

Birmingham Toledo Inc.

Health and Safety Policy Statement

We are committed to comply with all applicable safety and health legal requirements. We are committed to our guiding principles which include ensuring that Safety, Health and Environment is First – never compromise on the health and safety of our customers or our employees and to manage responsibly the impact that our business has on the environment.

Birmingham Toledo's employees including president, management, safety manager, service managers, technicians and office staff are committed to ensuring that each employee and each individual that we come in contact with during our daily activities returns home each day safe.

Environmental Policy Statement

BTI recognizes that environmental concerns are of critical importance. BTI encourages its employees to join with the company in full acceptance of and compliance with this policy. We will create procedures that fully comply with federal, state and local regulations. We will provide adequate training to our employees to ensure our workers are aware of these procedures and are capable of following them.

Protection of the Environment

We will employ practical measures to protect the environment. We will conserve and protect the water, air, and land resources we use. We will strive to eliminate any releases to land, air or water that may harm human health or the environment. Continuous improvement in our environmental performance will be a principal objective.

Waste Management Policy Statement

We will work to prevent waste and pollution at the source whenever possible. New facilities and improvements of existing operations will use processes designed to minimize the environmental effects of our operations and will incorporate functional pollution control equipment.

Recycling and Waste Disposal

We will support recycling programs where practical and will use environmentally safe treatment and disposal practices for waste that is not eliminated at the source or recycled.

Compliance

We will manage facilities so that we meet or exceed legal requirements and we will implement programs and procedures to satisfy compliance.

Disclosure

We will inform our employees of our progress in environmental issues. We will cooperate with the authorities and regulatory agencies in responding to inquiries. We will encourage our employees to report to the Company conditions that they reasonably believe could be harmful to the environment or pose health or safety hazards so the Company can initiate prompt corrective actions.

Commitment

Management will consider the environmental and cultural implications of its decisions.

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GENERAL SAFETY – HEALTH PROVISION				Revision No.	0
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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of BTI facilities as related to the indicated general safety requirements that apply.

This program applies to all employees of BTI, temporary employees and any contractors working for BTI. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

BTI Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the General Safety Requirements program. These procedures are kept in the designated safety manager's office.

Service/Office Manager

- Responsible for the implementation and maintenance of the plan for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace General Safety Requirements program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.
- Shall use the safeguards, safety appliances and personal protective equipment while following all safe work practices and procedures for the workplace.

Competency and Training

Workers shall be competent to operate equipment and perform job tasks. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. All workers must be trained in procedures until they are competent. BTI shall permit only qualified by training or experience workers to operate equipment and machinery.

BTI shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

Inspections

BTI shall ensure that frequent and regular inspections of the workplace, jobsites, materials, equipment and of work processes and procedures by a competent person to identify any risk to the safety or health of any person at the workplace.

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BTI shall ensure that every dangerous occurrence is investigated as soon as is reasonably possible.

BTI must ensure that if a risk is identified we will correct any unsafe condition as soon as is reasonably practicable and, in the interim, take immediate steps to protect the safety and health of any person who may be at risk.

General Facility Requirements

Housekeeping

Each work site shall be kept clean and free from materials or equipment that could cause workers to slip or trip. A floor or other surface used by any worker shall be kept free of obstructions, hazards and accumulations of refuse.

Safe Equipment Maintenance

BTI has a duty to ensure our work environments, as far as is reasonably practicable, ensure the health, safety and welfare at work of the workers.

We must and shall ensure that all equipment is maintained to ensure the safe functioning of the equipment. Damaged and faulty equipment reporting procedures must be in place.

Where a defect is found in equipment BTI will ensure that steps are taken immediately to protect the health and safety of any worker who may be at risk until the defect is corrected and the defect is corrected by a competent person as soon as is reasonably practicable. The machine, tool, material or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

BTI prohibits and will not require or permit compressed air to be directed towards a worker for the purpose of cleaning clothing or personal protective equipment used by that worker, or for any other purpose if the use of compressed air may cause dispersion into the air of contaminants that may be harmful to workers.

Impairment

No person shall enter or remain at any workplace of employment while the person's behaviour or ability to work is affected by alcohol, intoxicating beverages, drugs or other substance.

Improper Conduct

All workers shall engage in proper behaviour. Improper behaviour that might create or constitute a hazard to any person is not acceptable. Improper activity or behaviour includes horseplay, scuffling, fighting, and practical jokes.

Industrial Hygiene

A worker who may be exposed to a chemical or physical agent that may endanger the worker's safety or health shall be trained to use the precautions and procedures to be followed in the handling, use and storage of the agent, in the proper use and care of required personal protective equipment, and in the proper use of emergency measures and procedures including the location of eyewash stations.

Sect. 1.1	Birmingham Toledo Inc Safety Management System			Doc No:	SWA
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Purpose

The Stop Work Authority process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission or lack of understanding that could result in an undesirable event. All BTI employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health, safety or environmental risks exist.

Key Responsibilities

- All employees are responsible and authorized to initiate a Stop Work Intervention when warranted or when the control of the HSE risk is not clearly established or understood and management is responsible to create a culture where SWA is exercised freely.
- Supervisors are responsible to ensure a culture is created where SWA is exercised and honored freely to resolve issues before operations resume and recognize proactive participation.
- Management must establish and support clear expectations to exercise SWA, create a culture where SWA is exercised freely and hold those accountable that chose not to comply with established SWA policies.

Stop Work Authority Procedure

- When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervision of the stop work issue, correct the issue and resume work when safe to do so.
- No work will resume until all stop work issues and concerns have been adequately addressed.
- All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.
- Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated by the host nor by BTI.

Follow-Up

- It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.
- BTI stresses the importance of follow-up after a Stop Work Intervention has been initiated and closed as this should be used as a learning tool for future actions and because of this all Stop Work reports will be reviewed by a supervisor/manager and corrective measures to be put into place.

Training

Employees shall receive Stop Work Authority training before their initial assignment. The training will be documented including the employee name, the dates of training and subject matter.

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Purpose

This program covers BTI policy related to Ammonia hazards in the workplace. The intent of this program is to provide BTI employees with general knowledge and guidelines enabling employees to anticipate, recognize, evaluate, and better participate in controlling their exposure to Ammonia found in certain industrial worksites and processing facilities in which BTI employees may perform work.

Scope

This Ammonia Hazard Awareness Program and Policy is intended for support of, and use by company operations both in business units and project operations.

Overview

All employees of BTI affected or potentially affected by the ammonia refrigeration process are made aware of the Process Safety Management (PSM) Program being implemented. BTI has, and will continue to develop this written plan of action regarding the implementation of the employee participation required and consult with employees on the conduct and development of process hazard analyses and on the development of other elements of the standard.

Policy

Stop the Work Immediately - Upon discovery or suspicion of Ammonia being present on a jobsite, BTI employees are to stop the work immediately and inform their supervisor.

Avoid Exposure – It is BTI policy to train employees with general knowledge and guidelines enabling them to protect themselves and others from unnecessary Ammonia exposure.

Hazard Identification & Control – All employees assigned to job-sites where exposure to Ammonia may be possible shall participate in the identification, evaluation and control of Ammonia hazards. All employees shall be familiar with the local Emergency Action Plan and specific contingency plans involving Ammonia.

Responsibilities

Management

BTI Management is responsible for the following:

Ensure that the HSE Management System includes an Ammonia policy and that the policy is reviewed annually and revised as necessary to reflect the most recent exposure monitoring data.

Provide Ammonia Hazard Awareness Training for all employees assigned to at-risk areas.

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Provide leadership and support for employees in communicating their responsibility to stop the work when Ammonia hazards are discovered or suspected.

Provide resources to address and correct any Ammonia related events that arise.

Determine when medical surveillance is required.

Ensure that confirmed employee exposures are adequately documented.

Supervision

BTI Supervision is responsible for the following:

Understand and enforce the BTI Ammonia Policy

Implement site controls isolating employees from Ammonia hazards when Ammonia is discovered or suspected on a jobsite.

Immediately inform management of any Ammonia exposures on a jobsite.

Provide immediate on-the-spot training in recognition and control of Ammonia hazards for all employees assigned to at-risk locations, enabling employees to protect themselves and others from unnecessary Ammonia exposure.

Contact a competent individual when Ammonia is discovered on a jobsite.

Employees

BTI Employees are responsible for the following:

Upon discovery of Ammonia being present on a jobsite, BTI employees are to stop the work and immediately inform their supervisor.

Protect themselves and others from unnecessary Ammonia exposure by wearing appropriate PPE and following safety rules and guidelines regarding Ammonia hazard protection.

Immediately report to a supervisor any changes, deficiency or breaches in site controls established to isolate employees from Ammonia hazards on a jobsite.

Participate in and understand Ammonia Awareness training.

Participate in JSA and hazard recognition activities. Make every effort to identify Ammonia hazards during daily JSA's.

What is Ammonia?

Ammonia is a colorless gas under normal conditions. It can be a liquid under pressure. It has a pungent, suffocating odor. Anhydrous Ammonia is attracted to water and at ambient temperature is mainly a gas.

Ammonia exposure can occur from the following:

Working on or near industrial refrigeration machinery rooms, equipment and/or piping

Working in petroleum refineries

Working with or near agricultural fertilizer

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Hazard Recognition

High concentrations of ammonia gas, liquid ammonia and solutions of ammonia can cause harm if inhaled or contacts eyes or skin.

Exposure of the eyes to ammonia may cause burning, tearing, temporary blindness and severe eye damage.

Exposure of the skin to ammonia may cause severe burns and blistering.

Exposure of the respiratory tract (mouth, nose and throat) to ammonia may cause runny nose, coughing, chest pain, severe breathing difficulties, severe burns and death.

Ammonia is the second most widely used chemical in industry and can be found in most dyes, fibers and plastics, explosives, polymers, and for gold extraction from ore.

Ammonia is a colorless gas with pungent odor that has a suffocating effect when inhaled.

Ammonia poses the following health hazards:

Inhalation of ammonia is very toxic and can cause severe respiratory damage and death. Can cause life-threatening accumulation of fluid in the lungs. Symptoms may develop hours after exposure and be long-term.

Ammonia is corrosive and can irritate the skin, permanently damaging or scarring can result. Direct contact with the liquefied gas can freeze the skin and cause tissue damage, infection, and blistering.

The corrosive nature of ammonia can cause severe eye damage and blindness.

First aid measures

Inhalation: Take precautions to ensure your own safety before attempting rescue (e.g. wear appropriate protective equipment). Move victim to fresh air. If breathing is difficult, trained personnel should administer emergency oxygen. DO NOT allow victim to move about unnecessarily. Symptoms of pulmonary edema may be delayed. Immediately call a Poison Centre or doctor. Treatment is urgently required. Transport to a hospital.

Skin Contact:

Gas: flush with lukewarm, gently flowing water for 5 minutes. If irritation or pain persists, see a doctor.

Liquefied gas: quickly remove victim from source of contamination. DO NOT attempt to rewarm the affected area on site. DO NOT rub area or apply direct heat. Gently remove clothing or jewelry that may restrict circulation. Carefully cut around clothing that sticks to the skin and remove the rest of the garment. Loosely cover the affected area with a sterile dressing. DO NOT allow victim to drink alcohol or smoke. Immediately call a Poison Centre or doctor. Treatment is urgently required. Transport to a hospital.

Eye Contact:

Gas: immediately flush the contaminated eye(s) with lukewarm, gently flowing water for 5 minutes, while holding the eyelid(s) open. If irritation or pain persists, see a doctor.

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Liquefied gas: move victim to fresh air. Immediately and briefly flush with lukewarm, gently flowing water. DO NOT attempt to rewarm. Cover both eyes with a sterile dressing. DO NOT allow victim to drink alcohol or smoke.

Ingestion: Not applicable (gas).

Some of the first aid procedures recommended here require advanced first aid training.

Stability and flammability

Ammonia is a flammable gas and high concentrations pose a significant explosion hazard especially in a confined space.

Extinguishing media can be carbon dioxide, dry chemical powder, appropriate foam, water spray, or fog.

Normally stable except when exposed to strong acids, peroxides, and chlorines

PPE

Wear chemical safety goggles or a full face shield with safety goggles

Chemical protective gloves, apron, and boots

NIOSH approved Self-Contained Breathing Apparatus (SCBA) must be carried when working on ammonia storage containers and transfer equipment.

Controls –Protection

Employees will be provided with and required to use impervious clothing, gloves, face shields and other appropriate protective clothing necessary to prevent any possibility of skin contact with liquid anhydrous ammonia or aqueous solutions of ammonia containing more than 10% by weight of ammonia. Similar precautions should be taken to prevent the skin from becoming frozen from contact with vessels containing liquid anhydrous ammonia.

Employees should be aware of clients' contingency plans and provisions.

Employees must be informed where ammonia is used in the host facility and aware of additional plant safety rules.

Training

Training will be provided on the health hazards and any use/handling requirements for Ammonia at time of initial assignment and annually.

Ammonia storage is common throughout the agricultural industry. Technicians will find themselves working in close proximity to large ammonia storage tanks that contain hazardous amounts of ammonia. BTI employees are subject to exposure from the following sources:

Fertilizer manufacturers and resale operations

Food processors where refrigeration is used

Chemical manufacturers

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Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of BTI vehicles.

This program applies to all employees of BTI, temporary employees and any contractors working for BTI. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

BTI Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the General Driving Safety Requirements program.

Service/Office Manager

- Responsible for the implementation and maintenance of the plan for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local General Driving Safety Requirements program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.

Driving Safety

Only authorized employees shall drive a BTI motor vehicles and shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.

All vehicles must be of the correct size and designed for the intended use. The vehicle shall be used for its purpose. Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

BTI requires drivers and passengers are to wear seat belts anytime the vehicle is in motion.

BTI employees are to ensure loads are within the manufacturer's legal limits and ensure Load security.

Employees driving vehicles are required to:

- Obey all local driving laws or regulations as well as requirements of clients;
- Immediately report any citation, warning, vehicle damage or near miss associated with company or client vehicle operation to the supervisor;
- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by occupants during the operation of any vehicle.
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that may approach them;
- When speaking with a passenger, always keep your eyes on the road;
- Both hands on the wheel;

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- The use of cell phones, radios or other electronic devices while driving any vehicle should only be performed when it can be done in a safe manor, or when site rules prohibit use.
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving;
- Drive for conditions, not just the speed limit;
- Alcohol or illegal drugs are not allowed to be in a company, client or leased vehicle at any time and all vehicles are subject to random inspections.

Drivers are to be prepared before leaving:

- Perform 360 walk around – report new damage;
- Check windshield for cracks that could interfere with vision;
- Inspect for vehicle damage and immediately report any damage to the supervisor if not previously observed;
- Check fuel level to be certain the destination can be reached;
- Check to ensure the license plates and inspection tag on vehicle are current;
- Ensure that there is a first aid kit and inspected fire extinguisher in the company vehicle; if equipped.
- Ensure driver is rested and alert for driving;
- Secure all loads;
- Employees are not to perform repairs or maintenance other than routine fluid additions unless qualified.
- Assess the risk of a journey before driving and plan their driving route based on a journey risk assessment.

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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

This program is written to provide directives to managers, supervisors, and employees about their responsibilities in the heat/Cold related illness prevention program.

This program applies to all employees of BTI, temporary employees and any contractors working for BTI. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Working in extreme temperatures (hot or cold) can overwhelm the body's internal temperature control system. When the body is unable to warm or cool itself, heat or cold related stress can result. Heat and cold stress can contribute to adverse health effects which range in severity from discomfort to death.

BTI has developed this Heat /Cold Stress Program to minimize the effects of heat and cold stress on employees. This program contains the procedures and practices for safely working in temperature extremes.

Responsibilities

BTI Management

- Provide monitoring (upon request) and assist employees with the development of procedures to minimize the adverse effects of heat and cold stress in the workplace.
- Provide training to employees affected by heat and cold.

Supervisors

- Review and comply with the provisions outlined in this program
- Ensure all employees are properly trained before working in extreme temperature conditions.
- Assess the day-to-day heat or cold stresses on employees.
- Assess employees work load and assigning work and rest schedules as needed.
- Supervisors must ensure personal factors that contribute to heat related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal factors that can contribute to heat/Cold related illness are age, weight/fitness, drug/alcohol use, prior heat/Cold-related illness, etc.
- Ensure all employees have the appropriate personal protective equipment (PPE) prior to working in extreme temperature conditions.
- Regular inspections on cold weather supplies (e.g. hand warmers, jackets, shovels, etc) should be carried out to ensure that supplies are always in stock.
- Ensure employees are familiar with this safety program.

Employees

- Review and comply with the provisions outlined in this program.
- Complete training before working in extreme temperature conditions.

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- Wear the appropriate PPE.
- Report heat and cold stress concerns to their supervisor.

Heat Related Signs and Symptoms, Treatment and Prevention

Physical factors that can contribute to heat related illness shall be taken into consideration before performing a task. The most common physical factors that can contribute to heat related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability.

While working in hot weather conditions, the human body may not be able to maintain a normal temperature just by sweating. If this happens, heat-related illnesses may occur.

The most common health problems caused by hot work environments include:

Heat stroke –This is the most serious heat related effect. Heat stroke occurs when the body temperature increases above 104F. Signs and symptoms of heat stroke are confusion, loss of consciousness and lack of perspiration. This condition must be treated as a medical emergency and the employee must receive immediate medical attention.

Heat exhaustion–Signs and symptoms of heat exhaustion include headache, nausea, dizziness, weakness, irritability, confusion, thirst, heavy perspiration and a body temperature greater than 100.4 F. Employees experiencing heat exhaustion should be moved to a cool area, given fluids to drink and given cold compresses for their head, face and neck. Employees should also be taken to a clinic or emergency room to be monitored by medical personnel.

Heat cramps–Signs and symptoms of heat cramps include muscle pains usually caused by the loss of body salts/fluids. Employees Body salts and fluids. Employees should replace fluid loss by drinking water and/or carbohydrate - electrolyte replacement liquids (e.g. Gatorade) every 15 to 20 minutes.

Heat rash–Heat rash is caused by excessive perspiration and looks like a red cluster of pimples or small blisters. Heat rash usually appears on the neck, upper chest, in the groin, under the breasts and in elbow creases. Treatment for heat rash is to provide a cooler, less humid environment.

Dehydration–Dehydration is a major factor in most heat disorders. Signs and symptoms of dehydration include increasing thirst, dry mouth, weakness or light -headedness (particularly if worse upon standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks.

While heat related illness are dangerous and potentially life threatening, they can be prevented.

Prevention methods Include:

Acclimation–Acclimation is a process by which the physical processes of an employee's body adjusts to the environment over a period of time. Based on data obtained from OSHA, this process usually takes five to seven days. This process could take up to three weeks depending on the individual and their work environment. According to the American Industrial

Engineering Controls–For employees working indoors, the best way to prevent heat-related illness is to make the work environment cooler. Where and if possible, use air conditioning to cool the work area. Alternatively, increase the general ventilation as much as possible by opening windows or doors.

Safe Work Practices–For employees working outdoors or working indoors without air conditioning or ventilation, take scheduled breaks in cool areas. Ensure there is plenty of cool water to drink and take water breaks as needed.

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Supervisors should consider scheduling the hottest work for the coolest part of day, assigning extra employees to high demand tasks, and using work saving devices (e.g. power tools, hoists or lifting aids) to reduce the body's workload.

All employees should watch out for the safety of their coworkers.

Heat Index—The Heat Index is a single numeric value that uses both temperature and humidity to inform the public on how the weather outdoors “feels”. The higher the Heat Index, the hotter the weather feels. OSHA has used the Heat Index to assign protective measures for workers as the Heat Index increases.

Cold Related Signs and Symptoms, Treatment and Prevention Engineering Controls

During cold weather, an employee's body will use energy to maintain a normal internal body temperature. This will result in a shift of blood flow from employee's extremities (hands, feet and legs) and outer skin to the employee's core (chest and abdomen).

If this happens, cold-related illnesses and injuries may occur if exposed to cold conditions for an extended period of time.

Due to the severe consequences of exposure, employees should familiar with the signs and symptoms of cold weather induced health problems such as hypothermia, frostbite and trench foot.

The most common health problems caused by cold work environments include:

Hypothermia—Hypothermia is a potentially serious health condition. Hypothermia occurs when body heat is lost faster than it is replaced. When the core body temperature drops to approximately 95°F, the onset of symptoms normally begins.

The employee may begin to shiver, lose coordination, have slurred speech, and fumble with items in the hand. The employee's skin will likely be pale and cold. As the body temperature continues to fall these symptoms will worsen and shivering will stop. Once the body temperature falls to around 85°F severe hypothermia will develop and the person may become unconscious, and at 78° vital organs may begin to fail. Treatment depends on the severity of the hypothermia. For cases of mild hypothermia move to warm area and stay active. Remove wet clothes and replace with dry clothes or blankets, cover the head. To promote metabolism and assist in raising internal core temperature drink a warm (not hot) sugary drink. Avoid drinks with caffeine. For more severe cases do all the above, plus contact emergency medical personnel (Call 911 for an ambulance), cover all extremities completely, and place very warm objects, such as hot packs or water bottles on the victim's head, neck, chest and groin. Arms and legs should be warmed last. In cases of severe hypothermia, treat the employee very gently and do not apply external heat to re-warm.

Hospital treatment is required.

Frostbite—Frostbite occurs when the skin actually freezes and loses water. In severe cases, amputation of the frostbitten area may be required. While frostbite usually occurs when the temperatures are 30° F or lower, wind chill factors can allow frostbite to occur in above freezing temperatures. Frostbite typically affects the extremities, particularly the feet and the affected body part will be cold, tingling, stinging or aching followed by numbness. Skin color turns red, then purple, then white, and is cold to the touch. There may be blisters in severe cases. Do not rub the area to warm it. Wrap the area in a soft cloth, move the employee to a warm area, and contact medical personnel. Do not leave the employee alone. If help is delayed, immerse in warm (maximum 105 °F), not hot, water. Do not pour water directly on affected part. If there is a chance that the affected part will get cold a gain do not warm. Repeated heating and cooling of the skin may cause severe tissue damage.

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Trench Foot—Trench Foot is caused by having feet exposed to damp, unsanitary and cold conditions including water at temperatures above freezing for long periods of time. It is similar to frostbite, but considered less severe. Symptoms usually consist of tingling, itching or burning sensation. Blisters may be present. For treatment, soak feet in warm water, then wrap with dry cloth bandages. Drink a warm, sugary drink. Seek medical attention if necessary.

Dehydration—It is easy to become dehydrated during cold weather. Signs of dehydration include increasing thirst, dry mouth, weakness or light-headedness (particularly if worse up on standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks.

Just as with heat related illness, cold related illnesses and injuries are dangerous and potentially life threatening, however, they can be prevented. Prevention methods include:

Acclimation—Employees exposed to the cold should be physically fit, without any circulatory, metabolic, or neurologic diseases that may place them at increased risk for hypothermia. A new employee should not be required to work in the cold full time during the first days of employment until they become adjusted to the working conditions and required. New employees should be introduced to the work schedule slowly and be trained accordingly.

Engineering Controls—For employees working indoors, the best way to prevent cold-related illness is to make the work environment warmer. . Where and if possible, use heaters to warm the work area. Alternatively, decrease the general ventilation as much as possible by closing windows or doors.

Safe Work Practices—For employees working outdoors or working indoors without heat, take scheduled breaks in warm areas.

Regularly used walkways and travel ways shall be sanded, salted, or cleared of snow and ice as soon as practicable

If available, use wind barricades to block the wind from the employees.

Ensure there is plenty of water to drink and take water breaks as needed.

Immediately report any problems to a supervisor. Supervisors should consider scheduling the most work for the warmest part of day, assigning extra employees to high demand tasks that will require longer periods in cold areas. All employees should watch out for the safety of their coworkers.

Employees will be informed of the dangers associated with working around unstable snow and ice build ups such as sharp icicles, and ice dams and know how to prevent accidents caused by them.

Personal Protective Equipment (PPE)—PPE is an important factor in preventing cold stress related illnesses and injuries. Employees should adhere to the following recommendations

- when dressing for work in a cold environment:

Wear at least three layers of clothing; an inner layer of wool, silk or synthetic to wick moisture away from the body; a middle layer of wool or synthetic to provide insulation even when wet; an outer wind and rain protection layer that allows some ventilation to prevent overheating.

- Wear a hat or hood; up to 40% of body heat can be lost when the head is left exposed.
- Wear insulated boots or other footwear.
- Do not wear tight clothing; loose clothing provides better ventilation.
- Keep a change of clothing available in case work clothes become wet.

Training

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Supervisors shall ensure all employees have received Heat and /or Cold Stress training prior to working in such conditions and annually thereafter. Employees will be trained to administer proper first aid treatment on Hot/cold induced injuries or illnesses.

Record Keeping

All training records should be maintained in the employees personnel file and maintained by the supervisor.

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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

This program is written to be in compliance with regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the Drug and Alcohol Policy program.

This program applies to all employees of BTI, temporary employees and any contractors working for BTI. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

BTI Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the Drug and Alcohol Policy program. These procedures are kept in the designated safety manager's office.

Service/Office Manager

- Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the program.

Employees

- All shall be familiar with this program and the General Requirements program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.

Policy

Drug and alcohol testing will be given to all individuals prior to employment. Testing must be given before initial assignment.

Any employee or contractor on duty or on company property who possesses, sells, receives, is impaired or is determined to have measurable levels of any alcohol or illegal drug in their blood or urine (no matter the amount), post drug/alcohol screen, will be subject to immediate disciplinary action or contract dismissal.

Any employee or contractor involved in a job related incident while on duty or involving company equipment will be subject to a post-incident drug/alcohol screen.

If an employee or contractor returns to work following an absence of more than 90 days a return to work screening may be required. Follow up drug screening shall be applied when appropriate as determined by management.

We reserve the right to conduct random drug and alcohol screenings on employees and contractors who perform safety-sensitive functions, such as driving company property or entering any worksite. Additionally, we also reserve the right to conduct unannounced random drug and alcohol screening on employees or contractors. We

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will require an employee or contractor to submit to a drug/alcohol screen if we have reasonable suspicion to believe that he/she has violated the prohibitions concerning alcohol and/or controlled substances based on observations concerning the appearance, behavior, speech or body odors of that person.

Contractors or employees maintaining or using prescribed medications shall report the circumstances and effects to their supervisor. Some types of medications could have undesirable effects, and these can create a safety risk and endanger other contractors.

If needed, unannounced inspections could be made of persons entering or leaving company work sites by authorized company representatives. Entry onto company or client property is deemed to have provided consent to an inspection of a person, locker, vehicle, or any other personal effects.

Any refusals to submit to a drug/alcohol screen will be treated as a positive test, resulting in immediate contract dismissal or disciplinary action, up to and employment termination. The contractor or employee refusing to submit to the test will be asked to sign a refusal document. If they refuse to sign the document, it will be noted and kept on file.

Any employee or contractor receiving unacceptable test results will not be allowed to work on Client/Host sites or facilities.

Drug and alcohol screening will be performed by an approved and qualified medical clinic with a medical review officer authorized to perform the tests. All results are treated with confidentiality.

If another contractor or employee comes to management with concern regarding another contractor or employee in reference to alcohol or substance abuse, we will treat that with discretion and confidentiality. We will pursue investigation and decide accordingly whether a drug and or alcohol screen is the appropriate step to take.

All contractors and employees are subject to the policies explained above.

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Birmingham Toledo Inc. will be referenced by BTI in the following program.

Purpose

The purpose of the BTI Accident Investigation Program is to investigate all accidents and near misses, to identify the root cause(s) and develop corrective actions that can be taken to prevent future occurrences. Assigning blame to employees is not the purpose of this program.

Scope

BTI strives to provide all employees and on-site contractors with a safe and healthy workplace. This program is integrated into our company's written safety and health program and is a collaborative effort that includes all employees. The Program Administrator is responsible for the program's implementation, management and recordkeeping requirements.

A list of definitions is located in Appendix A.

While all incidents should be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process.

Key Responsibilities

Management

The management of BTI is committed to the accident investigation process. Management supports the efforts of the Safety Manager and the Safety Committee (if applicable) by pledging financial and leadership support for the investigation of accidents and near miss events. Management supports an effective accident reporting system and responds promptly to all reports. Management regularly communicates with employees about the program. Management ensures that employees will have the equipment needed to fulfill the duties assigned under this program. Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, etc.

Individual responsibilities for reporting and investigation must be pre-determined and assigned prior to incidents.

Safety Manager

The Accident Investigation Program Administrator reports directly to upper management and is responsible for this policy and program. All evaluations, investigations, training and recommended solutions are coordinated under the direction of the Safety Manager in collaboration with management. The Safety Manager monitors the results of the program and determines additional areas of focus that are needed. The Safety Manager also:

- Ensures supervisors and employees are properly trained to conduct accident investigations
- Ensures a system is in place for employees to report accidents and near misses
- Ensures accurate records are maintained and provides documentation upon request
- Follows up on all corrective actions suggested during the accident investigation process
- Ensures approved corrective actions are implemented in a timely manner

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- Conducts an annual review of the program

Managers and Supervisors

Managers and supervisors of BTI are:

- Accountable for the health and safety of all employees within their departments through their active support of the accident investigation program
- Required to attend accident investigation training to familiarize themselves with the elements of the program
- Responsible for ensuring that all employees under their supervision have received the appropriate training on accident and near miss reporting
- Responsible for initiating the accident investigation process within 24 hours of an incident
- Responsible for implementing approved corrective actions and ensuring they are completed appropriately through active follow-up

Employees

Every BTI employee is responsible for conducting himself/herself in accordance with this policy and program. All employees will:

- Attend accident and near miss reporting training
- Report all accidents and near misses as soon as possible to their supervisor, but no longer than two hours after the time of the incident

Reporting

All employees are required to report any accident or near miss to their immediate supervisor within two hours of the incident. The Accident Investigation Report Form (see Appendix D) is to be used by the supervisor to document the details of an accident or near miss and any proposed corrective action(s) for future prevention. Supervisors/Managers are to begin the accident investigation process within 24 hours of the initial incident. A copy of the initial report is to be forwarded to the Program Administrator within 48 hours of an accident or near miss.

Required incidents must be verbally reported to applicable regulatory agency(s) within 8 hours of their discovery. Incidents must also be reported to the client as soon as possible or in a timely manner (within 24 hours of incident).

Event Reconstruction

There should be an initial identification of evidence immediately following the incident. Some examples of such evidence might include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions.

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.

Interviews

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Within 24 hours, the manager or supervisor of the employee who was involved in the accident or near miss will begin interviewing employees who were involved or in close proximity to the incident, or who are familiar with the related process or work practices. All individuals will be interviewed separately. A minimum of two people must be interviewed for any accident or near miss reported.

Event Timeline

An event timeline will be developed for each reported accident or near miss. This timeline will start with the accident or near miss and be developed in reverse using information obtained from the interviews. Each task, event and employee decision that took place are to be added to the timeline. Also, the timeline will include all physical and emotional conditions known at the time of each action, event or decision along with the employee's knowledge, motivation, goals and focus at the time of any action, event or decision.

Identifying Root Cause(s)

After the timeline has been established, the investigator(s) will identify the root cause(s) that contributed to the accident or near miss.

Recommending Specific Solution(s)

After the root causes are identified, corrective actions will be identified to reduce or eliminate those hazardous conditions. The manager/supervisor and employees will develop and propose specific improvements that are operationally feasible. Those possible improvements will be submitted to the Safety Manager for validation, final approval and guidance for an implementation strategy.

When selecting and recommending these corrective actions, possible solutions will be prioritized using the following hierarchy. In this hierarchy of hazard control, the most desirable solutions come from the first level, with the following levels offering increasingly less desirable options.

1. Elimination – eliminating the hazard from the workplace
2. Substitution – replacing a hazardous substance or activity with a less hazardous one
3. Engineering controls – providing guards, ventilation or other equipment to control the hazard
4. Administrative controls – developing policies and procedures for safe work practices
5. Personal protective equipment – using respirators, earplugs, safety glasses, etc.

Recommended corrective actions will come from the highest possible level of the hierarchy of hazard control.

Monitoring Changes

Once implemented, corrective actions will be monitored by the manager/supervisor for effectiveness, to verify that net risk is not increased and to determine that the root cause of the incident has been eliminated or reduced. The manager/supervisor will conduct follow-up interviews with employees who were part of the accident investigation to determine if the implemented corrective actions require any adjustments to provide maximum safety to the employees.

Employee and Supervisor Training

New and previously untrained employees will receive training about this program and how it will be applied when investigating near misses and accidents. Employees and supervisors will receive refresher training at least every five years. Upon hire or promotion into their position, managers and supervisors will be trained on BTI

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investigation philosophy and the methods that should be used to conduct an accident investigation according to this program.

The minimum training for all employees will include the following elements:

- An explanation of the Accident Investigation Program and their role in it
- An emphasis on the importance and method of prompt reporting of accidents and near misses
- Review of the accident investigation form, with emphasis on determining contributing factors and corrective actions

Periodic Program Review

At least annually, the Safety Manager will conduct a program review to assess the progress and success of the program. The review will consider the following:

- Evaluation of all training programs and records
- The need for retraining managers, supervisors and employees
- The length of time between accidents, investigations and implementation of corrective actions
- The program's success based upon comparison to previous years, using the following criteria:
 - o Frequency of accidents and near misses
 - o Frequency of workers' compensation claims
 - o Insurance carrier's loss analysis
 - o Employee feedback through direct interviews, walk-through observations, written surveys and questionnaires and re evaluations

The annual review report will be submitted to senior management using the form in Appendix B.

Record Retention

BTI will maintain the information from accident investigations and training records for 2 years. All accident investigation records will be kept by the Safety Manager.

Appendix A – Definitions

Accident – An undesired event that results in personal injury or property damage.

Administrative (or Work Practice) Controls – Procedures that are used to reduce the duration, frequency or severity of exposure to a hazard. These may include work methods training, job rotation and gradual introduction to work.

Engineering Controls – A method of eliminating or reducing the quantity or severity of job risk factors by redesigning equipment, processes, tools and workstations.

Near Miss – An incident where no property was damaged and no personal injury sustained, but where damage and/or injury easily could have occurred given a slight shift in time or position.

Personal Protective Equipment (PPE) – Gloves, kneepads and other equipment worn by employees that may help reduce hazards until other controls can be implemented, or to supplement existing controls.

Root Cause – A condition that contributes to an incident or near miss. They are not always obvious, and may include items like lack of training, poor safety leadership, lack of rule enforcement or poor safety procedures.

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Appendix B – Annual Evaluation Report

Date of Evaluation:	Evaluated By (list all present):
Written Program Reviewed: Yes No	
Do completed accident investigation records indicate a need for additional manager, supervisor or employee training on the accident investigation program? Yes No	
Is there any record of excessive time between: <ol style="list-style-type: none"> An accident and completion of the accident investigation? Yes No Determining corrective actions and implementation of those controls? Yes No The beginning and completion of implementation of controls? Yes No If yes, what corrective action is needed?	
The following content was added/modified/removed from the written program:	

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Appendix D – Accident Investigation Report

Accident/Incident Information	
Name(s) of Injured Employee(s):	Date of Accident/Injury/Illness:
Work Area of Injured Employee(s):	Date Investigation Began:
Describe Nature of Accident, Injury or Illness:	
Part(s) of Body Affected:	
Describe Medical Treatment Administered:	
Witness Information	
Witness #1 Name:	Phone:
Witness's Description of Accident/Incident:	
Witness's Signature:	
Witness #2 Name:	Phone:
Witness's Description of Accident/Incident:	
Witness's Signature:	

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Investigation Results

List contributing factors/root causes:

Was a mandatory safe work practice violated? Yes No

Was the unsafe condition, practice or protective equipment problem corrected immediately? Yes No

If no, what has been done to ensure correction?

Do additional mandatory safe work practices need to be implemented? Yes No

If yes, please describe safe work practice:

List corrective actions taken and date implemented:

Signature of Investigator:

Date:

Signature of Person Responsible for Corrective Actions:

Date:

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Birmingham Toledo Inc. will be referenced by BTI in the following program.

Purpose

Process Safety Management is the proactive identification, evaluation and mitigation or prevention of chemical releases that could occur as a result of failures in process, procedures or equipment. The major purpose of process safety management of highly hazardous chemicals is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries.

Scope

BTI is required to recognize and participate as a contract employer at client locations with PSM programs in place. BTI as a contractor has certain obligations to fulfill in order to comply with established PSM programs.

Contract employer responsibilities

BTI shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.

BTI shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provision of the emergency action plan.

BTI shall document that each contract employee has received and understood the training required by this paragraph.

BTI shall prepare a record, which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.

BTI shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with CFR 1910.119(f)(4).

BTI shall advise the employer of any unique hazards presented by BTI's work, or of any hazards found by BTI's work.

BTI will assure that trade secret information will be kept in confidence as process safety information is released to them.

BTI employees shall participate in all client PSM requirements, including the following 14 ELEMENTS:

1. Employee participation
2. Process safety information
3. Process hazards analysis
4. Operating procedures
5. Training
6. Contractors
7. Pre start up review
8. Mechanical integrity
9. Hot work permits
10. Management of change

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11. Incident investigation
12. Emergency planning and response
13. A compliance audit
14. Trade secrets

- (1) Employee participation: This element requires a written action plan for involving employees in all PSM activities.
- (2) Process safety information: This element requires that certain information about a process be assembled and communicated to personnel. Process safety information includes system diagrams, safe operating limits, and equipment information.
- (3) Process hazards analysis: Is a systematic approach used to identify, evaluate, and control the hazards in a process. Process hazards analysis (PHA) can help determine where problems may occur in a process, so that corrective action can be taken to make a safer operation.
- (4) Operating procedures: operating procedures must be written for all processes, this includes start up, normal operation, normal shutdown and emergency shutdown. These procedures must be communicated to all employees.
- (5) Training: The training program must develop the knowledge, skills, and attitudes for working safely, and it must include an overview of the process, its potential hazards, relevant operating procedures and safe work practices. This element also requires initial training and periodic refresher training.
- (6) Contractors: This element involves the training of contractors
- (7) Pre start up review: Is a review of key safety considerations and operator training that is done before a new process is started up. A pre start up review is also required for modified processes that require a change in plant design or process safety information.
- (8) Mechanical integrity: Ensures the ongoing integrity of process equipment. This element requires testing and inspections to eliminate leaks that could cause the release of dangerous materials, and potential sources of ignition that could lead to fires or explosions. It also helps to ensure that equipment is designed, installed, maintained, and operated properly.
- (9) Hot work permits: Requires the use of hot work permits to certify that hot work, such as welding can be done safely.
- (10) Management of change: Ensures that changes to process chemicals, technology, equipment, and facilities are analyzed for their impact on health and safety. The analysis of such changes can then be used to determine necessary modifications to safety information, procedures, and training.
- (11) Incident investigation: Requires the investigation of every incident that results in or could have resulted in a catastrophic release. An investigation is necessary to identify the cause of the incident and provide the basis for taking corrective actions.
- (12) Emergency planning and response: Requires a facility to establish and implement an emergency action plan to deal with a release of highly hazardous chemicals. Operators and other personnel should know exactly what to do to minimize the consequences of an emergency.
- (13) Compliance audit helps to ensure that an effective process safety management system is in place and is working. The compliance audit provides a systematic way of verifying compliance with a process safety management program and identifying problems. Employers are required to respond to the audit findings in a timely manner.
- (14) Trade secrets require access to all necessary information for completing the other thirteen elements of the standard without regard to trade secret status.

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All elements are equally important, but some require more time than others. All elements must be met to meet the requirements of the PSM program.

BTI, as a contract employer, shall follow safe work practices established by the employer. The client shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tag out; confined space entry; opening process equipment or piping; hot work; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. This safe work practices shall apply to client employees and contractor employees. To comply with CFR 1910.119(f)(4),

BTI is required to complete all required documentation for any permit-required activities.

BTI shall not perform hot work until a hot work permit is obtained from the client. The permit shall document that provision of CFR 1910.252(a) have been met.

BTI employees must immediately report all accidents, injuries and near misses. An incident investigation must be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained for five (5) years.

In the event BTI becomes the sole operator of a facility, the existing PSM program for that facility may be amended and adopted, or, in the absence of a PSM program, an assessment will be required prior to assuming operating responsibilities.

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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the effort to ensure that our employees recognize the effect of fatigue as related to safely being able to perform work and establish guidelines for work hours and equipment to reduce fatigue in our business.

This program applies to all employees of BTI, temporary employees and any contractors working for BTI. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

BTI Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the fatigue management program.

Service/Office Manager

- Responsible for the implementation and maintenance of the plan for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the fatigue management Safety program.
- Employees must present in a fit state and free from alcohol and drugs.
- Employees must not chronically use over the counter, prescription drugs or any other product which may affect the employees ability to perform their work safely, including the fatigue that sets in after the effects of the drug wear off.
- Employees shall report tiredness/fatigue and lack of mental acuity to supervision and supervisors shall make safety critical decisions and take appropriate actions to prevent accidents including replacement of tired employees, changing schedules or forcing work stoppages.
- Employees need to be rested prior to work.
- Employees need to monitor their own performance and take regular periods of rest to avoid continuing to work when you are fatigued.

Work hour limitations and rest breaks to control fatigue and increase mental fitness

BTI suggest the following procedures limiting work hours and controlling job rotation schedules, also known as staff/work balance, to help manage worker fatigue. Service managers will set work limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and increase mental fitness in an effort to control employee turnover and absenteeism.

Sect. 1.8	Birmingham Toledo Inc. Safety Management System			Doc No:	GENHLTH
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
Fatigue Management				Revision No.	3
				Next Revision Date:	As needed
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety		Page:	Page 2 of 2

- Every employee shall have necessary work breaks to control fatigue. These breaks will apply to both driving and on site hours. The following shall be a minimum:
 - 15 minutes every 2.5 hours
 - 30 minutes after 5 hours
 - 30 minutes after 10 hours

Use of ergonomic friendly equipment

BTI shall ensure that ergonomic equipment will be used to improve conditions as deemed necessary and proper lighting and control of temperature to be evaluated as needed.

Analysis of work tasks to control fatigue

Work task to control fatigue must be evaluated periodically. BTI will make necessary changes to equipment, training or procedures based on evaluations.

Incident analysis

If there is an incident there shall be an initial identification/assessment of evidence. This might include a listing of people, equipment, materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, Etc. and physical factors such as fatigue, age and medical condition.

Initial and annual training for workers on fatigue and controlling fatigue

BTI is committed to ensuring that all employees are competent to perform their task including:

- Fatigue management and health issues
- Providing initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervisors.

A record of individual management training and competency will be maintained.

Sect. 1.9	Birmingham Toledo Inc. Safety Management System			Doc No:	GENHLTH
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
Hand and Portable Tool Safety				Revision No.	0
				Next Revision Date:	As needed
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety		Page:	Page 1 of 3

Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees to eliminate hazards associated with the use of hand and portable power tools; and to ensure employees are properly trained to utilize these tools in a safe manner to minimize injuries related to their use.

This Hand & Portable Power Tool Safety Program prescribes the duty to maintain tools and equipment; use hand and portable power tools in a safe manner; and to minimize injury and/or accidents associated with their use.

This program is developed in accordance with the following Occupational Safety and Health Administration (OSHA) regulations:

29 CFR 1910 Subpart P

Hand and Portable Powered Tools and Other Hand-Held Equipment

29 CFR 1910.241

Definitions

29 CFR 1910.242

Hand and portable powered tools and equipment, general

29 CFR 1910.243

Guarding of portable powered tools

29 CFR 1910.244

Other portable powered tools

This program applies to all employees of BTI, temporary employees and any contractors working for BTI. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

BTI Management

- Provides program oversight and consultation to BTI employees who utilize hand and portable power tools; including training; maintaining applicable records; performing program reviews and updates as necessary; and providing recommendations for safety procedures to supervisors and departments.
- Ensure the applicable components of the Hand and Portable Power Tool Safety Program are available to employees.
- Provide training to employees expected to utilize hand and portable power tools as part of their job duties.

Service/Office Manager

- Ensure hand and portable power tools are properly maintained and any equipment deficiencies are addressed to ensure employee safety.

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				Initial Issue Date	02/08/2010
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Hand and Portable Tool Safety				Revision No.	0
				Next Revision Date:	As needed
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- Maintain manufacturer manuals and other applicable documentation related to the hand and portable power tools in use.

Employees

- Employees who supervise personnel with responsibilities to work with hand and portable power tools must be informed of the contents of this program; identify authorized personnel to utilize equipment; address safety hazards in a timely manner ; and ensure appropriate training is provided to all employees.
- Employees working with hand and portable power tools must be fully trained to ensure all applicable elements of the BTI Hand and Portable Power Tool Safety Program are followed. In addition, employees are responsible for completing adequate training, reporting equipment deficiencies; and safe use of hand and portable power tools at all times.

General Safety Requirements

All hand and portable power tools must be maintained in a useable condition.

The following applies to all hand and portable power tool maintenance and use to minimize hazards associated with their use.

Maintain all tools in useable condition through following manufacturer recommendations for service; storing tools in the appropriate manner to minimize exposure to excessive temperature, humidity and corrosive materials; and reporting defects or deficiencies associated with tools to departmental supervisors upon discovery.

Use the appropriate tool for the job. Hand and portable power tools are designed and manufactured for specific uses. Employees must use tools and equipment in the manner intended by the manufacturer.

To prevent miss use of existing equipment and to prevent injuries, the supervisor shall ensure the proper tools are available to complete a job; if task is required to be completed by an employee where an appropriate tool is not present, the supervisor shall ensure the job is not completed until the appropriate tool is available.

Prior to use, tools and equipment should be inspected by the user to ensure they are in proper working order with no defects or deficiencies, which may result in unsafe use or injury to the user. Damaged tools and equipment must be removed from service and tagged to ensure unauthorized use does not take place.

Always operate tools and portable power equipment according to the manufacturer's specifications. Failure to do so may result in injury to the user.

Machine Guards and Safety Switches

Many tools and equipment protect exposed moving parts through various machine guarding techniques. Belts, gears, shafts, pulleys, sprockets, spindles, drums, flywheels, chains, or other reciprocating, rotating, or moving parts are typically guarded with safety shields or switches.

Machine guards must be provided to protect the user from the following:

Point of operation hazards

In-running nip points

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Rotating parts
Flying particles and sparks.

Machine guards directly cover a hazardous area of a tool or piece of equipment to prevent contact by the user. An example of a machine guard is the retractable cover on a circular saw, which exposes only the area of the blade performing the cutting action.

Safety switches are incorporated into many portable power tools to prevent unintended activation of the equipment. An example of a safety switch is a constant pressure switch, which requires the user to place pressure on the activation switch and releasing of the switch results in the tool shutting off or stopping.

Machine guards, safety switches, and any other safety elements of a tool or power tool, must not be removed, manipulated or tampered within any way.

Personal Protective Equipment (PPE)

Employees who use hand and portable power tools and are exposed hazards, such as noise, vibration, particulate, sparks/chips, abrasive, splashing objects, harmful dusts, fumes, mists, vapors and/or gases must be provided with the appropriate personal protective equipment (PPE).

The following considerations should be evaluated, at a minimum, in the selection and use of PPE when utilizing hand and portable power tools.

Eye protection-Safety glasses or goggles must be worn at all times when using hand and portable power tools. A face shield may be used in addition to safety glasses or goggles to protect the face and neck.

Foot protection-Appropriate foot protection, which may include closed toed shoes or steel toed boots, must be worn when working with hand and portable power tools.

Hearing protection-If the tool or equipment being utilized generates excessive noise, the use of hearing protection may be necessary. Follow the manufacturer's recommendations for hearing protection.

Respiratory protection-Tools and equipment, which generate excessive dust, may require the use of a particulate filtering respirator.

Hand protection-Whenever there are sharp objects or elevated temperatures associated with the work being conducted, adequate hand protection must be provided to the employee performing the work.

Body protection-Depending on the hazard present, appropriate clothing must be worn during the use of Hand/portable power tools.

Hair Protection-Long hair must be tied back and secured during the use of power tools to prevent hair being caught in moving parts.

Sect. 1.10	Birmingham Toledo Inc. Safety Management System			Doc No:	GENHLTH
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
General Waste Management				Revision No.	0
				Next Revision Date:	As needed
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety		Page:	Page 1 of 1

Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of this waste management strategy was developed to provide guidance and requirements necessary for efficient, effective and compliant waste management during construction and operations.

Scope

This procedure applies to all BTI employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

The service managers or other designated person in his or her absence is accountable for managing waste and disposition of wastes generated at the work site.

Waste Estimation

Each work site will estimate the waste, trash and/or scrap that will be generated and taken into consideration prior to work being performed so the need for containers and waste removal, if necessary, can be determined.

BTI must coordinate with the project site or owner to ensure proper disposal of wastes or scrap materials.

BTI must ensure the owner client is aware of whether wastes and scrap materials will be taken off site by BTI or will be disposed of on the owner client's site.

Waste Segregation

- Place waste in a properly designated container when one is provided.

Recycling

Wastes should be recycled whenever practicable. BTI will encourage proper segregation of waste materials to ensure opportunities for reuse or recycling occurs at each work site. The collection of recycled material will reduce the total load on the environment. Wastes should be stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees.

Education and Training

Employees shall be instructed on managing waste generated at the work site and on the proper disposal method of wastes. Examples include:

- Instruction on the proper handling, storage and disposal of wastes and depending on the waste generated at the site to also include general instruction on disposal of non-hazardous wastes, trash or scrap materials. If wastes generated are classified as hazardous then employees shall be trained to ensure proper disposal and compliance with regulations.
- Minimization methods to reduce waste.
- Recycling methods and proper PPE to be utilized.

Sect. 1.11	Birmingham Toledo Inc. Safety Management System			Doc No:	GENHLTH
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
Spill Prevention and Response				Revision No.	0
				Next Revision Date:	As needed
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety		Page:	Page 1 of 1

Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of this plan is to document spill prevention and response requirements.

Scope

This procedure applies to all BTI operations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Requirements

- Chemical substances should be stored in proper containers to minimize the potential for a spill
- Spill kits must be adequate for any anticipated spills. A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials
- Employees must be instructed on spill prevention and the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal and communication procedures.
- Areas where chemicals may be used or stored must be maintained using good housekeeping best management practices. This includes, but is not limited to clean and organized storage, labeling and secondary containment where necessary.
- Proper communication measures for employees to initiate in the event of a spill will be created on a site by site basis. Communication procedures will be based on type and quantity of materials spilled.
- Environmental spills shall be reported to environmental authorities when required. Reporting procedures will be based on type and quantity of materials spilled.

Sect. 1.12	Birmingham Toledo Inc. Safety Management System			Doc No:	GENHLTH
				Initial Issue Date	02/08/2016
				Revision Date:	Initial Version
Manual Lifting				Revision No.	1
				Next Revision Date:	As needed
Preparation: Safety Mgr		Authority: President	Issuing Dept: Safety	Page:	Page 1 of 3

Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

BTI is committed to providing a safe and healthy working environment for all employees. Musculoskeletal disorders (MSD) account for a majority of reported injuries and we must minimize the risk and incidence of MSDs. To achieve this goal, BTI has established and maintains a MSD, Lifting and Handling Loads Program with the following elements:

- Ongoing training of management, supervisors, and employees (including new hires) on MSD awareness hazards and control measures
- MSD hazard identification and assessment
- Control of MSD hazards through the application of engineering and/or administrative controls
- Proactively integrating ergonomics principles into workplace design and work techniques
- A realization that personal protective equipment may only be used as a substitute for engineering or administrative controls if it is used in circumstances in which those controls are not practicable.

Key Responsibilities

BTI Safety Manager

Develops a Lifting and Handling Loads Program in accordance with this procedure and ensures all employees are aware of the requirements of the Lifting and Handling Loads Program.

- Communicate, promote and support the MSD, Lifting and Handling Loads Program.
- Conduct MSD training sessions and/or provide MSD training materials.

Service Manager

Responsible for the implementation and maintenance of the Lifting and Handling Loads Program for their facility and ensuring all assets are made available for compliance with the procedure. He or she will also:

- Ensure that all worksite departments implement and maintain the provisions of the Lifting and Handling Loads Program.
- Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists must be provided for employees. Other engineering controls such as conveyors, lift tables, and work station design should be considered.
- Use of provided manual lifting equipment by employees must be enforced.

Employees

- Attend MSD training and practice MSD prevention strategies as per MSD training.
- Comply with safe work procedures.
- Report any unsafe acts, unsafe tasks, unsafe conditions or equipment problems that create MSD hazards.

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				Initial Issue Date	02/08/2016
				Revision Date:	Initial Version
Manual Lifting				Revision No.	1
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Procedure

Worksite Assessment

Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried.

Work Controls

BTI must ensure based on the assessment, implement control measures to eliminate, minimize or reduce, so far as is reasonably practicable, the risk of musculoskeletal injury to the worker.

Handling Heavy or Awkward Loads

BTI will take all practicable means to adapt the heavy or awkward loads to facilitate lifting, holding or transporting by workers or to otherwise minimize the manual handling required. Those include:

- Where use of lifting equipment is impractical or not possible, two man lifts must be used.
- All loads carried on handcarts shall be secured.
- All awkward type loads shall be secured to prevent tippage.
- Additional methods include:
 - reducing the weight of the load by dividing it into two or more manageable loads
 - increasing the weight of the load so that no worker can handle it and therefore mechanical assistance is required
 - reducing the capacity of the container
 - reducing the distance the load must be held away from the body by reducing the size of the packaging
 - providing hand holds
 - team lift the object with two or more workers
 - improve the layout of the work process to minimize the need to move materials
 - reorganize the work method(s) to eliminate or reduce repeated handling of the same object
 - rotate workers to jobs with light or no manual handling
 - use mobile storage racks to avoid unnecessary loading and unloading.

Incidents and Injuries

If an employee reports symptoms of a MSI BTI will:

- Musculoskeletal injuries caused by improper lifting must be investigated and documented. Incorporation of investigation findings into work procedures must be accomplished to prevent future injuries.
- Injuries must be recorded and reported as required by 29 CFR Part 1904.

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Review & Updating Lifting and Handling Loads Program

- Supervision must periodically evaluate work areas and employees' work techniques to assess the potential for and prevention of injuries. New operations should be evaluated to engineer out hazards before work processes are implemented.

Training

BTI shall ensure that a worker who may be exposed to the possibility of musculoskeletal injury is trained in specific measures to eliminate or reduce that possibility. Our training shall include:

- General principles of ergonomics,
- proper lifting techniques and avoidance of musculoskeletal injuries,
- Recognition of hazards and injuries,
- Procedures for reporting hazardous conditions, and
- Methods and procedures for early reporting of injuries.

Additionally, job specific training will be given on safe lifting and work practices, hazards, and controls.

Sect. 1.13	Birmingham Toledo Inc. Safety Management System			Doc No:	GENHLTH
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
Short Service Employee Program (SSE)				Revision No.	0
				Next Revision Date:	As needed
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety		Page:	Page 1 of 2

Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of the Short Service Employee (SSE) Management program is to prevent work related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short Service Employee participants. BTI will assign experienced employees to oversee the daily activities of those assigned to the SSE program.

Scope

Applies to all BTI employees in shop and field operations.

Applies to all newly hired BTI employees (regardless of experience), temporary agency personnel or our independent contractors working on BTI client locations/ facilities.

Definitions

Short Service Employee (Who is Covered Under the Short Service Employee Program) – An employee or sub-contractor employee with less than six months experience in the same job or with his/her present employer.

Mentor – An experienced employee, who has been assigned to help and work with a new Short Service Employee by his/her supervisor.

Key Responsibilities

Managers and Supervisors shall ensure that this program is implemented and followed.

Employees shall follow the requirements of this program.

Monitoring of Short Service Employees at the Job Site

BTI shall monitor its employees, including SSE personnel, for HES awareness. If, at the end of the six-month period, the SSE has worked safely, adhered to HES policies and has no recordable incident attributable to him/her, the SSE identifier may be removed at the discretion of BTI management.

Processes for Managing Subcontractors

BTI will manage its sub-contractors in alignment with this process. Any sub-contractor employee reporting to work must document his or her experience with BTI personnel for the work they are performing.

Sect. 1.13	Birmingham Toledo Inc. Safety Management System			Doc No:	GENHLTH
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
Short Service Employee Program (SSE)				Revision No.	0
				Next Revision Date:	As needed
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety		Page:	Page 2 of 2

Procedure

General

Supervisors will assure that all new, transferred and temporary employees have been through BTI Safety Orientation and have a complete knowledge of the expectations for their job function.

Supervisors will identify all employees and temporary personnel with less than 180 days of service, or those employees they desire to return to a mentoring status for improvement in job and/or safety performance. Any Short Service Employee experiencing an OSHA Recordable injury during the initial 180 days will repeat the mentoring program or shall be dismissed for poor performance.

Managers and the Safety Department will randomly audit for process compliance. This will involve interviewing employees in the Short Service Employee program (documentation is not required).

Mentoring Provisions and Processes

Mentors will set the proper safety example for any Short Service Employee assigned them.

BTI must have in place some form of mentoring process designed to provide guidance and development for SSE personnel. A mentor can only be assigned one SSE per crew and the mentor must be onsite with the SSE to be able to monitor the SSE.

Short Service Employee Identification

Short Service Employee participants will wear high visibility orange hard hats or an SSE decal to help identify them.

Crew Makeup and Restrictions

A single person crew cannot be an SSE and crew sizes of less than five shall have no more than one SSE.

Notification and Communication Processes

Prior to the job mobilization BTI will communicate/notify the client project coordinator, contractor contact or on-site supervisor for all jobs containing SSE personnel. The project coordinator, contractor contact or on-site supervisor will determine approval status of the crew makeup.

Mentors will converse daily with those persons assigned to them, preferably at the start of the day. This will be in addition to other tailgate or daily safety meetings held in the work area.

Sect. 2.0	Birmingham Toledo Inc. Safety Management System			Doc No:	DISCPLN
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
DISCIPLINARY PROGRAM				Revision No.	0
				Next Revision Date:	As Needed
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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of this program is to establish a firm but fair disciplinary action policy to enforce the safety system.

Scope

This document is applicable to all employees.

Responsibilities

It is the responsibility of each and every person employed by BTI to work in a safe and efficient manner. The safety system provides guidelines and procedures to help insure that safe work practices are observed. In the event that any employee violates provisions of the BTI safety system or works in a manner that threatens his own health and safety or the health and safety of the employees around him/her, he/she will be subject to disciplinary action, up to and including termination of employment.

The safety manager, Service/Office managers, supervisors and foremen are responsible for enforcing the safety system and for issuing disciplinary action as required by this section of the safety manual.

BTI is committed to safety and senior management holds all supervisory staff responsible and accountable for safety within their respective areas. Workplace inspections are conducted to ensure employees are following safety rules and policies.

Physical inspections by BTI officials or insurance representatives that indicate violations showing overall lack of commitment to BTI safety goals shall be under the same level of disciplinary actions.

Requirements

Safety is a core value and a condition of employment at BTI. The following actions constitute a safety violation:

- Not following verbal or written safety procedures, guideline or rules of BTI or our clients
- Horse play, failure to wear required PPE, and or abuse of PPE
- Being under the influence of drugs or alcohol during work
- Bringing weapons on the job site
- Failure to report incidents or injuries
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

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				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
DISCIPLINARY PROGRAM				Revision No.	0
				Next Revision Date:	As Needed
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Procedure

The following procedures will be followed after issuing a safety violation notice:

- The first offense will result in a verbal warning. The employee is to be informed that he is being issued a verbal warning and informed why. Proper procedure will be discussed to clarify the situation and allow the employee to correct his behavior. The person making this verbal warning will inform the operations manager of his branch that this warning has been issued so the operations manager may make a written record of the warning.
- The second offense within a 12 month period will result in a written reprimand and additional training. The reprimand will be written on the standard Safety Reprimand form (see below) and will describe the unsafe activity or behavior that needs correction. Refer to the section of the safety program that was violated (when applicable). The employee receiving the reprimand has the right to submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The third offense within a 12 month period will result in another written reprimand (using the standard form) and punitive layoff, the duration of which will be decided at the time of the disciplinary action and is to be weighed by the severity of the offense. Again, the employee may submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The fourth offense within a 12 month period may result in the termination of the offending employee.

In the case of serious safety violations such as by-passing guarding or other unsafe activities that put the violator or other employees at serious risk of injury, the manager may move the violator directly to the second or third warning level. If the violator's actions put him or others at risk of death or dismemberment the manager has the option to terminate him with no further warning.

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				Initial Issue Date	02/08/2010
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DISCIPLINARY PROGRAM				Revision No.	0
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Safety Reprimand Form

Date: _____ Reprimand # _____

Issued To: _____

Signature: _____

Issued By: _____

Signature: _____

Violation (Describe in Detail):

Follow up Training: _____

Presented by: _____

Date of Training: _____

Trainee Signature: _____

Sect. 3.0	Birmingham Toledo Inc. Safety Management System			Doc No:	EAP
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
EMERGENCY ACTION PLAN				Revision No.	0
				Next Revision Date:	As Needed
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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

Birmingham Toledo Inc. will be referred to as BTI in the following document.

Each BTI location shall have a written Emergency Action Plan, appropriate to the hazards of the workplace, in order to respond to an emergency that may require rescue or evacuation.

Each Emergency Action Plan shall be prepared to reflect all known probable emergency conditions which may arise from within the workplace and from adjacent workplaces, the minimum of which will include fire or other emergencies.

Contact information will be provided to employees who need additional information pertaining to the plan or to their respective duties.

An emergency action plan must be in writing, kept in the workplace and available to employees for review.

Emergency Response Planning, Issuing and Annual Review Guidelines

Emergency Procedures shall be issued and discussed with all new/transferred personnel upon arrival for assignment.

Emergency Action Plans shall be established, implemented, reviewed, maintained and updated annually in conjunction with:

- BTI safety staff and management.
- The requirement to ensure the plan is up to date to reflect current circumstances at the workplace.

Additionally, a review of the emergency action plan should occur with employees:

- When the plan is developed or the employee is assigned initially to a job.
- When the employee's responsibilities under the plan change.
- When the plan is changed.

Evacuation Procedures Planning

Procedures for emergency evacuation shall include type of evacuation and exit route assignments. The individual site evacuation procedure shall be appropriate to the risk must be developed and implemented to:

- Notify employees of the nature and location of the emergency,
- Evacuate employees safely,
- Check and confirm the safe evacuation of all employees,
- Notify the fire department or other emergency responders, and

List of Potential Emergencies

Each location shall conduct a risk assessment for hazards posed by tornados, fie or other such emergencies that could cause an evacuation or rescue and list the potential emergencies for BTI operations. Procedures for each of these potential emergencies shall be contained within the Emergency Action Plan.

Sect. 3.0	Birmingham Toledo Inc. Safety Management System			Doc No:	EAP
				Initial Issue Date	02/08/2010
				Revision Date:	Initial Version
EMERGENCY ACTION PLAN				Revision No.	0
				Next Revision Date:	As Needed
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Guidance Procedures for Potential Emergencies

Fire

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area. Do not leave the assembly area until your supervisor has accounted for you.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Gas Leaks/Chemical Spills - Upon smelling or noticing a gas leak or unusual vapors, or a chemical spill:

- Pull fire alarm (if present) or sound warning and evacuate the premises via the nearest exit
- Proceed to the Emergency Assembly Area and do not leave the assembly area until your supervisor has accounted for you.
- Contact local emergency response personnel by phone or radio
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Medical Emergencies

- Call for assistance by phone or radio. Give the exact location and details of the medical emergency.
- If qualified, provide basic first aid, and keep the person comfortable. Do not move the person. Do not leave him/her unattended.
- Arrange for emergency medical transportation based on the medical planning portion of the site's Emergency Action Plan.

Tornado

- Go to a small interior room on the lowest level, Get down on the floor, take shelter under tables or desks, and protect your face and head against flying glass and debris.
- Once it is safe to do so, evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area. Do not leave the assembly area until your supervisor has accounted for you.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Workplace Violence

- Notify management immediately by phone or radio and report the occurrence.
- Do NOT attempt to physically intervene. Protect yourself first at all costs.

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Training

BTI shall ensure training for Emergency Action Plan is delivered, documented and prepares the staff and facility for emergency conditions. BTI will designate and train employees to assist in a safe and orderly evacuation of other employees. Requirements include:

- All employees must be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to their workplace.
- The designated site representative shall provide the Emergency Action Plan orientation to all new/transferred personnel before they begin work.
- The Emergency Action Plan Orientation Check List shall be completed after orientation and the record maintained in the individual's training records.
- BTI management shall ensure that contractors/consultants working in areas under the supervision of BTI also receive the Emergency Action Plan orientation upon arrival to the area.
- Employees expected to perform duties under the Emergency Action Plan will be trained prior to assuming their roles. This will include simulated rescue or evacuation exercises and regular retraining, appropriate to the type of rescue or evacuation being provided, and training records must be kept.
- A list of trained staff responders shall be posted and maintained indicating their name, response function, their work location and what type of equipment they have been trained for.

Fire Protection & Response

BTI shall ensure each Emergency Action Plan provides fire protection and response planning within each site Emergency Action Plan and is utilized during all phases of work. As a minimum, all shall include the following:

Protection

- Smoking is not permitted except in designated 'SMOKING' areas.
- Facilities shall be designed and maintained in accordance with local fire code and regulations.
- Portable fire extinguishers shall be stationed, inspected and maintained in accordance with local fire code and regulations.
- Flammable and combustible liquids shall be properly stored.
- Employees shall report all fire safety issues to their immediate supervisor.

Response

In the event of a fire, personnel working in facility will adhere to the following procedure for their work area:

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

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FIRST AID/CPR				Revision No.	0
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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of this program is to establish the minimum first aid supplies, equipment and actions to properly respond to injuries.

Scope

This program is applicable to all BTI employees while engaged in work at BTI facilities and/or facilities operated by others.

Responsibilities

- It is the responsibility of the service managers to ensure that first aid kits are provided and maintained.
- All employees are responsible for using first aid materials in a safe and responsible manner.
- The safety Manager is responsible for corresponding with the Red Cross or an equivalent to keep employee training levels current.

Requirements

Planning

The service managers will:

- Ensure that a minimum of one employee, with a valid certificate, shall be present to render first aid at all times work is being performed if medical assistance is not available within 3-4 minutes.
- Ensure adequate first aid supplies and equipment are easily accessible when required.

Medical Response

All minor first aid is to be self rendered. Because of the risks presented by certain bloodborne pathogens, no one is allowed to tend the minor injuries of another.

In the absence of medical assistance within 3-4 minutes of a BTI worksite there shall be a person who has a valid certificate in first aid training from the American Red Cross or equivalent and able to render emergency first aid. Employees authorized to render first aid will always observe universal precautions. (Universal Precautions means that the aid giver treats all bodily fluids as if they were contaminated).

Supplies and Equipment

First aid supplies shall be provided in easily accessed and posted locations. Always follow the manufacturer's instructions when using the materials in the first aid kit.

All BTI first aid kits contain appropriate items determined to be adequate for the environment in which they are used and are stored in a weather proof container with individual contents sealed from the manufacturer for each type of item.

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BTI is responsible to ensure the availability of adequate first aid supplies and to periodically reassess the demand for supplies and to adjust its inventories. First Aid kits are to be inspected:

- To verify that they are fully stocked and that no expiration dates have been exceeded, and
- Replace any items that have exceeded their expiration dates or that have been depleted.

Where the eyes or body of any person may be exposed to injurious corrosive materials, a safety shower and/or eye wash (suitable facilities) or other suitable facilities shall be provided within the work area. Ensure expiration dates are checked and water used in storage devices is sanitized.

An assessment of the material or materials used shall be performed to determine the type flushing/drenching equipment required. At client job sites, portable or temporary stations must be established prior to the use of corrosive materials.

Transportation

Based on the first responder's assessment of the injuries involved, decide whether the injured requires to be taken directly to a hospital's emergency room, occupational medicine provider or administer first aid on location.

Examples of serious injuries that result in the injured being transported to a medical provider are those resulting in severe blood loss, possible permanent disfigurement, head trauma, spinal injuries, internal injuries and loss of consciousness. Keep in mind that the needs and well being of the injured are the first priority.

Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service shall be provided.

Choices to consider include: private automobile, company vehicle, helicopter, EMS vehicles including medi-vac helicopters, or any other transportation that can provide safe transportation to the hospital or doctors office in order to provide medical attention to the injured in the quickest manner without any additional complications or injuries to the injured employee.

Training

Volunteers or selected employees are trained by the American Red Cross in CPR and first aid. Each of these trained and certified employees are equipped with protective gloves and other required paraphernalia. CPR training must be re-certified Bi-annually and first aid training must be certified every three years.

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Birmingham Toledo Inc. will be referenced by BTI in the following program.

Purpose

This Bloodborne Pathogen Exposure Control Plan has been established to ensure a safe and healthful working environment and act as a performance standard for all employees. This program applies to all occupational exposure to blood or other potentially infectious materials. The content of this plan complies with OSHA Standard 29 CFR 1910.1030 (Occupational Exposure to Bloodborne Pathogens).

Scope

All employees who have or may have the potential for exposure to blood or other potentially infectious materials in the workplace.

Key Responsibilities

Exposure Control Officer (BTI Safety Manager)

Has overall responsibility for developing and implementing the Exposure Control Procedure for all facilities.

Service/Office Managers and Supervisors

Service managers and supervisors are responsible for exposure control in their respective areas.

Employees

- Know what tasks they perform that have occupational exposure.
- Plan and conduct all operations in accordance with our work practice controls.
- Develop good personal hygiene habits.

Procedure

Training

Employees with reasonable anticipated occupational exposure to bloodborne pathogens shall participate in training before their initial assignment and within one year of any previous training. Training shall include:

- What bloodborne pathogens are; how to protect themselves from exposure
- Methods of warnings (signs, labels, etc.)
- The OSHA requirements of bloodborne pathogens
- Availability of the Hepatitis B vaccine that have occupational exposure at no cost



Biohazard Label

Availability of Procedure to Employees

The Bloodborne Exposure Control Plan is kept at all locations and shall be accessible to employees.

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Reviews and Update of the Procedure

The procedure is reviewed annually and updated whenever we establish new functional positions within our facility that may involve exposure to biohazards.

Exposure Determination

- There are no job classifications in which some or all employees have occupational exposure to bloodborne pathogens that may result from the performance of their routine duties.
- Designated employees are trained to render first aid and basic life support. Rendering first aid or basic life support will expose employees to bloodborne pathogens and will require them to adhere to this program.
- In addition, no medical sharps or similar equipment is provided to, or used by, employees rendering first aid or basic life support.
- This exposure determination has been made without regards to the Personal Protective Equipment that may be used by employees.
- A listing of all first aid and basic life support trained employees in this work group shall be maintained at each work site and at each first aid kit.

Methods of Compliance

Universal Precautions

Under circumstances in which differential between body fluids is difficult or impossible, all body fluids will be considered potentially infectious and universal precautions must be observed.

Engineering Controls

Hand washing facilities (or antiseptic hand cleansers or antiseptic towelettes), which are readily accessible to all employees who have the potential for exposure.

Work Practice Controls

- Employees shall wash their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other infectious materials, employees wash their hands and any other exposed skin with soap and water as soon as possible.
- Hand washing facilities shall be available. If hand washing facilities are not feasible BTI will provide either an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes.
- Contaminated needles and other contaminated sharps should not be handled if you are not AUTHORIZED or TRAINED to do so. Contaminated needles and other contaminated sharps are not bent or recapped.
- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is potential for exposure to biohazardous materials.
- Food and drink is not kept in refrigerators, freezers, on countertops or in other storage areas where potentially infectious materials are present.
- All equipment or environmental surfaces shall be cleaned & decontaminated after contact with blood or other potentially infectious materials.

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- Specimens of blood or other potentially infectious materials must be put in leak proof bags for handling, storage and transport.
- If outside contamination of a primary specimen container occurs, that container is placed within a second leak proof container, appropriately labelled,-for handling and storage.
- Bloodborne pathogens kits are located on top of first aid kits and are to be used in emergency situations by the caregiver. Once the seal is broken on kit and any portion has been used it is not to be reused. Pathogen Kits shall be ordered and replaced promptly. Biohazard bags are identified by stickers and located in the first aid area. Contaminated supplies are to be disposed at once.

Personal Protective Equipment

BTI provides at no cost to our employees gloves, safety glasses, goggles, gowns, face shields/masks and other as need PPE for bloodborne pathogens response. All PPE shall be of the proper size and readily accessible.

Our employees adhere to the following practices when using their personal protective equipment:

- Any garments penetrated by blood or other infectious materials are removed immediately.
- All potentially contaminated personal protective equipment is removed prior to leaving a work area.
- Gloves are worn whenever employees anticipate hand contact with potentially infectious materials or when handling or touching contaminated items or surfaces.
- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an "exposure barrier".
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Any PPE exposed to bloodborne pathogens shall be disposed of properly.
- PPE shall be used unless employees temporarily declined to use PPE under rare circumstances.
- PPE should be cleaned, laundered & properly disposed of if contaminated.
- BTI will repair and replace PPE as needed to maintain its effectiveness.

Housekeeping

Our staff employs the following practices:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials.
- Protective coverings (such as plastic trash bags or wrap, aluminum foil or absorbent paper) are removed and replaced.
- All trash containers, pails, bins, and other receptacles intended for use routinely are inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
- Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).

Post-Exposure and Follow Up

Post-Exposure Evaluation & Follow-Up

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If there is an incident where exposure to bloodborne pathogens occurred we immediately focus our efforts on investigating the circumstances surrounding the exposure incident and making sure that our employees receive medical consultation and immediate treatment.

The BTI Safety Manager/ Supervisor investigates every reported exposure incident and a written summary of the incident and its causes is prepared and recommendations are made for avoiding similar incidents in the future. We provide an exposed employee with the following confidential information:

- Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred.
- Identification of the source individual (unless not feasible or prohibited by law).

Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified healthcare professional to discuss the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

Information Provided to the Healthcare Professional. We forward the following:

- A copy of the Biohazards Standard.
- A description of the exposure incident.
- Other pertinent information.

Healthcare Professional's Written Opinion

After the consultation, the healthcare professional provides our facility with a written opinion evaluating the exposed employee's situation. We, in turn, furnish a copy of this opinion to the exposed employee. The written opinion will contain only the following information:

- Whether Hepatitis B Vaccination is indicated for the employee.
- Whether the employee has received the Hepatitis B Vaccination.
- Confirmation that the employee has been informed of the results of the evaluation.
- Confirmation that the employee has been told about any medical conditions resulting from the exposure incident which require further evaluation or treatment.
- All other findings or diagnoses will remain confidential and will not be included in the written report.

Record Keeping

All records shall be made available upon request of employees, OSHA's Assistant Secretary and the Director of OSHA for examination and copying. Medical records must have written consent of employee before released. BTI shall meet the requirements involving transfer of records set forth in 29 CFR 1910.1020(h).

The respective Human Resources representative shall maintain Bloodborne Pathogen exposure records.

Employee medical records shall be kept confidential and are not to be disclosed without the employee's written consent, except as required by 29 CFR 1910.1030 or other law.

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Medical records shall be maintained for the duration of employment plus 30 years and shall include at least the following:

- Employee's name, Social Security number
- Employee's Hepatitis B vaccination status, including vaccination dates.
- All results from examinations, medical testing and follow-up procedures, including all health care professional's written opinions.
- Information provided to the health care professional.
- Any Hepatitis B Vaccine Declinations.

Training records shall be maintained for 3 years from the date on which the training occurred and shall include at least the following:

- Outline of training program contents.
- Name of person conducting the training.
- Names and job titles of all persons attending the training.
- Date of training.

Labels and Signs

Biohazard warning labelling shall be used on containers of regulated waste; Sharps disposal containers; contaminated laundry bags and containers; contaminated equipment.

Information

Information provided to our employees includes:

- The Biohazards Standard itself.
- The epidemiology and symptoms of bloodborne diseases.
- The modes of transmission of bloodborne pathogens.
- Our facility's Exposure Control Procedure (and where employees can obtain a copy).
- Appropriate methods for recognizing tasks and other activities that may involve exposure.
- A review of the use and limitations of methods that will prevent or reduce exposure.
- Selection and use of personal protective equipment.
- Visual warnings of biohazards within our facility including labels, signs and "color-coded" containers.
- Information on the Hepatitis B Vaccine.
- Actions to take and persons to contact in an emergency involving potentially infectious material.
- The procedure to follow if an exposure incident occurs, including incident reporting.
- Information on the post-exposure evaluation and follow-up, including medical consultation.

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VACCINATION DECLINATION FORM

Date: _____

Employee Name: _____

Employee ID#: _____

I understand that due to my occupational exposure to blood or other potential infectious materials I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, I decline the Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If, in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee Signature

Date

Facility Representative Signature

Date

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POST-EXPOSURE EVALUATION AND FOLLOW-UP CHECKLIST

The following steps must be taken, and information transmitted, in the case of an employee's exposure to bloodborne pathogens:

ACTIVITY

COMPLETION DATE

Employee furnished with documentation regarding exposure incident.

Source individual identified.

(_____) Source individual

Appointment arranged for employee with healthcare professional.

(_____) Professional's name

Documentation forwarded to healthcare professional

Bloodborne Pathogens Standard

Description of exposed employee's duties

Description of exposure incident, including routes of exposure

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Birmingham Toledo Inc. will be referenced by BTI in the following program.

Purpose

The purpose of this program is to ensure that the hazards of all chemicals and substances are evaluated and the information concerning their hazards is communicated to employees, including emergency response organizations, state and federal agencies, other employers and contractors, as necessary. This hazard information will be communicated, and displayed in accordance with this Hazard Communication Program.

BTI is firmly committed to providing each of its employees a safe and healthy work environment. It is recognized that workers may use chemicals or substances that have potentially hazardous properties. When using these substances, workers must be aware of the identity, toxicity or hazardous properties of a chemical or substance, since an informed employee is more likely to be a safe employee. To this end, BTI has established a written Hazard Communication Program.

Our company is complying with the requirements of OSHA's Hazard Communication Standard by compiling a list of hazardous chemicals, using safety data sheets (SDSs), ensuring that containers are labeled or provided other forms of warning, and training our worksite employees. In addition, we share information with other employers involved in a specific project so that they may keep their employees informed.

Scope

This program applies to all work operations at BTI where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements..

Definitions

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

Chemical Inventory List - a list of chemicals used at this facility, or by personnel that report to this facility.

Electronic Access – using electronic media (telephone, fax, internet, etc.) to obtain Material Safety Data Sheets or health information.

Facility - an establishment at one geographical location containing one or more work areas.

Hazardous chemical - any chemical that is a physical hazard, a health hazard, or has a Permissible Exposure Limit established for it.

Hazardous substance - see hazardous chemical.

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Hazard Communication Program Coordinator - the person who has overall responsibility at a facility for that facility's Hazard Communication Program.

Health hazard - a substance for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic adverse health effects may occur in exposed employees.

IDLH - immediately dangerous to life and health.

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

Jobsite - an area remote from a BTI facility where hazardous chemicals are stored or used and employees are present for the purpose of BTI business.

(SDS) Safety Data Sheet - a written or printed document containing chemical hazard and safe handling information, prepared in accordance with the OSHA Occupational Safety & Health Standards, Section 1910.1200, paragraph (g).

(NFPA) National Fire Protection Association Labeling - a common industry labeling method developed by the National Fire Protection Association to identify the hazards associated with a particular chemical.

(PEL) Permissible Exposure Limit - the maximum eight-hour time weighted average of any airborne contaminant to which an employee may be exposed.

Readily available - when an employee has access during the course of his/her normal work shift.

Substance - see Chemical.

(TLV) Threshold Limit Value - the airborne concentration of a substance that represents conditions under which it is believed that nearly all normal workers may be repeatedly exposed day after day without adverse effect.

Work area - a room or defined space in a facility where hazardous chemicals are stored or used and where one or more employees are present.

Workplace - see Facility.

Workplace Chemical List - see Facility Chemical List.

Responsibilities

A written hazard communication program shall be developed, implemented and maintained at each BTI workplace. The program shall describe how labels, other forms of warning and material safety data sheets shall be communicated to employees.

The Safety Manager is responsible for developing and implementing the Hazard Communications Program. Managers are responsible for maintaining Safety Data Sheets and the Chemical Inventory List for their locations.

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The Service Managers review the SDS files and Chemical Inventory List at each location at least annually to ensure that they are complete and up to date.

Employees are responsible for following the requirements in the Hazard Communication Program, to use proper personal protective equipment, to report containers without labels immediately and to not deface any label.

Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.

All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.

Requirements

Introduction

This Hazard Communication Program was prepared for use by BTI to explain how BTI meets the requirements of the federal Occupational Safety and Health Administration's Hazard Communication Standard (29 CFR 1910.1200). It spells out how BTI will inventory chemicals stored and used, obtain and use material safety data sheets, maintain labels on chemical substances, and train employees about the hazards of chemicals they are likely to encounter on the job.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right.
- Using this information is part of our shared commitment to a safe, healthy workplace.

List of Hazardous Chemicals

BTI maintains a listing of all known hazardous chemicals known to be present used at, or by this facility by using the identity that is referenced on the safety data sheet (SDS). This identity is often a common name, such as the product or trade name (i.e., Lime-A-Way).

The Chemical Inventory List is updated as necessary and at least annually by the Hazard Communication Program Coordinator or their designee.

The facility Chemical Inventory List must be available for review upon request.

Safety Data Sheets

Chemical manufacturers are responsible for developing SDSs. BTI shall have a SDS for each chemical used with the exception of consumer products.

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Safety Data Sheets, for chemicals used in this facility or by personnel reporting to this facility, shall be maintained, readily accessible in each work area and be made available, upon request, to employees, their designated representatives and regulatory officials in accordance with the requirements of 29 CFR 1910.1020(e).

Safety Data Sheets are filed alphabetically, by material classification, in the SDS Book. A Chemical Inventory List is provided in the front of the MSDS Book, listing all MSDS' contained therein. This inventory serves as the index of the MSDS Book. The MSDS Book shall be displayed in a prominent location in the work area where it is accessible to all employees.

MSDS' must be obtained for each required chemical from the chemical manufacturer, supplier or vendor. The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheet in a timely fashion is prohibited.

The Safety Data Sheet must be kept in the SDS library for as long as the chemical is used by the facility.

Electronic access (telephone, fax, internet, etc.) may be used to acquire and maintain SDS libraries and archives.

The service Managers are responsible for seeing that the Chemical Inventory List is maintained, is current and is complete. He will review the inventory and the SDS Book at least annually. When a hazardous material has been permanently removed from the work place, its SDS is to be removed from the SDS Book and the Chemical Inventory List. A file copy is to be maintained in a "dead file".

SDS' for hazardous materials to which BTI employees have been exposed must be maintained after the employee leaves the employment of BTI. Before any non-routine task is performed, employees will be advised of special precautions and the hazards associated with chemicals contained in unlabeled pipes in their work areas, if present. In the unlikely event that such tasks are required, the Manager will provide SDS for involved chemical. Employees have the right to request SDS on any chemical and it must be provided without any issues.

Labels, Labelling and Warnings:

The Manager will ensure that all hazardous chemicals used or stored in the facility are properly labelled.

- Damaged labels or labels with incomplete information shall be reported immediately.
- Damaged labels on incoming containers of chemicals shall not be removed.
- New labels shall be provided as needed so that all containers are properly labelled.
- Only containers into which an employee transfers a chemical for their own immediate use will not require labelling.
- Employees who are unsure of the contents of any container, vessel or piping must contact their supervisor for information regarding the substance including:
 - The name of the substance
 - The hazards related to the substance
 - The safety precautions required for working with the substance.

Labels, tags or markings on containers shall list as a minimum:

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- Words, pictures, symbols or combinations thereof may be used.
- The trade name of the product as listed on the Material Safety Data Sheet.
- Appropriate hazard warnings to help employees protect themselves from the hazards of the substance.
- Labels provided by chemical manufacturers, distributors, and importers must also list the name and address of the manufacturer, importer, or vendor responsible for the chemical, and from whom more information about the chemical can be obtained.
- Labels shall be legible, in English. However, for non-English speaking employees, information shall be presented in their language as well.
- BTI or employees shall not remove or deface labels on incoming containers of hazardous chemicals.

All containers must be labelled. When an employee transfers the contents of one container to another, he must label the new container with all required information. This information can be obtained from the labelling of the original container or from the material's MSDS. Any container of a potentially hazardous material that will not be emptied during one shift must be labelled, without exception.

Managers are responsible for proper labelling of all containers shipped by BTI and for the inspection of all incoming materials to ensure correct labelling. Chemicals received from vendors that are not properly labelled must be rejected.

NFPA Standard 704 labels shall be the preferred hazard identification method used in BTI facilities and on materials containers used on client sites. All employees, clients, subcontractors and visitors who may come in contact with a BTI hazardous substance must be briefed to ensure understanding of the NFPA 704 labelling system.

Training

BTI shall provide employees and new hires at their initial assignment effective information and training on hazardous chemicals in their work area.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. To reinforce the importance of handling chemicals properly when performing new or non-routine tasks, Supervision will conduct supplementary training as needed.

Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.

The Manager shall ensure records of employee training are maintained.

When an outside contractor, such as a pest control worker or a carpenter enters a BTI site to perform a service for the company, he must first present SDS' for any and all hazardous chemicals he will use. These SDS' will be treated as above with the same training requirements. The Manager will be responsible for contacting each contractor before work is started to gather and disseminate any information concerning chemical hazards the contractor is bringing into the work place.

The Hazard Communication Program documented training shall, as a minimum, include:

- Requirements, details and rights of the employee as contained in the Hazard Communication regulation

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- Operations and work areas where hazardous chemicals are present.
- Location of the written Hazard Communication Program, SDSs and the Chemical Inventory List.
- How to access SDS' or SDS information.
- How to read and an explanation of labels and Safety Data Sheets for pertinent hazard information and how employees can obtain and use the appropriate hazard information.
- Methods and observations that may be used to detect the presence or release of hazardous chemicals by use of monitoring devices, visual appearance or odor.
- The physical & health hazards of chemicals in the work area.
- Protection measures to be utilized to prevent exposure.
- Appropriate work practices.
- Emergency procedures.
- Proper PPE to be used.

Multi-Employer Job Sites/Multi-Work Site

Multi-Work Sites

Where employees must travel between work places during a work shift, the written HAZCOM Program shall be kept at a primary job site. If there is no primary job site, then the program shall be sent with employees.

The program shall be made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director in accordance with requirements of 29 CFR 1910.1020(e).

Hazard Warnings / NFPA 704

The NFPA 704 Diamond is a means of disseminating hazard warning and information for a material. The diamond is divided into four sections. Each of the first three colored sections has a number in it associated with a particular hazard. The higher the number is, the more hazardous a material is for that characteristic. The fourth section includes special hazard information. The four sections and an explanation of the numbers in them are provided below:

NFPA Rating Explanation Guide					
RATING NUMBER	HEALTH HAZARD	FLAMMABILITY HAZARD	INSTABILITY HAZARD	RATING SYMBOL	SPECIAL HAZARD
4	Can be lethal	Will vaporize and readily burn at normal temperatures	May explode at normal temperatures and pressures	ALK	Alkaline
3	Can cause serious or permanent injury	Can be ignited under almost all ambient temperatures	May explode at high temperature or shock	ACID	Acidic
2	Can cause temporary incapacitation or residual injury	Must be heated or high ambient temperature to burn	Violent chemical change at high temperatures or pressures	COR	Corrosive
1	Can cause significant irritation	Must be preheated before ignition can occur	Normally stable. High temperatures make unstable	OX	Oxidizing
0	No hazard	Will not burn	Stable	Radioactive Symbol	Radioactive
				W	Reacts violently or explosively with water
				W OX	Reacts violently or explosively with water and oxidizing

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Purpose

The purpose of this program is to establish procedures for affixing appropriate lockout/tagout equipment to energy isolating devices and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy to prevent injury or incident.

Scope

This program covers the servicing and maintenance of machines and equipment where the unexpected energization or start up of the machine or equipment, or the release of stored energy could cause an incident. This program establishes minimum performance requirements for the control of such hazardous energy. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected employee - An employee whose job requires them to operate or use a machine or equipment on which servicing and maintenance is being performed under lockout/tagout, or whose job requires the employee to work in an area in which such servicing or maintenance is being performed.

Authorized employee - A person that performs lockout/tagout procedures on machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes authorized when that employee's duties include performing servicing or maintenance covered under this program.

Capable of being locked out - An energy isolating device is capable of being locked out if it has a hasp or other means of attachment to which, or through which, a lock can be affixed, or it has a locking mechanism built into it. Other energy isolating devices are capable of being locked out if lockout can be achieved without the need to dismantle, rebuild or replace the energy isolating device or permanently alter its energy control capability.

Energized - Connected to an energy source or containing residual or stored energy.

Energy isolating device - A mechanical device that physically prevents the transmission or release of energy including, but not limited to, the following:

- A manually operated electrical circuit breaker, a disconnect switch, a manually operated switch by which the conductors and no pole can be operated independently, a line valve, a block and any similar device used to block or isolate energy.
- Push buttons, selector switches and other control circuit type devices are not isolating devices.

Energy source - Any source of gas, electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy sources.

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Lockout - The placement of a lockout device on an energy isolating device in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Lockout device - A device that utilizes a positive means, such as either a key or combination type lock, to hold an energy isolating device in the safe position and prevent the energizing of a machine or equipment.

Normal operation - The utilization of a machine or equipment to perform its intended operation.

Servicing and/or maintenance - Workplace activities such as constructing, setting up, adjusting, inspecting, modifying and maintaining and/or servicing machines and equipment, where the employee may be exposed to an unexpected energization or startup of the equipment or release of a hazardous energy source.

Tagout: - The placement of a tagout device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout device - A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until tagout device is removed.

Key Responsibilities

Managers and Supervisors

- Responsible to control and enforce this plan and to see that all their employees and contractors that are affected by lockout/tagout procedures, have the knowledge and understanding required for safe application, usage, and removal of all energy controls and devices.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Employees who are affected by this program are required to attend training on an annual basis.
- Are required to follow the provisions of this program.

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Procedure

General

Only an authorized employee or employees performing the servicing or maintenance shall perform lockout or tagout.

Devices

Lockout Device - If an energy source can be locked out a device that utilizes a lock to hold an energy isolating device in a safe position shall be used.

Tagout Device – If an energy source cannot be locked out with a lockout device then a tagout device shall be used. Tagout devices are a warning only level of protection and shall be weather and chemical resistant, standardized in color with clear written warning of hazardous energy; i.e. Do Not Operate, Do Not Start, Do Not Energize, etc.

Specific Sequence for Application of Energy Control

1. Notification

Authorized employees must notify all other affected employees of the application and removal of lockout/tagout devices. Notification shall be given before the controls are applied and before they are removed from the machine or equipment.

2. Preparation for Shutdown

Before an authorized or affected employee shuts down a machine or equipment, the authorized employee shall have the knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means (locks) to control the energy sources.

3. Machine or Equipment Shutdown

The machine or equipment shall be shut down using the procedures established for that machine or piece of equipment. The shutdown shall be orderly to avoid any addition hazards to employees as a result of the stoppage.

4. Machine or Equipment Isolation

All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

5. Lockout/Tagout Devices and Application

- Each authorized employee shall have the proper number of locks and devices to be able to perform proper lockout/tagout procedures for machines or equipment that they may be working on.
- Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
- Each lockout and tagout devices shall include the name of the individual placing the device.
- Lockout devices shall be affixed in a manner to hold the energy isolating devices in a safe or off position.
- Tagout devices shall be affixed in a manner that will clearly indicate that the operation or movement of isolating devices from the safe or off position.
- Tagout devices used with energy isolating devices with the capability of being locked out shall be fastened at the same point at which the lock would have been attached. If a tag cannot be directly attached to the

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energy isolation device it shall be located as close as safely as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.

- Each energy source shall be locked out completely isolating the equipment.
- Isolating machines or equipment shall include, but are not limited to:
 - Pumps, compressors, generators, electric distribution, storage tanks, etc.
 - Each type of equipment to be isolated shall have specific procedures for isolation, i.e. for compressors: suction, discharge, power, starting, fuel, dumps shall be closed, locked and tagged out properly. The blow-down valve shall be opened, locked and tagged out properly. (NOTE): If compressor has a side stream hooked up, the side stream shall be closed, locked and tagged out properly.

6. Stored Energy and the Possibility of Reaccumulation

Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained and otherwise rendered safe.

If there is a possibility of re-accumulation of stored energy, verification of isolation shall be continued until the servicing or maintenance operation is completed, or until the possibility of such accumulation no longer exists.

7. Verification of Isolation

The authorized employees performing the lockout procedure verifies/ensures that the equipment is isolated or disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the machine or equipment by operating the control(s) or by testing to make certain the equipment will not operate.

Multiple Workers

A crew of authorized employees may use a group lockout or tagout device. This will afford the group of employees a level of protection equal to that provided by a personal lockout or tagout device.

- A tailgate meeting shall be conducted to review the lockout procedures and other information as required for safe work to continue – all crafts and effected departments shall be involved.
- An authorized employee will isolate the equipment and ascertain the exposure status of individual group members.
- All workers will then place their individual locks on the device's group lockout or tagout device after they have verified the procedure.
- The crew leader or an assigned authorized employee shall be responsible of assuring the continuity of the lockout procedures including documenting lockout information passed along during a shift or personnel changes.

Release from Lockout/Tagout

When servicing or maintenance is completed or when Lockout / Tagout devices must be temporarily removed, the equipment requires testing and the machine or equipment is ready for testing or to return to normal operating conditions, the following steps shall be taken, in this order:

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- Check the machine or equipment and the immediate area surrounding the machine or equipment to ensure that all nonessential items such as tools have been removed and that the machine or equipment components are operationally intact.
- Check the work area to ensure that all personnel have been safely positioned or removed from the area.
- Remove the Lockout/Tagout device
- Energize and proceed with testing
- Deenergize and reapply control methods including Lockout / Tagout devices
- Document the procedure by use of the completed isolation log and provide to supervisor for filing.

Removal of Locks

The authorized employee who applied the lock shall be the one to remove their lock. However, after all work has been completed, certain conditions may arise which prohibit this person from being present to remove the lock.

The following procedures shall be followed to allow for the removal of a lock that another person has applied:

- Every effort shall be made to contact the authorized employee who applied the lock to obtain the key(s).
- If the key(s) cannot be made available, the employee who requests removal of the lock shall contact their supervisor.
- The supervisor shall verify that every effort was made to contact the original authorized employee who applied the lock and to obtain the key(s).
- The employee removing the lock shall note on the Service Report that the lock(s) were removed with permission by supervisor.
- All reasonable efforts will be made by supervisor to notify that employee their lock has been removed, ensuring that the authorized employee has this knowledge before they return to work.
- If the equipment is client owned, the supervisor or employee requesting to remove the lock(s) shall contact the client to get the lock removed. Clients must remove their lock(s).
- NOTE: BTI employees shall not remove any client locks.

Shift or Personnel Changes

In the event shift or personnel changes occur during maintenance and/or repair activities, the designated BTI employee in charge shall take the necessary steps to maintain the continuity of the lockout/tagout protection. This includes maintaining that all provisions in this procedure are adhered to and the transfer of lockout/tagout devices between authorized employees is accomplished.

Contractors

Contractors performing lockout procedures on BTI property shall comply with this procedure. Contractors shall supply their own locks.

BTI shall initially lockout BTI machines and equipment before the contractor will be allowed to apply their own lock in addition to the BTI's.

Annual Audits

Each year the manager or supervisor, or his representative, will perform an inspection of the Lockout Program in their respective areas to verify the effectiveness of the program. An authorized employee other than the one(s) utilizing the energy control procedure being inspected shall perform the audit and shall verify that:

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- Each authorized and/or affected employee has been trained as required.
- Any new equipment added has specific lockout procedures developed and documented.
- Current procedures are adequate for performing complete isolation of equipment and resulting in a zero energy state.
- The annual audit will be certified in writing and a copy of the audit maintained on file at the managers/supervisors office.

TRAINING

BTI shall provide training to ensure that the purpose and function of the energy control program are understood by authorized employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:

- The recognition of applicable hazardous energy (lockout/tagout) sources, the type of the energy available in the workplace, and the methods and means necessary for energy isolation and control.
- The purpose and use of energy control procedures.
- When tagout systems are used, employees shall also be trained in the following limitations of tags:
 - Tags are essentially warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock.
 - 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.
 - 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.
 - Tags and their means of attachment must be made of materials which will withstand the environmental conditions encountered in the workplace.
 - Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.
 - Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program.

All other employees whose work operations are or may be in an area where energy control procedures may be utilized, shall be instructed about the procedure, and about the prohibition relating to attempts to restart or reenergize machines or equipment which are locked out or tagged out.

Retraining

Retraining shall be conducted whenever a periodic inspection reveals, or whenever BTI has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

The retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary.

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Training Documentation

BTI shall certify that employee training has been accomplished and is being kept up to date. The certification shall contain each employee's name and dates of training.

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ISOLATION LOG

Date of Isolation:

Description of Work:

List of Equipment out of Service:

Necessary Requirements of Clear Isolation:

Authorized Employee Signature: _____

Person Continuing Work Signature: _____

Locks/Tags for GROUP LOCKOUT or Multiple Locks/Tags

Lock # or Tag	Date Installed	Date Removed	Print Name (for Group Lockout)	Signature

(If additional space is needed, please attach an additional page)

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ANNUAL AUDIT OF THE CONTROL OF HAZARDOUS ENERGY PROGRAM

I certify that an audit of the BTI "Control of Hazardous Energy" Program was conducted and that each employee has been trained in the recognition and procedures to lockout equipment they may be required to work on or may be affected by.

I further acknowledge that the current procedure is adequate to safely lockout equipment in this department for servicing and maintenance.

Department: _____

Manager (or representative): _____

Date: _____

Original to file: _____

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Purpose

The purpose of the Electrical Safety program is to set forth procedures for the safe use of electrical equipment, tools, and appliances at BTI.

Scope

This program applies to all BTI employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected Personnel - Personnel who normally use and work with electrical equipment, tools, and appliances, but who do not make repairs or perform lock out/tag out procedures.

Appliances - Electrical devices not normally associated with commercial or industrial equipment such as air conditioners, computers, printers, copiers, coffee pots, microwave ovens, toasters, etc.

Circuit Breaker - A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined over current without injury to itself when properly applied within its rating.

Disconnecting Means - A device, or group of devices, or other means by which the conductors of a circuit can be disconnected from their source of supply.

Disconnecting Switch - A mechanical switching device used for isolating a circuit or equipment from a source of power.

Double Insulated Tool - Tools designed of non-conductive materials that do not require a grounded, three wire plug.

Ground - Connected to earth or some conducting body that serves in place of the earth.

Grounded Conductor - A conductor used to connect equipment or the grounded circuit of a wiring system to a grounding electrode or electrodes.

Ground Fault Circuit Interrupter (GFCI) - A device whose function is to interrupt the electric circuit to the load when a fault current to ground exceeds some predetermined value that is less than that required to operate the over current protective device of the supply circuit. BTI shall use GFCIs in lieu of an assured grounding program.

Insulated - A conductor encased within material of composition and thickness that is recognized as electrical insulation.

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Premises Wiring - That interior and exterior wiring, including power, lighting, control, and signal circuit wiring together with all of its associated hardware, fittings, and wiring devices, both permanently and temporarily installed, which extends from the load end of the service drop, or load end of the service lateral conductors to the outlet (s). Such wiring does not include wiring internal to appliances, fixtures, motors, controllers, motor control centers, and similar equipment.

Qualified Person - One that has been trained in the repair, construction and operation of electrical equipment and the hazards involved.

Strain Relief - A mechanical device that prevents force from being transmitted to the connections or terminals of a cable or extension cord.

Class I Locations - Are those in which flammable gases or vapors are or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures.

Class 1 Division 1 - Is a location (a) in which hazardous concentrations of flammable gases or vapors may exist under normal operating conditions; or (b) in which hazardous concentrations of such gases or vapors may exist frequently because of repairs or maintenance operations or because of leakage; or (c) in which a breakdown or faulty operation of equipment or processes might release hazardous concentrations of flammable gases or vapors, and might also cause simultaneous failure of electrical equipment.

Class 1 Division 2 - Is a location (a) in which volatile flammable liquids or flammable gases are handled, processed, or used, but in which the hazardous liquid, vapors, or gases will normally be confined within closed containers or closed systems from which they can escape only in case of accidental rupture or breakdown of such containers or systems, or in of abnormal operation of equipment or (b) in which hazardous concentrations of gases or vapors are normally prevented by positive mechanical ventilation, and which might become hazardous through failure or abnormal operations of the ventilating equipment; or (c) that is adjacent to a Class 1, Division 1 location, and to which hazardous concentrations of gases or vapors might occasionally be communicated unless such communication is prevented by adequate positive-pressure ventilation from a source of clean air, and effective safeguards against ventilation failure are provided.

Class II locations - Class II locations are those that are hazardous because of the presence of combustible dust. Class II locations include the following:

Class II, Division 1 - A Class II, Division 1 location is a location (a) in which combustible dust is or may be in suspension in the air under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures; or (b) where mechanical failure or abnormal operation of machinery or equipment might cause such explosive or ignitable mixtures to be produced, and might also provide a source of ignition through simultaneous failure of electric equipment, operation of protection devices, or from other causes, or (c) in which combustible dusts of an electrically conductive nature may be present.

NOTE: This classification may include areas of, areas where metal dusts and powders are produced or processed, and other similar locations that contain dust producing machinery and equipment (except where the equipment is dust-tight or vented to the outside).

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- These areas would have combustible dust in the air, under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures.
- Combustible dusts that are electrically nonconductive include dusts produced in the handling and processing produce combustible dusts when processed or handled.
- Dusts containing magnesium or aluminum are particularly hazardous and the use of extreme caution is necessary to avoid ignition and explosion.

Class II, Division 2 - A Class II, Division 2 location is a location in which: (a) combustible dust will not normally be in suspension in the air in quantities sufficient to produce explosive or ignitable mixtures, and dust accumulations are normally insufficient to interfere with the normal operation of electrical equipment or other apparatus; or (b) dust may be in suspension in the air as a result of infrequent malfunctioning of handling or processing equipment, and dust accumulations resulting there from may be ignitable by abnormal operation or failure of electrical equipment or other apparatus.

NOTE: This classification includes locations where dangerous concentrations of suspended dust would not be likely but where dust accumulations might form on or in the vicinity of electric equipment. These areas may contain equipment from which appreciable quantities of dust would escape under abnormal operating conditions or be adjacent to a Class II Division 1 location, as described above, into which an explosive or ignitable concentration of dust may be put into suspension under abnormal operating conditions.

Responsibilities

Managers/Supervisor

The Safety Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Service Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations.

Service Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees shall be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

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Safe Work Practices

Inspections

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, and drop lights.
- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

Repairs

- Only Qualified Personnel, who have been authorized by the department supervisor or manager, may make repairs to supply cords on electrical tools and to extension cords.
- Employees shall not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.
- Employees shall not wear conductive apparel such as rings, watches, jewelry, etc. (unless they are rendered non-conductive by covering, wrapping, or other insulating means) while working on or near open energized equipment this includes batteries on trucks, forklifts, phone backup systems or other such equipment.
- If employees are subject to handle long dimensional conductor objects (ducts or pipes), steps for safe work practices shall be employed to ensure the safety of workers.

Extension Cords

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords shall be plugged into one of the following:
 - A GFCI outlet;
 - A GFCI built into the cord;
 - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.

Documented Inspection Frequency – All required inspections shall be performed with the following frequency:

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- Before first use;
- Before equipment is returned to service following any repairs;
- Before equipment is used after any incident that can be reasonably suspected to have caused damage; and
- At intervals not to exceed 3 months, except that cord sets and receptacles that are fixed and not exposed to damage shall be tested at intervals not to exceed six months.

All inspections shall be documented to identify each cord set and plug-connected equipment that passed the test, the date of the test and the individual responsible for the test. Records shall be made available at each job site for inspection by employees and OSHA.

All tested cord sets and cord and plug-connected equipment shall be marked, one or both ends, with colored tape to denote the month that the tests were performed. The below color code chart that must be followed for marking.

Quarter	Month	Color of Tape to Apply to Cords
1	Jan/Feb/March	Green
2	April/May/June	Red
3	July/Aug./Sept.	Orange
4	Oct./Nov./Dec.	White
		Start over with Red and repeat

Outlets

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

Multiple Outlet Boxes

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

Double Insulated Tools

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.

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- Double insulated tools must not be altered in any way, which would negate the factory rating.

Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

Ladders

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders they shall be free from any moisture, oils, and greases.

Energized and Overhead High Voltage Power Lines & Equipment

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.
- Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current).

Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source .
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

Enclosures, Breaker Panels, and Distribution Rooms

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have “Danger: High Voltage – Authorized Personnel Only” posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

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Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with the live parts) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.
- Per BTI policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using BTI's Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by the HSE Manager, Shop Foreman or Branch Manager. Designated employees in some branches may be trained by local management to lock out equipment. If live sources are to be worked it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow BTI Control of Hazardous Energy – Lock out/Tag Out Program.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

Contractors

- Only approved, certified, electrical contractors may perform construction and service work on BTI or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.

Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

Electric Shock-CPR:

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

Electric Welders

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.

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- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

Equipment Grounding

- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

Assured Grounding

OSHA requires that employers shall use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- BTI shall use GFCI's in lieu of an assured grounding program.

Ground Fault Circuit Interrupters

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords shall use a GFCI.
- Additionally, approved GFCI's shall be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

Training

All regular full time and temporary employees will be trained in Electrical Safety utilizing the BTI Electrical Safety Training course or an approved equivalent.

Employees who face a risk of electric shock, but who are not qualified persons, shall be trained and familiar with electrically related safety practices.

Employee shall be trained in safety related work practices that pertain to their respective job assignments.

Employees shall be trained on clearance distances.

Safe work practices shall be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of this program is to provide requirements to eliminate all injuries resulting from possible malfunctions, improper grounding and/or defective electrical tools. This program applies to all sites, employees and contractors and shall be used on owned premises.

Definitions

Competent Person - one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Ground Fault Circuit Interrupter - a device for the protection of personnel that functions to de-energize a circuit or portion thereof within an established period of time when a current to ground exceeds some predetermined value that is less than that required to operate the overcurrent protective device of the supply circuit.

Responsibilities

Supervisors are designated as competent persons for the Assured Equipment Grounding Conductor Program and are responsible for implementation.

Employees are responsible for following the requirements of this program, to perform visual inspections and to take defective equipment out of service.

Procedure

Assured Grounding

OSHA requires that employers shall use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- BTI shall use GFCI's in lieu of an assured grounding program.

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Assured Equipment Grounding Conductor Program

The Assured Equipment Grounding Conductor Program (AEGCP) shall cover all cord sets, receptacles not a part of the permanent wiring of a structure and equipment connected by cord and plug on all construction and maintenance sites.

This written description of the program shall be kept at the jobsite for inspection and copying by OSHA and any affected employee.

Removing Equipment:

- All equipment found damaged or defective or which fails any of the prescribed inspections or tests may not be used until repaired or replaced. All defective or failed equipment must be tagged with a red "do not operate tag" until repaired and tested or rendered unusable and discarded.

Daily Visual inspections – The following shall be visually inspected before each day's use for external defects (such as deformed or missing pins or insulation damage) and for indication of possible internal damage:

- Cord sets;
- Attachment caps;
- Plug and receptacle of cord sets;
- Any equipment connected by cord and plug; and
- Damaged items shall not be used until repaired or discarded.

Continuity Testing – Testing must ensure continuity and electrically continuous. The tester shall use either a continuity tester or an ohmmeter for testing equipment grounding conductors on the following:

- All cord sets;
- Receptacles that are not a part of the permanent wiring of the building or structure; and
- All plug-connected equipment required to be grounded.

Grounding Conductor Testing – The tester shall use either a continuity tester or an ohmmeter for testing. Each receptacle and plug of the following shall be tested for correct attachment of the equipment grounding conductor and the equipment grounding conductor shall be connected to its proper terminal:

- All cord sets;
- Receptacles that are not a part of the permanent wiring of the building or structure; and
- All plug-connected equipment required to be grounded.

Test Frequency – All required tests shall be performed with the following frequency:

- Before first use;
- Before equipment is returned to service following any repairs;
- Before equipment is used after any incident that can be reasonably suspected to have caused damage; and

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- At intervals not to exceed 3 months, except that cord sets and receptacles that are fixed and not exposed to damage shall be tested at intervals not to exceed six months.

All tests shall be documented to identify each receptacle, cord set and cord and plug-connected equipment that passed the test, the date of the test and the individual responsible for the test. Records shall be made available at each job site for inspection by employees and OSHA.

All tested cord sets and cord and plug-connected equipment shall be marked, one or both ends, with colored tape to denote the month that the tests were performed. The below color code chart that must be followed for marking.

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Purpose

The purpose of this program is to ensure the safety of all employees and contractors working for BTI, and to comply with all federal and state requirements that pertain to confined spaces.

Scope

This program covers all employees and other workers that may be involved in confined space entry. When work is performed on a non-owned or operated site, the operator's program shall take precedence. This document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Acceptable entry conditions - the conditions that must exist in a confined space to allow entry and to ensure that employees involved with a confined space entry can safely enter into and work within the space.

Attendant - an individual stationed outside one Confined space who monitors the authorized Entrants and who performs all Attendant's duties assigned in the BTI Confined Spaces Program. Attendants must have sufficiently completed and fully understands the Confined Space training and is approved by BTI to work in a confined space as an Attendant.

Authorized Entrant - an individual who is authorized by BTI to enter a confined space. Entrants must have sufficiently completed and fully understands the Confined Space training and is approved by the Safety Manager to work in a confined space as an Authorized Entrant.

Blanking or Blinding - the absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.

Confined Space

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Double block and bleed - the closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.

Emergency - any occurrence (including any failure of hazard control or monitoring equipment) or an event internal or external to the confined space that could endanger Entrants.

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Engulfment - the surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

Entry - the action by which a person passes through an opening into a confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the Entrant's body breaks the plane of an opening into the space.

Entry permit - the written or printed document that is provided by BTI to allow and control entry into a confined space that contains the information specified in this program.

Entry Supervisor - the person responsible for determining if acceptable entry conditions are present at a confined space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section.

- Entry Supervisors must have sufficiently completed and fully understands the Confined Space training and is approved by the HSE Manager to work in a confined space.
- An Entry Supervisor also may serve as an Attendant or as an authorized Entrant, as long as that person is trained and equipped as required by this section for each role he or she fills. Also, the duties of Entry Supervisor may be passed from one individual to another during the course of an entry operation.
- The Entry Supervisor is responsible to test and monitor the atmosphere conditions.

Hazardous atmosphere - an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a confined space), injury, or acute illness from one or more of the following causes:

- Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL), (0% is normal).
- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent, (20.9 % is normal).
- Any other atmospheric condition that is immediately dangerous to life or health. (Ex.-H2S 10%, 0% is normal).
- Note: For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Material Safety Data Sheets that comply with the Hazard Communication Standard, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

Hot work permit - the written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.

Immediately dangerous to life or health (IDLH) - any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a confined space.

- Note: Some materials -- hydrogen fluoride gas and cadmium vapor, for example -- may produce immediate transient effects that, even if severe, may pass without medical attention, but are followed by

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sudden, possibly fatal collapse 12-72 hours after exposure. The victim "feels normal" from recovery from transient effects until collapse. Such materials in hazardous quantities are considered to be "immediately dangerous to life or health".

Inerting - the displacement of the atmosphere in a permit space by a non-combustible gas (such as nitrogen) to such an extent that the resulting atmosphere is non-combustible. This procedure produces an IDLH oxygen deficient atmosphere.

Isolation - the process by which a confined space is removed from service and completely protected against the release of energy and material into the space by such means as: blanking or blinding; misaligning or removing sections of lines, pipes, or ducts; a double block and bleed system; lockout or tagout of all sources of energy; or blocking or disconnecting all mechanical linkages.

Line Breaking - the intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive, or toxic material, an inert gas, or any fluid at a volume, pressure, or temperature capable of causing injury.

Non-Permit Confined Space - A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

Oxygen deficient atmosphere - an atmosphere containing less than 19.5 percent oxygen by volume.

Oxygen enriched atmosphere - an atmosphere containing more than 23.5 percent oxygen by volume.

Permit-Required Confined Space - a confined space that has one or more of the following characteristics:

- Contains or has a potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an Entrant.
- Has an internal configuration such that an Entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section.
- Contains any other recognized serious safety or health hazard.

Permit system - the employer's written procedure for preparing and issuing permits for entry and for returning the confined space to service following termination of entry.

Prohibited condition - any condition in a confined space that is not allowed by the permit during the period when entry is authorized.

Rescue service - the personnel designated to rescue employees from Permit-Required Confined Spaces.

Retrieval system - the equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from confined spaces.

Testing - the process by which the hazards that may confront Entrants of a confined space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

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Responsibilities

Service Managers/Supervisor

- Shall ensure that all employees have been trained and fully understand the requirements of this program.
- Shall provide the necessary equipment to comply with these requirements and ensure that all employees are trained on its use.
- Shall ensure that all confined space assessments have been conducted and documented.
- Shall ensure that provisions and procedures are in place for the protection of employees from external hazards including but not limited to pedestrians, vehicles and other barriers and by use of the pre-entry checklist verifying that conditions in the permit space are acceptable for entry during its duration.
- Shall ensure that all Permit-Required Confined Spaces permits are posted.
- Shall ensure an annual review of the program including all entry permits issued that during that annual period.
- Shall ensure that confined spaces are identified properly as either a Non-Permit Confined Space or a Permit-Required Confined Space.
- Shall ensure that all on site confined spaces that have been identified as “no entry” have signs that state, “DANGER- DO NOT ENTER”.
- Shall ensure signs have been posted at all on site Permit-Required Confined Space areas that state, “DANGER – PERMIT ENTRY CONFINED SPACE” along with the proper warning word such as “ASPHYXANT, FLAMMABILITY or TOXIC HAZARD”
- Shall file all permits at the office for review. Permits shall be kept on file for one year.

Affected Employee

- Shall attend Confined Space Entry training commensurate with their duties and when duties change as required.
- Shall comply with all aspects of this program.
- Authorized Entrants, Attendants and Entry Supervisors may be any BTI employee that is authorized by management to work in a confined space setting and that has been trained and is proficient in the understanding of program requirements.

Authorized Entry Supervisor Duties

- Shall have a tailgate safety meeting, with all workers to be involved in the confined space entry and review the job to be performed and what safety concerns may be present.
- Shall confirm that all isolation, Lock/out and Tag/outs have been completed prior to entry into a confined space.
- Shall ensure that the requirements of this program are followed and maintained.
- Shall test all atmosphere conditions prior to entry and shall complete and maintain the confined space permit form, and have it accessible for review on the job site at all times.
- Shall notify BTI supervisor of entry into a confined space, and notify the supervisor of any changes that may occur, during an entry.

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- If the confined space poses a hazard that cannot be eliminated, the Entry Supervisor must arrange for a means of communication to be in place and operable to summon rescue services.
- If the confined space poses no hazards to the Entrants, the Entry Supervisor can reclassify the confined space to a Non-Permit Confined Space.
- A stand-by rescue team is not required to be on site for Non-Permit Confined Space entries.

Authorized Attendant Duties

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Is aware of possible behavioral effects of hazard exposure in authorized Entrants.
- Continuously maintains communication and an accurate count of authorized Entrants in the confined space and ensures that the means used to identify authorized Entrants, and accurately identifies who is in the confined space.
- Remains outside the confined space during entry operations until relieved by another Attendant.
- Attendants are NOT allowed to monitor more than one confined space. Attendants should concentrate on one confined space.
- Note: Attendants may enter a confined space to attempt a rescue, if they have been trained and equipped for rescue operations as required and only when they have been relieved by another authorized Attendant.
- Monitors activities inside and outside the confined space to determine if it is safe for Entrants to remain in the space and orders the authorized Entrants to evacuate the confined space immediately under any of the following conditions:
 - If the Attendant detects a prohibited condition;
 - If the Attendant detects the behavioral effects of hazard exposure in an authorized Entrant;
 - If the Attendant detects a situation outside the space that could endanger the authorized Entrants;
 - If the Attendant cannot effectively and safely perform all the duties required.
- Summon rescue and other emergency services as soon as the Attendant determines that authorized Entrants may need assistance to escape from confined space hazards.
- Takes the following actions when unauthorized persons approach or enter a confined space while entry is underway:
 - Warn the unauthorized persons that they must stay away from the confined space;
 - Advise the unauthorized persons to exit the confined space immediately, if they have entered the space;
 - Inform the authorized Entrants and the Entry Supervisor if unauthorized persons have entered the confined space.
- Performs no duties that might interfere with the Attendant's primary duty to monitor and protect the authorized Entrants.
- Authorized Attendants shall not monitor more than one confined space at a time.

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Authorized Entrant Duties

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Uses appropriate personal protective equipment properly, e.g., face and eye protection, and other forms of barrier protection such as gloves aprons, coveralls, and breathing equipment;
- Is aware of possible behavioral effects of hazard exposure in authorized Entrants;
- Shall witness and verify calibrated air monitoring data and if approved, sign off, before entry is made.
- Is entitled to request additional monitoring at any time.
- Maintain communication with the Attendants to enable the Attendant to monitor the Entrants status as well as to alert the Entrant to evacuate if needed; and
- Exit from confined spaces as soon as possible when ordered by an Attendant or Entry Supervisor, when the Entrant recognizes the warning signs or symptoms of an exposure exists, or when a prohibited condition exists, or when an alarm is activated.

Procedure

Non-Permit Confined Space Entry

If testing of the confined space atmosphere is within acceptable limits without the use of forced air ventilation and the space is properly isolated, the space can be entered by following the requirements for Level I confined space entry.

- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.

Employees may enter and work in the confined space as long as LEL, O2, and toxicity hazards remain at safe levels.

- Complete the BTI Confined Space Entry Permit to document that there are no confined space hazards. Make this certification available to all personnel entering the space.
- A trained Attendant must always be outside the confined space. The Attendant must monitor the authorized Entrants for the duration of the entry operation.

Exception: The Attendant requirements and arrangement for rescue service for confined space entry may be exempted, if the job assessment is performed and has determined that there are no inherent dangers to allow single person entry.

- This provision is intended to permit field operations to enter pits, etc. without an Attendant being present and all other aspects of the entry permit complied with.
- When there are changes in the use and configuration of a confined space that might increase the hazards to the Entrants (e.g., using epoxy coating on a tank floor, welding, painting, etc.), re-evaluate the space. If necessary, reclassify the space as a Permit-Required Confined Space.
- Continuously monitor the confined space atmosphere to ensure that it is still safe.
- The space must not contain a hazardous atmosphere while personnel are inside.

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- If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
- Re-evaluate the space to determine how the hazardous atmosphere developed.
- The Entry Supervisor shall cancel the entry permit.
- Take action to protect personnel before any subsequent activity to re-enter the space takes place.
- Reissue the BTI Confined Space Entry Permit before allowing Entrants to re-enter the space.
- If necessary, reclassify the space as a Permit-Required Confined Space.
- Ensure that vehicle or other equipment exhaust does not enter the space.

Permit-Required Confined Space Entry

If the space is properly isolated and results of air monitoring are above acceptable parameters without local exhaust ventilation in operation, classify the entry as a Permit-Required Confined Space.

- Complete the BTI Confined Space Entry Permit before proceeding with work in a Permit-Required Confined Space.
- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.
- At least one trained Attendant must always be outside the Permit-Required Confined Space.
- The Attendant must monitor the authorized Entrants for the duration of the entry operation.
- Only authorized Entrants may enter a Permit-Required Confined Space.
- All Entrants must sign in and out on the entry permit when entering and leaving a Permit-Required Confined Space.
- The back of the permit or a sign-in sheet must be used for this purpose.
- Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited.
- Conditions must be continuously monitored where Entrants are working to determine that acceptable conditions are maintained during entry.
- If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
 - The Entry Supervisor shall cancel the entry permit.
 - Re-evaluate the space to determine how the hazardous atmosphere developed.
 - Take action to protect personnel before any subsequent activity to re-enter the space takes place.
 - Re-issue the BTI Confined Space Entry Permit before allowing Entrants to re-enter the space.
 - Employees or their representatives are entitled to request additional monitoring at any time.
- The permit must be terminated when the entry operations are complete or when permit conditions change (i.e., hazardous air monitoring results are noted, unsafe behaviors are observed, etc.).
- The minimum rescue equipment required for Permit-Required Confined Space entry is covered in the Rescue & Emergency section of this program.
- Permit-Required Confined Space entry operations will be reviewed when BTI believes that the requirements of this confined space program may not adequately protect personnel.
- If deficiencies are found in the program, the program will be revised and personnel will be trained in the new revisions before subsequent entries are authorized.

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Pre-Job Planning and Space Preparation

The Entry Supervisor must determine that the confined space is properly isolated by blinding, disconnecting, and/or by following local Lockout/Tagout procedures.

The Entry Supervisor must discuss with all Entrants the hazards of the space, communication methods and emergency procedures during the confined space entry.

Eliminate any condition making it unsafe to open the equipment to atmosphere.

Promptly guard the opening to prevent an accidental fall through the opening and to protect each employee working in the space from foreign objects entering the space.

If applicable, wash, steam, ventilate or degas the confined space to properly free it of possible contaminants. Vent vapors to a safe location.

Do not allow unauthorized personnel to enter a confined space. Barricade and/or guard all confined spaces to prevent entry of unauthorized Entrants.

If performing hot work in the confined space, precautions must be taken consistent with the BTI Hot Work Permit procedure.

Ensure that vehicle or other equipment exhaust does not enter the space.

Pre-Entry Safety Meeting

The Entry Supervisor must declare when the confined space is ready for entry.

The Entry Supervisor shall hold a pre-entry safety meeting to discuss all requirements and procedures with all authorized Entrant(s) and Attendant(s) involved with the entry. He/she will discuss other concerns such as previous contents, vessel coating, PPE required etc., during this meeting.

The Entry Supervisor must coordinate entry operations when employees of more than one company are working simultaneously in the confined space. This coordination is necessary so that one company's work does not endanger the employees of another company.

Equipment

Check all work equipment to ensure that it has the proper safety features and is approved for the locations where it will be used. The Entry Supervisor shall ensure that all equipment is properly maintained in a safe condition and that Entrants use the equipment properly.

The following equipment must be considered and may be required when entering a confined space:

- Atmospheric Testing and Monitoring Equipment.
- Barriers, Shields, and Signs – Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited. Any signs used must state "Danger – Permit Entry Confined Space" along with the proper warning word such as

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“Asphyxiant, Flammability or Toxic Hazard”. All barricades must be capable of preventing a person from inadvertently walking into or kicking an object into the space.

- Communications Equipment – Only use intrinsically safe equipment in areas where a hazardous atmosphere may exist. Use a communication system that will keep the Attendant in constant, direct communication with the Entrant(s) working in the confined space. Also, use a communication system that allows the Attendant to summon help from rescue or emergency service.
- Entry and Exit Equipment – (For example: ladders may be needed for safe entry and exit).
- Lighting Equipment – Needed for safe entry, work within the space and exit. Lighting equipment used in the confined space must be certified safe for the location.
- Portable electric lighting used in wet and/or other conductive locations (drums, tanks, vessels) must be operated at 12 volts or less. 120 volt lights may be used if protected by a ground-fault circuit interrupter.
- Personal Protective Equipment – Ensure that personnel wear the required personal protective equipment. For respiratory protection requirements, refer to the Respiratory Protection Program.
- Rescue and Emergency Equipment – Except if provided by outside rescue services.
- The Attendants must also have an approved first aid kit.
- Ventilating Equipment – Local exhaust air movers used to obtain acceptable atmospheric entry conditions (e.g., Copus air movers).
- Other – Any other equipment necessary for safe entry into and rescue from permit required confined spaces.

Air Monitoring

- Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. Monitoring of the space must inform the entrants of the potential hazards and results and they must participate in the permit review and signing.
- Air shall be periodically test while continuous ventilation is applied.
- Any employee, who enters the space, or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph.
- Employees or their representatives are entitled to request additional air monitoring at any time.

Ventilation

Continuous forced air ventilation must be used and tested as follows:

- An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere;
- The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or will be present within the space and shall continue until all employees have left the space;
- The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.
- The atmosphere within the space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee, who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing and may request additional monitoring at any time.
- If a hazardous atmosphere is detected during entry each employee shall leave the space immediately and the space shall be evaluated to determine how the hazardous atmosphere developed; and measures shall

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be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

Multiple Employer Procedure

In order not to endanger the employees of any other employer, the Entry Supervisor shall:

- Verify that all contractor employees have been trained in confined space and that all contractor employees fully understand the BTI procedures pertaining to Confined Space.
- Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements of this section.
- Apprise the contractor of the elements, including the hazards identified and the employees experience with the space, that make the space in question a permit space.
- Inform the contractor of any precautions or procedures that BTI has implemented for the protection of employees in or near permit spaces where contractor personnel will be working.
- Coordinate entry operations with the contractor, when both BTI personnel and contractor personnel will be working in or near confined spaces.
- Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in confined spaces during entry operations.
- In addition to complying with the confined space requirements that apply to all employees; each contractor, who is retained to perform permit space entry operations, shall:
 - Obtain any available information regarding confined space hazards and entry operations from the BTI Entry Supervisor.
 - Coordinate entry operations with the BTI Entry Supervisor, when both BTI personnel and contractor personnel will be working in or near permit spaces.
 - Inform BTI of the confined space program that the contractor will follow and of any hazards confronted or created in the confined space, either through a debriefing or during the entry operation.

Rescue and Emergency Services

General

- If entry is to be made into an IDLH atmosphere, or into a space that can quickly develop an IDLH atmosphere (if ventilation fails or for other reasons), the trained rescue team or service must be standing by at the permit space while work is being performed.
- In case of an emergency and/or injuries, the confined space site shall be secured and emergency response personnel shall be notified to respond per the host facility emergency plan.
- If there is reliance on host facility or outside services for rescue the facility host or outside rescue team must be given an opportunity to examine the entry site, practice rescue and decline as appropriate. Reliance on host facility for rescue services must be stated and agreed to in contract language.
- The Attendant shall order the other Entrants not to move the injured nor allow untrained or unauthorized workers into the space that are not trained to handle a confined space rescue.
- Material Safety Data Sheet's for substances that an injured Entrant was exposed to must be provided to the medical facility treating the injured worker.

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Permit-Required Confined Space Rescue:

- When the Attendant becomes aware of the need for rescue, the Attendant shall immediately summon the onsite rescue team by the agreed upon communication method, verbally, radio or cell phone, without leaving the vicinity of the confined space.
- The Attendant shall prevent unauthorized personnel from attempting a rescue.
- After the rescue team has been notified, the Attendant shall alert the Entry Supervisor of the emergency via the same communication methods.
- The preferred means of providing rescue service is through the use of a qualified outside rescue service vendor.
- The outside rescue service vendor must be:
 - Informed of the hazards that they may confront during a rescue;
 - Provided access to the Permit-Required Confined Space.
 - Access to the space allows the rescue service and local supervision to jointly develop appropriate rescue plans.
- If BTI employees are to perform Permit-Required Confined Space rescues, they must be:
 - Provided and trained in the use of the proper personal protective equipment necessary to make the rescue;
 - Provided PPE at no cost
 - Trained to perform the assigned duties;
 - Required to practice making rescues at least once every 12 months;
 - Trained in basic first aid and CPR.
 - A minimum of one member of the rescue team must hold a current certification in first aid and CPR.

Non-entry Rescue

- To facilitate non-entry rescue, an Entrant must be attached to a retrieval system whenever he/she enters a Permit-Required Confined Space with a vertical depth of more than 5 feet.
- The retrieval equipment is not required if it will increase the overall risk of the entry, e.g., creating an entanglement hazard, or will not contribute to the rescue of the Entrant.
- Each Entrant shall use a full body harness equipped with a "D" ring located between the shoulders or above the head.
- Wristlets may be used instead of the full body harness, if the use of the full body harness is not feasible or creates a greater hazard *and* that using wristlets is the safest and most effective alternative.
- The retrieval line must be attached to the "D" ring and the other end of the retrieval line attached to a retrieval device or fixed point located outside the space so that rescue can begin as soon as the rescuer becomes aware that rescue is necessary.

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Issuance/Reviewing of Permit

Only when all pre-entry requirements are satisfied, the Entry Supervisor shall issue a completed and signed confined space permit. The confined space permit is valid for one shift.

In the event of any unauthorized entry, employee complaints, a hazard not covered by the permit, the occurrence of an injury or near miss the entry permit shall be cancelled and a review shall be conducted to provide employee protection and for revising the program prior to authorizing subsequent entries.

An annual review of this program, using the cancelled permits retained within 1 year after each entry shall be conducted by the Safety Manager to revise the program as necessary, to ensure that employees are protected. If no confined space entries were performed during a 12 month period, no review is necessary.

Cancellation/Closure of Permits

The Entry Supervisor shall cancel the confined space permit, at the end of the job operation, at the end of the shift or when the Entry Supervisor or Attendant determine that conditions in or near the confined space have changed and is hazardous to the Entrants.

The Entry Supervisor shall, at the conclusion of entry operation, close out the permit and provide the safety department the original copy of the Confined Space Permit.

Training

Training shall be provided so that all employees whose work is regulated by this program acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned to them.

Training shall be provided to each affected employee, before the employee is first assigned duties under this program, if a new hazard has been created or special deviations have occurred and before there is a change in assigned duties.

The employee shall be retrained:

- Whenever there is a change in confined space operations that presents a hazard about which an employee has not previously been trained.
- Whenever the supervisor has reason to believe either that there are deviations from the permit space entry procedures required by this section or that there are inadequacies in the employee's knowledge or use of these procedures.

The training shall establish employee proficiency in the duties required by this program and shall introduce new or revised procedures, as necessary.

The supervisor shall document that the training required by this program has been accomplished.

- The certification shall contain each employee's name, the signatures or initials of the trainers, and the dates of training.
- The certification shall be available for inspection by employees, their authorized representatives, management, clients and the safety department.

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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of this program is to assure a safe work environment during welding, cutting, and hot work operations.

Scope

This program is applicable to all employees directly involved or assisting in the welding, cutting and hot work operations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Operators of equipment should report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured. Repairs shall be made only by qualified personnel. If welding and cutting cannot be conducted safely the welding and cutting operation shall not be performed.

Definitions

Welding/Hot Work Procedures - any activity which results in sparks, fire, molten slag, or hot material which has the potential to cause fires or explosions.

Examples of Hot Work - Cutting, Brazing, Grinding, using an electric tool in a hazardous area and Welding.

Special Hazard Occupancies - any area containing Flammable Liquids, Dust Accumulation, Gases, Plastics, Rubber and Paper Products.

Hazards - includes, but not limited to the following; fires and explosions, skin burns, welding "blindness", and respiratory hazards from fumes and smoke.

Key Responsibilities

Managers and Supervisors

- Determine if its property is safe for welding and cutting operations.
- Establish safe areas for welding and cutting operations.
- Provide training for all employees whose task includes heat, spark or flame producing operations such as welding, brazing, or grinding.
- Develop and monitor effective hot work procedures.
- Provide safe equipment for hot work.
- Provide proper and effective PPE for all hot work.
- Monitor all hot work operations.
- Ensure all hot work equipment and PPE are in safe working order.

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- Allow only trained and authorized employees to conduct hot work and conduct inspections of the hot work area before operations begin.
- Ensure permits are used for all hot work outside authorized areas.

Employees

- Follow all hot work procedures.
- Properly use appropriate hot work PPE.
- Inspect all hot work equipment before use.
- Report any equipment problems or unsafe conditions.

Procedure

General

Before cutting or welding is permitted the area shall be inspected by a BTI employee who has been trained to conduct a proper inspection and granting authorized welding and cutting operations. Precautions that are to be taken shall be in the form of a written Hot Work permit.

Where practicable all combustibles shall be relocated at least 35 feet from the work site. Where relocation is impractical, combustibles shall be protected to help prevent ignition of material.

Ducts, conveyor systems, and augers that might carry sparks to distant combustibles shall be protected or shut down.

Where cutting or welding is done near walls, partitions, or openings in the floor (grating, manholes, etc.), fire-resistant shields or guards shall be provided to prevent ignition.

If welding is to be done on a metal wall, partition, ceiling, or solid decking/flooring, precautions shall be taken to prevent ignition of combustibles on the other side, due to conduction or radiation of heat. Where combustibles cannot be relocated on the opposite side of the work, a fire watch person shall be provided on the opposite side of the work.

Cutting or welding on pipes or other metal in contact with combustible walls, partitions, floors, ceilings, or roofs shall not be undertaken if the work is close enough to cause ignition by combustion.

Cutting or welding shall not be permitted in the following situations:

- In areas not authorized by management.
- In the presence of potentially explosive atmospheres, e.g. flammables.
- In areas near the storage of large quantities of exposed, readily ignitable materials.

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Whenever welding or cutting is performed in locations where other than a minor fire might develop or any of the conditions mentioned above cannot be met, a fire watch shall be provided.

- The fire watch shall be provided during and for a minimum of 1/2 hour past the completion of the welding project.
- The fire watch shall be trained in the use of fire extinguishers and the facility's alarm system.
- During this time the fire watch will have appropriate fire extinguishers readily available.
- Suitable extinguishers shall be provided and maintained ready for instant use.
- A hot-work permit will be issued on all welding or cutting outside of the designated welding area.

Fire Prevention Measures

A designated welding area shall be established to meet the following requirements:

- Floors swept and cleaned of combustibles within 35 feet of work area.
- Flammable and combustible liquids and material will be kept 35 feet from work area.
- At least one 10 pound dry chemical fire extinguisher shall be within access of 35 feet of the work area.
- Protective dividers such as welding curtains or noncombustible walls will be provided to contain sparks and slag to the combustible free area.

Requirements for welding conducted outside the designated welding area:

- Portable welding curtains or shields or appropriate protection must be used to protect other workers in the welding area.
- A hot-work permit must be completed and complied with prior to initiating welding operations.
- Respiratory protection is mandatory unless an adequate airflow away from the welder and others present can be established and maintained.

After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

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Confined Space

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Refer to BTI's Confined Space Program before commencing any welding, cutting, and/or brazing operations in an area meeting the requirements of a confined space.

Ventilation is a prerequisite to work in confined spaces.

When welding or cutting is being performed in any confined spaces, the gas cylinders and welding machines shall be left on the outside. Before operations are started, heavy portable equipment mounted on wheels shall be securely blocked to prevent accidental movement.

When a welder must enter a confined space through a manhole or other small opening, means shall be provided for quickly removing him in case of an emergency.

- When safety belts and lifelines are used for this purpose, they shall be so attached to the welder's body that it cannot be jammed in a small exit opening.
- An attendant with a preplanned rescue procedure shall be stationed outside to observe the welder at all times and be capable of putting rescue operations into effect.

When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur and the machine shall be disconnected from the power source.

In order to eliminate the possibility of gas escaping through leaks of improperly closed valves, when gas welding or capping, the torch valves shall be closed and the fuel-gas and oxygen supply to the torch positively shut off at some point outside the confined area whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. If practical, the torch and hose shall also be removed from the confined space.

All welding and cutting operations carried on in confined spaces shall be adequately ventilated to prevent the accumulation of toxic materials or possible oxygen deficiency. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity. All air withdrawn will be replaced with air that is clean.

Fumes, Gases and Dust

Fumes produced by some welding processes can be toxic and may require source extraction. An assessment of the work to be performed must be completed before each job is undertaken. Fumes generally contain particles from the material being welded. Welding fumes can have an acute effect on the respiratory system.

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Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, beryllium or exotic metals or paints that could produce dangerous fumes shall have proper ventilation or respiratory protection.

Welders and helpers will refer to BTI's Respiratory Protection Program to determine the appropriate respiratory protection to be used during welding operations.

All welding and cutting operations shall be adequately ventilated to prevent the accumulation of toxic materials. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity.

Personal Protection

Helmets and hand shields shall be made of a material, which is an insulator for heat and electricity. Helmets, shields, and goggles shall not be readily flammable and shall be capable of withstanding sterilization.

Helmets and hand shields shall be arranged to protect the face, neck and ears from direct radiant energy from the arc.

All parts shall be constructed of a material, which will not readily corrode or discolor the skin.

Goggles shall be ventilated to prevent fogging of the lenses as much as practicable.

Adequate hand protection and clothing must be used to protect the body from welding hazards.

Cleaning Compounds

In the use of cleaning materials, because of their possible toxicity or flammability, appropriate precautions such as manufacturer instructions shall be followed.

Cylinders

Compressed gas cylinders shall be DOT-approved and legibly marked near the shoulder of the cylinder for the purpose of identifying the gas content with either the chemical or trade name of the gas.

- All compressed gas cylinder connections must comply with ANSI B57. 1-1965 Standards.
- 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.

All cylinders shall be kept away from sources of heat and from radiators and piping systems that may be used for grounding purposes. Cylinders and cylinder valves including couplings and regulators shall be kept free from oily or greasy substances and must not be handled with gloves or rags in the same condition.

Stored oxygen cylinders shall be kept at least 20 feet from the fuel gas cylinders or combustible materials, especially oil or grease, or separated by a non-combustible barrier at least 5 feet high with a fire rating of at least one-half hour. All empty cylinders shall have closed valves. Valve protection caps shall always be in place and hand-tight except when cylinders are in use or connected for use.

Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.

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Fuel gas cylinders stored inside buildings shall be limited to a total capacity of 2000 cubic feet (300 pounds) of liquefied petroleum gas, except for those in actual use or attached ready for use.

All acetylene cylinders shall be stored valve-end up.

Assigned storage spaces shall be located where cylinders cannot be knocked over or damaged by falling objects or subject to tampering by unauthorized persons.

- Back flow protection shall be provided by an approved device that will prevent oxygen from flowing into the fuel-gas system or fuel from flowing into the oxygen system.
- An approved device that will prevent flame from passing into the fuel-gas system shall provide flashback protection.
- An approved pressure-relief device set at the appropriate pressure shall provide backpressure protection.

Special care must be taken when transporting gas cylinders:

- Cylinders must be secured with valve cap installed.
- Cylinders shall not be lifted by the valve protection caps, the regulators must be removed and cylinders shall not be dropped or permitted to strike each other.
- Removed regulators must be properly transported.
- Cylinders shall not be tampered with nor should any attempt be made to repair them.
- They shall be handled carefully - rough handling, knocks, or falls are liable to damage the cylinder, valve or safety device and cause leakage.

Safety devices shall not be tampered with.

Arc Welding and Cutting

All personnel operating, installing, and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

- All workmen assigned to operate or maintain equipment shall be familiar with and electrical welding equipment shall be chosen for safe operation and comply with applicable Requirements for Electric Arc Welding Standards to include: 29 CFR 1910.254, 29 CFR 1910.252 (a)(b) (c) and if gas shielded arc welding is done the must be familiar with the American Welding Society Standard A6-1-1966.
 - Arc welding equipment must be designed to meet conditions such as exposure to corrosive fumes, excessive humidity, excessive oil vapor, flammable gasses, abnormal vibration or shock, excessive dust and seacoast or shipboard conditions.
 - It shall be operated at recommended voltage in accordance to the manufacturer recommendations.
 - All leads shall be periodically inspected and replaced if insulation is broken or splices are unprotected.
 - Leads shall not be repaired with electrical tape.

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- All ground connections shall be checked to determine that they are mechanically strong and electrically adequate for the required current.

A disconnecting switch or controller shall be provided at or near each welding machine along with over current protection.

All direct current machines shall be connected with the same polarity and all alternating current machines connected to the same phase of the supply circuit and with the same polarity.

- To prevent electrical contact with personnel, all electrode holders shall be placed where they do not make contact with persons, conducting objects or the fuel of compressed gas tanks.
- All cables with splices within 10 feet of the holder shall not be used.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

If an object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards shall be used to confine the heat sparks and slag and to protect the immovable fire hazards.

Resistance Welding

All personnel operating, installing, and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

- Voltage, interlocks, guarding, grounding and shields shall be in accordance with manufacturer recommendations.
- Precautions such as flash guarding, ventilation and shields shall be provided to control flashes, toxic elements and metal fumes.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

Oxygen Fuel Gas Welding and Cutting:

Only an approved apparatus such as torches, regulators or pressure-reducing valves, setting generators and manifolds shall be used:

- Mixtures of fuel gases and air or oxygen may be explosive and must be guarded against.
- All hoses and hose connections shall comply with the Compressed Gas Association and Rubber Manufacturers' Associations' applicable standards.
- Workers in charge of the oxygen or fuel-gas supply equipment, including generators, shall be instructed and judged competent by BTI before being left in charge.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

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Fire Watch Requirements

A fire watch shall be under these conditions as a minimum:

- Locations where other than a minor fire might develop.
- Combustible materials are closer than 35 feet to the point of operation.
- Combustibles that are 35 feet or more away but are easily ignited.
- Wall or floor openings within a 35 feet radius of exposed combustible materials.
- Combustible materials are adjacent to the opposite side of metal partitions, ceilings or roofs.

Fire watch personnel MUST be maintained at least a half an hour after welding or cutting operations have been completed.

First Aid Equipment

First aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First aid shall be rendered until medical attention can be provided.

Training

Training shall include:

- Position Responsibilities
- Cutters, welders and their supervisors must be suitably trained in the safe operations of their equipment and the safe use of the process.
- Fire Watch Responsibilities - specifically, the fire watch must know:
 - That their ONLY duty is Fire Watch.
 - When they can terminate the watch.
 - How to use the provided fire extinguisher(s).
 - Be familiar with facilities and how to activate fire alarm, if fire is beyond the incipient stage.
 - Operator Responsibilities
 - Contractor Responsibilities
 - Documentation requirements
 - Respirator Usage requirements
 - Fire Extinguisher training.

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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose:

The purpose of this program is to prevent injury from failing or failure of compressed gas cylinders and to establish requirements for handling, lifting and storing compressed gas cylinders safely.

Scope

This program covers all employees and contractors who handle, transport and/or use compressed gas cylinders.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed gas cylinders.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

Employees

- Shall follow all requirements regarding the safe handling, storage and use of compressed gas cylinders.

Procedure

General

Cylinders shall not be accepted, stored or used if evidence of denting, bulging, pitting, cuts, neck or valve damage is observed. If damage is observed:

- The cylinder must be taken out of service.
- The cylinder's owner shall be notified to remove the cylinder from the premises.
- If owned, the cylinder shall be de-pressured and inspected as required by this program.

Cylinder Identification

Gas identification shall be stenciled or stamped on the cylinder or a label used. No compressed gas cylinder shall be accepted for use that does not legibly identify its content by name.

Handling

Valve caps must be secured onto each cylinder before moving or storage.

The preferred means to move compressed gas cylinders is with a cart, carrier or with a helper.

Compressed gas cylinders must not be allowed to strike each other.

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When a cylinder cap cannot be removed by hand the cylinder shall be tagged "Do Not Use" and returned to the designated storage area for return to vendor.

Storing

All cylinders must be secured upright in a safe, dry, well-ventilated area that limits corrosion and deterioration.

- Cylinders must be secured by means that will prevent the cylinder from falling.
- When securing the cylinder, the restraints shall not be attached to electrical conduit or process piping.

Empty and non-empty cylinders shall be stored separately. All stored cylinders shall be capped.

Oxygen cylinders must be stored a minimum of 20 feet from combustible gas cylinders or areas where there may be open flame or arcing. Cylinders may also be stored where the oxygen is separated from combustible gas cylinders by a 5 foot or higher wall with a fire resistance rating of 30 minutes.

Storage areas for full and empty cylinders must be designated and labeled. Cylinders should be stored in definitely assigned places away from elevators, stairs or gangways.

Use

Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt and solvents. Only tools provided by the supplier should be used to open and close cylinder valves.

Never force or modify connections.

Only regulators and gauges shall be used within their designated ratings.

The use of a pressure-reducing regulator is required at the cylinder, unless the total system is designed for the maximum cylinder pressure.

Valves must be closed when cylinders are not in use.

Cylinders shall not be used as rollers or supports.

Cylinders shall not be placed where they can come in contact with electrical circuits.

Cylinders must be protected from sparks, slag or flame from welding, burning or cutting operations.

Empty cylinders must be returned to designated storage areas as soon as possible after use.

Inspection of Compressed Gas Cylinders

BTI shall determine that compressed gas cylinders under its control are in a safe condition to the extent that this can be determined by visual inspection. Visual and other inspections shall be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 and 14 CFR part 103). Where those regulations are not applicable, visual and other inspections shall be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962. Some elements include, but are not limited to:

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- Hoses and connections should be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.
- These owned cylinders shall be visually inspected prior to charging, before each use and at least annually.
- All inspections and testing must be documented.

High Pressure Cylinders are those cylinders marked for service pressures of 900 psi and greater.

- High pressure cylinders shall be taken out of service and submitted for re-qualification testing when any of the following conditions are identified by visual inspection.
- Cuts, dings, gouges, dents bulges, pitting, neck damage or evidence of exposure to fire.
- The cylinders shall be inspected and retested according to the requirements stated in 49 CFR 180.205 and .209.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Low Pressure Cylinders are those cylinders marked for service pressures of less than 900 psi.

- Low pressure cylinders fall into two categories, those requiring requalification and those that do not require re-qualification.
- Low pressure cylinders that do not require re-qualification shall be taken out of service and condemned when any of the following conditions are identified during inspection:
- The tare weight of the cylinder is less than 90% of the stamped on weight of the cylinder.
- Observed pitting, dents, cuts, bulging, gouges or evidence of exposure to fire.
- Low pressure cylinders subject to re-qualification shall be taken out of service, inspected and retested when visual inspection identifies any of the following conditions; dents, bulges, pitting or neck damage.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Leaking Cylinders

Leaking cylinders should be moved promptly to an isolated, well-ventilated area, away from ignition sources. Soapy water should be used to detect leaks. If the leak is at the junction of the cylinder valve and cylinder, do not try to repair it. Contact the supplier and ask for response instructions.

Transportation

Cylinders must be transported in a vertical secured position using a cylinder basket or cart and must not be rolled. Regulators should be removed and cylinders capped before movement. Cylinders should not be dropped or permitted to strike violently and protective caps are not used to lift cylinders.

Empty Cylinder Marking

Cylinders should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as when filled.

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Purpose

The purpose of the Personal Protective Equipment section is to set forth the procedures for the use, care, and maintenance of personal protective equipment required to be used by employees for the prevention of injuries.

Scope

Applies to all BTI employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

Safety Manager

- Assists in the selection of appropriate PPE. If a task exposes an employee to hazards which cannot be eliminated through engineering or administrative controls, the safety Manager assists the supervisor and service manager to identify and select PPE suitable for the specific task performed, conditions present, and frequency and duration of exposure. Employees need to give feedback to the supervisor about the fit, comfort, and suitability of the PPE being selected. Employees are provided reasons for selection of PPE.
- Assists supervisor and service managers in assuring all PPE obtained meets regulatory and this procedure's requirements.
- Assist service managers in Performing Worksite Hazard Assessments - The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE. Sources of hazards include, but are not limited to: hazards from impact/motion, high/low temperatures, chemicals, materials, radiation, falling objects, sharp objects, rolling or pinching objects, electrical hazards, and workplace layout.

Service Managers and Supervisors

- Supervisors and managers shall regularly monitor employees for correct use and care of PPE, and obtain follow-up training if required to ensure each employee has adequate skill, knowledge, and ability to use PPE.
- Supervisors and service managers shall enforce PPE safety rules following the guidance of the Attest Inspection, LLC progressive disciplinary procedures and ensure Required PPE Poster is posted properly.
- Certifies in writing the tasks evaluated, hazards found and PPE required to protect employees against hazards and ensures exposed employees are made aware of hazards and required PPE before they are assigned to the hazardous task. Certificate shall include certifier's name, signature, dates and identification of assessment documents.

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Employees

- Complying with the correct use and care of PPE.
- Reporting changes in exposure to hazardous conditions that might require a follow-up assessment of the task for PPE.
- Reporting and replacing defective PPE, this shall not be used.
- Wearing of required PPE is a condition of employment.

Procedure

General

Employee owned equipment is NOT permitted, except for safety toe footwear and prescription safety glasses. BTI is still responsible for the assurance of its adequacy, maintenance and sanitation of those two items.

All PPE issued shall be at no cost to the employee and PPE shall be used and maintained in a sanitary and reliable condition.

All employees will know and follow the procedures outlined in this Program.

Eye Protection

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapours. Eye and Face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), *Occupational and Educational Personal Eye and Face Protective Devices*.

Safety Glasses

Safety glasses, with side shields, that meet ANSI Z-87.1-2003 standards with “high Impact lenses” are required to be worn by all employees, subcontractors, and visitors while on BTI property, when deemed necessary by managers. A doctor must support “exceptions for medical reasons” in writing to exempt safety eyewear requirements.

Goggles

- Chemical splash proof goggles shall be worn when handling or mixing liquid chemicals, solvents, paints, etc., and/or as recommended on the Material Safety Data Sheet of the material being handled.
- Dust proof goggles shall be worn when blowing equipment down with air or while performing other jobs where safety glasses are not adequate to prevent airborne particles from entering the openings around the lenses and side shields.

Face Shields

- Full face shields shall be worn over safety glasses when operating hand held or stationery grinders with abrasive or wire wheels, while chipping paint or concrete or, performing jobs where there is the potential for flying objects striking the face and safety glasses or goggles would not provide adequate protection.

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Head Protection

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects. Helmets must comply with ANSI Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection or be equally effective.

- Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects.
- Hardhats are to be worn at all locations where deemed necessary as per each location's PPE Hazard Assessment.
- Hardhats will not be altered in any way.
- Do not paint or apply unauthorized stickers, name plates, etc.
- Do not drill, cut, bend, or apply heat.
- Do not alter the suspension system. H
- Hardhats will be inspected by the employee regularly for cracks, chips, scratches, signs of heat exposure (sun cracks), etc.
- Defective hardhats will be replaced immediately.
- Hardhats shall not be placed in rear windows of vehicles where they will be exposed to the sun or become projectiles during an accident.
- Employees will be trained in the use, care and maintenance of head protection equipment.

Hearing Protection

Hearing protection is required to be worn by all employees, subcontractors, and visitors while in posted "High Noise" areas.

Warning signs will be posted in areas known or suspected to have noise levels exceeding 85 dBA either constantly or intermittently.

When signs are not posted, employees shall wear hearing protection when noise caused by machinery, tools, etc., prevents normal conversations to be heard clearly.

Rule of thumb: If you have to yell to be heard, hearing protection is required

Types

- Molded Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted Earmuffs and earplugs shall be provided to the employee in sizes and configurations that will be comfortable to the employee.

Care and Maintenance

- Inspect hearing protection prior to each use.
- Hearing protection must be kept clean to prevent ear infections.
- Most earplugs used today are disposable and must be discarded when they become dirty, greasy, or cracked.
- Earmuffs that have deteriorated foam inserts, cracked seals or are defective must be replaced.

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Fit

- Due to individual differences, not everyone can wear the same type of hearing protection. A variety of styles may have to be tried before one is found to be comfortable and provide adequate protection.
- Employees shall be instructed how to obtain the proper fit.

Hand Protection

Gloves

- Gloves should be worn when performing work, which may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals.
- Welding: Welding gloves made of leather or other heat resistant materials shall be worn when performing arc welding or oxy/gas cutting.
- Chemical: Impervious (chemical resistant) gloves shall be worn when handling chemicals that specify gloves as personal protection equipment when handling.
- Refer to the specific chemical's Material Safety Data Sheet for the correct glove type.
- Persons assigned to working with chemicals, i.e., solvent vats, shall be issued their own individual gloves for hygiene purposes.
- Leather: Leather gloves should be worn when working with sharp materials or when handling rigging equipment.
- Cloth: Cloth gloves should be worn when handling objects or materials, which could cause blisters, splinters, cuts, etc.
- Heat Resistant: Heat resistant gloves shall be worn when handling hot bearings, races, or other materials or objects that have been heated beyond ambient temperatures.
- Insulated: Insulated gloves shall be worn to prevent frostbite in extreme cold climates.
- Glove Inspections
 - Gloves shall be inspected before each use for holes, tears, and worn areas.
 - Chemical gloves shall be periodically air tested for pinholes by twisting the cuff tightly, apply low air pressure to expand the glove, and then submersing in water to check for bubbles.
 - Defective gloves shall be discarded immediately. Exception: machinists are exempted from wearing gloves while working with rotating machinery.

Foot Protection

- Safety footwear shall be worn by all employees with regularly assigned duties which may expose the feet to extreme temperatures, cuts and abrasions, or exposure to heavy objects which could cause crushing of feet.
- Office workers and visitors who enter these areas on an infrequent basis will not be required to wear foot protection provided they stay clear of the work being performed.
- If required to be in the close proximity of the work, the work will be stopped while visiting the area or safety footwear will be worn.
- The boot must provide ankle protection and have soles designed to protect from punctures with defined heels for climbing ladders.
- Metatarsal guards will be worn when duties present a hazard of equipment or material crushing the foot.
- All safety footwear must meet ANSI Z41-1999 standards.

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- Client locations may require safety footwear to be worn by everyone; check with the local supervisor for client requirements before visiting field locations.

Fall Protection

Personal fall protection is required when performing certain elevated jobs in excess of six feet. Consult the BTI's Fall Protection Program.

Electrical Protection

Consult the BTI's Electrical Safety Program.

Worksite Hazard Assessment

During a hazard assessment the following sample hazard sources will be identified:

- High or low temperatures; Chemical exposures (use MSDS for guidance)
- Flying particles, molten metal or other eye, face, or skin hazards
- Falling objects or potential for dropping objects; employee falling from a height of 6' or more
- Sharp objects; Rolling or pinching that could crush the hands or feet;
- Electrical hazards

Where these hazards could cause injury to employees, personal protective equipment must be selected to substantially eliminate the injury potential. Employees will be notified for the selection and reason.

The results of this assessment shall be communicated to each affected employee and kept at the local office.

Selected/identified PPE shall be fitted to each affected employee. Exemptions for use of PPE must be supported by the PPE hazard assessment.

Monitoring

Supervisors and site managers monitor worksite tasks for changes in, or the introduction of new hazards. If new hazards are discovered, they advise the HSE Manager who then conducts a hazard assessment for appropriate PPE. The HSE Manager monitors the effectiveness of the PPE Procedure and makes recommendations to management to improve the procedure.

Training

Each employee who requires PPE shall be properly trained. Training shall include:

- When PPE is necessary.
- What PPE is necessary.
- How to properly don, doff, adjust and wear PPE.
- The limitations of PPE.
- How to maintain PPE in a sanitary and reliable condition.

Retraining

Retraining is required when:

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- The workplace changes, making the previous training obsolete.
- The type of PPE changes.
- When the employee demonstrates lack of use, improper use, or insufficient skill or understanding in PPE selection, necessity, use and limitations.

Documentation

Training shall be documented and records kept at the local office. The training documentation shall include:

- Name of employee(s) trained;
- The dates of training; and
- The training subject.

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PPE Hazard Assessment Certification Form

Name of work place: _____

Work place address: _____

Work area(s): _____

Conducted by Name/Signature: _____

Date of assessment: _____

Job/Task(s): _____

(Use a separate sheet for each job/task or work area)

EYES		
<u>Work activities, such as:</u> <input type="checkbox"/> abrasive blasting <input type="checkbox"/> chopping <input type="checkbox"/> cutting <input type="checkbox"/> drilling <input type="checkbox"/> welding <input type="checkbox"/> soldering <input type="checkbox"/> torch brazing <input type="checkbox"/> working outdoors <input type="checkbox"/> computer work <input type="checkbox"/> punch press operations <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> airborne dust <input type="checkbox"/> dirt <input type="checkbox"/> UV <input type="checkbox"/> flying particles/objects <input type="checkbox"/> blood splashes <input type="checkbox"/> hazardous liquid chemicals mists <input type="checkbox"/> chemical splashes <input type="checkbox"/> molten metal splashes <input type="checkbox"/> glare/high intensity lights <input type="checkbox"/> laser operations <input type="checkbox"/> intense light <input type="checkbox"/> hot sparks <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> If no, use: _____ <input type="checkbox"/> Safety glasses <input type="checkbox"/> Safety goggles <input type="checkbox"/> Dust-tight goggles <input type="checkbox"/> Impact goggles <input type="checkbox"/> Welding helmet/shield <input type="checkbox"/> Chemical goggles <input type="checkbox"/> Chemical splash goggles <input type="checkbox"/> Laser goggles <input type="checkbox"/> Shading/Filter (#_____) <input type="checkbox"/> Welding shield <input type="checkbox"/> Other:
FACE		
<u>Work activities, such as:</u> <input type="checkbox"/> cleaning <input type="checkbox"/> cooking <input type="checkbox"/> siphoning <input type="checkbox"/> painting <input type="checkbox"/> dip tank operations <input type="checkbox"/> metal pouring <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> hazardous liquid chemicals <input type="checkbox"/> extreme heat <input type="checkbox"/> extreme cold <input type="checkbox"/> potential irritants: <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> If no, use: _____ <input type="checkbox"/> Face shield <input type="checkbox"/> Shading/Filter (#_____) <input type="checkbox"/> Welding shield <input type="checkbox"/> Other:

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HEAD		
<u>Work activities, such as:</u> <input type="checkbox"/> building maintenance <input type="checkbox"/> confined space operations <input type="checkbox"/> construction <input type="checkbox"/> electrical wiring <input type="checkbox"/> walking/working under catwalks <input type="checkbox"/> walking/working on catwalks <input type="checkbox"/> walking/working under conveyor belts <input type="checkbox"/> working with/around conveyor belts <input type="checkbox"/> walking/working under crane loads <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> beams <input type="checkbox"/> pipes <input type="checkbox"/> exposed electrical wiring or components <input type="checkbox"/> falling objects <input type="checkbox"/> fixed object <input type="checkbox"/> machine parts <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Protective Helmet <input type="checkbox"/> Type A (low voltage) <input type="checkbox"/> Type B (high voltage) <input type="checkbox"/> Type C <input type="checkbox"/> Bump cap (not ANSI-approved) <input type="checkbox"/> Hair net or soft cap <input type="checkbox"/> Other:
HANDS/ARMS		
<u>Work activities, such as:</u> <input type="checkbox"/> baking <input type="checkbox"/> cooking <input type="checkbox"/> grinding <input type="checkbox"/> welding <input type="checkbox"/> working with glass <input type="checkbox"/> using power tools <input type="checkbox"/> using computers <input type="checkbox"/> working outdoors <input type="checkbox"/> using knives <input type="checkbox"/> dental and health care services <input type="checkbox"/> garbage disposal <input type="checkbox"/> computer work <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> blood <input type="checkbox"/> irritating chemicals <input type="checkbox"/> tools or materials that could scrape or cut <input type="checkbox"/> extreme heat <input type="checkbox"/> extreme cold <input type="checkbox"/> animal bites <input type="checkbox"/> electric shock <input type="checkbox"/> vibration <input type="checkbox"/> musculoskeletal disorders <input type="checkbox"/> sharps injury <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Gloves <input type="checkbox"/> Chemical resistance <input type="checkbox"/> Liquid/leak resistance <input type="checkbox"/> Temperature resistance <input type="checkbox"/> Abrasion/cut resistance <input type="checkbox"/> Slip resistance <input type="checkbox"/> Latex or nitrile <input type="checkbox"/> Anti-vibration <input type="checkbox"/> Protective sleeves <input type="checkbox"/> Ergonomic equipment _____ <input type="checkbox"/> Other:

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FEET/LEGS		
<u>Work activities, such as:</u> <input type="checkbox"/> building maintenance <input type="checkbox"/> construction <input type="checkbox"/> demolition <input type="checkbox"/> food processing <input type="checkbox"/> foundry work <input type="checkbox"/> working outdoors <input type="checkbox"/> logging <input type="checkbox"/> plumbing <input type="checkbox"/> trenching <input type="checkbox"/> use of highly flammable materials <input type="checkbox"/> welding <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> explosive atmospheres <input type="checkbox"/> explosives <input type="checkbox"/> exposed electrical wiring or components <input type="checkbox"/> heavy equipment <input type="checkbox"/> slippery surfaces <input type="checkbox"/> impact from objects <input type="checkbox"/> pinch points <input type="checkbox"/> crushing <input type="checkbox"/> slippery/wet surface <input type="checkbox"/> sharps injury <input type="checkbox"/> blood <input type="checkbox"/> chemical splash <input type="checkbox"/> chemical penetration <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> fall <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Safety shoes or boots <input type="checkbox"/> Toe protection <input type="checkbox"/> Electrical protection <input type="checkbox"/> Heat/cold protection <input type="checkbox"/> Puncture resistance <input type="checkbox"/> Chemical resistance <input type="checkbox"/> Anti-slip soles <input type="checkbox"/> Leggings or chaps <input type="checkbox"/> Foot-Leg guards <input type="checkbox"/> Other:
BODY/SKIN		
<u>Work activities such as:</u> <input type="checkbox"/> baking or frying <input type="checkbox"/> battery charging <input type="checkbox"/> dip tank operations <input type="checkbox"/> fiberglass installation <input type="checkbox"/> sawing <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> chemical splashes <input type="checkbox"/> extreme heat <input type="checkbox"/> extreme cold <input type="checkbox"/> sharp or rough edges <input type="checkbox"/> irritating chemicals <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Vest, Jacket <input type="checkbox"/> Coveralls, Body suit <input type="checkbox"/> Raingear <input type="checkbox"/> Apron <input type="checkbox"/> Welding leathers <input type="checkbox"/> Abrasion/cut resistance <input type="checkbox"/> Other:

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BODY/WHOLE		
<u>Work activities such as:</u> <input type="checkbox"/> building maintenance <input type="checkbox"/> construction <input type="checkbox"/> logging <input type="checkbox"/> computer work <input type="checkbox"/> working outdoors <input type="checkbox"/> utility work <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> working from heights of 10 feet or more <input type="checkbox"/> impact from flying objects <input type="checkbox"/> impact from moving vehicles <input type="checkbox"/> sharps injury <input type="checkbox"/> blood <input type="checkbox"/> electrical/static discharge <input type="checkbox"/> hot metal <input type="checkbox"/> musculoskeletal disorders <input type="checkbox"/> sparks <input type="checkbox"/> chemicals <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> elevated walking/working surface <input type="checkbox"/> working near water <input type="checkbox"/> injury from slip/trip/fall <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Fall Arrest/Restraint <input type="checkbox"/> Traffic vest <input type="checkbox"/> Static coats/overalls <input type="checkbox"/> Flame resistant jacket/pants <input type="checkbox"/> Insulated jacket <input type="checkbox"/> Cut resistant sleeves/wristlets <input type="checkbox"/> Hoists/lifts <input type="checkbox"/> ergonomic equipment: _____ <input type="checkbox"/> Other: </div> <div> <u>With:</u> <input type="checkbox"/> Hood <input type="checkbox"/> Full sleeves </div> </div>
LUNGS/RESPIRATORY		
<u>Work activities such as:</u> <input type="checkbox"/> cleaning <input type="checkbox"/> mixing <input type="checkbox"/> painting <input type="checkbox"/> fiberglass installation <input type="checkbox"/> compressed air or gas operations <input type="checkbox"/> confined space work <input type="checkbox"/> floor installation <input type="checkbox"/> ceiling repair <input type="checkbox"/> working outdoors <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> dust or particulate <input type="checkbox"/> toxic gas/vapor <input type="checkbox"/> chemical irritants (acids) <input type="checkbox"/> welding fume <input type="checkbox"/> asbestos <input type="checkbox"/> pesticides <input type="checkbox"/> organic vapors <input type="checkbox"/> oxygen deficient environment <input type="checkbox"/> paint spray <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Dust mask <input type="checkbox"/> Disposable particulate respirator <input type="checkbox"/> Replaceable filter particulate w/cartridge <input type="checkbox"/> half faced <input type="checkbox"/> full face <input type="checkbox"/> PAPR (Air recycle) <input type="checkbox"/> PPSA (Air supply) </div> <div> <u>With/Type:</u> _____ </div> </div>

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EARS/HEARING			
<u>Work activities such as:</u> <input type="checkbox"/> generator <input type="checkbox"/> ventilation fans <input type="checkbox"/> motors <input type="checkbox"/> sanding <input type="checkbox"/> pneumatic equipment <input type="checkbox"/> punch or brake presses <input type="checkbox"/> use of conveyors <input type="checkbox"/> other:		<input type="checkbox"/> grinding <input type="checkbox"/> machining <input type="checkbox"/> routers <input type="checkbox"/> sawing <input type="checkbox"/> sparks	
<u>Work-related exposure to:</u> <input type="checkbox"/> loud noises <input type="checkbox"/> loud work environment <input type="checkbox"/> noisy machines/tools <input type="checkbox"/> punch or brake presses <input type="checkbox"/> other:		<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> ear muffs <input type="checkbox"/> ear plugs <input type="checkbox"/> leather welding hood	

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Birmingham Toledo Inc. will be referred by BTI in the following document.

Purpose

The purpose of this program is to provide fall protection procedures to prevent injury to employees while performing work assignments at elevated levels.

Any changes to this Fall Protection Program must be approved by management, who is designated the Qualified Person. This is based on training received in fall protection planning and has demonstrated skills and knowledge in the preparation of fall programs, plans and the hazards involved.

Scope

Applies to all BTI employees who have work assignments at work levels that exceed 6 feet in height where guardrails or nets are not utilized. This includes work near and around excavations. Guardrails, safety nets, or personal fall arrest systems shall be used where feasible. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

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

"Body belt (safety belt)" means a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

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

"Buckle" means any device for holding the body belt or body harness closed around the employee's body.

"Carabineer" - see Snaphook

"Connector" means a device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabineer, or it may be an integral component of part of the system (such as a buckle or D-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

"Deceleration device" means any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

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"Deceleration distance" means the additional vertical distance a falling employee travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to operate. It is measured as the distance between the location of an employee's body belt or body harness attachment point at the moment of activation (at the onset of fall arrest forces) of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

"Equivalent" means alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

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

"Free fall" means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

"Free fall distance" means the vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

"Guardrail system" means a barrier erected to prevent employees from falling to lower levels.

"Infeasible" means that it is impossible to perform the inspection work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

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

"Leading edge" means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

"Lifeline" means a component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline), and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

"Lower levels" means those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

"Personal fall arrest system" means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

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"Positioning device system" means a body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

"Rope grab" means a deceleration device which travels on a lifeline and automatically, by friction, engages the lifeline and locks so as to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

"Safety Nets...Safety nets shall be provided when workplaces are higher than 25 feet above ground or water surfaces or other surfaces where the use of ladders, scaffolds, catch platforms, temporary floors, safety lines or safety belts are impractical.

Nets shall extend 8 feet beyond the edge of the work surface where employees are exposed and shall be installed as close under the work surface as practical but in no case more than 25 feet below the work surface. Nets shall be positioned in a manner to prevent the user from coming into contact with below surfaces or structures. Proper clearance positioning of nets shall be determined by impact load testing. Work procedures shall not begin until nets are in place and have been properly tested.

New nets shall meet accepted performance standards of 17,500 foot pounds minimum impact resistance as determined and certified by the manufacturers and shall bear a label of proof test. Edge ropes shall provide a minimum breaking strength of 5000 pounds.

"Self-retracting lifeline/lanyard" means a deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.

"Snaphook" means a connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types: (1) The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or (2) The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. As of January 1, 1998, the use of a non-locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

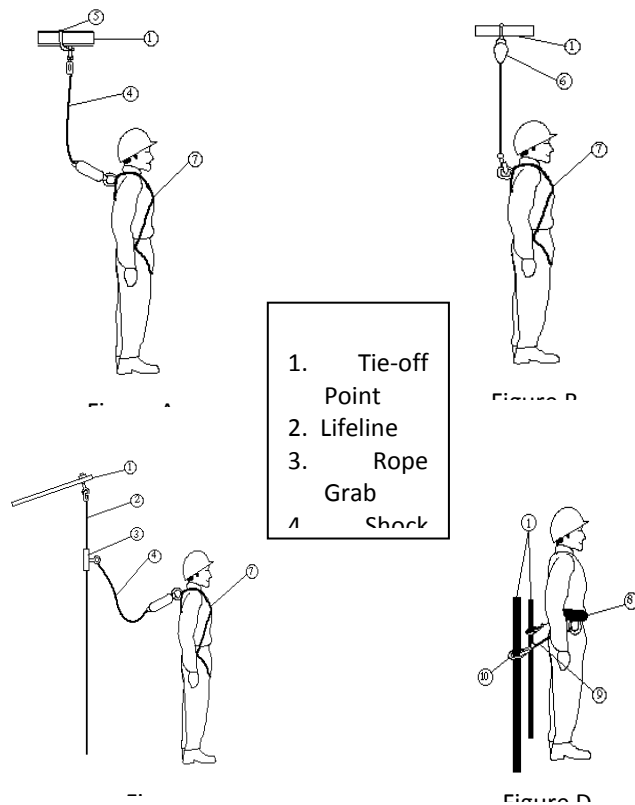
"Unprotected sides and edges" means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches (1.0 m) high.

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

"Work area" means that portion of a walking/working surface where job duties are being performed.

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Drawing of Components



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Responsibilities

Service Manager

It is the responsibility of the local service manager (designated competent person) to implement this Fall Protection Program. Continual observational safety checks of work operations and the enforcement of the safety policy and procedures shall be regularly enforced. All jobs shall be pre-planned prior to the start of work.

Supervisor

The Supervisor shall ensure that all persons assigned to work at elevated levels, exceeding 6 feet in height or more above lower level and where guardrails or nets are not utilized, be protected by personal fall protection equipment.

- Supervisors shall make exposure determinations and shall discuss with their employees the extent to which scaffolds, ladders or vehicle mounted work platforms can be used.
- Ensure that fall protection equipment is available and in safe working condition.
- Provide for emergency rescue in the event of a fall. Pre-plan the job to ensure that employees have been properly trained in the use, limitations, inspections and rescue procedures and that training records are on file.

Employees

Employees shall ensure they have and use the fall protection equipment as required by this program and:

- Understand the potential hazards of working at elevated levels as well as gaining access to and from the work location.
- Understand the use and limitations of such equipment.
- Pre-plan the job with his/her supervisor to agree that the job can be done safely.
- Inspect such equipment before each use and to report defective equipment immediately to their supervisor.

Procedure

Fall protection is required whenever employees are potentially exposed to falls from heights of six feet or greater to lower levels. This includes work near and around excavations. Use of guard rails, safety net, or personal fall arrest systems should be used when the standard methods of protection are not feasible or a greater hazard would be created.

When purchasing equipment and raw materials for use in fall protection systems applicable ANSI, ASTM or OSHA approved equipment shall be used.

Minimum Standards

The following are minimum standards for BTI employee personal fall protection systems:

- The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level, or above the wearer's head, except when climbing.
- Body harnesses and components shall be used only for employee protection and not to hoist materials.

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- Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.
- Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.
- Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists unless prior approval is obtained from a competent person.
- If and when a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

Stopping a Fall

The fall arrest system shall be rigged such that an employee can neither free fall more than 6 feet, nor contact any lower level.

The fall arrest system shall bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet.

The fall arrest system shall have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet, or the free fall distance permitted by the system, whichever is less.

Protection From Falling Objects

When employees are required to work in the near vicinity of others working with materials, tools, or equipment at elevated levels, Barricades around the immediate area of the overhead work shall be erected to prohibit employees from entering the barricaded area.

Employees performing work at elevated levels shall keep tools, materials, and equipment away from the edge to keep potential objects from falling over the side. Where practical, tools, etc. shall be secured with rope, wire, etc. to keep them from falling.

Portable Ladders

Three point climbing is required while ascending/descending ladders. While on ladders, both hands and one foot, or both feet and one hand shall always be in contact with the ladder.

Tools required to perform a task shall be transported by a mechanical carrier such as a tag line, suspended bucket or tool belt.

- Tools shall not be carried by hand while climbing.
- Hands must be free to grip the ladder.
- Tools shall not be carried in clothing pockets.
- Tools shall be pulled up to the job site only after reaching the area of work.

When work is to be performed from straight/extension ladders, fall protection shall be utilized when heights exceed 6 feet.

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Straight ladders shall be tied off at the top to prevent them from moving. A second person shall steady the ladder at the base while it is being tied off at the top by another employee. Do not tie off fall protection equipment to the ladder.

Storage

A dedicated storage area shall be provided for the storage of fall protection equipment and all components. The storage area shall keep the equipment clean, dry, and free from oils, chemicals, paints, and excessive heat.

Inspections

Fall protection equipment shall be inspected before each use for wear, damage, other deterioration, or other defects.

Elevated Personnel Platforms

Work performed, regardless of the nature of the work, from personnel platforms raised by forklifts, cranes, scissor lifts, etc., shall require the use of a full body harness and shall be connected to the platform.

Rescue

Prompt rescue of employees shall be provided in the event of a fall or shall assure the employees are able to rescue themselves. The pre-planning stage prior to the beginning of each elevated work assignment shall be evaluated by the supervisor to provide rescue of employees involved in a fall.

Incident Investigations

All incidents and near misses must be investigated according to BTI investigation procedure. Changes to the fall protection program shall be implemented if deemed appropriate from incident corrective actions.

Training

Employees who may be exposed to fall hazards shall be trained to recognize the hazards of falling and understand the procedures to be followed in order to minimize these hazards.

The employee will be trained in the use and operation of fall arrest systems, inspections, and maintenance procedures.

Training must be conducted initially and refresher training conducted annually or as needed due to deficiencies in training, changes in the workplace, changes in fall protection systems or procedures that render previous training obsolete or inadequacies in an employee's understanding of previous training.

Training must be documented in writing. Training records shall include:

- Who was trained
- When and dates of training
- Signature of person providing training
- Date training was deemed adequate

Training records shall be retained in the corporate office.

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Birmingham Toledo Inc. will be referenced by BTI in the following document.

Purpose

BTI could be required to participate as a contract employer at client locations with railroads or tracks. BTI has no facilities with railroads or tracks however has a duty to ensure BTI employees or its contractors are aware of the hazards and controls associated with working on or near rails or tracks at a client facility

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region is required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Only trained personnel can be involved in working on or near rails or tracks at a client facility.

Procedure

Obtain Permission to Work In Advance

Prior to performing work within six (6) feet of any railroad track, permission must be obtained from the owner client railroad supervisor or designated person to take the track out of service. If required, complete a client work permit prior to beginning work.

Safety Equipment

Approved hard hats, high visibility clothing, approved metatarsal boots, gloves and approved safety glasses with permanently attached side shields shall be worn in designated areas associated with rails.

Protection of Workers from Moving Equipment

Never attempt to crawl under rail equipment or climb over moving rail equipment or attempt to cross in front of moving equipment.

Never position any part of the body in a potential pinch point. Rail equipment can move in either direction at anytime with no warning.

Railroad Crossing Safety

In all cases pedestrians/employees shall cross at existing designated pedestrian rail crossings where provided. Additionally, vehicle crossings are not intended as pedestrian crossings unless they are so identified and/or located, and no other pedestrian crossings exist in the area.

If a designated rail crossing is not available the following general safety procedures for crossing railroad tracks shall be followed:

- Do not cross within 10 feet of the end of a parked rail car.

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- Do not cross between uncoupled cars.
- Stop, look and listen prior to proceeding across the tracks
- Never step on rails, as they may be slippery.

Training

Appropriate training based on complexity of the job and potential hazards related to in plant rail hazards shall be provided to all applicable employees. Assessments shall be used to determine whether the employees have the knowledge and have demonstrated skills to safely perform their work assignments.

All training shall be conducted and documented in advance of working on or near in plant rails.

Retraining and testing shall be required for unsatisfactory/unsafe performance of job assignments.

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Birmingham Toledo Inc. will be referred to as BTI in the following document.

Purpose

The purpose of this program is to provide a process to minimize employee-hearing loss caused by excessive occupational exposure to noise.

Scope

This program is applicable to all employees who may be exposed to noise in excess of 85 decibels (decibels). When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Birmingham Toledo Inc. has no job classifications where employees work in areas where the exposure to noise levels are 85 decibels or greater for the 8 hour time-weighted average of 85 decibels, thus would not be required to implement a hearing conservation program. If areas on non-owned sites are above minimum thresholds then administrative procedures will be taken to control levels.

Definitions

Audiometric testing - means detection by the person being tested of a series of pure tones. For each tone, the person indicates the lowest level of intensity that they are able to perceive.

Decibels – means the sound energy measured by a sound level meter using the “A” scale. The “A” scale is electronically weighted to simulate the response of the human ear to high and low frequency noise.

Slow Response – means the setting on the sound level meter that averages out impulses of brief duration that would cause wide fluctuation in the sound level meter reading.

Standard Threshold Shift – means a change in hearing threshold relative to the baseline audiogram of an average of 10 dB (corrected for age) at 2000, 3000 and 4000 Hz in either ear.

Key Responsibilities

Managers and Supervisors

- Ensure requirements of this program are established and maintained.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Wear hearing protection when required, attend the training, and cooperate with testing and sampling.

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Procedure

Occupational hearing loss is a cumulative result of repeated or continued absorption of sound energy by the ear; employee protection is based on reduction of the noise level at the ear or limiting the employee's exposure time. BTI shall offer hearing protection to all employees exposed to potential high noise levels in working areas and to those employees requesting hearing protection.

All employees, who work in areas where the exposure to noise levels are 85 decibels or greater for the 8 hour time-weighted average of 85 decibels, must wear hearing protection and BTI shall implement a monitoring program to identify employees to be included in the hearing conservation program.

Surveys

Surveys will be conducted by a qualified employee or third party.

To evaluate noise exposure in terms of possible hearing damage, it is necessary to know the overall sound level ("A" scale measurement), the exposure time of the individual in hours per day and the length of time the individual has worked in the area being surveyed. This data shall be supplemented by the following:

- Name of area and location
- Date and time of survey
- Name of person conducting survey
- Description of instrument used, model and serial number
- Environmental conditions
- Description of people exposed

BTI shall notify each employee of their monitoring results, or, if their job is exposed to noise 85 decibels or greater.

A plot of noise levels must be made for owned facilities. The plot must be filed or posted at the facility. BTI shall evaluate hearing protector attenuation for the specific noise environments. The adequacy of hearing PPE shall be reevaluated whenever noise exposures increase to the point that the PPE provided may no longer provide adequate protection. BTI shall then provide more effective PPE where necessary.

All sound measuring equipment must be calibrated before and after each survey. Records of sound measuring equipment calibration and noise level surveys shall be kept for 20 years.

Noise Surveys must be repeated whenever changes in the workplace may expose additional personnel to high noise or hearing protection being used by employees may not be adequate to reduce the noise exposure to a level below 85 decibels.

Sound Level Surveys

- All owned facilities that are suspected of having noise levels exceeding 85 decibels must be screened.

Exposure Surveys:

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- A representative sampling of employees shall be conducted to determine the exposure to noise over a period of time.
- Noise dosimeters must be capable of integrating all continuous, intermittent and impulsive sound levels from 80 dB to 130 dB and must be calibrated so a dose of 50% corresponds to a time weighted average of 85 dB.

Signage

Clearly worded signs shall be posted at entrances to, or on the periphery of, areas where employees may be exposed to noise levels in excess of 85 decibels. These signs shall describe the hazards involved and the required protective actions.

Audiometric Testing

Each employee who is exposed to noise 85 decibels (8 hr TWA) or greater must take an audiogram annually.

- An employee must receive a baseline audiogram within six months of their first exposure to 85 decibels or greater for an eight hour period.
- An employee shall receive an annual audiogram every year they work in a position that is exposed to noise 85 decibels or greater.
- A qualified third party shall perform all audiometric testing, evaluation, reporting and retesting.
- Audiometric testing shall be preceded by a period of at least 14 hours during which there is no exposure to workplace sound levels in excess of 80 decibels.
- This requirement may be met by the use of hearing protectors that reduce the employee noise exposure level below 80 decibels.
- An otoscopic exam is required before an audiogram is initiated. A qualified person shall examine the ear canal for any ear infections or canal irregularities that might affect the audiogram or rule out the use of earplugs.

Annual audiograms shall be evaluated as follows:

- Each audiogram shall be compared to the employees' baseline audiogram to ensure the test was valid and to determine if a standard threshold shift has occurred.
- If a standard threshold shift is determined, the employee will be retested within 30 days.
- The retest results will be considered as the annual audiogram.
- Employees shall be informed of their audiometric test results in writing within 21 days of determination.

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- If the employee has sustained a standard threshold shift, after retesting, that employee shall be retrained and refitted for appropriate hearing protection.
- The employee shall be referred for additional medical evaluation if indicated.

Employee audiograms are considered medical/exposure records. These records must be kept for the length of employment plus 30 years.

Hearing Protection Devices

Earmuffs and earplugs shall be made available to the employee in sizes and configurations that will be comfortable to the employee. These hearing protection devices shall be made available to all employees exposed to an 8 hour time-weighted average of 85 db at no cost to employees. Employees shall be instructed how to obtain the proper fit.

TRAINING

A training program shall be established to inform employee, on an annual basis, of the effect of noise on hearing; the purpose of hearing protectors, including the advantages, disadvantages and alternatives of various types, including instructions on selection, fitting, use and care; and the purpose of audiometric testing and an explanation of test procedures.

Training shall be updated to be consistent with changes in the work process and PPE requirements.

All staff shall have a copy of this program and it shall be posted at the worksite and a copy made available to all employees, their representatives and regulatory agencies.

The training must be documented.

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Birmingham Toledo Inc. will be referred to by BTI in the following document.

Purpose

The purpose of this program is to establish requirements for the safe operation and use of Powered Industrial Trucks.

Scope

This program applies to all BTI employees who operate a Powered Industrial Truck in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers BTI employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. ***NOTE:*** Only trained and certified operators, including supervisors, are allowed to operate forklifts and industrial trucks. BTI shall certify all authorized employees regarding competency on equipment.

Definitions

Authorized Employee – A person, at least 18 years of age and who has completed the company's required safety training for the safe operations of forklifts.

Forklift (Powered Industrial Truck) – Any mechanical device used for the movement of supplies, material or finished a product that is powered by an electric motor or an internal combustion engine.

Key Responsibilities

Manager/Supervisor

- Shall ensure that each powered forklift operator is competent to operate a forklift safely, as demonstrated by the successful completion of the training and evaluation program.
- Shall ensure that all forklifts are inspected before each shift and all repairs are made before the forklift is operated.

Employees

- Shall be current on applicable training.
- Operate forklift in accordance to the forklift standards and manufacture requirements.
- Inspect forklift at the start of shift, and remove from service if defects are found until they are corrected.
- Operate forklift in a safe manner.

Procedure

General

All approved forklifts shall have a manufactures identification plate attached showing all specifications of the forklift and that the forklift is accepted by a nationally recognized testing laboratory.

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Modifications and additions, that affect capacity and safe operation, shall not be performed without manufacturer's prior written approval. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed reflect the modification or addition.

If the forklift is equipped with front-end attachments other than factory installed attachments, the supervisor shall ensure that the forklift is marked to identify the attachments and show the approximate weight of the forklift and attachment combination at maximum elevation with load laterally centered.

The operator shall see that all nameplates and markings are in place and are maintained in a legible condition.

All forklifts shall be equipped with safety seat belts. All forklifts shall be equipped with a horn, backup alarm, beacon light, headlights and taillight.

Safety Guards

Forklifts shall be fitted with an overhead rollover cage, as per manufactures specifications.

If the type of load presents a hazard to the operator, the forklift shall be equipped with a vertical load backrest extension, as per manufactures specifications.

Training

Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, and written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee) and evaluation of the operator's performance in the workplace.

All operator training and evaluation shall be conducted by authorized persons who have the knowledge, documented training, and experience to train powered industrial truck operators and evaluate their competence.

Selected employees who have been trained shall receive refresher training be evaluated, at a minimum, every three years.

Training shall include the following topics, except in topics for locations where they are not applicable to safe operation of the truck due to type of equipment or facility conditions.

1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate,
2. Differences between the truck and the automobile,
3. Truck controls and instrumentation: where they are located, what they do, and how they work,
4. Engine or motor operation,
5. Steering and maneuvering,
6. Visibility (including restrictions due to loading),
7. Fork and attachment adaptation, operation, and use limitations,
8. Vehicle capacity,
9. Vehicle stability,
10. Any vehicle inspection and maintenance that the operator will be required to perform,

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11. Refueling and/or charging and recharging of batteries,
12. Operating limitations,
13. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate,
14. Surface conditions where the vehicle will be operated,
15. Composition of loads to be carried and load stability,
16. Load manipulation, stacking, and unstacking,
17. Pedestrian traffic in areas where the vehicle will be operated,
18. Narrow aisles and other restricted places where the vehicle will be operated,
19. Hazardous (classified) locations where the vehicle will be operated,
20. Ramps and other sloped surfaces that could affect the vehicle's stability,
21. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust,
22. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation, and
23. The requirements of CFR 1910.178 (Powered Industrial Trucks).

Retraining is required when employee performs the equipment in an unsafe manner, there is an incident or a different vehicle type is put in service or changes in conditions.

Certification

The trainer shall certify in writing that each operator has been trained and evaluated as required.

The certification shall include the name of the operator, the date of the training, the date of the evaluation and the identity of the person(s) performing the training and/or evaluation.

Operations

General

- All operators shall wear a safety seat belt when operating a forklift.
- Forklifts shall not be driven up to anyone standing in front of a bench or other fixed object.
- No person shall be allowed to stand or pass under the elevated portion of any forklift, whether loaded or empty.
- Unauthorized personnel shall not be permitted to operate forklifts.
- No riders or passengers are permitted.
- It is prohibited for arms or legs to be placed between the uprights of the mast or outside the running lines of the forklift.
- When a forklift is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and brakes set.
- Wheels shall be blocked if the forklift is parked on an incline.
- A forklift is unattended when the operator is 25 ft. or more away from the vehicle, which remains in view, or whenever the operator leaves the forklift and it is not in view.
- When the operator of a forklift is dismounted and within 25 ft. of the forklift still in view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement.

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- A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform or freight car.
- Forklifts shall not be used for opening or closing freight doors.
- Brakes shall be set and wheel blocks shall be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading.
- Fixed jacks may be necessary to support a semi trailer during loading or unloading when the trailer is not coupled to a tractor.
- The flooring of trucks, trailers, and railroad cars shall be checked for breaks and weakness before they are driven onto.
- There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- An overhead guard (cages) shall 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.
- Fire aisles, access to stairways, and fire equipment shall be kept clear.

Traveling

- The operator shall slow down and sound the horn at cross isles and other locations where vision is obstructed.
- If the load being carried obstructs forward view, the operator shall be required to travel with the load trailing.
- The operator shall be required to look in the direction of, and keep a clear view of the path of travel.
- Grades shall be ascended or descended slowly.
- When ascending or descending grades in excess of 10 percent, loaded forklifts shall be driven with the load upgrade.
- On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.
- Under all travel conditions the forklift shall 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 operator shall slow down for wet and slippery floors.
- Dock board or bridge plates shall be properly secured before they are driven over.
- Dock board or bridge plates shall be driven over carefully and slowly and their rated capacity never exceeded.
- While negotiating turns, speed shall be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion.
- Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.

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Loading

- Only stable or safely arranged loads shall be handled.
- Caution shall be exercised when handling off-center loads, which cannot be centered.
- Only loads within the rated capacity of the forklift shall be handled.
- Forklifts equipped with attachments shall be operated as partially loaded forklifts when not handling a load.
- A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load.
- Extreme care shall be used when tilting the load forward or backward, particularly when high tiering.
- Tilting forward with load engaging means elevated shall be prohibited except to pick up a load.
- An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack.
- When stacking or tiering, only enough backward tilt to stabilize the load shall be used.

Operation of the Truck

- If at any time a forklift is found to be in need of repair, defective, or in any way unsafe, the forklift shall be taken out of service until it has been restored to safe operating condition.
- Fuel tanks shall not be filled while the engine is running.
- Spillage of oil or fuel shall be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- When fueling with Liquefied Petroleum Gas (LPG), precautions and handling requirements set forth in the "Safe Handling of LPG" program shall be followed.
- No forklift shall be operated with a leak in the fuel system.
- Open flames shall not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.
- Operator must verify trailer chocks, supports, and dock plates are secured prior to loading/unloading.

Maintenance of Forklifts

- Only authorized personnel shall perform maintenance, and make repairs.
- Those repairs to the fuel and ignition systems of forklifts, which involve fire hazards, shall be conducted only in locations designated for such repairs.
- Forklifts in need of repairs to the electrical system shall have the battery disconnected prior to such repairs.
- Only parts equivalent with those used in the original design shall replace all parts of any forklift requiring replacement parts.
- Forklifts shall not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer, nor shall they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts.
- Additional counter weighting of fork trucks shall not be done unless approved by the truck manufacturer.

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- Forklifts shall be inspected before being placed in service, and shall not be placed in service if the inspection shows any condition adversely affecting the safety of the forklift.
- Inspection shall be made at least daily – prior to each shift. (visual – non documented) Inspection items shall be posted on each forklift. Operators must insure the vehicle is safe prior to operating.
- Where forklifts are used on a round-the-clock basis, they shall be inspected before each shift.
- Defects when found shall be immediately reported to the supervisor, and corrected before operating the forklift.
- When the temperature of any part of any forklift is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the forklift shall be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Forklifts shall be kept in a clean condition, free of lint, excess oil, and grease.
- Noncombustible agents, where at all possible, shall be used for cleaning trucks.
- Low flash point (below 100 degrees F.) solvents shall not be used.
- High flash point (at or above 100 degrees F.) solvents may be used if precautions regarding toxicity, ventilation, and fire hazard are mitigated with the agent or solvent used.

Mobile Equipment

Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of BTI mobile equipment.

Key Responsibilities

Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the program and related procedures. These procedures are kept in the designated safety manager's office.

Service Manager

- Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace vehicle safety program.
 - Follow all requirements, report unsafe conditions, and follow all posted requirements.
-

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Mobile Equipment

The following requirements apply for all BTI locations:

BTI must develop and implement safe work procedures for the use of powered mobile equipment in the workplace and must train workers in those safe work procedures.

The equipment operator of mobile equipment shall be directly responsible for the safe operation of that equipment and shall comply with all laws and regulations governing the operation of the equipment.

Maintenance records for any service, repair or modification which affects the safe performance of the equipment must be maintained and be reasonably available to the operator and maintenance personnel during work hours

All mobile equipment shall be maintained in safe operating condition and operation, inspection, repair, maintenance and modification shall be carried out in accordance with manufacturer's instructions or, in the absence of the instructions, in accordance with good engineering practice.

Servicing, maintenance and repair of mobile equipment shall be done when the equipment is not in operation, except that equipment in operation may be serviced if the continued operation is essential to the process and a safe means is provided.

Only authorized employees shall be allowed to operate mobile equipment. Authorization to operate mobile equipment will be issued to employees qualifying under appropriate training and proficiency testing. The person must also be familiar with the operating instructions pertaining to the equipment and be authorized to operate the equipment. Authorization will be issued on after these requirements are met.

A supervisor must not knowingly operate or permit a worker to operate mobile equipment which is, or could create, an undue hazard to the health or safety of any person or is in violation of any local or federal regulations.

Mobile equipment in which the operator cannot directly or by mirror or other effective device see immediately behind the machine must have an automatic audible warning device which activates whenever the equipment controls are positioned to move the equipment in reverse, and if practicable, is audible above the ambient noise level.

Unauthorized personnel shall not be permitted to ride on equipment unless it is equipped to accommodate riders safely.

At the beginning of each shift, the operator shall inspect and check the assigned equipment, reporting immediately to his/her supervisor any malfunction of the clutch or of the braking system, steering, lighting, or control system and locking/tagging out the equipment if necessary.

The operator shall immediately report defects and conditions affecting or likely to affect the safe operation of the equipment to his or her immediate supervisor or other authorized person and confirm this by a written report as soon as possible. If an inspection of powered mobile equipment identifies a defect or unsafe condition that is hazardous or may create a risk to the safety or health of a worker BTI must ensure that the powered mobile equipment is not operated until the defect is adjusted, repaired or the unsafe condition is corrected.

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The operator of mobile equipment must not leave the controls unattended unless the equipment has been secured against inadvertent movement such as by setting the parking brake, placing the transmission in the manufacturer's specified park position and by chocking wheels where necessary.

No operator shall leave unattended a suspended load, machine or part or extension of it unless it has been immobilized and secured against inadvertent movement.

Powered equipment shall not be left unattended unless forks, buckets, blades and similar parts are in the lowered position or solidly supported.

Before a worker starts any powered mobile equipment he/she shall make a complete 360 degree visual inspection of the equipment and the surrounding area to ensure that no worker, including the operator, is endangered by the start up of the equipment. No worker shall start any powered mobile equipment until the inspection is completed.

All powered mobile equipment is inspected by a competent person for defects and unsafe conditions as often as is necessary to ensure that it is capable of safe operation. A written record of the inspections, repairs and maintenance carried out on the powered mobile equipment is kept at the workplace and made readily available to the operator of the equipment. As soon as is reasonably practicable the defect must be repaired or the unsafe condition is corrected.

The operator shall use access provided to get on or off of equipment. Do not jump to the ground.

Every forklift will be equipped with a seat belt for the operator if the forklift is equipped with a seat and the operator of a forklift is required to use the seat-belt. Before starting the engine, the driver shall fasten seat belts and adjust them for a proper fit.

Each mobile equipment vehicle used for lifting must be provided with a durable and clearly legible load rating chart that is readily available to the operator. The operator shall not load the vehicle/equipment beyond its established load limit and shall not move loads which because of the length, width, or height that have not been centered and secured for safe transportation.

Mobile equipment used for lifting or hoisting or similar operations shall have a permanently affixed notation stating the safe working load capacity of the equipment and the notation must be kept legible and clearly visible to the operator.

The operator shall not use, or attempt to use any vehicle in any manner or for any purpose other than for which it is designated.

An employer must ensure that a competent person services, inspects, disassembles and reassembles a tire or tire and wheel assembly of powered mobile equipment in accordance with the specifications of both the tire manufacturer and the manufacturer of the powered mobile equipment.

Adequate and approved fire suppression equipment shall be provided near mobile equipment.

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The operator of a gasoline or diesel vehicle shall shut off the engine before filling the fuel tank and shall see that the nozzle of the filling hose makes contact with the filling neck of the tank. No one shall be on the vehicle during fuelling operations except as specifically required by design. There shall be no smoking or open flames in the immediate area during fuelling operation.

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Purpose

The purpose of this program is to ensure that Birmingham Toledo Inc. continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors.

Scope

This program applies to all subcontractors and all BTI locations and job sites.

General Requirements

All BTI subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by BTI management. Approval requirements include:

- A formal safety review of the subcontractor being performed by BTI management.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations and requirements of BTI.
- The subcontractor agrees to abide by our Drug and Alcohol policy and onsite safety rules throughout the duration of the work.

Any subcontractor that has a “Non-Approved” safety status will not be used on any BTI site.

Procedure

Pre-Qualification of Subcontractors

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics.

Safety metrics, such as TRIR, EMR, DART, and Fatality Rate will be used as a criteria for selecting subcontractors.

BTI reserves the right to change a subcontractor’s status to “Non-Approved” if the subcontractor shows insufficient progress towards accepted mitigation plan or other agreed upon criteria.

Subcontractor Involvement

Contractors are required to follow or implement the work practices and systems described below while performing work at BTI worksites:

- Attend an safety orientation, pre-job meeting or kick-off meeting BTI prior to any work beginning
- Monitor employees for substance abuse and report nonconformities to BTI
- Ensure personnel have the required training and competency for their work
- Participate in tailgate safety meetings, job safety analysis or hazard assessments and safety inspections.
- Perform a pre-job safety inspection that includes equipment
- Participate in the hazard reporting system
- Report all injuries, spills, property damage incidents and near misses
- Comply with onsite and Owner Client safety rules
- Implement safety practices and processes as applicable
- Clean up and restore the worksite after the job is over
- Ensure compliance with regulations at all times

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- Post job safety performance reviews shall be conducted for subcontractors.

SUBCONTRACTOR SAFETY PRE-QUALIFICATION FORM

GENERAL INFORMATION				
1. Subcontractor Information:				
Subcontractor Name:		Telephone Number:		
Street Address:		Fax Number:		
City:		Website Address:		
Province/State:		Postal Code/Zip:		
2. Officers				
President:				
Vice President:				
Treasurer:				
3. How many years has your organization been in business under your present firm's name?				
4. Parent Firm Name:				
City:	Province/State:	Postal Code/Zip:		
Subsidiaries:				
5. Under current management since (Date): (please enter date as mm/dd/yyyy)				
6. Contact for Insurance Information:				
Title:	Telephone:	Fax:	Email:	
7. Insurance Carrier(s):				
Name		Type of Coverage		Telephone
8. Worker's Compensation Account Status (Please enclose a copy of your workers compensation insurance certificate.				
Account Number:		Industry Code:		
9. Contact for requesting bids:				
Title:	Telephone:	Fax:	Email:	
10. Contractor Evaluation form completed by:				
Title:	Telephone:	Fax:	Email:	

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HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE

Health, Safety and Environmental Performance

Provide the following data for your firm using your record keeping forms from the past three (3) years.

If the data is not available please reply with Not Available - N/A.

Safety Performance Definitions and Guidance

- a. **Hours Worked** Employee hours worked last three years. Please report actual scheduled total hours worked and total overtime hours worked. If actual hours worked are not available for certain individuals hours worked may be estimated. A default of 2000 hours per individual per year can be used as an estimate.
- b. **Recordable Incidents** Recordable cases are those that involve any work-related injury or illness, including death but excluding first-aid injuries.
- c. **Lost Workday Cases** A Lost Workday Case is a medical case that involves fatalities, days away from work cases or restricted work activity cases.
 - **Days Away from Work Case** Where the employee is away from scheduled work day one day or more after the day of a work related injury or illness. The day of the incident does not count as lost workday. Stop count when total days away and restricted duty days reach 180 or employee leaves the firm.
 - **Restricted Work Activity Case** Where the employee as result of work-related injury or illness:
 - ◊ Assigned to another job on a temporary or permanent basis or
 - ◊ Worked at their permanent job but less than a full day
 - ◊ Could not perform routine functions associated with their permanent job
 The day of the incident is not counted as a Restricted Duty day. Stop count when total days away or restricted duty days reach 180 or if employee leaves the firm.

Health and Safety Incidents	20__	20__	20__
a. Total Hours Worked			
b. Total Recordable Incidents # Fatalities # Medical Aids # Days Away from Work Cases # Restricted Work Activity Cases			
c. Total Recordable Incident Rate (TRIR) <u>Total # Recordable Incidents x 200,000</u> Total # Hours worked			
d. Lost Workday Cases (LWC) # Fatalities # Days Away from Work Case # Restricted Work Activity Case			
e. Lost Workday Incident Rate (LWDR) <u>Total # Lost Workday Incidents x 200,000</u> Total # Hours Worked			
Enforcement Actions	20__	20__	20__
<u>Citations</u> # Health and Safety # Environmental Please provide details			
<u>Fines</u> Total # Fines Total \$\$ Paid			

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Please provide details			
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HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT			
Highest ranking HSE professional in the firm:			
Name/Title:		Email:	
		Telephone Numbers	
Do you have a written Basic Safety / HSE Program?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Does your Basic Safety/HSE Program include the following?			
a. HSE Policy statement signed by management	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Management Involvement and Commitment	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Hazard Identification and Risk Control	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d. Rules and Work Procedures	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
e. Training	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
f. Communications	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
g. Incident and Accident Reporting and Investigation	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Does the program include work practices and procedures such as?			
a. Permit to Work including Isolation of Energy	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Confined Space Entry	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Injury and Illness Recording	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d. Fall Protection	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
e. Personal Protective Equipment	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
f. Portable Electrical/Power Tools	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
g. Motor Vehicle/Driving Safety	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
h. Compressed Gas Cylinders	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
i. Electrical Equipment Grounding Assurance	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
j. Powered Industrial Vehicles (Cranes, Forklifts, Etc.)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
k. Housekeeping	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
l. Accident/Incident Reporting and Investigations	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
m. Unsafe Condition Reporting	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
n. Emergency Preparedness, Including Evacuation Plan	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
o. Waste Disposal and Pollution Prevention	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
p. Regular Workplace Inspection / Audits	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Do you have a Drug and Alcohol program?			
a. Pre-employment Testing	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Reasonable Cause Testing	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Post-rehabilitation/Return to Work Testing	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

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Do you have a Job Safety Analysis (JSA) process in place?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT			
Is there a Root Cause Analysis process used for investigations, near misses, environmental spills?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you have a corrective action process for addressing individual/employee safety and health performance deficiencies?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you have personnel trained to perform first aid and CPR?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Personal Protective Equipment (PPE)			
a. Is applicable PPE provided for employees?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Do you have a program to assure that PPE is inspected and maintained?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
HSE Meetings			Frequency
a. Do you hold site HSE meetings for?			
• Field Supervisors	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• Employees	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• New Hires	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• Subcontractors	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

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HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT

Inspections and Audits			Frequency
a. Do you conduct internal HSE Inspections?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Do you conduct internal HSE program audits?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Are corrections or deficiencies to internal HSE program or equipment communicated and documented until closure?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Equipment and Materials:			
a. Do you own or lease Equipment and Materials? If yes, please complete the following questions:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Do you conduct inspections on operating equipment (e.g., cranes, forklifts) in compliance with regulatory requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Do you maintain operating equipment in compliance with regulatory requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d. Do you maintain the applicable inspection and maintenance certification records for operating equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
e. Do you document corrections or deficiencies from equipment inspections and maintenance?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Subcontractor Management			
a. Do you subcontract any work? If the answer is yes, please complete the following questions:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
b. Do you have a written contractor safety management process?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Do you use HSE performance criteria in selection of subcontractors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d. Do you evaluate the ability of subcontractors to comply with applicable HSE requirements as part of the selection process?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
e. Do your subcontractors have a written HSE Program?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
f. Do you include your subcontractors in:			
• HSE Orientation	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• HSE Meetings	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• HSE Equipment Inspections	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• HSE Program Audits	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• Are corrections or deficiencies documented	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

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HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT				
Employee and Trades Training				
a. Have employees been trained in appropriate job skills?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
b. Are employees' job skills certified where required by regulatory or industry consensus standards?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
c. List trades/crafts which have been certified:				
Health, Safety and Environmental Orientation				
a. Do you have an HSE Orientation Program for new hires and newly hired or promoted supervisors? b. Does the program provide instruction on the following: • New worker orientation • Safe Work Practices • Safety Supervision • Toolbox meetings • Emergency Procedures • First Aid Procedures • Fire Protection and Prevention • Safety Intervention • Hazard Communication/WHMIS	New Hires		Supervisors	
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Health, Safety and Environmental Training				
a. Do you know the regulatory training requirements for your employees?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
b. Have your employees received the required training and re-training	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
c. Do you have a specific HSE training program for supervisors?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
Training Records				
a. Do you have training records for your Employee's?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
b. Do the training records include the following: • Employee identification • Date of training • Name of trainer • Method used to verify understanding	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c. How do you verify understanding of training? (Check all that apply)				
<input type="checkbox"/> Written test <input type="checkbox"/> Oral test <input type="checkbox"/> Performance test <input type="checkbox"/> Job Monitoring <input type="checkbox"/> Other (List)				

Birmingham-Toledo, Inc.

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PART 46 MINER TRAINING PROGRAM

As per 30 CFR Part 46.3

This company intends to follow the training regulations as set forth in the Code of Federal Regulations Title 30, Part 46.3 dated October 1, 1999.

COMPANY NAME: Birmingham Toledo Inc.

MSHA ID# WDA

MAILING ADDRESS: 111 North Main Street Graysville, Alabama 35073

TELEPHONE: (205) 655-1881

SAFETY AND HEALTH DESIGNEE: Sam Tate

POSITION: Safety Director

PERSON RESPONSIBLE FOR TRAINING: Sam Tate

TITLE: Safety Director

NUMBER OF EMPLOYEES: 20

STATEMENT OF INTENT

Under Section 115 of the Federal Mine Safety and Health Act of 1977, each operator is required to train miners so that job duties may be performed safely.

So that employees may benefit fully from the training experience, courses should be mine and/or job specific in nature. Course work that provides specific information is both beneficial and meaningful to employees and employers.

The training sessions will be conducted by certified MSHA instructors and/or persons designated by the production operator/independent contractor as competent [as per 46.2(b)] to teach. This company may request assistance from: state, federal agencies; associations or production operators or independent contractors; miners' representatives; consultants; manufacturers' representatives; private associations; educational institutions; or other training providers that can qualify under 46.2(b).

The following instructors and/or organizations will provide the required training.

Instructor/organization	Subject areas competent to instruct
1. Bevill State Community College	<u>New Miner, Newly Hired Experienced Miner, Annual Refresher</u>
2. Bryan Eads_____	<u>New Miner, Newly Hired Experienced Miner, Annual Refresher, New Task</u>
3. Sam Tate_____	<u>New Miner, Newly Hired Experienced Miner, Annual Refresher, New Task</u>
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____
8. _____	_____
9. _____	_____
10. _____	_____

Note: All training must be conducted by a Competent Person and they shall be listed in this training plan as to what training and/or subjects they are competent to teach.

List others on a separate sheet of paper and attach it to this training plan.

This mine reserves the right to substitute, as applicable, health and safety training required by the Occupational Safety and Health Administration (OSHA), or other federal or state agencies to meet requirements under this part. This training must be relevant to subjects required in part 46 and must be documented in accordance with 46.9 of this part. [as per 46.(c)]

This training may consist of classroom instruction at the mine, interactive computer-based instruction or other innovative training methods, alternative training technologies, or any combination of training methods. [as per 46.4(d)]

Employee health and safety meetings, including informal health and safety talks and instruction, may be credited under this part toward either new miner training, newly hired Experienced miner training, or annual refresher training requirements. In such health and safety meetings only the portion of the session actually spent in training will be recorded in accordance with 46.9 of this part. [as per 46.4(e)]

TRAINING CATEGORIES AND TRAINING LOCATIONS

Training for the following categories will be provided in or at various classroom sites:

46.5 New Miner

46.6 Newly Hired Experienced Miner

46.8 Annual Refresher Training

Training for the following categories will be provided on the mine site:

46.7 New Task Training

46.11 Site-specific Hazard Awareness Training

Training programs and requirements for each category are enclosed.

CATEGORY: New Miner Training - 46.5

Except as provided in paragraphs (f) and (g) of section 46.5, each new miner will be provided with no less than 24 hours of training as prescribed by paragraphs (b), (c), and (d) of section 46.5. Miners who have not yet received the full 24 hours of new miner training will work where an experienced miner can observe that the new miner is performing his or her work in a safe and healthful manner. **All times listed are approximate in duration. Task Training will be used to satisfy portions of this part as described in 46.7(e).**

Course of Instruction:

The specific courses required under 30 CFR, Section 46.5(b) and additional mine specific courses will be taught to this category of miner. No less than four (4) hours of training in the following subjects, which must also address site-specific hazards, will be given before a new miner begins work at the mine. These courses include the following:

1. An introduction to the work environments.
2. Instruction on the recognition and avoidance of electrical hazards and other hazards present at the mine, such as traffic patterns and control, mobile equipment and loose or unstable ground conditions.
3. A review of the emergency medical procedures, escape and emergency evacuation plans in effect at the mine, and instruction on the fire warning signals and firefighting procedures.
4. Instruction on the health and safety aspects of the tasks to be assigned, including the safe work procedures of such tasks, **the physical and health hazards of chemicals** and the mandatory health and safety standards pertinent to such tasks.
5. Instruction on the statutory rights of miners and their representatives under the Act.
6. A review and description of the line of authority of supervisors and miners' representatives and the responsibilities of such supervisors and miners' representatives.
7. An introduction to company rules and procedures for reporting hazards.

Within 60 calendar days after a new miner begins work at the mine each miner will be provided with training in the following subjects as per 46.5(c):

1. Instruction and demonstration on the use, care, and maintenance of self-rescue and respiratory devices, if used at the mine; N/A
2. A review of first aid methods.

In accordance with 46.5(d) within 90 calendar days after a new miner begins work at the mine they will be provided with the balance, if any, of the 24 hours of training on any other subjects that promote occupational health and safety for miners at the mine.

NEW MINER TRAINING PROGRAM

4 Hours - Minimum

Course Title	**Est. Time	Location	Conducted By	Teaching Method	Course Material	Evaluation
<u>Section 46.5(b)(1)</u> Introduction to the work Environment	15 min to 8 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	Company Policy & Rules Maps & Plans Actual Equipment Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.5(b)(2)</u> Hazard Recognition and Avoidance	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	MSHA Manuals Company Policy & Rules Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.5(b)(3)</u> Emergency Medical Procedures, Escape and Emergency Evacuation Plans, Firewarning Signals & Firefighting Procedures	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	Mine Maps, Emergency Phone List, First Aid Book, Evacuation Plan and Escape Routes/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.(b)(4)</u> Health & Safety Aspects of Assigned Tasks including Physical and Health Hazards of Chemicals & Mandatory Health & Safety Standards Warning and Firefighting	15 min to 8 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	MSHA Manuals Company Policy & Rules, HazCom Program, Health & Safety Standards Visuals, Equipment Manuals (if applicable) Video/Computer	Written, Oral Testing Sequence and/or Job Performance

NEW MINER TRAINING PROGRAM

Surface Continued

Course Title	**Est. Time	Location	Conducted By	Teaching Method	Course Material	Evaluation
<u>Section 46.5(b)(5)</u> Statutory Rights of Miners and Their Representatives Under the Act	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	MSHA Manuals Company Policy & Rules The Act Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.5(b)(6)</u> Authority and Responsibilities of Supervisors and Miners' Representatives	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	MSHA Manuals Company Policy & Rules The Act Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.5(b)(7)</u> Company Rules and Procedures for Reporting Hazards	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	Company Policy & Rules Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.5(c)(1)</u> Respiratory Devices	N/A					
<u>Section 46.5(c)(2)</u> First Aid Methods	15 min to 8 hrs	Office/Mine Site or Other Location as Needed	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	First Aid Manuals First Aid Equipment & Supplies Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance

CATEGORY: Newly Hired Experienced Miner Training - 46.6

Except as provided in paragraph (f) of section 46.6, each newly hired experienced miner will be provided with training as prescribed by paragraphs (b), and (c) of section 46.6. **Part 46 does not specify a minimum length of time that must be devoted to this category of training. All times indicated are approximate in duration.**

Course of Instruction:

All courses required by 30 CFR, Section 46.6(b) will be taught before a newly hired experienced miner begins work at the mine. The following subjects, which also address site specific hazards, will be taught:

1. An introduction to the work environments.
2. Instruction on the recognition and avoidance of electrical hazards and other hazards present at the mine, such as traffic patterns and control, mobile equipment and loose or unstable ground conditions.
3. A review of the emergency medical procedures, escape and emergency evacuation plans in effect at the mine, and instruction on the firewarning signals and firefighting procedures.
4. Instruction on the health and safety aspects of the tasks to be assigned, including the safe work procedures of such tasks, **the physical and health hazards of chemicals** and the mandatory health and safety standards pertinent to such tasks.
5. Instruction on the statutory rights of miners and their representatives under the Act.
6. A review and description of the line of authority of supervisors and miners' representatives and the responsibilities of such supervisors and miners' representatives.
7. An introduction to company rules and procedures for reporting hazards.

Within 60 calendar days after a new miner begins work at the mine each miner will be provided with training in the following subjects as per 46.6(c):

1. Instruction and demonstration on the use, care, and maintenance of self-rescue and respiratory devices, if used at the mine. N/A

This mine reserves the right as indicated in 46.6(d) to use practice under the close observation of a competent person to fulfill the requirement for training on the health and safety aspects of an assigned task in paragraph (b) (4) of this section, if hazard recognition training specific to the assigned task is given before the miner performs the task.

NEWLY HIRED EXPERIENCED MINER TRAINING PROGRAM
Surface

Course Title	**Est. Time	Location	Conducted By	Teaching Method	Course Material	Evaluation
<u>Section 46.6(b)(1)</u> Introduction to the work Environment	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	Company Policy & Rules Maps & Plans Actual Equipment Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.5(b)(2)</u> Hazard Recognition and Avoidance	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	MSHA Manuals Company Policy & Rules Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.5(b)(3)</u> Emergency Medical Procedures, Escape and Emergency Evacuation Plans, Firewarning Signals & Firefighting Procedures	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	Mine Maps, Emergency Phone List, First Aid Book, Evacuation Plan and Escape Routes/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.(b)(4)</u> Health & Safety Aspects of Assigned Tasks including Physical and Health Hazards of Chemicals & Mandatory Health & Safety Standards Warning and Firefighting	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	MSHA Manuals Company Policy & Rules Health & Safety Standards Visuals, Equipment Manuals (if applicable) Video/Computer	Written, Oral Testing Sequence and/or Job Performance

NEWLY HIRED EXPERIENCED MINER TRAINING PROGRAM
Surface
Continued

Course Title	**Est. Time	Location	Conducted By	Teaching Method	Course Material	Evaluation
<u>Section 46.6(b)(5)</u> Statutory Rights of Miners and Their Representatives Under the Act	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d) As Per 46.4(d)	MSHA Manuals Company Policy & Rules The Act Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.6(b)(6)</u> Authority and Responsibilities of Supervisors and Miners' Representatives	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	MSHA Manuals Company Policy & Rules The Act Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.6(b)(7)</u> Company Rules and Procedures for Reporting Hazards	15 min to 2 hrs	Office/Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	Company Policy & Rules Health & Safety Standards Visuals/Video/Computer	Written, Oral Testing Sequence and/or Job Performance
<u>Section 46.6(c)</u> Respiratory Devices	As Needed	Mine Site	MSHA Approved Instructor or Competent Person Designated by the Operator	As Per 46.4(d)	Company Policy & Rules Health & Safety Standards Visuals Actual Equipment	Written, Oral Testing Sequence and/or Job Performance

CATEGORY: New Task Training - 46.7

Time:

There is no minimum time requirement in this category of training. *However, 46.3(b)(3) states that an approved training plan must contain an approximate time or a range of time to be spent on each subject area. The range of time stated for this subject area is a general starting point. Regardless of the range of time, sufficient training time must be spent so that the trainee is able to perform the task to the satisfaction of the operator or competent person. **Duration on time spent for each task will be recorded.***

Course of Instruction:

Training of miners assigned to new tasks for which they have no previous experience, or a change occurs in a miner's assigned task that affects the health and safety risks encountered by the miner, must include the following as listed in 30 CFR, Section 46.7.

1. Safety and Health Aspects, **(to include the physical and health hazards of chemicals)** and Safety Operating Procedures for Work Tasks, Equipment or Machinery (This training will be provided before the miner performs the new task); 15 min to 2 hrs
2. Practice - To be supervised by a competent person under close supervision either during light production or during non-production; (practice may be used to fulfill the requirement for task training under this section, if hazard recognition training specific to the assigned task is given before the miner performs the task.) 15 min to 2 hrs
3. Instruction on New or Modified Equipment or Machinery; 15 min to 2 hrs or as needed
4. Other courses (as might be required). 15 min to 2 hrs or as needed.

This mine reserves the right as indicated in 46.6(d) to use practice under the close observation of a competent person to fulfill the requirement for training on the health and safety aspects of an assigned task in paragraph (b) (4) of this section, if hazard recognition training specific to the assigned task is given before the miner performs the task.

SECTION 46.7 NEW TASK TRAINING

OUTLINE OF TRAINING PROCEDURES

TITLE: Heavy Capacity Truck Crane Operator

TASKS: Responsible for - Pre/Post operation inspection, Maintenance, Operation of Lift.

MATERIALS NEEDED: Operator's Manual, Company Policy for traffic rules and operation procedures, 30CFR and State standards, other technical publications as needed.

WHAT INSTRUCTOR WILL DO: Review company operating policy and traffic rules, Demonstrate operating controls, and safety devices, Demonstrate pre/post operational inspections, Demonstrate machine safe operation for lifting, swing area and other as needed, Review 30CFR and State standards, Explain inherent job hazards, Observe and give guidance to student during simulation and operation.

WHAT STUDENT WILL DO: Read operator's manual, Read company policy for operating procedures and traffic rules, Observe and listen to demonstrations and reviews, Simulate all steps of safe crane operation, lifting, pre/post inspections, cleaning and maintenance, as well as any other deemed necessary by instructor.

Evaluation Procedures: Student will give correct response to questions, successfully demonstrate knowledge of safe operating procedures for lifting loads, raising and lowering weights, emergency procedures, starting and shutting down machine, locking out machine for maintenance, maintenance procedures, and any other demonstration deemed necessary by instructor. The student will be observed by an experienced operator and supervised during light production and any retraining needed will be accomplished until the student can operate without significant error through five (5) error-free cycles.

Title(s) of Personnel Conducting Training: Experienced Heavy Capacity Truck crane operator, Supervisor/foreman

SECTION 46.7 NEW TASK TRAINING

OUTLINE OF TRAINING PROCEDURES

TITLE: Heavy Capacity Truck Driver

TASKS: Responsible for - Safe operation of the truck, proper fueling and lubrication of the truck, truck maintenance, pre/post operational inspections, and cleanup of the truck.

MATERIALS NEEDED: Company policy and operational procedures, 30CFR and State standards, Operator's manual.

WHAT INSTRUCTOR WILL DO: Review company operating policy and traffic rules, Demonstrate operating controls, gauges, and safety devices, Demonstrate pre/post operational inspections, Demonstrate fueling and lubricating procedures, Demonstrate safe operation procedures for traveling and other as needed, Review 30CFR and State standards, Demonstrate startup, shut down and lockout procedures, Explain inherent job hazards, Observe and give guidance to student during simulation and operation.

WHAT STUDENT WILL DO: Read operator's manual, Read company policy for operating procedures and traffic rules, Observe and listen to demonstrations and reviews, Simulate all steps of safe truck operation, pre/post inspections, startup, shut down and lockout, lubrication, cleaning and maintenance, as well as any other deemed necessary by instructor.

Evaluation Procedures: Student will give correct response to questions, successfully demonstrate knowledge of safe operating procedures, hand signals, emergency procedures, starting and shutting down truck, locking out truck for maintenance, proper fueling and lubricating of truck as well as maintenance procedures, and any other demonstration deemed necessary by instructor. The student will be observed by an experienced operator and supervised during light production and any retraining needed will be accomplished until the student can operate without significant error through four (4) error-free cycles.

Title(s) of Personnel Conducting Training: Experience truck operator, Supervisor/foreman

SECTION 46.7 NEW TASK TRAINING

OUTLINE OF TRAINING PROCEDURES

TITLE: Scale Service/Calibration Technician

TASKS: Responsible for - Scale and related equipment maintenance and calibration to include pre/post operational inspections, clean scales as needed, repairs as needed, adjustments of scales to as close to zero error as possible, preparation of all applicable reports, and cleanup.

MATERIALS NEEDED: Company policy and operational procedures, 30CFR and State standards, Operator's manual, service manuals, maintenance equipment, service truck, hand tools, MSD sheets, applicable reports and needed safety equipment.

WHAT INSTRUCTOR WILL DO: Review company operating policy and traffic rules, Demonstrate proper operation and explain need for safety devices, Demonstrate pre/post operational inspections, Demonstrate safe methods for cleaning, repairing and calibrating scales, Demonstrate safe operation of scale related equipment. Review 30CFR and State standards, Demonstrate startup, shut down and lockout procedures as needed, Demonstrate confined space procedures as needed, Explain inherent job hazards, Observe and give guidance to student during simulation and operation.

WHAT STUDENT WILL DO: Familiarize yourself with operator's procedures and traffic rules, Observe and listen to demonstrations and reviews, Simulate all steps of safe operation for traveling, pre/post inspections, startup, shut down and lockout as needed, safe methods of cleaning, maintenance, repairs and calibration as well as any other procedures deemed necessary by instructor.

Evaluation Procedures: Student will give correct response to questions, Successfully demonstrate knowledge of safe operating procedures, hand signals, emergency procedures, starting and shutting down related equipment as needed, lockout/tagout procedures for maintenance as needed, Confined Space procedures as needed, Safe methods of cleaning, maintenance, repairs and calibration as well as any other procedures deemed necessary by instructor. The student will be observed by an experienced technician and supervised during light production and any retraining needed will be accomplished until the student can operate without significant error through four (4) error-free cycles.

Title(s) of Personnel Conducting Training: Experience scale technician, Supervisor/foreman

SECTION 46.7 NEW TASK TRAINING

OUTLINE OF TRAINING PROCEDURES

TITLE: General Laborer

TASKS: Responsible for - Cleanup around scales and equipment, operate truck, general maintenance.

MATERIALS NEEDED: Company policy and operational procedures, 30CFR and State standards, Operator's manual.

WHAT INSTRUCTOR WILL DO: Review company operating policy and traffic rules, Demonstrate operating controls, gauges, and safety devices, Demonstrate pre/post operational inspections, Explain inherent job hazards, Observe and give guidance to student during simulation and operation.

WHAT STUDENT WILL DO: Read operator's manual, Read company policy for operating procedures and traffic rules, Observe and listen to demonstrations and reviews, Simulate all steps of safe operation for traveling, loading trucks, pre/post inspections, cleaning and maintenance, as well as any other deemed necessary by instructor.

Evaluation Procedures: Student will give correct response to questions, successfully demonstrate knowledge of safe operating procedures for cleaning up around scale equipment, loading trucks, traveling, hand signals, emergency procedures, and any other demonstration deemed necessary by instructor. The student will be observed by an experienced operator and supervised during light production and any retraining needed will be accomplished until the student can operate without significant error through four (4) error-free cycles.

Title(s) of Personnel Conducting Training: Experience general laborer, Supervisor/foreman

SECTION 46.7 NEW TASK TRAINING

OUTLINE OF TRAINING PROCEDURES

TITLE: Maintenance/Welder Personnel

TASKS: Responsible for - Scale and equipment maintenance to include welding/cutting and machining of parts, Safe operation welding machines, cutting torches and drills, proper fueling and lubrication of equipment, equipment maintenance, pre/post operational inspections, and cleanup.

MATERIALS NEEDED: Company policy and operational procedures, 30CFR and State standards, Operator's manual, Nonproductive machining equipment, maintenance equipment, welder, hand tools and MSD sheets.

WHAT INSTRUCTOR WILL DO: Review company operating policy, msd sheets, and traffic rules, Demonstrate operating controls, gauges, and safety devices, Demonstrate pre/post operational inspections, Demonstrate equipment safe operation, fueling and lubricating procedures, Demonstrate welding/cutting machine safe operation, traveling, proper use of hand tools, and other as needed, Review 30CFR and State standards, Demonstrate startup, shut down and lockout procedures, Explain inherent job hazards, Observe and give guidance to student during simulation and operation.

WHAT STUDENT WILL DO: Read operator's manual, Read company policy for operating procedures and traffic rules, Review MSD sheets, Observe and listen to demonstrations and reviews, Simulate all steps of safe machine operation, welding/cutting, traveling, pre/post inspections, shut down and lockout, lubrication, proper use of hand tools, cleaning and maintenance, as well as any other deemed necessary by instructor.

Evaluation Procedures: Student will give correct response to questions, successfully demonstrate knowledge of safe operating procedures for maintenance, welding/cutting, fueling and lubricating equipment, traveling, hand signals, emergency procedures, starting and shutting down machine, locking out machine for maintenance, as well as any other demonstration deemed necessary by instructor. The student will be observed by an experienced operator and supervised during light production and any retraining needed will be accomplished until the student can operate without significant error through three (3) error-free cycles.

Title(s) of Personnel Conducting Training: Experience Maintenance/Welder personnel, Supervisor/foreman

CATEGORY: Annual Refresher Training - 46.8

8 hours of instruction is required in this category. Each miner will receive this training no later than 12 months after the miner begins work at the mine. This mine reserves the right to periodically conduct training sessions such as training stated in 46.4(c) and the use of periodic safety meetings/talks (formal and informal) as set forth in section 46.4(e) of this part.

Course of Instruction:

Training methods will be as set forth in 46.4(d). All courses required by 30 CFR, Section 46.8(b) and 46.8(c) will be taught. This includes:

1. Instruction on any changes at the mine that could adversely affect the miner's health or safety –as need up to 8 hours.
2. Safety and Health subjects that are relevant to mining operations at the mine – 10 minutes up to 2 hours.

This mine reserves the right to combine subjects during the training session. The following recommended subjects will be utilized to complete the 8 hour time requirement as per 46.8(a). Selected subjects to fulfill the requirements will be recorded under "Health and Safety Subjects relevant to the mining operation". The range of times for each suggested subject will be 10 minutes to 2 hours with the exception of first aid methods. First aid methods, when taught, will range in time from 1 hour to 4 hours. The following subjects are recommended but are not limited to:

Applicable health and safety requirements including:

1. Mandatory Health and Safety Standards; including information about the physical and health hazards of chemicals in the miner's work area, the protective measures a miner can take against these hazards and the contents of the mine's HazCom program;
2. Transportation Controls and Communication Systems;
3. Escape and Emergency Evacuation Plans; Fire Warning and Fire Fighting;
4. Ground Conditions and Control;
5. Traffic Patterns and Control Going to and from the Mine;
6. Working in Areas of Highwalls;
7. Water Hazards, Pits, and Spoil Banks;
8. Illumination and Night Work;
9. First Aid;
10. Electrical Hazards;
11. Prevention of Accidents including training on hazards associated with the equipment that has accounted for the most fatalities and serious injuries at the mine;
12. Health;
13. Respiratory Devices;
14. Maintenance and repair;
15. Use of tools and equipment;
16. Other (as might be required)

ANNUAL REFRESHER TRAINING PROGRAM
Surface
8 Hours - Minimum

Course Title	**Est. Time	Location	Conducted By	Teaching Method	Course Material	Evaluation	Approx. Dates
<u>Section 46.8(b)</u> Instruction on changes at the mine that could adversely affect the miner's health or safety	¼ hour to 8 hours as per 46.8(b)	Office or Near Mine Site	Competent Person Designated by the Operator	As Per 46.4(d)	May include: Multimedia Equipment, Handouts, Standards, Company Policy, or other visuals and materials that is deemed necessary	Written, Oral Testing Sequence and/or Job Performance	As Per 46.4(e)
<u>Section 46.8(c)</u> Health & safety subjects relevant to mining operations at the mine	¼ hour to 8 hours as per 46.8(b)	Office or Near Mine Site	Competent Person Designated by the Operator	As Per 46.4(d)	May include: Multimedia Equipment, Handouts, Standards, Company Policy, or other visuals and materials that is deemed necessary	Written, Oral Testing Sequence and/or Job Performance	As Per 46.4(e)

The following recommended subjects will be utilized to complete the 8 hour time requirement as per 46.8(a). Selected subjects to fulfill the requirements will be recorded under “Health and Safety Subjects relevant to the mining operation”. The range of times for each suggested subject will be 10 minutes to 2 hours with the exception of first aid methods. First aid methods, when taught, will range in time from 1 hour to 4 hours.

1. Mandatory Health and Safety Standards for assigned tasks; **including information about the physical and health hazards of chemicals in the miner's work area, the protective measures a miner can take against these hazards, and the contents of the mine's HazCom program.**
2. Transportation controls, and communication systems
3. Escape and emergency evacuation plans; Fire prevention, warning, and fighting
4. First aid methods
5. Ground conditions and control
6. Traffic patterns and controls going to and from the mine site
7. Working in areas of highwalls
8. Water hazards, pits, and spoil banks
9. Illumination and nightwork
10. Electrical and other hazards
11. Prevention of accidents to include the process or equipment responsible for the most injuries and fatalities
12. Health
13. Explosives
14. Respiratory devices
15. Maintenance and repairs
16. The use of tools and other equipment
17. HazCom program
18. Other

CATEGORY: Site-Specific Hazard Awareness Training - 46.11

Time:

There is no time requirement placed upon this category of training. Sufficient time should be spent to assure that the trainee is aware of the hazards he/she might encounter. This should be accomplished within the range of time: **5 minutes to 1 hour**, but if needed, longer time will be allowed. **Duration of time spent on site-specific hazard awareness training will be recorded.**

Course of Instruction:

Subjects to be covered in this category of instruction are specified in 30 CFR, Section 46.11. This includes the following:

1. Hazard Recognition and Avoidance;
2. Emergency and Evacuation Procedures;
3. Health and Safety Risks;
4. Traffic Patterns and Control, and Restricted Areas;
5. Warning and Evacuation Signals, Evacuation and Emergency Procedures;
6. Other (as might be required)

Instructional methods may include written hazard warning, oral instruction, signs and posted warning, walk around training or a combination or other means that alert persons to site specific hazards specific to the mine.

TRAINING RECORDS: 46.9

Training certification will be kept on an MSHA Form 5000-23, or on a form that contains the information listed in 46.9(b). All records of training under paragraphs 46.9(c)(1) through 46.9(c)(5) will be certified under 46.9(b)(5) and a copy provided to the miner as specified in 46.9(d).

This operation reserves the right to record each training session as per 46.9(c)(1) through 46.9(c)(5) on a form in accordance with 46.9(b)(1) through 46.9(b)(4). Each record will be available for review. Documentation for site-specific hazard awareness training provided under 46.11 to persons who are not miners under 46.2 will be provided as per 46.9(I).

As per 46.9(h), training certificates and training records will be maintained for each currently employed miner during his or her employment, except records and certificates of annual refresher training under 46.8, which will be maintained for only two years. Copies of training certificates and training records will be maintained for at least 60 calendar days after a miner terminates employment.

Examples of training records:

PART 46.5 NEW MINER TRAINING RECORD

Miner's Full Name (print): _____

Mine or Contractor Name: _____ ID _____

30 CFR 46.5 Subjects	Course Length	Date	Competent Person	Location of Training	Miner's Initials
THE MINERS RECEIVED NO LESS THAN 4 HOURS TRAINING IN THE FOLLOWING, BEFORE BEGINNING WORK:					
(b)(1) Introduction to the Work Environment, mine tour, mining method/operation					
b)(2) Instruction on recognition & avoidance of electrical and other hazards					
(b)(3) Emergency procedures, escape, & firefighting					
(b)(4) Health & safety aspects of tasks assigned including physical and health hazards of chemicals					
(b)(5) Instruction on statutory rights of miners & their representatives					
(b)(6) Authority & responsibility of supervisors & miners' representatives					
(b)(7) Introduction to company rules & procedures for reporting hazards					
Total Hours:					

NO LATER 60 DAYS:

(c)(1) Self rescue, respiratory devices, if applicable					
(c)(2) First Aid					

NO LATER THAN 90 DAYS (BALANCE OF 24 HOURS INCLUDING THE FOLLOWING SUBJECTS):

False certification is punishable under section 110(a) and (f) of the Federal Mine Safety and Health Act.

I certify that the above training has been completed.

(Signature of person responsible for health and safety training on the training plan)

(Date)

PART 46.6 NEWLY-HIRED EXPERIENCED MINER TRAINING RECORD

Miner's Full Name (print): _____

Mine or Contractor Name: _____ ID _____

30 CFR 46.6 Subjects	Course Length	Date	Competent Person	Location of Training (Name & Address if institution)	Miner's Initials
(b)(1) Introduction to the Work Environment, mine tour, mining method/operation					
b)(2) Instruction on recognition & avoidance of electrical and other hazards					
(b)(3) Emergency procedures, escape, & firefighting					
(b)(4) Health & safety aspects of tasks assigned including physical and health hazards of chemicals					
(b)(5) Instruction on statutory rights of miners & their representatives					
(b)(6) Authority & responsibility of supervisors & miners' representatives					
(b)(7) Introduction to company rules & procedures for reporting hazards					
Total Hours:					

NO LATER 60 DAYS:

(c)(1) Self rescue, respiratory devices, if applicable					
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False certification is punishable under section 110(a) and (f) of the Federal Mine Safety and Health Act.

I certify that the above training has been completed.

(Signature of person responsible for health and safety training on the training plan)

(Date)

PART 46.7 TASK TRAINING RECORD

Miner's Full Name (print): _____

Mine or Contractor Name: _____ ID _____

Job Title:

Miner received the following training before performing a new task, or a change occurred in an assigned task that affects health and safety risk.

New Task	Course Length	Competent Person	Location (Name, Address if institution)	Date	Miner's Initials

False certification is punishable under section 110(a) and (f) of the Federal Mine Safety and Health Act.

I certify that the above training has been completed.

(Signature of person responsible for health and safety training on the training plan)

(Date)

PART 46.8 ANNUAL REFRESHER TRAINING RECORD

Miner's Full Name (print): _____

Mine or Contractor Name: _____ ID _____

30 CFR 46.8 Subjects	Course Length	Date	Competent Person	Location of Training (Name & Address if institution)	Miner's Initials
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Each miner received no less than 8 hours of annual refresher training in the following subjects:

Instructions on changes at the mine that could adversely affect the miner's health or safety					
Health & safety subjects relevant to mining operations at the mine					

Subjects [For recommended subjects see 46.8(c) of this training plan]

Total Hours:					

False certification is punishable under section 110(a) and (f) of the Federal Mine Safety and Health Act.

I certify that the above training has been completed.

(Signature of person responsible for health and safety training on the training plan)

(Date)

**PART 46.11 SITE-SPECIFIC HAZARD AWARENESS TRAINING
CERTIFICATE**

Miner's Full Name

(print): _____

Mine or Contractor

Name _____

ID Number _____ **Date of Training** _____

Location: _____ **Mine Site** _____

Length of Training: _____

Competent Person Providing Training: _____

Miner's Initials: _____

(initial only on completion of training)

False certification is punishable under section 110(a) and (f) of the Federal Mine Safety and Health Act.

I certify that the above training has been completed.

(Signature of person responsible for health and safety training on the training plan)

(Date)

Surface Areas of Underground & Surface Mines

Part 48 - Subpart B

1. Company Name Birmingham-Toledo, Inc. Mailing Address 111 North Main St
City Graysville State AL Zip 35073
Mine Name _____ MSHA ID No. WDA Mine Location/County Jefferson

2. Person(s) responsible for Health and Training of the mine:

Name Sam Tate Position _____ Safety Control Mgr Telephone No. 205-655-1881

3. MSHA approved instructors - see next page

4. Approximate number of employees attending each training session: Varies.

5. Maximum number of employees attending each session: 30

6. Location where training will be given: varies

7. The predicted time or periods of time when regularly scheduled refresher training will be given: Annually
length of each session 8 hours

Bevill State Community College

MSHA Approved Instructors:

Name:	MIN Number:	Courses Approved to Teach:
Ken Russell	M06441014	All Subjects
Ronnie McCarty	M45139659	All Subjects
Charles A. Scott	M47349497	All Subjects
William Moore	M36066946	All Subjects
Jeffrey Lollar	M33725870	All Subjects
Gerald Kimes	M06526117	All Subjects
Kenneth Ely	M12451530	All Subjects
Benny C. Sivley	M75323190	All Subjects
Danny Rhodes	M57448748	All Subjects
Samuel R. Latham, Jr.	M98745982	All Subjects

PART 48.25 TRAINING PROGRAM FOR NEW MINERS – SURFACE

- A. Each new miner will receive no less than 24 hours of training as prescribed in section 48.25.
- B. Request that part of New Miner Training be given after work assignment?
1. Yes No If yes, give justification Good Safety Record
consideration will only be given to the following factors: mine size, mine safety record and rate of employee turnover.
2. Hours of training to be given before assignment to work duties:
(Minimum of 8) 8
- A. All courses will be taught by an MSHA approved instructor.
- B. Courses to be covered during this pre-assignment training:
1. Introduction to Work Environment.
 2. Hazard Recognition – including Electrical Hazards & other Hazards, Mobile Equipment, Ground Control Conditions, and Traffic Control Conditions.
 3. Health and Safety Aspects to Task to be Assigned.

CERTIFIED PERSON(S)

COURSES	TEACHING METHOD(S)	SCHEDULE(S) OF TRAINING	LOCATION(S) OF TRAINING
Tasks Performed by Certified Persons	Audio Visuals, Lecture, Discussion, & Demonstration	Annually	Mine Site and/or Company Training Center
First Aid	Audio Visuals, Lecture, Discussion, & Demonstration	Annually	Mine Site and/or Company Training Center
Provisions of Part 77	Audio Visuals, Lecture, Discussion, & Demonstration	Annually	Mine Site and/or Company Training Center

1. Initial training for Certified persons will be satisfied by a State Program.
2. Supervisors will receive no less than 10 hours of Initial First Aid Training and, thereafter, selected supervisors will receive a minimum of 5 hours refresher training annually. (77.1705, 77.1706)

QUALIFIED PERSON(S)

COURSES	TEACHING METHOD(S)	SCHEDULE(S) OF TRAINING	LOCATION(S) OF TRAINING
Methane Testing (77.101)	Discussion, Demonstration, and Lecture	Annually	Mine Site and/or Company Training Center
Hoisting (77.105)	Discussion, Demonstration, and Lecture	Annually	Mine Site and/or Company Training Center
Impoundments (77.216-3)	Discussion, Demonstration, and Lecture	Annually	Mine Site and/or Company Training Center

New Miner Training -- Surface -- Part 48.25

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Course	Approximate Time	Methods	Material	Course Evaluation Method
Instruction in the statutory rights of miners and their representatives	15 minutes To 2 hours	Lecture and Discussion	MSHA Guides, Handouts, Videos, and Workbooks	Oral response & discussion. Questions & Answers
Authority and Responsibility of Supervisors	15 minutes To 2 hours	Lecture and Discussion	MSHA Guides Workbooks	Oral response & discussion. Questions & Answers
Self-Rescue and Respiratory Devices	15 minutes To 2 hours	Lecture and Discussion Demonstration	MSHA Guides Manufactures info on Respirators. Videos & Workbooks	Oral response & discussion. Questions & Answers Demonstration
Transportation controls and communication systems	15 minutes To 2 hours	Lecture and Discussion	MSHA Guides, Videos. Workbooks	Oral response & discussion Questions & Answers
Introduction to the work environment	15 minutes To 8 hours	Lecture and Discussion	May include audiovisuals, handouts, and safety manual. Mine Maps	Oral response & discussion Questions & Answers
Escape and emergency evacuation plan, fire warning, fire fighting, emergency medical procedures	15 minutes To 2 hours	Lecture and Discussion	May include audiovisuals, handouts, fire ext. MSHA Guidelines. Videos Workbooks	Oral response & discussion. Questions & Answers Demonstration
Health and Safety aspects of the tasks to be assigned	15 minutes To 8 hours	Class Discussion and Demonstration	General Guidelines Task Training MSHA Guidelines	Student must exhibit task safety awareness from this and any prior task training. Observation and Oral Response

New Miner Training – Surface – Part 48.25

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Course	Approximate Time	Methods	Material	Course Evaluation Method
Hazard Recognition. Electrical Hazards, Lockout/Tagout, Confined Spaces. Haul roads, etc.	15 minutes To 2 hours	Lecture and Discussion Demonstration	Federal Regulations Ground Control Plan Video. MSHA Guidelines, Lockout & Tagout Equipment & Procedures. Workbook	Oral response & discussion. Questions & Answers
Health	15 minutes To 2 hours	Lecture and Discussion	May include audiovisuals, handouts, workbooks, health plans & MSHA Guidelines	Oral response & discussion. Questions & Answers
Introduction to rules and procedures for reporting hazards First Aid	15 minutes To 2 hours 15 minutes To 8 hours	Lecture and Discussion Class Lecture, & demonstration, & participation	Audiovisuals, handouts. Mine site hazard training materials & mine rules. Federal & State standards. Company policies. Audiovisuals, workbooks, CPR/FA manuals & equipment	Oral response & discussion. Questions & Answers Oral response & discussion Questions & Answers
Explosives	15 minutes To 2 hours	Class Lecture and Discussion	Audiovisuals, handouts, workbooks, inert explosive training aids. Mine site hazard training material	Oral response & discussion Questions & Answers
Ground Control: Working in areas of highwalls, water hazards, pits and spoil banks, illumination and night work.	15 minutes To 2 hours	Class Lecture, and discussion. Mine site instructional tour	Federal & State standards. Company policies. Audiovisuals. MSHA Guidelines. Workbooks & Ground Control Plans	Oral response & discussion. Questions & Answers

Experienced Miner Training – Surface – Part 48.26

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Course	Approximate Time	Methods	Material	Course Evaluation Method
Instruction in the statutory rights of miners and their representatives	15 minutes To 2 hours	Lecture and Discussion	MSHA Guides, handouts, videos & workbooks	Oral response & discussion. Questions & Answers
Authority and Responsibility of Supervisors	15 minutes To 2 hours	Lecture and Discussion	MSHA Guides, Workbooks	Oral response & discussion. Questions & Answers
Transportation controls and communication systems	15 minutes To 2 hours	Lecture and Discussion	MSHA Guides, Video, Workbooks	Oral response & discussion. Questions & Answers
Introduction to the work environment	15 minutes To 8 hours	Lecture and Discussion Site Tour	Audiovisuals, handouts, and company safety manual. MSHA Guides	Oral response & discussion Questions & Answers
Escape and emergency evacuation plan, fire fighting, emergency medical procedures	15 minutes To 2 hours	Lecture and Discussion	Audiovisuals, handouts, fire ext., MSHA Guidelines, escape maps & workbooks	Oral response & discussion Questions & Answers
Health and safety aspects of the tasks to be assigned	15 minutes To 8 hours	Class Discussion, Lecture and Demonstration	General Guidelines, Task Training, MSHA Guidelines. Videos & Workbooks	Student must exhibit task safety awareness from this and any prior task training. Observation
Ground Control: Working in areas of highwalls, water hazards, pits and spoil banks, illumination and night work	15 minutes To 2 hours	Class Lecture and discussion. Mine site instructional tour	Federal & State standards. Audiovisuals, handouts. Mine site hazard training material. Workbooks	Oral response & discussion. Questions & Answers

Experienced Miner Training – Surface – Part 48.26

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Course	Approximate Time	Methods	Material	Course Evaluation Method
Hazard Recognition, Electrical, Lockout/Tagout, Confined Spaces, Haul Roads, etc.	15 minutes To 2 hours	Lecture and Discussion	Federal Regulations, Ground Control Plans, videos & workbooks. MSHA guidelines, lock & tag equipment	Oral response & discussion. Questions & Answers
Mandatory Health & Safety Standards	15 minutes To 2 hours	Lecture and Discussion	Audiovisuals, handouts, MSHA guidelines. Workbooks	Oral response & discussion. Questions & Answers
Prevention of Accidents	15 minutes To 2 hours	Lecture and Discussion	Accident records. Audiovisuals, handouts, MSHA guidelines. Workbooks	Oral response & discussion. Questions & Answers
Health	15 minutes To 2 hours	Lecture and Discussion	Audiovisuals, handouts, MSHA guidelines. Workbooks	Oral response & discussion Questions & Answers

PART 48.27 TRAINING

OUTLINE OF TRAINING PROCEDURES

FOR

NEW TASK TRAINING -- SURFACE

Miners who are assigned to a new task in which they have had no previous experience will be trained in the safety and health aspects and safe work procedures of the task as specified in Section 48.27 prior to performing such task. Such training will include the following:

TITLE: All job titles listed on attached matrix

TASKS: As listed on attached matrix

WHAT INSTRUCTOR WILL DO: DEMONSTRATE AND DISCUSS

1. Review company policy and rules with the trainee.
2. Give instruction in the health and safety aspects and safe operating procedures for work tasks, equipment or machinery.
3. Give instructions in safe operations procedures applicable to new or modified machines or equipment to be installed or put into operation in the mine in which require new or different operating procedures.
4. Give instruction for all new tasks in the safety and health aspects and safe work procedures of the task, prior to performing such task.
5. Give training in an on-the job environment.

WHAT TRAINEE WILL DO:

1. Read company policies and rules applicable to the task.
2. Observe, listen to, and participate in all demonstrations and discussions.
3. Attain proficiency through supervised practice during nonproduction or supervised operation during production.

EVALUATION: DEMONSTRATION AND ORAL RESPONSE

TITLES OF PERSONNEL CONDUCTING TRAINING: BEVILL STATE INSTRUCTORS

Surface Mines and Surface Areas of UG Mines	Estimated Time	Bull Dozer Operator	Front-end & backhoe Loader Operator	Truck Driver	Laborer	Repairman/Mechanic	Night Watchman	Road Grader Operator
Load Trucks	15 min. - 2 hrs		X	X				
Emergency Maintenance & Repairs	15 min. - 2 hrs					X		
Change Tires on Mobile Equipment	15 min. - 2 hrs		X	X	X	X		X
Rough Carpentry	15 min. - 2 hrs			X	X			
Proper Lifting Procedures	15 min. - 2 hrs	X	X	X		X		X
Use Hand Tools	15 min. - 2 hrs	X	X	X	X	X	X	X
Shoveling	15 min. - 2 hrs				X		X	
Clean-Up	15 min. - 2 hrs	X	X	X	X	X	X	X
Operate Trucks	15 min. - 2 hrs		X	X	X	X	X	
Maintenance Equipment & Machine	15 min. - 2 hrs					X		
Fuel Mobile Equipment	15 min. - 2 hrs	X	X	X	X	X	X	X
Lubricate Machinery	15 min. - 2 hrs	X	X	X	X	X		X
Install Parts, Equipment & Batteries	15 min. - 2 hrs					X		
Weld, Braze, etc.	15 min. - 2 hrs					X		
Electrical Repairs	15 min. - 2 hrs					X		
Operate Mobile Equipment	15 min. - 2 hrs	X	X	X	X	X	X	X
Remove Rock from Belt Conveyor	15 min. - 2 hrs	X	X	X	X			
Pre/Post operation check equipment	15 min. - 2 hrs							
Start/Stop Fan	15 min. - 2 hrs							

Annual Refresher Training – Surface – Part 48.28

Page 1 of 2

Course	Approximate Time	Methods	Material	Course Evaluation Method
Self-Rescue and Respiratory Devices	15 minutes To 2 hours	Lecture and Discussion Demonstrations	Manufactures recommendations & MSHA Guidelines. Fit test equipment, respirator/self rescuer, & workbooks	Questions and Answers and/or written test. Demonstration & fit test
Transportation controls and communication systems	15 minutes To 2 hours	Lecture and Discussion or Practical Demonstration	Audiovisuals, written materials, MSHA Guides and workbooks	Oral Response & Written Test
Escape and Emergency evacuation plan, fire warning and fire fighting	15 minutes To 2 hours	Lecture and Discussion	Audiovisuals or written materials, MSHA guidelines, Fire extinguisher & workbooks	Oral response & discussion Questions & Answers Demonstration
Ground control plans; working in areas of highwalls, pits, spoil banks, illumination and night work	15 minutes To 2 hours	Lecture and Discussion	MSHA and State guidelines, Company policy, Ground Control Plans, videos & workbooks	Questions & Answer and/or written test
First Aid	15 minutes To 2 hours	Lecture and Discussion Class Participation	American Heart Assn., Red Cross, Nat'l Safety Counsel handouts, manikins, first aid equipment & workbooks. MSHA Guidelines	Question & Answer and/or written test
Electrical Hazards	15 minutes To 2 hours	Lecture and Discussion	Applicable Regulations. MSHA policies and guidelines. Lock & tag equipment & workbooks	Questions & Answer and/or written test

Annual Refresher Training – Surface – Part 48.28

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Course	Approximate Time	Methods	Material	Course Evaluation Method
Prevention of Accident	15 minutes To 2 hours	Lecture & Discussion	Audiovisuals, 30CFR manual and handouts. MSHA guidelines. Workbooks	Oral response & discussion. Questions & Answers
Mandatory Health & Safety Standards	15 minutes To 2 hours	Lecture & Discussion	MSHA and State Guidelines. Workbooks	Oral response & discussion. Questions & Answers. Written Test
Explosives	15 minutes To 2 hours	Lecture & Discussion	MSHA and State Guidelines. Mine site policies. Workbooks	Oral response & discussion. Questions & Answers. Written Test
Health	15 minutes To 2 hours	Lecture & Discussion	Federal Regulations. MSDS' Specific mine site regulations. Workbooks	Oral response & discussion. Questions & Answers

Hazard Training – Surface – Part 48.31

Subject 48.31 Site Specific Training/Surface	Approximate Time	Methods	Material	Course Evaluation Method
Hazard Recognition and Avoidance	15 minutes To 2 hours	Lecture & Discussion And/or reading checklist	Mine hazards and avoidance procedures, company rules and policies, checklist if applicable and signs	Oral response & discussion. Questions & Answers Written test(s)
Emergency and evacuation procedures	15 minutes To 2 hours	Lecture & Discussion And/or reading checklist	Mine map and checklist, if applicable	Oral response & discussion Questions & Answers. Written Test(s)
Health & Safety Standards, safety rules & safe working procedures	15 minutes To 2 hours	Lecture & Discussion And/or reading checklist	30 CFR, Parts 47, 56 & 62, company safety rules and checklists, if applicable	Oral response & discussion Questions & Answers Written Test(s)
Self-rescue and respiratory devices	15 minutes To 2 hours	Lecture & Discussion And/or reading checklist	Models of applicable equipment and devices, and checklists, if applicable Demonstration	Oral response and/or demonstration

**Birmingham Toledo Inc.
Safety & Health
Management System**

**Managers & Supervisors
Guide to Safety**

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Foreword Material

Introduction

We are counting on all of our employees to take a safety first attitude and your role as part of the Birmingham Toledo Inc. management team is vitally important, and therefore, expected. We simply cannot achieve our goals of safety unless safety is given the ultimate priority.

Employee health and safety has a financial impact. For every work-related cut, strain, or any other injury, both the injured person and everyone at the site is affected. Insurance costs create additional costs that directly effect profits.

It is your responsibility to follow the policies and procedures contained in this manual. By doing so, you can take pride in knowing that your efforts will contribute to the overall success of our company and achieve our health and safety objectives.

Each Birmingham Toledo Inc. manager shall receive a copy of the Managers & Supervisors Guide and complete the documentation of training.

How to Make Best Use of this Guide

Use this guide to:

- Be in compliance with safety and health laws as well as Birmingham Toledo Inc. policies and procedures.
- Know your duties and responsibilities as a Birmingham Toledo Inc. manager or supervisor related to safety and health.
- Control losses that will affect the profitability of our operations.

This guide has been developed to provide you with a quick reference to the tools needed to be in compliance with our health and safety requirements. Specific and measurable manager and supervisor duties are enclosed in an orange box for each major section. The Safety Manager or designated person for your area will work closely with you as a source of information, guidance and support.

Documentation of Manager's & Supervisor's Guide Training

At the end of the Manager's & Supervisor's Guide is a brief written exam that needs to be completed and submitted to your Safety Manager or designee as soon as possible. The Manager's & Supervisor's Guide is the only source document you will need to complete the written exam.

Health and Safety Policy

The objective of the Birmingham Toledo Inc. Health & Safety Policy is to state its commitments to provide safe and healthy working conditions. It outlines the steps that are taken to meet these commitments and provides support for the Birmingham Toledo Inc. Health & Safety Management System.

Birmingham Toledo Inc. Health & Safety Policy

Management is committed to providing its employees with the safest and healthiest work environment possible. The purpose and goal of the health and safety program is to provide a positive working environment and an injury free workplace for all employees.

- ensuring hazards are identified and appropriately controlled,
- creating an environment that promotes active employee participation in health and safety-related activities, and
- ensuring that health and safety-related initiatives are adequately resourced.

Employees are responsible for:

- working safely,
- ensuring their co-workers are protected and work safely,
- assisting in the identification of health and safety issues and concerns, and
- participating in activities or programs initiated by the municipality that enhance health and safety.

Contractors are responsible for:

- working safely,

- complying with all municipal policies regarding contract instructors,
- assisting in the identification of health and safety issues and concerns, and
- participating in activities or programs initiated by the municipality that enhance health and safety.

President

Safety and Health Responsibilities

President

Ultimate authority and responsibility for the SHMS lies with the President. The President ensures that adequate resources are available to accomplish the goals of the Birmingham Toledo Inc. SHMS and that the system is incorporated in the day-to-day conduct of business.

Service Manager

The Service Manager is responsible for ensuring development, implementation and maintenance of the safety and health management system. Responsibilities include, but are not limited to:

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all Birmingham Toledo Inc. and client safety policies and procedures;
- Conducting incident analysis to identify incident trends;
- Ensuring that investigations are conducted and conducting site safety inspections;
- Developing technical guidance and programs to identify worksite hazards;
- Ensuring monthly safety meetings are conducted and documented;
- Assuring that safety devices and PPE are available and properly utilized;
- Promptly addressing safety concerns and issues brought to their attention by employees;
- Assuring that injuries/illnesses are treated promptly and management being notified immediately;
- Assisting in investigating all incidents and near misses;
- Assuring that no unsafe condition exists in their area of responsibility;
- Assuring that employees are properly oriented and trained for hazards and equipment at their location;
- Performing safety orientations and documenting the orientation before allowing any employee to begin work at their location.

Managers and Supervisors Responsibilities

- Ensure employees are trained prior to beginning work or a task they are not familiar with.
- All employees are required to attend safety meetings.
- Enforce safety rules consistently.

All Employees

Working safely is a condition of employment. Each employee has personal responsibility and accountability for safety on the job. All employees are responsible for:

- Following all Birmingham Toledo Inc. and client safety policies and procedures and to perform assigned work duties in a safe manner and reporting all injuries, damage to any property or environmental concern.

- Stopping work immediately if they consider conditions or work methods to be unsafe and notifying their supervisor of the problem;

Site Specific HSE Plan

Some work locations will have a site specific HSE plan (SSHP). Each employee reporting to a location requiring site specific plans shall receive an orientation that includes the SSHP for that site and the employee will complete a Site Specific HSE Orientation Form regarding its contents.

The SSHP contains specific safety responsibilities and accountabilities, incident reporting procedures, safety observation process, safe work practices, PPE requirements, an Emergency Response Plan as well as the worksite hazard assessment for that location.

Incidents and Investigations

The following must be reported to the employee's supervisor immediately. If that person is not available then the Birmingham Toledo Inc. Safety Manager shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment or assets;
- Work related injuries or illnesses;
- Property damage including vehicle incidents;
- Hazardous chemical spillage, loss of containment and contamination;

All injuries must be reported to the Birmingham Toledo Inc. Safety Manager. In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Managers and Supervisors Responsibilities

- All employees need a safety orientation before beginning work.
- Employees are required to report unsafe conditions or acts.
- Notify the Birmingham Toledo Inc. Safety Manager of any injury immediately.
- Employees knowingly violating safety rules or procedures must be held accountable for their behavior.

Disciplinary System

It is the responsibility of each and every person employed by Birmingham Toledo Inc. to work in a safe and efficient manner. The safety system provides guidelines and procedures to help insure that safe work practices are observed. In the event that any employee violates provisions of the Birmingham Toledo Inc. safety system or works in a manner that threatens his own health and safety or the health and safety of the employees around him, he will be subject to disciplinary action.

Non-Job Related Injury or Medical Notification

All employees are required to notify their immediate supervisor BEFORE reporting to work or prior to using transportation to get to work if they have been involved in an injury, surgery or other medical condition that would affect their ability to fully perform their normal job.

As well, each employee is required to notify their direct supervisor BEFORE reporting for work or prior to using transportation to get to work if they are taking any prescription or medication that would affect their ability to perform their job safely.

The supervisor shall immediately contact the Safety Manager to discuss the injury or medication.

Hazardous Chemicals

Hazardous chemicals present at sites are described in SDSs available to employees as part of the Birmingham Toledo Inc. HAZCOM Program. No hazardous chemical may be used without the proper SDS being reviewed. Do not bring chemicals onto a client location without their prior permission. Prior to allowing use a hazardous chemical an SDS sheet must be placed into the SDS file. Every six months the site Service Managers shall review the hazardous Chemicals List for accuracy and remove any sheets of chemicals no longer in use.

Safe Work Practices

Additional work practices are contained in the site specific HSE plans based on local operating requirements. Key safe work practices include:

- It is the responsibility of each employee to perform his or her job in accordance with the requirements of the Birmingham Toledo Inc. Safety & Health Management System and client safety requirements.
- Fall protection must be used when employees are working with the potential to fall more than 6 feet. See Fall Protection Procedure for more details
- No equipment shall be operated unless the employee has received proper training by the supervisor.
- Tools and equipment damaged during use must be replaced or repaired only by a qualified person or company. See Hand and Power Tools Procedure for more details
- As tasks are completed, or at the end of each work shift time is allowed for cleanup of tools, debris, etc. to keep the site clean and free of accumulated debris.

Managers and Supervisors Responsibilities

- Make sure all chemicals are approved and there is a MSDS available.
- Fall protection must be used if employees work more than 6 feet above a lower working surface.
- Ensure employees report damaged tool and maintain safe housekeeping practices.

Driving Safety

Operators of Birmingham Toledo Inc. or client vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.

Employees driving requirements include:

- Obey all driving laws or regulations as well as requirements of clients;
- Immediately report any citation, warning, vehicle damage or near miss associated with company or client vehicle operation to the supervisor;

Managers and Supervisors Responsibilities

- Ensure vehicles are properly licensed and registered.
- Ensure all drivers have the appropriate driver's license and are valid.
- Ensure a first aid kit present for all vehicles other than a standard passenger car.

- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by all occupants during the operation of any vehicle;
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that may approach them;
- Avoid backing when possible by planning ahead. Always back up with the minimum amount of space needed.
- When speaking with a passenger, always keep your eyes on the road;
- Drive for conditions, not just the speed limit;
- Alcohol or illegal drugs are not allowed to be in a company, client or leased vehicle at any time.

Emergency Preparedness

Each Birmingham Toledo Inc. site must have an Emergency Response Plan (ERP) which advises of emergency procedures to protect life, minimize danger of exposure to personnel and to protect property at the facility. The ERP shall be used as a training tool for all Birmingham Toledo Inc. personnel and be made available to all employees.

- Have a list of local emergency responders and services ready.
- Provide emergency assistance, as needed and qualified for;
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident;
- Notify management by phone;
- Identify potential witnesses;
- Use investigation tools, as needed (camera, drawings, video, etc.);
- Tag out for evidence any equipment that was involved;
- Interview witnesses (including the effected employee) and obtain written, signed statements and fax to the Safety Manager and send hard copy immediately to the Safety Manager;
- Implement any immediate corrective actions needed;

Inspections

The Safety Manager or his designee conducts formal inspections (scheduled or unannounced).

Personal Protective Equipment

Eye and Face Protection

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapors.

Head Protection

Employees must wear protective hard hats when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects.

Managers and Supervisors Responsibilities

- Ensure all employees have the proper PPE appropriate for the work they are performing.
- Anticipate PPE supplies and please don't run out as the employees shall not work without the appropriate PPE.

Foot Protection

Employees must wear protective footwear when working in areas where there is a danger of foot injuries.

Hand Protection

Employees must wear the proper type of gloves based on the hazard – cotton gloves offer no protection against chemicals.

Fall Protection

Fall protection must be provided when employees are exposed to a vertical fall of six feet or more over a lower level.

Respiratory Protection

The use of respirators is not allowed unless approved by the Safety Manager who will insure all legally required respiratory protection procedures are completed. Product substitution is required to eliminate hazards protected by respirators.

Documentation

I have read, understand and will comply with the requirements of the Birmingham Toledo Inc. Manager & Supervisor Guide to the Birmingham Toledo Inc. Safety & Health Management System. Upon completion please turn this page into your Safety Manager or designee. Incorrect answers will be corrected and discussed with you.

Printed Manager or Supervisor's Name: _____

Signature & Date _____

REFER TO THE GUIDE FOR ANSWERS

1. The objective of the Birmingham Toledo Inc. Health & Safety Policy is to state its commitments to provide _____ and _____ working conditions.
2. Discuss the health and safety during employee orientation and _____ meetings.
3. Working safely is a condition of _____.
4. Ensure employees are _____ prior to beginning work or a task they are not familiar with.
5. Fall protection must be used when employees are working with the potential to fall more than _____ feet.
6. All employees are required to report _____ conditions or _____.
7. Employees knowingly violating safety rules or procedures must be held _____ for their behavior.
8. Ensure all injuries are reported _____ by supervisors.
9. Ensure all employees have the proper _____ appropriate for the work they are performing.
10. Ensure all employees are properly _____ to work with hazardous chemicals.

Feel free to add more content to the Guide and additional questions as you wish.

This page is to be placed in the employee's training file.