

LAVENDER, INC.

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Lavender, Inc.

SAFETY PROGRAM

SAFETY IS OUR MAIN CONCERN

Safety of all our employees is an important concern of those who manage our Company. We believe that our employees are our most valuable asset and that your safety is everyone's responsibility.

We expect the Supervisors and Foreman to recognize and accept their responsibility for accident prevention.

Safety requires a constant effort on the employee's part as well as the Supervisor's part.

PERFORMANCE EVALUATION IS BASED ON:

- Ability of safely performed assigned duties.
- Knowledge of the skills of your trade.
- The quality of work performed.
- Attitude shown towards fellow employees, Supervisors, and the Company.
- Accuracy and dependability of work.
- Ability to understand instruction, solve problems, and cope with changing conditions

LAVENDER, INC.

RULES & GUIDELINES

Lavender, Inc.

COMPANY RULES AND GUIDELINES

The orderly and efficient operation of the Company requires that employees maintain discipline and proper standards of conduct. Discipline and proper conduct are necessary to protect the health and safety of all employees, to maintain uninterrupted production and jobs, and to protect the Company's goodwill and property.

To that end, the company has established plant rules. An employee who fails to maintain proper standards of conduct or who violates any of the rules shall be subject to disciplinary action up to and including discharge.

The plant rules are as follows:

ALL EMPLOYEES ARE TO READ THIS BOOKLET AND BE FAMILIAR WITH ALL RULES AND REGULATIONS. EACH EMPLOYEE IS TO SIGN THE COMPANY RULES AND GUIDELINES AND RETURN A COPY TO THE PERSONNEL DIRECTORY.

1. All personnel are required to wear approved safety glasses and steel-toed boots. Ear plugs and hardhats are required at all posted areas.
2. Employees must be at their appropriate work place, ready to work at their scheduled time, and shall remain at their work place until scheduled quitting time except for scheduled breaks.
3. The possession, use, or display of fire arms or other weapons will not be permitted on Company or customer premises.
4. Employees are held responsible for the accuracy of their reporting of all accidents to their immediate supervisor.

5. Employees are expected to keep their work area clean and orderly
6. The removal of Company property, records, materials, or tools without proper written authorization is prohibited.
7. Fighting on Company property is prohibited.
8. Engaging in horseplay or other disorderly conduct on Company property is prohibited.
9. Reporting to work under the influence of alcoholic beverages is prohibited.
10. Reporting to work under the influence of, or in possession of controlled substances in violation of local or federal laws is prohibited.
11. The willful abuse of Company property is prohibited
12. The prevention of waste in excess is the responsibility of the employee
13. The prevention of defective work as a result of carelessness is the employee's responsibility.
14. All absences or lateness for work must be authorized by the employee's Supervisor.
15. Failure to follow the Supervisor's instruction is prohibited.
16. Sexual harassment of any employee is prohibited.
17. It is the employee's responsibility to report to work in a fit mental and physical state and remain so during his working hours.
18. It is the responsibility of every employee who uses Company vehicle or machinery to perform a routine maintenance check.
19. It is the employee's responsibility to observe and obey all safety rules and practices for the Company.

Lavender, Inc.

GENERAL SAFETY RULES AND GUIDELINES

These important rules are established to prevent accidents that can cause personal injuries.

These rules cover specific actions by the employee and must be followed. Unless an emergency exists, these rules are not subject to personal judgment by the individual.

1. Horseplay is not allowed
2. Fighting is forbidden
3. Possession of alcohol or drugs on Company or customer premises is prohibited.
4. Reporting to work under the influence of intoxicants or drugs is prohibited.
5. Driving a company vehicle under the influence of intoxicants or drugs is prohibited.
6. When driving a company vehicle, all traffic laws must be obeyed.
7. Never run, except in extreme emergencies.
8. Never operate machinery or equipment unless all safeguards are in place.
9. Never operate machinery unless authorized to do so.
10. Never adjust, clean, or repair machinery or equipment that is running.
11. All machinery that is shut down for maintenance repair must be locked out.
12. Locked out machinery must not be started without supervisor's authorization.

13. Report all hazardous conditions or emergencies to the immediate supervisor.
14. Do not remove, destroy, or damage any safety equipment.
15. Do not use air hoses for cleaning clothing or another person.
16. Never attempt to stop a machine by hand.
17. Do not operate a lift truck without having a clear view at all times.
18. Do not obstruct doorways, stairs, fire extinguishers, or fire exits.
19. Do not use makeshift or defective equipment.
20. Wear any personal protective clothing needed to perform the job safely, i.e. safety glasses, hard hat, face shields, safety belts, etc.
21. All compressed gas cylinders are to be stored in an upright position and a valve protection cap must be in place.
22. All employees are to attend the weekly safety meetings.
23. A safety meeting is to be held at each jobsite before work begins.
24. Before the use of any machinery or equipment at the beginning of a shift, a routine inspection must be performed.
25. Before operating a crane, an inspection must be performed.

**LAVENDER INC,
FIRST AID**

Lavender, Inc.

FIRST AID

First aid care, treatment, supplies and facilities are provided by Lavender, Inc. First aid boxes are located in the shop.

Transportation to a doctor or hospital, if needed, will be provided by Lavender, Inc.

Accidents of any nature are to be reported to the immediate supervisor.

Accident reports must be completed within three (3) days of the injury.

Key employees (supervisor, foreman, standby person) are to be trained on how to respond to injuries and emergencies properly.

LAVENDER INC.
CONFINED SPACE ENTRY PROCEDURES

Lavender, Inc.

CONFINED SPACE ENTRY PROCEDURES

SCOPE: The confined space entry procedures provide guidelines that should be observed when entering a confined space such as a tank or vessel.

1. The tank should be clear of any hazardous material.
2. All piping entering the tank should be blanked off and the valves should be locked out and tagged in the closed position in order to prevent the accidental opening.
3. All machinery should be locked and tagged in the off position in order to prevent the accidental dumping of material into the tank.
4. Before entry, the tank must be tested for oxygen level, toxic, explosive and flammable gases and vapors.
5. Protective clothing must be worn when required.
6. A standby person is to remain outside the tank at all times. At no time should the standby person leave the area. If the standby person has to leave, then the persons inside the tank must exit the tank.
7. Persons entering the tank must wear safety harness for rescue purposes.
8. The standby person will secure help for emergency rescue.
9. The standby person should never attempt to enter the tank and attempt a rescue alone.
10. Any person entering the tank for rescue purposes should wear a self-contained breathing unit.
11. Upon completion of the job, the supervisor should be informed and he is to remove all locks, tags, blanks.

LAVENDER, INC.

WELDING OPERATION AND FIRE PROTECTION

Lavender, Inc.

WELDING OPERATIONS & FIRE PROTECTION

SCOPE: Protection of all electronics, electrical devices, and equipment during welding operations.

The ground leads must be attached to the item being welded.

All equipment shall be protected from damage while welding.

A fire watch is required during welding operations and to remain so for 30 minutes after all welding procedures are complete.

The fire watch personnel will have a fire extinguisher with him at all times.

All cable trays must be protected from welding slag and splatter.

Fire blankets are to be used to prevent welding slag and splatter from dripping through grating to lower areas.

All welding procedures at mill sites must be followed (i.e welding permits).

Welding machine must be grounded as required.

LAVENDER, INC.

LOCKOUT-TAGOUT PROCEDURES

Lavender, Inc.

LOCKOUT-TAGOUT PROCEDURES

SCOPE: To prevent any accidental starting of pumps, motors, and such while working on/in the equipment.

No work is to be performed on any equipment that has not been locked out properly.

The supervisor must be notified when work is ready to begin.

The supervisor and the job foreman will isolate the equipment.

If associated equipment can cause any danger, then it must also be locked out.

Tags with the lockout person's name will be placed on the lock.

Only the person whose name appears on the tag can remove the lock.

The job foreman will notify the supervisor when the job is complete. Then the locks will be removed by the named persons.

LAVENDER INC.
DRUG AWARENESS PROGRAM

Lavender, Inc.

DRUG AWARENESS PROGRAM

SCOPE: To provide a safe, productive and drug-free work environment for all employees. Persons not following the rules and guidelines below will be terminated and/or prosecuted.

1. The sale, purchase or possession of drugs is prohibited on company property or while on customer property.
2. The use of any illegal drugs will not be permitted.
3. Drug testing will be used as pre-employment qualification and will be done randomly as Lavender, Inc. feels necessary.

Lavender, Inc.

SAFE WORK POLICY

Safety is a core value at Lavender, Inc. Every employee must comply with all policies and work rules. Compliance will assure a safe and healthy work environment.

PERSONAL PROTECTIVE EQUIPMENT

Personal Protective Equipment shall be worn by all employees at all times to protect them from personal injury. Job description and work requirements will determine when, where and what specific equipment is to be used.

GENERAL REQUIREMENTS

PERSONAL PROTECTIVE EQUIPMENT

The employer shall assure that personal protective equipment, including any equipment provided by an employee, is maintained in a serviceable condition.

NOTE: "Serviceable Condition" is defined as "a state or ability of a tool, machine, vehicle or other device to operate as it was intended by the manufacturer to operate".

The employee shall assure that personal protective equipment, including any personal protective equipment provided by an employee. Is inspected before initial use and then at the start of each work shift. Defects or damage shall be repaired or the unserviceable personal protective equipment shall be replaced before work resumes.

The employer shall provide, at no cost to the employee, and assure that each employee handling wire rope wears hand protection. Cut resistant gloves are required when using a utility knife or handling sharp objects.

The employer shall assure that each employee shall wear foot protection, such as steel-toed heavy duty work boots that cover and provide support to the ankle.

The employer shall provide, at no cost to the employee, and assure that each employee who works on the jobsite wears head protection meeting the requirements of Subpart 1 of 28 CFR part 1910.

The employer shall provide, at no cost to the employee, and assure that each employee who works on the jobsite where there is potential injury from fall ing or flying objects wears eye and face protection meeting the requirements of Subpart 1 of 29 CFR Part 1910.

OSHA Standard 29 CFR 1910.95 Occupational Noise Exposure requires noise level monitoring, audiometric testing of employees, and that employees have a choice of hearing protection- muffs or plugs- if exposure is higher than 85 decibels.

This section lists personal protection equipment required for employees doing a certain job.

Job Category:

1. Supervisor/Foreman: Hard hat, Safety Boots, Safety Glasses, and Hearing protection.

Any time a supervisor, foreman or other employee is working in any job category they shall wear all personal protective equipment required for their job category.

1. Welder:

- Hard Hat and/or Welding Hood
- Hearing Protection
- Safety Boots
- Safety Glasses
- Gloves
- Protective Clothing
- Cutting Goggles (when using a torch)
- Face Protection (when required)

2. Fitter:

- Hard Hat
- Hearing Protection
- Safety Boots
- Face Protection (when required)
- Cutting Goggles (when using a torch)
- Gloves
- Safety Glasses

3. BoilerMaker/Millwright:

- Hard Hat
- Face Protection (when required)
- Safety Glasses
- Hand Protection

- Ear Protection
- Safety Boots

4. Laborer:

- Hard Hat
- Safety Boots
- Hearing Protection
- Face Protection (when required)
- Safety Glasses

5. Crane Operator:

- Hard Hat (if not totally in totally enclosed cab)
- Safety Boots
- Hearing Protection (if not in totally enclosed cab)
- Safety Glasses
- Gloves (when required)

6. Truck Driver:

- Hard Hat (when not in cab)
- Safety Boots
- Gloves (when applicable)
- Safety Glasses
- Ear Protection (when applicable)

NOTE: Hard Hats, although recommended, will not be required while seated, with the seat belt fastened, in the cab of a machine equipped with a Falling Object Protective Structure (FOPS)

NOTE: Safety glasses, although recommended, will not be required while seated in the cab of a machine if the cab is FULLY ENCLOSED and while all doors and windows are shut and secure.

NOTE: Hearing Protection, although recommended, will not be required while seated in the cab of a machine if the cab is FULLY ENCLOSED, all doors and windows are shut, and it can be shown that sound pressure levels inside do not exceed an 85dB TWA (Total Weighted Average) while the machine is at maximum RPM with attachments operating.

NOTE: Personal Protective Equipment other than foot protection – boots – must be provided by the employer at no cost to the employee. This requirement has not existed in the past.

MACHINES

OSHA defines a “machine” as a piece of stationary or mobile equipment having a self-contained power plant that is operated off-road and used for the movement of material. Machines include but are not limited to tractors, cranes, front-end loaders, forklifts and excavators.

GENERAL REQUIREMENTS

- The employer shall assure that each machine, including any machine provided by an employee, is maintained in serviceable condition.
- The employer shall assure that each machine, including any machine provided by an employee, is inspected before initial use and before each work shift. Defects or damage shall be repaired or the unserviceable machine shall be replaced before work is commenced.
- The employer shall assure that operating and maintenance instructions are available on the machine or in the area where the machine is being operated. Each machine operator and maintenance employee shall comply with the operating and maintenance instructions.

MACHINE OPERATION

- The machine shall be started and operated only by a designated person
- **NOTE:** A “Designated Person” is an employee who has the requisite knowledge, training and experience to perform specific tasks.
- The rated capacity of any machine shall not be exceeded.
- The machine shall not be operated on any slope which is greater than the maximum slope recommended by the manufacturer.
- Before starting or moving any machine, the operator shall determine that no employee is in the path of the machine.
- The equipment operator shall not operate movable elements (booms, buckets, etc.) close to or over personnel.

- The machine shall be operated only from the operator's station or as otherwise recommended by the manufacturer.
- The machine shall be operated at such a distance from employees and other machines such that operation will not create a hazard for an employee.
- No employee other than the operator shall ride on any mobile machine unless seating, seat belts and other protection equivalent to that provided for the operator are provided and used when the machine is traveling.
- No employee shall ride on any load.
- Before the machine operator dismounts, the machine brake lock or parking brakes shall be applied. Each moving element, such as but not limited to blades, buckets and booms shall be grounded.
- After the machine engine is shut down, pressure or stored energy from hydraulic or pneumatic storage devices shall be discharged.
- The rated capacity of any vehicle transporting a machine shall not be exceeded
- The machine shall be loaded, secured and unloaded so that it will not create a hazard for any employee. Note: This requirement covers the loading and unloading of a machine on and off a transport vehicle.
- Equipment controls shall be checked to assure proper function and response before work is started.
- Stability limitation of equipment shall not be exceeded.
- Walking and working surfaces shall be kept free of any material which might contribute to slipping and falling.
- No flammable waste or debris may be kept on walking or working surfaces.
- Steel decks of machines and other machine work stations shall have safety tread or other slip-resistant material.
- A seat belt will be provided for each vehicle or machine operator.
- Each employee will use the available seat belt while the vehicle or machine is being operated.

- Each employee will securely and tightly fasten the seat belt to restrain the employee within the vehicle or machine cab.

Each machine seat belt will meet the requirements of the Society of Automotive Engineers Standard SAE J386, June 1985, **Note:** Seat belts on ‘machines’-tractors, front-end loaders, forklifts, cranes, and excavators should have tags of identification listing SAE J386, June 1985, or in the case of older machines SAE J386-1969

- Seat belts will not be removed from any vehicle or machine. The employer shall replace or cause to be replaced each seat belt which has been removed from any vehicle or machine that was equipped with seat belts at the time of manufacture.
- “Operator Restraint Systems for Off-road Work Machines”.

MACHINE MAINTENANCE

The construction contractor shall develop and implement Lock/Out Procedures appropriate to their construction operation and equipment.

- Each machine, vehicle and portable powered tool shall be shut off during fueling.
- Equipment engines shall be shut down and the park brake set during servicing and repairs except where operation is necessary for adjustment.
- Each tractor, loader, forklift or other similar machine placed into initial service after February 9, 1995, shall be equipped with falling object protective structure (FOPS) and/or rollover protective structure (ROPS). The employer shall replace or cause to be replaced
- FOPS or ROPS which have been removed from any machine. **Note:** This requirement does not apply to machines which are capable of 360 degree rotation.
- ROPS shall be installed, tested, and maintained in accordance with the Society of Automotive Engineers SAE J1040, April 1988, “Performance Criteria for Rollover Protective Structures (ROPS) for Construction, Earthmoving, Forestry, and Mining Machines. **Note:**

SAE J1040, April 1988, or prior applicable standard in the case of machines made before 1988, should be listed on the machine ROPS certification plate.

- FOPS shall be installed , tested and maintained in accordance with the Society of Automotive Engineers SAE J231, January, 1981, “Minimum Performance Criteria for Falling Object Protective Structures (FOPS)”. **Note:** SAE J231 should be listed on the certification plate.
- ROPS and FOPS shall meet the requirements of the Society of Automotive Engineers SAE J397, April, 1988, “Deflection Limiting Volume-ROPS/FOPS Laboratory Evaluation”. **Note:** SAE J397 should be listed on the certification plate.

Note: The machine owner must rely on the FOPS/ROPS certification plate placed on the machine by the manufacturer.

- Guards shall be provided for exposed moving elements such as shafts, pulleys, belts, conveyors and gears. The guards must comply with 29CFR 1910.266 (d)(3)
- Mufflers provided by the manufacturer or their equivalent shall be in place whenever the machine is in operation.
- Stability, boom reliability, and inspection procedures shall comply with 29 CFR 1910.266 (d)(6)
- The operator shall determine that no personnel are endangered before starting or moving equipment. The equipment operator shall walk completely around the machine and assure that no obstacles or personnel are in the danger area before startup.
- Equipment operators shall maintain a safe working distance from each other and personnel so as not to create a hazard to employee safety.
- Elevated equipment components (e.g. blades, booms, etc.) shall not be moved or held over personnel, or close to personnel.
- Elevated loads shall not be moved or held over personnel, or close to personnel

- Riders or observers shall not be permitted on loads at any time
- Riders or observers are not permitted on machines unless seating and protection are provided; such protection must be equivalent to that provided to the operator.
- There will be no gasoline or diesel fuel containers carried inside or attached to a tractor, forklift, or similar machine that is not installed by the manufacturer of standard equipment
- While signal men are being used, the equipment operator shall operate the equipment only on signal from the designated signal man, and then only when the signal is distinct and clearly understood.
- Equipment shall not be operated so as to place undue shock loads on wire rope.
- When equipment is operated in the vicinity of electrical distribution lines, there shall be at least 10 feet (3m) of clearance between the lines and any part of the equipment or load. If the electrical transmission lines are rated 50kv or more, or if the rating is unknown, special precautions are necessary and the operator shall stop work and notify the foreman.
- Equipment transported from one job location to another shall be transported on a vehicle of sufficient rated capacity, and shall be secured in such a manner as not to endanger personnel.
- Load limits shall not exceed the stated capacity of pallets and trailers.
- Towed equipment such as skid pans, pallets, arched and trailers shall be attached to the vehicle in a manner which will allow a full 90-degree turn; prevent overturning of the towing vehicle, and assure the operator is always in control of the towed equipment. The load should not contact the rear tire or the rear track assembly.
- The vehicle and load shall be operated with safe clearance from all obstruction. An approved, charged fire extinguisher shall be kept on each vehicle and machine.
- An approved first aid kit shall be kept on each job-site.

VEHICLES

A “Vehicle” is defined by OSHA as a car, bus, truck, trailer, or semitrailer that is used for transportation of employees or movement of material.

- The employer shall assure that each vehicle used to transport any employee off public roads or to perform any construction operation is maintained in serviceable condition.
- The employer shall assure each vehicle used to transport any employee off public roads or to perform any construction operation is inspected before initial use and during each work shift. Defects or damage shall be repaired or the unserviceable vehicle shall be replaced before work is commenced.
- The employer shall assure that the operating and maintenance instructions are available in each vehicle. Each vehicle operator and maintenance employee shall comply with operating and maintenance instructions.
- The employer shall assure that each vehicle operator has a valid operator’s license for the class of vehicle being operated.
- Mounting steps and handholds shall be provided for each vehicle wherever it is necessary to prevent any employee from being injured when entering or leaving the vehicle.
- The seats of each vehicle shall be securely fastened

Note: The provisions in these rules which apply to machines also apply to vehicles to transport any employee off public roads or to perform any construction operation, including any vehicle provided by an employee.

- The rated capacity of any vehicle shall not be exceeded.
- Before starting or moving any vehicle, the operator shall determine that no employee is in the path of any vehicle.
- The vehicle shall be operated at such a distance from employees and other machines (and vehicles) such that operation will not create a hazard for an employee.

- Before any vehicle is left unattended, the vehicle brake locks or parking brakes shall be applied. Each moving element, such as but not limited to blades, buckets and forks, shall be grounded.
- The vehicle shall be loaded, secured and unloaded so that it will not create a hazard for any employee.
- Each vehicle shall be equipped with a park brake braking system which shall be effective in maintaining parking performance, regardless of the direction of travel or whether the engine is running.

FLAMMABLE AND COMBUSTIBLE LIQUIDS

- Flammable and combustible liquids shall be stored, handled, transported, and used in accordance with the requirements of Subpart H of 29 CFR Part 1910.

Note: Subpart H details size and specification of fuel containers ranging from those used to carry chain saw fuel to portable tanks or diesel fuel for construction equipment. These requirements are the same that have been in force for many years.

- Flammable and combustible liquids shall not be transported in the driver compartment or in any passenger-occupied area of a machine or vehicle.

HAND TOOLS

- The employer shall assure that each hand portable power tool, including any tool provided by an employee, is maintained in serviceable condition.
- The employer shall assure that each tool, including any tool provide by an employee, is inspected before initial use during each work shift. At a minimum, the inspection shall include the following:
 - Handles and guards, to assure that they are sound, tight fitting, properly shaped, free of splinters and sharp edges, and in place.

- Controls – to assure proper function.
 - Chain-saw chains – to assure proper adjustment.
 - Chain-saw mufflers – to assure that they are operational and in place.
 - Chain brakes and nose shielding devices – to assure that they are in place and function properly.
 - Heads of shock, impact and driving tools – to assure that there is no mushrooming.
 - Cutting edges – to assure that they are sharp and properly shaped.
 - All other safety devices – to assure that they are in place and functioning properly.
- The employer shall assure that each is used only for purposes for which it has been designed.
 - When the head of any shock, impact-driven or driving tool begins to chip, it shall be repaired or removed from service.
 - The cutting edge of each tool shall be sharpened in accordance with manufacturer’s specifications whenever it becomes dull during the work shift.
 - Racks, boxes, holsters, or other means shall be provided, arranged and used for the transportation of tools so that a hazard is not created for any vehicle operator or passenger.
 - Hand tools shall be sheathed or boxed if transported in a vehicle with personnel. If not contained in a box, the sheathed tools shall be fastened to the vehicle.
 - Proper storage facilities shall be provided for hand tools. Tools shall be stored in the provided location at all times when not in use.
 - Periodic inspections shall be made to assure all tools are serviceable and others removed from use.
 - Explosive and blasting agents shall be stored, handled, transported, and used in accordance with the requirements of Subpart H of 29 CFR Part 1910.

- Only a designated person shall handle or use explosives and blasting agents.
- Explosives and blasting agents shall not be transported in the driver compartment or in any passenger-occupied area of a machine or vehicle.

CONSTRUCTION HEAVY EQUIPMENT

- The equipment operator shall maintain a safe distance from other equipment or personnel when digging, pushing, hoisting, loading or otherwise operating so as not to create a hazard to employee safety.
- The equipment operator shall apply all brakes and locks and lower implements before dismounting.
- When the equipment operator is shutting off the machine before dismounting, the equipment operator shall apply brakes and locks and lower the attachments and implements.
- Buckets and forks should be raised a minimum of 8" high when traveling.
- The equipment operator shall discharge all pneumatic, hydraulic, or other pressurized systems before dismounting.
- Only designated, trained operators shall operate machines.
- Equipment shall be positioned during winching so that the winch line is as near in alignment as possible with the long axis of the machine, unless the machine is designed to be used under other conditions of alignment.
- The equipment operator shall keep an approved fire extinguisher on board at all times. It shall be kept clean, secure and active at all times.
- Absolutely no riders shall be allowed on equipment, unless so designed, and safety features must be at least comparable with those for the operator.

- Keep hands, feet and clothing at a safe distance from moving parts. Do not work around moving parts with loose fitting clothing. All manufacturers' guards shall remain in place.
- All moving parts which are required to be guarded by OSHA Regulations shall be guarded.
- To alleviate slips and falls, the operator shall keep steps and all walking and work surfaces free from oil, mud, grease, snow, ice or other debris.
- Equipment operators shall operate the equipment only from the operator's station.
- Equipment may be operated only by employees whose duties call for it, or who are otherwise specifically authorized by their supervisor to do so.
- All work rules set forth entitled "Machines" shall be followed during equipment operations.
- Booms or arms shall never traverse over people or other equipment.
- All controls shall be checked at the start of each day to be sure of proper operation.
- Never move the machine in any direction you cannot clearly see. Assure yourself that all personnel are clear of the area.
- Maintenance or repair of equipment shall be performed in accordance with the lock out/tag out procedures established by the company.

ADDITIONAL GENERAL SAFETY RULES

- All employees must observe speed limits, paying attention to changes in weather and road conditions. They must adjust speeds to accommodate changes in these conditions.
- Employees assigned new or unfamiliar tasks shall undertake these new assignments only under the close supervision of a person who is experienced with the safe performance of the task. This supervision shall continue until it is determined that the employee is able to work

in a safe manner. If an employee is uncertain of any aspect of a task, they shall ask for help from the supervisor or other qualified personnel.

- Employees shall not smoke in the following situations:
 - In areas posted with no smoking signs;
 - While fueling machinery or chain saws;
 - While around any flammable liquids or compressed gases;
 - While boosting or charging batteries;
 - While using starting fluids or combustible aerosol containers.
- Jewelry such as rings, necklaces or earrings, may heighten the risk of injury, these items shall not be worn by employees on any job site.
- When employees are approaching the “DANGER BARRICADE” of a crane or boom truck, the following rules should be observed when attempting to pass through the work area:
 - Stop a safe distance away, and outside the strike area of the working machinery
 - Be sure the machine operator is aware of your presence before attempting to pass through; and
 - Be sure the machine operator has given a clear signal to pass before doing so.
- Consumption of alcohol or controlled substances are strictly prohibited at any time at any job site or while operating company vehicles or equipment. No employee under the influence of alcohol or other non-prescription drugs shall be allowed on the job. Any employee using prescription or non-prescription drugs which are assigned warnings against the operation of heavy equipment, or performing other hazardous tasks, shall not be allowed to work except in accordance with the warnings. Employees taking these kinds of medication shall report this to their foreman or immediate supervisor.
- Only company employees and authorized personnel are allowed at work sites.

- All employees are required to conform to company policies, safety standards and work rules.
- All employees shall be subject to disciplinary action by the company for failure to comply with company policies, safety standards and work rules.
- Approved, portable fire extinguishers shall be provided at locations where machines and vehicles are operated and/or on each vehicle.
- Fuel shall be stored and dispensed in accordance with 29 CFR Part 1910, Subpart H.

Lavender, Inc.

SAFETY POLICY RECEIPT

I have received and read a copy of Lavender, Inc., Safety Policy and I understand and will abide by the policy.

Signature

Date

LAVENDER, INC.

SAFETY AND HEALTH PROGRAM

SAFETY AWARENESS: At Lavender, Inc., safety is a top priority. As a construction contractor (hereinafter variously referred to in either the first person or the “contractor” or the owner/operator or employer), we believe a safety and health program will effectively eliminate or control work related hazards faced by ourselves and company employees. The success of this safety program hinges on clearly stated work rules, regularly scheduled and informative safety and training meetings, a thorough self-auditing program, and the assistance and cooperation of all employees. All employees must follow the standards and company safety policy. A progressive disciplinary policy will be enforced as part of this program.

RESPONSIBILITY FOR SAFETY: Everyone working in a construction operation is responsible for safety. Everyone must take the obligation seriously. Unsafe work practices, acts or conditions will not be tolerated. Safety is never to be compromised to production or product.

- In order for a construction contractor to provide safe and healthful employment, everyone must:
 - comply with all federal, state and local laws and regulations;
 - use good judgment and safe practices on all jobs; and
 - comply with the company Safety and Health Program and Safety Policy.
- As a construction contractor, we are specifically responsible for:
 - fostering a work environment where safety and health are paramount;
 - ensuring that employees are afforded the training necessary to maintain a safe and healthful work site;
 - implementation of the company’s Safety and Health Program;

- monitoring and requiring compliance with the company Safety and Health Program, Safety Policy and OSHA standards;
- providing necessary personal protective equipment;
- ensuring that supplies and equipment purchased by the company comply with safety standards;
- ensuring that equipment provided by employees complies with OSHA safety standards and company Safety Policy; and
- maintaining records of employee training as required by OSHA.

A construction contractor and supervisors are specifically responsible for:

- monitoring and requiring compliance with company Safety and Health Program, work rules and OSHA standards.
- ensuring that proper safety equipment is available and used appropriately.
- conducting job-site inspections, safety meetings, training and supervision, as needed, during work hours.
- correcting hazards and unsafe practices.
- obtaining medical attention for injured employees as quickly as possible and initiating First Responder intervention and Emergency Evacuation Procedures, as appropriate.

Employees are specifically responsible for:

- complying with all safety and health standards and regulations;
- complying with all company work rules;
- actively participating in safety and health training;
- requesting assistance and supervision as needed;
- using and maintaining all equipment in accordance with OSHA safety standards, company safety standards and company work rules;
- using and maintaining personal protective equipment;
- reporting all observed unsafe acts, practices or conditions; and

- correcting unsafe acts, practices or conditions within their immediate work area.

DESIGNATED SAFETY COORDINATOR: The company employs a designated safety coordinator who is available full-time and whose responsibilities include, but are not limited to, developing, implementing and enforcing the company's Safety and Health Program, employee training, recordkeeping, job-site safety inspections, conducting safety meetings, accident investigation, job hazard analysis, and research and implementation of any revisions to current environmental, health, or safety regulations.

Safety and Health Consultants and Insurance Safety Advisor: The Company may retain the services of a safety and health consultant and/or insurance safety advisor. The individuals may visit the company workplace, during which time they may conduct on-site inspections of construction operations, conduct a safety meeting and be available for consultation with employees. These individuals may also meet with management, safety coordinator, foreman and supervisors to review workplace safety and health issues, including all written reports.

Written reports made by the designated safety coordinator, consultants or advisors will be maintained in the company files.

ORIENTATION: The Company shall neither request nor permit an employee to begin work, or to begin a new task within the company, until the employee has been oriented to the job or has demonstrated the skill and work techniques necessary to do the job safely.

Each employee shall receive a personal copy of the Safety and Health Program and a personal copy of the Safety Policy. The copies will be in English. Each employee shall be required to read each of these documents, and those employees who cannot read shall have the documents read to them. Each employee shall also receive detailed verbal explanation of the company Safety and Health Program, all safety standards and work rules before commencing work.

All employees will have the opportunity to ask questions and receive:

- a detailed description of the job tasks assigned and the proper techniques for performing them;
- detailed instruction on the proper use and maintenance of personal protective equipment;
- training for identification of hazards and corresponding safety standards and work rules; and
- on-site inspection to ensure technical competence and safety awareness. The determination of competence and awareness shall be made by the foreman and safety director in consultation.

TRAINING: The employer shall provide training for each employee, including supervisors, at no cost to the employee. Training shall be provided as follows:

- as soon as possible for initial training for each current and new employee;
- prior to initial assignment for each new employee;
- whenever the employee is assigned new work tasks, tools, equipment, machines or vehicles; and
- whenever an employee demonstrates unsafe job performance.

At a minimum, training shall consist of the following elements;

- safe performance of assigned work tasks;
- safe use, operation and maintenance of tools, machines and vehicles which the employee uses or operates, including emphasis on understanding and following the manufacturer's operating and maintenance instructions, warnings and precautions;
- recognition of safety and health hazards associated with the employee's specific work tasks, including the use of measures and work practices to prevent or control those hazards;
- recognition, prevention and control of other safety and health hazards in the construction industry; and
- procedures, practices and requirements of the employer's work site.

- The employer shall train each current and new employee in those elements for which the employee has not received training.
- The employer is responsible for ensuring that each current and new employee can properly and safely perform the work tasks and operate the tools, equipment, machines and vehicles used in their job.
- The company shall train and certify employees before they are allowed to operate cranes, booms trucks, loaders, forklifts etc.
- The company shall provide training to employees at the time of their initial hire and at least annually thereafter. Training will also be provided whenever a change in job assignment will expose the employee to new hazards. This training shall occur before the employee starts the work for which the training is required.
- At a minimum, employees shall be trained to recognize safety hazards associated with their individual work tasks, and the preventive and protective measures to deal with such hazards. The training provided by the company shall also give employees the information necessary to recognize and control safety hazards in the construction industry generally. Employees shall demonstrate the ability to perform the tasks of their job.
- All new and inexperienced employees and current employees unfamiliar with a new assignment shall be under the close guidance of the foreman or supervisor until it is determined by the foreman or supervisor that those employees are able to work in a safe manner.
- Training shall be obtained through the company's designated safety coordinator, a safety consultant, insurance safety person or any other equally qualified person. Training shall be provided in all areas of the Safety and health Program and Safety Policy including, but not limited to:
 - Hazard Communication Program
 - First Aid and CPR
 - Hand and Portable Power Tool Safety
 - Chain Saw Safety and Operation
 - Heavy Equipment Safety and Operation
 - Bloodborne Pathogens
 - Personal Protective Equipment
 - Fire Extinguishers

- DOT Compliance
- Environmental Awareness
- Lock Out / Tag Out
- Emergency Response

SAFETY MEETINGS: A safety meeting will be held every Monday morning at the beginning of the work shift. All employees must attend safety meetings.

- Safety meetings will be between five and fifteen minutes in duration, or longer if necessary to cover the subject matter of the meeting, and shall be conducted by the safety coordinator, foreman or other qualified individual who, because of particular expertise, is qualified to teach the subject matter of the meeting.
- All accidents and significant near misses shall be discussed at the safety meetings. Written materials may be provided to employees as an aid to understanding the subject covered in the meeting.
- Employees are expected and encouraged to actively participate during safety meetings. Employees are also encouraged to identify topics to be covered in safety meetings. All employees present at the work site shall attend the safety meeting, and failure to do so shall be deemed a violation of company safety standards and will result in that employee being disciplined under the disciplinary program described herein.

SAFETY STANDARD AND WORK RULE ENFORCEMENT

Compliance with safety standards, the Safety and Health Program and work rules is a condition of employment. An employee who fails to comply with safety standards or work rules shall be disciplined as follows:

A point system is set up to track each employee's safety record and points will be accumulated for a two year period. If at anytime during a two year period, an employee reaches or goes beyond the maximum allowed point total (10 pts.), that employee is subject to termination. The Point System will be implemented as described below:

- Dress code violations – 1 point (examples: finger ring, ear ring, loose/baggy clothing, etc.)
- PPE violations – 2 points (examples: safety glasses, ear protection, cutting goggles, face shields, etc.)
- First aid – 3 points (example: cleansing burns and scrapes, washing debris from eyes, icing mashed fingers, etc.)
- Near miss – 4 points (example: not wearing a dominator suit when line breaking, unsecured compressed gas bottles, failure to barricade work areas, not locking out, not tying off when hips above six feet, etc.)
- OSHA recordable – 5 points (example: doctor visit with prescription or sutures, Emergency room visit with prescription or pain medication administered, fractures, etc.)

First Violation: Verbal warning to the employee, along with instruction explaining the violation. A record of verbal warning will be made and signed by the individual who gave the warning and will be retained in the employee's file.

Second Violation: Written warning to the employee explaining the violation. The employee's supervisor, safety coordinator and Lamont and Lawrence Lavender shall counsel the employee in an effort to avoid a reoccurrence of the same or a similar violation. A record of the written warning will be made and signed by the individual who gave the warning and employee to whom the warning was given and will be retained in the employee's file.

Third Violation: Suspension for one (1) day. A counseling meeting will be held with the employee, employee's supervisor, safety coordinator and Lamont and Lawrence Lavender. The employee shall submit a written statement demonstrating understanding of the safety standard or work rule violated, as well as what the

employee intends to do in the future to ensure compliance. The written statement must be provided to the company before the employee will be allowed to commence work again. A record of the written warning will be made and signed by the individual who gave the warning and the employee to whom the warning was given and will be retained in the employee's file along with the employee's written statement demonstrating understanding of the safety standard or work rule violated.

Fourth Violation: Suspension for one (1) week or may be asked not to return. In case of termination, a record of the termination will be made and signed by the individual who performed the termination and, if possible, the employee to whom the termination was given and will be retained in the terminated employee's file.

- Flagrant, egregious or intentional violations of a safety standard or work rule may result in immediate termination.
- The progressive disciplinary policy established by the Safety and Health Program does not alter or limit the company's right to terminate the employment relationship at any time for any reason. All employees are employees at will.

NOTE: It is neither the goal nor the practice of Lavender, Inc. to focus only on the negative aspect of safety, but to encourage all employees to work toward a safe and injury free environment. Therefore, Lavender, Inc. will reward those employees that participate in achieving an injury free work place. Such a reward program shall be established by company management and the safety coordinator.

REPORTING UNSAFE ACTS, CONDITIONS AND SIGNIFICANT NEAR MISSES

- All observed unsafe acts, conditions and near misses must be reported to the foreman, supervisor, safety coordinator or company management. Failure to report such incidents or conditions results in the loss of valuable information that could prevent a serious accident or property damage in the future.

- Investigations shall be conducted in accordance with the provisions of this Safety and Health Program.

INVESTIGATION OF ACCIDENTS AND NEAR MISSES

- An accident is an undesired event that results in injury or property damage.
- All accidents and near misses must be reported immediately to the foreman, supervisor, safety coordinator or company management. The foreman, supervisor, safety coordinator or company management shall conduct an on-site analysis and inspection of each accident and near miss. Investigations shall be conducted by using the *Supervisor Accident Investigation* or *Supervisor Incident Investigation* Report forms (see attached). A written report of the investigation shall be prepared and signed by the foreman, supervisor, safety coordinator or company management and shall be maintained by the company.
- All investigation reports shall be discussed at the next occurring safety meeting.
- All reports involving personal injury will be followed up with a meeting consisting of the employee involved, his/her supervisor, safety coordinator and Lamont and Lawrence Lavender. The purpose of this meeting will be to help the affected employee and all employees of Lavender, Inc. to understand how and why the accident occurred and how to avoid a similar incident in the future.

HAZARD IDENTIFICATION

- OSHA safety standards provide the basic safety requirements. Hazard identification is a continuous process, however, and all employees, supervisors and management must watch for and correct unsafe conditions. Safety standards and work rules shall be expanded as needed in accordance with ongoing hazard identification. A Job Safety Analysis will be conducted on each job site before work begins on that site.
- The company shall conduct on-site inspections, records reviews and accident investigations as part of its hazard identification program. The

company believes that employee feedback on existing safety standards and work rules is important, and such feedback is encouraged.

- Modification or deletion of a company safety standard or work rule shall be made only after consultation with a safety consultant and/or with OSHA.

ON-SITE INSPECTIONS

- The company shall conduct on-site inspections of construction operations. On-site inspections will be conducted at each new construction site or at least monthly by the safety coordinator or company management.
- The purpose of these inspections is to ensure compliance with OSHA safety standards, company safety standards and company work rules.
- When conducting inspections, the safety coordinator, foreman or supervisor shall identify hazards and problems at the work site to ensure that existing safety standards and work rules are adequate to ensure a safe work site.
- Inspections will include a review of safe work habits, proper tool usage, personal protective equipment and employee technique and skills.
- A written report of on-site inspections shall be made. In addition, each supervisor will be provided with a report and a report will be given to company management. Written reports will be maintained by the employer.

FIRST AID KITS

The safety coordinator, all foremen and supervisors shall be adequately trained in first aid methods as prescribed by the American Red Cross or an equivalent training program. In addition, one other person on each job site shall also have this training.

Location, Contents: The employer shall provide first aid kits in each tool trailer that is at a construction site and on each employee transport vehicle. The number of first aid kits and the contents of each kit shall reflect the degree of isolation, the number of employees and the hazards reasonably anticipated at the work site.

The following is deemed to be the minimally acceptable number and type of first aid supplies for first aid kits required for construction work sites. The contents of

the first aid kit listed should be adequate for small work sites, consisting of four or five employees. When larger operations or multiple operations are being conducted at the same location, additional first aid kits should be provided at the work site, or additional quantities of supplies should be included in the first aid kits.

- 1) Gauze pads (at least 4" x 4")
- 2) Two large gauze pads (at least 8" x 10")
- 3) Box of adhesive bandages (Band-Aids)
- 4) One package gauze roller bandage at least 2" wide
- 5) Two triangular bandages
- 6) Wound cleaning agent such as sealed, moistened towelettes
- 7) Scissors
- 8) At least one blanket
- 9) Tweezers
- 10) Adhesive tape
- 11) Latex gloves
- 12) Resuscitation equipment, such as a resuscitation bag, airway or pocket mask
- 13) Two elastic wraps (Ace Bandage)
- 14) Splint
- 15) Directions for requesting emergency assistance

Maintenance: The employer shall maintain the contents of each first aid kit in a serviceable condition.

First Aid Training: The employer shall assure that each supervisor and other key personnel receives first aid and CPR training meeting, at least, the requirements specified as outlined below:

- The following is deemed to be the minimal acceptable first aid and CPR training program for employees engaged in construction activities.
- First aid and CPR training shall be conducted using the conventional methods of training such as lecture, demonstration, practical exercise and examination (both written and practical). The length of training must be sufficient to assure that trainees understand the concepts of first aid and

can demonstrate their ability to perform the various procedures contained in the following outline.

- At a minimum, first aid and CPR training shall consist of the following:
 - The definition of first aid
 - legal issues of applying first aid (Good Samaritan Law)
 - Basic anatomy
 - Patient assessment and first aid for the following:
 - Respiratory arrest
 - Cardiac arrest
 - Hemorrhage
 - Lacerations/abrasions
 - Amputations
 - Musculoskeletal injuries
 - Shock
 - Eye injuries
 - Burns
 - Loss of consciousness
 - Extreme temperature exposure (hypothermia/hyperthermia)
 - Paralysis
 - Poisoning
 - Loss of mental functioning (psychosis/hallucination etc.)
 - Drug overdose
 - CPR
 - Application of dressings and slings
 - Treatment of strains, sprains and fractures
 - Immobilization of injured persons
 - Handling and transporting of injured persons
 - Treatment of bites, stings or contact with poisonous plants or animals

The employer shall assure that each employee's first aid and CPR training and /or certificate of training remain current.

Designated Person: All training shall be conducted by a designated person or persons.

LAVENDER, INC.

CONFINED SPACE PROGRAM & PROCEDURES

1. BACKGROUND

A confined space is defined as any location that has limited openings for entry and egress, is not intended for continuous employee occupancy, and is so enclosed that natural ventilation may not reduce air contaminants to levels below the threshold limit value (TLV). Examples of confined spaces include: manholes, stacks, pipes, storage tanks, trailers, tank cars, pits, sumps, hoppers, and bins. Entry into confined spaces without the proper precautions could result in injury and/or impairment or death due to:

- * An atmosphere that is flammable or explosive,
- * Lack of sufficient oxygen to support life,
- * Contact with or inhalation of toxic materials, or
- * General safety or work area hazards such as steam or high pressure materials.

The overall objectives of this procedure are to provide the minimum safety requirements to be followed while entering, exiting and working in confined spaces during environmental restoration work. This chapter provides pertinent details on the following:

- * Duties and responsibilities,
- * Identification and evaluation,
- * Hazard assessment,
- * Hazard controls,
- * Entry permits,
- * Entry procedures,
- * Opening a confined space,
- * Atmospheric testing,
- * Isolation and lockout/tagout safeguards,
- * Ingress/egress safeguards,
- * Warning signs and symbols,
- * Training, and
- * Emergency response

2. DUTIES AND RESPONSIBILITIES

2.1. This individual is responsible for implementing the confined space program in accordance with this procedure. Lavender, Inc. Safety Manager is responsible for implementing the confined space program and:

- * Ensuring that a list of confined spaces is maintained,
- * Ensuring that cancelled permits are reviewed for lessons learned,
- * Ensuring training of personnel is conducted,
- * Ensuring coordination with outside responders,
- * Ensuring equipment is in compliance with standards, and
- * Maintaining a master inventory of identified confined spaces.

2.2. Lavender, Inc. Job Superintendent is in charge of any confined space work and:

- * Ensuring requirements for entry have been completed before entry is authorized;
- * Ensuring confined space monitoring is performed by personnel qualified and trained in confined space entry procedures;
- * Ensuring a list of monitoring equipment and personnel qualified to operate the equipment is maintained by the Safety and Occupational Health Office;
- * Ensuring that the rescue team has simulated a rescue in a confined space within the past twelve months;
- * Knowing the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of exposure;
- * Filling out a permit;
- * Determining the entry requirements;
- * Requiring a permit review and signature from the authorized entry supervisor;
- * Notifying all involved employees of the permit requirements;
- * Posting the permit in a conspicuous location near the job;

- * Renewing the permit or have it reissued as needed (a new permit is required every shift);
- * Determining the number of attendants required to perform the work;
- * Ensuring the attendant knows how to communicate with the entrants and how to obtain assistance;
- * Posting any required barriers and signs;
- * Remaining alert to changing conditions that might affect the conditions of the permits, (i.e., require additional atmospheric monitoring or changes in personal protective equipment);
- * Changing and reissuing the permit, or issue a new permit as necessary;
- * Ensuring periodic atmospheric monitoring is done according to permit requirements;
- * Ensuring that personnel doing the work and all support personnel adhere to permit requirements;
- * Ensuring the permit is canceled when the work is done; and
- * Ensuring the confined space is safely closed and all workers are cleared from the area.

2.3. Entry Supervisors

An Entry Supervisor is a qualified person authorized to approve confined space entry permits. This person should be responsible for:

- * Determining if conditions are acceptable for entry,
- * Authorizing entry and overseeing entry operations,
- * Terminating entry procedures as required,
- * Serving as an attendant, as long as the person is trained and equipped appropriately for that role,
- * Ensuring measures are in place to keep unauthorized personnel clear of the area,
- * Checking the work at least twice a shift to verify and document permit requirements are being observed (more frequent checks should be made if operations or conditions are anticipated that could affect permit requirements),
- * Ensuring that necessary information on chemical hazards is kept at the work site for the employees or rescue team,

- * Ensuring a rescue team is available and instructed in their rescue duties (e.g., an onsite team or a prearranged outside rescue service), and
- * Ensuring at least one member of the rescue team has current certification in first aid and CPR.

2.4. Employees Entering Confined Space (Entrants)

Employees who are granted permission to enter a confined space should:

- * Read and observe the entry permit requirements;
- * Stay alert to the hazards that could be encountered in a confined space;
- * Use the protective equipment required by the permit;
- * Immediately exit the confined space when:
 - Ordered to do so by the attendant,
 - Automatic alarms sound,
 - They perceive they are in danger, or
 - They notice physiological stresses or changes in themselves or co-workers (e.g., dizziness, blurred vision, shortness of breath).

2.5.. Attendant

The Attendant should be stationed outside the work space and should:

- * Be knowledgeable of, and be able to recognize potential confined space hazards;
- * Maintain a sign-in/sign-out log with a count of all persons in the confined space and ensure all entrants sign in/sign-out;
- * Monitor surrounding activities to ensure the safety of personnel;
- * Maintain effective and continuous communication with personnel during confined space entry, work and exit;
- * Order personnel to evacuate the confined space if he/she:

- Observes a condition which is not allowed on the entry permit;
- Notices the entrants acting strangely, possibly as a result of exposure to hazardous substances;
- Notices a situation outside the confined space which could endanger personnel;
- Notices within the confined space a hazard which has not been previously recognized or taken into consideration;
- Must leave his/her work station; or
- Must focus attention on the rescue of personnel in some other confined space that he/she is monitoring;
- * Immediately summon the Rescue Team if crew rescue becomes necessary; and
- * Keep unauthorized persons out of the confined space, order them out, or notify authorized personnel of the unauthorized entry.

2.6. Rescue Team

The Rescue Team members should:

- * Complete a training drill using mannequins or personnel in a simulation of the confined space prior to the issuance of an entry permit for any confined space and at least annually thereafter;
- * Respond immediately to rescue calls from the Attendant or any other person recognizing a need for rescue from the confined space;
- * In addition to emergency response training, receive the same training as that required of the authorized entrants; and
- * Have current certification in first-aid and CPR.

3. Identification and Evaluation

The Project Manager should ensure a survey is conducted of the work site to identify confined spaces. This survey can be partially completed from initial and continuing site characterizations, as well as other available data (e.g.

blueprints, job safety analysis). The purpose of the survey is to develop an inventory of those locations and/or equipment that meet the definition of a confined space. This information should be communicated to personnel and appropriate procedures developed prior to entry. The initial surveys should include air monitoring to determine the air quality in the confined spaces. The following situations should be evaluated by competent personnel:

- * Flammable or explosive potential,
- * Oxygen deficiency, and
- * Presence of toxic and corrosive material.

4. Hazard Re-Evaluation

The Project Manager should ensure the identification and re-evaluation of the hazards based on possible changes in activities, and/or other physical or environmental conditions, which could adversely affect work. A master inventory of confined spaces should be maintained. Any change in designation of a confined space will be routed through the Site Safety and Health Officer (SSHO) for review, prior to the change being made.

5. Hazard Assessment

A hazard assessment should be completed prior to any entry into a confined space. The hazard assessment should identify the sequence of work to be performed in the confined space, the specific hazards known or anticipated, and the control measures to be implemented to eliminate or reduce each of the hazards to an acceptable level. No entry should be permitted until the hazard assessment has been reviewed and discussed by all persons engaged in the activity. Personnel who enter confined spaces should be informed of known or potential hazards associated with the confined spaces to be entered.

6. Hazard Controls

Hazard controls include changes in the work processes and/or working environment with the objective of:

- * Controlling the health hazards either by eliminating the responsible agents,
- * Reducing health hazards below harmful levels, and
- * Preventing the contaminants from coming into contact with the workers.

The following order of precedence should be followed in reducing confined space risks:

- * Engineering controls, such as ventilation to limit exposure to hazards;
- * Work practice controls, such as wetting of hazardous dusts, frequent cleaning; and
- * Use of PPE, such as air purifying or supplied-air respirators.

6.1. Engineering Controls

Engineering controls are those controls which eliminate or reduce the hazard through implementation of sound engineering practices.

Ventilation is one of the most common engineering controls used in confined spaces. When ventilation is used to remove atmospheric contaminants from the confined space, the space should be ventilated until the atmosphere is within the acceptable ranges. Ventilation should be maintained during the occupancy if there is a potential for the atmospheric conditions to move out of the acceptable range. When ventilation is not possible or feasible, alternate protective measures or methods to remove air contaminants and protect occupants should be determined by the qualified person prior to authorizing entry.

Conditions regarding continuous forced air ventilation should be used as follows:

- * Employees should not enter the space until the forced air ventilation has eliminated any hazardous atmosphere,
- * Forced air ventilation should be so directed as to ventilate the immediate areas where an employee is or will be present within the space,
- * Continuous ventilation is maintained until all employees have left the space, and
- * Air supply for forced air ventilation should be from a clean source.

6.2. Work Practice (Administrative) Controls

Work practice (administrative) controls are those controls which eliminate or reduce the hazard through changes in the work practice (e.g., rotating workers, reducing the amount of worker exposure, and housekeeping). Confined spaces should be cleaned/decontaminated of hazardous materials to the extent feasible before entry. Cleaning/decontamination should be the preferred method of reducing exposure to hazardous materials. Where this is not practicable, PPE should be worn by the entry personnel to provide appropriate protection against the hazards which may be present.

6.3. Personal Protective Equipment (PPE)

If the hazard cannot be eliminated or reduced to a safe level through engineering and/or work practice controls, PPE should be used. A qualified person should determine PPE needed by all personnel entering the confined space, including rescue teams. PPE which meet the specifications of applicable standards should be selected in accordance with the requirements of the job to be performed.

7. Entry Permits

The Confined Space Entry Permit is the major tool in assuring safety during entry in confined spaces with known hazards or with unknown or potentially hazardous atmospheres. The entry permit process guides the supervisor and workers through a systematic evaluation of the space to be entered. The permit should be used to establish appropriate conditions. Before each entry into a confined space, an entry permit will be completed by a qualified person and the contents communicated to all employees involved in the operation and conspicuously posted near the work location. A standard entry permit should be used for all entries.

7.1. Key Elements for Entry Permits

A standard entry permit should contain the following items:

- * Permit space to be entered;
- * Purpose of the entry;
- * Date of the permit and the authorized duration of the entry permit,
- * Name of authorized entrants within the permit space;
- * Means of identifying authorized entrants inside the permit space, e.g., rosters or tracking systems;
- * Personnel, by name, currently serving as attendants,
- * Individual, by name, currently serving as entry supervisor, with a space for the signature or initials of the entry supervisor who originally authorized entry,
- * Hazards of the permit space to be entered,
- * Measures used to isolate the permit space and to eliminate or control permit space hazards before entry, e.g., lockout or tagout of equipment and procedures for purging, inerting, ventilating, and flushing permit spaces;
- * Acceptable entry conditions,

- * Results of initial and periodic tests performed, accompanied by the names or initials of the testers and by an indication of when the tests were performed;
- * Rescue and emergency services that can be summoned and the means, (e.g., equipment to use, phone numbers to call) for summoning those services,
- * Communication procedures used by authorized entrants and attendants to maintain contact during the entry,
- * Equipment to be provided for compliance with this section, (e.g., PPE, testing, communications, alarm systems, and rescue);
- * Other information whose inclusion is necessary, given the circumstances of the particular confined space, in order to ensure employee safety; and
- * Additional permits, such as for hot work, that have been issued to authorize work on the permit space.

A permit is only valid for one shift. For a permit to be renewed, several conditions should be met before each re-entry into the confined space. First, atmospheric testing should be conducted and the results should be within acceptable limits. If atmospheric test results are not within acceptable limits, precautions to protect entrants against the hazards should be addressed on the permit and should be in place. Second, a qualified person should verify that all precautions and other measures called for on the permit are still in effect. Finally only operations or work originally approved on the permit should be conducted in the confined space.

A new permit should be issued or the original permit reissued whenever changing work conditions or work activities introduce new hazards into the confined space. The employer should retain each cancelled entry permit for at least one year to facilitate the review of the confined space entry program. Any problems encountered during an entry operation should be noted on the pertinent permit so that appropriate revisions to the confined space permit program can be made.

8. Entry Procedures

Whenever entry into a confined space is needed, either an Entry Supervisor or the person in charge of the job may initiate entry procedures, including the completion of a confined space entry permit. Entry into a confined space should follow the standard entry procedure.

The following are requirements for standard entry:

- * Training to establish personnel proficiency in the duties required,
- * Atmospheric testing for entry, and
- * Atmospheric monitoring during the entry.

Before an employee enters the space, the internal atmosphere should be tested with a calibrated, direct-reading instrument. If a hazardous atmosphere is detected during entry:

- * The space should be evaluated to determine how the hazardous atmosphere developed, and
- * Measures should be implemented to protect employees before any subsequent entry takes place.

Personnel should be prohibited from entering hazardous atmospheres without wearing proper respiratory equipment as determined by qualified entry supervisors. The entire confined space entry permit should be completed for a standard entry. Entry should be allowed only when all requirements of the permit are met and it is reviewed and signed by an Entry Supervisor.

8.1 Opening a Confined Space

Any conditions making it unsafe to remove an entrance cover should be eliminated before the cover is removed. When entrance covers are removed, the opening should be promptly guarded by a railing,

temporary cover, or other temporary barrier that will prevent anyone from falling through the opening. This barrier or cover should protect each employee working in the space from foreign objects entering the space. If it is in a traffic area, adequate barriers should be erected.

8.2. Atmospheric Testing

Atmospheric test data is needed prior to entry into any confined space. Atmospheric testing is required for two distinct purposes: evaluation of the hazards of the permit space and verification that acceptable conditions exist for entry into that space. If a person must go into the space to obtain the needed data, then Standard Confined Space Entry Procedures should be followed (i.e., rescue team, attendant, entry supervisor). Before entry into a confined space, a qualified person should conduct testing for hazardous atmospheres. The internal atmosphere should be tested with a calibrated, direct-reading instrument for the following, in the order given:

- * Oxygen content,
- * Flammable gases and vapors, and
- * Potential toxic air contaminants.

Testing equipment used in specialty areas should be listed or approved for use in such areas. This listing or approval should be from nationally recognized testing laboratories such as Underwriters Laboratories or Factory Mutual Systems.

8.2.1. Evaluation Testing

The atmosphere of a confined space should be analyzed using equipment of sufficient sensitivity and specificity. The analysis should identify and evaluate any hazardous atmospheres that may exist or arise, so that appropriate permit entry procedures can be developed and acceptable entry conditions stipulated for that space. Evaluation

and interpretation of these data and development of the entry procedure should be done by, or reviewed by, a technically qualified professional (e.g., OSHA consultation service, certified industrial hygienist, registered safety engineer, certified safety professional).

8.2.2. Verification Testing

A confined space which may contain a hazardous atmosphere should be tested for residues of all identified or suspected contaminants. The evaluation testing should permit specified equipment to determine that residual concentrations at the time of testing and entry are within acceptable limits. Results of testing (i.e., actual concentration) should be recorded on the permit. The atmosphere should be periodically retested to verify that atmospheric conditions remain within acceptable entry parameters. Initial testing of atmospheric conditions and subsequent tests after a job has been stopped should be done with the ventilation systems shut down. If the confined space is vacated for any period of time, the atmosphere of the confined space should be retested before re-entry is permitted. Further testing should be conducted with ventilation systems turned on to ensure the contaminants are removed and that the ventilation system is not causing a hazardous condition.

8.2.3. Acceptable Limits

The atmosphere of the confined spaces should be considered within acceptable limits whenever the following conditions are maintained:

- * Oxygen - 19.5% to 23.5%,
- * Flammability - less than 10% of the Lower Flammable Limit (LFL),
and
- * Toxicity - less than recognized ACGIH exposure limits or other published exposure levels (e.g. OSHA PELs, NIOSH RELs).

Whenever testing of the atmosphere indicates levels of oxygen, flammability, or toxicity that are not within acceptable limits, entry should be prohibited until appropriate controls are implemented. If the source of the contaminant cannot be determined, precautions should be adequate to deal with the worst possible condition in the confined space. If there is the possibility that the confined space atmosphere can become unacceptable while the work is in progress, the atmosphere should be constantly monitored and procedures and equipment should be provided to allow the employees to quickly and safely exit the confined space.

9.. Isolation and Lockout / Tagout Safeguards

All energy sources which are potentially hazardous to confined space entrants should be secured, relieved, disconnected and/or restrained before personnel are permitted to enter the confined space. Equipment systems or processes should be locked out or tagged out or both per 29 CFR 1910.147 and ANSI Z244.1-1982, Lockout/Tagout of Energy Sources prior to permitting entry into the confined space. The current lockout/tagout program being used at the site should be used as guidance. In confined spaces where complete isolation is not possible, provisions should be made for as rigorous an isolation as practical. Special precautions should be taken when entering double walled, jacketed, or internally insulated confined spaces that may discharge hazardous material through the vessel's internal wall.

Where there is a need to test, position or activate equipment by temporarily removing the lock or tag or both, a procedure should be developed and implemented to control hazards to the occupants. Any removal of locks, tags, or other protective measures should be done in accordance with ANSI Z244.1-1982.

10.. Ingress / Egress Safeguards

Means for safe entry and exit should be provided for confined spaces. Each entry and exit point should be evaluated to determine the most effective methods and equipment to be utilized to enable employees to safely enter and exit the confined space.

Appropriate retrieval equipment or methods should be used whenever a person enters a confined space. Use of retrieval equipment may be waived by the designated qualified persons if use of the equipment increases the overall risks of entry or does not contribute to the rescue. A mechanical device should be available to retrieve personnel from vertical type confined spaces greater than five feet in depth.

11. Warning Signs and Symbols

All confined spaces that could be inadvertently entered should have signs identifying them as confined spaces. Signs should be maintained in a legible condition. The signs should contain a warning that a permit is required before entry. Accesses to all confined spaces should be prominently marked.

12. Training

The employer should provide training so that all employees whose work is regulated by this section acquire the understanding, knowledge, and skills necessary for the safe performance of their duties in confined spaces. Training should be provided to each affected employee:

- * Before the employee is first assigned duties under this section,
- * Before there is a change in assigned duties,

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

The training should establish employee proficiency in the duties required by this section and should introduce new or revised procedures, as necessary, for compliance with this section.

12.1. General Training

All employees who will enter confined spaces should be trained in entry procedures. Personnel responsible for supervising, planning, entering or participating in confined space entry and rescue should be adequately trained in their functional duties prior to any confined space entry. Training should include:

- * Explanation of the general hazards associated with confined spaces;
- * Discussion of specific confined space hazards associated with the facility, location or operation;
- * Reason for, proper use, and limitations of PPE and other safety equipment required for entry into confined spaces;
- * Explanation of permits and other procedural requirements for conducting a confined space entry;
- * A clear understanding of what conditions would prohibit entry;
- * How to respond to emergencies;

- * Duties and responsibilities as a member of the confined space entry team; and
- * Description of how to recognize symptoms of overexposure to probable air contaminants in themselves and co-workers, and method(s) for alerting attendants.

Refresher training should be conducted as needed to maintain employee competence in entry procedures and precautions.

12.2. Specific Training

12.2.1. Training for Atmospheric Monitoring Personnel

Training should include proper use of monitoring instruments such as:

- * Proper use of the equipment;
- * Knowledge of calibration;
- * Knowledge of sampling strategies and techniques; and
- * Knowledge of PELs, TLVs, LELs, UELs, etc.

12.2.2. Training for Attendants

Training should include the following:

- * Procedures for summoning rescue or other emergency services, and
- * Proper utilization of equipment used for communicating with entry and emergency/rescue personnel.

12.2.3. Training for Emergency Response Personnel

Training should include:

- * Rescue plan and procedures developed for each type of confined space that are anticipated to be encountered,
- * Use of emergency rescue equipment,
- * First aid and CPR techniques, and
- * Work location and confined space configuration to minimize response time.

12.2.4. Verification of Training

Periodic assessment of the effectiveness of employee training should be conducted by a qualified person. Training sessions should be repeated as often as necessary to maintain an acceptable level of personnel competence.

13. Emergency Response

13.1. Emergency Response Plan

A plan of action should be written with provisions to conduct a timely rescue for individuals in a confined space should an emergency arise.

13.2. Retrieval Systems or Methods to Facilitate Non-entry Rescue

Retrieval systems should be used whenever an authorized person enters a permit space, unless the equipment increases the overall risk of entry or the equipment would not contribute to the rescue of the entrant. Retrieval systems should have a chest or full body harness and a retrieval line attached at the center of the back near shoulder level or above the head. If harnesses are not feasible or create a greater hazard, wristlets may be used in lieu of the harness. The retrieval line should be firmly fastened outside the space so that rescue can begin as soon as anyone is aware that retrieval is necessary. A mechanical device should be available to retrieve personnel from vertical confined spaces more than five feet deep.

LAVENDER, INC.

HAZARD COMMUNICATION PLAN

The following Hazard Communication Program is based on the requirements of the OSHA Hazard Communications Standard, 29 CFR 1910.1200.

1. Company Policy

To ensure that information about the dangers of all hazardous chemicals used by Lavender, Inc. is known by all affected employees, the following hazardous information program has been established. Under this program, you will be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All work units of this company will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the Main Office Building for review by any interested employee.

The Safety Manager is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

2. Container Labeling

The job supervisor / tool room attendant will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address. The job supervisor / tool room attendant in each section will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and appropriate hazard warning. No original labels are to be removed from any container. Labels will be made for any chemicals that are used out of their

original containers. These labels will be placed on the container whenever possible, or will be placed near the container so that the information can be immediately accessed if necessary. We are using the standard NFPA (National Fire Protection Association) label showing flammability, health hazard and reactivity of the chemicals by numerical severity.

The Safety Manager will review the company labeling procedures annually and will update/replace labels as required.

3. Safety Data Sheets (SDSs)

The Safety Manager or his designee is responsible for establishing and monitoring the company SDS program. He/she will ensure that procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. He/she will see that any new information is communicated to affected employees. This person is responsible for calling the supplier/manufacturer if an SDS is not received at the time of initial shipment.

Copies of SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the following location(s): Lavender, Inc. shop office / tool trailer.

SDSs will be readily available to all employees during each work shift. If an SDS is not available, contact the safety department at (205) 373-8387 ext. 36 or 42.

SDSs will be readily available to employees in each work area using the following format: A hard copy will be located at each job location for the substances being used. A master list of all SDSs will be available on company server.

When revised SDSs are received, the old MSDSs/SDSs should be removed from the notebook and discarded and new labels should be made (if the chemical is one of those out of its original container).

4. Employee Training and Information

The Safety Manager is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work. Each new employee will attend a health and safety orientation that includes the following information and training:

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps the company has taken to reduce or prevent exposure to hazardous chemicals
- How to read labels and SDSs to obtain hazard information
- Location of the SDS file and written Hazard Communication program

Prior to introducing a new chemical hazard into any section of this company, each employee in that section will be given information and training as outlined above for the new chemical hazard. The training format will be as follows: Each supervisor will instruct his crew on potential hazards and means to avoid such hazards along with corrective measures if exposure is experienced.

5. Hazardous Non-routine Tasks

Employees may be required to perform non-routine tasks that could expose them to hazardous chemicals.

Prior to starting work on such projects, each affected employee will be given information by the supervisor about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

6. Informing Other Employers/Contractors

It is the responsibility of Lavender, Inc. Safety Manager or his designee to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions for employees.

It is the responsibility of Lavender, Inc. Safety Manager or his designee to obtain information about hazardous chemicals used by other employers to which employees of this company may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals generated by this company's operations in the following manner: SDSs will be physically handed, e-mailed or faxed to other companies that may be affected by such chemicals.

In addition to providing access to copies of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by this company. Also, other employers will be informed of the hazard labels used by the company. If symbolic or numerical labeling systems are used, the other employees will be provided with information to understand the labels used for hazardous chemicals for which their employees may have exposure.

7. List of Hazardous Chemicals

A list of all known hazardous chemicals used by our employees is attached to this plan. This list includes the name of the chemical and the manufacturer. Further information on each chemical may be obtained from the SDSs, located in Aliceville, AL at the shop office or on the company's computer system.

When new chemicals are received, this list is updated and the SDS is properly filed within thirty (30) days.

The hazardous chemical inventory is compiled and maintained by _____, at our fabrication shop office in Aliceville, AL.

8. Program Availability

A copy of this program will be made available, upon request, to employees and their representatives.

LAVENDER, INC.

LOCKOUT / TAGOUT PROCEDURE

PURPOSE:

This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done on machines or equipment. It shall be used to ensure that the machined or equipment is stopped, isolated from all potentially hazardous energy sources and locked/tagged out before employees perform any servicing or maintenance where the unexpected energization or start-up of the machine or equipment or release of stored energy could cause injury or damage.

COMPLIANCE:

All employees are required to comply with the restrictions and limitations imposed upon them during the use of lockout/tagout. The authorized employees are required to perform the lockout/tagout in accordance with this procedure. All employees, upon observing a machine or piece of equipment which is locked out/tagged out to perform servicing or maintenance shall not attempt to start, energize, or use that machine or equipment.

Non-compliance of the above statements will result in disciplinary action up to and including termination of employment.

SEQUENCE OF LOCKOUT/TAGOUT:

Lavender, Inc. supervisor shall notify all affected employees that servicing or maintenance is required on a machine or equipment and that the machine or

equipment must be shut down and locked out / tagged out to perform the servicing or maintenance.

Lavender, Inc. supervisor shall identify the type and magnitude of the energy that the machine or equipment utilizes, shall understand the hazards of the energy and shall know the methods to control the energy.

If the machine or equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open switch, close valves, etc).

De-activate the energy isolating device(s) so that the machine or equipment is isolated from the energy source(s).

Lavender, Inc. supervisor shall lockout/tagout the energy isolating device(s) with his lock and identification tag.

Stored or residual energy (such as that in capacitors, springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc.) must be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.

Lavender, Inc., supervisor will ensure that the machine or equipment is 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 push button or other normal operating control(s) or by testing to make certain the equipment will not operate.

Caution: Return operating control(s) to neutral or “off” position after verifying the isolation of the machine or equipment.

The supervisor then places his key in a lock box identifying machine or equipment that is locked out/tagged out. Each employee that is to perform work on machine or equipment will then attach their personal lock and identification tag to the lock box. This will insure that the machine or equipment that they are working on will not be started or energized.

The machine or equipment is now locked out.

RESTORING EQUIPMENT TO SERVICE:

When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps shall be taken.

Check the machine or equipment and the immediate area around the machine or equipment to insure that nonessential items have been removed and that the machine or equipment components are operationally intact.

Check the work area to insure that all employees have been safely positioned or removed from the area.

Verify that the controls are in neutral or off position.

After each employee has removed their personal locks and tags from the lock box, the Lavender, Inc. supervisor will retrieve his key from said lock box and remove his lock and tag from the isolation device(s).

Notify all affected employees that the servicing or maintenance is completed and the machine or equipment is ready for use.

LAVENDER, INC.

EMPLOYEE ALCOHOL & DRUG POLICY

A. PURPOSE & DEFINITION

The purpose of this document is to state the Lavender, Inc. *Employee Alcohol and Drug Policy*. This policy is designed to provide and maintain a drug-free environment at all Lavender locations. All lavender vehicles and equipment fall under this policy whether the employee is on or off duty.

B. SCOPE

This policy prohibits the use, possession, transfer, sale or purchase of any illegal or Controlled substances and/or paraphernalia; the use or possession of alcohol; the use of opiates or amphetamines without proper prescription; and the use of designer drugs. Violations of this policy are grounds for termination and/or prosecution.

C. TESTING PROCEDURES

Lavender reserves the right to require testing under the following circumstances:

- a. As pre-employment qualification
- b. When an employee has worked at a Lavender location for more than twelve (12) months since his/her last test.

- c. When an employee is involved in an accident which results in property damage or bodily injury.
 - d. When an employee is involved in a near-miss incident.
2. As a precautionary measure, Lavender further reserves the right to administer random testing.
3. If an employee refuses to submit to testing, that employee will be considered in violation of policy.
4. All testing shall be performed by a certified laboratory at Lavender's expense.

D. CONFIDENTIALITY

The results and records of tests are considered confidential and shall not be discussed with anyone who does not need to know.

BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN

FOR

LAVENDER, INC.

1056 INDUSTRIAL DRIVE

ALICEVILLE, AL 35442

April 21, 2006

In accordance with the OSHA Bloodborne Pathogens Standard, 29 CFR 1910.1030, the following exposure control plan has been developed:

A. Purpose

The Bloodborne Pathogens Exposure Program is to reduce occupational exposure to bloodborne pathogens.

B. Exposure Determination

Designated employees that may come into contact with human blood or other potentially infectious materials (OPIM):

1. Foremen
2. Supervisors
3. Safety Tech
4. Tool Room Attendants
5. Time Keepers

C. Methods of Compliance

Universal Precautions will be utilized in the handling of all human blood and OPIM's.

D. Engineering Controls

1. Hand sinks are located in all departments and are readily accessible to all employees who have the potential for exposure.

2. Employees will wash their hands and any other exposed skin with soap and hot water immediately or as soon as possible after contact with blood or OPIM, for 15 seconds, in a manner causing friction on both inner and outer surfaces of the hands.

3. Employees will be provided with antiseptic hand cleaner and paper towels when hand washing is not feasible. However, hand washing must still take place as soon as possible after exposure.

4. Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is the potential for exposure to bloodborne pathogens.

5. If professional medical attention is required, a local ambulance will be the first choice, a company vehicle will be the second. If a company vehicle or personal vehicle is taken; impervious material should be used to prevent contamination of the vehicle.

6. New employees will receive training about any potential exposure from the safety officer.

E. Personal Protective Equipment

All personal protective equipment used at this facility and other locations will be provided without cost to employees. Personal protective equipment will be chosen based on the anticipated exposure to blood or OPIM. The protective equipment will be considered appropriate only if it does not permit blood or OPIM to pass through or reach the employee's clothing, skin, eyes, mouth, or other mucous membranes under normal conditions of use.

F. Disposal of Contaminated Items and Communication of Hazard

1. Employees must:

- a. use bleach to disinfect any blood or OPIM
- b. apply the bleach with single-use gloves and allow to sit for 15 minutes
- c. place any single-use gloves that have been contaminated in a biohazard garbage bag and cover.
- d. dispose of the bag in accordance with state regulations where you are working.

2. Regulated waste should be placed in appropriate containers, label and dispose of in accordance with applicable state, federal and local laws.

3. Employees will be warned of biohazard bags by labels attached to the disposal bags. Labels used will be orange-red and marked with the word **BIOHAZARD** or the biohazard symbol.

G. Housekeeping

Maintaining our work areas in a clean and sanitary condition is an important part of Lavender, Inc.'s Bloodborne Pathogens Compliance Program. Employees must decontaminate working surfaces and equipment with an appropriate disinfectant after completing procedures involving blood or OPIM. All equipment,

environmental surfaces and work surfaces shall be decontaminated immediately or as soon as feasible after contamination.

1. Employees must clean and disinfect when surfaces become contaminated and after any spill of blood or OPIM.
2. Employees will use a solution of one part bleach to ten parts water for cleaning and disinfecting.
3. Working surfaces and equipment will be routinely cleaned, disinfected and maintained.
4. Potentially contaminated broken glass will be picked up using mechanical means, such as dust pan and brush, tongs, etc.
5. Lavender, Inc. uses universal precautions for handling of all soiled laundry.
6. Laundry contaminated with blood or OPIM will be handled as little as possible. Employees who handle contaminated laundry will utilize personal protective equipment to prevent contact with blood or OPIM from coming into contact with skin or street clothes.
7. Contaminated clothing will remain on the premises, or will be sent directly to a laundry facility for cleaning. Employees will be given the option of reimbursement for the cost of contaminated clothing and the clothing will be disposed.

H. Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-Up

Lavender, Inc. shall make available, within 10 days of possible exposure, the Hepatitis B Vaccine and vaccination series to all employees who have occupational exposure.

Employees who initially decline the vaccine, but who later wish to have it, shall then have the vaccine provided at no cost. Any employee who declines the vaccine shall sign a “**Declination Statement**” a copy of which is attached hereto.

An exposure incident is any contact of blood or OPIM’s with non-intact skin or mucous membranes. Any employee having an exposure incident shall contact Lavender, Inc. safety representative. All employees who have an exposure incident will be offered a confidential post- exposure evaluation and follow-up in accordance with the OSHA standard. This includes a visit to a physician selected by the employer. The health care professional written opinion will be provided to the employee within fifteen (15) days of the evaluation.

I. Training

Training is provided at the time of initial assignment to tasks where occupational exposure may occur, and that it shall be repeated within twelve (12) months of the previous training. Training shall be tailored to the education and language level of the employee, and offered during the normal work shift. The training will be interactive and cover the following:

- a. A copy of the standard and an explanation of its contents;
- b. A discussion of the epidemiology and symptoms of bloodborne diseases;
- c. An explanation of the Lavender, Inc. Bloodborne Pathogen Exposure Control Plan (this program), and a method for obtaining a copy;
- d. An explanation of the modes of transmission of bloodborne pathogens;
- e. The recognition of tasks that may involve exposure;
- f. An explanation of the use and limitations of methods to reduce exposure, for example: engineering controls, work practices and personal protective equipment;

- g. Information on the types, use, location, removal, handling, decontamination, and disposal of PPE;
- h. An explanation of the basis of selections of PPE;
- i. Information on the Hepatitis B vaccination, including efficacy, safety, method of administration, benefits, and that it will be offered free of charge;
- j. Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM;
- k. An explanation of the procedures to follow if an exposure incident occurs, including the method of reporting and medical follow-up;
- l. Information on the evaluation and follow-up required after an employee exposure incident;
- m. An explanation of the signs, labels, and color-coding systems.

The person conducting the training shall be knowledgeable in the subject matter.

J. Recordkeeping

Medical records shall be maintained in accordance with OSHA Standards. The records shall be kept confidential, and must be maintained for at least the duration of employment plus thirty (30) years.

DECLINATION STATEMENT

I understand that due to my occupational exposure to blood or other potentially 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 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

LAVENDER, INC.

CELL PHONE POLICY

Reported Hazards Associated With Cell Phones @ Work

- Users are said to be distracted and less responsive. If they do react, their response time is said to be longer.
- Users are likely to have intense conversations that involve problem solving – which is distracting.
- Users may be concentrating on dialing a number or answering a call, and fail to be aware of a dangerous situation.
- Not only is the user putting him/herself at risk for potential injury, but their co-workers as well.

Taking all of these into consideration, Lavender, Inc. is implementing a new Company Policy. No longer will cell phones be allowed on your person during working hours. You must keep your cell phone in your lunch box or vehicle except for breaks and lunch. Any employee violating this Company Policy will be reprimanded and subject to disciplinary action up to and including discharge.

This is not meant to apply any unnecessary hardship on anyone. Lavender's Supervisors all carry radios and cell phone for Company business. In case of emergency, you will be given access to a phone.

LAVENDER, INC.

EARLY RETURN-TO-WORK POLICY STATEMENT

To all employees:

It is the policy of LAVENDER, INC. to maintain and support an Early Return-to-Work Program. This program is designed to minimize the disruption and uncertainty that can accompany an on-the-job injury for both the company and our employees.

It is our goal to maintain a safe workplace for our employees. When an injury does occur, our Early Return-to-Work Program helps make the process of returning to work as smooth and efficient as possible. This process includes the employee, doctor and supervisor to ensure your health and recovery is always given top priority.

When an on-the-job injury occurs, you can expect prompt medical attention. If the injury results in a prolonged absence from work, you may be a candidate for our Early Return-to-Work Program. This program offers a medically approved light-duty transitional assignment in anticipation of a return to full duty, or vocational rehabilitation, if necessary.

The success of this program is the responsibility of everyone in the company from top management to every employee. Only by working together can we provide a safe and secure work environment.

Everyone should be alert for potential accidents and strive to eliminate them. If you are aware of an unsafe act or condition, it should be reported immediately to your supervisor to be addressed. This action may prevent an injury from occurring. If an injury does occur, the injury must be reported immediately to a supervisor.

Thank you for your cooperation and assistance.

LAVENDER, INC.

EARLY RETURN-TO-WORK POLICY PROCEDURES

1. An employee who is injured at work must immediately report the incident to their supervisor.

2. The supervisor is required to:
 - Obtain immediate medical attention for the injured worker;
 - Follow company requirement for reporting job related injuries and illnesses;
 - Complete an incident investigation report.

3. The supervisor and injured worker review information received from the doctor and jointly determine if appropriate work is available.

4. The injured worker is responsible for following medical instructions on and off the job.

5. Following an injured worker's return to work, the supervisor or the return to work coordinator monitors the injured worker's progress to assure that restrictions are carefully followed and assist to resolve any difficulties.

6. The injured worker must immediately report any difficulties with performing assigned work. Supervisor and injured worker work to address the problem.

LAVENDER INC.

ROLES AND RESPONSIBILITIES

EMPLOYER RESPONSIBILITIES

- Provide a safe work environment;
- Develop written return to work policies and procedures;
- Educate all employees about the program;
- Train employees on proper reporting of incidents and incident investigation;
- Promptly report job related injuries to the insurance carrier;
- Provide information to employees about the workers' compensation system and benefits;
- Regularly communicate with the injured worker during the time away from work and monitor progress upon the injured worker's return;
- Make every effort to develop and provide meaningful return to work opportunities;
- Communicate with the treating doctor and insurance carrier to encourage recovery and return to work;
- Develop functional job descriptions and identify physical requirements that clearly identify physical activities required to do the work.

EMPLOYEE RESPONSIBILITIES

- Know and follow safety policies and procedures;
- Report any injury immediately;
- If medical attention is necessary, inform your treating doctor that return to work opportunities are available to accommodate your physical abilities;
- Notify your supervisor immediately of your work status changes;
- When your doctor releases you to return to work, report on the next regular shift; and
- Follow your doctor's orders and restrictions at home and at work.

INSURANCE CARRIER RESPONSIBILITIES

- Ensure proper administration of all workers' compensation claims;
- Maintain communication with the injured employee, health care providers, and the employer;
- Encourage and actively assist injured workers in the successful return to work.
- **Carriers are required to furnish, at the employers' request, return to work services beginning on the 8th day of lost time.** (Requirement enacted as part of HB 2600, 2001 Legislature.)

HEALTH CARE PROVIDER RESPONSIBILITIES

- Provide appropriate, effective medical treatment that facilitates recovery and expedites return to productive work; and
- Complete and file the TWCC-73, Work Status Report as required, clearly indicating the employee's work status and physical abilities.
- Set reasonable return to work and recovery goals from the beginning of treatment.
- Work with employer to encourage appropriate return to work opportunities

