

	Title: Health and Safety Plan	Date: October 30, 2002	Rev: 2
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1. Statement of Policy

ETI Professionals, Inc. (ETI) is committed to providing a healthy and safe work environment for all our employees. These commitments can only be met through the awareness and cooperation of all employees. Each employee has a responsibility to work safely and in accordance with applicable regulations, abide by the Client's health and safety policies and procedures as it impacts their job responsibilities, and immediately communicate with management regarding all health and safety questions or concerns.

2. Purpose

The purpose of the plan is to establish and communicate the commitment of ETI to the health and safety of its employees and to establish the process by which ETI employees will be provided information and tools necessary to safeguard their personal safety, the safety of their coworkers.

3. Scope and Applicability

This Health and Safety Plan is applicable to all Corporate ETI Professional staff, contract staff, and temporary staff on the ETI Professional, Inc. payroll.

4. Responsibility

The Client is responsible for work site health and safety and for developing the relevant and necessary site health and safety policies, procedures and plans. The employee is responsible for reviewing the pertinent Client health and safety policies, procedures and plans prior to starting an assignment. Additionally, it is the responsibility of ETI employees to comply with the elements of the Client health and safety policies, procedures and plans as well as the ETI Health and Safety Plan.

In the event that the measures taken by a Client are not adequate or contradict the ETI Statement of Policy or this plan, the employee has the responsibility to report these concerns to ETI. It is the responsibility of ETI Corporate management to respond to and investigate employee concerns.

5. Procedure

Under the Occupational Safety and Health Administration regulations, it is the responsibility of the supervising authority (e.g., the Client) to direct and inform ETI employees of the hazards they may be exposed to in the workplace during their assignment. Communication of these hazards may take various forms depending upon the Client health and safety program structure and the specific assignment.

A general overview of many pertinent OSHA programs and requirements are provided as part of the ETI Health and Safety Plan. This information is intended to provide general education, to enhance awareness to the required OSHA programs, and to reinforce health and safety topics commonly covered by ETI Client health and safety programs. Additional direction in how these programs may impact ETI employees and their relationship to ETI management are also discussed.

5.1. Asbestos Abatement (29 CFR 1910.1001)

Asbestos is well recognized as a health hazard and is highly regulated by both OSHA and EPA. ETI does not typically provide staff support to asbestos abatement programs, however it is possible that an assignment may take employees to locations where asbestos or asbestos containing materials (ACM) are present. A program of labeling and training is required to be provided to any employee that may be exposed to asbestos while perform their duties.

5.2. Bloodborne Pathogens (29 CFR 1910.1030)

This standard addresses the possible exposure employees may have to blood or other potentially infectious materials as a result of contact with those materials. First aid/emergency response personnel are required to be trained in appropriate PPE and work practices. ETI employees should not function in a first aid/emergency response function unless they have been provided all required training.

5.3. Confined Space Entry (29 CFR 1910.146)

Many workplaces contain spaces that are considered to be "confined" because their configurations hinder the activities of any employees who must enter into, work in, and exit from them. In many instances, employees who work in confined spaces also face increased risk of exposure to serious physical injury from hazards such as entrapment, engulfment, and hazardous atmospheric conditions.

The definition of a confined space is:

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

The term "permit-required confined space" (i.e., permit space) refers to those spaces that meet the definition of a "confined space" and pose health or safety hazards, thereby requiring a permit for entry. Permit required confined space is 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 covering walls or by a floor that slopes downward and tapers to a smaller cross-section.
- Contains any other recognized serious safety or health hazard.

All "permit-required" confined space must be marked "Confined Space - Entry Permit Required". ETI employees are not to enter these areas without the proper training and oversight.

5.4. Control of Hazardous Energy (29 CFR 1910.147)

This standard helps safeguard employees from the unexpected startup of machines or equipment or release of hazardous energy while they are performing servicing or maintenance. The standard identifies the practices and procedures necessary to shut down and lock out or tag out machines and equipment, requires that employees receive training in their role in the lockout/tagout program, and mandates that periodic inspections be conducted to maintain or enhance the energy control program.

This rule requires that, in general, before service or maintenance is performed on machines or equipment, the machines or equipment must be turned off and disconnected from the energy source, and the energy-isolating device must be either locked or tagged out.

ETI employees must be aware that if equipment is locked out or tagged with an energy-isolating device they are not to operate the equipment until the lock or the individual identified on the lock or tag removes them.

5.5. Electrical Safety (29 CFR 1910.303-339)

Electrical safety awareness is necessary to prevent electrically related injuries and property damage. Electricity has long been recognized as a serious workplace hazard, exposing employees to such dangers as electric shock, electrocution, fires and explosions. Employees may only conduct adjustment, repair or replacement of electrical components or equipment when qualified through appropriate training and certification.

ETI employees are considered "**unqualified employees**" for purposes of the electrical standard. Therefore, the following general electrical safety rules apply:

- Do not conduct any repairs to electrical equipment
- Report all electrical deficiencies to your supervisor.
- Do not operate equipment if you suspect an electrical problem.

- Water and electricity do not mix.
- Even low voltages can kill or injure you.
- Do not use cords or plugs if the ground prong is missing.
- Do not overload electrical receptacles.

5.6. First Aid Response and Training (29 CFR 1910.151)

Only employees trained in proper first aid responses and appropriate personal protective equipment, devices, bloodborne pathogens, and infectious materials should render first aid. ETI encourages its employees to volunteer to become Red Cross First Aid – First Responders.

5.7. Fire Protection (29 CFR 1910.157)

If portable fire extinguishers are provided for employee use in the workplace, the employees must be familiar with the classes of fire extinguishment and understand the basics of portable fire extinguisher use.

There are four basic classes of fires. All fire extinguishers are labeled using standard symbols for the classes of fires they can put out. A red slash through any of the symbols tells you the extinguisher **cannot** be used on that class of fire. A missing symbol tells you only that the extinguisher has not been tested for a given class. The following are the extinguisher classes:

- Class A – Ordinary combustibles such as wood, paper, cloth, rubber and many plastics. The extinguishing agent is water.
- Class B – Flammable liquids such as gasoline, oil, grease, tar, oil-based paint, lacquer, and flammable gas. The extinguishing agent is dry chemicals.
- Class C – Energized electrical equipment including wiring, fuse boxes, circuit breakers, machinery, and appliances. The extinguishing agent is dry chemicals. (Never use water on these fires.)
- Class D – Combustible metals, such as magnesium, sodium, potassium, and alkali metals. The extinguishing agent is special liquid or dry powder. (Never use water on these fires, it can cause an explosion)

Portable fire extinguisher use follows the four-step PASS procedure:

1. PULL the pin on the fire extinguisher.
2. AIM low by pointing the nozzle at the base of the fire.
3. SQUEEZE the lever below the handle to discharge the extinguishing agent.
4. SWEEP from side to side at the base until the flames appear to be out.

It is the responsibility of the Client to ensure that portable fire extinguishing equipment is readily accessible, maintained in fully charged and operational, and inspected.

5.8. Hazard Communication (29 CFR 1910.120)

The purpose of the Hazard Communication Standard is to ensure that the hazards of all chemicals used in the workplace are evaluated and that information concerning their hazards are communicated. Container labeling, material safety data sheets (MSDS), and employee training are the primary elements of the communication program.

This program requires that the a written hazard communication program be developed; that copies of MSDSs for hazardous materials used on the worksite be maintained and readily available for employees; and that information on the hazards of the chemicals and the procedures in place to protect employees from exposure be communicated to the employees through an established training program.

The training program shall, at a minimum, include methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area, the physical and health hazards of the chemicals in the work area, the measures employees can take to protect themselves from these hazards, and the details of the hazard communication program.

5.9. Hazardous Waste Operations and Emergency Response (HAZWOPER- OSHA 40 Hour) (29 CFR 1910.1200)

The Hazardous Waste Operations and Emergency Response Standard (HAZWOPER), and its subsequent certified responders, addresses hazardous substances and their management in three distinct areas:

- Workers at uncontrolled hazardous waste sites (i.e., SUPERFUND sites);
- RCRA Permitted treatment, storage and disposal (TSDs) facilities; and
- Emergency Response Teams.

While there are many aspects of the HAZWOPER Standard depending upon the area of applicability, the most consist requirements include assessing the worksite for hazards, developing a safety and health program based on the potential site hazards, ensuring site control, developing a program to evaluate the impact of hazardous material exposure (medical surveillance and monitoring), work practices, decontamination, personal protective equipment (PPE) and training.

Even though specific assignments may not fall into one of the distinct designations mentioned above, many of ETI's Clients require that ETI employees assigned to their project be HAZWOPER (OSHA 40 Hour) certified. The HAZWOPER certification requires training in very specific areas dealing with PPE, general chemical information, chemical hazard and toxicology identification, work practices that minimize risk, and many of the elements of site activity that an ETI employee may come into contact with at an assignment. For this reason the HAZWOPER certification can be viewed as minimum training for workers in the environmental restoration occupational field.

5.10. Hearing Conservation (29 CFR 1910.95)

There are many working environments where occupational noise may have detrimental effects on ETI employees hearing. Excessive noise exposure requires that feasible administrative or engineering controls be utilized when employees are subjected to sound levels exceeding the required standard. If such controls fail to reduce sound levels, personal protective equipment must be worn to reduce exposures to within permissible levels.

ETI's Clients must evaluate the workplace to determine the applicability of this standard. If your workplace is designated a "high noise" or "Hearing Conservation" area, you are required to:

1. Comply with the Client Health and Safety Plan for controlling noise exposure.
2. Make proper use of the hearing devices provided.
3. Report any suspected change in noise levels to your supervisor.
4. Participate in audiometric testing or other hearing conservation programs as required by the Client Health and Safety Plan.

5.11. Heat Stress (General Duty Clause – PL 91-596)

Operations involving high air temperatures, radiant heat sources, high humidity, direct physical contact with hot objects, or strenuous physical activities have a high potential for inducing heat stress in employees engaged in such operations. OSHA does not specifically address heat stress in a regulation. However, because heat stress is known to be a serious hazard, workers are protected under the **General Duty Clause** of the Occupational Safety and Health Act. The clause states that employees must be provided "employment free from recognized hazards causing or likely to cause physical harm."

Key points to remember about heat stress, in hot environments:

- Drink plenty of decaffeinate liquids – preferably water
- Take breaks in a cool environment
- Avoid alcohol
- Wear light colored clothing
- Report any problems to your supervisor

5.12. Industrial Fork Truck (29 CFR 1910.178)

Material handling is a significant safety concern. Only trained and authorized operators are permitted to operate a powered industrial truck (e.g. forklifts etc.) and must be able to demonstrate the knowledge and ability to operate the equipment safely. This program includes the ability to successfully complete classroom and practical training in the proper vehicle operation, the hazards of operating the vehicle in the workplace, and the requirements of the OSHA standard for powered industrial trucks. Operator must be evaluated while operating the vehicle and receive periodic refresher training if there is a demonstrated need.

ETI personnel are not authorized to operate powered industrial trucks without proper training and a demonstrated ability to operate the vehicle safely. ETI employees shall not operate powered industrial trucks without authorization by ETI management.

5.13. Laboratory Operations – Occupational Exposures to Chemicals in Laboratories (29 CFR 1910.1450)

Because of the unique characteristics of the laboratory workplace, a specific standard to address occupational exposure to hazardous chemicals in the laboratory was developed. This standard, often referred to as the “Lab Standard”, requires that a laboratory develop a Chemical Hygiene Plan addressing specific hazards found in its location and how the hazards are to be managed by the laboratory. This document then serves as the regulatory framework the lab operates under. It provides necessary work practices, procedures and policies to ensure that employees are protected from potentially hazardous chemicals in use in their work area.

Laboratory employees are also required to receive training and information under the Lab Standard. They must be trained on:

- The contents of the Standard;
- The location and availability of the Chemical Hygiene Plan;
- The permissible exposure limits (PEL) for the materials in use in the Lab;
- Signs and symptoms associated with exposures to hazardous chemicals used in the Lab;
- The location and availability of reference materials on chemicals used in the Lab;
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the Lab;
- The physical and health hazards of the chemicals in the Lab; and
- Protective measure employees should use.

ETI employees may be required to use respirators as part of their work in a laboratory. The elements of the Respiratory Protection Standard (29 CFR 1910.132) would apply in that event. Additionally, the Lab Standard requires that incoming hazardous chemicals be labeled, as required by the Hazard Communication Standard (29 CFR 1910.1200) and MSDSs provided. And finally, the Lab Standard requires that in the event an employee is exposed to a hazardous chemical, medical consultation and examination must be available to assess the impact of the exposure.

5.14. Medical Surveillance (29 CFR 1910.1020)

ETI employees may be included in the Client’s Medical Surveillance Program if they are required to wear a respirator, work in a position **requiring** HAZWOPER-OSHA 40 Hour Certification, or are involved in project that must comply with OSHA Subpart Z – Toxic and Hazardous Substances requirements. Exposure and medical records must be made available to employees upon request. ETI Clients must inform ETI employees of the existence, location and explain the employees right to access these records. ETI management does not have rights to access these records.

5.15. Personal Protective Equipment (PPE) (29 CFR 1910.132)

Personal protective equipment (PPE) must be used when the Client has determined, through a process of assessing the potential workplace hazards, that there are hazards present, or are likely to be present. If so identified in the hazard assessment, the use of PPE (head, eye, respiratory, face, foot, or hand) will be necessary.

The Client is required to train each employee on the proper use of PPE including the following:

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

5.16. Respiratory Protection (29 CFR 1910.134)

A Respiratory Protection Program is required when employees have the potential to be exposed to airborne contaminants which may exceed (or potentially exceed) regulatory/government, manufacturer's exposure limits, or upon the recommendation of an industrial hygienist or safety professional. The following elements are required for a Respiratory Protection Program:

1. A Respiratory Protection Program administrator to evaluate respiratory need, respiratory selection, training, and provide oversight and management to the program.
2. Provide medical evaluations to employees wearing respiratory protection.
3. Fit testing, to include a demonstration in the proper donning, wearing, and field fit testing techniques, and a qualitative or quantitative fit test.
4. Training in the proper use, handling, maintenance and inspection of the respiratory, and the nature of the hazard to include its physical properties, possible concentrations, form of physiological action and means of detection.
5. Maintenance and inspection of the respirator.

ETI employees mandated to wear respirators in the workplace shall have a respiratory medical evaluation, a fit test, receive training and adhere to the requirements of the Client's Respiratory Protection Program.

6. Accident Reporting

Incidents/accidents that occur while performing work while an employee of ETI Professional, Inc. must be reported through the Client management structure and shall be reported to ETI as soon as possible. All work-related injuries or illnesses, no matter how minor, must immediately be reported to the employee's supervisor and ETI Professionals' Human Resources Department. Failure to immediately report work-related injuries may jeopardize your rights to secure Worker's Compensation Benefits.

ETI reserves the right to request that employee submit to a drug screen after an incident.