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Message From Management

Welcome, we are glad to have you join Milestone. Thank you for this opportunity to introduce you to Milestone Contractors, ("Milestone"). There are some things that you need to understand about us. We believe that Milestone Contractors is not just another Construction company. We are a customer service company. Serving the customer is what we are about; construction is the service we provide. You are very important in this process. You are now a representative of Milestone Contractors; the way you do your job and treat our customers is what people will think of Milestone Contractors. We request that you treat them with respect and courtesy, as they are the only reason we exist.

We also believe that we are not just a construction company and that you are not just a construction worker. We are construction professionals. Be proud of what you do, who you do it for, and respectful of those you work with. Pride and happiness go together, and we want you to find happiness and rewards in your efforts.

We are committed to your safety and the safety of everyone around you. Remember this every day, all day long, and look out for yourself, your fellow workers, and the public.

We look forward to a long and rewarding experience together.

Our Beliefs

Milestone Contractors is committed to the following Mission, Values and Goals

MISSION

Milestone Contractors is committed to delivering our products and services with safety, quality, and customer service for the benefit of our customers, employees, and investors.

VALUES

We will not compromise Safety, Quality, Integrity, or the Environment. Mutual trust and respect are the foundation of Customer Service. We develop creative solutions to increase value for our customers. Continuous process improvement is key to our success. We are dedicated and work hard for each other and our customers. We support and participate in our communities.

GOALS

Safety – Zero Injuries
Quality
Customer Service
Low-Cost Producer
Growth
Fun at work

The Work We Do

We perform all phases of highway, heavy highway, and site development projects, which are mutually beneficial to our employees and customers.

Milestone conducts business primarily within the State of Indiana. We are pre-qualified with the Indiana Department of Transportation and the Departments of Transportation in the States of Kentucky, Ohio, and Illinois.

We are interested in all phases of site development. They include earthwork, storm drainage, sanitary sewer, water systems, asphalt paving, concrete paving, miscellaneous concrete, bridge construction, and structural concrete. Our greatest strength is our ability to perform complex projects within a tight time frame and deliver a quality product on time.

We are able to perform as either the general contractor – working directly for the owner – or as a site development subcontractor on any project. We perform projects as small as residential driveways to the largest interstate reconstruction projects.

We have offices located in Indianapolis, Bloomington, Columbus, Lafayette, Richmond, Portland, Griffith, South Bend and Terre Haute, Indiana. We operate numerous asphalt plants strategically located in our market areas.

The Quality Of Our Work

Quality encompasses a variety of objectives with each working toward a safer, more efficient, and profitable company. With these objectives in mind, senior management has focused our efforts on continuous improvement. As an organization, we create a climate in which we continuously improve on our ability to deliver high-quality products and services to customers. This means we are always looking for opportunities to do things better.

An important part of continuous improvement is thinking in terms of “Best Practices and Processes”. Increased quality comes from the systematic analysis and improvement of work processes. When we take our complex jobs and break them down into the steps that are involved, it is easy to see that problems or mistakes can often be prevented.

Another critical aspect of continuous improvement is a focus on the human side of business and Milestone’s responsibilities to all employees. This includes providing a safe, healthy, and rewarding work experience and environment. It also means developing employees for success in their current positions while planning for all employees’ future roles and responsibilities as Milestone continues to grow. This is done through strong leadership, mentoring, and both in-house and external training.

As we plan for the continued growth and future of Milestone, it is important that we develop a process that is efficient and controlled. To remain successful, Milestone must remain innovative in the way we conduct business. We are challenged to continually change and improve the way we do things to keep our internal cost as low as possible while staying as far ahead of our competition as possible.

As Milestone, we recognize that every employee has significant potential to make improvements, thus any employee may request or suggest a change to any current process. In this effort, we promote employee participation along with Milestone’s 6 basic goals.

All Milestone’s work duties shall be carried out based on the process or procedure for that specific work task in accordance with your specific discipline of work.

Disclaimer For Unionized Employees Covered By A Collective Bargaining Agreement

The employment terms set out in this Handbook work in conjunction with, and do not replace, amend, or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with Milestone. Employees should consult the terms of their collective bargaining agreement. Wherever employment terms in this Handbook differ from the terms expressed in the applicable collective bargaining agreement with Milestone, employees should refer to the specific terms of the collective bargaining agreement, which will control.

Communication

Any successful company depends on its employees' effectiveness in communicating both internally with other colleagues, as well as externally with customers, subcontractors, owners, and other stakeholders. We rely on accurate information to complete our work and accurate information depends on effective communications.

Effective communication requires diligence and vigilance, especially when our jobsites cover so much distance. All employees are expected to actively communicate because when any of us fail to do so, our entire system suffers.

We have several different tools that we use to keep you informed that include, but are not limited to:

- Office and job site bulletin boards
- Payroll stuffers
- Newsletters or bulletins
- Mailings to your home
- Memos, both print and electronic
- E-mail
- Social Media - including our website, Facebook page, and Twitter feed.

At-Will Employment

Employment with Milestone is at-will and entered into voluntarily, which means that any employee is free to resign at any time, for any reason, with or without notice. Similarly, Milestone is free to terminate the employment relationship at any time, for any reason, with or without notice. No one has authority to alter the at-will relationship, other than in writing signed by the COO.

Note: This policy does not supersede any applicable collective bargaining agreement.

Changes In Employee Information

To ensure accuracy of records, it is the responsibility of each employee to promptly notify the HR Department of any changes in name, address, e-mail, telephone number, person to notify in case of emergency and educational accomplishments. If relevant to a benefit plan, employees should notify the HR Department of any change in marital status and number and names of dependents.

Equal Employment Opportunity Policy

Milestone Contractors is an equal opportunity employer. Milestone Contractors prohibits discrimination and harassment of any type and affords equal employment opportunities to employees and applicants without attention to race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law. The corporation is committed to this policy by our status as a Federal Government contractor. We are far more strongly bound to the policy by the fact that adherence to the principles involved is the only acceptable American way of life. Therefore, it is the policy of this corporation to assure that applicants are employed, and that employees are treated during employment without regard to race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law. Such action shall include employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; training and participation in Milestone sponsored benefits or programs; and selection for training, including apprenticeship, pre-apprenticeship, and/or on-the-job training.

The successful achievement of a nondiscriminatory employment program requires a maximum of cooperation between management and employees. In fulfilling its' part in this cooperative effort, management is obliged to lead the way by establishing and implementing affirmative procedures and practices, which will ensure our objective, namely equitable employment opportunity for all. (Minority and female employees are encouraged to participate in all Milestone activities and refer applicants.)

Margaret Garner has been designated the EEO Officer of Milestone, with responsibility to direct the establishment of and to monitor the implementation of personnel procedures to guide our affirmative action program. This official is charged with designing and implementing audit and reporting systems that will keep management informed on a regular basis of the status of equal employment opportunity and affirmative action. She can be reached at (317) 616-4937.

Supervision has been made to understand that their work performance is being evaluated based on their equal employment opportunity efforts and results, as well as other criteria. It shall be a responsibility of the supervision to take actions to prevent harassment of employees placed through affirmative action efforts.

We shall comply with the Civic Rights Act of 1964, as amended, the Federal Highway Act of 1968, the Executive Order #11246 and #11375, the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended, the Indiana Civil Rights Act and other Federal and State Laws and regulations pertaining to equality of Opportunities and Affirmative Action policies. We have developed an Affirmative Action Program for Veterans and Individuals with Disabilities.

Unlawful Harassment Policy

Milestone Contractors is committed to creating and maintaining a work environment where people are treated with dignity, decency, and respect, free of discrimination and unlawful harassment, including unlawfully intimidating, hostile, or offensive conduct. The accomplishment of this goal is essential to our mission. For that reason, we will not tolerate unlawful discrimination or harassment of any kind. We maintain a strict policy prohibiting unlawful harassment because of race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other basis protected by federal, state or local law, ordinance or regulations. Through enforcement of this policy and by education of our employees, we seek to prevent, correct, and discipline behavior that violates this policy.

Milestone's anti-harassment policy applies to all persons involved in the operations of Milestone and prohibits unlawful harassment by any employee of Milestone. All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include termination of employment, even on the first offense. Unlawful harassment in any form, including verbal, physical and visual contact, threats, demands and retaliation, is prohibited. Voice mail and electronic communications (such as e-mail and Internet use) are covered by this policy in the same manner as other communications and actions.

Prohibited Conduct Under This Policy

Harassment - Milestone Contractors prohibits harassment, including sexual harassment, of any kind, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For the purpose of this policy, prohibited conduct includes verbal, written, visual, or physical conduct that (1) relates to another person's race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law or (2) is directed toward another person because of that person's race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law, where such conduct may have

the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

- Prohibited conduct may include, among other things, telling racist or sexist jokes or making offensive or derogatory remarks about another person's race, color, religion, national origin, sex, gender identity, sexual orientation, disability, age, genetic information, or any other status protected by applicable law. Prohibited conduct includes, among other things, sexual harassment as discussed below.
- Prohibited conduct includes, but is not limited to, conduct that may constitute or lead to sexual harassment, such as: use of suggestive sexual comments, jokes, or innuendo; persistent, unwanted flirtation or invitations for dates or other social activities; unwelcome sexual advances or passes; sexual remarks or questions about a person's body, clothing, or sexual activities; patting, pinching, or other offensive touching; or displays of sexually suggestive pictures or objects. Sexually harassing conduct may include conduct between persons of the same gender, regardless of the sexual orientation of those persons.
- Discrimination and harassment are prohibited whether it is committed by supervisors, co-workers, or non-employees, including vendors, suppliers, sub-contractors, haulers. Employees must not engage in prohibited conduct against other Milestone employees or personnel of Milestone's vendors, suppliers, customers, sub-contractors, or members of the traveling public.
- The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:
 - Verbal harassment: includes comments that are offensive or unwelcome regarding a person's race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law, including epithets, slurs, and negative stereotyping.
 - Nonverbal harassment: includes distribution, display, or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law.

Sexual Harassment - According to the Equal Employment Opportunity Commission (EEOC), sexual harassment is defined as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to or rejection of such conduct is used as the basis for employment decisions or such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.

- There are two types of sexual harassment:
 - "Quid pro quo" harassment: where submission to harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances. Therefore, only someone in a supervisory capacity (with the authority to grant such benefits) can engage in quid pro quo harassment. Examples: A supervisor promising an employee a raise if she goes on a date with him; a manager telling an employee she will fire him if he does not have sex with her.
 - "Hostile work environment": where the harassment creates an offensive and unpleasant working environment. A hostile work environment can be created by anyone in the work environment, whether it is supervisors, other employees, or customers. Hostile environment harassment consists of verbiage of a sexual nature, unwelcome sexual materials, or even unwelcome physical contact as a regular part of the work environment. Texts, e-mails, cartoons, or posters of a sexual nature; vulgar or lewd comments or jokes; or unwanted touching all fall into this category.
- Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:
 - Is made explicitly or implicitly a term or condition of employment.
 - Is used as a basis for an employment decision.
 - Unreasonably interferes with an employee's work performance or creates an intimidating, hostile, or otherwise offensive environment.

- Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:
 - Verbal sexual harassment- includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks, and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or “kidding” that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
 - Nonverbal sexual harassment: includes the distribution, display, or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters and notes, facsimiles, e-mail, photos, text messages, tweets and internet postings; or other form of communication that is sexual in nature and offensive.
 - Physical sexual harassment- includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing and fondling, and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, non-coercive, consented interactions between employees, that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

Retaliation - No hardship, loss, benefit, or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.
- Retaliation or attempted retaliation in response to lodging a complaint or invoking the complaint process is a violation of this policy. Any person who is found to have violated this aspect of the policy will be subject to sanctions up to and including termination of employment.
- Milestone will not retaliate or take any form of reprisal against any victim of or witness to discrimination or harassment, and any such retaliation or reprisal by a Milestone employee is forbidden. Any employee who retaliates against another employee or witness because of a complaint of discrimination or harassment, or because of participation in any investigation, will be subject to discipline, up to and including termination of employment.

Complaint Process - Milestone Contractors will courteously treat any person who invokes this complaint procedure, and Milestone will handle all complaints swiftly and confidentially to the extent possible, considering the need to take appropriate corrective action. Lodging a complaint will in no way be used against the employee or have an adverse impact on the individual’s employment status. Because of the damaging nature of harassment to the victims and to the entire workforce, aggrieved employees are strongly urged to use this procedure; however, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Confidentiality - During the complaint process, the confidentiality of the information received, the privacy of the individuals involved, and the wishes of the complaining person will be protected to as great a degree as is legally possible. The expressed wishes of the complaining person for confidentiality will be considered in the context of Milestone’s legal obligation to act on the charge and the right of the charged party to obtain information. In most cases, however, confidentiality will be strictly maintained by Milestone and those involved in the investigation. In addition, any notes or documents written by or received by the person(s) conducting the investigation will be kept confidential to the extent possible and according to any existing state or federal law.

Milestone Contractors encourages all employees to report any incidents of harassment prohibited by this policy to the EEO Officer immediately so that complaints can be quickly and fairly resolved. See the “Employee Concerns or Complaints” policy below for more detail.

Supervisors who become aware of any incidents or alleged incidents of possible discrimination or harassment must immediately report them directly to the HR Department. Supervisors who receive

complaints of possible discrimination or harassment must consult with the HR Department before undertaking an investigation or other action. Any supervisor who fails to report allegations of discrimination, harassment, or other prohibited conduct or who otherwise fails to deal properly with such allegations may be subject to discipline, up to and including termination of employment.

Milestone will take prompt action to investigate allegations of discrimination or harassment. Based upon its investigation, Milestone will take prompt and appropriate corrective action. Any employee found to have engaged in discrimination, harassment, or other prohibited conduct will be subject to appropriate discipline or other corrective action, up to and including termination of employment. Appropriate steps will also be taken if any non-employee, such as a vendor, supplier, customer, or sub-contractor is found to have discriminated against or harassed any employee of Milestone.

Employee Concerns Or Complaints

Any individual who believes that he/she as a member of a protected class, has been discriminated against based on race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law, or Limited English Proficiency in violation of the Civil Rights Act of 1964, as amended and its related statutes, regulations and directives, Section 504 of the Vocational Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, as amended, the Civil Rights Restoration Act of 1987, as amended, and any other federal nondiscrimination statute may submit a complaint. A complaint may also be submitted by a representative on behalf of such a person.

It is our policy to conduct a prompt and impartial investigation of all allegations of discrimination and to take prompt corrective action when a claim has been substantiated. No one shall intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because the individual filed a complaint or participated in the investigation of a complaint. Any individual alleging such harassment or intimidation may submit a complaint by following the procedure below.

Any individual who becomes aware of suspected discrimination based on protected status or feels he/she has been discriminated against may submit a written or verbal complaint. The complaint may be communicated to any Milestone supervisor or the EEO Officer. The complaint should be submitted in a reasonable amount of time, but within 180 days of the alleged discrimination. The individual may be requested to submit his/her account of the situation in writing. If necessary, we will gladly assist the individual.

The complaint should include the name, address, and telephone number of the individual filing the complaint and a brief description of the alleged discriminatory conduct including the date(s) of the conduct. It should also include any additional relevant evidence, including names of witnesses and supporting documentation.

Complaints should be directed to:

Margaret Garner, EEO Officer

P.O. Box 421459

Indianapolis, IN 46242

317-616-4937

MGarner@milestonelp.com

Within 60 days of the receipt of the complaint, a prompt and impartial investigation of the allegation based on the information provided will be conducted. A written report of the findings will be issued to the individual filing the complaint. We will strive to obtain an informal voluntary resolution to all complaints at the lowest level possible.

All complaints shall be kept confidential. The identity of the complainant shall be kept confidential except to the extent necessary to conduct the investigation.

Any individual who feels he/she has been discriminated against also has the right to file a formal complaint with any government agency (see list below) and/or seek private counsel for any complaint alleging discrimination, including the Indiana Department of Transportation, the Indiana District EEO Office, or the Indiana Civil Rights Commission.

Title VI OF THE CIVIL RIGHTS ACT

Title VI of the Civil Rights Act deals with nondiscrimination in federally assisted programs and activities and has broad applicability. It does not cover claims of employment discrimination except in instances where the primary objective of the financial assistance is to provide employment for the service, benefit, or program. Subsequent laws and executive orders have expanded the categories to now include race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law, income status, Limited English Proficiency, and veteran's status. The Americans with Disability Act (ADA) is also included, therefore, those with disabilities are also protected under Title VI.

Statement:

- No person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance on the grounds of race, color, age, sex, disability, national origin, income status, ancestry, or religion.

Purpose:

- To eliminate discrimination in federally funded programs and activities
- To ensure equitable distribution of public funds for public benefits

Sub-recipient:

- Includes: Metropolitan Planning Organizations, counties, cities, townships, colleges, universities, consultants, subcontractors, and contractors.

As a sub recipient, Milestone Contractors shall implement compliance with Title VI of the Civil Rights Act of 1964 (Title VI) and related statutes and regulations. Responsibility to include:

- Submit an assurance that our programs, activities, and facilities will be operated in a nondiscriminatory manner;
- Disseminate Title VI information to its beneficiaries and stakeholders (i.e. employees, general public and subcontractors);
- Ensure Title VI provisions are in federally funded related contracts extended to subcontractors;
- Not discriminate in our programs, activities or employment practices;
- Cooperate in obtaining voluntary compliance under Title VI; and
- Extend subcontracting opportunities to DBE's.

Americans With Disabilities Act

Milestone complies with the Americans with Disabilities Act and other applicable laws prohibiting discrimination in employment against qualified individuals with disabilities. To the extent required by applicable law, Milestone will make reasonable accommodations for qualified employees with known disabilities. If an employee needs a reasonable accommodation, contact the HR Department. The HR Department will work with the appropriate supervisor(s) to review the request and evaluate possible accommodations. Milestone will not retaliate against any employee for requesting or obtaining any reasonable accommodation in accordance with applicable law.

Workplace Violence Policy

Milestone is committed to providing a safe and violence-free workplace for our employees, as well as our vendors, subcontractors, customers, or other visitors to our offices or jobsites.

To maintain a safe workplace, Milestone prohibits the possession of firearms or other weapons, violence, and any type of violent or threatening behavior towards employees, sub-contractors, suppliers, vendors, or members of the traveling public, at any time while on or using Milestone property, during working hours or after hours, or while an employee is engaged in Milestone business regardless of the employee's location. All temporary employees, sub-contractors, vendors, and visitors of any type are also prohibited from carrying firearms or other weapons on Milestone premises.

For purposes of this policy, "violent behavior" includes, but is not limited to, any physical touching that is intended to or does inflict injury on another, including but not limited to the use of a weapon against another individual. Violent behavior also includes, but is not limited to, stalking, or intimidating a person, making physical or verbal threats, and intentionally destroying Milestone property or property of another individual affiliated with Milestone.

"Milestone property" includes, but not limited to desks, offices, workstations, file cabinets, e-mail and voice mail, facilities, buildings, structures, and motor vehicles, whether owned, leased, or used by Milestone. Milestone property is intended to apply to all work locations and sites in which Milestone does business and transportation between such locations while in the course and scope or employment for Milestone, except where firearms are allowed by law in parking facilities or parking areas.

Employees should report the following incidents immediately to a member of senior management:

- Any suspicious activity or unauthorized persons in the building or parking lot.
- Anyone in possession of a firearm or other weapon while on Milestone property.
- Possession by an employee of a firearm or other weapon while engaged in Milestone business regardless of whether he or she is on Milestone property.
- Any threatened or actual violent behavior by or against an employee while on Milestone property or while engaged in Milestone business.
- Any threat of violent behavior made known to an employee when off Milestone property and not engaged in Milestone business, if there is reason to believe that the threat may be carried out on Milestone property or while the employee or person making the threat is engaged in Milestone business.
- Any other incident the employee finds threatening or believes might lead to a violent altercation while on Milestone property or while engaged in Milestone business.

Any employee who feels that he or she is in imminent danger of being harmed should dial 911 if the situation warrants.

Nothing in this policy is intended to alter or infringe an employee's rights afforded under applicable state or local law.

Prohibited Conduct - We do not tolerate any type of workplace violence committed by or against our employees. The following list of behaviors provides examples of conduct prohibited by this policy:

- Causing physical injury to another person
- Making threats, threatening remarks, or threatening gestures
- Displaying aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress
- Intentionally damaging employer property or property of another employee
- Possessing any weapon, including firearms, anywhere inside the workplace, including job sites, offices, buildings, plants, trailers, or vehicles; or while conducting Milestone business
- Possessing an illegal firearm anywhere on Milestone property
- Possessing a firearm in a personal vehicle on Milestone property that is unsecured or unlocked
- Committing acts motivated by, or related to, harassment, sexual harassment, or domestic violence

Reporting Procedures - Any potentially dangerous situation must be reported to a supervisor or the HR Department immediately. Reports can be made anonymously, and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately, and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled, and the results of investigations will be discussed with them.

- Milestone will actively intervene at any indication of a possibly hostile or violent situation, which may include notifying the proper authorities.
- No existing Milestone policy, practice, or procedures should be interpreted to prohibit decisions designed to prevent a threat from being carried out, a violent act from occurring, or threatening situation from developing.

Risk Reduction - Although Milestone does not expect employees to be skilled at identifying potentially dangerous persons, employees are expected to exercise good judgment and to inform their supervisor, HR or safety department if any employee or visitor exhibits behavior that could be a sign of a potentially dangerous situation. Such behavior includes:

- Bringing weapons inside the workplace
- Displaying overt signs of extreme stress, resentment hostility or anger
- Making threatening remarks
- Showing sudden or significant deterioration of performance
- Making statements about harming themselves or others

Documentation - It is critical that any information relevant to an activity, situation, incident, or any behavior of workplace violence be forwarded Human Resources as soon as practicable.

Media Communications - The appropriate Officer of Milestone Contractors shall handle all communications with the press and other news media about a violent workplace incident.

Protective or Restraining Orders - All individuals who apply for or obtain a protective or restraining order which list any Milestone Contractors facility as a protected area or names a Milestone Contractors employee as a protected individual, must provide Human Resources with a copy of any such orders. The information will be held in confidence to the fullest extent possible; and only shared with personnel necessary to ensure the safety of the named individuals.

Dangerous/Emergency Situations - Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual. If a supervisor, or appropriate law enforcement, can be safely notified of the need for assistance without endangering the safety of the employee or others, such notice should be given. Otherwise, employees should cooperate and follow instructions.

Employee Assistance Program (EAP) - Employees who find themselves in stressful situations are encouraged to seek confidential assistance through the Employee Assistance Program (EAP). Through the EAP, medical/behavioral health professionals are available 24 hours a day/ 7 days per week.

Enforcement - Threats, threatening conduct, or any other acts of aggression or violence in the workplace will not be tolerated. Any employee determined to have committed such acts will be subject to disciplinary action, up to and including termination. Nonemployees engaged in violent acts on Milestone premises will be reported to the proper authorities and fully prosecuted.

Compensation

Work Week And Pay Periods

Milestone's work week for payroll record-keeping purposes commences at 12:01 a.m. on Monday and ends the following Sunday at midnight. Payroll checks will be issued weekly for hourly/non-exempt employees and semi-monthly for non-exempt employees. If a pay day falls on a holiday, checks will be distributed on the previous workday.

Employee Classifications

Milestone is committed to complying with all wage and hour laws and regulations with respect to exempt and non-exempt employees. All Milestone policies, including the policies in the Handbook and any Supplement, will be interpreted and administered consistent with the requirements of applicable law. In the event of any ambiguity or any inconsistency between the Handbook or Supplements and applicable law, applicable law controls.

Any employee who has questions regarding any aspect of payroll administration or believes that he or she has been improperly classified, that an improper deduction has been made to his or her salary, or that he or she has been otherwise improperly compensated, should immediately notify the HR Department. Milestone will promptly review and investigate the complaint and will reimburse any employee found to have been subjected to improper classification, improper salary deduction or otherwise improperly compensated.

Classification

For payroll purposes, employees are classified as exempt or non-exempt under applicable law. Exempt employees are generally paid on a salary basis. Non-exempt employees are generally paid on an hourly basis.

Timekeeping and Overtime for Non-exempt Employees

All non-exempt employees are required to accurately record their time worked through their designated time keeping system. Non-exempt employees must exercise care to complete their time records accurately. Falsifying time records or working "off the clock" is strictly prohibited. An employee who submits inaccurate time entries or otherwise tampers with time records will be subject to discipline, up to and including termination of employment.

Non-exempt employees are entitled to overtime pay for all hours worked in excess of 40 hours in a work week. Non-exempt employees must not work overtime unless authorized in advance by their supervisor. Any employee who works unauthorized overtime must accurately record any overtime hours worked and will be paid for such time but may be subject to discipline for failing to secure the required advance authorization. No supervisor or other employee has the authority to direct or approve "off the clock" work. Any employee who is asked not to record time worked, including overtime, must promptly report the request to the HR Department.

Salary for Exempt Employees

Exempt employees are generally paid a fixed salary for their job responsibilities, without regard to the number of hours needed in a work week to complete the job. Exempt employees are not eligible for overtime pay but are required to spend whatever hours are necessary to fulfill their job responsibilities. Similarly, regardless of variations in the number of days or hours worked or the quality of the work performed, Milestone will not make deductions from an exempt employee's salary for any work week in which the employee worked, unless such deductions are authorized by applicable law.

Pay Transparency Nondiscrimination Provision

Milestone will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Milestone's legal duty to furnish information.

Leaves Of Absence

To apply for any leave offered by Milestone, employees should contact their supervisor or The HR Department. Employees who apply for a leave will be asked to state why they want the leave, when they want the leave to begin and when they want the leave to end. Milestone will inform employees what type and duration of leave, if any, has been approved and will also tell them what requirements, such as certification of a health condition, they must fulfill.

All leaves are granted for a specific period of time. Any employee who foresees being unable or unwilling to return to work at the end of the leave period should apply for any other leave for which he or she may be eligible, including an extension of the current leave. Employees who do not return to work at the end of an approved leave period, including any extensions, may be terminated as of the date the leave ends.

Leaves of absence or other time off is governed by various laws and Milestone will comply with applicable law. Employees who need time off that is in addition to or is not covered under the

provisions of this Handbook or any Supplement should contact the HR department to determine whether any other type of leave is available at their work location.

Military Leave

Milestone complies with the Uniform Services Employment and Reemployment Rights Act (USERRA) and applicable state law pertaining to military leave. Employees who are required to fulfill military obligations in any branch of the Armed Forces of the United States or in state military service will be given the necessary time off and reinstated in accordance with applicable law. Accrued vacation may be used for this leave if the employee chooses. Military orders should be presented to Human Resources and arrangements for leave made as early as possible before departure. Employees must notify Human Resources of their intent to return to employment as required by applicable law. No attempt is made in this policy to cover all possible situations and circumstances that may arise in connection with the military service of an employee. Therefore, as military leave situations arise, employees should consult with Human Resources for complete details regarding their military leave rights.

Family And Medical Leave

Milestone Contractors will provide Family and Medical Leave to its eligible employees. The function of this policy is to provide employees with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law.

General Provisions - Under this policy, Milestone will grant up to 12 weeks (or up to 26 weeks of military caregiver leave to care for a covered service member with a serious injury or illness) during a 12-month period to eligible employees. The leave may be paid, unpaid or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy.

Eligibility - To qualify to take family or medical leave under this policy, the employee must meet all the following conditions:

- Must have worked for Milestone Contractors for at least 12 months (or 52 weeks) during a 7-year period.
- Must have worked at least 1,250 hours during the 12-month period immediately preceding the commencement of the leave, not including paid time off (vacation) or unpaid time off (layoff).

Reasons for Taking FMLA - To qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

- Parenting leave: the birth of a child and to care for that child, or the placement of a child for adoption or foster care and to care for the newly placed child.
- Family Medical Leave: to care for a spouse, child, or parent with a serious health condition (described below).
- Medical leave: to care for employee's own serious health condition.
- Qualifying Exigency Leave: for family members of current service members called to active duty.
- Military Caregiver Leave: to care for a current service member or veteran of the Armed forces with a serious health condition.

Serious Health Condition - A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

A serious health condition is one that makes the employee unable to perform the functions of the employee's position, and meets one (or more) of the definitions below:

A serious health condition is defined as a condition that requires:

- inpatient care at a hospital, hospice, or residential medical care facility, including any period of incapacity or any subsequent treatment in connection with such inpatient care
 - Inpatient care means an overnight stay in a hospital, hospice, or residential medical care facility, including any period of incapacity, or any subsequent treatment in connection with such inpatient care.
- OR
- continuing care by a licensed health care provider, which includes any one or more of the following:
 - Incapacity and treatment: A period of incapacity of more than three consecutive, full calendar days, and any subsequent treatment or period of incapacity relating to the same condition, that also involves
 - Treatment two or more times, within 30 days of the first day of incapacity, unless extenuating circumstances exist, by a health care provider, by a nurse under direct supervision of a health care provider, or by a provider of health care services (e.g., physical therapist) under orders of, or on referral by, a health care provider; or
 - Treatment by a health care provider on at least one occasion, which results in a regimen of continuing treatment under the supervision of the health care provider.
 - Treatment by a health care provider means an in-person visit to a health care provider. The first (or only) in-person treatment visit must take place within seven days of the first day of incapacity.
 - Pregnancy or prenatal care: Any period of incapacity due to pregnancy, or for prenatal care.
 - Chronic conditions: Any period of incapacity or treatment for such incapacity due to a chronic serious health condition. A chronic serious health condition is one which:
 - Requires periodic visits (defined as at least twice a year) for treatment by a health care provider, or by a nurse under direct supervision of a health care provider;
 - Continues over an extended period (including recurring episodes of a single underlying condition); and
 - May cause episodic rather than a continuing period of incapacity (e.g., asthma, diabetes, epilepsy, etc.).
 - Permanent or long-term conditions: A period of incapacity which is permanent or long-term due to a condition for which treatment may not be effective. The employee or family member must be under the continuing supervision of, but need not be receiving active treatment by, a health care provider. Examples include Alzheimer's, a severe stroke, or the terminal stages of a disease.
 - Conditions requiring multiple treatments: Any period of absence to receive multiple treatments (including any period of recovery therefrom) by a health care provider or by a provider of health care services under orders of, or on referral by, a health care provider, for:
 - Restorative surgery after an accident or other injury; or
 - A condition that would likely result in a period of incapacity of more than three consecutive, full calendar days in the absence of medical intervention or treatment, such as cancer (chemotherapy, radiation, etc.), severe arthritis (physical therapy), or kidney disease (dialysis)

Employees with questions about what illnesses are covered under this FMLA policy are encouraged to consult with the Human Resource Manager.

Qualifying Exigency

Qualifying exigency leave is available for families of members of the National Guard or Reserves or of a regular component of the Armed Forces when the covered military member is on covered active duty or called to covered active duty.

An employee whose spouse, son, daughter, or parent either has been notified of an impending call or order to covered active military duty or who is already on covered active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following:

- short-notice deployment
- military events and activities
- childcare and school activities
- financial and legal arrangements
- counseling
- rest and recuperation
- post-deployment activities, and
- additional activities that arise out of active duty, provided that the employer and employee agree, including agreement on timing and duration of the leave.

“Covered active duty” means:

- For members of a regular component of the Armed Forces means duty during deployment of the member with the Armed Forces to a foreign country.
- For members of the Reserve components of the Armed Forces means duty during the deployment of the member with the Armed Forces to a foreign country under a Federal call or order to active duty in support of a contingency operation, in accordance with 29 CR 825.102.

Military Caregiver Leave for Covered Service Member

Eligible employees are entitled to up to 26 weeks of FMLA leave in a single 12-month period to care for a covered service member with a serious injury or illness.

In order to care for a covered service member, an eligible employee must be the spouse, son, daughter, or parent, or next of kin of a covered service member.

- A “son or daughter of a covered service member” means the covered service member’s biological, adopted, or foster child, stepchild, legal ward, or a child for whom the covered service member stood in loco parentis, and who is of any age.
- A “parent of a covered service member” means a covered service member’s biological, adoptive, step or foster father or mother, or any other individual who stood in loco parentis to the covered service member. This term does not include parents “in law.”
- Under the FMLA, a “spouse” means a husband or wife, including those in same-sex marriages, which were made legal in all 50 United States as of June 26, 2015.
- The “next of kin of a covered service member” is the closest blood relative, other than the covered service member’s spouse, parent, son, or daughter.

The term “covered service member” means:

- A current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status; or is otherwise on the temporary disability retired list, for a serious injury or illness.
- A covered veteran who is undergoing medical treatment, recuperation or therapy for a serious injury or illness. Covered veteran means an individual who was a member of the Armed Forces (including a member of the National Guard or Reserves) and was discharged or released under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible employee takes FMLA leave.

The term “serious injury or illness” means:

- In the case of a current member of the Armed Forces, including a member of the National Guard or Reserves, means an injury or illness that was incurred by the covered service member in the line of duty on active duty in the Armed Forces or that existed before the beginning of the member’s active duty and was aggravated by service in the line of duty on active duty in the Armed Forces, and that may render the member medically unfit to perform the duties of the member’s office, grade, rank or rating; and,
- In the case of a covered veteran, means an injury or illness that was incurred by the member in the line of duty on active duty in the Armed Forces (or existed before the beginning of the member’s active duty and was aggravated by service in the line of duty on active duty in the Armed Forces) and manifested itself before or after the member became a veteran, and is:
 - a continuation of a serious injury or illness that was incurred or aggravated when the covered veteran was a member of the Armed Forces and rendered the service member unable to perform the duties of the service member’s office, grade, rank, or rating; or

- a physical or mental condition for which the covered veteran has received a U.S. Department of Veterans Affairs Service-Related Disability Rating (VASRD) of 50 percent or greater, and such VASRD rating is based, in whole or in part, on the condition precipitating the need for military caregiver leave; or
- a physical or mental condition that substantially impairs the covered veteran's ability to secure or follow a substantially gainful occupation by reason of a disability or disabilities related to military service, or would do so absent treatment; or
- an injury, including a psychological injury, on the basis of which the covered veteran has been enrolled in the Department of Veterans Affairs Program of Comprehensive Assistance for Family Caregivers.

Amount of Leave

An eligible employee can take up to 12 weeks for the FMLA circumstances (1) through (5) above under this policy during any 12-month period. Milestone will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes leave, Milestone will compute the amount of leave the employee has taken under this policy in the last 12 months and subtract it from the 12 weeks of available leave, and the balance remaining is the amount the employee is entitled to take at that time.

An eligible employee can take up to 26 weeks for the FMLA circumstance (6) above (military caregiver leave) during a single 12-month period. For this military caregiver leave, Milestone will measure the 12-month period as a rolling 12-month period measured forward. FMLA leave already taken for other FMLA circumstances will be deducted from the total of 26 weeks available.

If spouses both work for Milestone and each wish to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (but not a parent "in-law") with a serious health condition, the spouses may only take a combined total of 12 weeks of leave. If spouses both work for Milestone and each wish to take leave to care for a covered injured or ill service member, the spouses may only take a combined total of 26 weeks of leave.

Employee Status and Benefits During Leave

While an employee is on leave, Milestone will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work.

Under current Milestone policy, the employee pays a portion of the health care premium. While on paid leave, the employer will continue to make payroll deductions to collect the employee's share of the premium. While on unpaid leave, the employee must contact the Human Resources Department to make arrangements for payment.

Employee Status After Leave

An employee who takes leave under this policy may be asked to provide a fitness for duty (FFD) clearance from the health care provider. This requirement will be included in the employer's response to the FMLA request. Generally, an employee who takes FMLA leave will be able to return to the same position or a position with equivalent status, pay, benefits, and other employment terms. The position will be the same or one which is virtually identical in terms of pay, benefits, and working conditions. If, however, during the FMLA leave an event occurs that would have terminated or altered the employment of the employee had he or she not been on leave (e.g., a reduction in force, elimination of a shift), the employment, leave rights, employment conditions, or restoration rights of that employee will terminate at the same time as if the employee had not been on leave. Milestone may also choose to exempt certain key employees from this requirement and not return them to the same or similar position.

Use Of Paid And Unpaid Leave

An employee who is taking FMLA leave for any reason may choose to substitute available paid vacation or personal time for any portion of FMLA that is otherwise unpaid; such time will count toward the employee's 12-week FMLA entitlement.

If employee who is taking FMLA medical leave for his/her own serious health condition is also covered under short- or long-term disability benefits, he/she will receive pay under those benefit

parameters. Disability leave will run concurrent with FMLA and count toward the employee's 12-week entitlement.

Intermittent Leave Or A Reduced Work Schedule

The employee may take FMLA leave in 12 consecutive weeks, may use the leave intermittently (take a day periodically when needed over the year) or, under certain circumstances, may use the leave to reduce the workweek or workdays, resulting in a reduced hour schedule. In all cases, the leave may not exceed a total of 12 workweeks (or 26 workweeks to care for an injured or ill service member over a 12-month period).

Milestone may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule, in instances of when leave for the employee or employee's family member is foreseeable and for planned medical treatment, including recovery from a serious health condition or to care for a child after birth, or placement for adoption or foster care.

For the birth, adoption or foster care of a child, Milestone and the employee must mutually agree to the schedule before the employee may take the leave intermittently or work a reduced hour schedule. Leave for birth, adoption or foster care of a child must be taken within one year of the birth or placement of the child.

If the employee is taking leave for a serious health condition or because of the serious health condition of a family member, the employee should try to reach agreement with Milestone before taking intermittent leave or working a reduced hour schedule. If this is not possible, then the employee must prove that the use of the leave is medically necessary.

Employees must provide sufficient information for Milestone to determine if the leave may qualify for FMLA protection and to determine the anticipated timing and duration of the FMLA leave. Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform Human Resources if the requested leave is for a reason for which FMLA leave was previously taken or certified.

If an employee fails to comply with the responsibilities described above, FMLA leave may be denied or delayed. If FMLA leave is denied or delayed, and the employee misses or has missed work anyway, the employee's absences could result in discipline or termination of employment unless the absences are covered by another type of job-protected leave.

Milestone's Responsibilities

Milestone will inform an employee requesting leave whether he or she is eligible under FMLA. If he or she is eligible for FMLA leave, Milestone will notify the employee of any additional information, including medical or other certification, that Milestone requires to approve the FMLA leave as well as notify the employee of his or her rights and responsibilities. If an employee is not eligible, Milestone will notify the employee of a reason for the ineligibility.

Milestone will inform the employee if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If Milestone determines that the leave is not FMLA-protected, Milestone will notify the employee of this fact.

Certification for the Employee's Serious Health Condition

Milestone will require certification for the employee's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. Medical certification will be provided using the DOL Certification of Health Care Provider for Employee's Serious Health Condition.

Milestone may directly contact the employee's health care provider for verification or clarification purposes using a health care professional, an HR professional, leave administrator or management official. Milestone will not use the employee's direct supervisor for this contact. Before Milestone makes this direct contact with the health care provider, the employee will be given an opportunity to resolve any deficiencies in the medical certification. In compliance with

HIPAA Medical Privacy Rules, Milestone will obtain the employee's permission for clarification of individually identifiable health information.

Milestone has the right to ask for a second opinion if it has reason to doubt the certification. Milestone will pay for the employee to get a certification from a second doctor, which Milestone will select. Milestone may deny FMLA leave to an employee who refuses to release relevant medical records to the health care provider designated to provide a second or third opinion. If it is necessary to resolve a conflict between the original certification and the second opinion, Milestone will require the opinion of a third doctor. Milestone and the employee will mutually select the third doctor, and Milestone will pay for the opinion. This third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FMLA pending the second and/or third opinion.

Certification for the Family Member's Serious Health Condition

Milestone will require certification for the family member's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. Medical certification will be provided using the DOL Certification of Health Care Provider for Family Member's Serious Health Condition.

Milestone may directly contact the employee's family member's health care provider for verification or clarification purposes using a health care professional, an HR professional, leave administrator or management official. Milestone will not use the employee's direct supervisor for this contact. Before Milestone makes this direct contact with the health care provider, the employee will be given an opportunity to resolve any deficiencies in the medical certification. In compliance with HIPAA Medical Privacy Rules, Milestone will obtain the employee's family member's permission for clarification of individually identifiable health information.

Milestone has the right to ask for a second opinion if it has reason to doubt the certification. Milestone will pay for the employee's family member to get a certification from a second doctor, which Milestone will select. Milestone may deny FMLA leave to an employee whose family member refuses to release relevant medical records to the health care provider designated to provide a second or third opinion. If it is necessary to resolve a conflict between the original certification and the second opinion, Milestone will require the opinion of a third doctor. Milestone and the employee will mutually select the third doctor, and Milestone will pay for the opinion. This third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FMLA pending the second and/or third opinion.

Certification of Qualifying Exigency for Military Family Leave

Milestone will require certification of the qualifying exigency for military family leave. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. This certification will be provided using the DOL Certification of Qualifying Exigency for Military Family Leave.

Certification for Serious Injury or Illness of Covered Service member for Military Family Leave

Milestone will require certification for the serious injury or illness of the covered service member. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. This certification will be provided using the DOL Certification for Serious Injury or Illness of Covered Service member.
Recertification

Milestone may request recertification for the serious health condition of the employee or the employee's family member no more frequently than every 30 days unless circumstances have changed significantly, or if the employer receives information casting doubt on the reason given for the absence, or if the employee seeks an extension of his or her leave. Otherwise, Milestone may request recertification for the serious health condition of the employee or the employee's family member every six months in connection with an FMLA absence. Milestone may provide the

employee's health care provider with the employee's attendance records and ask whether need for leave is consistent with the employee's serious health condition.

Procedure for Requesting FMLA Leave

All employees requesting FMLA leave must provide verbal or written notice of the need for the leave to the HR department, or their supervisor. A supervisor who has received a request for leave must report such request to the HR department. Within five business days after the employee has provided this notice, the HR department will complete and provide the employee with the DOL Notice of Eligibility and Rights.

When the need for the leave is foreseeable, the employee must provide the employer with at least 30 days' notice. When an employee becomes aware of a need for FMLA leave less than 30 days in advance, the employee must provide notice of the need for the leave either the same day or the next business day. When the need for FMLA leave is not foreseeable, the employee must comply with Milestone's usual and customary notice and procedural requirements for requesting leave, absent unusual circumstances. When planning medical treatment, an employee must consult with Milestone and make a reasonable effort to schedule the treatment so as not to disrupt unduly Milestone's operations, subject to the approval of the health care provider.

Designation of FMLA Leave

Within five business days after the employee has submitted the appropriate certification form, the HR manager will complete and provide the employee with a written response to the employee's request for FMLA leave using the DOL Designation Notice.

Intent to Return to Work from FMLA Leave

On a basis that does not discriminate against employees on FMLA leave, Milestone may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

Complaint Procedure

Milestone encourages any employee who believes that the FMLA leave law has been violated to report the problem to Human Resources. All complaints will be promptly investigated.

Prohibited Acts and Enforcement

FMLA makes it unlawful for any employer to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA; and
- Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to the FMLA.

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights.

Social Media Policy

Milestone expects all employees to act professionally and to refrain from behavior, both on and off the job, which could adversely impact Milestone's reputation or mission. Further, Milestone always requires employees to treat their coworkers and others with respect. These standards apply to any statements made or information placed on or through electronic media (e.g., Facebook, Twitter, Instagram, LinkedIn, etc.).

We support our employees' use of electronic media as a vehicle for social and business networking; however, employees are prohibited from expressing their personal opinions that are knowingly or maliciously false about Milestone, its directors, management, employees, customers, or vendors, either by name or by implication, using electronic media. Content placed by individual employees on electronic media regarding Milestone or its directors, management, employees, customers, or vendors must make clear that it does not represent the views of Milestone.

Employees should not misuse Milestone's time and resources. Only employees who are required and approved to use electronic media as part of their jobs may have access to social media on Milestone's computers and during regular working hours, and then only to conduct Milestone business.

In addition, content placed on electronic media must not be discriminatory, violent, vulgar, obscene, threatening, intimidating, harassing, slanderous, or similarly unlawful toward employees, management, or Milestone or violate Milestone's Equal Employment Opportunity, Anti-Harassment, Confidential Information, and Workplace Conduct policies. Examples of such conduct includes offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment for any reason, but especially if such posts have as their basis race, color, religion, national origin, sex, sexual orientation, gender identity, veteran, disability, age, genetic information, or any other status protected by applicable law or Milestone policy.

Employees must not post any information on or through electronic media that Milestone considers to be confidential, including but not limited to trade secrets, proprietary information, and all other non-public information and data of or about Milestone and its business. Trade secrets, proprietary information and non-public information and data about Milestone include information regarding the development of systems, processes, products or services, know-how, and technology.

Employees' use of electronic media should not interfere with work commitments or performance.

This policy does not, in any manner, prohibit employees from discussing among themselves or others: wages, benefits, and other terms and conditions of employment or workplace matters of mutual concern that are protected by the National Labor Relations Act.

Employees learning of electronic media that is inconsistent with the requirements of this policy must immediately notify the HR department. Violations of this policy may result in disciplinary action up to and including discharge.

Electronic Technology Policy

This policy applies to users, computing resources and information assets consisting of hardware, software, data, the communications process, and service providers including but not limited to:

- Users are employees, temporary employees, consultants, and service providers granted access to Milestone computer resources. Each user is required to read, understand, and agree to comply with this policy.
- Hardware includes servers, desktop and laptop computers, tablets, PDAs, cell phones, smartphones, portable drives and storage devices, monitors, printers, routers, modems, switches, and multi-function copy machines and any other devices that will attach directly or indirectly to the THG network or its computing assets.
- Software includes applications that will be loaded onto a hardware device owned by Milestone or managed on its behalf.
- Data or information that will be stored on a hardware device owned by Milestone or managed on its behalf that is public, confidential, and protected business and personal data, business information, information that is provided by or shared with customers and partners.
- Communications include electronic means of communication such as email, blogs, discussion boards, forums and/or online postings.
- Service providers may include managed services providers, systems analysts, hardware break/fix, auditors, contract resources, business analysts, offsite hosting, etc.

Reasonable Care

Users and service providers are to exercise reasonable care regarding Milestone Contractors computing resources and information assets which includes, but is not limited to:

- Immediately reporting lost or stolen computing resources and/or information assets to the Milestone IT department.
- Responsibly caring for and safeguarding from damage and theft Milestone computing resources and/or information assets.
- Immediately reporting any breach of security or intrusion by viruses, malware, or other users
- Immediately reporting any misuse of computing resources and/or information assets.
- Immediately reporting any suspicious behavior of other employees or non-employees.

Complying with Licenses and Copyrights

It is the policy of Milestone to comply with all software and hardware licenses and copyrights.

- Unauthorized duplication of software may subject users and/or THG to both civil and criminal penalties under the United States Copyright Act. According to the US Copyright Act, illegal reproduction of software is subject to civil damages of as much as US\$100,000 per title infringed, and criminal penalties, including fines of as much as US\$250,000 per title infringed and imprisonment of up to five years.
- Users may not duplicate any licensed software or related documentation for use either on Milestone premises or elsewhere unless Milestone is expressly authorized to do so by agreement with the licensor.
- Users may not give Milestone software to any outside entities including employees, contractors, customers, or others.
- Users may only use software on local area networks or on multiple machines in accordance with applicable license agreements.

Ownership of Data

The following standards apply to ownership of data:

- All data and data files must have an owner who is responsible for the content and integrity of the data.
- Owners of data are responsible for defining their data's retention and archival requirements and communicating these requirements to IT.
- Milestone IT is the custodian of business unit data, not the owner of business unit data.

Altering Computer and LAN/WAN Configuration

- Users are not permitted to install any software or hardware on any Milestone owned computer without obtaining approval.
- Users are not permitted to alter the hardware configuration of any Milestone provided computer equipment, or LAN/WAN networking device.
- Users are not permitted to disable the anti-virus or other system management services (firewalls, encryption, Windows or other updates, anti-spyware, etc.), or change the configuration of the operating system.
- Users are not permitted to install alternate ISP or WAN data network services into any THG facility.

Purchasing Hardware and Software

- All computer hardware and software purchases must be approved by and/or purchased through the Milestone IT department.
- To initiate a purchase request, a detailed request should be sent to the Milestone IT department help desk, including the account and department to which the equipment is to be charged.
- Employees with procurement card privileges are not to purchase computer hardware or software with these cards without prior approval from the Milestone IT department.
- Employees who work from home may use or purchase their own equipment for use on their home network at their cost following approval of the equipment and/or software by Milestone IT.

Registration of Software, Hardware and Services

Software, hardware, and services requiring licenses or implying ownership must be registered in the name of THG or the appropriate business unit. These items must never be registered in the name of an individual user or external service provider.

Disposal of Computing Hardware

- Users must ensure that appropriate steps are taken to erase and/or destroy data and information contained on equipment destined for disposal.
- Users should conform to current e-scrap disposal programs to ensure proper handling and recycling of disposed equipment.

Computer Equipment and Software Personally Owned by a User or Service Providers

Without the prior approval of the Network Manager, users and service providers are prohibited from

- Installing software on THG's computers.
- Directly attaching computer equipment (laptops, desktops, routers, wireless devices, etc.) to Milestone network.
- Installing Milestone owned software on the users or service provider's personal computer, tablet or smartphone unless specifically allowed by its license. Separate licensing may be required to copy software for personal use.

Audits

- There will be periodic audits of all Milestone's computer assets to ensure that Milestone and users are in compliance with all software licenses and this policy and full cooperation of each user is required during an audit.
- Milestone's IT monitors the network and IT assets on a regular basis. If events occur that could jeopardize the availability or security of IT resources or put Milestone at risk of legal liability, IT will notify appropriate management and could result in disciplinary action.

Email Usage

- All email directed at Milestone email accounts is Milestone property and users should have no expectation of privacy.
- Milestone email accounts are for business use and Milestone email addresses should generally not be used to register for personal ecommerce or private communications.
- Users must not use the email system for 'spamming', either internally or externally. Spamming is defined as the sending of unsolicited, unnecessary, or unwanted emails to other email users.
- E-mail should not be used to solicit outside business ventures or for any political purpose.
- All e-mails are to be professional and must not contain inappropriate or offensive content.
- Users should not conduct THG/Milestone business using third party email accounts like Gmail, Yahoo, etc.
- Email is not archived, and backups are retained only for 30 days. Users must take steps to provide for an archival process if required.

Access to Computer Resources

Access to THG/Milestone computer resources and data is restricted to authorized users only.

- Employees may grant access to Milestone or THG computer resources to service providers, customers, or temporary employees but this access must be required by a clearly defined business need. These persons are to read, understand and sign this policy document.
- Access will be granted only for the time needed to perform the task.

Ownership of Stored Documents and Data

- All data and information, including emails, pictures, and other documents, stored on Milestone owned computers, tablets, smartphones, and other devices is the property of Milestone and users should have no expectation of privacy.
- Personal data should be stored only on the local computer drive and must not impact the performance of the computer.
- Personally owned documents are subject to deletion at any time and without notice.

Systems and Information Integrity, Security and Confidentiality

It is the responsibility of each user to help maintain the integrity, security and confidentiality of the information and systems that they use or manage.

- Users must not openly post system passwords nor are passwords to be shared with others.
- Users must use the username/password credentials they are assigned and are not to share access.

- Where possible in Milestone applications, all user account passwords established on internal and external systems that will contain Heritage data must conform to the following password security requirements.
- Password expiration = 90 days
- Password minimum age = 1 day
- Password history = 8 passwords
- Min password length = 8 characters
- Password complexity must mix alpha, numeric and special characters.
- Maximum invalid login attempts = 3
- Account lockout duration = 15 minutes
- Users are not to install or use any software intended to bypass security measures.
- Users are not to maliciously remove or modify Milestone data.

Only specific storage devices are backed up by THG/Milestone IT for recovery purposes. The user is responsible for all information stored on removable media or local (non-server based) storage drives. Desktops, laptops, tablets and portable drives are not backed up.

Users are to comply with all electronic document retention policies as required by their business unit management or by THG policy. Data is classified as Protected, Sensitive or Public. The definition of and handling of this information must conform to the guidance in table below.

Internet Use

Access to the Internet is limited to those users who have a business need. A manager may be required to approve/disapprove a user's Internet access.

- All Internet access is monitored and filtered to prevent abuse and inappropriate content. Users should not access inappropriate content on the Internet such as, nudity, violence, drugs, and gambling. Reports of usage will be provided to the appropriate management teams upon request or if abuse is detected.
- Limited use of Milestone's Internet is permitted so long as such use is minimal and does not impact performance or violate any of Milestone's policies or work rules.
- Any unauthorized use of the Internet is prohibited. Unauthorized uses include, but are not limited to, posting, viewing, downloading, or otherwise transmitting or receiving offensive, defamatory, pornographic, or sexually explicit material; engaging in computer "hacking" or other related activities; or attempting to disable or compromise the security of information on any computer.
- Only authorized personnel may establish Internet or other external network connections. Because other connections may cause unauthorized access to Milestone's systems and information, they are strictly prohibited. Prohibited connections include but are not limited to the establishment of hosts with public modem dial-ins, World Wide Web home pages and File Transfer Protocol (FTP).
- Users accessing the Internet are acting as representatives of THG and Milestone. As such, employees must act in a way that does not damage the reputation of Milestone or violate the confidentiality, integrity, or security of Milestone computer systems or information.
- Users shall not establish internet email accounts (google mail, yahoo mail, etc.), register URL's, web sites or blogs which could be interpreted to represent Milestone or would be used to transact Milestone business without prior management approval.
- Users shall not publish any content damaging to Milestone's reputation, themselves, or other individuals within Milestone on social networking sites, blogs, or forums.
- The truth or accuracy of information on the Internet and in e-mail should be considered suspect until confirmed by a separate reliable source.
- Employees shall not place any Milestone material (copyrighted software, internal correspondence, etc.) on any publicly accessible Internet site without a clearly defined business need and prior management approval.
- The Internet does not guarantee the privacy or confidentiality of information. Sensitive material transferred over the Internet may be at risk of detection by a third-party. Employees must exercise great caution and care when transferring such material in any form.

- Unless otherwise noted, all software on the Internet should be considered copyrighted work. Therefore, employees are prohibited from downloading software and/or modifying any such files without permission from the copyright holder and compliance with all other licensing requirements.
- 'Shareware' and 'freeware' downloadable from the Internet must be reviewed and installed by the Milestone IT group.
- Any infringing activity on the Internet by an employee may be the responsibility of THG or Milestone. Therefore, THG or Milestone may choose to hold the employee liable for their actions.

Social Media

The general use of social media is determined by each business unit. All social media use from THG and/or Milestone owned equipment and THG and/or Milestone network-connected devices is monitored and filtered by THG and/or Milestone IT to prevent abuse and inappropriate content. Excessive use of social media may result in disciplinary actions.

Please refer to the Social Media Policy for further guidance.

Mobile Devices

The following standards apply to the use of mobile devices for Milestone business use:

- Only supported mobile devices are authorized for connection to Milestone systems. Exceptions must be approved by Milestone IT.
- All mobile devices that connect to the Milestone environment must be registered.
- All devices must have the ownership information correctly stored on the device (e.g., your name and telephone number).

Mobile devices containing Milestone documents or email must be secured with a PIN and device encryption.

Access to these systems will be revoked immediately upon termination. Any violation of this policy may result in disciplinary action up to and including termination.

Attendance And Punctuality

Regular and timely attendance are essential requirements of every employee's position. When any employee is late or absent, Milestone's ability to serve its customers, and perform other work is affected and an extra unfair burden is placed on fellow workers. Any employee who is going to be absent or late must call his or her supervisor as soon as possible (but not later than the scheduled start of the employee's workday). Excessive absences or tardiness may lead to discipline, up to and including termination of employment.

If an employee is absent for more than one day, the employee must notify his or her supervisor each day (unless the employee is on an approved leave of absence or pre-approved time away from work). An employee who fails to report to work and fails to notify his or her supervisor of the reason for his or her absence from work for three consecutive workdays will be considered to have abandoned his or her job and voluntarily resigned.

Protection Of Confidential Information

In the course of employment with Milestone, employees will have access to, view or work with information and materials that are confidential and that are regarded by Milestone or its customers as confidential, proprietary, or trade secrets. Such confidential information and materials are very valuable to Milestone and its customers, partners or associated THG businesses. Therefore, improper access to or disclosure of any such confidential information and materials could irreparably harm Milestone and its customers, partners or other THG businesses.

It is impossible to list all the kinds of confidential information and materials to which employees might have access, which employees might view, or with which employees might work or be entrusted while at Milestone. Therefore, employees should treat all of Milestone's and its customers or partners business affairs, materials, plans and projects as confidential information. Employees also should keep confidential all tangible property associated with these matters, such as notes, drawings, letters, software codes, programs, scripts, processes, designs, artwork, photographs, printouts and non-public materials of any kind that employees or others prepare. Milestone may further designate from time to time other specific items that are to be treated by employees as confidential.

Because of the importance of confidential information and materials to the business of Milestone and its customers or partners, employees must not, at any time, disclose any such confidential information and materials to anyone—even after they leave Milestone—except as specifically authorized by Milestone in the course of their employment, nor may employees make any personal use of such confidential information and materials. Similarly, all non-public documents, files, records, and other work product relating to Milestone or its customers or partners are the property of Milestone or its customers or partners and should not be removed from the premises of Milestone except as authorized by Milestone, in the course of the employees' employment. Employees must exercise utmost care and take all steps that may be necessary to protect and guard against the disclosure of any confidential information or materials to anyone, even family members or vendors, suppliers, contractors, consultants, and others who may serve Milestone or its customers or partners.

Employees are not entitled to view or gain access to all confidential information and materials of Milestone or its customers or partners. Employees are entitled to gain access to and view only that confidential information and materials specifically entrusted to them for the purpose of performing their job at Milestone.

If employees are in possession of a previous employer's or another's confidential information and materials, employees have an obligation not to disclose such confidential information or materials to anyone at Milestone and must not do so. Employees are also prohibited from violating the rights of any other party in connection with their work and must honor all copyrights and other rights in computer software, photographs, drawings, written works, music, and other materials licensed for use or entrusted to Milestone or its clients.

No employee may photograph, tape, or otherwise record any person, document, conversation, communication, or activity that in any way involves confidential information of Milestone or employees of Milestone, its customers or partners, or any other individual with whom Milestone is doing business or intending to do business in any capacity. The authorized copying of documents in the ordinary course of business for the benefit of Milestone is not prohibited by this policy. Limited exceptions will apply where the photographing, taping, or recording is being conducted by an individual who has been provided advance authorization for the activity by an authorized member of Milestone management. Where the conduct engaged in is illegal, violators may be subject to prosecution under applicable law.

This policy is not intended to, and does not, in any manner, prohibit employees from discussing among themselves or other's wages, benefits, and other terms and conditions of employment or workplace matters of mutual concern that are protected by the National Labor Relations Act.

Employee Conduct And Performance Counseling

Milestone expects all employees to meet certain standards of work performance and personal conduct. We expect you to conduct yourself safely, professionally, and act in the best interests of customers and co-workers at all times.

Normally, transgressions are handled with performance counseling and corrective action.

Because circumstances may vary, each situation will be handled on an individual basis, and in proportion to the seriousness of the offense. This may include disciplinary action, up to and including termination, even on the first offense, if the offense is sufficiently serious, or such action is necessary to prevent further violations.

Each situation will generally be considered in light of a variety of factors including, but not limited to, the seriousness of the situation; the employee's past conduct and length of service; and the nature of the employee's previous performance or incidents involving the employee.

Depending upon the facts, disciplinary action may include oral or written warnings, probation, suspension with or without pay, or immediate termination of employment. Because all employees are employed on an at-will basis, Milestone has the right to terminate employment of any employee at any time for any reason, with or without notice.

While the following should not be considered exhaustive, this list includes major infractions that would warrant enough cause for disciplinary action.

- Theft or unauthorized possession or removal of Milestone property, or property of a fellow employee.
- Willful destruction, or reckless disregard of Milestone property, or the property of a fellow employee.
- Deliberate or unauthorized use of Milestone supplies, materials, or equipment.
- Fighting with, threatening, or attempting bodily injury to another employee on Milestone premises or while conducting Milestone business.
- Falsifying Milestone records or reports, including one's time records or the time records of another employee.
- Check fraud: cashing or negotiating a check that was previously reported lost or stolen.
- Reporting to work under the influence of or having the appearance of being under the influence of, drugs or alcohol.
- Possessing, distributing, selling, transferring, or using alcohol or illegal drugs in the workplace.
- Engaging in criminal conduct, whether or not related to the job performance.
- Insubordination, or willfully disregarding a supervisor's instructions.
- Using excessively abusive, threatening, or obscene language
- Violating Milestone's EEO, Anti-Harassment or Drug Free Workplace policies.
- Failing to report to work regularly and on time for scheduled work shifts; failing to notify supervisor of your absence or tardiness prior to the start of the shift.
- Leaving your work area during working time without permission from your supervisor.
- Failing to perform work according to established quality or quantity guidelines.
- Sending, receiving, printing, or falsifying confidential data, trade secrets, or any other confidential Milestone information.
- Failing to report accidents and/or work-related injuries.

No Smoking Policy

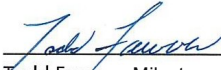
Milestone Contractors is committed to protecting the health of its employees and visitors by providing a safe, comfortable, and protective business environment. A no-smoking policy was implemented making all Milestone Contractors facilities smoke free, including all offices, field offices, maintenance shops, asphalt plants, warehouses, and Milestone owned vehicles.

Milestone Contractor's Safety Culture

The employees of Milestone Contractors are our most valued assets and part of our extended family. Just like our own families, we will go to great lengths to protect them, and we watch out for each other. The safety of every one of our employees is our greatest responsibility, and the cornerstone of our culture. It is the core value that takes precedence over any other core value. It is our hope that we help make our employees' lives better.

Our Safety Culture relies on everyone being invested in and committed to the goal of Zero incidents and injuries. Training, planning, risk management, accident prevention, and open communication are all key principles of our safety culture. Every employee is responsible for the implementation, daily practice, and improvement of the safety and health policy. Employee-engagement in these principles is vital to the success of our safety culture.

At Milestone Contractor's, we are responsible for making safe choices not only for ourselves, but for those around us.



Todd Fawver, Milestone Contractor's, North Regional President



Mark Thompson, Milestone Contractor's, South Regional President



CJ Potts, Heritage Construction and Materials-Construction Group, COO

Milestone Contractor's Safety Rules

All Milestone Contractor's employees will abide by the following job site safety rules. Violation of any of the following rules may be cause for immediate disciplinary action or termination.

1. Immediately report any unsafe conditions and near misses to your supervisor or safety department.
2. Immediately report all injuries and property damages to your supervisor or safety department, including vehicle incidents by the traveling public.
3. Employees who are unable to report to work must notify their immediate supervisor, prior to the start of their shift.
4. Personal Protective Equipment (PPE) such as hard hats, safety toe boots, class III high visibility clothing and safety glasses must be worn at all times. Metatarsal guards, hearing protection and impact gloves must be worn when jack hammering or performing similar work. Gloves may be required for the task; therefore, each employee must carry the appropriate pair of gloves with them in the field.
 - Truck drivers are required to wear hard hat, safety glasses, and Class III high visibility clothing when outside of their vehicles.
5. Use appropriate face shields and eye protection where there is a danger from flying objects or particles when grinding, sawing, cutting or chipping.
6. Certain site or plant conditions may require respiratory protection.

7. When working 4 feet or more at plants or 6 feet or more at jobsites, a safety harness must be worn and secured to an adequate anchor point or a guard rail system must be erected, unless outlined differently in the project specific safety plan.
8. Proper clothing is required, long pants and shirt required at all times. Loose clothing or jewelry shall not be worn.
9. Properly care for and be responsible for all PPE. Report lost or damaged equipment.
10. During an emergency, employees are to report to their supervisor at the designated assembly area for a head count.
11. The use of or being under the influence of intoxicating beverages or illegal drugs while on company premises, jobsites or while operating company vehicles or equipment is prohibited. This may be reason for immediate dismissal. Prescription drugs, which may cause drowsiness, must be reported to your supervisor.
12. Injured employees may only work under a doctor's care (work related or personal injury), with a physician statement of restrictions and approval by the safety department. All employees working under a doctor's care must adhere to the restrictions prescribed.
13. If you are injured away from the job, notify your supervisor. The injury may affect your job performance or worsen the injury.
14. All work-related employee injuries will be managed by the safety department.
15. If you must seek medical attention concerning a work-related injury or illness after work hours notify your supervisor and safety department to get-prior authorization.
16. Horseplay and violent behavior shall not be permitted.
17. Headphones/earbuds for music listening are not allowed while on the jobsite, and the use of personal mobile phones is prohibited unless authorized by the employee's supervisor or instances of emergency. **ABSOLUTELY NO TEXTING OR NON-HANDS-FREE TALKING ON MOBILE PHONES SHALL OCCUR WHILE DRIVING A VEHICLE. ABSOLUTELY NO MOBILE PHONE/ELECTRONIC DEVICE USAGE SHALL OCCUR WHILE OPERATING ANY EQUIPMENT.**
18. Good housekeeping shall be practiced by all employees. Excessive material shall be properly labeled, stacked, and stored. Protruding nails, wires etc. shall be bent over, cut, or removed. Debris should not be allowed to accumulate and will be frequently removed. Do not allow debris to accumulate in aisles, near stairways, in work vehicles or in front of an egress.
19. Flammable and combustible liquids must be stored properly and securely transported in a safe manner. Safety cans must be labeled and equipped with self-closing lids and flash arresters installed. Engines must be shut off when refueling. No smoking anywhere near flammable liquids. Single walled fuel tanks require dikes and double walled tanks require barricades. A fire extinguisher must be 25 feet, but not more than 75 feet, from the fuel tank.
20. Flammable cabinets are required for storage of more than 25 gallons of combustible liquid. Cabinets must be of the proper category and not overstocked. Cabinets must be labeled "Flammable Keep Away from Open Flames."
21. Compressed gas cylinders (propane, oxygen, acetylene, etc.) must be secured in an upright position. When not in use, caps must be securely attached. Oxygen and acetylene must not be stored together when not on the cart and must be separated by 20 feet or a one-half hour/5-foot burn wall.
22. Never operate any machines or equipment unless all guards and safety devices are in place and in proper working order.
23. Trucks and applicable equipment shall be equipped with functioning reverse signal back-up alarms audible above the surrounding background noise. At no time shall the back-up alarm be disabled. Vehicles without backup alarms must be taken out of service or provided with a spotter at all times.
24. All vehicles, equipment and tools shall be kept in good condition, be operated in accordance with manufacturer's specifications and defective items should be taken out of service and tagged as such.

25. Mobile equipment must be properly oiled, cleaned, adjusted, and refueled by an authorized operator.
26. Lockout/Tag out must be used prior to equipment maintenance. Verification of energy source Lockout/Tag out should be made prior to maintenance, along with employee locations.
27. All drivers are required to have the proper license for the vehicle they are driving. Drivers of vehicles requiring a CDL license must meet all required D.O.T. Motor Carrier Regulations and be able to produce such documents when requested by proper authorities.
28. No employee shall ride on the outside of the cab of a truck or equipment. Riding material hoists or other moving equipment is prohibited, except in seats that are provided.
Individuals operating equipment or riding in vehicles shall properly wear seat belts at all times.
29. When burning or welding is being performed, a fire extinguisher must be close at hand at all times and fire watch as needed per the job hazard analysis. Only authorized employees shall weld. They shall wear the appropriate protective face shield, eye protection and cotton or FR clothing. Employees should be instructed to the visual dangers of welding flash and shielding should be used where possible.
30. Stepladders shall be used only in the full open and locked position. Do not use a stepladder leaning against the wall. The top step and top cap are not to be used. Place all ladders on a substantial base. Never use ladders with broken, split, missing rungs, or rails. All access ladders are to be extended to at least 3 feet above the walking surface and properly fastened. The Proper placement for an extension ladder is ¼ base to height (1: 4 ratio).
31. The use of material handling equipment should be utilized as the preferred method of handling materials if feasible. If not, plan your lift and use proper lifting techniques. Lift with your legs, not your back and avoid twisting. Stretch your muscles before lifting. Do not be embarrassed to ask for help. Watch your footing, particularly when carrying material.
32. No employee is to walk under a raised load, bucket, or boom at any time. Be alert to cables under tension, cabled loads and moving parts.
33. Running on the job is prohibited. Jumping off ladders, equipment, trailers, etc., of any height, is grounds for dismissal. While ascending and descending any ladder or equipment use three-points of contact (2 hands/1 foot; 2 feet/1 hand), facing the ladder. Use a rope to lift tools.
34. Milestone Contractors has a Hazardous Communications Program (HCP). The purpose of this program is to inform our workers of chemicals that we work with to reduce/eliminate chemical illnesses or injuries. This includes Safety Data Sheets and proper labeling. If you have any questions about any chemical you are working with or around, contact your supervisor.
35. If you do not understand instructions or know how to do the job safely, ask your supervisor.
36. All posted safety rules must be obeyed. You must comply with all known federal, state, local laws, employer regulations and policies. Make all decisions based on safest practical methods, after performing a task/job hazard analysis.
37. Use extra caution during low illumination conditions (dawn, dusk, and night construction).
38. Be alert of warning signs that may be posted in the work area.
39. Do not operate any machinery or tools that you are not trained, qualified, or authorized to use.
40. Employees using lasers must be trained and employees must be notified of potential hazards. Appropriate warning signs must be posted in the work area.
41. Drivers are not allowed to cross the median or use turn around areas on interstate routes unless they are pulling into the "Dead Lane" that has been established for traffic purposes. If no "Dead Lane" exists, drivers are required to go to the next exit.
42. Raised truck beds pose a hazard to ground employees. Do not approach or be in the immediate vicinity of a truck while the bed is raised.
43. Always watch for heavy equipment and give yourself ample distance when approaching on foot or in your truck. Make eye contact with the operator and make sure he/she

acknowledges your presence before proceeding. Be careful where you park your vehicle and do not "hang around" heavy equipment unnecessarily.

44. Do not walk in the blind spots of equipment or vehicles. Use spotters when necessary.
45. Always be cautious when working around live traffic.
46. Always watch for overhead powerlines. Assume all overhead lines are always energized. No part or piece of equipment or person shall be closer than 10 feet to an energized power line and 20 feet for cranes.
47. All company owned vehicles and equipment (leased or rented) including all vehicles that are covered by a reimbursement program are subject to the following:
 - Drivers and operators are responsible for the safe actions of their vehicle/equipment. There shall be **NO BACKING** as a first movement of equipment/vehicles. Plan your first movement in a manner that conforms to this policy. All movement should be going forward at least the length of the vehicle/equipment. When backing is necessary a spotter or vehicle walk around is required prior to movement.
 - Employees driving their personal vehicles to jobsites shall comply with the equipment awareness safety policy, which states, maintaining a 100 feet safe distance, and always signal to get attention prior to approaching work activities.

If It's Unsafe, Don't Do It!

Employees of Milestone are empowered to ensure their own safety and the safety of others, using the motto "IF IT'S UNSAFE, DON'T DO IT", and may refuse or interrupt a task on this basis, giving every employee stop work authority. Should an employee be directed to perform a task that they deem unsafe, the employee should not perform the task until the hazard has been resolved. To resolve this situation an employee should:

- Notify their supervisor that the situation is unsafe to perform the task.
- If the supervisor resolves the hazard the task may be performed.
- If the supervisor does not resolve the hazard contact the General Superintendent to resolve the situation.
- If the General Superintendent does not resolve the situation the Safety Representative and Area VP should be notified, and the task put on hold until the situation is resolved.

Safety Responsibilities

Executive Management – COO, Regional Presidents & VP/Area Managers'

- Responsible for safety of all employees.
- Approves safety policies as formulated by the Safety Department.
- Participates in the safety program as recommended by the Safety Department or Safety Excellence Team and Committees.
- Reviews and responds accordingly to safety reports and safety trends.
- Make periodic visits to jobsites and plants, to support Operations, demonstrate commitment to safety, and request feedback on safety efforts.
- Participates in OSHA inspections and informal conferences, when possible.

Safety Director

- Promote safety education and training.
- Analyze safety data for trends.
- Annually review written safety program and update as needed.
- Coordinate the distribution of safety materials and forms.
- Coordinate safety activities such as employee training and jobsite safety inspections.
- Coordinate the implementation of OSHA regulations, company rules and policies.
- Provide technical safety support to Executive Management.

- Coordinate efforts with Equipment Department to ensure that safety controls exist and function properly.
- Support Safety Representatives in their efforts to advise and support Area Managers, Project Managers, General Superintendents, Plant Managers, Estimators, Superintendents, and all other employees.
- Make periodic visits to jobsites and plants, to support Operations, demonstrate commitment to safety, and request feedback on safety efforts.
- Stay up to date on applicable OSHA regulations and industry best practices.
- Maintain professional growth through education and training.
- Participates in OSHA inspections and informal conferences, when possible.

Safety Representatives Responsibilities:

- Promote safety education and training.
- Conduct New Hire Orientation.
- Maintain basic PPE inventory as needed.
- Provide or coordinate annual and project specific safety training and maintain training records.
- Conduct frequent and regular documented safety inspections.
- Conducts industrial hygiene monitoring as required, communicating and recording results.
- Provide technical safety support to Area Managers, Project Managers, General Superintendents, Plant Managers, Estimators, Superintendents, and all other employees.
- Assist supervision with safety plan development.
- Coordinate incident investigations and complete investigation reports, with General Superintendent and Project Superintendent involvement.
- Issue toolbox talks and safety alerts to project supervision.
- Create and distribute safety reports.
- Attend industry safety meetings and conferences.
- Manage employee injury care through clinic or hospital visits, Medcor consultation, or onsite first aid treatment.
- Make periodic visits to jobsites and plants, to support Operations, demonstrate commitment to safety, and request feedback on safety efforts.
- Stay up to date on applicable OSHA regulations and industry best practices.
- Maintain professional growth through education and training.

General Superintendent/Plant Manager Responsibilities

- Responsible for supporting the Supervision in the implementation of the Milestone written safety program on the jobsite.
- Ensure that safe practices are followed, and safe conditions maintained throughout the job.
- Support Supervision in correcting identified safety hazards or conditions.
- Responsible for ensuring that a hazard analysis is developed to identify the exposure and control methods to hazards, which may develop on the jobsite.
- Ensure that daily huddles, weekly toolbox talks, and crew jobsite safety inspections are conducted.
- Make periodic visits to jobsites and plants, to support operations, demonstrate commitment to safety, and request feedback on safety efforts.
- Be familiar with applicable OSHA regulations, Milestone written safety programs and best practices as well as industry best practices.
- Participate in OSHA investigations where possible.
- Help direct all injury/incident investigations, along with Safety Representatives.

Project Superintendent/Plant Operator Responsibilities:

- Responsible for the implementation of the Milestone written safety program on the jobsite.
- Ensure that safe practices are followed, and safe conditions maintained throughout the job.
- Ensure identified safety hazards or conditions are corrected.
- Responsible for ensuring that a hazard analysis is developed to identify the exposure and control methods of hazards that may develop on the jobsite.
- Responsible for ensuring that daily huddles, weekly toolbox talks, and crew jobsite safety inspections are completed and documented.

- Provide on the job training as needed.
- Attend and participate in all required safety trainings and meetings.
- Ensure that the required PPE is available on site and used appropriately.
- Ensure that equipment operators conduct pre shift inspection for equipment and report deficiencies.
- Develop a job specific safety plan prior to the start of work.
- Complete near miss and incident reports.
- Review near misses and incidents with crew members and ensure that corrective action is taken.
- Ensure that subcontractors comply with Milestone safety requirements per their subcontract agreement.
- Be familiar with applicable OSHA regulations, Milestone written safety programs and best practices as well as industry best practices.

Employee Responsibilities:

- Work according to good safety practices as posted, instructed, and discussed.
- Refrain from any unsafe act that might endanger themselves, their coworkers, traveling public, subcontractor, etc.
- Use all PPE and safety devices provided for their protection and inspect replace as needed.
- Report any unsafe conditions or acts to their Supervisor or Safety Representative immediately.
- Assume their share of responsibility for their own safety and the safety of their coworkers.
- Report any injury, no matter how minor, to their Supervisor or Safety Representative immediately.
- Maintain good housekeeping in their work area.
- Be a safe employee off the job as well as on.

Craft Safety Committee Responsibilities:

- Serve in an advisory capacity to Management in determining a general plan of action for the Milestone Safety Program and Best Practices.
- Attend scheduled meetings.

Milestone Craft Safety Committee

The purpose of this committee is to assist management on matters relating to the identification of hazards and the prevention of incidents.

Function

Create and maintain an active interest in safety and reduce incidents.

- Involve coworkers in furthering the cause of accident prevention.
- Discuss safety policies and procedures and make recommendation to management.
- Conduct safety inspections, discover unsafe conditions and practices, and determine their solutions.
- Champion safety - stimulate and maintain the interest of coworkers and convince them that they should obey safety rules and instructions.
- Maintain cooperation between all levels of management and employees.
- Review accident investigations and make suggestions and recommendations.
- Management supports this initiative and operations will support the time it takes monthly to complete these meetings, this is an integral part of improving our safety program.

Makeup of Committee

One committee from each Milestone area

- Six-to-10-member committee size.
- Area safety rep to organize first meeting, then attends as an advisor.
- Members to include:
 - Leadmen/lead-women
 - Carpenters
 - Operators

- Laborers
- Finishers
- Drivers
- Voluntary basis (paid for time spent for meetings)
- Meeting Agenda:
 - First meeting vote on leader and second in command
 - Once a month or every 6 weeks, 60 to 90-minute meeting
 - List and vet out ideas that will continue to improve our safety program.
 - Members go back to crews for ideas and thoughts on vetted suggestions.
 - Formulate and pitch improvements to safety excellence committee.

Safety Toed Shoe Requirement

The following describes the procedure for the Safety Toe Footwear Policy.

- All Milestone employees are required to wear Safety Toe work boots.
- Safety Toe work boots are defined as: safety toe, toe armor, or composite toe design.
- Milestone employees are eligible for reimbursement after 90 days of employment. Milestone will pay up to \$200 towards the purchase of safety toe work boots. Employees must turn in the receipts to their supervisor for payment of the safety toe boots. The supervisor shall write the employee's employee id# on the receipt and sign it after verifying that the boots meet the requirements as outline below. The supervisor shall turn in the signed receipt to the appropriate HR Partner for payment.
- Receipts must be dated no earlier than one week prior to employment and may contain more than one pair of Safety Toed Footwear.
- All Safety Toe footwear must be at least 6" in height.
- No Athletic type of safety toe footwear will be permitted.
- All Safety Toe footwear must be of a work boot design.
- Associates will be reimbursed for safety toe footwear on an annual basis, or at the General Superintendent discretion.

Prescription Safety Eyewear Program

The following describes the procedure for the Prescription Safety Eyewear Policy.

- All Milestone employees are required to always wear safety glasses and at plants.
- Employees who wear prescription eyeglasses are eligible to participate in the Milestone Prescription safety Eyewear Program after 90 days of employment per the Guidelines listed below,
- Safety Eyewear is defined as: Safety Eyewear must meet the ANSI Z87 Standard for Frames, Lenses and Side-shields.
- Fitted side-shields must be attached to prescription safety glasses, when worn on the jobsite.
- A reimbursement will be given toward the purchase of Prescription Safety Eyewear, which may be paid every 2 years to eligible employees:
 - Up to \$100 – Single Vision Lenses every 2 years.
 - Up to \$200 – Bifocal & Trifocal Lenses every 2 years.
- Employees must turn in the receipts to their supervisor for payment. The supervisor shall sign and write the Associate's employee id# and turn the signed receipt to the appropriate HR Partner for payment.
- The receipt must state that the lenses, frames, and side shields meet ANSI Z87 Standards.
- Employees will not be reimbursed for the purchase of Non-Prescription Safety Eyewear.

Safety Incentive Program

Safety Incentive awards to include Lunch/Breakfast, Class III Safety T-Shirts, or other options as available and approved by Management.

- Upon working a minimum of sixty (60) consecutive workdays without a recordable injury or at fault property damage incident. The crew will be provided with a safety incentive lunch/breakfast or the crew may choose a Safety T-shirt.
- Crews may choose to bank their days to obtain other items.
- 60 days – T-shirts, Breakfast or Lunch.
- 120 days – 2 of any of the 60-day items or 1 Class III bomber jacket or 1 Class III hooded sweatshirt.
- If a crew has a recordable injury or at fault property damage incident the days go back to zero (0) whether trying to achieve 60 or 120 days.
- Supervisor must record safe days on their daily huddle forms. They must communicate this total to all employees on the job site.
- Should questions arise regarding “At Fault” status; the Incident Investigation Team will determine “At Fault” status of that claim.
- Tracking and recognition are provided per crew, not per project. Each crew is responsible for the safety performance of any and all members that might be assigned to that crew.
- Upon achieving a sixty (60) day record the Supervisor shall notify Area Safety Representative or General Superintendent, who will plan & schedule a day and time to recognize the crew's achievements.
- Production of work will cease during the Lunch/Breakfast. This is to reward and recognize the achievement of the crew. Crew members will be compensated during recognition breakfast/lunch.
- Receipts are coded to the area safety code, specified by the area Safety Representative.
- No Alcoholic beverages permitted.
- Days may not be carried over to the next year and no crew will be rewarded more than 120 days at a time.

Daily Huddle Process/JHA(Job Hazard Analysis)

Milestone's Daily Huddle Program communicates information with crew members in a timely, efficient manner. It is imperative that a Daily Huddle be conducted each and every day work takes place and throughout the day as work tasks change from the original plan.

- Supervisor meets with crew at beginning of project to review job, Project Safety Plan (as applicable), and assign responsibilities to trained employees as applicable.
- Foreman/Superintendents are responsible for creating the JHA document prior to holding daily huddle meeting in HCSS Safety.
- Foreman/Superintendent participates leads and/or delegates the daily huddle with the entire crew prior to starting work or new work tasks.
- Supervisor and crew establish specific safety concerns in regards to production targets for the days tasks.
- A proper JHA should include but not be limited to a listing of the the days task with evaluation of the hazards involved, the hazard abatements and tools/PPE/management/training to accomplish the tasks safely.
- Participation and input from all crew members is essential to effectively create the best plan and confirm crew understanding.
- Attendance shall be documented via HCSS Safety.

Job Site Safety Inspections

The Job Site Safety Inspection is a process to determine the level of safety compliance on the job site regarding Milestone's written safety policies and with general safety precautions.

- Safety Inspections should be conducted with the assistance of the Supervisor when available.
- Safety or Management personnel will conduct Inspections using HCSS Safety.
- Supervisors will be required to correct all identified problems.
- Safety or Management personnel will be responsible for following up on identified problems to make sure they are corrected in a timely manner. If problems are not corrected, Safety Personnel shall follow-up with General Superintendent, as necessary.
- Safety Inspections are reviewed by the Safety Department.

OSHA Inspections

Milestone Contractors has entered a partnership with the Indiana Department of Labor (IDOL) through Indiana Constructors Inc. (ICI). This partnership recognizes those companies whose safety programs and record are excellent and as ICI partner companies are afforded these benefits.

- IDOL exempts Milestone from scheduled general inspections and will not issue citations to companies for non-serious violations that are abated immediately and in the presence of the compliance officer.
- Milestone will receive un-programmed inspections only in response to reports of imminent danger, fatalities/catastrophes, and "plain view" violations/conditions and in case of a signed formal complaint.
- Non-formal complaints will be handled through the phone/fax process if the complainant agrees.
- During IDOL inspections of non-participating employers, Milestone will not be included in the inspection unless the inspector observes that because of the partnership contractor's actions, any employees are exposed to hazards such as, but not limited to falls, electrical hazards, caught in/between hazards or struck by hazards.
- For inspections resulting from formal complaints, the inspection will be limited to the complaint item(s) and "in plain view" items.

During inspections, if potential violations are found, i.e., where employees are not exposed to the hazard, IDOL may review the employer's records and provide limited on-site training as needed.

Under the OSHA Act of 1970, OSHA has the authority to conduct workplace inspections. This procedure establishes responsibilities for compliance with OSHA inspections and applies to all Milestone construction sites, asphalt plants and offices subject to an OSHA inspection.

Definitions

- Imminent Danger – Any condition where there is reasonable certainty that a danger exists that can be expected to cause death or serious physical harm.
- Opening Conference – Meeting where the OSHA inspector will explain the purpose of their visit.
- Walk-around – The OSHA inspector will walk around the site-making note of any safety violations.
- Closing Conference – Meeting where the OSHA inspector discusses with employer all unsafe or unhealthful conditions observed during the inspection and indicate all apparent violations for which a citation may be issued or recommended.

Procedure

- Upon arrival of an OSHA inspector on a Milestone site, insist upon seeing the inspector's credentials.

- Notify the General Superintendent and the appropriate Safety Associate of OSHA's presence on site.
- Ask the OSHA inspector to delay the opening conference until the appropriate Safety Associate arrives.
- Whenever possible take pictures and measurements of whatever the OSHA inspector take pictures and measurements of during the inspection.
- Accompany the inspector on the walk-around inspection and never leave them alone during the inspection, except while employee interviews or walk abouts are being conducted.
- Do not operate any equipment that is not in operation at the time of the inspection.
- Ensure that the following information is made available to the OSHA inspector:
 - Milestone federal identification number
 - OSHA 300 logs for the current year to date and for the past 2 years
 - Milestone Safety Manual and HazCom Program

Alcohol and Drug Free Workplace Policy/Statement

Milestone Contractor's maintains a drug-free workplace in keeping with the spirit and intent of the Drug-Free Workplace Act of 1988. We are committed to promoting and maintaining a drug-free working environment for all our employees and promoting and protecting the safety, health, and well-being of our employees. The use of alcohol and controlled substances not prescribed for the associate or illegal drugs is inconsistent with the behavior expected of our associates.

The unlawful manufacture, distribution, dispensation, possession, sale, or improper use of a controlled substance in the workplace or while engaged in company business is strictly prohibited. **Adherence to the alcohol and drug-free workplace policy is a condition of continued employment.**

- **This policy will be applied in a manner consistent with all applicable federal, state and local law.**
- **This policy covers all non-DOT-covered employees of the named employers (DOT-covered employees are subject to the applicable regulations and procedures) and all new employees post-offer, pre-hire.**
- **Confidentiality:** All records pursuant to the alcohol and drug-free workplace policy will be maintained in a separate confidential file, in accordance with applicable statutory or regulatory requirements.
- **Employees' Duty to Report Convictions:** Any employee who is convicted of violating any criminal drug statute regarding a violation occurring in the workplace must notify Human Resources Department within five (5) days of the conviction.

Substance Abuse Testing

All substance abuse testing administered by Milestone Contractor's, and Champaign Asphalt Company will include drug and/or alcohol screening. All entities also participate in random drug and alcohol screening administered by outside sources, such as CCS (Coalition for Construction Safety), ICI (Indiana Constructors Inc.) and BCRC (Building and Construction Resource Center, Inc.) All positive drug or alcohol screens may result in termination.

Substance Abuse Testing Procedures for Company Benefitted (non-bargained) Employees Initial Testing (Pre-Employment Post-Offer)

All new employees who are made a conditional offer of employment will be required to successfully complete a drug test prior to commencing employment.

Random Testing

Milestone employees selected for random testing will be contacted and advised when to report to the screening location.

Reasonable Suspicion Testing

Employees may be required to submit to alcohol and/or drug testing whenever their supervisor/manager has a reasonable suspicion that the employee is under the influence of alcohol or drugs based on the employee's behavior or physical symptoms or reactions upon the supervisor's/manager's request. Examples of reasonable suspicion may include but is not limited

to: physical symptoms consistent with substance abuse (e.g., staggered gait, slurred speech, smell of alcohol on breath, inability to focus, etc.); or evidence of illegal substance use, possession, sale or delivery. Refusal to consent will be construed as an independent violation of this policy and the employee may be subject to discipline up to and including immediate dismissal, after an evaluation of the particular facts and circumstances.

Post-Accident / Incident Testing

Any employee involved in an on-the-job incident or accident (i.e., causing the accident (and not being injured) or being injured as a result of the accident) which results in personal injury requiring medical treatment or damage to property (other than minimal) may be required to be tested for the presence of drugs or alcohol, unless the employer determines that the testing would not be appropriate under the circumstances. The employer would not require testing where the accident was very unlikely to have been caused by employee drug use (e.g., repetitive strain injury or bee sting). The employer will make the determination for testing at its sole discretion depending on the facts and circumstances of the case. The employee involved should abstain from using alcohol until after the determination is made. Refusal to consent will be construed as an independent violation of this policy and the employee may be subject to discipline up to and including immediate dismissal.

In instances of post-accident/incident or reasonable suspicion testing, the employee will be transported to the testing facility by the employer. At the option of the employer, the employee may be suspended pending the test result. In the event a negative test result is reported, the employee shall be compensated for all lost time at the employee's base rate, or as determined by a collective bargaining agreement, if applicable.

Annual Testing

All employees must be tested at least once per year. If an employee is not tested in one of the above scenarios, they will be scheduled for testing.

Positive Drug Test Results

- Individuals with a positive drug test result will be terminated. Eligibility for re-hire may be considered after a minimum of one year has elapsed.

Positive Alcohol Results

- Employees who have a Blood Alcohol Content (BAC) between .02-.039 will be suspended from work for a minimum of 24 hours.
- Employees who have a Blood Alcohol Content (BAC) measuring .04 or more will be suspended from work for a minimum of 30 days. Additional consequences, up to and including, termination of employment may also result, depending on the nature and severity of the infraction.

Diluted Results

- Employees will be contacted to retest per requirements established by testing authority.
- A second diluted test without medical reasoning will be considered positive.

Refusal To Test

- A refusal to take a drug/alcohol screen will be treated as a positive result, and result in immediate termination.

Drug Group

The drug-testing program will test for the following drugs at these levels:

Initial test analyte	Initial test cutoff	Confirmatory test cutoff concentration
Marijuana metabolites	50 ng/mL	15 ng/mL
Cocaine metabolite (Benzoyllecgonine)	150 ng/mL	100 ng/mL
Codeine/Morphine	2000 ng/mL	2000 ng/mL
Hydrocodone & Hydromorphone	300 ng/mL	100 ng/mL
Oxycodone & Oxymorphone	100 ng/mL	100 ng/mL
6-Acetylmorphine	10 ng/mL	10 ng/mL
Phencyclidine (PCP)	25 ng/mL	25 ng/mL

Amphetamines	500 ng/mL	250 ng/mL
Methamphetamine	500 ng/mL	250 ng/mL
MDMA (Ecstasy)	500 ng/mL	250 ng/mL
Barbiturates	300 ng/mL	200 ng/mL
Benzodiazepines	300 ng/mL	300 ng/mL
Methadone	300 ng/mL	300 ng/mL
Propoxyphene	300 ng/mL	300 ng/mL
Ethanol (Alcohol)	.04% w/vol	.04% w/vol

Union Employees (aka Bargained Employees)

Milestone Contractor's will adhere to collective bargaining agreements when administering drug testing. All entities also participate in random drug and alcohol screening administered by outside sources, such as CCS (Coalition for Construction Safety), ICI (Indiana Constructors Inc.) and BCRC (Building and Construction Resource Center, Inc.), as written in their respective bargaining agreements. All positive drug or alcohol screens may result in termination, even on the first offense.

Per the following:

- ICISAT – this testing program is applicable to those employees working in the following areas:
Indianapolis, Lafayette, Richmond, Columbus, Bloomington and Terre Haute areas. Contact Human Resources for further information regarding ICISAT testing.
- BCRC – this testing program is applicable to those employees working in the Griffith and South Bend Indiana areas. Contact Human Resources for further information regarding BCRC testing.

Applicable To Both Union And Non-Union Employees

Requirements For Submitting Results To CCS – Coalition For Construction Safety

- A copy of the chain of custody initiated at the time of collection must be submitted.
- Test results documentation must include panel cutoff levels – both screening and confirmation. (Exception – if documentation clearly indicates that the test was conducted according to DOT guideline).
- Date the specimen was collected and reported. Must be within the last 12 months.
- The MRO (Medical Review Officer) name and signature.
- The employee's first name, middle initial, last name, at least the last 6 digits of the employee's SSN. And their date of birth.
- Test result and date the result was verified by the MRO.
- The name of the SAMHSA certified lab that conducted the testing.

In Conclusion

Milestone Contractor's and will adhere to an Alcohol and Drug-Free Workplace Policy. Any employee who is forthcoming and admits to a Substance abuse problem prior to being identified through any form of substance abuse testing will be offered help; however, any employee who uses an EAP because of a positive drug or alcohol test will be subject to the conditions outlined in the testing portion of this policy and as set forth by the EAP counselor.

All information received by the employer because of drug or alcohol testing, including EAP counseling are to remain confidential, only those with a need to know should have access to those communications.

A refusal to submit to a drug and alcohol screen may result in dismissal and be considered a positive result. In addition, the following situations may also result in disciplinary action up to and including termination of employment:

- Failure to take drug or alcohol test in a timely manner.
- Failure to Appear for testing.
- Failure to accept the EAP recommendations when required to use the EAP due to a positive test or violation of a company rule pertaining to drugs or alcohol.

- Failure to report a work-related injury in a timely manner solely for the purpose of circumventing post-accident testing.

Subcontractor Safety Requirements & Expectations

It is Milestone Contractors' policy that all employees, including those employed by subcontractors are appraised of the hazards and potential hazards associated with Milestone projects. These general safety guidelines shall be used for all new employees and reviewed with subcontractors during pre-entry briefings prior to starting work on Milestone projects.

- **JOBSITE SAFETY PLANS:** All subcontractors must submit Job Site Safety Plans for all Milestone Projects.
- **COMPETENT PERSONS:** Each subcontractor must have a minimum of one competent person (as defined by OSHA 1910/1926) on Milestone jobsites at all times, when work is being carried out.
- **EMERGENCY PROCEDURES:** Report to Milestone representative any emergency, hazard, danger, unusual condition or injury immediately. Emergency telephone numbers are found on job boards, in field office and plant locations.
- **EMERGENCY EQUIPMENT:** First aid kits are available in the office, shops and in supervisors' vehicles. Fire extinguishers are available on site.
- **HAZARDS YOU MAY ENCOUNTER:** (Follow procedures in parenthesis)
 - Head Protection. (Hardhats are required on all projects at all times.)
 - Traffic. (Class III high visibility clothing must be worn at all times. Flaggers must be trained.)
 - Clothing. (Long pants, shirts with sleeves, Class III high visibility clothing and safety toe boots are required).
 - Moving machinery and conveyor. (Be alert and stay clear. Do not work on machinery or conveyors until chocked, blocked, cribbed, and all power sources are de-energized and locked out/tagged out.)
 - Foreign objects to the eye. (Safety eyewear is required to be worn at all times which may include safety glasses, spoggles, goggles and face shields.)
 - Welding flash burns. (Avoid areas where welding operations are being conducted, and do not look at flash.)
 - Noise. Employees working in areas of high noise such as drilling operations, jack hammering, and tank cutting (with air hammer or chisel) or any other area where noise levels exceed 85 dB for an 8-hour TWA must wear hearing protection. (OSHA Regulations at 29 CFR 1910.95).
 - Falling objects from above. (Wear hard hat and inspect the area above where you are walking or working.)
 - Falling or dropping heavy objects. (Wear safety-toed work boots to protect your feet.)
 - Tripping or falling. (Clear your work area of obstacles. Exercise extreme care when mounting and dismounting equipment or machines and when stepping over or around obstacles. Use three points of contact when mounting or dismounting equipment.)
 - Fire or explosion. (Do not smoke or use any flame-producing device around any storage areas of gasoline, fuel, lubricants, compressed gases, explosives, or other flammable or combustible substances.)
 - Electrical. (Avoid all contact with all-electrical apparatus or power conductors and sources. If working on electrical equipment de-energize the equipment, lockout and tagout the power source in the off position. Use GFCI or double insulated tools as applicable.)
 - Fumes from welding or vapor from engine exhaust. (Avoid areas or prolonged stays in areas where welding fumes or engine exhaust are generated, use approved respirators for these atmospheres.)
 - Injury from lifting. (Use correct lifting procedures to avoid injury.)

- Weather. (Avoid working during lightning and severe weather. Make sure that any snow or ice has been removed from your work area or covered with a material to provide a safe footing.)
- Trenching/excavations. (Slope according to soil classifications. Where trench boxes are used, make sure trench box extends 18" above top of excavation. Store spoil pile at least 2' from edge of excavation. Ensure proper access and egress per 1926.650)
- Confined spaces. (Monitor atmospheric conditions before entering and during occupancy, retrieval systems should be used where required.)
- Fall protection. (Use fall protection when working at heights at or above 6' or 4' at plant facilities.)
- Jackhammering. (Use metatarsal guards in conjunction with safety-toed work boots, as well as silica abatement practices per OSHA's Table 1.)
- Moving vehicles and equipment. All Employees, Subcontractors, Suppliers, Owners/Owner's Representatives, Inspecting Agency Representatives and any other entity that is involved in any way with the onsite project, shall stay out of the direct line of equipment operations by a minimum of 10-15' if possible, when moving overhead loads or performing excavations refer to OSHA 1926.651(e), which states that no personnel shall be directly under overhead loads.
- Truck traffic and occasionally heavy equipment will be encountered. (Use normal or standard traffic patterns unless signs indicate otherwise. Use safe speeds and keep vehicle under control at all times. Do not follow other vehicles too closely.)
- Parking in designated areas only. (Do not park directly behind or on the blind side of equipment. Set your parking brake and shut off the engine. Be sure that your vehicle will not roll.)
- Over the road haul trucks may encounter collision hazards at stockpiles and load out locations. (When approaching heavy equipment, be sure the operator knows you are there. Truck drivers must avoid the area directly behind where the loader is working to prevent being backed into. Back into the stockpile keeping watch for other trucks behind and stay in the cab of the truck being loaded to avoid being run over by other trucks or loader and to avoid being covered by material from loader bucket.)
- Report any unusual conditions to a Milestone representative.
- Chemicals and Materials (Subcontractor must provide SDS for all chemicals onsite to Milestone upon request.)
- Locates. (Subcontractors doing ground disturbing activities are responsible for their own locates).

Note: Random Jobsite Safety Inspections will be conducted.

Worker's Compensation Procedures

All work-related incidents and injury must be reported to a supervisor the day of the occurrence and should be documented via Milestone HCSS Safety reporting. Reporting should be done even if the injury is not thought to be serious at the time.

- First Aid supplies should be accessible at all job sites for any minor injuries.
- If medical attention is required, the supervisor should communicate with the area Safety Representative and accompany the employee to the designated clinic for attention. A substance abuse screen will be done at the time of treatment. Employees must be seen at Milestone designated medical provider. **Employees seeking medical attention on their own for a workplace injury will not be reimbursed.**
- All follow-up appointments must be attended. If an appointment cannot be kept, the clinic or doctor should be called to reschedule.
- The Safety/Claims Specialist should be kept informed of any progress, including any lay-offs, terminations, or suspensions of an employee who is receiving medical care under worker's compensation.
- All documentation and bills should be forwarded to the Safety/Claims Specialist, at the Perimeter Road Office.

- If an employee has been put on any restrictions due to a work-related injury, those restrictions should be accommodated when possible. The employee should not be allowed to work outside of their restrictions.
- If the restrictions cannot be accommodated at the job site, the Safety/Claims Specialist should be notified. If another position is not available within Milestone's workforce, the employee will be considered for a modified work program. In some cases, it will be necessary for the employee to be off work until the restrictions have been lifted.

Return To Work

In order to return employees injured in a work-related incident to work in a timely and efficient manner, the supervisor shall comply with the following guidelines:

- An employee who has been taken off work or placed on restrictions for a work-related injury should not be allowed to return to full duty without a signed release from the doctor. It is the responsibility of the supervisor to obtain this release and forward it to the Safety/Claims Specialist.
- If an employee is injured in a work-related incident and sent to the clinic for treatment, the treating physician will determine if the employee is to be taken off work or if they can return to work with restrictions based on the injury received.
- If the physician has taken the employee off work, the Safety/Claims Specialist will monitor time off with supervisor to ensure timely return to work. Supervisors shall stay in communication with the Safety/Claims Specialist regarding the status of the effected employee.
- If the physician has placed the employee on restricted duty, the supervisor is responsible for finding work within the restrictions. The area safety representative will assist in coordinating restricted duty.
- Milestone will make every effort to accommodate employee restrictions. Examples may include but are not limited to: Temporary transfers to an office setting, until the restrictions are lifted. It is the supervisor's responsibility to communicate with the Safety Representatives and the Safety /Claims Specialist to accommodate all restricted employees.
- The Safety/Claims Specialist will track all lost and restricted time. Information relating to lost and restricted time is entered into HCSS Safety and tracked via the weekly safety update spreadsheet.
- Lost or restricted time is charged to the job where the employee was injured even when the employee is placed on restricted work at another location.
- If the employee has been taken off work, a release from the physician is needed before the employee can return to work whether returning to restricted duty or full duty. This release must be approved by the Area Safety Representative and Safety/Claims Specialist prior to the employee returning to their duties.

Injury/Incident Reporting & Management

Injury Reporting

This procedure establishes responsibilities and methods for reporting, documentation and management of injuries and events for Milestone employees and/or subcontractors in accordance with project requirements.

- This procedure applies to all work-related incidents, events, injuries, illnesses, near-miss incidents and damage to property with injury occurring in support of Milestone projects for Milestone and subcontractor employees.
- All injuries must be reported via the Employee Injury/Illness Report, including those for record purposes only.

Definitions

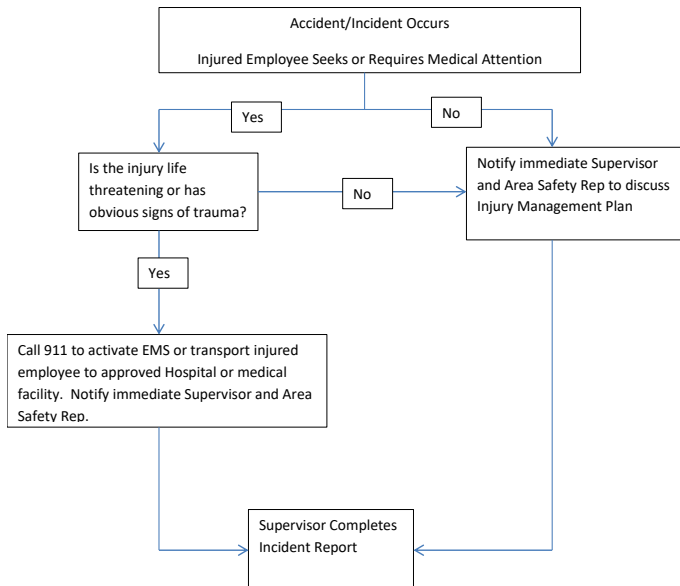
- Recordable Injury - An incident that requires medical treatment beyond Standard First Aid and involves second or subsequent visits to medical personnel, restriction of work or motion,

lost workdays, transfer to another job or given prescribed medication. Such definition is pursuant to 29 CFR 1904.12.

- Minor Injuries - Those injuries requiring first aid treatment.
- Events – Incidents where no injury or minor incidents not requiring first aid, such as falls, minor abrasions, etc., may result in future issues.
- Near Miss – An incident which did not result in personal injury, illness or property damage but had the potential.

Responsibility

- Affected Employee – Report all incidents or injuries to the Supervisor immediately, no matter how slight, which occurs at and is related to work; or reports to the Superintendent if the supervisor is not available. Also, report all non-work-related incidents/injuries which may be impacted by work activities.
- Supervisor – Notifies the General Superintendent and Safety Representative.
- The Safety Representative will evaluate the incident and direct care, while communicating with the Safety Claims Specialist.
- The Safety Representative is responsible for directing and managing on the job injuries and illnesses and notifying Management. When employee occupational injury or illness requires medical attention beyond First Aid, the Safety Representative or their designee should accompany the employee to the medical facility.
- The Safety Representative will contact Medcor, to seek medical direction, for onsite first aid or questionable injuries which may be treated with first aid.
- All injured employees will be given a card in person or electronically outlining steps for after-hours care along with Safety Representative contact information. This is especially important for employees who feel treatment is unnecessary and self-treat first aid incidents.
- Clinic/Hospital shall be given the Safety Claims Specialist's contact information and Milestone's mailing information, along with the Representative/designees contact information.
- The accompanying representative/designee will stay with the employee until a diagnosis and treatment plan has been established or the employee is admitted for care. Employees should only be released to representatives/designee or contacted family/friend upon leaving the medical facility.
- Injured employees are responsible to keep their Supervisor/Safety Representative and Safety Claims Specialist abreast of all treatment, prescriptions and future appointments.
- Onsite Superintendent will complete Employee Injury/Illness Report form for each incident and turn into the Safety Claims Specialist within 24 hours and complete the following as required:
 - Witnesses – identify and record the names, addresses and telephone numbers of individuals who witnessed the incident.
 - Signed Statements – when possible, obtain a statement prepared and signed by the incident victim and/or witnesses.
 - Preserving Incident Scene – when possible, preserve the incident scene. Allow only personnel necessary to the investigation to enter the area. Unless necessary to prevent further damage or injury, clean up or repair activities should commence only when it is assured that all-pertinent information has been collected.
 - Photographs of Incident – Take numerous photographs from different perspectives. Draw measured diagrams, where appropriate, of the incident scene.
 - Safety/Claims Specialist –Tracks and logs incidents on OSHA 300 logs, processes workman's compensation claims and consults the Safety Department on the validity of claims. Distributes the incident report to the COO, Regional Presidents, Area Managers, General Superintendents, Safety Team, Insurance File and others as deemed necessary.
- Any employees involved in incidents involving blows to the head or electrical shock must be transported to an MCLP approved clinic for evaluation.
- If injuries/illnesses are not work related, please notify your Safety Representative so that it may be documented properly.



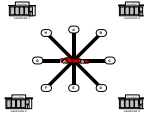
Property Damage/Incident Reporting

It is the responsibility of the Project Superintendent/Foreman or Project Manager to report the incident to the Area Safety Representative and then enter the incident into HCSS Safety. General Superintendents will be held accountable for the failure of subordinates to properly report incidents.

NOTE: Our third-party investigator, Alliance Security, NC, shall be notified as soon as possible, where **third parties are involved in a motor vehicle incident**, such as multi-vehicle incidents, injuries, fatalities or major property damage. Contact Kelly Flick at 317-213-6533. Other incidents shall be determined by the Superintendent, Safety Manager, or Area Manager.

- All incidents, including theft, require the following, as applicable: 1) Milestone HCSS Report Investigation, 2) Photographs, 3) Diagram of the incident and estimated dollar amount, 4) Witness information - Internal & External, and 5) Police Report.
- Milestone HCSS Incident Report must be filled out for any injury, utility line cut, theft, property damage, motor vehicle incidents or other incidents for record purposes only.
- Submit any daily reports, detailed narratives, estimates, and photos pertinent to the incident.
- It is the responsibility of the Project Superintendent or Supervisor to take pictures of any incidents, property damage, vandalism/theft, injuries, marked locates that may incur legal liabilities, along with all Traffic Set-ups and Traffic Set-up changes.
- Photos should also be taken on any work-related situation that may possibly impact performance, including documentation of any potential claim for extra work, change order, delay, etc. including subcontractor's work.
- Pictures of any incident should be taken using the following format at a minimum. **You Can Never Take Too Many Pictures!**
- Pictures should be taken from 8 different angles and of as many surrounding, permanent landmarks that will give a point of reference such as a store, street sign, building, etc.

- As you photo objects you should construct a photograph index to be turned in with the photographs. It may be as simple as say "Picture 1 – East Side of Vehicle, Picture 2 – Village Pantry directly East of the vehicle on Washington St., etc.
 - Other pictures that may be taken are:
 - Skid marks
 - Gouge marks in roadway
 - Traffic Control Devices
 - Close ups of front and back of vehicles, to include tire shots, which may show the degree of skidding that occurred.
 - Any road hazards such as chuckholes, drop offs, etc. that may have contributed to the incident.



- Any other contributing factors.
- The photos should be sent to the Safety/Claims Specialist via HCSS or email immediately.

Incident/Injury Investigation Review

The intent of this policy is to establish root causes and develop procedures to prevent reoccurrences, determine training needs, and to reinforce that unsafe behavior is unacceptable.

Incident Investigation

- Incidents will be investigated and may include, but are not limited to: near misses, first aid/recordable injuries, utility line cuts, equipment damages, or backing incidents.
- The Investigation Team may consist of a Safety Representative, General Superintendent, Project Superintendent, Supervisors, involved Employees and Area Management.
- HCSS investigation items shall be completed by the Area Safety Rep.
- A copy of the completed final investigation form shall be directed to Senior Management for final review and Evaluation.

Evaluation

- Failure to comply with a Milestone Best Practice, commonly accepted work practices or applicable regulations on Recordable Injuries or General Liabilities will be determined to be "**At-Fault**". All other incidents shall be determined to be "**Not-At-Fault**".
- The Investigation Team shall recommend either an At-Fault or Not-At-Fault determination to Management. **Final determination shall be made by Management.**

Resolution

- **No disciplinary action will be taken for Not-At-Fault Incidents.** Incidents where a Best Practice or Regulation does not exist will initiate the development of a Milestone Best Practice.
- Employees with an At-Fault incident may be called to meet with Management to discuss the Incident, including a review of the employee's safety record.
- Disciplinary actions for At-Fault incidents will follow the Milestone Employee Conduct and Performance Policy and may result in any of the following, as determined by Senior Management:
 - Counseling by immediate supervisor/verbal warning
 - Written warning
 - Suspension
 - Termination
- Milestone leadership at all levels shall be evaluated and held accountable for At-Fault Incidents within their teams.

Crisis Management Plan

This policy outlines Milestone Contractor's plan for responding to emergency or crisis situations. Activate this Crisis Management Plan ONLY for situations that require emergency actions to protect the health and safety of Heritage Construction employees, the general public, or the environment. Possible emergency situations are listed below, although other situations may arise that will require activating this Plan.

- **Severe Employee or *Third-Party Injury or Fatality**
- **Cave In** – Trenches, Retaining Walls, Structure Collapse, etc., trapping employees or others
- ****Chemical/Environmental Spills** which occur on Heritage Construction sites, i.e., tanker trucks
- **Major Fire** – Electrical, Chemical or Fuel based, etc.
- ****High Volume Utility Line Cuts** such as gas, diesel or electric utilities that may place employees, the public or the environment in immediate danger.

***Note:** Our third-party investigator, Alliance Security, NC, shall be notified as soon as possible, where **third parties are involved in a motor vehicle incident**, such as multi-vehicle incidents, injuries, fatalities or major property damage. Contact Kelly Flick at 317-213-6533. Other incidents shall be determined by the Superintendent, Safety Manager, or Area Manager.

****Note:** Bob Beyke, Environmental Affairs Manager shall be notified at 317-695-8409 for any spillage of a petroleum or petroleum-based products on Heritage Construction sites, public roadways, or in or near a body of water.

The intent for Milestone Contractor's in dealing with any emergency is to control the situation to the best of our ability. Our first course of action should be as set forth in the following order by the onsite supervisor:

- The Supervisor shall call 911, if police, fire, rescue, or ambulance services are needed and call the utility directly involved should services need to be shut off immediately. (If unsure and time permits call your immediate supervisor for direction.) A co-worker may be designated to make either call depending on the situation or impending dangers.
- The 911 caller is to remain on the line until dismissed by the 911 Operator.
- Gain control of the situation.
- Secure the site to avoid further damage or injuries, "if emergency situation allows", if not evacuate immediately.
- If it is safe to do so, and you have been trained begin First-Aid/CPR.
- Ensure that all employees are accounted for. Move employees to a safe, secured location away from emergency personnel. Do not leave until released by the onsite supervisor.
- Call immediate Supervisor and Safety Representatives.
- Set-up perimeter control around the emergency site. Only emergency response personnel will be allowed into the site.
- Gather available information.
- Designate a second safe, secure, area for the news media. This will also provide the avenue for accurate communication/information to and from the media.
- Assist media while keeping them out of the way of emergency operations.
- Communication of information to media will be delivered by the area officer only.

Jobsite Supervisor - The Jobsite Supervisor should not make any statement to the news media. All efforts should be put forth by the Supervisor to assist Emergency Response Agencies, the public and Heritage Construction employees, until the emergency is brought under total control.

- Should the jobsite Supervisor be put in a situation that he/she has to address the media, do not "Decline Comment" or say, "No Comment". The following statement may be made.
- *"The Area Manager (Name & Title)", will be here within the hour to make a statement. Please be patient, thank you."*

Superintendent – The Superintendent, upon arrival, will take over as team leader of the emergency. The following items shall be directed by the Superintendent:

- Gather information from onsite supervisor.
- Determine "What happened, where it happened, and who is involved".
- Determine if site should be shutdown.

- The Superintendent shall determine if the Alliance Security, Inc. should be notified.
- The Heritage Group (THG) should be notified in the event when a third party, such as the public or subcontractors, are involved and injuries, fatalities, large property damages or spills have occurred.
- Notify the Area Manager of the incident.
- Notify the Prime Contractor if we are a subcontractor.
- Notify the Project Owner Representative.
- Assist media while keeping them out of the way of emergency operations.
- A Statement may be made as outlined below:
 - Do not "Decline Comment" or say, "No Comment".
 - The following statements are acceptable and may be made until the designated Manager has arrived to make a formal statement:
 - "Our first concern is the safety of our employees and the public. "
 - "The incident is under investigation and we are cooperating with the appropriate authorities. "The Area Manager (Name & Title)", will be here within the hour to make a formal statement."

Safety Representatives shall:

- Notify the appropriate agencies as applicable, OSHA, EPA, IDEM, etc.
- Inform any surrounding civil entities that may be affected by the incident.
- Inform other area offices of the situation.
- Assist in emergency management.
- Document the scene and gather information.

Area Manager - Upon arrival the Area Manager will take over the crisis and proceed as Spokesperson for the Heritage Construction Group. The Superintendent will remain on site to assist. The Manager will:

- Notify the Regional Manager who in turn will notify the COO.
- Notify the Receptionist on where to route calls.
- Establish a list of media in attendance.
- Establish site access for appropriate personnel at the site.
- Assemble necessary background literature.
- Anticipate media questions.
- Designate someone (Receptionist) to screen media calls for the spokesperson.
- Make a formal statement to the media.
- Notify Legal Counsel.
- The area leadership shall determine if grief counsel should be summoned.

Formal Statement Outline To Be Made By Area Management or Their Designee

A [fatal collision, fire, explosion] took place at [time, day, and date] at [business, intersection, road].

We regret that [one Employee, two motorists, the Any St. facility] was/were [injured, impacted, inconvenienced] by the incident.

Milestone Contractor's emergency response plan was activated and resources from [fire department, EMS, local law enforcement] were called to the scene.

An investigation into the root cause of the incident is underway. We are [working to notify family, cooperating fully with authorities, utilizing all available resources] at this time.

(if we are at fault... Since Milestone Contractor's formation in 1994, [safety, our people, quality construction] have been at the heart of how we do business. We commit to doing our part to ensure [the issue] is addressed to the best of our ability. We have already begun to evaluate our processes to determine if there is anything we can do differently to avoid this situation occurring again in the future.)

Further updates will be provided as additional information becomes available.

Notification Reference Sheet

In the event of:	911	General Superintendent	Safety Representative	Third Party Investigator 317-213-6533	Bob Beyke 317-695-8409 (If not available contact Area Safety Rep)	IDEM 888-233-7745	THG Emergency Spill 800-487-7455	THG Rapid Response
Fatality	Call 911	X	X					X
Severe Employee or Third Party Injury	Call 911	X	X	X				X
Non-Severe Third Party Incidents Requiring A Police Report	Call 911	X	X	X				
Cave In/Collapse Trapping Employees	Call 911	X	X					X
Chemical/Environmental Spills (That leave the site or have potential too.)	Call 911	X	X		X	Contact As Directed	Contact As Directed	X
Major Fire	Call 911	X	X					X
High Volume Utility Line Cuts (Petroleum/Electric that may place the persons/property in danger.)	Call 911	X	X					X
Work Place Violence with police involvement	Call 911	X	X					X

Note - When Spills are reportable: (All plant locations have spill cleanup materials.)

- 1) Spills that damage the waters of the state so as to cause death or acute injury or illness to humans or animals, or
- 2) Spills of petroleum when the amount spilled exceeds fifty-five (55) gallons in an area delineated as a public water supply wellhead protection area, or
- 3) Spills that damage waters of the state and are located within fifty feet of a known private drinking water well, or
- 4) Spills of petroleum of such quantity as to cause a sheen upon the waters, or
- 5) Spills of petroleum exceeding fifty-five gallons where the spill is to soil beyond the property boundary, or
- 6) Spills of petroleum exceeding one thousand gallons where the spill is to soil within the facility boundary, or

Company Vehicle Policy

Vehicle Use - Milestone provides company vehicles to five (5) general areas of employment; Project and Job Superintendents, Hourly Superintendent; Foremen, Mechanics, and Job Trucks. General Superintendents are responsible for distributing/recalling vehicles and communicating the established guidelines and applicable general rules.

- Project and Job Superintendents who are on Company benefits, Trucks are to be used for carrying out assigned work duties and Milestone job related duties. Superintendents may have personal use privileges year-round. Trucks are to be used in Indiana only, unless Area Management approves otherwise.
- Hourly Superintendent Trucks are to be used for work only. Hourly Superintendents have possession of their trucks 24 hours per day, while receiving compensation as an Hourly Superintendent. Trucks may be used for transportation from home to assign work area and back home at night (no personal use). Trucks shall be turned in immediately when supervisory duty ends.
- Foreman Trucks shall remain on the job site except as authorized by area management. (No personal use)
- Mechanic Trucks and service trucks shall be used for the sole purpose of carrying out assigned mechanical and equipment service duties. Trucks may be used for transportation from home to be assigned work area and back home at night as determined by the Shop Manager. All trucks shall be kept in the area yard when not in use.
- Job Trucks may be used on specific jobs as needed when approved by Area Management. Job trucks shall always remain on the job site while assigned to the job, except when used for company related business errands. When job trucks are no longer needed, they will be returned to the area equipment storage yard. Job trucks will be assigned to and will be the responsibility of the Project or Job Superintendent.
- Estimating, Marketing and Safety Representatives company lease vehicles are provided by The Heritage Group and covered under their Company Vehicle Policy.

Driver Eligibility and Conduct - it is the policy of Milestone that all operators of company vehicles and all those driving personal vehicles on company business shall drive in a safe and lawful manner.

- This policy applies to Milestone personnel driving a company owned or leased vehicle, and to those receiving compensation through the MOTUS program or any other program, while operating the vehicle for company business or personal use of a company vehicle.
- Milestone owned/leased vehicles must be operated by a Milestone employee who holds a valid operator's license for the state in which they reside and have an acceptable driving record per Milestone's requirements.
- Drivers must be at least 18 years old.
- Drivers shall have an established MVR (Motor Vehicle Record) File and shall not have been disqualified under Milestone's requirements.
- All employees with valid driver's license are subject to MVR monitoring and changes in driving privileges will be communicated to the Area Manager/General Superintendent.
- At no time shall another person be allowed to operate or use a company owned or leased vehicle for personal use. This does not apply to personnel receiving compensation through the MOTUS program or any other program.
- Personal Trailers, Boats etc... shall not be towed/pulled behind company cars or trucks except for those receiving compensation through the MOTUS program for personal vehicle use.
- Only Milestone associates or project related personnel; customers, engineers, subcontractors, etc., shall be permitted to ride as passengers in Milestone owned vehicles.
- In the possible event that Non-Milestone associates, project related personnel, customers, engineers, subcontractors etc... are to be in a Milestone owned vehicle, the driver is FULLY responsible for the liability that they carry, such as proper seat belting and insurance to cover passengers.
- No passengers shall be permitted to ride in pickup truck beds at any time.
- The purchase or consumption of alcoholic beverages, illegal drugs, controlled substances, or the abuse of prescribed drugs, reckless driving, irresponsible driving, or vehicle abuse is strictly prohibited. This includes empty alcoholic containers. Violators will be subject to disciplinary action to include immediate dismissal.
- Vehicles are subject to condition, integrity and road-worthiness inspections by a Milestone Mechanic and Shop Management or Safety and may be declared out-of-service until such defects are corrected. A driver should also inspect DAILY at a minimum standard overall condition and report any issues that arise promptly to the Shop Manager and immediate Supervisor.
- Assigned drivers shall inspect their vehicle for defects DAILY prior to use. If an issue arises the issue needs to be brought to the attention of the Shop Manager or Area Mechanic.
- Drivers and operators are responsible for the safe actions of their vehicle/equipment. There shall be NO BACKING as a first movement of equipment and vehicles. Plan your first movement in a manner that conforms to this policy. All starting movement should be going forward at least the length of the vehicle or equipment, where feasible.
- Employees who violate this policy will be subject to disciplinary actions per Section "Managing Driver Performance".

Milestone Vehicle Maintenance will be the responsibility of the individual assigned the vehicle.

- Change oil and filter every 7,500 miles.
- Use an approved service center designated by the Area Shop Manager or Foreman. Service prices and discounts have been arranged with Jiffy Lube service centers.
- If you paid for service rather than using the house account - Code the charge to your truck number and sign the receipt. Send the signed receipt to the Area Shop Manager or Foreman. NOTE: If an approved service center is not available in your area, you may use another service, only after seeking approval from the Area Shop Manager or Foreman. At no time should the employee service their own vehicle.
- Services beyond an oil change (i.e., transmission service, replace air filter, wiper blades, etc.) must be authorized by the Area Shop Manager. Company mechanics can provide items such as air filters, replacement fluids, and wiper blades.

- Project or Job Superintendents assigned a Job Truck are responsible for oil changes on those vehicles. General superintendents are to make truck assignments.
 - All Milestone Motor Vehicles must be maintained in good mechanical condition.
- Driver Responsibility** all employees are personally responsible for their driving performance. Managers shall ensure that the driving performance of their employees complies with the policies set by Milestone Contractors. The Safety Department will assist in recommending alternate sources of training.

Minimum Requirements Vehicle Program – Safety Representatives or designee shall ensure that prospective employee drivers have acceptable driving records. Drivers who do not meet these guidelines shall not be hired. Other employees with unacceptable records shall not be permitted to drive company vehicles.

Managing Driver Performance - Drivers of company vehicles, those on MOTUS and other reimbursement programs must comply with driver performance requirements. Driver performance is based on both the operations of a company vehicle/equipment and personal vehicle.

- No employee driver shall be hired who has a suspended license and no employee with a suspended or conditional license will be permitted to drive a company vehicle.
- Continuous MVR monitoring will be conducted per the Safety Department and all applicable changes communicated to the appropriate manager.
- Moving Violations:
 - 3 Moving Violations within a 3-year time span - are subject to probation for one year.
 - Additional moving violations during probation will result in driving privilege suspension for 90 days.
- DWI/DUI/OWI/OUI, Leaving the Scene, Reckless Driving or committing a crime with a motor vehicle.
 - Such offenses require a minimum loss of driving privileges for 365 days or termination.
 - Vehicle Collisions - At Fault Incident: If an employee is involved in more than one incident that causes property damage and/or personal injury, the employee will lose driving privileges for 180 days at a minimum (or other length as deemed by the BMV) or termination.

NOTE: Individuals involved in any of the above to include 3 Moving Violations, DWI/DUI/OWI/OUI/Leaving the Scene, Reckless Driving or multiple At Fault vehicle incidents etc., will be subject to incident investigations and remedial training as determined to fit the situation and will be required to take a State approved BMV Driving Course at their own expense within 30 days of Disciplinary Action. Failure to comply will result in loss of driving privileges.

- Reporting Incidents, Moving Violations (to include Speeding Tickets), Expirations, Suspensions, and changes in license status. This includes those citations received in a personal vehicle. Employees who fail to report changes in driver's license status will face disciplinary action to up to and including dismissal.
 - Moving Violation: All drivers of company vehicles and MOTUS must report all moving violations no later than the next working day. Reports are to be made to the employee's supervisor. Employees are responsible to notify Milestone of all convictions resulting from moving violations.
 - Suspension/Expired Licenses – when an employee's driving privileges are revoked, suspended, or expired, per the State issuing the license, it is the employee's responsibility to notify Milestone immediately and cease operation of any Milestone owned vehicle. Any employees with suspended or expired license will not be permitted to drive personal vehicles for business purposes under any Milestone reimbursement program.
 - Employees who have a change in license status such as restrictions of any kind, conditional license, loss of CMV (Commercial Motor Vehicle) Endorsement, etc., must notify Milestone at the time of the change and give reason for the change. Driving privileges will be pending per Management review. Restrictions and Endorsements are defined per the Indiana BMV.

- Moving Incident Investigation: Managers and the Safety Department shall investigate moving incidents involving employees driving company vehicles as specified in the Milestone Incident Investigation Policy, depending upon severity.

Employees with Suspended Driving Privileges:

Current employees who violate the criteria outlined in the company vehicle policy and have driving privileges suspended have the following option:

- Must provide proof of insurance prior to reimbursement which meets Milestone program requirements.
- Employees will be reimbursed for mileage when using their personal vehicle for company use. Prior approval required by Area Management and or Division Management.

Emergency Weather Plan

If a Weather Warning or Tornado Watch is issued in the area or lightning is observed, the onsite supervisor or his designee will verify if a warning is in effect, by weather apps or other resources.

Using a weather application determine the distance of lightning and path of the storm which must be at least 12 miles away for work to continue.

Lightning strikes must be monitored and when it is within 10 miles all work shall cease and employees should take cover in vehicles or buildings as necessary for at least 30 minutes until the storm has moved to a further distance.

Lightning: What You Need to Know

Outdoor Lightning Safety

- If you hear thunder, lightning is close enough to strike you.
- When you hear thunder, immediately move to safe shelter: a substantial building with electricity or plumbing or an enclosed, metal-topped vehicle with windows up.
- Stay in safe shelter at least 30 minutes after you hear the last sound of thunder.

Indoor Lightning Safety

- Stay off corded phones, computers and other electrical equipment that put you in direct contact with electricity.
- Avoid plumbing, including sinks, baths, and faucets.
- Stay away from windows and doors and stay off porches.
- Do not lie on concrete floors, and do not lean against concrete walls.

Last Resort Outdoor Risk Reduction Tips

If you are caught outside with no safe shelter anywhere nearby the following actions may reduce your risk:

- Immediately get off elevated areas such as hills, mountain ridges or peaks
- Never lie flat on the ground
- Never shelter under an isolated tree
- Never use a cliff or rocky overhang for shelter
- Immediately get out and away from ponds, lakes, and other bodies of water
- Stay away from objects that conduct electricity (barbed wire fences, power lines, windmills, etc.)

Tornados or Storms - When conditions develop or warning sirens sound, the supervisor will act on the side of safety. If a warning is warranted:

- Field supervisors shall notify their employees to take cover immediately in an onsite building or low-lying area or vehicle depending on what the conditions warrant.
- Officer Personnel should announce the following as applicable:
- We are under a [Blank] (This may be either a tornado watch, snow advisory, etc.)
- Severe Weather conditions have developed.

In case of Tornado add the following message:

- Move away from the windows.
- Close overhead doors in the shop and storage buildings.

- All persons proceed immediately to your designated Safe Area (Repeat).

Bloodborne Pathogens

The purpose of this document is to eliminate or minimize employee occupational exposure to blood or certain other body fluids. This plan will provide information and training to protect employees from the health hazards associated with bloodborne pathogens and ensure compliance with the OSHA Bloodborne Pathogens Standard, 29 CFR 1910.1030. This document applies to all Milestone Contractor's offices, plants, facilities, and job sites.

Definitions

- **Approved Disinfectant:** Means a bleach/water solution in a ratio of 1:10 or any commercially available disinfectant.
- **Blood:** Means human blood, human blood components and products made from human blood.
- **Contaminated:** Means the presence or reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.
- **Covered Employee:** All employees who may have any reasonably anticipated skin, eye, mucus membrane, or parenteral contact with human blood or other potentially infectious materials (OPIM), that may result in the performance of their duties.
- **Decontamination:** Means the use of physical or chemical means to remove, inactivate, or destroy, bloodborne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles and the surface or item is rendered safe for handling, use or disposal.
- **Engineering Controls:** Any controls such as sharp disposal containers, self-sheathing needles, that isolate or remove the bloodborne pathogens hazard from the workplace.
- **Exposure Control:** A specific eye, mouth, mucus membrane, non-intact skin, or parenteral contact with blood or OPIM that results from the performance of an employee's duties.
- **Hand Washing Facility:** Means a facility providing an adequate supply of potable water, soap, and single use towels and hand sanitizer.
- **Occupational Exposure:** Any reasonable anticipated skin, eye mucous membrane, parenteral contact with blood, or OPIM, that results from the performance of an employee's duties.
- **Other Potentially Infectious Materials (OPIM):** Any of the following body fluids: semen, vaginal secretions, cerebrospinal, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, fluid contaminated with blood, all body fluids in situations where it is difficult or impossible to differentiate between fluids, infectious disease containing cells, any unfixed tissue or organ from a human (living or dead), tissue, organ cultures, disease containing culture medium, or blood organs, tissues from experimental animals infected with disease.
- **Parenteral:** Piercing of mucous membrane or the skin barrier through such events as needlesticks, human bites, cuts, and abrasions.
- **Regulated Waste:** refers to any: liquid or semi-liquid, OPIM, contaminated items that would release blood or other potential infectious materials in a liquid or semi-liquid state if compressed, caked or dried blood capable of releasing these materials during handling, contaminated sharps, pathological and microbiological wastes containing blood, medical wastes as defined in the Medical Waste Management Program of the Illness and Injury Prevention Program (IIPP).
- **Responsible Person:** Means any person(s) trained in the control or disinfection procedures, disposal procedures, of any materials suspected to be contaminated with bloodborne pathogens.
- **Source Individuals:** Any individual (living or dead) whose blood or OPIM may be a source of occupational exposure to the employee.
- **Universal Precautions:** A mandated approach to infection control, i.e., all human blood and certain body fluids are treated as if known to be infectious for bloodborne pathogens.
- **Work Practice Controls:** Controls that reduce the likelihood of exposure by altering the way a task is performed (e.g., prohibiting recapping of needles).

Responsibilities

Employees

- Know what tasks they may perform that have potential occupational exposure.
- Report any suspected exposures.
- Take responsibility for following all applicable provisions of this plan.
- Report all unsafe conditions related/involving bloodborne pathogens to the Supervisor and the Safety Representative.

Supervisor(s)

- Identify tasks and procedures where employees may encounter blood or other OPIM.
- Ensure that all employees implement and follow the compliance methods as outlined in the Exposure Control Plan.
- Ensure that the workplace is maintained in a clean and sanitary condition through establishing and implementing a written program of cleaning and disinfecting.
- Ensure that all departmental personnel are trained as required by the bloodborne pathogens plan.

Safety Representative

- Ensure that supervisors are trained to recognize BBP hazards.
- Ensure that all employees have access to this plan.
- Ensure that all compliance methods have been implemented.
- Audit the BBP plan annually.

Worker's Compensation Coordinator

- Assist the Safety Representative in establishing emergency protocols in case of incidental exposures to bloodborne pathogens.
- Provide for immunization with Hepatitis B vaccinations.
- Coordinate with designated health care provider to develop policies and procedures for immunizations and post-exposure care.

Exposure Determination

The Supervisor(s) shall perform an exposure determination for employees associated with their daily task during the daily huddle's (JHA) hazard identifications.

Methods of Compliance

The following methods shall be used to eliminate or minimize exposure to bloodborne pathogens:

- Universal Precautions.
- Establishing appropriate Engineering Controls.
- Implementing appropriate Workplace Controls.
- Using necessary PPE.
- Implementing appropriate Housekeeping Procedures.

Universal Precautions

Universal Precautions shall be observed to minimize or eliminate contact with blood or OPIM. All blood or OPIM will be handled as if infectious regardless of the perceived status of the source individual.

Engineering Controls

Engineering controls should be the primary method used to prevent occupational transmission of infectious disease. Engineering Controls shall be used whenever feasible to reduce the danger of bloodborne disease transmission. Engineering Controls that shall be used include:

- Biohazard bags and containers for waste and contaminated equipment and laundry. PPE shall be provided at all locations where they might be needed. All bags must be red and labeled with the biohazard label.
- Areas for containers must be designated for the collection of used PPE for disposal or laundry.
- All general waste garbage bags shall be clear or translucent plastic.
- Shield respirators shall be available for designated personnel who might have to administer artificial respiration.
- Handwashing facilities, eyewashes, and/or showers shall be provided as close as possible to the work area where personnel may incur exposure to blood or OPIM. Where they cannot be

supplied near the work site, or nature of the work is such that it is mobile, then alternative and equally effective emergency cleaning and disinfecting supplies shall be made available.

Work Practice Controls

Work practices shall be developed for all procedures and work performed. At a minimum, the following work practices must be implemented:

- Employees must wash hands as soon feasible (immediately if possible) after removing potentially contaminated gloves or any other PPE. Whenever antiseptic hand cleaners or towelettes are used, employees must wash their hands with soap and running water as soon as feasible.
- Eating, drinking smoking, applying cosmetics, lip balm, and handling contact lenses are prohibited in areas where there is the possibility of exposure.
- Potentially contaminated broken glassware should be picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.) and disposed of in sharps containers or equivalent. Broken glass that is not suspected of contamination shall be picked up in the same manner and disposed of in a separate container (such as heavy cardboard), clearly identified as "Broken Glass", to prevent incidental injuries.
- If leakage is possible from a primary container, then secondary leak-proof containers shall be provided for collection, transportation, and storage. These containers must also be labeled with the biohazard warning.

Upon exposure to blood or OPIM, the following steps must be taken:

- Employees must wash their hands and skin immediately or as soon as possible after each exposure to blood or OPIM.
- If an employee incurs blood or OPIM exposure to their eyes, mouth, nose (any mucus membrane), those areas shall be washed or flushed with water as appropriate immediately or as soon as feasible following the contact.
- Remove gloves and PPE as soon as possible.
- Place PPE in designated area or container for storage, decontamination, or disposal.
- The supervisor must assure that all incidents are recorded and that the investigation into the causes and prevention is made. See the incident report form. A copy of the report must be forwarded to the safety representative and Worker's Compensation Coordinator.

PPE

If occupational exposures remain after instituting engineering and work practice controls, then PPE shall be used. The use of PPE, such as listed below, is mandatory whenever the skin, eyes or mouth is likely to encounter blood or OPIM, and engineering controls cannot be relied upon to completely protect the person from exposure. The following are minimum requirements for the safe use of PPE:

- Where there is anticipated exposure to blood or OPIM, all appropriate PPE such as, but not limited to gloves, gowns, face shields, masks, eye protection with side shields, mouthpieces or other resuscitation devices should be used as applicable.
- All PPE shall:
 - Be readily available in appropriate sizes and personnel shall know its location.
 - Be supplied free of charge to covered personnel.
 - Be periodically inspected and replaced as needed to maintain its effectiveness.

Housekeeping - Any surface that has been exposed to potentially infectious materials shall be decontaminated.

The supervisor(s) shall assure that the work site is maintained in a clean and sanitary condition, all trash containers, pails, bins, and other receptacles intended for routine use are inspected, cleaned, and decontaminated as soon as possible.

Equipment contaminated with blood or OPIM shall be handled as follows:

- Serviceable equipment or instruments that become contaminated with blood or OPIM shall be labeled with a "BIOHAZARD" sign, which shall not be removed until the supervisor(s) or safety representative or their designee has assured that the equipment has been decontaminated.
- Any remaining contamination shall be marked to alert other handlers.

Hepatitis B Vaccination Program

- The supervisor shall provide a list of covered personnel to the Human Resources Department. All covered employees shall be offered Hepatitis B vaccination at no cost.

- Covered employees may decline the vaccination when offered by signing the declination form. At any later time, a covered employee may decide to accept the vaccination and shall receive it at that time.
- All employees who become exposed to blood or OPIM during their association with Milestone shall be offered HBV vaccination or post-exposure evaluation/treatment.
- Additional information regarding the vaccine or the post-exposure evaluation program shall be provided by the designated health care professional.
- If the U.S. Public Health Service recommends a routine dose(s) of HBV at a future date, such as a booster dose(s), they will be made available at no charge.

Post-Exposure / Follow-up Evaluation

If any employee is involved in an incident where exposure to bloodborne pathogens may have occurred, the following steps should be followed:

- First aid steps should be taken.
- Inform the supervisor(s) of any incident immediately.
- Notify the safety administrator as soon as possible.
- Seek medical attention at the designated medical clinics.

All employees who experience an exposure incident will be offered post-exposure evaluation and follow-up in accordance with OSHA standard. If the source individual declines a blood test to determine the presence of the infectious antibodies but does give consent for a blood test, the medical provider shall be instructed to retain the source individual's sample for a (90) day period. The source individual may elect to be tested for infectious pathogen later, in which case the medical provider can use the original sample provided by the individual.

Training

The supervisor shall ensure that training is provided at the time of initial assignment to tasks where occupational exposure may occur. The minimum training course content shall be this program.

Additional training shall be provided by the safety representative or supervisor when there are any changes of tasks or procedures affecting the employee's occupational exposure.

Record Keeping

The safety department shall be responsible for maintaining all documentation and records related to the Bloodborne Pathogens Program. Exposure and medical records shall remain confidential and be maintained for thirty (30) years past the employee's last date of employment.

The following information is needed:

- The name and social security number of the employee.
- A copy of the employee's HBV vaccination status, including dates of vaccination or signed refusal letter.
- A copy of any results of examinations, medical testing, and follow-up procedures.
- A copy of the information provided to the healthcare professional, including a description of the employee's duties as related to the exposure incident, and documentation of the routes of exposure and the circumstances of the exposure.

Training records shall be maintained via HCSS.

Medical Records

The Workers Compensation Coordinator is responsible for maintaining medical records related to occupational exposure.

Personal Protective Equipment

The purpose of this program is to protect all Milestone employees by ensuring that Personal Protective Equipment (PPE) is provided, used, and maintained in a sanitary and reliable condition whenever it is necessary due to hazards from processes or the work environment.

To the extent that it is possible and feasible, the company will remove or eliminate hazards or exposures through engineering means to eliminate the need for PPE.

Minimum Standards

Personal protective equipment (PPE) shall be selected on the basis of the hazards to which the workers are exposed or potentially exposed. Selection of protective equipment shall meet and be used in accordance with guidelines established by ACGIH, ANSI, NIOSH and OSHA.

Assessments

- All Milestone employees shall perform an assessment of the workplace prior to beginning work to determine if hazards are present, or likely to be present, which necessitate the use of personal protective equipment (PPE). **No work shall take place without proper PPE.** If there are changes in the workplace or processes that change the exposures a reassessment shall be completed. Any required PPE may be obtained from the site supervisor or Area Safety Representative.

Training

- Each employee who is required to use PPE shall be trained on proper use, care, and storage. The training will be provided by the Supervisor or Safety Rep of the affected employees.

Care and Storage

- Whenever practical, PPE will be assigned to individual workers for their exclusive use. Employees will be responsible for the PPE equipment assigned to them or used by them.
- PPE shall be regularly cleaned, inspected, and stored according to instructions given during the training sessions or otherwise instructed. Defective or damaged PPE shall not be used. Employees are to report any defective or damaged equipment to their supervisor for repair or replacement.

General Guidelines

Employees should employ the help of their supervisor or safety representative whenever there is doubt about the appropriate type or level of protection required.

- **Proper Clothing** - Class III high visibility clothing will be worn at all times.
- **Eye & Face Protection** - Safety glasses must be worn at all times. Safety glasses must conform to ANSI Z87.1 standard. All protective eyewear shall feature side protection. A face shield is required during welding, sawing, grinding, chipping, or cutting.
- **Head Protection**– Milestone issued hard hats must be worn at all times.
- **Foot Protection**– Milestone requires that safety toe boots be worn at all times. Boots must be at least 6 inches tall and meet ANSI foot protection standards which include both metallic and composite styles. Athletic style footwear is not allowed. Metatarsal guards may be necessary based on the task.
- **Hand/Arm Protection** – Protection level shall be based on task performed, conditions present, duration of use, and the hazards and potential hazards identified. Hand protection must be worn when the possibility for cuts, lacerations, abrasions, punctures chemical or thermal burns and harmful temperature extremes exist.
- **Hearing Protection** - Employees working in areas of high noise or any other area where noise levels exceed 85 dB for an 8-hour TWA must wear hearing protection. Other precautions may be necessary in accordance with Milestone's hearing conservation program.
- **Respiratory Protection** – Appropriate respiratory protection such as dust masks or respirators must be used when respiratory hazards exist and in accordance with other Milestone policies.

Hearing Protection Policy

It is well recognized that employee exposure to noise levels at or above the action level of 85 dBA for an eight-hour time weighted average (TWA) can cause permanent hearing damage. To eliminate employee hearing damage, Milestone Contractor's has implemented this hearing conservation program (HCP). This program is required at all jobsites and facilities where noise evaluations indicate employee TWAs at or above 85 dBA. Reference OSHA Noise Standard (29CFR 1910.95)

- All employees who are exposed to noise at or above the action level will be trained on the hazards presented by excessive noise levels in the workplace, and the use and care of hearing protection devices. Training will be repeated annually for each employee exposed to

noise at or above the action level and updated to reflect changes in personal protective equipment (PPE) and work processes or requirements.

- Hearing protection will be provided by the Project Superintendent or the Area Safety Representative at no cost to all employees exposed to an 8-hour time-weighted average of 85 decibels. Hearing protection will be replaced, as necessary. Each employee will be properly trained in the use, care, and fitting of hearing protection devices. The Project Superintendent and Area Safety Representative will ensure that hearing protection is worn. Employees will be given the opportunity to select their hearing protection from a variety of suitable hearing protection devices. Please see the onsite supervisor to discuss any questions or concerns related to hearing protection.
- Milestone Contractor's will provide a hearing conservation program when employees are exposed to sound levels greater than 85 decibels on an 8-hour time-weighted average basis.
- When Information indicates that employee exposure may equal/exceed the 8-hour time-weighted average of 85 decibels, the Area Safety Representative and Project Superintendent will implement a monitoring program to identify employees to be included in the hearing conservation program.
- Employees will be required to wear hearing protection in work areas whenever employee noise exposure equal or exceed an 8 hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response).
- The Safety Department will maintain an audiometric testing program by making audiometric testing available to all employees whose exposure equal or exceed an 8-hour time-weighted average 85 decibels.
- This program is provided at no cost to employees.

Fall Protection

To enable employees to identify, understand, assess, and safely use fall protection equipment anytime a job requires its use. Every effort must be made to identify job-site hazards and eliminate them by the use of engineering controls before fall protection would be required. Thorough analysis of job tasks will be conducted prior to the start of the project and evaluated more often as needed to determine modifications to these procedures to make the job-site safer.

Reference

29 CFR (Subpart M) 1926.500 OSHA Fall Protection Standard
29 CFR (Subpart D) 1910.21-30 OSHA Walking-Working Surfaces

Responsibility

When fall hazards exist, Supervisors shall ensure that job tasks are analyzed to eliminate the hazards. If fall hazards cannot be eliminated, then the Supervisor shall ensure:

- Job tasks are analyzed to determine the best fall protection system to be used.
- Employees are trained in proper selection, use and care of fall protection equipment.
- Quality fall protection equipment is purchased and made available for employees use. ANSI, ASTM or OSHA standards shall be met for all equipment.
- Equipment must be inspected by the employee prior to each use. Do not use if equipment has any damage or defects and remove from service immediately.
- Where traditional fall protection and 100% tie off is not possible or practical due to conditions, a written fall protection plan must be developed, trained and communicated to outline how to best abate the hazards associated with the task.
- Annual inspection of fall protection systems shall be conducted and documented.
- This procedure applies to all Milestone personnel and contract employees working on Milestone properties, plants or Milestone work sites.

Procedures

- Managers and/or supervisors shall ensure employees and contractors working at any Milestone job site or plant are protected by standard guardrails, catch platforms, temporary flooring, safety nets, fall protection devices or equivalent when a fall may occur and:
 - Employees are working in areas above six (6) feet or more on jobsites and four (4) feet or more at plant/garage facilities.

- Employees are on access ways or work platforms over water, machinery or dangerous operations.
- Employees are on platforms or runways, which are four (4) feet or more above adjacent floor or ground level.
- Employees working in boom or scissor lifts shall practice fall protection per manufacturers specifications. All boom lifts require fall protection.
- Managers and supervisors shall ensure that fall protection equipment and materials are provided to the employees when such fall hazards are identified prior to work commencing and:
 - Employees involved in such activities, know, understand, and use fall protection equipment.
 - Perform daily safety inspections of the jobsite/plants and correct known deficiencies to eliminate equipment or set up hazards.

Fall Protection Systems

- Guardrail systems must meet the following criteria. toprails and midrails of guardrail systems must be at least one-quarter inch (0.6 centimeters) nominal diameter or thickness to prevent cuts and lacerations. If wire rope is used for toprails, it must be flagged at not more 6 feet intervals (1.8 meters) with high-visibility material. Steel and plastic banding cannot be used as toprails or midrails. Manila, plastic, or synthetic rope used for toprails or midrails must be inspected as frequently as necessary to ensure strength and stability.
- The top edge height of toprails, or (equivalent) guardrails must be 42 inches (1.1 meters) plus or minus 3 inches (8 centimeters), above the walking/working level. When workers are using stilts, the top edge height of the top rail, or equivalent member, must be increased an amount equal to the height of the stilts.
- Screens, midrails, mesh, intermediate vertical members, or equivalent intermediate structural members must be installed between the top edge of the guardrail system and the walking/working surface when there are no walls or parapet walls at least 21 inches (53 centimeters) high. When midrails are used, they must be installed at a height midway between the top edge of the guardrail system and the walking/working level. When screens and mesh are used, they must extend from the top rail to the walking/working level and along the entire opening between top rail supports. Intermediate members, such as balusters, when used between posts, shall not be more than 19 inches (48 centimeters) apart.
- Other structural members, such as additional midrails and architectural panels, shall be installed so that there are no openings in the guardrail system more than 19 inches (48 centimeters).
- The guardrail system must be capable of withstanding a force of at least 200 pounds (890 newtons) applied within 2 inches of the top edge in any outward or downward direction. When the 200-pound (890 newtons) test is applied in a downward direction, the top edge of the guardrail must not deflect to a height less than 39 inches (1 meter) above the walking/working level.
- Midrails, screens, mesh, intermediate vertical members, solid panels, and equivalent structural members shall be capable of withstanding a force of at least 150 pounds (667 newtons) applied in any downward or outward direction at any point along the midrail or other member.
- Guardrail systems shall be surfaced to protect workers from punctures or lacerations and to prevent clothing from snagging.
- The ends of top rails and midrails must not overhang terminal posts, except where such overhang does not constitute a projection hazard.
- When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section must be placed across the access opening between guardrail sections when hoisting operations are not taking place.
- At holes, guardrail systems must be set up on all unprotected sides or edges. When holes are used for the passage of materials, the hole shall have not more than two sides with removable guardrail sections. When the hole is not in use, it must be covered or provided with guardrails along all unprotected sides or edges.

- If guardrail systems are used around holes that are used as access points (such as ladder ways), gates must be used or the point of access must be offset to prevent incidental walking into the hole.
- If guardrails are used at unprotected sides or edges of ramps and runways, they must be erected on each unprotected side or edge.

Fall Protection

- Employees traveling or working in elevated areas six feet (6') or four feet (4') at plants, or more above ground level or adjacent surface where a fall exposure exists, shall wear a full body harness and make use of personal fall protection in securing their safety lanyard at all times to a structure, lifeline or approved fall arresting device capable of supporting 5400 pounds.
- All lanyard types should be used per manufacturers specifications, considering fall heights, angle of fall and surrounding materials.
- Fall protection equipment such as safety harnesses, lanyards, self-retracting lanyards, rope grabs, lifelines, etc. must be removed from service and destroyed or repaired if defects or damage is found.
- Fall protection equipment that has been subjected to shock loading imposed during fall arresting shall be removed from service and the supervisor notified immediately.
- Fall protection equipment and systems shall not be used for any other purpose other than employee safeguarding.
- Lanyards shall be the double locking type when used for fall protection and shall not exceed six feet (6') in length, and only used when the fall distance exceeds 19 feet.
- All new safety harnesses and lanyards must be inspected and approved by the Management or competent person prior to initial use.
- When lifelines are used, they shall meet the following requirements:
 - Lifelines must be capable of supporting 5400 pounds.
 - Lifelines may not be used for any purpose other than fall protection.
 - All lifelines must be secured to anchor points and capable of supporting 5400 pounds.
 - Horizontal lifelines shall be of three-eighths inch (3/8") wire rope cable as a minimum and shall be secured on each end by at least two (2) cable clamps or as designed and stamped by a registered professional engineer or per manufacturers specification.
 - Horizontal lifelines should be placed to provide hook up points at least shoulder high for employees using them.
 - Vertical lifelines shall be of five-eighths inch (5/8") synthetic rope.
 - Retractable lifelines and devices must be approved for use in fall protection by Management.
 - Retractable retrieval devices must be secured by means of shackles and /or wire.
 - rope slings or synthetic slings capable of withstanding 5400 pounds.
 - All lifelines must limit free fall distance to six (6) feet or less.
- Safety nets may be used in some situations as fall protection. The installation and use of safety nets shall be under the direction of a Safety Manager and/or a competent person trained in such design techniques.

Training

Management must ensure each employee who might be exposed to a fall hazard is trained by a competent person in at least the following:

- Recognition of fall hazards in work areas.
- Correct procedures for constructing, erecting, maintaining, disassembling, and inspecting fall protection systems.
- The intended load - carrying capabilities of access ways and fall protection systems.
- Proper use of fall protection systems
- Retraining and/or refresher will be conducted annually.
- All training shall be documented, and records retained.

Ladder Requirements

The following requirements apply to the use of all ladders, except as otherwise indicated. **All Ladders Must Be Made Of Nonconductive Material:**

When **portable ladders** are used for access to an upper landing surface, the ladder side rails must extend at least 3 feet (0.9 m) above the upper landing surface to which the ladder is used to gain access:

- When such an extension is not possible because of the ladder's length, the ladder must be secured at its top to a rigid support that must not deflect and a grasping device, such as a grab-rail, must be provided to assist employees in mounting and dismounting.
- In no case must the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support.
- Ladders must be kept free of oil, grease, and other slipping hazards.
- Ladders must not be loaded beyond their manufacturer's rated capacity. The capacity is often found on a sticker affixed to the ladder.
- Ladders must only be used for the purpose for which they were designed. Ladders are not to be used in a horizontal position as walking surface.
- Ladders must have non-conductive side rails if they are used where the employee on the ladder could contact exposed, energized electrical equipment.
- The top step or top of a step ladder must not be used as a step.
- Cross-bracing on the rear section of stepladders must not be used for climbing unless the ladders are designed and provided with steps for climbing on both the front and rear sections.
- When ascending or descending a ladder, the user must face the ladder.
- The worker must use at least one hand to grasp the rung portions when moving up and down the ladder.
- If, while working from a ladder, the employee cannot keep one hand on the rung portion of the ladder, the worker must be tied off.
- An employee must not carry any object or load that could cause the employee to lose balance and fall.
- When at the top of a ladder, if working above 6 feet (1.8m), a fall protection harness must be worn and tied off to a solid structure to protect the employee in the event of a fall.

Ladder stability

Always make sure a ladder is stable before use. For example:

- Non-self-supporting ladders must be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder.
- Ladders must be used only on stable and level surfaces unless secured to prevent incidental displacement. Ladders must not be used on slippery surfaces unless secured or provided with slip-resistant feet.
- Slip-resistant feet must not be used as a substitute for care in placing, lashing, or holding a ladder that is used upon slippery surfaces.
- Ladders placed anywhere they can be displaced by workplace activities or traffic such as in passageways, doorways, or driveways, must be secured, or have another employee stand by at the base of the ladder, to prevent incidental displacement.
- The area around the top and bottom of the ladder must be kept clear.
- Ladders must not be moved, shifted, or extended while occupied.

Ladder Training

Milestone will provide training on the safe use and types of ladders to be used by employees, during New Hire Orientation.

Stairways/Ramps

- Ramps shall be sloped at a 1:12 ratio.
- Any elevation over 19 inches requires a stairway.
- Stairways that will not be a permanent part of the building under construction must have landings at least 30 inches deep and 22 inches wide (76 x 56 cm) at every 12 feet (3.7 m) or less of vertical rise.
- Stairways must be installed at least 30 °- and no more than 50 °- from the horizontal.
- Variations in riser height or stair tread depth must not exceed 1/4 inch in any stairway system, including any foundation structure used as one or more treads of the stairs.

- Doors and gates opening directly onto a stairway must have a platform that extends at least 20 inches (51 cm) beyond the swing of the door or gate.
- Metal pan landings and metal pan treads must be secured in place before filling.
- Stairway parts must be free of dangerous projections such as protruding nails.
- Slippery conditions on stairways must be corrected.
- Workers must not use spiral stairways that will not be a permanent part of the structure.

Temporary stairs

The following requirements apply to stairways used temporarily during construction.

Except during construction of the stairway,

- Do not use stairways with metal pan landings and treads if the treads and/or landings have not been filled in with concrete or other materials unless the pans of the stairs and/or landings are temporarily filled in with wood or other materials. All treads and landings must be replaced when worn below the top edge of the pan.
- Do not use skeleton metal frame structures and steps (where treads and/or landings will be installed later) unless the stairs are fitted with secured temporary treads and landings.

Note: Temporary treads must be made of wood or other solid material and installed the full width and depth of the stair.

Stair rails

- Stairways with four or more risers or rising more than 30 inches (76 cm) in height- whichever is less- must be installed along each unprotected side or edge. When the top edge of a stair rail system also serves as a handrail, the height of the top edge must be no more than 37 inches (94 cm) nor less than 36 inches (91.5 cm) from the upper surface of the stair rail to the surface of the tread.
- Stair rails installed after March 15, 1991, must be not less than 36 inches (91.5 cm) in height.
- Top edges of stair rail systems used as handrails must not be more than 37 inches (94 cm) high nor less than 36 inches (91.5 cm) from the upper surface of the stair rail system to the surface of the tread. (If installed before March 15, 1991, not less than 30 inches [76 cm]).
- Stair rail systems and handrails must be surfaced to prevent injuries such as punctures or lacerations and to keep clothing from snagging.
- Ends of stair rail systems and handrails must be built to prevent dangerous projections, such as rails protruding beyond the end posts of the system.
- In addition:
- Unprotected sides and edges of stairway landings must have standard 42-inch (1.1 m) guardrail systems.
- Intermediate vertical members, such as balusters used as guardrails, must not be more than 19 inches (48 cm) apart.
- Other intermediate structural members, when used, must be installed so that no openings are more than 19 inches (48 cm) wide.
- Screens or mesh, when used, must extend from the top rail to the stairway step and along the opening between top rail supports.

Handrail

- Handrails and top rails of the stair rail systems must be able to withstand, without failure, least 200 pounds (890 n) of weight applied within 2 inches (5 cm) of the top edge in any downward or outward direction, at any point along the top edge.
- Handrails must not be more than 37 inches (94 cm) high nor less than 30 inches (76 cm) from the upper surface of the handrail to the surface of the tread.
- Handrails must provide an adequate handhold for employees to grasp to prevent falls.
- Temporary handrails must have a minimum clearance of 3 inches (8 cm) between the handrail and walls, stair rail systems and other objects.
- Stairways with four or more risers, or that rise more than 30 inches (76 cm) in height- whichever is less- must have at least one handrail.
- Winding or spiral stairways must have a handrail to prevent use of areas where the tread width is less than 6 inches (15 cm).

Mid-rails

Mid-rails, screens, mesh, intermediate vertical members or equivalent intermediate structural members must be provided between the top rail and stairway steps to the stair rail system. When midrails are used, they must be located midway between the top of the stair rail system and the stairway steps.

Handrail training requirements

Employers must train all employees to recognize hazards related to ladders and stairways and instruct them to minimize these hazards. For example, employers must ensure that each employee is trained by a competent person in the following areas, as applicable:

- Nature of fall hazards in the work area; Correct procedures for erecting, maintaining and disassembling the fall protection systems to be used;
- Proper construction, use, placement, and care in handling of all stairways and ladders; and Maximum intended load-carrying capacities of ladders used.

Note: Employers must retrain each employee as necessary to maintain their understanding and knowledge on the safe use and construction of ladders and stairs.

Respiratory Protection

It is the policy of Milestone Contractor's to provide employees with a safe and healthful working environment. This is accomplished by using facilities and equipment that have all feasible safeguards incorporated into their design. When effective engineering controls are not feasible, or when they are being initiated, respiratory protection shall be used to ensure personnel protection.

Safety Department

- The Safety Department is responsible for establishing and maintaining a respiratory protection program. The Safety Department will implement a respiratory protection program which is designed and organized to ensure respirators are properly selected, used, and maintained by Milestone's personnel, and to meet federal regulatory standards (29 CFR 1910.134) and industry accepted standards.
- The Safety Department is also responsible for evaluating those tasks for which respiratory protection is thought to be necessary, determining the degree of hazard posed by the potential exposure, determining whether engineering or administrative controls are feasible, and specifying which respiratory protection device is to be used at each task. In addition, the Safety Department will train personnel in the selection and use of respiratory protective devices, conduct qualitative and quantitative fit testing, and issue necessary protective devices.
- The Safety Department is also charged with establishing medical evaluation and surveillance procedures and reviewing the health status of all personnel who may be required to wear respiratory protective equipment in the completion of their assigned tasks.

Supervisors

- Supervisors will ensure each employee under their supervision using a respirator has received appropriate training in its use and an annual medical evaluation. Supervisors will ensure the availability of appropriate respirators and accessories, provide adequate storage facilities, and encourage proper respirator equipment maintenance. Supervisors must be aware of tasks requiring the use of respiratory protection, and always ensure all employees engaged in such work use the appropriate respirators.

Respirator Wearers

- It is the responsibility of each employee to wear their respirator when and where required and in the manner they were trained. Respirator wearers must report any malfunctions of the respirator to their supervisor immediately. The respirator wearer must also guard against mechanical damage to the respirator, clean the respirator as instructed, and store the respirator in a clean, sanitary location.

Others

- Personnel, such as employees, inspectors, and visitors, who must enter an area where the use of respiratory protective equipment is required, even when their stay time in the area may be 15 minutes or less, shall be provided with and use appropriate equipment, including

instructions regarding use and limitations. Personnel shall be fit tested and medically qualified to wear the respirator being issued prior to entry to the site.

- Subcontractors are required to develop and implement a respiratory protection program for their employees who must enter into or work in areas where exposure to hazardous materials cannot be controlled or avoided. This program must meet OSHA regulations and include issuance of respirators, medical evaluations, fit testing, and training.

Medical Evaluation

The Safety Department initially and periodically thereafter, decides whether an employee can wear the required respirator without physical or psychological risk. Based on the overall health of the individual and special medical tests (pulmonary function studies, EKG, etc.) as appropriate, the examining physician determines whether the individual will be restricted from wearing respiratory protective equipment. If a medical restriction is applied, the employee, their supervisor, and the Safety Department are formally notified of the restriction.

- Specific medical tests and procedures will be determined by the Safety Department and will be in accordance with OSHA medical surveillance requirements and/or NIOSH recommendations.

Selection and Use of Respiratory Protective Devices

Respirator Use - Respiratory protection is authorized and issued for the following personnel:

- Workers in areas known to have contaminant levels requiring the use of respiratory protection or where contaminant levels requiring the use of respiratory protection may be created without warning (e.g., emergency purposes such as hazardous material spill responses).
- Workers performing operations documented to be health hazards and those unavoidably required to be in the immediate vicinity where similar levels of contaminants are generated.
- Workers in suspect areas or performing operations suspected of being health hazards but for which adequate sampling data has not been obtained.

Respirator Use for Biohazards

Respirators for use in areas where biohazards are used or stored must be selected based on a review of the laboratory procedures, protocols, biohazardous agents proposed for use, etc. The Safety Department will conduct a risk assessment and determine the appropriate Biosafety Level for the laboratory and the corresponding level of PPE required.

Respirator Selection

Selection of the proper respirator(s) to be used in any work area or operation at Milestone is made only after a determination has been made as to the real and/or potential exposure of employees to harmful concentrations of contaminants in the workplace atmosphere. This evaluation will be performed prior to the start of any routine or non-routine tasks requiring respirators. Respiratory protective devices will be selected by the Safety Department, using the latest ANSI, OSHA, and NIOSH guidelines. The following items will be considered in the selection of respirators:

- effectiveness of the device against the substance of concern;
- estimated maximum concentration of the substance in the work area;
- general environment (open shop or confined space, etc.);
- known limitations of the respiratory protective device;
- comfort, fit, and worker acceptance; and
- other contaminants in the environment or potential for oxygen deficiency.

Supervisors must contact the Safety Department prior to non-routine work, which may expose workers to hazardous substances or oxygen deficient atmospheres. Examples of work which may require the use of respirators includes, but are not limited to:

- abrasive blasting;
- cutting or melting lead or stripping lead-based paints from surfaces;
- welding or burning;
- painting, especially with epoxy or organic solvent coatings;
- using solvents, thinners, or degreasers;
- any work which generates large amounts of dust;
- working in a confined space; and
- bioaerosols.

A review of the real and/or potential exposures is made at least annually to determine if respiratory protection continues to be required, and if so, whether the previously chosen respirators still provide adequate protection.

Types of Respirators

- Air-Purifying Respirator
 - These respirators remove air contaminants by filtering, absorbing, adsorbing, or chemical reaction with the contaminants as they pass through the respirator canister or cartridge. This respirator is to be used only where adequate oxygen (19.5 to 23.5 percent by volume) is available.
 - Air-purifying respirators can be classified as follows:
 - Particulate removing respirators, which filter out dusts, fibers, fumes and mists. These respirators may be single-use disposable respirators or respirators with replaceable filters. NOTE: Surgical masks do not provide protection against air contaminants. They are never to be used in place of an air-purifying respirator. They are for medical use only.
 - Gas- and vapor-removing respirators, which remove specific individual contaminants or a combination of contaminants by absorption, adsorption, or by chemical reaction. Gas masks and chemical-cartridge respirators are examples of gas- and vapor-removing respirators.
 - Combination particulate/gas- and vapor-removing respirators, which combine the respirator characteristics of both kinds of air-purifying respirators.
- Supplied-Air Respirators
 - These respirators provide breathing air independent of the environment. Such respirators must be used when the contaminant has insufficient odor, taste, or irritating warning properties, or when the contaminant is of such high concentration or toxicity that an air-purifying respirator is inadequate.
 - Supplied- air respirators, also called air-line respirators, are classified as follows:
 - Demand. This respirator supplies air to the user on demand (inhalation) which creates a negative pressure within the facepiece. Leakage into the facepiece may occur if there is a poor seal between the respirator and the user's face.
 - Pressure-Demand. This respirator maintains a continuous positive pressure within the facepiece, thus preventing leakage into the facepiece.
 - Continuous Flow. This respirator maintains a continuous flow of air through the facepiece and prevents leakage into the facepiece.
 - When using supplied air via air compressor, a 10 minute escape air pack is required.
- Self-Contained Breathing Apparatus (SCBA)
 - This type of respirator allows the user complete independence from a fixed source of air and offers the greatest degree of protection but is also the most complex. Training and practice in its use and maintenance is essential. This type of device will be used in emergency situations only and an approved plan must be implemented prior to use.

Identification of Respirator Cartridges and Gas Mask Canisters

- Respirator cartridges and canisters are designed to protect against individual or a combination of potentially hazardous atmospheric contaminants and are specifically labeled and color coded to indicate the type and nature of protection they provide.
- The NIOSH approval label on the respirator will also specify the maximum concentration of contaminant(s) for which the cartridge or canister is approved. For example, a label may read: **WARNING: DO NOT WEAR IN ATMOSPHERES IMMEDIATELY DANGEROUS TO LIFE. MUST BE USED IN AREAS CONTAINING AT LEAST 20 PERCENT OXYGEN. DO NOT WEAR IN ATMOSPHERES CONTAINING MORE THAN ONE-TENTH PERCENT ORGANIC VAPORS BY VOLUME. REFER TO COMPLETE LABEL ON RESPIRATOR OR CARTRIDGE CONTAINER FOR ASSEMBLY, MAINTENANCE, AND USE.**

Signs a respirator is failing

- Particulate Air-Purifying
 - When breathing difficulty is encountered with a filter respirator (due to partial clogging with increased resistance), the filter(s) must be replaced. Disposable filter respirators must be discarded.

- Gas or Vapor Air-Purifying
 - If, when using a gas or vapor respirator (chemical cartridge or canister), any of the warning properties (e.g., odor, taste, eye irritation, or respiratory irritation) occur, promptly leave the area, and check the following:
 - proper face seal,
 - damaged or missing respirator parts, and
 - saturated or inappropriate cartridge or canister.
- If no discrepancies are observed, replace the cartridge or canister. If any of the warning properties appear again, the concentration of the contaminants may have exceeded the cartridge or canister design specification; when this occurs, an airline respirator or SCBA is required.

Service Life of Air-Purifying Respirator Canisters and Cartridges

- The canisters or cartridges of air-purifying respirators are intended to be used until filter resistance precludes further use, or the chemical sorbent is expended as signified by a specific warning property, e.g., odor, taste, etc. New canisters, cartridges, or filters shall always be provided when a respirator is reissued. When in doubt about the previous use of the respirator, obtain a replacement canister or cartridge.

Supplied Air Respirator

- When using an airlines respirator, leave the area immediately when the compressor failure alarm is activated or if an air pressure drop is sensed. When using an SCBA leave the area as soon as the air pressure alarm is activated.

Respirator Training

- Respirator users and their supervisors will receive training on the contents of Milestone's Respiratory Protection Program and their responsibilities under it. They will be trained on the proper selection and use, as well as the limitations of the respirator. Training also covers how to ensure a proper fit before use and how to determine when a respirator is no longer providing the protection intended.
- The Safety Department provides training of respirator wearers in the use, maintenance, capabilities, and limitations of respirators initially upon assignment of personnel to tasks requiring the use of respirators. Retraining is given annually thereafter and only upon successful completion of the medical evaluation.
- The training program will include the following:
 - Nature and degree of respiratory hazard.
 - Respirator selection based on the hazard and respirator capabilities and limitations.
 - Donning procedures and fit tests including hands-on practice.
 - Care of the respirator, e.g., need for cleaning, maintenance, storage, and/or replacement.
 - Use and limitations of respirator.
- Respirator training will be properly documented and will include the type and model of respirator for which the individual has been trained and fit-tested.

Processes and descriptions

- Fit Testing
 - A fit test shall be used to determine the ability of each individual respirator wearer to obtain a satisfactory fit with any air-purifying respirator. Either quantitative or qualitative fit tests will be performed annually. Personnel must successfully pass the fit test before being issued an air-purifying respirator.
 - No employee is permitted to wear a negative-pressure respirator in a work situation until he or she has demonstrated that an acceptable fit can be obtained. Respirator fitting is conducted initially upon assignment to a task requiring use of a respirator. Refitting is conducted annually thereafter upon successful completion of the respirator training.
 - Fit testing will be conducted by the Safety Department and the test results will be the determining factor in selecting the type, model, and size of negative-pressure respirator for use by each individual respirator wearer.
- Fit Checking
 - Each time a respirator is donned, the user will perform positive and negative pressure fit checks. These checks are not a substitute for fit testing. Respirator users must be properly trained in the performance of these checks and understand their limitations.

- **Negative Pressure Check**
 - **Applicability/Limitations:** This test cannot be carried out on all respirators; however, it can be used on facepieces of air purifying respirators equipped with tight-fitting respirator inlet covers and on atmosphere supplying respirators equipped with breathing tubes which can be squeezed or blocked at the inlet to prevent the passage of air.
 - **Procedure:** Close off the inlet opening of the respirator's canister(s), cartridge(s), or filter(s) with the palm of the hand or squeeze the breathing air tube or block its inlet so that it will not allow the passage of air. Inhale gently and hold for at least 10 seconds. If the facepiece collapses slightly and no inward leakage of air into the facepiece is detected, it can be reasonably assumed that the respirator has been properly positioned and the exhalation valve and facepiece are not leaking.
- **Positive Pressure Check**
 - **Applicability/Limitations:** This test cannot be carried out on all respirators; however, respirators equipped with exhalation valves can be tested.
 - **Procedure:** Close off the exhalation valve or the breathing tube with the palm of the hand. Exhale gently. If the respirator has been properly positioned, a slight positive pressure will build up inside the facepiece without detection of any outward air leak between the sealing surface of the facepiece and the face.

Qualitative Fit Testing

Federal regulations (29 CFR 1910.134) require qualitative fit tests of respirators and describe step-by-step procedures. This test checks the subject's response to a chemical introduced outside the respirator facepiece. This response is either voluntary or involuntary depending on the chemical used. Several methods may be used. The two most common are the irritant smoke test, and the odorous vapor test.

- **Irritant Smoke**
 - The irritant smoke test is an involuntary response test. Air purifying respirators must be equipped with a high efficiency particulate air (HEPA) filter for this test. An irritant smoke, usually either stannic chloride or titanium tetrachloride, is directed from a smoke tube toward the respirator. If the test subject does not respond to the irritant smoke, a satisfactory fit is assumed to be achieved. Any response to the smoke indicates an unsatisfactory fit.
 - The irritant smoke is an irritant to the eyes, skin, and mucous membranes. It should not be introduced directly onto the skin. The test subject must keep their eyes closed during the testing if a full facepiece mask is not used.
- **Odorous Vapor**
 - The odorous vapor test is a voluntary response test. It relies on the subject's ability to detect an odorous chemical while wearing the respirator. Air purifying respirators must be equipped with an organic cartridge or canister for this test. Isoamyl acetate (banana oil) is the usual test.
 - An isoamyl acetate-saturated gauze pad is placed near the facepiece-to-face seal of the respirator of the test subject's skin. If the test subject is unable to smell the chemical, then a satisfactory fit is assumed to be achieved. If the subject smells the chemical, the fit is unsatisfactory.
 - If the subject cannot smell the chemical, the respirator will be momentarily pulled away from the subject's face. If the subject is then able to smell the chemical, a satisfactory fit is assumed. If the subject cannot smell the chemical with the respirator pulled away from the face, this test is inappropriate for this subject, and a different test will be used.
 - This test is limited by the wide variation of odor thresholds among individuals and the possibility of olfactory fatigue. Since it is a voluntary response test it depends upon an honest response.

Quantitative Fit Testing

- Quantitative fit testing will be established by the Safety Department through a third party as necessary.
- Quantitative fit testing is generally performed on both full-face and half-face negative pressure respirators. Fit factors are determined by comparing the particle concentration outside the respirator with the concentration inside the respirator facepiece.

- An acceptable fit is achieved when the respirator wearer successfully completes a series of six programmed exercises (normal breathing, deep breathing, moving head up and down, moving head side to side, reading, and normal breathing) with a fit factor of 100 or more.

Extenuating circumstances related to fit and testing procedures.

A positive air purifying respirator would be used for the following circumstances should the employee decline to be clean shaven and other options are not available and where atmospheric testing allows.

- **Facial Hair** - No attempt is made to fit a respirator on an employee who has facial hair which comes between the sealing periphery of the facepiece and the face, or if facial hair interferes with normal functioning of the exhalation valve of the respirator.
- **Glasses and Eye/Face Protective Devices** - Proper fitting of a respiratory protective device facepiece for individuals wearing corrective eyeglasses or goggles, may not be established if temple bars or straps extend through the sealing edge of the facepiece. If eyeglasses, goggles, face shield or welding helmet must be worn with a respirator, they must be worn so as not to adversely affect the seal of the facepiece. If a full-facepiece respirator is used, special prescription glasses inserts are available if needed.

Recordkeeping

Respirator fit testing shall be documented and shall include the type of respirator, brand name and model, method of test and test results, test date, and the name of the instructor/tester.

Maintenance and Issuance of Respirators

The maintenance of respiratory protective devices involves a thorough visual inspection for cleanliness and defects (i.e., cracking rubber, deterioration of straps, defective exhalation and inhalation valves, broken or cracked lenses, etc.). Worn or deteriorated parts will be replaced prior to reissue. No respirator with a known defect is reissued for use. No attempt is made to replace components, make adjustments or make repairs on any respirator beyond those recommended by the manufacturer. Under no circumstances will parts be substituted as such substitutions will invalidate the approval of the respirator. Any repair to reducing or admission valves, regulators, or alarms will be conducted by either the manufacturer or a qualified trained technician.

Cleaning of Respirators

- All respirators in routine use shall be cleaned and sanitized after each use. Respirators used non-routinely shall be cleaned and sanitized after each use and filters and cartridges replaced.
- Routinely used respirators are maintained individually by the respirator wearer. Replacement cartridges and filters are obtained by contacting the Safety Department.
- Cleaning and disinfection of respirators must be done frequently to ensure that skin-penetrating and dermatitis-causing contaminants are removed from the respirator surface. Respirators maintained for emergency use or those used by more than one person must be cleaned after each use by the user.
- The following procedure is recommended for cleaning and disinfecting respirators:
 - Remove and discard all used filters, cartridges, or canisters.
 - Wash facepiece and breathing tube in a cleaner-disinfectant solution. A hand brush may be used to remove dirt. Solvents which can affect rubber and other parts shall not be used.
 - Rinse completely in clean, warm water.
 - Air dry in a clean area in such a way as to prevent distortion.
 - Clean other respirator parts as recommended by the manufacturer.
 - Inspect valves, headstraps, and other parts to ensure proper working condition.
 - Reassemble respirator and replace any defective parts.
 - Place in a clean, dry plastic bag or other suitable container for storage after each cleaning and disinfection.

Issuance of Respirators

- Respiratory protective equipment shall not be ordered, purchased, or issued to personnel unless the respirator wearer has received respirator training and a fit test. New employees who require respiratory protective equipment, must be placed into the respirator program before being issued equipment.

- The Safety Department provides various types of devices. These facepieces have a variety of canisters that may be worn with them; hence, the canisters and facepieces are packaged separately. At the time of issue, the appropriate canister is determined, based on the user's needs, and is issued with the appropriate facepiece. In addition, disposable respirators with filter ratings N-95 and N-100 ratings are available for use under appropriate conditions.

Storage

After inspection, cleaning, and any necessary minor repairs, store respirators to protect against sunlight, heat, extreme cold, excessive moisture, damaging chemicals, or other contaminants.

- Respirators placed at stations and work areas for emergency use shall be stored in compartments built for that purpose, shall always be quickly accessible and will be clearly marked. Routinely used respirators, such as half-mask or full-face air-purifying respirators, shall be placed in sealable plastic bags. Respirators may be stored in such places as lockers or toolboxes only if they are first placed in carrying cases or cartons. Respirators shall be packed or stored so that the facepiece and exhalation valves will rest in a normal position and not be crushed. Emergency use respirators shall be stored in a sturdy compartment that is quickly accessible and clearly marked.

Program Surveillance

An appraisal of the effectiveness of the respirator program shall be carried out at least annually. Action shall be taken to correct defects found in the program.

- The evaluation of the Respirator Program will include investigating wearer acceptance of respirators, inspecting respirator program operation, and appraising protection provided by the respirator.
- Evidence of excessive exposure of respirator wearers to respiratory hazards will be followed up by investigation to determine why inadequate respiratory protection was provided. The findings of the respirator program evaluation will be documented, and this documentation will list plans to correct faults in the program and set target dates for the implementation of the plans. These evaluations will be conducted at least annually.

Recordkeeping

The following records shall be developed and maintained for Milestone's Respirator Program:

- Medical Evaluations
- Training Records
- Respirator Program Manual, IHP, and SOPs
- Hazard Evaluations (air sampling results, surveys, respirator selection records)
- Biohazard Risk Assessments
- Fit Test Records
- Program Evaluations

Silica Exposure Control

The intent of this policy is to establish a plan in which to implement Silica control and abatement on all Milestone Contractor's projects and plants to protect employees from the hazards of silica. The word "dust" in this document is referring to dust which contains crystalline silica. This plan will be evaluated annually and updated as necessary.

Instructions

It is the responsibility of Milestone supervisors to establish silica dust control measures, per tasks as outlined by OSHA. See Modified Table One. Activities which create dust include but are not limited to:

- Earth Work
- Stone Placement
- Sweeping/Brooming
- Saw Cutting: Asphalt, Concrete, Or Utility Pipe
- Concrete Sawing Slurry Byproduct
- Blasting and Cleaning Decks
- Jackhammering

- Concrete Or Asphalt Drilling
- Concrete Or Asphalt Milling
- Concrete Or Asphalt Crushing
- Asphalt Plant Maintenance And Operation

Milestone Modified Table 1 shall be used to determine the best protection for items generating Crystalline Silica Respirable dust at the following levels or above.

Permissible Exposure Limit (PEL): 50 µg/m³ - Action Level (AL): 25 µg/m³

Foremen, Superintendents, Project Managers or General Superintendents are expected to take immediate action and apply any or all techniques as needed to minimize dust including, but not limited to, the following:

- Sweeper/Broom trucks with water disbursement abilities shall be used to extract dust from the area while spraying remaining dust with water and surfactant to decrease its ability to migrate.
- Powered industrial brooms used on surfaces which contain fractured concrete, asphalt or aggregate should have an enclosed cab.
- Powered industrial brooms should always be operated with water at all times, with a surfactant such as dish washing detergent. Surfactants will make the dust/silica heavier and less airborne.
- Broom tanks should be maintained and free of debris which may clog the nozzles, such as algae. This can be achieved by using chlorine or bleach.
- All brooms should be in proper working order.
- Vacuum trucks shall be used to remove debris to eliminate it from the area, in cases of extreme dust in flat, paved areas.
- Water trucks shall be used to dampen, clean, and prevent the dust from becoming airborne.
- Water shall be available at all times for wet sawing methods.
- Silica dust containment apparatus or shelters as applicable. To include vacuum systems with hepa filters.
- Air displacement systems such as fans, leaf blowers or compressed air below 30psi to blow hammering, chipping, or blasting dust away from workers and down to the ground to eliminate migrating silica dust **will require a written site-specific exposure prevention plan.**

It is the responsibility of Milestone Executive Management to ensure that all field personnel have appropriate resources available to complete the above directive.

Crystalline Silica Exposure Prevention

- Primary operations of Milestone Contractors are covered under Table 1, of CFR1926.1153, which outline Crystalline Silica exposure methods and preventions. Table 1 should be reviewed, and all applicable practices employed to protect employees from exposure and documented on the Daily Huddle and or the Project Safety Plan.

Competent Person

- A competent person must be identified when performing any task listed in Table 1.
- A competent person must be designated for construction worksites and has the knowledge and responsibility to implement the written exposure control plan. A competent person as defined by OSHA, is:
"An individual who is capable of identifying existing and foreseeable respirable crystalline silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them."

When Milestone Table 1 is not applicable a Written Exposure Control Plan for Crystalline Silica must be put in place. See below for Methods of Compliance:

- When it is not feasible to reduce exposures to or below the PEL, silica exposure must be reduced to the lowest achievable levels and supplement such engineering and work practice controls with respiratory protection.

NOTE: Respirator cartridges and N95/N95 Masks shall be disposed of at the end of each shift.

Exposure Assessment

- Any combination of exposure monitoring data or objective data may be used to accurately characterize exposures to crystalline silica. A reassessment of exposures is required

whenever there has been a change in the production process, control equipment, personnel, or work practices that may reasonably be expected to result in new or additional exposures to respirable crystalline silica at or above the Action Level.

Written Exposure Control Plan is required and must contain at least the following elements:

- Description of the tasks that involve exposure to respirable silica.
- Description of the engineering controls, work practices, and respiratory protection used to limit employee exposure to respirable crystalline silica for each task.
- Description of the housekeeping measures used to limit employee exposure to respirable crystalline silica.
- For construction worksites, a description of procedures used to restrict access to work areas when necessary, must also be included to minimize the number of employees exposed to respirable crystalline silica and their level of exposure, including exposures generated by other employers.
- Identify the competent person and their role.
- The written exposure control plan must be readily available for examination and copying, upon request, to each employee and OSHA.
- The written exposure control plan must be evaluated at least annually and update as necessary.

Regulated Areas

- Regulated areas must be demarcated when reasonably expected to be in excess of the PEL. DANGER signs must be posted at all entrances to regulated areas to restrict access.
- For tasks not specified in Milestone's Modified Table 1, the exposures are required to be assessed and feasible engineering controls must be implemented to reduce exposures below the PEL.

Housekeeping

- Dry sweeping or dry brushing of concrete or asphalt slurry/dust from cutting is not allowed unless water is used to minimize the likelihood of exposure or other methods which direct dust and particles away from workers.
- Compressed air shall not be used to clean clothing or surfaces where such activity could contribute to exposure to respirable crystalline silica unless effective local exhaust ventilation is used or there is no feasible alternative method.

Medical Surveillance & Examinations

- Medical surveillance exams shall be made available to employees who will be occupationally exposed to respirable crystalline silica at or above the Action Level for 30 or more days per year.
- When medical exams are required, the initial exam must be made available within 30 days after initial assignment. Periodic medical examinations are required at least annually, or more frequently if recommended by the physician or other licensed healthcare professional (PLHCP).

Hazard Communication

- Employees must have access to labels on containers of crystalline silica and safety data sheets and receive training in at least the following silica hazards: cancer, lung effects, immune system effects, and kidney effects. SEE – Asphalt, Concrete and Aggregate SDS for further information.

Recordkeeping

The following documents must be maintained:

- Exposure monitoring data
- Objective data
- Medical surveillance records

Asphalt Plant Maintenance and Operation Exposures

Employees may be exposed to silica during various plant maintenance projects. But most likely during baghouse operations, asphalt/aggregate crushing, and plant loader operation.

- All equipment must be in proper working order and doors and windows should be closed. If loader air-conditioning is not working, the loader must be parked or operated with the windows closed. If windows are broken, the equipment should not be operated.

- Baghouse entry requires a APF 10 respirator at a minimum for the first hour of work and a full face APF 50 or a PAPR APF 1000 for any work after the first hour. (Note: This is due to the potential amount of respirable fines in the area.)
- Crushing of asphalt or aggregate requires that the crushing plant use water as outlined in Table 1 during dry weather operations.
- Other maintenance that produces dust must be evaluated for dust hazards and appropriate protection taken.

Respiratory Protection

Respiratory protection will be administered via the requirements laid out in the Milestone Safety Handbook and records will be kept by the Safety Department and or Human Resources Department as outlined in CFR 1910.134.

- Respiratory Protection will be used as outlined in the modified Table 1 using an APF system.
- All individuals wearing respirators, unless in an emergency situation, must be fit tested and have a medical evaluation.
- Respirator cartridges and N95/N95 Masks should be disposed of at the end of each shift.
- Two Strap Masks and Half Face Cartridge Masks provide an APF of 10.
- Full Face Cartridge Masks provide an APF 50 and will be used for all activities requiring an APF over 10, or as necessary per task assessment.
- PAPR APF 1000 may be used for activities requiring APF over 10 or as necessary per task assessment.

Major Types of Respirators

Air-purifying respirators, which remove contaminants from the air.



Half mask/Dust mask
APF=10
Needs to be fit tested



Half mask (Elastomeric)
APF=10
Needs to be fit tested



Full facepiece (Elastomeric)
APF=50
Needs to be fit tested



Full Facepiece Abrasive Blasting Continuous Flow
APF=1,000
Needs to be fit tested

Milestone Silica Dust Suppression/Employee Protection Methods

Modified Table 1

NOTES:

All persons wearing respirators must be fit tested and have medical evaluations.

Limited Access Zones must be established and people/public must be up wind of operations creating dust.

Dust being displaced or dispersed will require a written site specific silica exposure plan.

Equipment/Task	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum Assigned Protection Factor (APF)		What This Means For Us * Indicates air monitoring needed in this instance.
		≤ 4 hours/shift	> 4 hours/shift	Application Notes
(i) Stationary masonry saws	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None	1. Water must be used at all times during sawing. 2. Slurry created during sawing must be removed manually or via equipment while wet to prevent silica exposure from dried slurry. Slurry must be placed in a containment area that limits the dust being dispersed. *3. If water is not feasible: THIS IS NOT A PREFERRED METHOD A limited access zone of 20' must be established and operators must wear appropriate N95 or P100 Particulate Respirator .
(ii) Handheld power saws (any blade diameter)	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • When used outdoors. • When used indoors or in an enclosed area.	Outdoor None / Indoor APF 10	APF 10	1. Water must be used at all times during sawing. 2. Slurry created during sawing must be removed manually or via equipment while wet to prevent silica exposure from dried slurry. Slurry must be placed in a containment area that limits disbursement. *3. If water is not feasible: THIS IS NOT A PREFERRED METHOD A limited access zone of 20' must be established and operators must wear appropriate N95 or P100 Particulate Respirator .
(iii) Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less)	For tasks performed outdoors only: Use saw equipped with commercially available dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.	None	None	N/A
(iv) Walk-behind saws	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • When used outdoors. • When used indoors or in an enclosed area.	Outdoor None / Indoor APF 10	Outdoor None / Indoor APF 10	1. Water must be used at all times during sawing. 2. Slurry created during sawing must be removed manually or via equipment while wet to prevent silica exposure from dried slurry. Slurry must be placed in a containment area that limits disbursement.
(v) Drivable saws	For tasks performed outdoors only: Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None	1. Water must be used at all times during sawing. 2. Slurry created during sawing must be removed manually or via equipment while wet to prevent silica exposure from dried slurry. Slurry must be placed in a containment area that limits
(vi) Rig-mounted core saws or drills	Use tool equipped with integrated water delivery system that supplies water to cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None	1. Water must be used as specified - Current asphalt coring rigs are outfitted with water. No changes from our usual protocol
(vii) Handheld and stand-mounted drills (including impact and rotary hammer drills)	Use drill equipped with commercially available shroud or cowl with dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.	None	None	1. Drills must be fitted with shroud or cowl and dust collection system. 2. Collected dust must be disposed of in a sealed container (bucket with lid, plastic bag, etc.) 3. Hepa Vac systems must be used to clean holes. *4. When hammer drills are not fitted with a dust collection system: A limited access zone of 20' must be established and operators must wear appropriate N95 or P100 Particulate Respirator .

(vii) Dowel drilling rigs for concrete	For tasks performed outdoors only: Use shroud around drill bit with a dust collection system. Dust collector must have a filter with 99% or greater efficiency and a filter-cleaning mechanism.	APF 10	APF 10	<ol style="list-style-type: none"> Drills must be fitted with shroud and a dust collection system. Collected dust must be disposed of in a sealed container (bucket with lid, plastic bag, etc.) Hepa Vac systems must be used to clean holes. Operators must wear appropriate N95 or P100 Particulate Respirator.
	Use a HEPA-filtered vacuum when cleaning holes.			
(ix) Vehicle-mounted drilling rigs for rock and concrete	Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector.	None	None	<ol style="list-style-type: none"> Drills must be fitted with shroud and a dust collection system, with water. Collected dust must be disposed of in a sealed container (bucket with lid, plastic bag, etc.) Hepa Vac systems must be used to clean holes.
	OR Operate from within an enclosed cab and use water for dust suppression on drill bit.	None	None	
(x) Jackhammers and handheld powered chipping tools	Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.	Outdoor None / Indoor APF 10	APF 10	<ol style="list-style-type: none"> Water spray may be used, but must be continuous while jackhammering takes place. For example - A hand sprayer may be used. Over 4 hours with water will require a respirator. A manufactured shroud and dust collection system may be used. If used longer than 8 hours a respirator is required. When minimal work is to take place the following may occur, if it is an uninhabited area and the public and employees can be kept safe from silica dust. <p>A limited access zone of 20' must be established. Hepa vacuum systems may be used to reduce dust in the work area when water is not feasible and collections systems are not present. Operators must wear appropriate N95 or P100 Particulate Respirator.</p> <p>If a blower system is used to disperse dust, a written</p>
	When used outdoors.			
	When used indoors or in an enclosed area.			
	OR Use tool equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.			
(xi) Handheld grinder for mortar removal (i.e., tuckpointing)	Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.	Outdoor None / Indoor APF 10	APF 10	<ol style="list-style-type: none"> Respirator is always required. If dust collection system is not available a restricted access zone must be established of 20'.
	When used outdoors.			
	When used indoors or in an enclosed area.			
	Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.			
(xii) Handheld grinder for uses other than mortar removal	For tasks performed outdoors only:	None	None	<ol style="list-style-type: none"> Respirator is always required. If dust collection system is not available a restricted access zone must be established of 20'.
	Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.			
	OR Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.			
	Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.			
	When used outdoors.	None	None	
	When used indoors or in an enclosed area.	None	APF 10	

(xiii) Walk-behind milling machines and floor grinders	<p>Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>OR</p> <p>Use machine equipped with dust collection system recommended by the manufacturer.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.</p> <p>When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.</p>	None	None	<p>1. Water or dust collection system must be used.</p> <p>*2. Where not available operator must wear N95 or P100 respirator and 20' limited access zone must be established for employees in the area.</p>
(xiv) Small drivable milling machines (less than half-lane)	<p>Use a machine equipped with supplemental water sprays designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.</p>	None	None	<p>NOTE from NAPA: Although not defined in the rule, a "surfactant" is generally considered a wetting agent or soap-like material. Simple surfactants can include liquid dishwashing soaps. OSHA does not specify the load rate of any surfactant.</p> <p>1. The machine must be equipped with water spray designed to suppress dust.</p> <p>2. When the machine is not equipped with supplemental water, watering via water truck or sprayer may be used. . .</p> <p>All ground personnel working within 20' of the milling machine must wear appropriate N95 or P100 Particulate Respirator if it does not contain a designed dust suppression system.</p>
(xv) Large drivable milling machines (half-lane and larger)	<p>For cuts of any depth on asphalt only: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions.</p> <p>For cuts of four inches in depth or less on any substrate: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions.</p> <p>OR</p> <p>Use a machine equipped with supplemental water spray designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.</p>	None	None	<p>NOTE from NAPA: Although not defined in the rule, a "surfactant" is generally considered a wetting agent or soap-like material. Simple surfactants can include liquid dishwashing soaps. OSHA does not specify the load rate of any surfactant.</p> <p>1. Water must be used to suppress dust and must contain a surfactant.</p>
(xvi) Crushing machines	<p>Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyors, sieves/sizing or vibrating components, and discharge points).</p> <p>Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station.</p>	None	None	TBD
(xvii) Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramping, rock ripping) or used during demolition activities involving silica-containing materials	<p>Operate equipment from within an enclosed cab.</p> <p>When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.</p>	None	None	<p>1. Cab doors must be kept closed for operators.</p> <p>2. Hammers/Hoe Rams should have shrouds to contain flying debris.</p> <p>3. Restricted access zones of 20' must be established for ground personnel.</p> <p>3. When employees or the public are present water must be applied at the source of impact to eliminate dust.</p>
(xviii) Heavy equipment and utility vehicles for tasks such as grading and excavating/brooming and dumping loaded trucks, but not including: demolishing, abrasing, or fracturing silica-containing materials.	<p>Apply water and/or dust suppressants as necessary to minimize dust emissions.</p> <p>OR</p> <p>When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.</p>	None	None	<p>1. Stone may be ordered from the quarry wet or may be watered onsite.</p>
		None	None	<p>1. Enclosed cab required when stone is dry.</p> <p>2. The ground person must wear appropriate N95 or P100 Particulate Respirator while equipment is moving or maintain a distance of 20' while equipment is in operation.</p>

Equipment Awareness

The purpose of this policy is to promote awareness to **ALL** employees regarding moving equipment and other vehicles on the jobsites.

On Non-Milestone controlled sites, this policy should be communicated to the overall project controller/owner and other subcontractors. We should respectfully request the controller/owner and subcontractors abide by this policy when working around Milestone's crews.

- Construction equipment has the right of way, unless in an area where subject to public/pedestrian traffic rules.
- The equipment operator may not be able to see or hear you while in motion.
- Only authorized personnel may enter the area of construction activity. This includes: Milestone employees, subs, suppliers, owners and/or their representatives, and any other approved visitors.
- When approaching moving equipment:
 - Maintain a minimum safe distance of 25-50'.
 - Signal to get the operator's attention from a position facing the front of the machine.
 - Wait until the equipment has come to a complete stop before approaching.
- While in the construction activity area:
 - Maintain a minimum of 10-15' away from all moving equipment, vehicles, and other operations.
 - Stay out of the direct line of the moving equipment, vehicles, and other operations.
 - No personnel shall be directly under overhead loads (OSHA 1926.651(e)).
Examples: Any work requiring Lifting/Rigging devices and/or similar equipment.
 - The equipment operator shall monitor the 10-15' range around his machine to ensure that all people maintain a safe distance.
 - Should any person(s) get in the operating area, operator shall warn them by sounding the horn and coming to a complete stop until the area is all clear and normal operations can safely resume.
 - Operators are responsible to inspect equipment prior to operation during their work shift, to ensure that all safety devices installed on the equipment are in proper working order.
 - The operator shall immediately report any inoperable safety devices to their supervisor and park the equipment until proper safety arrangements are made.
 - The supervisor shall observe all equipment for properly working safety devices.
 - Any Milestone employee disabling or tampering with any safety devices or feature on mobile equipment or operating equipment with inoperable devices, will result in immediate discipline as follows:
 - Immediate Dismissal for Intentionally disabling, modifying, or silencing any safety devices.
 - Time Off Without Pay for Destroying or Ignoring any safety instruction that come with or are posted on the equipment.
 - All other infractions will result in one or more of the following disciplines as determined by management; verbal or written reprimand, time off without pay, or dismissal.
- Milestone Supervisors and Managers shall ensure the following activities are adhered to on their jobsites.
 - This policy will be reviewed periodically during Daily Huddles and during Orientation.
 - Equipment without a backup alarm will be taken out of service or provided with a spotter at all times, until the alarm is repaired.
 - Identify all hazards; use spotters when working in or near hazards, including equipment with poor rear visibility.
 - Accessible areas within the swing radius of the rotating superstructure of a crane or similar equipment shall be barricaded in such a manner as to prevent employees from being struck or crushed by the equipment. (OSHA 1926.550)
 - Barrier options include but not limited to: Grade lathes and caution tape or similar.

Fire Prevention

Milestone is committed to minimizing the threat of fire to employees, visitors, and property. Milestone complies with all applicable laws, regulations, codes, and good practices pertaining to fire prevention. Milestone's separate emergency response plan spells out the procedures for responding to fires. Milestone will provide fire extinguishers, as needed based on hazards and OSHA requirements for both construction and general industry standards where applicable.

Fire safety is everyone's responsibility. All employees should know how to prevent and respond to fires. Management sets Milestone's fire prevention and protection policies in conjunction with the Safety Department. The Safety Department is responsible for carrying out those policies.

- The Field Supervisors and or Facility Managers are responsible for the overall fire protection program to include: (1) ensuring that fire control equipment and systems are properly maintained; (2) controlling fuel source hazards; and (3) conducting fire risk surveys and making recommendations.
- Supervisors/Superintendents must notify the Safety Department when changes in operation increase the risk of fire. Supervisors/Superintendents must also ensure that employees receive appropriate fire safety training.
- Employees must: (1) complete all required training before working without supervision; (2) conduct operations safely to limit the risk of fire; (3) report potential fire hazards to their Supervisors/Superintendents; and (4) follow fire emergency procedures.

Employee Training

All employees should receive basic **fire prevention** training, which includes:

- Good housekeeping practices;
- Proper response and notification in the event of a fire;
- Instruction on the use of portable fire extinguishers; and recognition of potential fire hazards. Employees will also be trained about the fire hazards associated with the specific materials and processes to which they are exposed. Employees will receive this training at their initial assignment. To limit the risk of fires, employees must practice the following **good housekeeping** precautions:
 - Minimize the storage of combustible materials;
 - Fire extinguishers must be within 25-75 feet of fuel tanks.
 - Make sure that doors, hallways, stairs, and other means of egress are kept free of obstructions;
 - Dispose combustible waste in covered, airtight metal containers;
 - Use and store flammable materials in well-ventilated areas away from ignition sources;
 - Use only nonflammable cleaning products;
 - Keep incompatible i.e., chemically reactive substances away from each other;
 - Perform "hot work" e.g., working with an open flame or other ignition sources in well-ventilated areas;
 - Keep equipment in good working order e.g., inspecting electrical wiring and appliances regularly and keeping motors and machine tools free of dust and grease;
 - Ensure that heating units are safeguarded;
 - Report and repair all gas leaks immediately;
 - Repair and clean up flammable liquid leaks immediately;
 - Keep work areas free of dust, lint, sawdust, scraps, and similar material;
 - Do not rely on extension cords if wiring improvements are needed and take care not to overload circuits with multiple pieces of equipment; and turn off electrical equipment when not in use.

Fire Extinguishers

- A fire extinguisher rated 20lb ABC shall be provided for every 3,000 sq. feet of building area. Travel distance from any point of the protected area to the nearest fire extinguishers shall not exceed 100 feet.
- A 10lb ABC fire extinguisher shall be used on all equipment transporting hazardous material. Company pick-ups will have at least a 5lb ABC extinguisher attached to the equipment.
- All welding equipment (Gas and Arc) will have a 10lb fire extinguisher available.
- Carbon Tetrachloride and other toxic vaporizing liquid fire extinguishers are prohibited.

Electrical Fire Hazards

Electrical system failures and the misuse of electrical equipment are leading causes of workplace fires. Fires can result from loose ground connections, wiring with frayed insulation, or overloaded fuses, circuits, motors, or outlets. To prevent electrical fires, employees should:

- Make sure that worn wire is replaced;
- Use only appropriately rated fuses;
- Never use extension cords as a substitute for wiring improvements;
- Use only approved extension cords i.e., those with the Underwriters Laboratory (UL) or Factory Mutual (FM) label; and
- Check electrical equipment to ensure that it is either properly grounded or double insulated.
- All electrical wiring and equipment for light, heat or power purposes shall be installed to comply with OSHA and the National Electrical Code.

Portable Heaters

All portable heaters must be approved by the Safety Department. Portable electric heaters should have tip-over protection that automatically shuts off the unit when it is tipped over. There should be adequate clearance between the heater and combustible furnishings or other materials.

Office Fire Hazards

Fire risks are not limited to Milestone's industrial facilities. Fires in offices have become more likely because of the increased use of electrical equipment, such as computers and fax machines. Employees should avoid overloading circuits with office equipment and turn off nonessential electrical equipment at the end of the workday. Storage areas should be kept clear of rubbish and extension cords should not be placed under carpets. Trash and paper set aside for recycling should not be allowed to accumulate.

Flammable and Combustible Materials

Certain types of substances can ignite at relatively low temperatures or pose a risk of catastrophic explosion if ignited. Such substances obviously require special care and handling.

Class A combustibles These include common combustible materials (wood, paper, cloth, rubber, plastics) that can act as fuel and are found in non-specialized areas such as offices. To handle Class A combustibles safely:

- dispose of waste daily;
- keep trash in metal-lined receptacles with tight-fitting covers (metal wastebaskets that are emptied every day do not need to be covered);
- keep work areas clean and free of fuel paths that could allow a fire to spread;
- keep combustibles away from incidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices;
- store paper stock in metal cabinets;
- store rags in metal bins with self-closing lids;
- do not order excessive amounts of combustibles; and
- make frequent inspections to anticipate fires before they start.

Water, multi-purpose dry chemical (ABC), and halon 1211 are approved fire extinguishing agents for Class A combustibles.

Class B Combustibles These include flammable and combustible liquids (oils, greases, tars, oil-based paints, lacquers), flammable gases, and flammable aerosols.

- Do not use water to extinguish Class B fires caused by flammable liquids. Water can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid. The following fire extinguishing agents are approved for Class B combustibles: carbon dioxide, multi-purpose dry chemical (ABC), halon 1301, and halon 1211. To handle Class B combustibles safely:
 - use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets);
 - Class I flammable liquids must not be dispensed into containers unless the nozzle and container are electrically interconnected by contact or by a bonding wire. Either the tank or container must be grounded.
 - store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks;

- do not use a flammable liquid as a cleaning agent inside a building (the only exception is in a closed machine approved for cleaning with flammable liquids);
- do not use, handle, or store Class B combustibles near exits, stairs, or any other areas normally used as exits;
- do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles;
- do not generate heat, allow an open flame, or smoke near Class B combustibles;
- know the location of and how to use the nearest portable fire extinguisher rated for Class B fire.
- Internal combustion engine powered equipment shall be located so that exhausts are well away from combustible materials.

Smoking

Smoking is prohibited in all Milestone buildings. Certain outdoor areas may also be designated as no smoking areas. The areas in which smoking is prohibited outdoors are identified by NO SMOKING signs.

Maintenance

Milestone will ensure that equipment is maintained according to manufacturers' specifications. Milestone will also comply with requirements in NFPA codes for specific equipment. Supervisors and Plant Managers will schedule annual testing of fire extinguishers, per the direction of Area Management. The Safety Department will inspect fire extinguishers during Safety/Quality Audits and Field Supervisors, Garage Supervisors, Dispatchers, Plant and Lab Personnel will be directed to inspect their area fire extinguishers via e-mail on a monthly basis.

The following equipment is subject to the maintenance, inspection, and testing procedures:

- equipment installed to detect fuel leaks, control heating, and control pressurized systems;
- portable fire extinguishers, automatic sprinkler systems, and fixed extinguishing systems;
- detection systems for smoke, heat, or flame;
- fire alarm systems; and
- emergency backup systems and the equipment they support.

Flammable Liquids

Proper Storage and use of flammable liquids can significantly reduce the possibility of incidental fires and injury to employees. To minimize risk to life and property, the requirements of NFPA 30 & 321 and OSHA Standard 1910.106 have been implemented. SDS for flammable liquids are kept in the supervisor's truck at each jobsite.

Responsibilities Of Management

- Provide proper storage for flammable liquids.
- Ensure proper training is provided to employees who work with flammable liquids.
- Ensure containers are properly labeled.

Responsibilities Of Supervisors

- Provide adequate training in the use and storage of flammable liquids.
- Monitor for proper use and storage.
- Keep only the minimum amount required on hand.
- Ensure SDS are current for all flammable liquids.
- Ensure each piece of equipment has the proper type of fire extinguisher (AQ).
- Follow all storage and use requirements.
- Report deficiencies in storage and use to supervisors.
- Immediately report spills to supervisors.

Hazard Control

Engineering Controls

- Properly designed flammable storage areas
- Ventilated Storage areas
- Grounding Straps on Drums and dispensing points

Administrative Controls

- Designated storage areas
- Limiting amount of flammable liquids in use and storage
- Employee Training
- Limited & controlled access to bulk storage areas

- Posted Danger, Warning and Hazard Signs

Definitions

Flammable Liquid - a liquid with a flashpoint below 100°F

- Class IA - flashpoint below 73°F and boiling point below 100°F
- Class IB - flashpoint below 73°F and boiling point above 100°F
- Class IC - flash at or above 73°F and below 100°F

Combustible Liquids - a liquid having a flash point at or above 100°F.

- Class II Combustibles - Flashpoint above 100°F and below 140°F
- Class III Combustibles - Flashpoint at or above 140°F
- Subclass IIIA - flashpoint at or above 140°F and below 200°F
- Subclass IIIB - flashpoint at or above 200°F

Storage & Usage of Flammable Liquids

Flammable and combustible liquids always require careful handling. The proper storage of flammable liquids within a work area is very important in order to protect personnel from fire and other safety and health hazards.

- Storage of Flammable liquids shall be in NFPA approved flammable storage cabinets or in low value structures at least 50 feet from any other structure. Do not store other combustible materials near flammable storage areas or lockers.
- Bulk drums of flammable liquids must be grounded and bonded to containers during dispensing.
- Portable containers of gasoline or diesel are not to exceed 5 gallons.
- Safety cans used for dispensing flammable or combustible liquids shall be kept at a point of use.
- Appropriate fire extinguishers are to be mounted within 75 feet of outside areas containing flammable liquids, and within 10 feet of any inside storage area for such materials.
- Storage rooms for flammable and combustible liquids must have explosion-proof light fixtures.
- Bulk storage of gasoline or diesel are kept in above ground tanks. Tank areas are diked to contain incidental spills. Tanks shall be labeled by OSHA and NFPA guidelines. All tank areas shall be designated no smoking - no hot work - no open flame areas.
- No flames - hotwork or smoking is permitted in flammable or combustible liquid storage areas.
- Flammable liquid transfer areas are to be separated from other operations by distance or by construction having proper fire resistance.
- When not in use flammable liquids shall be kept in covered containers.
- Class I liquids may be used only where there are no open flames or other sources of ignition within the possible path of vapor travel.
- Flammable or combustible liquids shall be drawn from or transferred into vessels, containers, or portable tanks within a building only through a closed piping system, from safety cans, by means of a device drawing through the top, or from a container or portable tanks by gravity through an approved self-closing valve. Transferring by means of air pressure on the container or portable tanks shall be prohibited.
- Maintenance and operating practices shall be in accordance with established procedures which will tend to control leakage and prevent the incidental escape of flammable or combustible liquids. Spills shall be cleaned up promptly.
- Combustible waste material and residues in a building or unit operating area shall be kept to a minimum, stored in covered metal receptacles and disposed of daily.
- Inside storage rooms shall be constructed to meet the required fire-resistive rating for their use. Where an automatic extinguishing system is provided, the system shall be designed and installed in an approved manner. Materials, which react with water and create a fire hazard shall not be stored in the same room with flammable or combustible liquids. Electrical wiring and equipment located in inside storage rooms shall be approved for Class 1, Hazardous Locations. Every inside storage room shall be provided with either a gravity or mechanical exhausting system. In every inside room, a clear aisle, at least three feet wide, shall be maintained. (from Champagne Asphalt handbook)
- Storage of containers (not more than 60 gallons each) shall not exceed 1,100 gallons in any one pile or area. The storage area shall be graded to divert possible spills away from buildings or other exposures or shall be surrounded by a curb or earth dike. Storage areas shall be free from weeds,

debris, and other combustible material not necessary to the storage. (from Champagne Asphalt handbook)

Cabinets

- Not more than 120 gallons of Class I, Class II, and Class IIIA liquids may be stored in a storage cabinet. Of this total, not more than 60 gallons may be Class I and II liquids

Containers

- The capacity of flammable and combustible liquid containers will be in accordance with the following table.

Maximum allowable capacity of containers and portable tanks

Flammable Liquids	Combustible Liquids				
	1A	1B	1C	II	III
Container					
Glass or approved plastic ¹	1 pt ²	1 qt ²	1 gal	1 gal	1 gal
Metal (Other than DOT drums)	1 gal	5 gal	5 gal	5 gal	5 gal
Safety Cans	2 gal	5 gal	5 gal	5 gal	5 gal
Metal drums (DOT specifications)	60 gal	60 gal	60 gal	60 gal	60 gal
Approved portable tanks	660 gal	660 gal	660 gal	660 gal	660 gal

- (1) Nearest metric size is also acceptable for the glass and plastic
- (2) One gallon or nearest metric equivalent size may be used if metal and labeled with their contents.

Refueling and Service

- No open flame or sources of ignition within 50 feet of refueling at service.
- "No Smoking" signs shall be posted at areas where fueling operations are performed.
- Motors of all equipment being fueled shall be shut off during fueling.
- Each service truck shall be equipped with at one ABC fire extinguishers and have available fire extinguishers within 25-75 feet of the operation (welding, cutting, or refueling)

Fire Extinguisher Inspection Guide

- Is the extinguisher clean and well cared for?
- Has the extinguisher been charged and hydrostatically tested?
- Is the required seal intact?
- Is the discharge orifice clear and unobstructed?
- Is there any indication that the cap may be cross-threaded?
- Is the shell corroded damaged or dented in such a way as to suggest possible weakness?
- Are connections between the hose and the shell and nozzle secure.
- Is the location of the extinguisher accessible and clearly marked?
- Is the extinguisher mounted at proper height (60" under 40lb) (42" over 40lb)? Measure to Top of Extinguisher
- Is extinguisher subject to freezing?
- Is hanger fastened solidly?
- Is extinguisher located too close the hazard to which it is to protect?
- Are employees in the area familiar with the operation of the fire extinguishers?

Cutting, Welding, and Open Flame Work

Milestone will ensure the following:

- Cutting and welding are done by authorized personnel in designated cutting and welding areas whenever possible;
- Adequate ventilation is provided;
- Torches, regulators, pressure-reducing valves, and manifolds are UL listed or FM approved;

- Oxygen-fuel gas systems are equipped with listed and/or approved backflow valves and pressure-relief devices;
- Cutters, welders, and helpers wear eye protection and protective clothing as appropriate;
- Cutting or welding is prohibited in sprinklered areas while sprinkler protection is out of service;
- Cutting or welding is prohibited in explosive atmospheres of gases, vapors, or dusts where explosive atmospheres could develop from residues or accumulations in confined spaces;
- Cutting or welding is prohibited on metal walls, ceilings, or roofs built of combustible sandwich-type panel construction or having combustible covering;
- Confined spaces such as tanks are tested to ensure that the atmosphere is not over 10 percent of the lower flammable limit before cutting or welding in or on the tank; and
- When cutting or welding is done on small tanks, piping, or containers that cannot be entered, they are cleaned, purged, and tested before starting the work.

Electric Arc Welding

Equipment and Cables:

- Before starting operations, all electrical connections shall be checked to determine that they are securely made and firmly attached to the work.
- Work leads shall be kept as short as possible.
- Equipment shall be examined frequently to determine that all electrical connections and insulations on holders and cables are in good condition. Loose cable connections may overheat or arc and cause a fire.
- Be careful not to connect the equipment ground lead of single-phase units to the 3rd wire (hot) of a 3-phase power source.
- Line cords with 3-prong plugs shall be connected to a grounded switch box or a grounded mating receptacle, respectively. Three-prong plugs with a broken ground prong shall not be used.
- Safety devices such as circuit breakers and interlocks shall not be shunted out or disconnected. Power sources or line fuses shall be locked out or removed when equipment is being installed, inspected, or serviced.
- Report any missing enclosures or defects in the motor or generator to your supervisor.
- Terminals of the welding generator shall not contact the frame of the welder. This produces an electrical ground.
- Only electrode holders designed to safely handle the maximum rated current required shall be used.
- Electrode holders that are not fully insulated shall be replaced. Holders with protruding screws shall not be used.
- Electrodes shall be removed from the holder when not in use.
- An arc shall not be stricken on a gas cylinder or any pressure vessel as it may seriously weaken the vessel.
- Only welding cables that are completely insulated, flexible, and of proper size for the maximum current requirements of the work shall be used. Cables shall be regularly inspected for cracks, wear, or damage and repair or replace if necessary.
- Lengths of cable shall be connected by fully insulated lock-type connectors having a capacity equal to that of the cable.
- Cable lugs shall be soldered to the cable and shall be securely fastened to cable for full electrical contact.
- The exposed metal parts of lugs shall be completely covered with rubber tape and protected with friction tape. Exposed parts of electrical units shall have insulating covers in place before the power is turned on.
- Proper electrical contact shall exist at all joints when a building structure or pipeline is used temporarily as a ground-return circuit.
- When a structure or pipe is continuously used as a ground for the machine, all joints shall be electrically bonded to establish a good ground.
- Pipe containing gases, flammable liquids, or conduits carrying electrical conductors shall not be used as a ground-return circuit.
- Welders shall make every effort to keep welding cables dry, grease and oil-free, and protected from sparks or hot metal.

- Cables shall be supported from overhead when practical.
- Cables laid on the floor or ground shall be protected so they will not be damaged or cause a tripping hazard.
- Welding cables shall not be located close to other power supply cables or other high-tension leads.
- When discontinuing work, the power supply switch in the equipment shall be opened and the unit disconnected from the source of power.
- Welding rods shall be stored in the container on the welding machine; not thrown on floors or staging.
- Welding shall never take place in damp areas without insulation to protect workers against electrical shock. Dry duckboard or a mat shall be used if necessary.
- Gas or diesel electric generators shall have the exhaust gases vented to the outside to avoid the toxic effects of carbon monoxide and other gaseous byproducts.

Cylinder Safety – Handling, Storing & Using (to include propane)

Transporting, moving, and storing compressed gas cylinders.

- Valve protection caps shall be in place and secured.
- When cylinders are hoisted, they shall be secured on a cradle, sling board, or pallet. They shall not be hoisted or transported by means of magnets or choker slings.
- Cylinders shall be moved by tilting and rolling them on their bottom edges. They shall not be intentionally dropped, struck, or permitted to strike each other violently.
- When cylinders are transported by powered vehicles, they shall be secured in a vertical position.
- Valve protection caps shall not be used for lifting cylinders from one vertical position to another. Bars shall not be used under valves or valve protection caps to pry cylinders loose when frozen. Warm, not boiling, water shall be used to thaw cylinders loose.
- Unless cylinders are firmly secured on a special carrier intended for this purpose, regulators shall be removed, and valve protection caps put in place before cylinders are moved.
- A suitable cylinder truck, chain, or other steadying device shall be used to keep cylinders from being knocked over while in use.
- When work is finished, when cylinders are empty, or when cylinders are moved at any time, the cylinder valve shall be closed.
- Compressed gas cylinders shall be secured in an upright position at all times except, if necessary, for short periods of time while cylinders are actually being hoisted or carried.
- Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one-half hour.
- Inside of buildings, cylinders shall be stored in a well-protected, well-ventilated, dry location, at least 20 feet (6.1 m) from highly combustible materials such as oil or excelsior. Cylinders should be stored in definitely assigned places away from elevators, stairs, or gangways. Assigned storage places shall be located where cylinders will not be knocked over or damaged by passing or falling objects, or subject to tampering by unauthorized persons. Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.
- The in-plant handling, storage, and utilization of all compressed gases in cylinders, portable tanks, rail tank cars, or motor vehicle cargo tanks shall be in accordance with Compressed Gas Association Pamphlet.

Placing cylinders.

- Cylinders shall be kept far enough away from the actual welding or cutting operation so that sparks, hot slag, or flame will not reach them. When this is impractical, fire resistant shields shall be provided.
- Cylinders shall be placed where they cannot become part of an electrical circuit. Electrodes shall not be struck against a cylinder to strike an arc.
- Fuel gas cylinders shall be placed with valve end up whenever they are in use. They shall not be placed in a location where they would be subject to open flame, hot metal, or other sources of artificial heat.
- Cylinders containing oxygen or acetylene, or other fuel gas shall not be taken into confined spaces.

Treatment of cylinders.

- Cylinders, whether full or empty, shall not be used as rollers or supports.
- No person other than the gas supplier shall attempt to mix gases in a cylinder. No one except the owner of the cylinder or person authorized by him, shall refill a cylinder. No one shall use a cylinder's contents for purposes other than those intended by the supplier. All cylinders used shall meet the Department of Transportation requirements published in 49 CFR Part 178, Subpart C, Specification for Cylinders.
- No damaged or defective cylinder shall be used.

Use of fuel gas.

- Before a regulator to a cylinder valve is connected, the valve shall be opened slightly and closed immediately. (This action is generally termed "cracking" and is intended to clear the valve of dust or dirt that might otherwise enter the regulator.) The person cracking the valve shall stand to one side of the outlet, not in front of it. The valve of a fuel gas cylinder shall not be cracked where the gas would reach welding work, sparks, flame, or other possible sources of ignition.
- The cylinder valve shall always be opened slowly to prevent damage to the regulator. For quick closing, valves on fuel gas cylinders shall not be opened more than 1 1/2 turns. When a special wrench is required, it shall be left in position on the stem of the valve while the cylinder is in use so that the fuel gas flow can be shut off quickly in case of an emergency. In the case of manifolded or coupled cylinders, at least one such wrench shall always be available for immediate use. Nothing shall be placed on top of a fuel gas cylinder, when in use, which may damage the safety device or interfere with the quick closing of the valve.
- Fuel gas shall not be used from cylinders through torches or other devices which are equipped with shutoff valves without reducing the pressure through a suitable regulator attached to the cylinder valve or manifold.
- Before a regulator is removed from a cylinder valve, the cylinder valve shall always be closed, and the gas released from the regulator.
- If, when the valve on a fuel gas cylinder is opened, there is found to be a leak around the valve stem, the valve shall be closed, and the gland nut tightened. If this action does not stop the leak, the use of the cylinder shall be discontinued, and it shall be properly tagged and removed from the work area. In the event that fuel gas should leak from the cylinder valve, rather than from the valve stem, and the gas cannot be shut off, the cylinder shall be properly tagged and removed from the work area. If a regulator attached to a cylinder valve will effectively stop a leak through the valve seat, the cylinder need not be removed from the work area.
- If a leak should develop at a fuse plug or other safety device, the cylinder shall be removed from the work area.

Fuel gas and oxygen manifolds.

- Fuel gas and oxygen manifolds shall bear the name of the substance they contain in letters at least 1-inch high which shall be either painted on the manifold or on a sign permanently attached to it.
- Fuel gas and oxygen manifolds shall be placed in safe, well ventilated, and accessible locations. They shall not be located within enclosed spaces.
- Manifold hose connections, including both ends of the supply hose that lead to the manifold, shall be such that the hose cannot be interchanged between fuel gas and oxygen manifolds and supply header connections. Adapters shall not be used to permit the interchange of hose. Hose connections shall be kept free of grease and oil.
- When not in use, manifold and header hose connections shall be capped.
- Nothing shall be placed on top of a manifold, when in use, which will damage the manifold or interfere with the quick closing of the valves.

Hoses used in conjunction with cylinders.

- Fuel gas hose and oxygen hose shall be easily distinguishable from each other. The contrast may be made by different colors or by surface characteristics readily distinguishable by the sense of touch. Oxygen and fuel gas hoses shall not be interchangeable. A single hose having more than one gas passage shall not be used.
- When parallel sections of oxygen and fuel gas hose are taped together, not more than 4 inches out of 12 inches shall be covered by tape.

- All hose in use, carrying acetylene, oxygen, natural or manufactured fuel gas, or any gas or substance which may ignite or enter into combustion, or be in any way harmful to employees, shall be inspected at the beginning of each working shift. Defective hose shall be removed from service.
- Hose which has been subject to flashback, or which shows evidence of severe wear or damage, shall be tested to twice the normal pressure to which it is subject, but in no case less than 300 psi. Defective hose, or hose in doubtful condition, shall not be used.
- Hose couplings shall be of the type that cannot be unlocked or disconnected by means of a straight pull without rotary motion.
- Boxes used for the storage of gas hose shall be ventilated.
- Hoses, cables, and other equipment shall be kept clear of passageways, ladders, and stairs.

Torches used in conjunction with cylinders.

- Clogged torch tip openings shall be cleaned with suitable cleaning wires, drills, or other devices designed for such purpose.
- Torches in use shall be inspected at the beginning of each working shift for leaking shutoff valves, hose couplings, and tip connections. Defective torches shall not be used.
- Torches shall be lighted by friction lighters or other approved devices, and not by matches or from hot work.

Regulators and gauges. Oxygen and fuel gas pressure regulators, including their related gauges, shall be in proper working order while in use.

Oil and grease hazards. Oxygen cylinders and fittings shall be kept away from oil or grease. Cylinders, cylinder caps and valves, couplings, regulators, hose, and apparatus shall be kept free from oil or greasy substances and shall not be handled with oily hands or gloves. Oxygen shall not be directed at oily surfaces, greasy clothes, or within a fuel oil or other storage tank or vessel.

Excavation & Trenching

The purpose of this policy is to comply with the OSHA standard guidelines for the protection of Milestone Contractor's employees working in and around excavations and trenches.

This policy applies to all job site locations that are controlled by Milestone Contractor's where employees may be exposed to excavations and trenches.

Compliance is mandatory to ensure employee protection when working in or around excavations. The policies in this manual on confined space, hazard communication, lockout/tagout, respiratory protection, and any other safety policy or procedures deemed essential for employee protection, are to be used in conjunction with this policy.

Responsibilities

It is the responsibility of each General Superintendent, Project Manager, Project Superintendent, Foreman, or all other supervisors directing the work to implement and maintain the procedures and steps set forth in this policy. Each employee involved with excavation and trenching work is responsible to comply with all applicable safety procedures and requirements of 29 CFR 1926. 650 – 652.

Safe Work Procedures

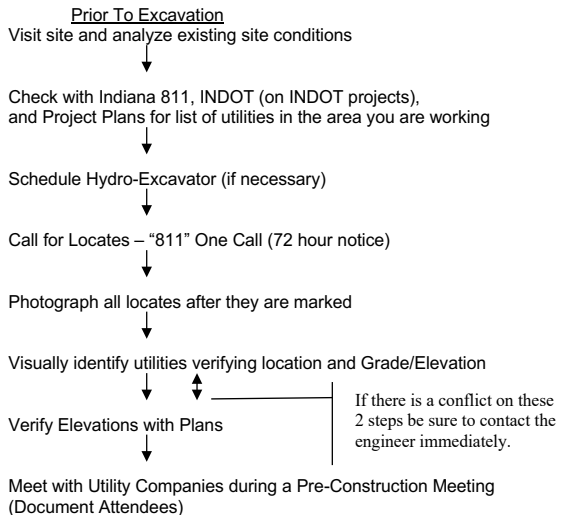
- Before any work is performed and before any employees enter the excavation, a number of items must be checked and ensured:
- Before any excavation, underground installations must be determined. This can be accomplished by contacting the 811 "one-call" center and/or the appropriate owner of the utility or utilities. All underground utility locations must be documented on the proper forms. All overhead hazards (surface encumbrances) that create a hazard to employees must be removed or supported to eliminate the hazard.
- The Superintendent must contact 811 at least 3 full working days prior to starting work.
- The Superintendent must ensure that painting, flagging, or marking of the utilities is completed before starting any ground disturbing activities.
- The Superintendent must renew locate requests every 14 days.

- The Superintendent must review utility locates with crews for awareness prior to work and review as needed as the work progresses.
- Standard utility marks include the following color codes:
 - Red: Electric systems
 - Yellow: Gas & Oil, dangerous materials, product lines, steam lines
 - Orange: Telephone, Telegraph, Police & Fire communication, Fiber Optics, Cable Television CATV
 - Blue: Water system
 - Green: Sewer system
 - White: Proposed excavations
- Use a hydro-excavator or hand-dig to determine the exact location of all buried utilities.
- Narrow down the exact location of the buried utility by potholing the line at approximately 5-foot intervals along the length of the locate marks and/or at the edge of the planned excavation/trench.
- Milestone requires that all excavation activities maintain a minimum 3 feet plus the diameter of the utility distance between mechanical equipment and the utility line. This limit includes every direction from the line. Left, right, over, under, and/or around the buried line.

NOTE: Before any mechanical excavation is performed, the entire length of the utility is to be exposed within the planned excavation area by hand digging or hydro-excavation. Utilities that cross the trench/excavation are also to be fully exposed by hand digging or hydro-excavating to 1 foot beyond the planned edge of excavation to help expose taps, stubs, elevation changes, etc. It is Milestone's responsibility to protect and support the exposed utilities. (See diagrams below.)

- Utility lines buried under a solid surface to be removed (asphalt, concrete, other structures, etc.) should be located on each side of the demolition area. A demolition plan to safely remove the solid surface from over the buried utilities shall be created.
- **WARNING:** Milestone employees shall treat all utility lines as live and fully energized until proven otherwise by the utility owner. Request that the utility verify the line is dead through testing and/or line breaking prior to work commencing/resuming.
- Stop work if an unexpected line is encountered. The Superintendent will then contact 811 to report.

WHEN IN DOUBT STOP WORK AND CALL THE UTILITY



↓
Verify crewmembers are trained in excavation/trench safety and methods for hand locating lines

↓
Double check utility locations in area you will be trenching/excavating

↓
Superintendent/Project Manager shall meet and review locates with every crew prior to starting work on the site

- If the excavation is 20 feet deep or more, it must be designed by a professional engineer who is registered in the state where work will be performed.
- Adequate protective systems must be utilized to protect employees. This can be accomplished through sloping, shoring, or shielding.
- The worksite must be analyzed in order to design adequate protection systems and prevent cave-ins. There must also be an excavation safety plan developed to protect employees.
- Workers must be supplied with and wear any personal protective equipment deemed necessary to assure their protection.
- All spoil piles must be stored a minimum of 2 feet from the sides of the excavation. The spoil pile must not block the safe means of egress.
- If a trench or excavation is 4 feet or deeper, stairways, ramps, or ladders must be used as a safe means of access and egress. For trenches, the employee must not have to travel any more than 25 feet of lateral travel to reach the stairway, ramp, or ladder.
- Trench boxes must extend 18" above the excavation and ladders within the excavation must extend 3' above the edge of the excavation or trench box.
- Trench boxes may be 24" above the bottom of the trench.
- No employee must be allowed to work in an excavation where water is accumulating unless adequate measures are used to protect the employees.
- A competent person must inspect all excavations and trenches daily, prior to employee exposure or entry, and after any rainfall, soil change, or any other time needed during the shift. The competent person must take prompt measures to eliminate any and all hazards.
- Excavations and trenches 4 feet or deeper that have the potential for toxic substances or hazardous atmospheres must be tested at least daily. Documentation of test data will be maintained throughout the course of the project. If the atmosphere is inadequate, protective systems must be utilized.
- All employees working in and around the excavation must be trained in the recognition of hazards associated with trenching and excavating.

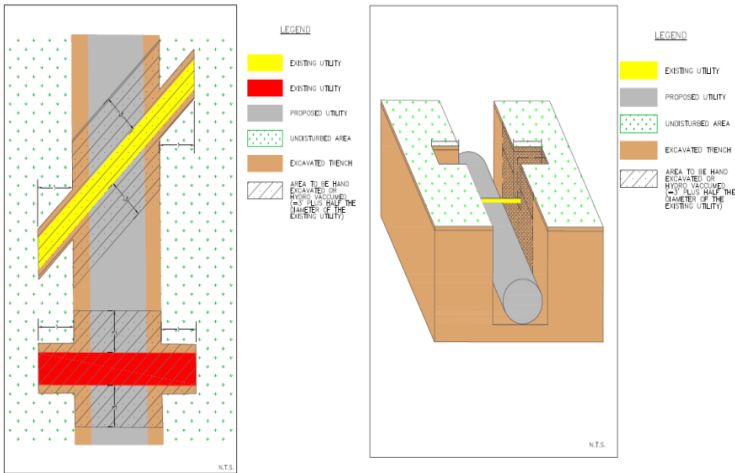
Competent Person Responsibilities

In most work situations, the Site Supervisor will be the competent person for excavation and trenching operations.

The OSHA Standards require that the competent person must be capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous, or dangerous to employees, and have authorization to take prompt corrective measures to eliminate them and, if necessary, to stop the work. A competent person is required to:

- Have a complete understanding of the applicable safety standards and any other data provided.
- Identify the proper locations of underground installations or utilities and ensure that the proper utility companies have been contacted.
- Conduct soil classification tests and reclassify soil after any condition changes.
- Complete Daily Trenching Log for excavations and trenches 4 feet or greater.
- Determine adequate protective systems (sloping, shoring, or shielding systems) for employee protection.
- Conduct and document all air monitoring for potential hazardous atmospheres.
- Conduct and document daily and periodic inspections of excavations and trenches.

- Approve design of structural ramps, if used.



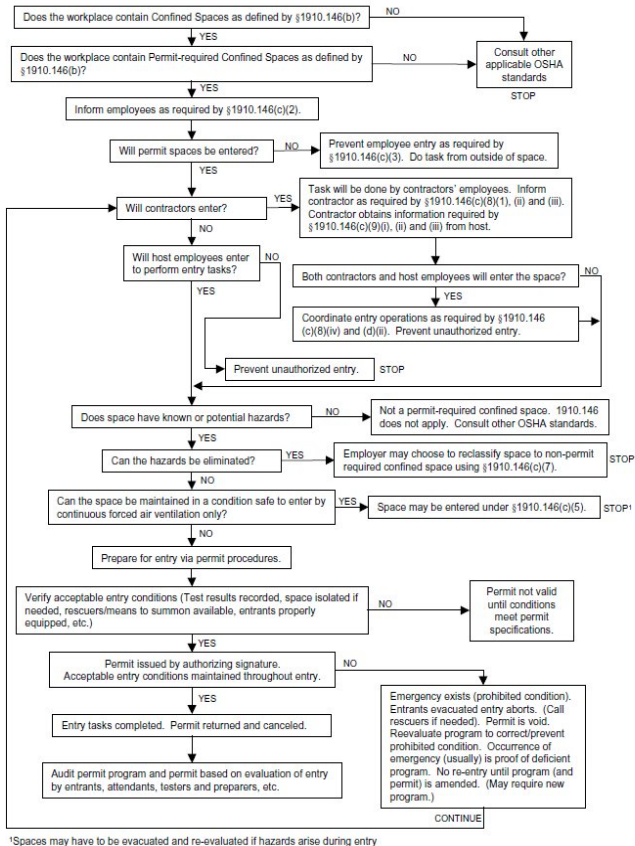
Confined Space Entry Procedures

The purpose of the Confined Space Entry procedures is to provide guidance, documentation, and to reduce the risk of injury that may be presented by confined space structures and their environments. The Confined Space Entry Permit program and requirements apply to all personnel and all subcontractor personnel working at:

- All company properties including offices, shops, jobsites, plants, and facilities.
- Individual customers may also have their own Confined Space Entry Permit requirements of which their requirements shall also be met in addition to those listed herein.
- Confined Spaces are a tank, vessel, silo, hopper (Plants, Shuttle Buggy, Asphalt Paver Hoppers), vault, pit, diked area, coffer dams, caissons, manholes, inlets, or any other enclosed space that has limited access and/or egress, that is not designed for normal occupancy by employees.
- Permit Required Spaces are Confined Spaces which contain one or more of the following:
 - A potentially hazardous atmosphere or other recognized safety or health hazard.
 - The potential for engulfment by particulate matter or liquid.
 - Internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by floor which slopes downward and tapers to a smaller cross section.

Appendix A: 29 CFR 1910.146, Permit-required confined spaces standard

Appendix A, Permit-required Confined Space Decision Flow Chart



- Is listed in 1910.146 Immediately Dangerous to Life or Health (IDLH) - describes a hazardous atmosphere that can cause serious injury or death within a short time or serious delayed effects to exposed employees. IDLH atmospheres include, but are not limited to, oxygen deficient, explosive, toxic, and/or flammable atmospheres.
- Acceptable Atmosphere - shall be tested and monitored to contain all the following:
 - Oxygen levels of 19.5% to 23.5%.
 - Flammable levels are less than 10% of the lower explosive limit (LEL) or lower flammable limit (LFL).

- o Air toxicity and contaminants less than the established permissible exposure limits (PELs) and the short-term exposure limits (STELs).
- Permit required confined spaces require that Safe Work Permits are posted at the site of entry and completed the beginning of each shift or at the change of entrants/attendants.

Procedure

- Prior to any entry of a confined space, a competent person shall evaluate the space to determine if it is permit required. Confined Spaces at Asphalt and Concrete facilities should be labeled appropriately.
- When multiple employers are onsite and may potentially enter a confined space, a documented briefing must be held as outlined below:
- Host Employer (Owners, etc. NOTE: Milestone is Host Employer at its facilities and jobsites)
 - o Advise of permit spaces. Hosts must advise contractors of any permit spaces on the host's premises that the contractor's employees may have reason to enter.
 - o Must compel compliance by informing contractors that permit spaces can only be entered under the requirements of 29 CFR 1910.146(d) or 29 CFR 1926.1204
- Is obligated to inform contractors of their previous experience with the space and of any other known hazards that make the space a permit space.
- Inform contractors of any entry precautions that have been implemented such as draining, flushing, and rinsing a space; isolating the space by disconnecting lines, blanking or providing a double block-and-bleed system; locking out mechanical equipment; flagging or barricading the work area; de-energizing electrical equipment; providing temporary lighting; purging and ventilating the space; and performing initial atmospheric testing.
- Must coordinate operations with the contractor when host and contractor employees will be working in or near permit spaces.
- At the conclusion of the entry, the contractor must debrief the host regarding the permit program and any hazards confronted in the space during entry operations.

Contractor's Duties (Milestone Responsibilities)

In addition to complying with all the other requirements governing confined space entry, contractors must:

- Obtain any available information regarding permit space hazards and entry operations from the host.
- Inform the host of the provisions of the contractor's written permit program if it is agreed that the contractor's program will be followed rather than the host's.
- Coordinate entry operations when the host's and the contractor's employees will be working in or near permit spaces; and
- Report hazards confronted or created during the entry to the host, either at the debriefing session or when they occur.
- Obtaining Safe Work Permit - When it has been determined that a work task involves a confined space and entry into such confined space is to be performed, a Safe Work Permit shall be obtained and completed with the Competent Person's signature.
- Where outside contractors shall be entering the confined space, the safe work permit shall be completed by both contractor supervisor and the Milestone Competent Person to brief the contractor on potential hazards of the space.
- The Safe Work Permit used shall be the permit form approved by the Safety department. The permit will be consistent with the company's safe work policies and procedures and shall record at the beginning of each shift or change or entrants:
 - o Environmental Conditions
 - o Required Precautions
 - o PPE Needed for Entry
 - o Environmental Conditions Tested and Results
 - o Person Authorizing Entry
 - o Names of the Entry Safety Attendants
 - o Names of Employees Performing the Entry
 - o After completion of the entry, the safe work permit will be maintained by the Safety Department for 1 year.

- Identification of Contents - All known contents of the space shall be listed on the safe work permit. Such content list shall include all load, cargoes, and/or product contained in the space since the last cleaning and purging or the last three products, whichever is less.
- Required Equipment for Entry - The following safety equipment is required to be used for all Confined Space entries and will be provided by Milestone Contractor's:
 - Safety harness with lifeline
 - Explosion proof lighting
 - Continuous air monitoring equipment
 - PPE and respiratory protective equipment as required by the project scope and safety plan.
 - (a) Where the confined space atmosphere is determined to be within the acceptable limits, air purifying respirators with appropriate cartridges shall be worn during entry, where appropriate based on the confined space contents.
 - (b) Where a potentially hazardous atmosphere could be introduced into the confined space, all entrants shall use continuous 4 gas air monitoring and a retrieval system. In situations where supplied air may be required a comprehensive entry plan must be developed with the Safety Department prior to work commencing.
 - (c) Where unknown contaminants may exist in the confined space, the contaminant level cannot be determined, a potential IDLH atmosphere exists, and/or an emergency rescue is being performed, self-contained or airline supplied air respirators with escape breathing units must be used.
- Continuous fresh air ventilation. Such ventilation shall be positive pressure where possible.
- Rescue Equipment - The following rescue equipment must be immediately available at the entrance to the confined space and within reach of the safety attendant:
 - Explosion proof flashlights with spare batteries
 - First aid kit with knife
 - Mechanical Retrieval Equipment
 - Alarm
 - Roll of duct tape
 - Toolbox with tools
- Personal Protective Clothing of a type at least equal to or greater than the chemical resistance of that worn by the entrants to be worn by the rescuer with another set available for a second rescuer.
- Positive pressure supplied air breathing equipment in a ready-to-use state that is not part of any supplied air breathing equipment that is being used by the original entrant.
- Blanking/Blinding - Before entry, all pipes and lines (including fill and drain-pipes) that are connected to the confined space shall be disconnected or blanked/blinded, and this action is to be verified on the safe work permit.
- If entry must be made and a disconnection or blanking/blinding is physically impossible, the procedure requires all of the following actions:
 - Isolating the confined space as rigorously as possible.
 - Assessing the risks present and potential.
 - Approval by the Project Superintendent who will assume the risks.
- Lock-out/Tag-out - All electrical and mechanical equipment in permit-required confined spaces must be locked-out and tagged if its inadvertent energizing could create a hazard. All mechanical equipment shall be blocked in addition to the electrical lock-out. The lock-out shall comply with the companies Lock-out Policy and Lock-Out/Tag-Out Procedures.
- Ventilation - Permit-required confined spaces are to be ventilated if they contain a hazardous atmosphere, prior to and during the entry.
- Atmospheric Testing – All Confined Spaces must be monitored and tested for oxygen content, flammable limit, and toxic contaminants before each entry. Permit Required Confined Spaces require continuous air monitoring. If such atmosphere is not acceptable for entry, ventilation shall continue without entry until retesting of the atmosphere shows acceptable limits. Atmospheric testing shall be done at all levels and distances within the confined space as practical. The Competent Person or his designee shall be responsible for such atmospheric testing and continuous monitoring during the entry and for the documentation of such test results before entry.

- Attendants – At all times during a confined space entry, an attendant is required. The attendant must be properly trained, equipped and continuously present at the confined space entrance. At no time shall the attendant participate in other project work while the entry is in progress. The names of the designated attendant shall be listed on the safe work permit.
- All attendants and entry personnel must be trained in confined space entry and safe work permit procedures during their initial training and during refresher training.
- At no time shall the attendant or any unauthorized personnel enter the confined space, even in an emergency situation.
- The attendant must be in continuous contact with entry personnel either visually, by a tagline or by intrinsically safe radio communications. When an emergency is detected by the attendant, help shall be summoned by the attendant via mobile phone or verbal means.
- Supervisors is responsible to monitor upstream weather to provide early warning of flash flooding. This may be done via mobile weather warning system.
- Rescue systems should be comprised of retractable winches or block and tackle systems, and may include tripods, davit arms, etc. Permit required confined space entry will require a rescue system, unless otherwise specified in the facility safety plan. Plant bag houses, hoppers, and other such spaces where the configuration would pose more of a hazard to the entrant if they were attached to a retrieval system will require non-lifeline attachment rescue as they do not pose potential for engulfment, hazardous atmosphere or entrapment.
- Rescue - At the time of an emergency including confined space entrants, the attendant shall make an evaluation of the possible causes of the emergency and take appropriate measures to provide additional or upgraded protective equipment, ventilation, etc. to adequately protect the rescuer(s).
- During any permit required confined space entry, harnesses and lifeline shall be worn and lifelines and mechanical retrieval equipment shall be available. Where lifeline attachment during the entry presents a greater risk or hazard, then the release of the lifeline may be authorized. Where mechanical retrieval equipment is not feasible to be used, an effective alternative must be provided and approved by the Competent Person.

Non-Permit Required Confined Space

All spaces shall be considered permit required confined spaces until the pre-entry procedures determine otherwise.

Non-permit required confined spaces must contain acceptable atmospheric levels as listed below and be free of hazardous condition such as engulfment, entrapment, etc. See pre-entry procedure details.

- Pre-Entry Procedures:
 - Oxygen levels of 19.5-23.5% must be monitored prior to each entry.
 - Flammable levels less than 10% of the lower explosive limit (LEL) or lower flammable limit (LFL).
 - Air toxicity and contaminants less than the established permissible exposure limits (PEL) and the short-term exposure limits (STEL).
 - Air toxicity and contaminants less than the established PEL's and STELs and does not contain any of the following:
 - Engulfment Hazards
 - Entrapment Hazards
 - Other health or safety hazards.
- Once these levels have been achieved and hazards are abated, entry without permit or attendant is permitted by complying the following:
 - Complete a Safe Work permit and check box marked "other" and write in "Non-Permit Required Confined Space".
 - At any time during the shift of work, should any of the atmospheric levels fall out of the acceptable range, stop and re-access to ensure that it is safe to continue. The work being conducted, or other means may have introduced a change to the environment making working conditions unsafe.
 - When working in a non-permit required confined space a team of at least two people that are capable of communicating per attendant's communication duties, such as visual or audible communications or other means is required. (Example: use of a rope as means of communicating.)

- Should one team member leave the area of communication, the other member shall stop work and exit the confined space until the team member returns. Work must not proceed until the second team member returns to the work area.
- Prepare a written Safety Plan and communicate the plan to employees and post for reference.
- In the event of an emergency, enact the Crisis Management Plan immediately.

Electrical Service Safety Specifications

This guideline establishes safety standards for electrical service and maintenance. The safety requirements of this standard are for the protection of employees and apply to equipment and facilities of Milestone Contractors. These standards supplement local, state, and national recognized codes.

- All existing installations shall be brought into compliance. Electrical equipment shall be installed and maintained in conformity with company lockout procedures (See Appendix A) and local, state and nationally accepted electrical codes.

General Rules

- Appropriate PPE must be worn during electrical work.
- Circuits shall be de-energized before any work is attempted and they shall be grounded to prevent back feed. Switches shall be opened and locked out and equipment of circuit proof-tested before work proceeds. (See Lockout Procedure Appendix A) The lock shall be removed only by the person or supervisor who installed it.

Warning Signs

- Identification signs will be posted on control boxes showing what equipment these boxes control.
- Entrances to trailers, rooms and other guarded locations containing high voltage; must be indicated by high voltage signs. Also, signs forbidding unqualified persons to enter.
- The operating voltage of the exposed live parts of the transformer installations, etc. shall be indicated by signs or visible markings on the equipment or structures and the hazards painted orange (OSHA 1910.144).
- When handling fuses use insulated tongs (pullers) shall be provided for use in testing or changing fuses whether the circuit is dead or alive.

Electrical Grounding

- The resistance to earth should be maintained as low as possible. A resistance of 1 ohm or less is desirable.
- All interior wiring systems shall be grounded, and all fixed equipment shall be grounded.
- All portable appliances and portable tools; which are cord and plug-connected shall be grounded, by use of a GFI.
- Fixed equipment having exposed noncurrent-carrying metal parts which are liable to become energized shall be grounded.
- All flooring in front of electrical boxes will be grounded with rubber mats to protect workers from electrical shock.

Fixed Wiring and Installation

- Live parts of electrical equipment operating at 50 volts or more shall be guarded against incidental contact by approved cabinets or other forms of approved enclosures.
- Electrical equipment shall be installed in a neat manner and shall be firmly secured to the surface on which it is mounted. Wooden plugs driven into holes in masonry concrete, plaster or similar materials shall not be depended on for security. Temporary wiring such as extension cords is approved for emergencies only. Extension cords cannot be used for permanent wiring.
- Unless authorized for the purpose, no conductors or equipment shall be located in damp or wet locations where exposed to gases, fumes, vapors, liquids or other agents having a deteriorating effect on the conductors or equipment; or where exposed to excessive temperatures.
- Enough access and working space shall be provided and maintained about all electrical control boxes. This will allow ready and safe operation and maintenance of such equipment. Working space shall not be used for storage.

Electrical Boxes

- (ARC Flash procedures shall be used as outlined herein when opening, testing, or working on live electrical boxes)
- Each outlet box shall be provided with a cover which shall be kept in place when access is not immediately necessary.
- Openings through which conductors enter shall be adequately closed.
- Unused openings in boxes and fittings shall be effectively closed to afford protection substantially equivalent to that of the wall of the box or fitting.
- Boxes shall be securely and rigidly fastened to the surface upon which they are mounted.
- Parts of electrical equipment which in ordinary operation produce arcs, sparks, flames or molten metal shall be enclosed unless separated and isolated from all combustible material and personnel.

Identification

Each disconnect means required by the National Electrical Code for motors and appliance and each service, feeder or branch circuit at the point of origin, shall be legibly marked to indicate its purpose.

- Attachment plugs and connectors shall be so designed that they will not fit into receptacles of other than the correct rating.
- No wiring systems of any type shall be installed in ducts used to transport dusts, loose slack, heat, or flammable vapors.

Cords

- Flexible cord shall not be used (1) as a substitute for the fixed wiring of a structure; (2) where run through holes in walls, ceilings, or floors; (3) where run through doorways, windows, or similar openings; (4) where attached to building surfaces; (5) where concealed behind building walls, ceilings, or floors; or (6) where allowed to run on floors.
- Flexible cord shall be used only in continuous lengths without splice or tap.
- Flexible cords and cables and their associated fittings shall be suitable and approved for the conditions of use and location.
- Worn or frayed electric cords and cables shall not be used.

Hazardous Locations

General

- All wiring, components and utilization equipment shall be approved by the Underwriters Laboratories, Inc. and/or the Factory Mutual Laboratory provided such equipment is commercially available.
- All approved equipment shall be used only within the scope of that approval.
- Equipment approved for a specific hazardous location shall not be installed or intermixed with equipment approved for another specific hazardous location.
- Special attention shall be given to workmanship to ensure that all wiring components and utilization equipment are maintained as vapor, dust, or fiber-tight as contemplated by their approvals. There shall be no loose or missing screws, gaskets, threaded connections, or other impairments to this tight condition.
- Equipment and associated wiring approved as intrinsically safe may be installed in any hazardous location for which it was approved.
- The National Electric Code shall be consulted for specifications and requirements relating to an operation or hazard category.

Technical Questions

- Technical questions concerning these standard and local, state, and national codes should be referred to the Milestone Safety Department.

ARC Flash Protection and Work Procedures

- The following procedures are to be followed when encountering electrical equipment or service to be repaired, in conjunction with the requirements of Standard NFPA 70E.

Step 1

Identify equipment to be serviced or repaired.

- Use ARC Flash Labels voltage
- Discuss with affected personnel what work will be performed.
- If there is to be no exposed electrical equipment or conductors use standard Lock Out / Tag Out procedures and "Safe Work Permit". (Reference MCLP Safety Handbook)

- If there will be personnel exposed too possible electrically energized equipment or conductors look at disconnect for equipment to be worked on.
- Review required PPE on Arc Flash label and the Boundary explanations below.
- Flash Boundary – 4 feet unless otherwise noted on label.
- Limited Approach – A safe approach boundary. Only Qualified employees and escorted unqualified employees may cross.
- Prohibited Approach– Only Qualified employees protected by insulating materials (arc flash gear).
- Restricted Approach– Only Qualified employees may cross. When working within this boundary, must use special precautionary techniques and PPE.

Remove and or keep unqualified personnel from work area.
Using the “Safe Work Permit” check all PPE required for task.

Note: ALL THE ABOVE BOUNDARY INFORMATION IS ON THE ARC FLASH LABEL.

Step 2

Electrically Safe Work Condition must be met before work can start on equipment.

- Even after Lock Out / Tag Out, we must verify the absence of voltage.
- “NOT DEAD UNTIL TESTED DEAD”
- Using the approved class III meter check for voltage on the load side of breaker or motor starter.
- During this phase of reaching an electrically safe work condition that the appropriate Arc Flash PPE is required to be worn.
- After Electrically Safe Work Condition has been met Arc Flash PPE can be removed.
- Complete pre-work check of the “Safe Work Permit”

Step 3

If all the above requirements have been met, perform the repairs or replacements on plant.

Step 4

After repairs are complete is electrical testing of new equipment required. If testing is required identify and locate all tools used for repair that might come in contact with electrical equipment before re-energizing disconnect.

- It is good work practice to Ohm or resistance test the motor leads to equipment ground before energizing equipment to verify that it is safe to turn power back on.
- If further testing is not required go to step 6.
- If these tests need to be performed Arc Flash PPE will have to be put back on before disconnect is unlocked and tag removed. Re-energize disconnect, perform required testing.
- Possible tests to be performed:
- Amperage testing
- Voltage testing

Step 5

Testing Complete

Step 6

Secure any tools used for repairs or replacement. Close covers, doors and remove Lock Out / Tag Out. Turn Disconnect back on.

Step 7

Resume normal operations.

Lockout/Tagout Procedure

This procedure applies to all Milestone employees and contractors working for Milestone Contractor’s and establishes guidelines to prevent injury, illness, or property damage due to exposure to or the inadvertent starting of processes and powered equipment.

Employees must be trained on each lockout/tagout point by a competent person.

Definitions

- **Lockout** - The application of personal locks and danger identification tags, chains, or other appropriate apparatus to de-energize electrical equipment and mechanical equipment to ensure that they cannot be activated.

- **Tagout** - The application of danger identification tags to alert personnel that a particular energy source shall not be operated. Positive isolation is required for confined space energy sources, (i.e., blanks, blinds, etc.)
- **Main Identified Energy Source** - A switch or valve that controls the flow of energy to a unit. Examples include the motor control center, breaker panel switches, and compressed air hoses.
- **Out of Service Equipment** - Equipment that has been shut down for maintenance or alterations and is not currently being worked on.

Types of Energy Sources

Main and Secondary Energy Types

- **Electrical** Locate AC or DC Knife blade Disconnect (preferred), Rotary Disconnect, Breaker Switch, or Plug. Isolates electrical energy supply.
- **Pneumatic** Locate Lockable Valve (preferred), Ball Valve, Gate Valve, Quick Disconnect Fitting. Isolates compressed air supply.
- **Hydraulic Pump** Locate Electrical Disconnect that powers a hydraulic pump. Isolates hydraulic pump motor.
- **Hydraulic Line** Locate Ball Valve. Stops flow/backflow in hydraulic oil circuits.
- **Water** Locate Ball Valve, Gate Valve, Butterfly Valve. Stops flow/backflow in water system.
- **Gas** Locate Ball Valve, Gate Valve, Butterfly Valve. Stops supply of gas.
- **Chemical or Coolant** Locate Ball Valve, Gate Valve, Butterfly Valve. Stops chemical/coolant supply or return.
- **Steam** Locate Ball Valve, Gate Valve, Butterfly Valve. Stops supply/return of steam.

Stored Energy Types

- **Release Gas** Locate Ball Valve, Gate Valve, Butterfly Valve. Releases residual pressure in the line or accumulator. Also identifies Refrigerant Reclaim procedure.
- **Control Gravity** Insert pins, blocks to prevent vertical movement.
- **Control Motion Restrain**, install pins to prevent movement of cylinder operated slides.
- **Dissipate Rotation** Locate flywheels and spinning equipment. Ensure that all movement stops.
- **Release Hydraulic** Locate Ball Valve. Releases residual hydraulic oil pressure in accumulator.
- **Release Water** Locate Ball Valve, Gate Valve, Butterfly Valve. Releases residual water pressure in supply/return lines.
- **Release Pneumatic** Locate Ball Valve, Gate Valve. Releases residual compressed air pressure.
- **Release Chemical or Coolant** Locate Ball Valve, Gate Valve, Butterfly Valve. Releases residual chemical/coolant pressure in supply/return lines.
- **Release Electrical** Locate Knife Blade Disconnect where electrical energy is stored. Allow capacitors to discharge for 2 to 5 minutes.
- **Release Steam** Locate Ball Valve, Gate Valve, Butterfly Valve. Releases residual steam pressure in supply/return lines.
- **Dissipate Thermal** Use caution if heat above 105 °F, Cold below 28 °F. Allow to cool down or warm up before proceeding.

Procedure

- Prior to initiating the following operations, deactivation is required:
 - Installation
 - Maintenance
 - Adjustment
 - Inspection
 - Cleaning
- The Competent Person ensures the appropriate equipment or process is deactivated at all main identified energy sources (valves must be closed, breakers open, etc.).
- The Competent Person will shut down and lock and tag out, with a personal lock, all main identified energy sources. Any other personnel including contractors working on the equipment will also apply their personal lock and tag at the appropriate lock out point.
- Once the equipment is isolated the Competent Person will be contacted. The supervisor will verify the lock out by attempting to start and/or operate the equipment. If the equipment will not operate then the permit is to be granted.

Energy Control Procedures

- Some Asphalt and Concrete Plant Facilities follow the BradyLink360 system that provide visual and electronic LOTO steps that must be followed. Affected contractors and employees on plant sites will be trained by the Competent Person.

Periodic Inspections

- An annual inspection of each energy control procedure will be performed by a competent person, who is not involved in the energy control procedure that is being inspected.
- The periodic inspection will entail:
 - Identify any deficiencies or deviations and correct them.
 - Where lockout is used, the inspector must review each authorized employee's responsibilities under the procedure with that employee (group meetings are acceptable)
 - Where tagout is used, the inspector must review both the authorized and affected employee's responsibilities with those employees for the energy control procedure being inspected, and the additional training responsibilities.
 - The employer must certify that the periodic inspections have been performed.
- The annual inspection certification will identify:
 - The machine on which the procedure was utilized.
 - The date of inspection.
 - The employees included in inspection.
 - The person who performed the inspection.

Lock Removal

- Inspection - when the work is completed, or during testing, an inspection shall be made before any locks or tags may be removed. This inspection shall ensure that the job is completed.
- All personnel are clear.
- Guards are in place.
- Blocks are removed.
- Lines are closed or open as appropriate.
- If the shift ends and the work is not complete, the employees performing the operation shall remove their personal locks. However, department locks are to be left in place. If a department lock is not in place, the authorizing supervisor is to be contacted about placing a department lock on the equipment prior to removal of personal locks.

Removal of Forgotten Locks or Tags

- When a lock or tag is left or believed to be left on a piece of equipment, the following procedure is to be followed:
 - The competent person is to be contacted.
 - Along with the reporting person, the Competent Person will determine whose lock is on the equipment and if they are still on-site.
 - If the lock's owner is not available, the Competent Person will review the work that was to be done and see if it is complete.
 - After determining the work is complete, the situation should be reviewed with operations and an attempt made to contact the owner of the lock. Based on this review it shall be determined if removal is required.
 - If removal is required, then the Competent Person shall remove the lock and with operations return the equipment to service.

Training

- It will be the responsibility of the Superintendent, Plant Managers/Operators, Equipment Manager or equivalent to ensure their staff is trained on Milestone Contractors' lockout/tagout procedures to include:
 - Each affected employee will receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.
 - Each affected employee will be instructed in the purpose and use of the energy control procedure.
 - All other employees whose work operations are or may be in an area where energy control procedures may be utilized, will be instructed about the procedure and about the prohibition

relating to attempts to restart or reenergize machines or equipment which are locked or tagged out.

- o When tagout systems are used, employees will also be trained in the following limitations of tags:
- o Tags are essential warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock.
- o When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized person responsible for it, and it is never to be bypassed, ignored, or otherwise defeated.
- o Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area, in order to be effective.
- o Tags and their means of attachment must be made of materials, which will withstand the environmental conditions encountered in the workplace.
- o Tags may evoke a false sense of security and their meaning needs to be understood as part of the overall energy control program.
- o Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or incidentally detached during use.

Employee Retraining

- Retraining will be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the energy control procedures.
 - o Additional retraining will also be conducted whenever a periodic inspection reveals a deficiency, or whenever the employer has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.
 - o The retraining will reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary.

Program Review

The Safety Department will review this program annually to ensure that procedures are being followed.

Hand/Power Tool Safety

The following outlines the safety guidelines to be observed by employees, when operating hand and power tools. The company will provide employees with a variety of hand and power tools to enable them to accomplish their tasks safely and effectively.

Employees shall observe the following guidelines:

- Use the right tool for the job.
- Examine tools for defects before use. Do not use tools with frayed cords, loose or broken switches cracked housings, mushroomed or splintered heads, etc.
- Make sure that the power tools have an electrical grounding prong (GFCI) in place or that it is marked "double insulated."
- Keep all tools in good condition with regular maintenance.
- Remove from service and tag all tools requiring repair or disposal.
- Know the application, limitation, and potential hazards of the tool used.
- Operate according to the manufacturer's instructions.
- Use eye protection and other appropriate PPE.
- Keep guards in place, in working order, and properly adjusted.
- Maintain proper housekeeping in work areas.
- Remain alert to the potential hazards in the working environment such as slippery floors, standing water or the presence of highly combustible materials.

Hand tools are non-powered. They include anything from axes to wrenches. The greatest hazards posed by hand tools result from misuse and improper maintenance.

The supervisor is responsible for the safe condition of tools and equipment, used by employees, but employees have the responsibility of properly using, maintaining tools, and reporting any deficiencies.

Saw blades, self-retracting knives, or other tools should be directed away the user's body and other workers.

Self-retracting knives and cutting tools must be maintained in proper working order. When employees are working with sharp tools, they should use appropriate PPE such as cut resistant gloves, wrist guards, arm guards, and aprons or belly guards.

Around flammable substances intrinsically safe tools shall be used (plastic, brass etc.). When any tool will create a spark, which may ignite a fire, a fire extinguisher shall be close at hand.

Power tools can be hazardous when improperly used. There are several types of power tools, based on the power source they use: electric, pneumatic, liquid fuel, hydraulic, and explosive actuated. Workers shall be trained in the use and limitation of their power tools and should understand potential hazards and safety precautions to prevent those hazards from occurring.

General Use Guidelines for Power Tools

- Never carry a tool by the cord or pressure hose.
- Never yank the cord or the hose to disconnect the tool from the electrical outlet or power source.
- Tools should be plugged into GFCI (Ground Fault Circuit Interrupters) when using electrical power tools unless the power source is a receptacle in a permanent structure, or the tool is double insulated.
- Keep cords and hoses away from heat, oil, and sharp edges.
- Disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits, and cutters. Saw blades should be removed for storage.
- All observers should be kept at a safe distance from the work area.
- Secure work with clamps or a vise, freeing both hands to operate the tool.
- Avoid incidental starting. The worker should not hold a finger on the switch button while carrying a plugged-in tool.
- Be sure to keep good footing and maintain good balance.
- The proper apparel should be worn. Loose clothing, ties, or jewelry can become caught in moving parts.
- All portable electric tools that are damaged must be removed and tagged "Do Not Use."
- All power tools should be unplugged and/or off during blade, wheel, saw, or attachment mounting changing or setup.

Hazardous moving parts of a power tool need to be safeguarded, with machine guards. For example, belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment must be guarded if such parts are exposed to contact by workers. Guards, as necessary, should be provided to protect the operator and others from point of operation, in running nip points, rotating parts, and flying chips and sparks.

- Safety guards must not be removed. Safety switches must be kept functional and must not be modified.
- Do not alter constant pressure switches on power tools that will shut off the power.
- The use of chaps or other protective clothing shall be determined by hazard analysis.

NOTE: Operations of other saw types such as those for wood working require Hand, Head, Face, and Eye protection at a minimum. Chain saws require Chaps as well as Hand, Head, Face, and Eye protection.

- The following general practices should be followed when using electric tools:
- Electric tools should be operated within their design limitations.
- Gloves and safety footwear are recommended during use of electric tools.
- When not in use, tools should be stored in a dry place.
- Electric tools should not be used in damp or wet locations.

Powered abrasive grinding, cutting, polishing, and wire buffing wheels create special safety problems because they may throw off flying fragments.

- Before an abrasive wheel is mounted, it should be inspected closely and sound or ring-tested to be sure that it is free from cracks or defects. To test, wheels should be tapped gently with a light nonmetallic instrument. If they sound cracked or dead, they could fly apart in operation and so must not be used. A sound and undamaged wheel will give a clear metallic tone or "ring."

- To prevent the wheel from cracking, the user should be sure it fits freely on the spindle. The spindle nut must be tightened enough to hold the wheel in place, but not tight enough to distort the flange. Follow the manufacturer's recommendations. Care must be taken to assure that the spindle speed will not exceed the abrasive wheel specifications.
- Due to the possibility of a wheel disintegrating (exploding) during startup, a worker should never stand directly in front of the wheel.
- Portable grinding tools need to be equipped with safety guards to protect workers, not only from the moving wheel surface, but also from flying fragments in case of breakage.
- In addition, when using a powered grinder: 1) always wear eye and face protection; 2) turn off the power when not in use; and 3) never clamp a hand-held grinder in a vise.

Demolition/Cut-off/Quickie Saw Use

- Saw Blades shall be taken off prior to storage and stored in a dry area.
- Blades shall be inspected prior to use and should be the proper size and RMP for the saw.
- Metal blades should be used where at all feasible to reduce the risk of shattering fiber blades. Remove any cracked or broken blades from service.
- Water is required when dust may be generated and/or materials may contain silica.
- Workers are required to wear hearing protection, eye protection and face protection during use.
- The saw guard should be positioned to protect the worker depending on the cut angle.
- Workers shall stand to the side of the saw to avoid kickback injury and evaluate the cut and abate possible pinch points for the saw blade with proper blocking of the material or the use of shims.

Chippers, drills, hammers, and sanders and similar power tools.

- The main hazard is getting hit by one of the tool's attachments, or fasteners, that the employee is using. Eye and face protection is required.
- Noise is another hazard. Working with noisy tools such as jackhammers requires proper use of ear protection.
- When using pneumatic tools, workers must check to see that the tools are fastened securely to the hose by a positive means to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard.
- In general, the same precautions should be taken with an air hose that are recommended for electric cords, since the hose is subject to the same kind of damage or incidental striking and presents tripping hazards.
- A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel.
- Screens or safe access zones must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills.
- Compressed air guns should never be pointed toward anyone. The user should never press it against their self or anyone else.
- Do not use compressed air for cleaning, except were reduced to less than 30 psi with effective chip guarding and PPE.
- If an air hose is more than one-half inch in diameter, a safety excess flow valve must be installed at the source of the air supply to shut off the air automatically in case the hose breaks.
- Workers operating a jackhammer must wear safety glasses, face shields, hearing protection, safety shoes, metatarsal guards, and impact gloves, which protect against injury if the hammer slips or falls. Job rotation to avoid fatigue is encouraged.
- Some tools are fuel powered, usually by gasoline. The most serious hazard with fuel-powered tools comes from fuel vapors that can burn or explode and give off dangerous exhaust fumes.
- Transporting and storing fuel in appropriate flame arresting containers, according to proper procedures for flammable liquids.
- Before the tank for a fuel-powered tool is refilled, the user must shut the engine down and allow it to cool to prevent incidental igniting of hazardous vapors.
- If a fuel-powered tool is used inside an enclosed area, effective ventilation and/or PPE is necessary to avoid breathing carbon monoxide. Fire extinguishers must be available in the area.

Explosive-actuated tools or Powder-actuated tools (a.k.a. nail guns, etc.) operate almost like a loaded gun and should be treated with the same respect and precautions. In fact, they are so dangerous that

they must be operated only by specially trained and licensed workers. Workers should take the following precautions:

- These tools should not be used in an explosive or flammable atmosphere.
- Before using the tool, the worker should inspect it to determine that it is clean, that all moving parts operate freely, and the barrel is free from obstructions.
- The tool should never be pointed at anybody.
- The tool should not be loaded unless it is to be used immediately. A loaded tool should not be left unattended, especially where it would be available to unauthorized persons.
- Hands should be kept clear of the barrel end.
- To prevent the tool from firing accidentally, two separate motions are required for ignition: 1) pressing into the work surface; and 2) pulling the trigger.
- If an explosive-actuated tool misfires, the worker should wait at least 30 seconds, then try firing it again. If it still will not fire, the user should wait another 30 seconds so that the faulty cartridge is less likely to explode, then carefully remove the load. The bad cartridge should be put in water.
- Suitable eye and face protection are essential when using an explosive-actuated tool.
- The muzzle end of the tool must have a protective shield or guard centered perpendicularly on the barrel to confine any flying fragments or particles which might otherwise create a hazard when the tool is fired. The tool must be designed so that it will not fire unless it has this kind of safety device.
- All explosive-actuated tools must be designed for varying powder charges so that the user can select a powder level necessary to do the work without excessive force.
- If the tool develops a defect during use, it should be tagged and taken out of service immediately until it is properly repaired.
- Fasteners must not be fired into material which would let them pass through to the other side. The fastener must not be driven into materials like brick or concrete any closer than three inches to an edge of corner. In steel, the fastener must not come any closer than a half inch from a corner or edge. Fasteners must not be driven into very hard or brittle materials which might chip, splatter, or make the fastener ricochet.
- No one should be standing or have any body parts behind the material being nailed.

Material Handling

The use of material handling equipment should be utilized as the preferred method of handling materials if feasible. If not, plan your lift and use proper lifting techniques. Lift with your legs, not your back and avoid twisting. Stretch your muscles before lifting. Do not be embarrassed to ask for help. Watch your footing, particularly when carrying material.

General Precautions that must be followed to prevent injuries while handling materials are:

- When lifting in tandem or with equipment and multiple individuals are involved, a verbal and/or written lift plan should be utilized to avoid injury and ensure a safe lift.
- Use adequate PPE, such as the appropriate gloves and sleeves to prevent cuts.
- Inspect materials for slivers, jagged, or sharp edges, burns, rough, or slippery surface.
- Grasp the object with a firm grip.
- Keep fingers away from pinch and shear points, especially when setting down materials.
- Wipe off greasy, wet, slippery, or dirty objects before trying to handle them.

Manual Lifting Techniques

- Squat Lifting
 - Keep feet parted - one alongside, one behind the object.
 - Keep back straight, nearly vertical.
 - Tuck elbows and arms in and hold load close to body.
 - Grasp the object with the whole hand.
 - Tuck your chin in.
 - Keep body weight directly over feet.
- Team Lifting and Carrying - When two or more people carry one object:
 - Communicate and plan the lift to avoid shifting loads, ensure proper timing, etc.
 - Workers should adjust the load so that it rides level ensuring each person carries an equal part.

- Test lifts should be made before proceeding.
- When carrying long sections of pipe, lumber, ladders, or steel they should carry them on the same side of the body.

Handling Specific Shapes

- Boxes, Cartons, and Sacks
 - Grasp the alternate top and bottom corner.
 - Materials should be grasped at opposite corners.
 - Upon reaching an erect position, let the material rest against the hip and belly, then lift the material to one shoulder.
 - As the material reaches the shoulder, the worker should stoop slightly, put a hand on the hip so that the material rests comfortably.
- Barrels and Drums
 - When handling a drum, one should request assistance or use a drum tilter or other mechanical assistance (two-wheeled dolly equipped for drums).
 - If necessary, to roll a barrel or drum, the worker should push against the sides with their hands.
 - Do not stand in the path of the moving barrel.

Hand Trucks, Carts, And Dollies

- Safe Procedures for Using Two-Wheeled Trucks or Carts
 - Trucks or carts should be evenly loaded to prevent tipping.
 - Tip the load to be lifted forward slightly so that the tongue of the truck goes under the load.
 - Push the truck all the way under the load to be moved.
 - Keep the load's center of gravity as low as possible. Place heavy objects below lighter objects.
 - Place the load well forward so the weight will be carried by the axle, not by the handles.
 - Place the load so it will not slip, shift, or fall and secure items as necessary.
 - Load only to a height that will allow a clear view ahead.
 - Let the truck carry the load. The operator should only balance and push.
 - Never walk backwards with a hand truck.
 - For extremely bulky items or pressurized items, such as gas cylinders, strap or chain the item to the truck.
 - When going down an incline, keep the truck ahead so that it can be observed at all times.

Transport

- Materials and Equipment to be transported must be secured, with emergency brake engaged.
- Heavy items transported in pickup trucks or items that may become projectiles in the case of an accident should be secured to the bed or in toolboxes.
- Vehicles should be driven as if fully loaded with no sudden start/stops to cause load shifting.

Aerial Lift Safety

To safely operate an aerial lift (aka manlifts, scissor lifts), workers must be trained in the safe operation and use. Lifts operated incorrectly put workers in danger of crushing injuries and falls.

Training

- Individuals operating an aerial lift must receive on the job training on each specific aerial lift they will be using.
- Occupants of the aerial lift should be trained in the proper donning and use of fall protection.
- At least one ground person in the vicinity of the working aerial lift must be trained on the use of the aerial lifts ground controls.
- Training will include but not be limited to:
 - Explanations of electrical, fall, and falling object hazards.
 - Procedures for dealing with hazards.
 - Recognizing and avoiding unsafe conditions in the work setting.
 - Instructions for correct operation of the lift (including maximum intended load and load capacity).
 - Demonstrations of the skills and knowledge needed to operate an aerial lift before operating it on the job.
 - When and how to perform inspections.

- Manufacturer's requirements.

Rules of Use

- Only authorized persons shall operate an aerial lift. ("Authorized person" means a person approved or assigned by the employer to perform a specific type of duty or duties or to be at a specific location or locations at the jobsite.)
- Occupants of aerial lifts must use safety harnesses.
- Lanyards must be retractable or fixed length to prevent occupants from free falling more than 6'.
- To anchor a fall-protection lanyard, you must clip it only to the approved spot on the aerial lift.
- Do not anchor yourself to a structure outside of the lift, and don't clip yourself to another part of the lift.
- Avoid wrapping your lanyard around a railing or tying it into a knot. Safety clip spots should be steel welded to the structure.
- When working over or adjacent to water, when a fall into water is possible, occupants, must also wear an approved life vest.
- Keep your feet firmly on the platform floor.
- Do not sit on the railing, lean out of the basket, or prop your feet up on any structure, including the toe board.
- Never brace yourself with one foot outside the lift.
- Boom and basket load limits specified by the manufacturer shall not be exceeded.
- An aerial lift shall not be moved when the boom is elevated in a working position with men in the basket, except for equipment which is specifically designed for this type of operation. (see manufacturer's recommendations)
- Ground conditions should be evaluated prior to operation. Areas such as wet ground, holes, loose uncompacted subgrade should not be driven on.

Exiting the Aerial Lift

If you need to leave the lift at a height to complete a work tasks, 100% tie off is required.

Other safety practices to follow include:

- Do not move the lift from one location to another while the work platform is in the air or while someone is working on the platform.
- Pay attention to power lines and overhead hazards.
- Always use brakes and stabilizers.

Operation/Traveling/Loading:

- Do not exceed the load-capacity limits. Take the combined weight of the worker(s), tools and materials into account when calculating the load.
- Do not use the aerial lift as a crane.
- Do not carry objects larger than the platform.
- Do not operate lower-level controls unless permission is obtained from the worker(s) in the lift (except in emergencies).
- Do not exceed vertical or horizontal reach limits.
- Do not operate an aerial lift in high winds above those recommended by the manufacturer.
- Do not override hydraulic, mechanical, or electrical safety devices.

Inspections

- Aerial lifts must be inspected annually.
- Aerial lift must be inspected at the beginning of each shift by each different operator and documented per the Equipment Inspection Sheet.
- Defective equipment should be locked/tagged out and supervisors should be notified immediately.
- The vehicle inspection includes checking:
 - Brakes
 - Hydraulic levels
 - Coolant levels
 - Oil levels
 - Fuel
 - Leaks
 - Wheels

- Batteries
- Chargers
- Steering components
- Lower-level lift controls
- The lift inspection should include:
 - Lift controls shall be tested each day prior to use to determine that such controls are in safe working condition.
 - Emergency controls
 - Personal safety devices
 - Insulation
 - Any missing or unreadable safety information, including placards
 - Hydraulics, pneumatics, electricity, and fuel
 - Fasteners and pins
 - Stabilizers and outriggers
 - Cables
 - Wiring harnesses
 - Guardrails
 - Any loose or missing parts
- Worksite inspections need to include:
 - Terrain (contains loose dirt, holes, or drop-offs)
 - Ceiling heights (to include bridge decks, beams, plant equipment, etc.)
 - Bumps, ditches, and slopes
 - Floor obstructions such as debris
 - Overhead hazards, including electrical lines
 - Weather conditions, such as high wind or ice
 - Places where every worker is stationed, especially in relation to the lift's position
 - Any other hazards or obstructions

Fall Rescue

Should an individual fall from a manlift, the following should be used during rescue efforts.

NOTE: If the ground controls are not accessible, call 911 immediately.

- Ground personnel will lower the manlift to allow the individual to safely touchdown, without injury.
- Onsite secondary manlifts may be used to assist in rescue efforts.
- Onsite ladders that may be safely secured, may be used to assist in rescue efforts.
- Individuals who have fallen must be medically evaluated.
- Lanyards and harnesses worn by the rescued individual(s) must be taken out of service.

Retraining

Workers should be retrained if any of the following conditions occur:

- An accident occurs during aerial lift use.
- Workplace hazards involving an aerial lift are discovered, or
- A different type of aerial lift is used.

Employers are also required to retrain workers who they observe operating an aerial lift improperly.

Fork Truck Safety

Material handling is a significant safety concern at Milestone Contractor's. During the movement of products and materials, there are numerous opportunities for personal injury and property damage if proper procedures and caution are not used. This program applies to all powered industrial trucks (PIT), including forklifts, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines. The information in this program and applicable standards should be used to train prospective industrial truck operators and provide the basis for refresher and annual retraining.

The Safety Department is responsible for developing, implementing, and administering Milestone's forklift safety program. The Safety Department will review the forklift safety program annually and make

recommendations for revisions if necessary. The Safety Department must ensure that all employees who operate or work near forklifts are properly trained.

Superintendent/Supervisors must ensure that their employees follow safe operating procedures when using forklifts. Employees who operate forklifts must follow the safe operating procedures specified below.

OSHA's standard on powered industrial trucks is 1910.178. The applicable voluntary consensus standard is ANSI B56.1, American National Standard for Powered Industrial Trucks. In addition to these standards, Superintendent/Supervisors and employees should follow the procedures described in operator's manuals supplied by the manufacturers.

Pre-Qualifications for Powered Industrial Truck Operators

All candidates for powered industrial truck (PIT) operators must meet the following basic requirements prior to starting initial or annual training:

- No adverse vision problems that cannot be corrected by glasses or contacts.
- No adverse hearing loss that cannot be corrected with hearing aids.
- No physical impairments that would impair safe operation of the PIT.
- No neurological disorders that affect balance or consciousness.
- Not taking any medication that affects perception, vision, or physical abilities.

Training

Training for PIT operators must be conducted by an experienced trainer or operator, selected by the Safety Department. All operational training must be conducted under close supervision. All training and evaluation must be completed before an operator is permitted to use a PIT without continual and close supervision.

Training consists of a combination of formal instruction, practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace. Trainees may operate a powered industrial truck only:

- under the direct supervision of persons, selected by the Safety Department, who have the knowledge, training, and experience to train operators and evaluate their competence; and
- where such operation does not endanger the trainee or other employees.

Initial Training

As specified in the OSHA standard, PIT operators must receive initial training in the following truck-related and workplace-related topics.

Truck-related topics:

- differences between the truck and automobiles;
- truck controls and instrumentation;
- engine or motor operation;
- steering and maneuvering;
- visibility (including restrictions due to loading);
- fork and attachment adaptation, operation, and use limitations;
- vehicle capacity;
- vehicle stability;
- vehicle inspection and maintenance that the operator will be required to perform;
- refueling and/or charging and recharging of batteries;
- operating limitations; and
- operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

Workplace-related topics:

- surface conditions where the vehicle will be operated;
- composition of loads to be carried and load stability;
- load manipulation, stacking, and unstacking;
- pedestrian traffic in areas where the vehicle will be operated;
- narrow aisles and other restricted places where the vehicle will be operated;

- hazardous (classified) locations where the vehicle will be operated;
- ramps and other sloped surfaces that would affect the vehicles' stability;
- closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust; and
- other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation

Refresher Training and Evaluation

Refresher training, including an evaluation of the effectiveness of that training, must be conducted to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely.

Refresher training in relevant topics must be provided to the operator in the following situations:

- The operator has been observed operating the vehicle in an unsafe manner.
- The operator has been involved in an incident or near-miss incident.
- The operator has received an evaluation that reveals that the operator is not operating the truck safely.
- The operator is assigned to drive a different type of truck.
- A condition in the workplace changes in a manner that could affect safe operation of the truck.

Once every three years, an evaluation will be conducted of each powered industrial truck operator's performance.

Safe Operating Procedures

- **Only authorized and trained personnel will operate PITs.**
- All PITs will be equipped with a headache rack, fire extinguisher, rotating beacon, back-up alarm, and seat belts. The operator will wear seatbelts at all times.
- The operator will perform documented daily pre-use inspections at the beginning of each shift or by each new operator prior to use.
- Any safety defects (such as hydraulic fluid leaks; defective brakes, steering, lights, or horn; and/or missing fire extinguisher, lights, seat belt, or back-up alarm) will be reported for immediate repair or the PIT will be taken out of service.
- Operators will follow the proper recharging or refueling safety procedures.
- Loads will be tilted back and carried no more than six inches from the ground. Loads that restrict the operator's vision will be transported backwards.
- PIT operators will obey plant speed limits and slow down on wet floors and going around turns.
- Hard hats will be worn by PIT operators in high lift areas.
- Operator will sound the horn and use extreme caution when meeting pedestrians, making turns, and cornering.
- Passengers may not ride on any portion of a PIT. Only the operator will ride PITs. "NO PASSENGERS" decals will be affixed on all PITs.
- If PITs are used as a man lift, an appropriate man lift platform (cage with standard rails and toe-boards) will be used.
- Aisles will be maintained free from obstructions, marked, and wide enough (six-foot minimum) for vehicle operation.
- Lift capacity will be marked on all PITs. Operators will ensure the load does not exceed rated weight limits.
- When unattended, PITs will be turned off, forks lowered to the ground, and the parking brake applied.
- All PITs (with the exception of pallet jacks) will be equipped with a multi-purpose dry chemical fire extinguisher (minimum rating; 2A:10B:C).
- Operators must report all incidents, regardless of fault and severity, to the Safety Department. The Safety Department will conduct an incident investigation.
- When loading rail cars and trailers, dock plates will be used. Operators will assure dock plates are in good condition and will store them on edge when not in use.
- Rail cars and trailers will be parked squarely to the loading area and have wheels chocked in place. Operators will follow established docking/undocking procedures.

Changing and Charging Storage Batteries

- Battery charging installations must be located in areas designated for that purpose.

- Facilities must be provided for flushing and neutralizing spilled electrolyte, for fire protection, for protecting charging apparatus from damage by trucks, and for adequate ventilation for dispersal of fumes from gassing batteries.
- A conveyor, overhead hoist, or equivalent material handling equipment must be provided for handling batteries.
- Reinstalled batteries must be properly positioned and secured in the truck.
- A carbon filter or siphon must be provided for handling electrolyte.
- When charging batteries, acid must be poured into water. Water must not be poured into acid.
- Trucks must be properly positioned, and brake applied before attempting to change or charge batteries.
- Care must be taken to assure that vent caps are functioning. The battery (or compartment) cover(s) must be open to dissipate heat.
- Smoking is prohibited in the charging area.
- Precautions must be taken to prevent open flames, sparks, or electric arcs in battery charging areas.
- Tools and other metallic objects must be kept away from the top of uncovered batteries.

Trucks and Railroad Cars

- Check the flooring of trucks, trailers, and railroad cars for breaks and weakness before driving onto them.
- The brakes of highway trucks must be set, and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks.
- Wheel stops or other recognized positive protection must be provided to prevent railroad cars from moving during loading or unloading operations.
- Fixed jacks may be necessary to support a semitrailer and prevent upending during the loading or unloading when the trailer is not coupled to a tractor.
- Positive protection must be provided to prevent railroad cars from being moved while dock boards or bridge plates are in position.

Operations

- If at any time a powered industrial truck is found to be in disrepair, defective, or in any way unsafe, the truck must be taken out of service until it has been restored to safe operating condition.
- Trucks must not be driven up to anyone standing in front of a bench or other fixed object.
- No person will be allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.
- Unauthorized personnel may not ride on powered industrial trucks.
- Arms or legs may not be placed between the uprights of the mast or outside the running lines of the truck.
- When a powered industrial truck is left unattended, load engaging means must be fully lowered, controls neutralized, power shut off, and brakes set. Wheels must be blocked if the truck is parked on an incline.
- A safe distance must be maintained from the edge of ramps or platforms while on any elevated dock, platform, or freight car. Trucks must not be used for opening or closing freight doors.
- There must be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- An overhead guard must be used as protection against falling objects. An overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling capacity load.
- A load backrest extension must be used whenever necessary to minimize the possibility of the load or part of it from falling rearward.
- Trucks must not be parked so as to block fire aisles, access to stairways, or fire equipment.

Traveling

- All traffic regulations must be observed, including authorized speed limits. A safe distance must be maintained, approximately three truck lengths from the truck ahead, and the truck must be kept under control at all times.
- The right of way must be yielded to ambulances, fire trucks, or other vehicles in emergency situations.

- Do not pass other trucks traveling in the same direction at intersections, blind spots, or other dangerous locations.
- The driver must slow down and sound the horn at cross aisles and other locations where vision is obstructed. If the load being carried obstructs forward view, the driver must travel with the load trailing.
- Railroad tracks must be crossed diagonally wherever possible. Parking closer than eight feet from the center of railroad tracks is prohibited.
- The driver must look in the direction of and keep a clear view of the path of travel.
- Grades must be ascended and descended slowly. When ascending or descending grades in excess of 10 percent, loaded trucks must be driven with the load upgrade. On all grades, the load and load engaging means must be tilted back if applicable and raised only as far as necessary to clear the road surface.
- Under all travel conditions the truck must be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay are prohibited.
- The driver must slow down on wet and slippery floors.
- Dockboard or bridgeplates must be properly secured before they are driven over. Dockboard or bridgeplates must be driven over carefully and slowly and their rated capacity never exceeded.
- Avoid running over loose objects on the roadway surface.

Loading

- Only stable or safely arranged loads can be handled.
- Only loads within the rated capacity of the truck can be handled.
- Adjust the long or high (including multiple-tiered) loads that may affect capacity.
- Trucks equipped with attachments must be operated as partially loaded trucks when not handling a load.
- Forks must be placed under the load as far as possible. The mast must be carefully tilted backward to stabilize the load.
- Use extreme care when tilting the load forward or backward, particularly when high tiering. Tilting forward with load engaging means elevated is prohibited except to pick up a load. An elevated load may not be tilted forward except when the load is in a deposit position over a rack or stack. When stacking or tiering, use only enough backward tilt to stabilize the load.

Fueling Safety

- Fuel tanks may not be filled while the engine is running. Avoid spillage.
- Spillage of oil or fuel must be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- No truck can be operated with a leak in the fuel system until the leak has been corrected.
- Do not use open flames for checking electrolyte level in storage batteries or gasoline level in fuel tanks.

Maintenance

- Any power-operated industrial truck not in safe operating condition must be removed from service. All repairs must be made by authorized personnel.
- Those repairs to the fuel and ignition systems of industrial trucks that involve fire hazards must be conducted only in locations designated for such repairs.
- Trucks in need of repairs to the electrical system must have the battery disconnected before such repairs.
- All parts of any such industrial truck requiring replacement must be replaced only by parts equivalent as to safety with those used in the original design.
- Industrial trucks must not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer. They also cannot be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts. Additional counterweighting of fork trucks must not be done unless approved by the truck manufacturer.
- Industrial trucks must be examined before being placed in service and must not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle. Such examination

must be made at least daily. Where industrial trucks are used on a round-the-clock basis, they must be examined before each shift. Any defects must be immediately reported and corrected.

- When the temperature of any part of any truck is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the vehicle must be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Industrial trucks must be kept in a clean condition, free of lint, excess oil, and grease. Noncombustible agents should be used for cleaning trucks.

Crane & Rigging Safety

Many types of cranes, hoists, and rigging devices may be used at Milestone for lifting and moving materials. Milestone Contractor's policy is to maintain a safe workplace for its employees; therefore, it cannot be overemphasized that only certified and qualified individuals shall operate these devices, assemble/disassemble cranes, apply rigging equipment or signal direction, per the manufacturer's recommendations. The safety rules and guidance in this policy applies to all operations at a Milestone jobsite that involves the use of mobile cranes and gantry cranes Milestone employees, supplemental labor, and subcontractor personnel who use such devices.

Responsibilities

Supervisors are responsible for:

- Requesting employees through the Union Hall or Milestone ranks who have received the required training to operate, signal, rig, and assemble/disassemble the cranes and hoists per verification with union hall or Milestone training records.
- Operators must be National Commission of Certified Crane Operators (NCCCO) Certified
- Designated NCCCO Certified Operators and Supervisors will act as the Assembly/Disassembly director. A/D Director Supervisors must have a NCCCO Certified Operator to assist.
- Supervisors are responsible for requesting a fax from the union stating that the individual is either certified or qualified per CFR 1926, Subpart CC. Faxes should be sent to the Indianapolis office, attention Human Resources.
- A Qualified person means a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, successfully demonstrated the ability to solve/resolve problems relating to the subject matter, the work, or the project.

Crane and Hoist Operators are responsible for:

- Operating hoisting equipment safely.
- Selecting and using rigging equipment appropriately.
- Personal safety while operating cranes or hoists.
- Ensuring that hoisting equipment is inspected daily while onsite using the Equipment Inspection Ticket.

Equipment Department is responsible for:

- Performing annual maintenance and inspection of all Milestone cranes and hoists that are not covered by a program with maintenance responsibility. This must be done by a competent person recognized by the Department of Labor.
- Maintaining written records of inspections and tests and providing copies of all inspections and test results to the Milestone equipment group who have cranes and hoists on file.
- Maintaining all manuals for cranes and hoists in a central file for reference.

Safe Operating Requirements

Milestone requests and hires individuals from the Union Hall who have been specifically trained in crane and hoist operations and equipment safety per CFR 1926 Subpart CC. When requesting operators, the supervisor will specify the type of crane to be use.

Crane and Hoist Operators

To be qualified as a Crane and Hoist Operator, the candidate shall have received hands-on training from a qualified crane and hoist operator designated by the candidate's Union Hall or have adequate prior experience and pass the union competency test.

Assembly/Disassembly Responsibilities

- The rule requires the work to be directed by an A/D (Assembly/Disassembly) director. The A/D director must meet the criteria for both a "competent person" and a "qualified person," which are defined terms in this rule, or must be a "competent person" assisted by a "qualified person."
- A/D Directors will be a designated NCCCO Operators or Supervisor. Supervisors must work in conjunction with a NCCCO Operator.
- The A/D director must understand the applicable procedures.
- The A/D director must review the procedures immediately prior to beginning work unless he or she understands the procedures and has used them before for that equipment type and configuration.
- The A/D director must ensure that each member of the crew understands his or her tasks, the hazards of the tasks, and any hazardous positions or locations to avoid.
- The A/D director must verify all capacities of any equipment used, including rigging, lifting lugs, etc.
- The A/D director must also address hazards associated with the operation, including 12 specified areas of concern: site and ground conditions, blocking material, proper location of blocking, verifying assist crane loads, boom & jib pick points, center of gravity, stability upon pin removal, snagging, struck by counterweights, boom hoist brake failure, loss of backward stability, and wind speed and weather.
- Inspection

Upon completion of assembly, but before use, the equipment must be inspected by a "qualified person" to ensure that it is configured in accordance with the manufacturer equipment criteria. If these criteria are unavailable Milestone's "qualified person," with the assistance of a registered professional engineer if necessary, must develop the appropriate configuration criteria and ensure that these criteria are met.

Crane and Hoist Safety Design Requirements

Following are the design requirements for cranes and hoists and their components:

- The design of all commercial cranes and hoists shall comply with the requirements of ASME/ANSI B30 standards and Crane Manufacturer's Association of America standards (CMAA-70 and CMAA-74). All crane and hoist hooks shall have safety latches.
- Hooks shall not be painted (or re-painted) if the paint previously applied by the manufacturer is worn.
- Crane pendants shall have an electrical disconnect switch or button to open the main-line control circuit.
- Cranes and hoists shall have a main electrical disconnect switch. This switch shall be in a separate box that is labeled with lockout capability.
- Crane bridges and hoist monorails shall be labeled on both sides with the maximum capacity.
- Each hoist-hook block shall be labeled with the maximum hook capacity.
- A device such as an upper-limit switch or slip clutch shall be installed on all building cranes and hoists. A lower-limit switch may be required when there is insufficient hoist rope on the drum to reach the lowest point.
- All cab and remotely operated bridge cranes shall have a motion alarm to signal bridge movement.
- All newly installed cranes and hoists, or those that have been extensively repaired or rebuilt structurally, shall be load tested at 125% capacity prior to being placed into service.
- If an overload device is installed, a load test to the adjusted setting is required.

General Safety Rules

Operators shall comply with the following rules while operating the cranes and hoists:

- Do not engage in any practice that will divert your attention while operating the crane.
- Respond to signals only from the person who is directing the lift, or any appointed signal person. Always obey a stop signal, no matter who gives it.
- Unless electrical lines have been de-energized or grounded at point of work, crane operators shall maintain a minimum clearance of 20 feet.
- Do not move a load over people. People shall not be placed in jeopardy by being under a suspended load. Also, do not work under a suspended load unless the load is supported by blocks, jacks, or a solid footing that will safely support the entire weight. Have a crane or hoist operator remain at the controls or lock open and tag the main electrical disconnect switch.
- Ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded. Know the weight of the object being lifted or use a dynamometer or load cell to determine the weight.

- Check that all controls are in the OFF position before closing the main line disconnect switch.
- If spring-loaded reels are provided to lift pendants clear off the work area, ease the pendant up into the stop to prevent damaging the wire.
- Avoid side pulls. These can cause the hoist rope to slip out of the drum groove, damaging the rope or destabilizing the crane or hoist.
- To prevent shock loading, avoid sudden stops or starts. Shock loading can occur when a suspended load is accelerated or decelerated and can overload the crane or hoist. When completing an upward or downward motion, ease the load slowly to a stop.
- An accessible fire extinguisher shall be available at all operator stations or cabs of all Milestone owned or leased cranes.

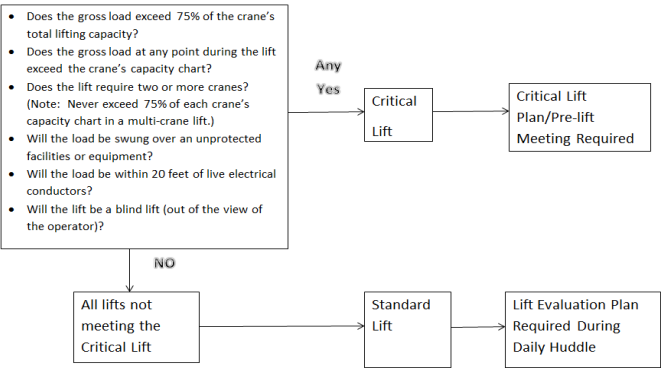
Lift Planning

Crane lifts require analysis to ensure that the lift is made safely and that all parties involved are trained, and aware of the elements of the lift. Critical lifts will require a lift plan and documented pre-lift meeting. All other lifts will be evaluated and discussed during the daily huddle meeting.

Critical Lift Identifiers (Yes to any of the items below will signify a Critical Lift)

- Does the gross load exceed 75% of the crane's total lifting capacity?
- Does the gross load at any point during the lift exceed the crane's capacity chart?
- Does the lift require two or more cranes? (Note: Never exceed 75% of each crane's capacity chart in a multi-crane lift.)
- Will the load be swung over an unprotected facility or equipment?
- Will the load be within 20 feet of live electrical conductors?
- Will the lift be a blind lift (out of the view of the operator)?

Critical Lift Criteria (Yes to any below is a Critical Lift) **Lift Classification** **Required Action**



Developing the Lift Plan

Before making a critical lift, a critical lift plan, prepared by a qualified person such as the crane operator, supervisor, or rigger, should be considered. The lift plan should be documented in writing and made available to all personnel involved in the lift. The critical lift plan includes the following information:

- Description of the lift
- Crane position and configuration
- Lift height
- Load radius
- Boom length and angle
- Size and weight of the load

- Percent of crane's rated capacity
- Personnel involved
- Rigging plan
- Communication method
- Ground conditions
- Environmental conditions
- Inspection procedures

NOTE: Leased cranes with operators will adhere to OSHA requirements and lift plans.

Wind Speed

Critical lifts should not be made with wind speeds over 20 mph unless derated wind charts are available from the manufacturer.

Weather conditions can adversely affect lifting activities. They need to be thoroughly considered both during the planning and execution of a lift. Noncritical lifts may be made at higher wind speeds upon review by the crane operator and supervisor.

Pre-Lift Meeting

A pre-lift meeting involving the participating personnel (i.e. crane operator, lift supervisor, rigger, signaler) should be conducted prior to making a critical lift. The critical lift plan should be reviewed to ensure that the project team is prepared to safely conduct the lift.

Ground Pressure

Milestone is responsible to ensure the ground conditions are safe and stable as outlined below by OSHA 1926.1402

"The equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met. The requirement for the ground to be drained does not apply to marshes/wetlands."

Milestone must:

- Ensure that ground preparations necessary to meet the requirements in paragraph of this section are provided.
- Inform the user of the equipment and the operator of the location of hazards beneath the equipment set-up area (such as voids, tanks, utilities) if those hazards are identified in documents (such as site drawings, as-built drawings, and soil analyses) that are in the possession of the controlling entity (whether at the site or off-site) or the hazards are otherwise known to that controlling entity.
- If there is no controlling entity for the project, the requirement in paragraph of this section must be met by the employer that has authority at the site to make or arrange for ground preparations needed to meet paragraph of this section.
- If the A/D director or the operator determines that ground conditions do not meet the requirements in paragraph of this section, that person's employer must have a discussion with the controlling entity regarding the ground preparations that are needed so that, with the use of suitable supporting materials/devices (if necessary), the requirements in paragraph of this section can be met."

The following will be done at a minimum by onsite personnel to ensure safe ground conditions and crane operations:

- Pre-evaluate crane pad
- Use Crane Manufacturers Load Pressure Calculations where available as necessary.
- Provide Geotechnical testing where necessary.
- Proof roll area
- Use Crane pads as necessary
- Site Supervisor (Competent Person) to observe tracks and outriggers for shifting during lift.
- Stop work and adjust if settlement occurs.

Lifts Near Excavations

- Keep crane tracks at least 2' from edge of excavation in all soil types
- A minimum theoretical 1:1 slope from toe of excavation to the crane track edge should be kept at all times.
- Contact supervisor for any critical lifts near open excavations or non-critical lifts near open excavations greater than 20 feet in depth

**Lifts outside of the limits above must be preapproved by an engineer.

Operation Rules

Pre-operational Test

At the start of each work shift, operators shall do the following steps before making lifts with any crane or hoist:

- Test the upper-limit switch. Slowly raise the unloaded hook block until the limit switch trips.
- Visually inspect the hook, load lines, trolley, and bridge as much as possible from the operator's station; in most instances, this will be the floor of the building.
- If provided, test the lower-limit switch.
- Test all direction and speed controls for both bridge and trolley travel.
- Test all bridge and trolley limit switches, where provided, if operation will bring the equipment in close proximity to the limit switches.
- Test the pendant emergency stop.
- Test the hoist brake to verify there is no drift without a load.
- If provided, test the bridge movement alarm.
- Lock out and tag for repair any crane or hoist that fails any of the above tests.

Moving a Load

- Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted. Inspect the drum to verify that the cable is in the grooves.
- Use a tag line when loads must traverse long distances or must otherwise be controlled. Manila rope may be used for tag lines.
- Plan and check the travel path to avoid personnel and obstructions.
- Lift the load only high enough to clear the tallest obstruction in the travel path.
- Start and stop slowly.
- Land the load when the move is finished. Choose a safe landing.
- *Never* leave suspended loads unattended. In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides. Lock open and tag the crane or hoist's main electrical disconnect switch.

Parking a Crane or Hoist

- Raise the hook at least 2.1 m (7 ft) above the floor.
- Store the pendant away from aisles and work areas or raise it at least 2.1 m (7 ft) above the floor.
- Place the emergency stop switch (or push button) in the OFF position.

Rigging

General Rigging Safety Requirements

Only select rigging equipment that is in good condition. All rigging equipment shall be inspected before each use; defective equipment is to be removed from service and destroyed to prevent inadvertent reuse. The load capacity limits shall be stamped or affixed to all rigging components.

Milestone policy requires a minimum safety factor of 5 to be maintained for wire rope slings. The following types of slings shall be rejected or destroyed:

Nylon slings with

- Abnormal wear.
- Torn stitching.
- Broken or cut fibers.
- Discoloration or deterioration.

Wire-rope slings with

- Kinking, crushing, bird-caging, or other distortions.
- Evidence of heat damage.
- Cracks, deformation, or worn end attachments.
- Six randomly broken wires in a single rope lay.
- Three broken wires in one strand of rope.
- Hooks opened more than 15% at the throat.
- Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.

Alloy steel chain slings with

- Cracked, bent, or elongated links or components.
- Cracked hooks.
- Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

Rigging a Load

Milestone must use qualified riggers during hoisting activities for assembly and disassembly work (1926.1404(r)(1)). Additionally, qualified riggers are required whenever workers are within the fall zone and hooking, unhooking, or guiding a load, or doing the initial connection of a load to a component or structure (1926.1425(c)).

- A qualified rigger is a person that:
 - possesses a recognized degree, certificate, or professional standing, or
 - has extensive knowledge, training, and experience, and
 - can successfully demonstrate the ability to solve problems related to rigging loads.
- The person designated as the qualified rigger must have the ability to properly rig the load for a particular job. It does not mean that a rigger must be qualified to do every type of rigging job.

When rigging a load:

- Determine the weight of the load. Do not guess.
- Determine the proper size for slings and components.
- Do not use manila rope for rigging.
- Make sure that shackle pins and shouldered eye bolts are installed in accordance with the manufacturer's recommendations.
- Make sure that ordinary (shoulderless) eye bolts are threaded in at least 1.5 times the bolt diameter.
- Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible.
- Pad sharp edges to protect slings. Remember that machinery foundations or angle-iron edges may not feel sharp to the touch but could cut into rigging when under several tons of load. Wood, tire rubber, or other pliable materials may be suitable for padding.
- Do not use slings, eye bolts, shackles, or hooks that have been cut, welded, or brazed.
- Install wire-rope clips with the base only on the live end and the U-bolt only on the dead end. Follow the manufacturer's recommendations for the spacing for each specific wire size.
- Determine the center of gravity and balance the load before moving it.
- Initially lift the load only a few inches to test the rigging and balance.

Crane Overloading

Cranes or hoists shall not be loaded beyond their rated capacity for normal operations. Any crane or hoist suspected of having been overloaded shall be removed from service by locking open and tagging the main disconnect switch. Additionally, overloaded cranes shall be inspected, repaired, load tested, and approved for use before being returned to service.

Working at Heights on Cranes or Hoists

Anyone conducting maintenance or repair on cranes or hoists at heights greater than 1.8 m (6 ft) shall use fall protection. Fall protection should also be considered for heights less than 1.8 m. Fall protection includes safety harnesses that are fitted with a lifeline and securely attached to a structural member of the crane or building or properly secured safety nets.

Use of a crane as a work platform should only be considered when conventional means of reaching an elevated worksite are hazardous or not possible. Workers shall not ride a moving bridge crane without an approval from the Safety Office, which shall specify the following as a minimum:

- Personnel shall not board any bridge crane unless the main disconnect switch is locked and tagged open.
- Personnel shall not use bridge cranes without a permanent platform (catwalk) as work platforms. Bridge catwalks shall have a permanent ladder access.
- Personnel shall ride seated on the floor of a permanent platform with approved safety handrails, wear safety harnesses attached to designated anchors, and be in clear view of the crane operator at all times.
- Operators shall lock and tag open the main (or power) disconnect switch on the bridge catwalk when the crane is parked.

Hand Signals

Signals to the operator shall be in accordance with the standard hand signals unless voice communications equipment (telephone, radio, or equivalent) is used. Signals shall be discernible or audible at all times. Some special operations may require addition to or modification of the basic signals. For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator and shall not be in conflict with the standard signals.

A signal person is required when:

- The point of operation is not in full view of the operator (1926.1419(a)).
- The operator's view is obstructed in the direction the equipment is traveling.
- Either the operator or the person handling the load determines that a signal person is needed because of site-specific safety concerns.
- The signal person is considered qualified if he or she:
 - Knows and understands the type of signals used at the worksite.
 - Is competent in using these signals.
 - Understands the operations and limitations of the equipment, including the crane dynamics involved in swinging, raising, lowering and stopping loads and in boom deflection from hoisting loads.
 - Knows and understands the relevant signal person qualification requirements specified in subpart CC (1926.1419-1926.1422; 1926.1428).
 - Passes an oral or written test and a practical test. – Qualification training records must be available onsite.

Inspection, Maintenance, and Testing

All tests, maintenance, and inspections shall be conducted in accordance with the manufacturer's recommendations, by properly trained personnel.

Monthly Tests and Inspections

- All in-service cranes and hoists shall be inspected monthly and the results documented.
- Defective cranes and hoists shall be locked and tagged "out of service" until all defects are corrected. The inspector shall initiate corrective action by notifying the Equipment Department.

Annual Inspections

The Equipment Department shall schedule and supervise (or perform) annual preventive maintenance (PM) and annual inspections of all cranes and hoists. The annual PM and inspection shall cover:

- Hoisting and lowering mechanisms.
- Trolley travel or monorail travel.
- Bridge travel.
- Limit switches and locking and safety devices.
- Structural members.
- Bolts or rivets.
- Sheaves and drums.
- Parts such as pins, bearings, shafts, gears, rollers, locking devices, and clamping devices.
- Brake system parts, linings, pawls, and ratchets.
- Load, wind, and other indicators over their full range.
- Gasoline, diesel, electric, or other power plants.
- Chain-drive sprockets.
- Crane and hoist hooks.
- Electrical apparatus such as controller contactors, limit switches, and push button stations.
- Wire rope.
- Hoist chains.

Load Testing

- New cranes and hoists shall be load tested at 125% of the rated capacity by designated personnel.
- Slings shall have appropriate test data when purchased. It is the responsibility of the purchaser to ensure that the appropriate test data are obtained and maintained.
- Re-rated cranes and hoists shall be load tested to 125% of the new capacity if the new rating is greater than the previous rated capacity.
- Cranes or hoists that have had major modifications or repair shall be load tested to 125% of the rated capacity.

- Cranes and hoists that have been overloaded shall be inspected prior to being returned to service.
- All cranes and hoists with a capacity greater than 2722 kg (3 tons) should be load tested every four years to 125% of the rated capacity. Cranes and hoists with a lesser capacity should be load tested every eight years to 125% of the rated capacity.
- All mobile hoists shall be load tested at intervals to be determined by the Maintenance Dept.

Records

The Human Resources Department shall maintain the union verification that operators are certified and/or competent per their training requirements.

The Equipment Department shall maintain records for all cranes, hoist and rigging equipment.

Hazard Communications/Global Harmonization System

The Milestone Hazard Communication Program is designed to provide the employee with information about hazards in the workplace, chemicals that employees work with, and safety information to protect the employee. This program also describes the Global Harmonization of Safety Data Sheets and information. The employee is granted this Right-To-Know information by OSHA and Milestone has a moral obligation to provide such information to the employee for their own safety and health.

The responsibility for the Hazard Communication Program rests with the Supervisors to seek compliance with the Hazcom Standard. However, all levels of employees, supervisors, and management have a role in such hazard communication. Management and the Safety Department must review products and Safety Data Sheets of chemicals that are in use or considered for use by the employees. Milestone Management must label containers of chemicals and products and keep the SDS book current. Supervisors shall be observant of the products that are being used and remind employees of the hazards. All employees share the responsibility to look up and use the information that the Hazcom Program makes available to them.

Company Policy

It shall be the policy of Milestone Contractor's to inform its employees of all hazards in their workplace including offices, shops, plants and project work sites. This written hazard communication program is the formal guidelines for the implementation of the company policy as well as compliance with the OSHA Hazard Communication Standard cited at 29 CFR 1910.1200 and 1926.59.

- No employee shall be forced to work where hazards exist or are perceived to exist and where such hazards have not been communicated to the employee and the employee trained and protected from those hazards.
- Inform all contractors and subcontractors working at or for Milestone of our Hazard Communication Program, to provide them a copy of our Hazard Communication Program upon request, and to inform them and provide briefings of the hazards and protection required prior to their commencing work.
- Milestone wants its employees to clearly understand how exposure to chemicals may present risks to their health, how they may be exposed, and how to prevent or minimize the potential for such exposure.

Scope and Application

- The Milestone Contractors' Hazard Communication Program applies to all employees, temporary employees, contractors and their subcontractors, and visitors on an extended stay. This written program shall be a part of the Employee Safety Procedures manual and a part of the Corporate Health and Safety Program Manual.
- Under this program, employees and others will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals that are used in Milestone's work, safe handling procedures, and measures to take to protect employees from these chemicals. Employees shall also be informed of non-routine or hazardous tasks and safe work procedures to minimize risk and exposure to those hazardous tasks.

Location of Written Program

- This written Hazard Communication Program shall be found in and made a part of the Milestone Safety Handbook.

- A master copy of this document shall be kept electronically and accessible at all Milestone facilities.

Annual Review

This program will be reviewed by Milestone management on an annual basis to ensure continuing compliance and will be revised accordingly. Such review shall be coordinated by the Milestone Safety Department. All employees are encouraged to submit suggestions for revision or addition at any time.

Hazardous Material Inventory

Milestone Managers shall conduct an annual inventory of all materials used, stored, or transported on project jobsites, plants or facilities, that are known to fall under the OSHA Physical or Health Hazard Classifications.

- This inventory will be updated as materials are introduced into or removed from usage.
- Such inventory list modifications shall be sent to the Milestone Safety Department who will maintain the master listing with the Master Copy of this written program.
- The Environmental Protection Agency has defined hazardous materials into four broad categories: ignitable, corrosive, reactive, and toxins or poisons. Each category is defined by certain characteristics or physical properties.
 - Ignitable-In general, these can be thought of as materials that can burn readily under normal conditions. Some materials, that are very easily ignited, are called flammable. Some are so volatile they can flash explosively when ignited. Other materials which require more heat or effort to ignite are called combustible. Oxidizers are a special class of chemicals that react very rapidly and strongly with other chemicals and may generate enough heat to start a fire.
 - Corrosives-These are materials that corrode or "eat away" another material. Acids or caustics are good examples. These materials may be very damaging to skin when direct contact is made. They may also be very irritating to the eyes, nose, throat, and lungs if the vapors or mists are inhaled.
 - Reactive-These materials are unstable under normal conditions. Contact with water or air may cause the material to react violently or explosively, or it may generate toxic gases, vapors, or fumes when exposed to pH conditions between 2 and 12.5.
 - Toxins-These materials are poisons which may be harmful or fatal if contacted, ingested or inhaled. Effects of the poisons may vary with the concentration of the poison, time of exposure, or potency of the material. Effects may include problems with the central nervous system, cardio-pulmonary system, gastro-intestinal system, skin, or even death, if precautions are not observed.

Although these materials can be dangerous, they can be handled safely if protective and preventive procedures are followed.

Hazard Determination Procedures

- Milestone is required to evaluate chemicals that are used in the workplace to determine if they are hazardous. Milestone may conduct their own tests or rely on the information supplied by the chemical manufacturers and distributors.
- If a chemical is listed in any of the following sources, it shall be considered hazardous:
 - A. 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration (OSHA); or
 - B. Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, American Conference of Governmental Industrial Hygienists (ACGIH) latest edition; or
 - C. National Toxicology Program (NTP), Annual Report on Carcinogens (latest edition); or
 - D. International Agency for Research on Cancer (IARC) Monographs (latest Edition).
- If a chemical mixture contains greater than one percent by volume or weight of a hazardous substance listed in the list above, then the mixture shall be considered hazardous.
- If a chemical mixture contains greater than .1 percent of a substance that is considered a carcinogen from a list in "C" or "D" above shall be considered hazardous.
- Milestone has chosen to accept the information supplied by manufacturers and distributors concerning chemical hazards as a reliable and accurate determination of health or physical hazards.

Container Labels and Other Forms Of Warning

Milestone Contractor's shall ensure that all hazardous chemicals stored, brought into, or leaving the offices, plants, job sites or shops, are properly labeled and updated, as necessary. Likewise, Project

Supervisors shall ensure that hazardous chemicals stored, brought onto, or leave a project site are properly labeled and updated as necessary.

- Labels, tags, or other markings must contain the following information:
 - Identity of the Hazardous Chemical
 - Appropriate Hazard Warnings, Signal Words and Pictograms as designated by the Global Harmonization System.
 - Name and address of the chemical manufacturer, importer, or other responsible party
- Existing labels on incoming containers shall not be removed or defaced unless an alternate label with the required information immediately replaced the existing label. Existing labels need not be replaced if the information required is already conveyed by other means. Labels on containers must reference the chemical by chemical name or trade name, or by a code referenced to a Safety Data Sheet file. Labels must be legible, in English, and prominently displayed. Labels shall not conflict with markings and labels required by the Department of Transportation under the Hazardous Materials Transportation Act.
- Employees responsible for receipt of deliveries will refuse to accept shipments of known hazardous materials unless the containers are correctly labeled.
- Employees who transfer these materials to other containers shall ensure that:
 - The container is suitable for the material,
 - The container is clean and dry, and
 - The container is properly labeled, also.

NOTE: Containers used for the immediate use during an employee's shift do not have to be labeled. They should have, at least, the chemical name labeled. In no event shall unlabeled containers be left when an employee completes his work shift or departs the immediate work area.
- For various reasons, the standard labels used may not be practical (tanks too large, containers too small, inaccessible, etc.). In those cases, alternate warnings such as placards, process sheets, operating materials, or other written materials may be used provided that they convey the identity of the chemical and the appropriate hazard warnings.
- Labels on incoming containers should be periodically reviewed and updated by the manufacturer or distributor. However, it is also the responsibility of The Safety Department for proper in-house or shipping warning labels to verify the labels are correct and reflect the information on the most current Safety Data Sheet.
- The review and verification process will be as follows:
 1. New Safety Data Sheets shall be required at least once a year.
 2. Upon receipt of the new SDS, Milestone Safety shall review the SDS and the information currently being displayed on the labels.
 - If the label information and the SDS information agree no changes to labels or relabeling needs to take place. The SDS will then be entered into the SDS files.
 - If the label and SDS information are different, the Safety Department will verify the SDS information and affix a new label communicating that information. The Safety Department shall contact the manufacturer or supplier, inform them of the discrepancy and request that label information be updated.
 - In-house labeling system shall be a system based on the National Fire Protection Association NFPA 704 Standard system or the National Paint and Coatings Association. Hazardous Materials Identification System (NPCA). In-house labeling shall be done where there is no existing warning label, the label is defaced or illegible, the label is inadequate or unclear, or if the contents are transferred to another container. These labels provide spaces for identifying the material in the container and indices for health, flammability, and reactivity. The NFPA system also has space for identifying special hazards while the NPCA system has space for specified personal protection. In addition to the labeling, wall posters explaining the hazard codes are displayed in the work area bulletin boards and pocket guides or other means are individually distributed to employees during training.
 - For materials that are not labeled or where Milestone must supply a label, the Safety Department shall prepare and code the HMIS labels. The primary reference for coding will be the Safety Data

Sheet for the material. The hazard index ratings for the HMIS (Hazardous Material Identification System) labels shall be:

Health (dark blue background)

- (0) Minimal - no hazard. Exposure to the substance offers no significant risk to health.
- (1) Slight - irritation or minor injury would result from exposure to this substance. Protective measures are indicated.
- (2) Moderate - dangerous exposure to this substance would be hazardous to health. Protective measures are indicated.
- (3) Serious - extreme danger and injury would result from exposure to this substance. Do not expose any body surface to these materials. Full protective measures should be taken.
- (4) Severe - deadly, even the slightest exposure to this substance would be life threatening. Only special protective clothing for these materials should be worn.

Flammability (red background)

- (0) Minimal - substance will not burn.
- (1) Slight - flash point above 200°F. Substance must be preheated to ignite. Most combustible solids fit this category.
- (2) Moderate - flash point below 200°F. Moderately heated conditions may ignite this substance. Caution procedures should be employed in handling.
- (3) Serious - flash point below 100°F. Flammable, volatile, or explosive under almost all normal temperature conditions. Exercise great caution in storage or handling of these materials.
- (4) Severe - flash point below 75°F. Substance is very flammable, volatile, or explosive depending on its state. Extreme caution must be used in handling or storage of these materials.

Reactivity (yellow background)

- (0) Minimal - stable, substance will remain stable when exposed to heat, pressure, or water.
- (1) Slight - normally stable substances that may become unstable at elevated temperatures and pressures or mixed with water - approach with caution.
- (2) Moderate - unstable, violent chemical changes are possible at normal or elevated pressures and temperatures. Potentially violent or explosive reaction may occur when mixed with water. Monitor from a safe distance.
- (3) Serious - explosive. Substance readily capable of detonation or explosion by a strong irritating source, such as heat, shock, or water. Monitor from behind explosion resistant barriers.
- (4) Severe - substance readily capable of detonation or explosion at normal temperatures and pressures. Evacuate area if exposed to heat or fire.

Target Organ Effects (light blue background) (This category does not appear on all HMIS labels).

- (0) Minimal - slight irritant. Protection for eyes, skin, upper respiratory organs required.
- (1) Slight - irritating vapor and fumes in contact with skin, eyes and mucous membranes. Use SCBA.
- (2) Moderate - toxic. Irritant to nasal passages, skin, lungs, kidneys, liver, and/or respiratory system. Use SCBA.
- (3) Serious - highly toxic and irritating to mucous membranes, lungs, eyes, skin, and digestive system. Full protective equipment required. No skin surface should be exposed.
- (4) Severe - Caustic and corrosive effect on organic tissues. Toxic effect on blood, liver, kidneys, and nervous system. Special protective clothing required against specific hazard. No skin surface should be exposed.

Specific Hazards (white background) (NFPA System)

OXY	Oxidizer
ACID	Acid
ALK	Alkali
COR	Corrosive
W	Use No Water
	Radioactive Radiation Hazard

PPE (NPCA System) (specified)

Examples of the NFPA and NPCA Hazardous Materials Identification System labels.

Safety Data Sheets

- The Safety Department and the Purchaser will be responsible for ensuring that a current Safety Data Sheet is obtained for each chemical or material used.
- The Safety Department shall receive all SDSs and after verifying the labeling requirements and the chemical inventory listing, place the SDS in file.
- Safety Data Sheets shall be obtained or produced in English language containing the following information:
 - Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
 - Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.
 - Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.
 - Section 4, First-aid measures includes important symptoms/ effects, acute, delayed; required treatment.
 - Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.
 - Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.
 - Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.
 - Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).
 - Section 9, Physical and chemical properties lists the chemical's characteristics.
 - Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.
 - Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
 - Section 12, Ecological information*
 - Section 13, Disposal considerations*
 - Section 14, Transport information*
 - Section 15, Regulatory information*
 - Section 16, Other information, includes the date of preparation or last revision.
- SDS Sheets are accessible online by Supervision and employees have access as required.
- The purchaser shall be responsible for acquiring and forwarding SDS sheets to the safety department as chemicals change or are updated.
- Employees have a right to access the Safety Data Sheets in their work areas during their work shifts. When employees cannot access the SDS's, the problem should be reported to The Safety Department who will resolve the problem.

Employee Information and Training Program

- As part of the employee's orientation program, all new employees shall be informed of the hazard communication program, the location of the program and the Safety Data Sheet book or binder, and how to use the SDSs with the hazard labeling system.
- Employees' rights as guaranteed under state and federal laws.
- The obligations of their employer under state and federal hazard communication laws.
- Proper use and handling of hazardous substances to which they may be exposed.
- How to read and use a Safety Data Sheet.
- How to access the Safety Data Sheets in their work area and request a copy if so desired.
- The location of the written hazard communication program.
- Methods and observations that may be used to detect the presence of release of a hazardous material in their work area. (Training may include the use of monitoring devices, visual appearance, odors, other early warning properties of the chemicals, etc.)
- The known or suspected health hazards associated with chemicals found in the workplace.
- Proper personal protection practices and equipment to minimize or prevent exposure.
- Explanation of the labeling system used at the facility and how to read labels.

- Location of emergency and first aid equipment and their use and procedures to follow for spills, releases, fires, and medical emergencies.
- Procedures for employees, their representatives, or medical personnel to obtain SDS information, medical surveillance information, and exposure records.
- Basic toxicology and routes of entry into the body systems.
- Physical hazards such as noise, vibration, and temperature stress.
- Biological and radiological hazard.

Dangerous Work Tasks including confined space entry, lot work, excavations, pipeline breaking, building demolitions, work on potentially energized equipment, and/or sampling.

- Employees that are being transferred to another job site shall be informed of all known hazards in that workplace when they are first assigned to that new work.
- A review of the hazard communication program will be conducted annually as part of the employee's refresher training program.
- All training including hazard communication should be documented as required by the Milestone Training Program and Training Records found in the Corporate Health and Safety Program Manual.
- When a new hazardous material is to be introduced to a work area, the supervisor for that area will obtain health and safety information prior to its being brought on site and will instruct the employees prior to its introduction. The supervisor will document the training as required.
- In the event employees are assigned to a non-routine task which may involve exposure to a hazardous material, the supervisor in charge shall obtain basic hazard information about each substance to which the employees will be exposed and brief them on safety precautions and procedures. The supervisor will also inform the employees of the location of the Safety Data Sheets for the substance in that work area. Employees should consult these references as necessary.
- Whenever a new or non-routine task or procedure is introduced into the workplace or project site, the Project Superintendent or supervisor (if trained) shall obtain all pertinent information, instructions from manufacturer or technician, task safety analysis, etc. and relay such information and training to the employees assigned such task or procedure. Such additional training must take place and be documented prior to employees performing such task.

Employee Exposure to Chemicals

- Employees and supervisors are to report all exposures to chemicals and substances that are encountered.
- In the event of a medical emergency, the attending health professional will have full and immediate access to the identity of the hazardous chemicals to which an employee may have been exposed if they believe the information is necessary for treatment.
- In non-emergency situations, the health professional providing medical or occupational health services to an exposed employee must request in writing the specific information they need and a reasonably detailed documentation of need. Within 10 days of receipt of the request, the Milestone Safety Department will either provide the necessary information or request further clarification of need. If trade secrets are involved statements of confidentiality may also be required from the requestor.
- The Milestone Human Resources Representative shall retain individual medical records and employee exposure records in accordance with 29 CR 1910.20. Medical Records for employees are maintained for the duration of employment plus the time specified in the regulations (currently 30 years).

Emergency Response

- In the event of an emergency, the Milestone Safety Representative will ensure that personnel involved in containment and clean-up of materials, those responsible for public safety, and public emergency responders will be given all available health and safety information. A Crisis Management Plan, as found in the Milestone Safety Handbook, shall be used as the guidelines for handling such emergencies.

Outside Contractors and Subcontractors

- Outside contractors shall be informed as to the hazardous materials and processes to which they may be exposed while performing their work on the premises.
- Outside contractors will conduct, with Milestone personnel, formal training in accordance with this Hazard Communication Program in a briefing session prior to the contractors commencing work at

the Milestone location or project work site. A record to document such training shall be required and placed in the job file.

- Contractors shall be informed as to the location of hazards, proper PPE to be used, and the location of emergency equipment. Additionally, contractors shall be informed of the location of the SDS book or binder and how to access such SDS information.
- Any and all contractors and subcontractors bringing or having delivered chemicals onto the Milestone site shall be required to furnish to Milestone copies of a SDS for every chemical brought onto the site. Such SDS shall be transmitted to the Construction Supervisor prior to or immediately after the shipment being received.