

Health & Safety Plan

1.0 SAFETY PROGRAM GOALS AND OBJECTIVES

The goal of Northwest Abatement's safety program is to provide quality, cost effective services to our customers at competitive prices, meeting or exceeding the regulatory requirements, and using the latest technology and care to protect the safety of our employees and the general public. Our objectives are as follows:

- Prevent accidents
- Provide a safe and healthful working environment for all employees.
- Minimize damage and severity of injury resulting from on the job accidents.
- Integrate safety planning into all company activities.
- Examine safety aspects of all new equipment purchased in support of company operations (and continual evaluation of safety aspects of existing equipment).
- Reduce insurance costs.
- Reduce operating costs and increase operational capacity by reducing damage/injury to Company personnel/equipment.
- Develop and enforce minimum standards for safe operation of Company equipment and safe procedures for Company provided services.
- Provide all employees with a method of notifying management of hazardous conditions.
- Identify and eliminate hazardous conditions.

2.0 SAFETY PLAN

2.1 INTRODUCTION

2.1.1 SAFETY AND LOSS CONTROL POLICY STATEMENT:

Northwest Abatement's management believes that our employees are our most important asset. We also recognize that occupational injuries and illness results in unnecessary human suffering, reduced employee morale, productivity, and ultimately, a waste of the Company's human and material assets.

In the interest of protecting the company, its employees, its stockholders, its customers, and the general public from losses due to accidents and other downgrading incidents, it is the policy of Northwest Abatement to do everything reasonable to prevent personal injury and damage to property and the environment. Furthermore, Northwest Abatement intends to comply with all applicable local, state, and federal regulations relative to employee Safety and Health.

We have established a safety program in each segment of business operations, including, but not limited to, construction and maintenance, shop and office operations, material handling, housekeeping, machine and tool usage, vehicular operation, fire protection, public protection and compliance with environmental regulations.

All members of the management team are responsible for the development, evaluation and implementation of Northwest Abatement's safety program. **Safety is the**

responsibility of every employee in the company, and all employees are expected to make loss prevention and control an integral part of their work ethic.

The goals of our safety and loss control program are both humanitarian and economic. These goals and the objectives of this policy can and must be achieved through the continued cooperation and support of each and every employee.

2.1.2 RESPONSIBILITIES:

1. The Executive staff is responsible for developing the safety program, evaluating the results of the program, and providing advice, direction, and guidance on the implementation of the program.

This responsibility includes the authority to publish or revise the program in the form of a Company directive and to specify internal and external safety reporting, investigation, and inspection requirements.

2. Production Managers are responsible to the safety director for implementing all aspects of the Company Safety Plan as it applies to their area of responsibility. Production Managers are responsible for the dissemination of safety plan requirements to all subordinate supervisors and foreman.

Specific requirement can be delegated to subordinates. Responsibility for all operations beneath their own level remains their responsibility.

Implementation of the Safety Plan includes responsibility for the following:

- A. **Compliance:** Effective communication and enforcement of all Company policies and procedures relative to safety.
 - B. **Inspection:** Periodic inspection of all facilities and equipment as they pertain to safety.
 - C. **Investigation:** Investigation of all accidents involving personal injury or property damage and near misses for the purpose of establishing cause, responsibility, and means of future prevention.
 - D. **Promotion:** Promoting the use of safe practices by employees in carrying out their assigned tasks.
 - E. **Evaluation:** Continuous evaluation of the safety effort and recommendations for changes and improvements.
 - F. **Dialogue:** The Safety Plan must include free discussion and open, constructive criticism concerning any matter pertaining to safety. Only by learning of existing unsafe conditions and practices can a solution be found and corrections made.
3. Supervisors/Foremen: as “key men” in the company are held just as responsible for the safety of the employees working under his/her direction as he/she is for the production of work accomplished by them. No job is so important, and no service so urgent, that time cannot be taken to perform the work in a reasonable safe manner.

When the word “Supervisor” or “Foreman” is used in this text, it refers to any NW Abatement employee who has supervisory authority over other Company employees or subcontractors at a work site, whether on or off Company premises. It is the supervisor’s duty to see that:

- A. His work is planned and analyzed in advance to determine the safe, economical method of procedure and the physical protection necessary to perform an operation. The supervisor shall be responsible for seeing that this physical protection is obtained, maintained, and used throughout the work.
- B. (I) All employees are aware of the proper safety procedures, (II) they are instructed in detail of specific procedures for the specific job.
- C. All new employees or all employees transferred or assigned to work with which they are unfamiliar are given specific instructions at the time of the assignment in the precautions to be observed in connection with their work location.
- D. The safe practice regulations of NW Abatement complied with at all time, except when compliance with a particular regulation might constitute more of a hazard. Where or when any exception is taken, the responsibility for the exception rests directly upon the supervisor.
- E. All accidents are investigated by him personally. This includes accidents occurring to or caused by an employee, piece of equipment, or motor vehicle assigned to him.

2.2 PROGRAM ELEMENTS

2.2.1 EMPLOYEE SELECTION:

1. Northwest Abatement understands that the **hiring process** is fundamental to all safety and loss control efforts. NW Abatement will strive to recruit and hire qualified persons to maintain the highest standards of employment and development of the work force.
2. Prospective employees **driving records** will be obtained before hiring if the applicant might be required to drive company vehicles in the course of their employment. No person will be hired into a driving position if he/she does not have an acceptable driving record in accordance with NW Abatement's Employee Driving Records Policy. Driving records shall be updated as necessary during the course of employment to minimize the liability exposure of high-risk drivers.
3. All applicants for employment may be asked to submit to a **pre-employment physical** which includes **screening for substance abuse**. The results of these tests will assist Company management in determining an applicant's suitability to perform required work activities. Update physicals and random screening for substance abuse may occur at anytime during the course of employment.

2.2.2 DISTRIBUTION OF SAFETY INFORMATION

1. A **tailgate on-site safety meeting** shall be conducted by the supervisor prior to and once a week on all jobs. This meeting may include a review of the work to be done, what equipment will be used, what procedures to follow, what safety equipment to wear, the location of plant emergency equipment, plant rules relative to smoking, eating, and evacuation, and any other specific instructions necessary to insure the job is performed safely. Note: On-Site Safety Checklists (may be used where practical).
2. A safety-reading **file** will be maintained by Management or their designee. This file (or binder) will include, at a minimum, this safety plan with all current additions or revisions. Special safety notices will be posted to the reading file as appropriate. Supervisory personnel should review the file as necessary to remain current on safety related matters.
3. **Bulletin boards** will be maintained by Management or their designee at the Company facility. The board should display pertinent safety directives and/or posters.

2.2.3 SAFETY EDUCATION AND TRAINING

1. Field Employees:
 - A. All new NW Abatement employees will receive an orientation and basic training on the following topics before their first job assignment, when applicable; I) NW Abatement General Safety Rules (copy issued to employees, then reviewed and discussed).
 - B. In addition, affected employees should receive training on specific safety topics, including but not limited to the following:
 - I) Respiratory Protection
 - II) Confined Space Entry
 - III) DOT Regulations (Written test and road test)
 - IV) Operation of Services Vehicles (Air movers, roll-off, etc)
 - V) Asbestos Abatement
 - C. All training will be documented in the employee's personnel file and periodic training updates will occur as necessary.
2. Supervisory and Management Personnel:
 - A. Responsible individuals will be provided with necessary training or guidance in the following: Conducting Safety Meeting, Conducting Inspections, and Accident Investigation and Reporting.

2.2.4 INSPECTIONS

1. NW Abatement will evaluate the safety program through informal and planned inspections. This evaluation is accomplished at all levels of management using inspection data collected by equipment operators, supervisors, and the managers themselves. These inspections will include reviewing job-site exposures and work procedures such as housekeeping, machine guarding, vehicle safety, personal protective equipment use, maintenance, storage, and any other area pertinent to NW Abatement's operation.
2. Production Managers are responsible for maintaining a clean and safe working environment. Periodic **facility inspections** may be conducted to identify problem areas.
3. **Unannounced spot inspections** may be made at Company work sites by Management or Executive staff. These inspections will emphasize compliance with regulatory requirements as well as Company guidelines.

2.2.5 ACCIDENT REPORTING:

1. All on the job injuries must be reported immediately to the supervisor and management. The first priority is to ensure that the injured employee receives proper medical care.
2. All personnel who drive Company vehicles must be advised that any accident involving a Company vehicle which results in damage to any vehicle or property or results in injury to NW Abatement employees or third party must be reported immediately to management.
3. Any non-vehicular accident or incident in which there is damage to non-owned property or personal injury to persons other than NW Abatement employees resulting from the conduct of NW Abatement equipment, or use of NW Abatement products or procedures must be reported as a potential general liability claim.

4. The Production Manager or his/her designee is responsible for reporting all accidents and injuries (except minor first aid cases) to the Executive staff within one working day of the incident. This report can be made by telephone. Serious accidents must be reported to the Executive staff immediately.
5. Additional documentation on accidents and injuries is required when the investigation is complete.

2.2.6 ACCIDENT/INCIDENT INVESTIGATION:

1. All accidents and near-miss incidents will be investigated by supervisory personnel and/or Company management to determine the basic cause and to recommend follow-up action to prevent recurrence. Serious accidents may also be investigated by state or federal authorities.
2. Initial investigations are normally conducted by the immediate supervisor due to his knowledge of the job and/or the individuals involved. A follow-up, in-depth investigation may be assigned to the Production Manager or a professional investigator.
3. Investigations are documented on Company-approved forms as described in the previous section.

2.2.7 RECORDKEEPING:

1. All documented inspections, investigations, safety meeting topics, training records, and injury logs will be kept in individual job files.
2. The Office Manager or his/her designee will maintain similar files for the Company. These files will be retained for at least 2 years. (OSHA 200 Reports must be kept for five years).

3.0 SAFETY GUIDELINES

3.1 GENERAL INFORMATION

3.1.1 REPORTING OF INJURIES AND CHANGE OF HEALTH STATUS:

1. **All injuries**, no matter how minor must be immediately reported to your supervisor.
2. Any employee under a doctor's care must report his current condition to the supervisor.

3.1.2 DRUG AND ALCOHOL (See Drug & Alcohol Policy for additional info)

1. Drugs and/or alcohol will not be permitted on projects.
2. All employees under the influence of a prescription drug must report the use of this drug to his immediate supervisor.

3.1.3 SMOKING

1. Smoking any Tobacco products while engaged as an asbestos worker will increase your risk of lung cancer as much as 92%. Smoking is prohibited at any time on asbestos projects.

3.1.4 EMERGENCY PHONE NUMBERS

1. In almost all of NW Abatement's operating areas, emergency services may be contacted by dialing 911 on any telephone. Supervisors/Foremen are expected to check emergency telephone numbers for local access prior to beginning each project.

3.1.5 CONDUCT

1. Horseplay, fighting, gambling, and possession of firearms will be grounds for disciplinary actions.

3.1.6 HOUSEKEEPING

1. Waste goes in designated marked containers. Work area must be cleaned up continually as the job progresses, with cords and hoses routed across the area in a manner that minimizes tripping hazards.

3.1.7 INSPECTIONS

1. A work area check is to be made daily at the beginning of each shift and at the end of each shift, to ensure safe conditions. The supervisors daily log checklist (top & bottom of page) will be completed and placed in the job and field files.

3.2 EQUIPMENT

3.2.1 SCAFFOLDS

1. Welded Metal Frame Scaffold
 - A. Casters may be used provided the following conditions are met:
 1. The scaffold is no higher than four times the base.
 2. The floor surface is smooth and clear of obstructions.
 3. All casters must be locked in place while in use.
 4. Scaffolds may not be moved while personnel or tools are on the scaffold.
 - B. All scaffolds must have full deck of approved planking. All handrails, midrails, and toe boards are to be utilized.
2. Tubular Scaffolding
 - A. Scaffolding shall have a solid foundation.
 - B. Posts shall be placed no further than 6 feet apart, by 10 feet apart along the length of the scaffold.
 - C. Cross braces shall be installed across the width of the scaffold at least every third set of posts horizontally and every fourth runner vertically.
 - D. A full deck of approved planking.
 - E. All tubular frames should be plumb.
 - F. Handrails, midrails and toe boards shall be utilized.

3.2.2 LADDERS

1. General Information
 - A. Inspection by user prior to each use.

- B. While ascending or descending a ladder, carry nothing which will prevent holding on with both hands.
 - C. Always face the ladder.
2. Straight and Extension Ladders
- A. Place ladder so the base is out one-fourth the vertical distance from the ground.
 - B. Must be adequately tied off.
 - C. Extension ladder sections are not to be used separately.
3. Stepladders
- A. Must be set level on all four feet, with spreader locked in place. Do not use as a straight ladder.
 - B. Never stand on top of a stepladder.
 - C. Must be tied off when used close to the edge of a floor opening.
 - D. Always ascend or descend on ladder rungs not on back supports.
 - E. Do not "walk" ladders in order to move them. Climb down and move the ladder properly.

3.3 ELECTRICAL

3.3.1 GENERAL INFORMATION (See GFCI section of submittal)

1. Proper support of light fixtures during the abatement should be assured. Safe removal of light fixtures as an alternate should also be considered.
2. Equipment, light fixtures, dangling wires, temporary lighting and all extension cords should be checked daily for potential shock hazards.
3. Heavy gauge extension cords with runs of 100 feet or less should be used whenever possible.
4. Ground Fault Interrupters will be used on every electrical cord entering the work area.
5. Do not allow quantities of water to puddle on floor.

3.4 FIRE PROTECTION

1. Minimum of two fire extinguishers shall be placed within easy access of the shower exit and clearly marked.
2. Flammable material shall be stored away from fire or flame.
3. Smoking will not be permitted on project premises.

4.0 GENERAL SAFETY RULES

4.1 INTENT:

To establish general safety rules and procedures designed to protect employees, Company property, customers, and the general public. These rules are not intended to address any specific operation. Safety rules for specific or specialized Company operations are addressed on an individual basis.

4.2 ACCOUNTABILITY:

All management and supervisory personnel are responsible and accountable for the effective communication and enforcement of these safety rules. Employee should understand that these rules do not cover all situations, and additional rules or variations of these rules may be required under certain circumstances. The application of the information contained herein must be made by the individual employee in accordance with his judgment based on the conditions affecting the work concerned. Good judgment must prevail at all times.

4.3 RULES SUMMARY:

4.3.1 ALL EMPLOYEES ARE EXPECTED TO:

- A. Comply with all specific safety instructions, operating procedures, posted signs, instructions given by your Supervisor, customers, safety rules, and rules listed below, as applicable.
- B. Operate vehicles, equipment, or power tools only when authorized qualified to do so.
- C. Obey all prevailing local, state, and federal traffic laws and regulations while operating any vehicle on Company property, in customer's plants, and on public streets and highways.
- D. Wear the personal protective equipment prescribed by posted signs, established operating procedures, written instructions, work permits, and rules listed below. Also, you are required to wear any additional equipment specified by your Supervisor of the customer's Safety Department for a particular job.
- E. Know the location and proper use of fire extinguishers, safety showers, eyewash stations, and other equipment in your work area.
- F. Smoke only when permitted to do so by NW Abatement policy or prevailing customer plant rules, etc. If smoking is permitted, smoke only in designated smoking areas at designated times. Be sure to check with your supervisor or plant personnel before carrying matches or lighters into any plant.
- G. Clean up your work area after other work is completed. No job is complete until the area is clear of parts, tools, spilled product, and other debris.
- H. Use a common sense approach to any potentially hazardous job. Any questions or comments concerning safety practices or specific unsafe conditions should be directed to your supervisor or management.

If conditions arise which make it unsafe to proceed with your assigned job, stop and immediately notify your on-site supervisor.

- I. Actively participate in 'tailgate' safety meetings at the job site and regularly scheduled safety meetings at your location.

4.3.2 EMPLOYEE CONDUCT:

Employees are expected to conduct themselves in a civilized, orderly manner while on Company property. Employees who are "on the clock" are prohibited from engaging in the following activities:

- 1. Fighting, horseplay, or other disruptive activities.
- 2. Possessing or brandishing a firearm.
- 3. Willful or negligent destruction of property.
- 4. Theft of; property belonging to NW Abatement, customers, or other employees.

5. Neglect of duty (including leaving post of duty without cause or permission and sleeping on duty).

4.3.3 SUBSTANCE ABUSE:

Employees are prohibited from the following:

- A. Possessing, consuming, dispensing, selling, or reporting to work under the influence of illegal drugs or other illegal substances on Company premises or at location while acting in the course and scope of employment.
- B. Possessing, consuming, dispensing or selling legally prescribed drugs, mind-altering over the counter drugs, or alcohol during working hours without proper authorization.
- C. Reporting for duty, working, or driving a Company vehicle in a noticeably impaired state due to consumption of alcohol or any drug or mind-altering substance, whether legal or illegal.

4.3.4 INJURY REPORTING:

- A. All on the job injuries must be reported promptly to your supervisor or, if you are working alone, to the Production Manager or other management representative.
- B. If treatment other than minor first aid is indicated or if you become aware of a job related injury after leaving work, notify the Production Manager or appropriate member of the management team, and a determination will be made regarding appropriate medical care.

4.3.5 VEHICLE SAFETY:

- A. Only qualified, authorized personnel shall operate any Company vehicle.
- B. All vehicles shall be driven in a careful, cautious, and courteous manner with full consideration of prevailing traffic conditions, weather conditions, posted signs, and established local, state, and federal traffic laws and regulations.
- C. Drivers shall check their assigned vehicle before leaving the yard. Any defect that may cause an accident, injury, or damage to the equipment itself, or that may interfere with the proper function of the equipment at the job site must be reported to the Project Manager or other management representative immediately.
- D. Drivers are responsible for the safety of any person riding in or on their vehicle. There shall be no riders on equipment not designed to carry passengers.
- E. No person other than NW Abatement employees or persons on official business shall be allowed to ride in any Company service vehicle. No more than three persons may ride in the cab of a truck. Passengers on the back of trucks must keep all parts of their body inside the bed of the truck.
- F. All NW Abatement employees are required to wear seat belts while driving or riding in any Company vehicle equipped with seat belts.
- G. No NW Abatement service vehicle shall be used to push, tow, or otherwise move a private vehicle.
- H. Drivers shall proceed to and from their assigned job using major streets and highways or a route specified by Management. Side trips and unauthorized stops along the way are strictly prohibited.
- I. Drivers shall not leave any vehicle unattended unless the engine is off, and the vehicle is safely and securely parked.
- J. Vehicle engines shall not be started or allowed to run while refueling or while exposed to potentially flammable vapors.

- K. Drivers are responsible for storing equipment, tools, and other materials in an orderly fashion on the vehicle. Loads shall be secured to avoid shifting or falling.
- L. Any load extending beyond the normal width or length of the vehicle shall be appropriately marked with warning signs or flags. No load shall be carried which completely obscures the driver's vision in any direction.
- M. Any vehicular accident involving injury to a person or damage to any vehicle, material, or property shall be reported immediately to Management.

4.3.6 HOUSEKEEPING:

- A. Housekeeping is the responsibility of every NW Abatement employee. No job is complete until the work area is adequately cleaned up.
- B. All trash and scrap material shall be placed in proper containers promptly.
- C. Emergency equipment and building exits must be accessible at all times.
- D. All tools shall be returned to proper storage areas or toolboxes after use.
- E. Work areas, vehicle, and change houses must be kept clean. Personal clothing and materials shall be stored in lockers, if provided for the purpose. Company tools and materials shall be stored in lockers, if provided for the purpose. Company tools and materials shall not be stored in employee's lockers or personal baggage.

4.3.7 HAND TOOLS AND POWER TOOLS:

- A. All employees are expected to know and use the proper tool for the job at hand. If you are not sure, ask your supervisor.
- B. All tools shall be inspected before use. Any defective tool shall be removed from services and brought to the attention of your supervisor.
- C. Guards on power tools, such as grinders (either portable or fixed), shall not be removed for any reason.
- D. Power impact tools shall not be operated unless the retainer ring and/or pin is in place and the head is against a solid object to prevent the head from being thrown off.
- E. Pneumatic tools shall never be connected to anything, but a plant air source or portable air compressor. **Always** check with plant personnel before connecting any tool to an energy source.

4.3.8 OVERHEAD WORK:

- A. A ladder or scaffolding shall be used when the work to be done cannot be performed without reaching overhead.
- B. No material shall be thrown or dropped from elevated places unless the area is properly barricaded and clearly marked to warn personnel who may be in the area.
- C. No tools or other materials shall be carried by hand when climbing a ladder. A tag line shall be used to raise tools and other materials to elevated places.
- D. When working in elevated locations, all tools and machinery shall be placed and/or secured so that such equipment will not fall or present a tripping hazard.
- E. Safety harnesses and life lines shall be used when working in elevated locations where scaffolds and platforms equipped with guardrails are not feasible or practical.
- F. Straight or extension ladders shall be securely lashed near the point of support to prevent the ladder from swaying or falling. (Someone must secure the ladder by hand while this is being done).
- G. Ladders shall not extend more than three feet beyond the point of support.

4.4 PERSONAL/PROTECTIVE CLOTHING AND EQUIPMENT:

4.4.1 GENERAL:

- A. All personnel shall dress suitably for the work in which they are routinely engaged. Loose clothing shall not be worn near moving machinery. Metal jewelry shall not be worn near live electrical systems.
- B. Employees will not be allowed to work without a shirt or in a sleeveless shirt. All personnel should wear sleeve shirts with the cuffs buttoned while working in customer plants.
- C. Industrial safety glasses shall be worn at all times as minimum eye protection by NW Abatement employees at all job sites. Industrial safety glasses with tinted lenses may be worn on Company property or if allowed by prevailing plant rules. However, tinted lenses shall not be worn after dark or inside vessels.
- D. Tennis shoes, slippers, sandals, and any soft-soles shoes shall not be worn by service personnel "on the clock". Company approved boots are recommended as standard footwear.
- E. Never begin work on any line, vessel, or other equipment unless you are sure what service it is in and what protective clothing and equipment are necessary. Read the Job Scope Report carefully and consult with plant personnel or Management if you have any questions.