock stored vertically in racks and sorted by type
 - All fittings, etc., stored in bins on shelves and sorted by type and use
 - All flammables stored in OSHA-approved Fire Cabinets and self-closing cans where necessary
3. Spills will be cleaned-up immediately by the person responsible and wastes disposed properly.
4. All refuse and waste materials will be placed in the recognized waste containers for disposal.

Grounds

The grounds surrounding our main facility and worksites are an extension of the work place. Grounds that are kept neat and orderly show pride by the Company for Employees, customers and neighbors to enjoy. The following general rules will apply:

1. Keep the parts of buildings that are visible to public roads cleaned by washing them at regular intervals.
2. Keep the other parts of buildings cleaned at regular intervals.
3. Keep all doors and loading docks completely free of debris, shrubs, or other obstructions.
4. Maintain visibility through all windows by washing at regular intervals.
5. Keep doors and windows properly maintained in good working order.
6. Repair any damage to doors and windows at regular intervals.
7. All trash will be discarded only in the waste containers provided.

8. Park only in the designated assigned area.
9. The Maintenance Department will be responsible for grounds keeping (mowing, trimming, etc.) as needed. Maintenance will also establish procedures for ice/snow removal, when necessary, prior to operations each day.
10. Provide any stairs or platforms adjacent to or leading into the building(s) with adequate rails, adequate treads to climb, and an area clean and free of materials.
11. Keep grounds neat and orderly, free of refuse and unnecessary materials.
12. Store materials outdoors only in designated areas of the grounds.
13. Provide designated walkways through grounds, preferably paved and kept clear of snow, ice, materials, or any other physical hazards.
14. Provide a lighting system that is adequate to allow employees to navigate around the grounds as necessary at dusk and after dark.
15. Maintain a neat landscaping appearance--trim lawn, trees and shrubs in such a way as to minimize any possible safety hazards.
16. Trim grass short enough to prevent trip hazards to employees.
17. Prevent trees and shrubs from obstructing doors and windows.

Material Storage

Proper storage procedures are required for dry, raw materials, flammables and compressed gases storage to prevent fires, keep exits and aisles clear and avoid injuries and illnesses. General rules for material storage are as follows:

Materials Storage

1. Materials may not be stored any closer than 18 inches to walls or sprinkler heads. A minimum of 3 feet side clearance will be maintained around doorways and emergency exits. Passageways and aisle will be properly marked and a minimum of six feet in width. Materials, fork lifts, pallet jacks, etc., may not be stored in aisles or passageways.
2. Aisles and passageways will be kept clear of debris. All spills of materials will be immediately cleaned-up by the person responsible.
3. All platforms and racks will have maximum load capacity displayed. The weight of stored material will not exceed the rated load capacity.

Flammable Storage

1. All flammables will be stored in OSHA-approved flammable storage cabinets or stored outside (at least 50 feet from any structure)
2. Fuels, solvents and other flammables (not stored in original shipping containers) will be stored in OSHA-approved self-closing containers with flame arresters. Flammables may not be stored in open containers (open parts baths, etc.).
3. Flammable storage areas will be kept dry and well ventilated. No storage of combustible materials, open flames or exposed electrical components are permitted in the flammable storage area.
4. Flammable or combustible materials may not be stored in electrical rooms. Electrical rooms must be kept clean and dry at all times.

Fire Prevention Plan

Purpose

The Company Fire Safety Plan has been developed to work in conjunction with company emergency plans and other safety programs. This includes reviewing all new building construction and renovations to ensure compliance with applicable state, local, and national fire and life safety standards. Fire prevention measures reduce the incidence of fires by eliminating opportunities for ignition of flammable materials.

This FPP is in place at this company to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. This plan addresses the following issues:

- Major workplace fire hazards and their proper handling and storage procedures.
- Potential ignition sources for fires and their control procedures.
- The type of fire protection equipment or systems which can control a fire involving them.
- Regular job titles of personnel responsible for maintenance of equipment and systems installed to prevent or control ignition of fires and for control of fuel source hazards.

Under this plan, our employees will be informed of the plan's purpose, preferred means of reporting fires and other emergencies, types of evacuations to be used in various emergency situations, and the alarm system. The plan is closely tied to our emergency action plan where procedures are described for emergency escape procedures and route assignments, procedures to account for all employees after emergency evacuation has been completed, rescue and medical duties for those employees who perform them. Please see the emergency action plan for this information.

Safety Manager, is the program coordinator, who has overall responsibility for the plan. The written program is kept in Safety Manager's office. He will review and update the plan as necessary. Copies of this plan may be obtained in the Safety Manager's office.

The FPP communicates to employees, policies and procedures to follow when fires erupt. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

If after reading this program, you find that improvements can be made, please contact Safety Manager. We encourage all suggestions because we are committed to the success of our emergency action plan. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Safety Manager Responsibilities

Here at William Warren Properties, the Safety Manager is responsible for the following activities. The person must:

1. Develop a written fire prevention plan for regular and after-hours work conditions.
2. Immediately notify the local fire department fire or police departments, and the building owner/superintendent in the event of a fire affecting the office.
3. Integrate the fire prevention plan with the existing general emergency plan covering the building occupied.

4. Distribute procedures for reporting a fire, the location of fire exits, and evacuation routes to each employee.
5. Conduct drills to acquaint the employees with fire procedures, and to judge their effectiveness.
6. Satisfy all local fire codes and regulations as specified.
7. Train designated employees in the use of fire extinguishers and the application of medical first-aid techniques.
8. Keep key management personnel home telephone numbers in a safe place in the office for immediate use in the event of a fire. Distribute a copy of the list to key persons to be retained in their homes for use in communicating a fire occurring during non-work hours.
9. Decide to remain in or evacuate the workplace in the event of a fire.
10. If evacuation is deemed necessary, the on-site supervisor ensures that:
 - All employees are notified and a head count is taken to confirm total evacuation of all employees.
 - When practical, equipment is placed and locked in storage rooms or desks for protection.
 - The building owner/superintendent is contacted, informed of the action taken, and asked to assist in coordinating security protection.
 - In locations where the building owner/superintendent is not available, security measures to protect employee records and property are arranged as necessary.

Workplace Fire Hazards

It is the intent of this company to assure that hazardous accumulations of combustible waste materials are controlled so that a fast developing fire, rapid spread of toxic smoke, or an explosion will not occur. Employees are to be made aware of the hazardous properties of materials in their workplaces, and the degree of hazard each poses.

Fire prevention measures must be developed for all fire hazards found. Once employees are made aware of the fire hazards in their work areas, they must be trained in the fire prevention measures developed and use them in the course of their work. For example, oil soaked rags must be treated differently than general paper trash in office areas. In addition, large accumulations of waste paper or corrugated boxes, etc., can pose a significant fire hazard. Accumulations of materials which can cause large fires or generate dense smoke that are easily ignited or may start from spontaneous combustion, are the types of materials with which this fire prevention plan is concerned. Such combustible materials may be easily ignited by matches, welder's sparks, cigarettes and similar low level energy ignition sources. It is the intent of this company to prevent such accumulation of materials.

Certain equipment is often installed in workplaces to control heat sources or to detect fuel leaks. An example is a temperature limit switch often found on deep-fat food fryers found in restaurants. There may be similar switches for high temperature dip tanks, or flame failure and flashback arrester devices on furnaces and similar heat producing equipment. If these devices are not properly maintained or if they become inoperative, a definite fire hazard exists. Again employees and supervisors should be aware of the specific type of control devices on equipment involved with combustible materials in the workplace and should make sure, through periodic inspection or testing, that these controls are operable. Manufacturer's recommendations should be followed to assure proper maintenance procedures.

Fuel is used throughout the building and work areas/sites as an energy source for various systems or equipment. This fuel can be a significant fire hazard and must be monitored and controlled. Flammables

are stored in safe, approved areas away from flames, sparks, heat, or other ignition sources.

Potential Ignition Sources

Flammable or combustible materials may not ignite on their own without an external source of ignition.

Chemicals can cause serious injuries through physical (fire or explosion) or health (burns or poisons) hazards. Chemicals are classified by the inherent properties that make them hazardous.

- Flammable - these chemicals catch fire very easily; hazards include property damage, burns and injuries that result when toxic and corrosive compounds are released into the air.
- Reactive - a reactive material is one that can undergo a chemical reaction under certain conditions; reactive substances can burn, explode, or release toxic vapor if exposed to other chemicals, air or water.
- Explosive - an explosive is a substance that undergoes a very rapid chemical change producing large amounts of gas and heat; explosions can also occur as a result of reactions between chemicals not ordinarily considered explosive.

The National Fire Protection Association (NFPA) has classified four general types of fires, based on the combustible materials involved and the kind of extinguisher needed to put them out. The four fire classifications are A, B, C and D.

- Class A. This type of fire is the most common. The combustible materials are wood, cloth, paper, rubber and plastics. The common extinguisher agent is water, but dry chemicals are also effective. Carbon dioxide extinguishers and those using sodium or potassium bicarbonate chemicals are not to be used on this type of fire.
- Class B. Flammable liquids, gases and greases create class B fires. The extinguishers to use are foam, carbon dioxide and dry chemical. Also, water fog and vaporizing liquid extinguishers can be used.
- Class C. Class C fires are electrical fires and a non-conducting agent must be used. Carbon dioxide and dry chemical extinguishers are to be used. Never use foam or water-type extinguishers on these fires.
- Class D. Combustible metals, such as magnesium, titanium, zirconium and sodium fires are class D. These fires require specialized techniques to extinguish them. None of the common extinguishers should be used since they can increase the intensity of the fire by adding an additional chemical reaction.

There are only two dry chemical extinguishers that can be used on A, B, and C fires, and those are multi-purpose ABC extinguishers, either stored pressure or cartridge operated. Multi-purpose extinguishers (ABC) will handle all A, B, and C fires. All fire extinguishers are labeled with either ABC, or A, or B, or C.

- Type of Fire: A, combustibles like wood, paper, etc.
Type of Extinguisher: A or ABC, water or dry chemicals
- Type of Fire: B, flammable liquids, gases and greases
Type of Extinguisher: B or ABC, foam, carbon dioxide, dry chemicals
- Type of Fire: C, electrical fires
Type of Extinguisher: C or ABC, non-conducting agent such as carbon dioxide and dry

chemicals

- Type of Fire: D, combustible metals such as titanium and sodium.
Type of Extinguisher: This type of fire calls for specialized techniques for which the fire department will be called.

Maintenance of Fire Protection Equipment

Once hazards are evaluated and equipment is installed to control them that equipment must be monitored on a regular basis to make sure it continues to function properly. The following personnel are responsible for maintaining equipment and systems installed to prevent or control fires: VP operations, VP Construction, District Managers and Safety Manager.

These individuals follow strict guidelines for maintaining the equipment. Fire extinguishers are inspected on an annual basis with each receiving an annual hydrostatic test.

Housekeeping Procedures

Our company controls accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire.

The following procedures have been developed to eliminate or minimize the risk of fire due to improperly stored or disposed of materials.

1. All aisles, emergency exits, fire extinguishers, eye wash stations, etc., will be kept clear (a minimum of three feet in front of and to either side) of product storage, material storage, fork trucks and pallet jacks at all times.
2. Storage areas will be maintained orderly at all times. When supplies are received, the supplies will be stored properly.
3. Spills will be cleaned-up immediately and wastes disposed of properly.
4. All process leaks will be reported to supervision and maintenance for immediate repair and clean-up.
5. All refuse and waste materials will be placed in the recognized waste containers for disposal keeping floor free of paper or saw dust, storing oily rags in specially designed containers, storing all flammables in fire cabinets when not in use
6. At the end of the business day, turn off all office equipment (area heaters, lamps, coffee-maker, PCs, etc.) and lights to save energy and prevent fires. All space heaters be un-plugged at the end of the day to assure they have been turned-off.

Training

At the time of a fire, employees should know what type of evacuation is necessary and what their role is in carrying out the plan. In cases where the fire is large, total and immediate evacuation of all employees is necessary. In smaller fires, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary for continued plant operation. We must be sure that employees know what is expected of them during a fire to assure their safety.

This document is not one for which casual reading is intended or will suffice in getting the message across. If passed out as a statement to be read to oneself, some employees will choose not to read it, or

will not understand the plan's importance.

In addition, training on the plan's content is required by OSHA.

A better method of communicating the fire prevention plan is to give all employees a thorough briefing during the new hire process. Safety Manager has all managers and supervisors present the plan to their staffs in small meetings.

Training, conducted on initial assignment, includes:

- What to do if employee discovers a fire
- Demonstration of alarm, if more than one type exists
- How to recognize fire exits
- Evacuation routes
- Assisting employees with disabilities
- Measures to contain fire (e.g., closing office doors, windows, etc. in immediate vicinity)
- Head count procedures (see EAP for details)
- Return to building after the "all-clear" signal

The employer must inform employees of the fire hazards of the materials and processes to which they are exposed.

The employer shall review with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency.

The plan shall be communicated orally for each specific facility location.

If the Safety Manager has reason to believe an employee does not have the understanding required, the employee must be retrained. The Safety Manager certifies in writing that the employee has received and understands the fire prevention plan training.

Because failure to comply with company policy concerning fire prevention can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined.

The Safety Manager/supervisor provides training for each employee who is required to use fire prevention equipment. Employees shall not use fire prevention equipment without appropriate training. Training, before an individual is assigned responsibility to fight a fire, includes:

- Types of fires
- Types of fire prevention equipment
- Location of fire prevention equipment
- How to use fire prevention equipment
- Limitations of fire prevention equipment
- Proper care and maintenance of assigned fire prevention equipment and
- Employees must demonstrate an understanding of the training and the ability to use the equipment properly before they are allowed to perform work requiring the use of it.

If the Safety Manager has reason to believe an employee does not have the understanding or skill required, the employee must be retrained. The Safety Manager certifies in writing that the employee has received and understands the fire prevention equipment training.

Emergency Action Plan

Purpose

William Warren Properties is dedicated to the protection of its employees from emergencies such as tornadoes, hurricanes, flooding, earthquakes, power outages, ash fallout, robberies, fires and shelter in place order. 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.

OSHA's Emergency Action Plan requirements, require William Warren Properties to have a written emergency action plan (EAP). This EAP addresses emergencies that our company expects may reasonably occur at any of sites.

The 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 OSHA officials who ask to see it.

Administrative Duties

The District Managers will be responsible for the following:

- Developing and maintaining a written Emergency Action Plan for regular and after hours work conditions for the stores in their district working with the Safety Manager and their employees;
- Notifying the local fire or police departments, 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;
- Deciding which emergency response to initiate (evacuate or not);
- 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.

An EAP is store at the actual location and copies of all EAPs may be obtained from the Safety Manager's office.

The Safety Manager has full authority to decide to implement the EAP if they believe an emergency might threaten human health. The following potential emergencies might reasonably be expected at our properties and thus call for the implementation of on an EAP:

- Fire emergencies

- Toxic gas releases
- Flammable gas releases
- Hazardous liquid spills
- Oil spills
- Release of radiation
- Tornadoes
- Hurricanes
- Winter storms
- Flooding/ Tsunami
- Bomb threat/Civil disturbance
- First-aid emergencies

Key management personnel home telephone numbers are kept in a safe place, on office and work area bulletin boards, and in company vehicles, for immediate use in the event of an emergency. These telephone numbers of key management personnel have been distributed all supervisors to be retained in their homes for use in communicating an emergency occurring during non-work hours:

Alarms

Different emergencies call for different alarms to indicate what actions employees should take. William Warren Properties has established an employee alarm system that complies with 29 CFR 1910.165.

Medical Emergencies

All Medical Treatment provided by OHCP employed by Company shall follow the *Medical Directives and Nursing Procedures for Emergency Care*

1. After a medical emergency has been identified, the Assigned Manager, Occupational Health Care Professional or Senior Management Team Member and Area Supervisor should be notified immediately. The Area Supervisor has the responsibility to assure that the Assigned Manager, OHCP or Senior Management Team Member has been notified.
2. The severity of the medical emergency and level of action required will be determined by the on-site OHCP.
3. All Medical Emergency Care Providers will use the proper PPEs as outlined in the *Control of Blood-borne Pathogens Program* and will follow the proper standards of care.
4. All injured or ill Employees requiring emergency medical care for life/death medical emergencies will be transported by local Emergency Medical Services (EMS) to the nearest local Hospital.
5. All non-life/death medical emergencies will be managed by the OHCP and Company Physician following proper standards of care.
6. All Employees who are involved in an injury or accident shall be screened for drugs and alcohol as prescribed by company policy.
7. During any emergency, the OHCP or Assigned Manager will have the responsibility to set-up the emergency medical care station at a location directed by the Senior Management Team Member depending on the emergency and relevant conditions.

Plan Administrator Duties

During an emergency, the Safety Manager or her representative will do the following:

- Take all necessary measures to contain the hazard and prevent its spread to other nearby areas, with the assistance of emergency personnel.
- If the emergency is a hazardous material spill, ensure that the hazardous material and any material with which it came into contact (gravel, soil, etc.), will be scraped up using shovels and/or brooms. All this combined material will be considered hazardous waste unless analysis shows otherwise.
- Provide for collection, treatment, and disposal of the waste and contaminated material by the emergency crew or outside contractor, as appropriate.
- Ensure that contaminated soil, liquids, or other material is placed in drums and handled as a hazardous waste.
- Ensure that the emergency crew restores all emergency equipment to full operational status.
- Assisted by other qualified persons, begin to investigate the cause of the emergency and take steps to prevent a recurrence of such or similar incidents.
- Ensure that the cause of the emergency has been eliminated and that cleanup and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that EPA, state, and local authorities have been notified, if required.
- Ensure that for spills or releases involving a hazardous substance at or above its reportable quantity, the following necessary information is recorded and reported: name of chemical(s) involved, whether the substance is listed under 40 CFR 302—extremely hazardous substances, estimated quantity of the released substance, time of the release and duration, medium into which the substance was released, health risks associated with the release, precautions taken to respond to the release, name and telephone numbers of persons who can be contacted for further information.

Training

Our Safety Manager or her representatives reviews with each of our employees at the following times, those parts of the Emergency Action Plan that employees must know to protect themselves in the event of an emergency:

- Initially when the plan is developed,
- Whenever an employee's responsibilities or designated actions under the plan change, and
- Whenever the plan is changed.

Emergency Action Diagram

Each facility should have an Emergency Action Diagram showing the following:

- Exit Locations
- Fire Extinguisher Locations
- Storage Locations for Hazardous/Flammable Materials
- Storage Area for Spill Response Supplies and Personal Protective Equipment
- Shelters

First Aid Program

Purpose

William Warren Properties 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 see that the needs of the injured or ill are met.

This written First Aid Program is intended to ensure that William Warren Properties meets the requirements of 29 CFR 1910.151, Medical Services and First Aid.

Administrative Duties

The Safety Manager, the First Aid Program Administrator, 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.

Company Policy

In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons are adequately trained to render first aid and adequate first aid supplies are readily available.

The Company provides a First Aid Kit on the premises. It is there for employee's use in the treatment of minor scratches, burns, headaches, nausea, etc. All employees shall know the location of the First Aid Kit and shall notify their supervisor if they need to use the First Aid Kit.

If an employee has a work-related injury or illnesses that requires professional medical assistance, they shall notify their supervisor immediately and let him/her know before they receive this assistance. If they fail to notify their supervisor, they may be ineligible for Worker's Compensation, benefits to pay for doctor's bills, and/or lost wages.

District Managers and Property Managers should notify the Safety Manager when they need more supplies for their First Aid Kits.

In all cases requiring emergency medical treatment, immediately call, or have a co-worker call, to request emergency medical assistance.

Minor First Aid Treatment

First aid kits are stored in the main office building and in each company vehicle. If an employee sustains an injury or are involved in an accident requiring minor first aid treatment, they shall:

- Inform their DM.
- Administer first aid treatment to the injury or wound.
- If a first aid kit is used, indicate usage on the accident investigation report.
- Access to a first aid kit is not intended to be a substitute for medical attention.
- Provide details for the completion of the accident investigation report.

Non-Emergency Medical Treatment

For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If an employee sustains an injury requiring treatment other than first aid, they shall:

- Inform your DM.
- Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of the accident investigation report.

Emergency Medical Treatment

If an employee sustains a severe injury requiring emergency treatment:

- Call for help. *Fixed line telephones and mobile or cellular phones are available to contact emergency medical service.*
- Use the emergency telephone numbers and instructions posted next to the telephone in your work area to request assistance and transportation to the local hospital emergency room.
- Provide details to your supervisor or Human Resources for the completion of the accident investigation report.

First Aid Supplies and Equipment

It is important that our first aid supplies meet the specific needs of our worksite. District Managers and the Safety Manager has ensured that adequate first aid supplies are readily available, including:

- Variety of bandages, compresses, and gauze pads
- Antiseptic swabs
- Burn treatments
- Adhesive tape
- Latex or similar gloves
- Eye dressing
- Eyewash solution
- Instant cold packs
- Antibiotic cream
- Ammonia inhalants

The contents of the first aid kit shall be placed in a weatherproof container with individual sealed packages for each type of item. They are located in the main office building and each company vehicle.

The District Managers check the first aid supplies. Supplies are replaced promptly when expended. The property managers are responsible for checking the first aid supplies periodically and notifying their District Manager or the Safety Manager of any needed items.

Program Evaluation

By having the Safety Manager 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.

Bloodborne Pathogen Program

Policy Statement

It is the policy of William Warren Properties to provide a safe and healthful workplace for our employees. This policy and procedure will provide a method to safe guard our employees from being occupationally exposed to blood and other potentially infectious materials (OPIM), during first-aid and emergency situations. It is also the intent of this policy to comply with federal OSHA requirements listed in 29 CFI 1910.1030.

Scope

This policy applies to individuals, who in an emergency situation, have the potential for being exposed to blood and other potentially infectious materials when responding solely to injuries resulting from workplace incidents. This policy also applies to janitorial personnel who are directly responsible for the cleanup of an incident site after an accident.

Responsible Persons

There are three groups of responsible persons that are central to the effective implementation of our Bloodborne Pathogen Program. These are:

- The Safety Manager
- Department Supervisors
- Our employees

Safety Manager

The Safety Manager will be responsible for the overall management and support of our facility's Bloodborne Pathogens Program. Activities delegated to this position typically include, but are not limited to:

- Primary responsibility for implementing the Exposure Control Program for the entire facility.
- Working with management and other employees to develop and administer any additional bloodborne pathogens related policies and practices needed to support the effective implementation of this plan.
- Looking for ways to improve the Exposure Control Program, as well as to revise and update the plan when necessary.
- Collecting and maintaining suitable reference materials.
- Acting as facility liaison during OSHA inspections.
- Conducting periodic facility audit to maintain an up-to-date Exposure Control Program.
- Maintaining an up-to-date list of facility personnel requiring training, in conjunction with facility management.
- Developing suitable education and training.

District Managers

District Managers are responsible for exposure control in their receptive areas. They work directly with the Safety Manager and our employees to ensure the proper exposure control measures are followed.

Employees

As with all of our facility's safety programs, our employees have the most important role in our Bloodborne Pathogens Compliance Program, for the ultimate execution of much of the program rest in their hands. In this role they may be required to know and perform the following:

- Know what tasks, if any, they perform having occupational exposure.
- Attend the Bloodborne Pathogens Training Sessions.
- Plan and conduct all operations in accordance with our work practice controls.
- Develop good personal hygiene habits.

Availability of the Exposure Control Plan to Employees

To help employees with their efforts, our facility's Exposure Control Plan is available. Employees are advised of this availability during their education and training sessions. Copies of the Exposure Control Plan are kept in the Safety Manager's office.

Plan Review and Update

To keep our Exposure Control up-to-date, the plan will be reviewed and updated under the following circumstances:

- Annually.
- Whenever new or modified tasks and procedures are implemented, which could affect occupational exposure of employees.
- Whenever our employees' jobs are revised such that new instances of occupational exposure may occur.
- Whenever we establish new functional positions within our facility that may involve exposure to bloodborne pathogens.

Exposure Determination

OSHA requires employers to conduct an exposure determination concerning which employees may incur occupational exposure to potentially infectious materials. The exposure determination is made without regard to the use of personal protective devices. This is, the employee is considered exposed even if they wear personal protective equipment. At WWP, the following job classifications have been determined to have the possibility of an occupational exposure to bloodborne pathogens:

- Property Manager- Task or procedures which may cause exposure is attending a work related injury. Additionally, cleaning of restrooms and cleaning of a first aid station or accident site. (only employees who have received first aid training should be attending an injury.)
- District Manager - Task or procedures which may cause exposure is attending a work related injury.

The Safety Manager will work with department supervisors and foreman to review and update this list as our tasks, procedures, and classifications change.

Methods of Compliance

We understand that there are a number of areas that must be addressed in order to effectively eliminate or minimize exposure to bloodborne pathogens in our facility.

These areas consist of:

- The use of Universal Precautions.
- Establishing appropriate Engineering Controls.
- Implementing appropriate Work Practice Controls.
- Using necessary Personal Protective Equipment.
- Implementing appropriate Housekeeping Procedures.

Universal Precautions

Universal precautions will be observed at our 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.

- Gloves will be worn when touching blood or other body fluids, mucus membranes, non-intact skin, or handling items or surfaces soiled with blood or other body fluids.
- If it is anticipated droplets of blood or any body fluid may be come in contact with the mucus membranes of the employees' eye, nose or mouth, he/she will wear protective equipment. {i.e. goggles or face shield}
- Hands or other skin surfaces will be washed immediately if contaminated with blood or other body fluids. Hands will also be washed immediately upon glove removal.
- Any items such as razors, knife blades, broken glass or equipment will be disposed of in a puncture and leak proof container, labeled for disposal of such items.
- If clothing is contaminated it is to be removed as soon as possible.

Engineering Controls

Engineering controls help to eliminate or minimize employee exposure to bloodborne pathogens. At our facility, the following engineering controls will be utilized:

- Use of containers and appropriate disposal bags for potentially infectious waste.
- Hand-washing facilities which are readily accessible to the employees who incur exposure to blood and other potentially infectious materials. Hand-washing facilities are located in the first aid room and restrooms.

Personal Protective Equipment

Personal protective equipment is our employees' "last line of defenses" against bloodborne pathogens. Our facility provides, at no cost to employees, the personal protective equipment they need to protect

themselves against exposure. This equipment includes, but not limited to those listed below:

- Gloves
- Goggles
- Face shields

The Safety Manager, working with the DM, is responsible for ensuring that all department and work areas have appropriate personal protective equipment available to employees.

Employees' personal protective equipment is chosen based on the anticipated exposure to blood or other potentially infectious materials.

To ensure that personal protective equipment is not contaminated and is in the appropriate condition to protect employee from potential exposure, our facility adheres to the following practices:

- All personal protective equipment is inspected periodically and repaired or replaced as needed to maintain its effectiveness.

To insure equipment is used as effectively as possible, our employees adhere to the following practices when using their personal protective equipment.

- All potentially contaminated personal protective equipment is removed prior to leaving a work area.
- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured, or otherwise lose their ability to function as an exposure barrier. Reusable utility gloves are not used at this facility.

Housekeeping

Maintaining our facility in a clean and sanitary condition is an important part of our Exposure Control Plan for Bloodborne Pathogens. Our staff employs the following practices:

- Any surface or equipment contaminated with blood or other body fluids will be cleaned as soon as possible.
- Employees will use paper towels to remove the visible materials and then decontaminate using 10:1 water and bleach solution that is one cup bleach to ten cups water.
- Cleaning products such as paper towels and gloves will be placed in plastic bags for disposal.
- Regulated wastes, including bandages, feminine hygiene products, etc. are also placed in plastic bags for disposal.
- WWP employees should only clean minor incidents following these procedures. A professional cleaning company will be utilized in all other scenarios.

The Safety Manager, working with the DM, is responsible for setting up our cleaning and decontamination schedule and insuring it effectiveness within our facility.

Training Topics

Training will be provided to all affected employees at the time of hire and at least annually there after.

Training Methods

Our company's training presentation typically consists of a classroom type atmosphere with personal instruction and employee handouts. Time is allotted to provide the employees an opportunity to ask questions and interact with the instructor.

Recordkeeping

We maintain training records containing the following information:

- Dates of all training sessions.
- Contents/summary of the training sessions.
- Name and qualifications of the instructor(s).
- Names and job titles of employees attending the training sessions.

The training records are available for examination and photocopying by employees and their representatives, as well as OSHA and its representatives. These records are maintained by the Safety Manager.

Information and Training

All employees who have the potential for exposure to bloodborne pathogens are put through a comprehensive training program providing them with as much information as possible on the issue.

New employees or employees changing jobs or job functions requiring training in bloodborne pathogens will receive this training at the time of their new job assignment. After initial training, employees will be retrained at least annually to keep their knowledge current.

The Safety Manager is responsible for seeing that all employees who have any potential for exposure to bloodborne pathogens receive this training.

Employee Safety Handbook

General Health & Safety Policies

William Warren Properties' policy is that all employees be provided with a safe and healthful place of employment. Identification of hazardous conditions may be accomplished at the planning and design stage, as a result of workplace inspections, or by employee reports. All recognized safety and health hazards shall be eliminated or controlled as quickly as possible, subject to priorities based upon the degree of risk posed by the hazards. The preferred method of hazard abatement shall be through application of engineering controls or substitution of less hazardous processes or materials. Total reliance on personal protective equipment is acceptable only when all other methods are proven to be technically and/or economically infeasible.

Safety Rules have been developed with input from the DMs and Employees. While held to a minimum, the rules address behaviors and work practices that can lead to accidents and injuries. Each Employee should become familiar with and follow General and Departmental Safety Rules. Supervisors must enforce Safe Work practices through strict adherence to Safety Rules. Most accidents can be prevented if everyone uses assigned safety equipment and follows the established safety rules. To operate a safe and successful business, we must work as a team to

THINK SAFE, WORK SAFE, AND BE SAFE.

Why Work Safely?

Work safely for the most important people in your life, your family.

If you are injured at work the people you will directly affect the most will be your family.

A work related injury could cause you to be unable to play with your children, take part in recreational activities or hobbies.

What is working safely?

- Wearing required PPE such as safety glasses.
- Completing every task the correct way, not taking hazardous shortcuts.
- Paying attention to the task at hand.
- Asking your supervisor how to complete unfamiliar tasks.

Your Safety Rights

You have several important rights concerning safety, which are protected by federal, state and local laws that you should be aware of. They are:

- The right to a safe work-place free from recognized hazards
- The right to request information on safety and health hazards in the workplace, precautions that may be taken, and procedures to be followed if an employee is injured or exposed to toxic substances.
- The right to know about the hazards associated with the chemicals you work with, and the safety procedures you need to follow to protect yourself from those hazards.
- The right to question any instruction which requires you to disobey a safety rule, which puts

yourself or someone else in unnecessary danger of serious injury, or requires you to perform a task for which you have not been trained to safely perform.

- The right to access your medical and exposure records.
- The right of freedom from retaliation for demanding your safety rights.

Your Safety Responsibilities

You also have some important responsibilities concerning safety. These are:

- The responsibility of reporting all injuries and illnesses to your supervisor, no matter how small.
- The responsibility of always following the safety rules for every task you perform,
- The responsibility of reporting any hazards you see.
- The responsibility of helping your co-workers recognize unsafe actions or conditions they cause.
- The responsibility of asking about the safety rules you are not sure about.

William Warren Properties, Inc. provides the following email address that is solely for any employee reporting any safety hazards or concerns to the company: safety@williamwarren.com

Employee Safety Rules

It is impossible to list or include all safety rules for all the possible tasks you may have to do. But the following rules have been prepared to help you avoid hazards, which may cause injury while doing some of the more common tasks you may be asked to do. You should study and follow the rules provided in this booklet, and to ask your supervisor for additional rules when asked to do a task you are not familiar with, and this booklet does not cover. Failure to follow safety rules and /or safe practices will result in disciplinary action, up to and including termination.

General Safety Rules

- Read and follow the safety notices and other information that is posted.
- Observe and follow all safety instructions, signs, and operation procedures.
- Help your fellow employee when they ask for assistance or when needed for their safety.
- Never participate in “horseplay”. Horseplay that results in injury is often not covered by Workers’ Compensation.
- Clean up spills immediately.
- Report all unsafe conditions, hazards, or equipment immediately. Make sure other people are warned of the problem so that they may avoid it.
- Wear personal protective equipment as required to reduce injury potential. Use gloves, safety glasses, back support belts, etc., as necessary.
- Never stand on chairs, furniture, or anything other than an approved ladder or step stool.
- Never use intoxicating beverages or controlled drugs before or during work. Prescription medication should only be used at work with your Doctor’s approval.

Access to Employee Exposure & Medical Records

Whenever an employee or designated representative requests access to a record, William Warren

Properties will assure that access is provided in a reasonable time, place, and manner. If William Warren Properties cannot reasonably provide access to the record within fifteen (15) working days, the company will within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available. Employee exposure and medical records can be obtained by contacting the Safety Manager.

Bloodborne Pathogens

Unless you have received proper bloodborne pathogen training and have at least been offered the Hepatitis B vaccination series, DO NOT touch any blood or other body fluid or material contaminated with these fluids. If you accidentally come in contact with another person's blood or body fluid immediately notify your supervisor so that you can be medically evaluated by a physician for possible exposure to bloodborne pathogens.

Injuries & Accidents

- All injuries and accidents must be reported to your supervisor immediately. This includes first aid injuries and close calls.
- First Aid injuries must be documented on the first aid log.
- Accidents and injuries resulting in medical treatment must be documented on an accident investigation form.
- Not reporting an injury or accident immediately will result in disciplinary action.
- Failure to report work related injuries and illnesses in a timely manner might result in the denial of benefits under the workers' compensation law.

Workers' Compensation Fraud

William Warren Properties is committed to every employee who receives a legitimate, work-related injury or illness. However, if an employee attempt to file a fraudulent work comp claim for injury is suspected it will be turned over to the company's Workers' Compensation insurer and the State Attorney General's Office for investigation. Workers' Compensation Fraud is a very serious crime and will be prosecuted to the fullest extent of the law. Fraud results in high Workers' Compensation insurance premiums and productivity interruption affecting the company's ability to remain competitive in the marketplace. This in turn affects all employee's job security and wages. All employees are encouraged to immediately report any suspected fraud to his/her supervisor. Complete confidentiality will be maintained.

Horse Play

Horse Play, scuffling, pranks, wrestling, or throwing material at others are not allowed under any circumstances. This type of behavior often results in injuries.

Disciplinary Action

Disregarding safety rules or established safety practices will result in immediate dismissal or at least being written up and suspended. Examples of violations:

- Not wearing required PPE
- Not immediately reporting an injury or damage
- Committing an unsafe act such as removing a guard
- Operating a piece of equipment you are not authorized to operate


Return to Work Policy

All injured employees that are returned to work with restrictions will be accommodated with a modified duty position until they can return to full capacity. Every effort will be made to return employees on medical restrictions to their normal position with modifications to meet the required medical restrictions. When it is not possible to accommodate employees at their normal position an alternative task, within the scope of the restrictions will be assigned.

OSHA'S Hazard Communication Standard

- All chemicals must be labeled with the name of the chemical & manufacturer
- Bulk chemicals and chemicals with a hazard must be labeled with the Hazard Management Information System Label shown on the next page.
- The higher the number rating the more hazardous the chemical.
- A list of hazardous materials used in the workplace is kept in the Safety Manager's office if you ever need to access it.
- Always use required and recommended PPE when working with any chemical.

Specific Hazards

- The marking in the bottom white square
- OXY - Oxidizer (causes fire through release of oxygen)
- ACID - Acid
- ALK - Alkali
- CORR - Corrosive (both CORR & ALK material create burns on human skin)
- W - Use No Water
-  Radiation Hazard

Safety Data Sheet (SDS)

- In-depth information on health hazards, reactivity, flammability chemical properties, guidelines on usage and storage.
- The SDSs are located in the office at each property. Anytime you need a SDS just ask your supervisor and he or she will get it for you.

Required PPE

- Your supervisor will inform you of the PPE required to perform your specific job safely. Safety Glasses are required to be worn at all times.
- Face shield and gloves are required when working with corrosives.
- Proper eye, face and hand protection must always be worn when operating a drill.

- Face shield, safety glasses, gloves and hearing protection is required for all grinding activities.
- Gloves are required to be worn when handling materials that might result in injury to the hand(s).
- If an injury is sustained due to failure to wear required PPE, benefits and/or compensation that may be due you under Workers' Compensation Law will be reduced to the minimum required by law, including forfeiture of benefits and/or compensation.

Care of PPE

- Inspect all PPE prior to using each time.
- If any part of your PPE is damaged see your supervisor for a replacement
- Store all PPE in a clean, dry and secure place.
- If your PPE is lost or stolen you will be charged for a replacement.

Limitations of PPE

- Dust, airborne dirt, and sparks can travel underneath and around the lens of safety glasses.
- Leather gloves can be cut through.

Eye Safety

- Never rub your face or eyes with a dirty hand or while wearing a glove.
- If you get something in your eye never rub it with your finger, this will only make it worse.
- If something is in your eye blink it several times then use an eye wash.

Lock Out Tag Out: Control of Hazardous Energy

- If you ever see a red lock, yellow lock or a danger tag on a machine it is locked out for repairs.
- Never try to start a locked out machine.
- Never remove locks or tags.
- All machines being serviced must be locked out.
- Only trained and authorized maintenance employees can lock a machine out.

Electrical Safety

- WWP employees are not authorized to conduct trouble shooting or electrical repairs.
- Do not attempt any maintenance activities you are not trained or authorized to conduct.
- Never use a damaged extension cord or any other piece of damaged equipment.
- Never used electrical equipment in damp or wet areas.

Machine Safety

- Never place hands in areas where there are moving parts or crush zones.
- Never try to operate equipment you are not familiar with or trained to operate.
- Never reach into a machine while it is operating.

Machine Guarding

- Never remove a guard from a machine
- Do not use any machines with a guard missing. Report the problem immediately to your supervisor.
- Never reach around a guard.
- Never rig or bypass a guard.

Housekeeping

- It is important not to leave lumber, scrap, or garbage on the floor.
- Items not stored correctly will cause a trip hazard.
- Water or oil on the floor will create slip hazards for employees.
- Clean up or immediately notify your supervisor of these conditions.

Lifting and Moving Material

- Always check the weight of an object prior to lifting it.
- If it seems heavy get help from another person, use a forklift or a crane.
- Stretch and plan the path of travel before the lift.
- Always lift with your legs keeping your back straight.
- Never twist while carrying a load.

Fire Procedures

- If you find a fire smaller than a small trash can you can try and put it out.
- Anything larger sound the alarm, notify your supervisor and evacuate the building.
- Assemble in a designated area outside
- Report any missing coworkers to your supervisor.

Fire Extinguishers

- Fire extinguishers only have a minute of retardant in each extinguisher.
- So you will only be able to put out fires the size of a small trashcan.
- To use a fire extinguisher Remember **PASS**
 - Pull the pin
 - Aim at the base of the fire
 - Squeeze the handle
 - Sweep the base of the fire