



## **SAFETY MANUAL**

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## **I.**

### **INTRODUCTION**

Accident costs are viewed not only in terms of dollars, but in terms of human pain and suffering as well. Our employees are a valuable asset to our company. Therefore, our primary goal is to prevent accidents in order to protect the health and welfare of our employees, and to reduce the impact that those injuries have on employees' families, relatives, and friends.

The control of workplace accidents is an essential element for the success of our company. This accident prevention plan has been established to help our company meet its goal of zero accidents.

All employees are expected to become familiar with the contents of this plan, and to follow the guidance contained herein.

## **SAFETY POLICY**

Shenandoah Steel's policy is to provide a safe and healthful place of employment for every employee and to abide by accident prevention regulations set forth by Federal, State and Local governments. This means we will:

- Provide rules and regulation for the safety of employees and to warn them under certain conditions as to the hazards of their position or employment. This includes the duty to supervise.
- Furnish reasonably safe facilities and equipment. Included in this is the duty to inspect and repair.
- Provide a reasonably safe place to work.
- Exercise ordinary care to select careful and competent fellow servants.

We are sincerely interested in the safety and welfare of our employees. We further believe that accident prevention is essential in maintaining an efficient operation. Therefore, Bonnie Mendelson, owner will be responsible for implementing and supervising Shenandoah Steel's safety program.

It is our policy that the rules listed on the following be observed at all times. Although these rules are considered to be very important, it is impossible to publish a rule to cover every circumstance. If a rule that might cover any specific safety hazard has been omitted, that shall be no excuse for carelessness or a disregard for performance of your work. Abuse or disregard of these rules is a violation of company policy and will be treated accordingly.

As an employee of Shenandoah Steel you automatically accept a moral obligation for the safety of yourself and economic obligation to the company to see that operation under your custody and control are performed in an efficient and safe manner. We should all strive for a record of zero accidents.

Bonnie Mendelson, Owner  
Shenandoah Steel, L.L.C

## **ACCIDENT PREVENTION RESPONSIBILITIES**

The prevention of accidental injury and property damage must receive top priority attention at all levels of Shenandoah Steel.

Accident prevention is a functional responsibility of each manager, supervisor and employee. Our managers must demand safe operations on the part of employees under their control. It is the supervisor's responsibility to teach employees to work safely. However, each level of Shenandoah Steel will be held accountable for accident prevention.

Accident prevention responsibilities for all levels of Shenandoah Steel are as follows:

### **COMPANY MANAGEMENT:**

1. Provide resources needed for proper administration of the safety program.
2. Formulate and/or approve changes to the safety program.
3. Establish initial and recurring training requirement for all employees.
4. Establish programs and activities that will develop and maintain incentives for, and motivation of, employees for safe work practices.
5. Participate actively and visibly in the safety program.
6. Establish disciplinary procedures for violators of safety rules.

### **SAFETY DIRECTOR:**

1. Provide services and technical advice needed for proper administration of the safety program.
2. Provide guidance and programs to identify and remove physical hazards from work sites.
3. Formulate and recommend changes to the safety program.
4. Inspect work sites to observe and correct unsafe conditions and work practices.
5. Maintain an effective system for reporting and investigating all accidents.
6. Review reports of accident investigations to determine if corrective actions are adequate to prevent recurrence.
7. Prepare and distribute to management regular reports on results of the safety program.

8. Insure full compliance with Federal, State and Local regulations.

### **SUPERINTENDENT:**

1. Know and enforce all Federal, State and Local regulations.
2. Ensure that required safety equipment is available at work sites and in serviceable condition.
3. Inspect work areas and take direct actions to correct unsafe conditions and work practices.
4. Train First Line Supervisors in their responsibilities for maintaining safe conditions and work practices at their work sites.
5. Assist First Line Supervisors with accident investigations and direct that appropriate corrective actions are taken immediately.
6. Require subcontractors and their personnel to comply with safety set forth by the Safety Director.

### **FOREMAN:**

1. Plan and execute all work in compliance with safety policies and procedures.
2. Know and enforce safety regulations applicable to company operations.
3. Enforce use of required safety devices and personal protective equipment.
4. Train employees in job safety and health requirements.
5. Assure that injuries are treated properly and reported promptly.
6. Investigate all accidents and complete required reports.
7. Correct unsafe conditions and work practices when observed. Seek assistance from superintendent if required.

### **EMPLOYEE:**

1. Comply with all safety regulations and policies.
2. Report all accidents and injuries to supervisor immediately.
3. Report unsafe conditions and work practices to supervisor.
4. Use required safety devices and personal protective equipment.
5. Maintain tools and equipment in good repair.
6. Maintain clean and orderly work areas.
7. Ask for additional guidance if unsure how to perform a job in a safe manner.



## **II. ANALYSIS OF ACCIDENTS**

Shenandoah Steel will periodically complete documented evaluations of all reported accidents, incidents and identified hazards (at least annually). The primary source of data for this analysis will be information provided on the "Supervisors Investigation of Accident" report, completed safety inspection reports, the OSHA 200 Logs, any other incident report of equipment damage or "near miss" incidents, or reports provided by the insurance loss control representative.

Shenandoah Steel will analyze this data for corrective actions proposed and follow-up actions taken. The principal source of accidents will be identified and located by determining the machines, tools and materials most frequently involved in accidents and operations most likely to produce injury. This analysis should highlight:

1. Nature and size of accident problem by specific operation
2. Principal hazard associated with various equipment
3. Inefficiencies in operating procedures from:
  - a. Outdated work methods
  - b. Exceeding physical capabilities of workers
  - c. Lack of proper equipment
  - d. Unsafe practices requiring additional training

A report will be provided to Shenandoah Steel this analysis annually. Management will initiate prompt corrective actions to reduce the exposure to employees.

### **III.**

### **ACCIDENT RECORD SYSTEM**

#### **SAFETY RECORDS:**

Shenandoah Steel is responsible for maintaining records that will reflect the successes and/or weak areas of the company's accident prevention program. The following files will be maintained:

- Initial employee training records.
- Safety meeting records.
- Internal inspection reports.
- Accident logs.
- Accident investigation reports.
- Safety audits performed by outside agencies.
- Records of safety equipment ordered/received.
- Fire drills.

Shenandoah Steel will review these records at least annually to determine if corrections and/or additions to the company accident prevention plan are required.

All safety records will be maintained for a minimum of five years after the effective year.

## IV.

### **SAFETY TRAINING**

An effective accident prevention program requires proper job performance from everyone in the workplace. No matter how much our company stresses safety on the job, the safety of our employees depends largely upon their own conduct. For this reason, much effort in Shenandoah Steel's safety program is directed toward education and influencing workers.

**EMPLOYEES:** The training of the employee will begin the day he goes to work. On each jobsite the project SUPERINTENDENT will give an initial orientation to each new employee using the "Guide for New Employee Safety Indoctrination" before the employee begins his first work assignment. The orientation will be documented on the "Safety Orientation Report" which will be forwarded to Bonnie Mendelson, owner for filing.

**SUPERVISORS:** In order to carry out their responsibilities for accident prevention, supervisors should have knowledge of basic safety. This will be accomplished by careful and repeated reading of OSHA regulations, industry safety manuals and other available safety literature. Supervisors will be scheduled to attend seminars, workshops, etc., conducted by outside organizations when such training will benefit Shenandoah Steel's operations.

**SAFETY MEETINGS:** All employees will attend a weekly safety meeting. These meetings will be conducted on each project by the PROJECT SUPERINTENDENT and will be documented by using the "Safety Meeting" form and sent to Bonnie Mendelson for filing.

**ANNUAL TRAINING:** Bonnie Mendelson will conduct and document annual training on the following subjects:

- Hazard communication program.
- Hydrogen sulfide procedures.
- Lockout/tagout program.
- Back injury prevention.

**SPECIAL TRAINING:** Bonnie Mendelson will conduct and document training in the following areas as the need arises:

- New tools and equipment.
- Changes in work procedures.
- New hazards identified at work sites.
- Changes and/or additions to safety rules.



# SHENANDOAH STEEL, L.P

## WEEKLY SAFETY MEETING

Project Name: \_\_\_\_\_

Foreman: \_\_\_\_\_

Date: \_\_\_\_\_

Weekly topic: \_\_\_\_\_

Outline: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Topics discussed related to this project and your job assignment:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Employees in attendance:

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

## **GUIDE FOR NEW EMPLOYEE SAFETY INDOCTRINATION**

Supervisors should always remember that for a new employee, the first few weeks on the job carry the highest potential of injury. The chance of an accident is greatly reduced when new employees are made aware of the “safe way” at the beginning of their employment.

1. **GENERAL DISCUSSION OF SAFETY DEVICES** Explain the purpose and operation of some of the safety devices in use such as safety switches and equipment starting and stopping without your being present and that he/she is not to operate the equipment without the safety devices.
2. **REPORTING OF INJURIES** Stress the importance of employees reporting even the slightest injury so that you can arrange for proper treatment. Show him/her the location of First Aid equipment, etc. in the operating area.
3. **SAFETY RULES FOR SPECIFIC JOB** Explain all the safety rules and procedures for the specific job to which the employee is assigned. This shall include the following:
  - a. The purpose of safety devices such as guards, lockouts, interlocks, emergency equipment, etc., in the operation areas.
  - b. Show the proper methods of handling material. Explain the need to obtain help for large, bulky or heavy items.
  - c. Explain the purpose of all hand tools used for the job. Point out the need for keeping them in good condition.
  - d. Explain any special hazards that exist on the job, such as vapors, acid, dust, caustic, electrical hazards and pinch point hazards.
4. **REPORTING UNSAFE EQUIPMENT OR CONDITIONS** Encourage the employee to report to you when his equipment or machine is not functioning properly or when there is an existing condition that jeopardizes his safety.
5. **HOUSEKEEPING** Explain the effect that housekeeping has on efficient operations and the employees safety. Show him/her the proper method of handling refuse and trash. Explain the method of disposing of rags in a proper manner. Encourage the new employee to use the proper trash containers. Show the employee the conditions that create poor housekeeping or can contribute to the problem.

- 6, **PROTECTIVE EQUIPMENT**
  - a. Safety Glasses - Discuss the importance and necessity of wearing eye protection on the job. Explain some jobs require more than standard eye protection. For those jobs the specialized equipment will be provided.
  - b. Safety Shoes - Emphasize if they are required.
  - c. Any special protective equipment.
- 7, **ON THE JOB CONDUCT** Explain the effect that his/her job has on the safety of others, stressing particularly the matter of horseplay. Instruct him/her as to the danger of attempting to run a machine or piece of equipment the employee has not been trained on. Point out that most accidents are partly the result of some unsafe act by the employee. Explain that if the employee conducts himself/herself according to your instructions a safe operation will result.
8. **EMERGENCY PROCEDURES EVACUATION** Explain the signal system and the individual's requirements to shut down machinery and equipment. Explain the need of keeping a cool head and evacuating by the proper exit.
9. **MATERIAL HANDLING** Demonstrate the proper method of handling materials. Explain the need of using leg muscles to lift. Show the employee that it is easier to lift objects if they are kept close to the body.
10. **FOLLOW-UP** Check back and observe the employee several times to make sure that he/she is following your instructions. **MAKE SURE THE EMPLOYEE IS DOING** the job the safe way. Correct any and all variations from your instructions immediately, unless the method being used by employee results in an even greater degree of efficiency and safety than your original instruction.

## **SAFETY ORIENTATION REPORT**

<b>TOPIC</b>	<b>SUPERVISOR'S INITIALS</b> ↓	<b>EMPLOYEE'S INITIALS</b> ↓	<b>DATE COMPLETE</b> ↓
GENERAL SAFETY DEVICES	_____	_____	_____
ACCIDENT REPORTING PROCEDURES	_____	_____	_____
SAFETY RULES FOR SPECIFIC JOBS	_____	_____	_____
MATERIAL HANDLING	_____	_____	_____
PROTECTIVE EQUIPMENT	_____	_____	_____
CONDUCT ON JOB	_____	_____	_____
REPORTING UNSAFE EQUIPMENT OR CONDITIONS	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____



## **MEDICAL AND FIRST AID SYSTEMS**

### **1. PLACEMENT EXAMINATION**

A physical examination by a physician may be required of all applicants who are given an offer of employment, prior to the start of actual employment. The offer of employment will be based upon an applicant's ability to perform the mental and physical requirements of essential written job functions with or without reasonable accommodations in accordance with the Americans with Disabilities Act Title I, Sec. 101 (9) and 29 CFR 1630.2 (O). The physical examination will be made to verify an applicant's ability to perform essential written job functions.

The results of the examination will be maintained separately as confidential records. Supervisors may be informed as to work restrictions and reasonable accommodation. First aid and safety personnel may be informed if a physical condition requires emergency treatment. Government officials may be informed upon their request if investigating compliance with the Americans with Disabilities Act.

### **2. FIRST AID SERVICES**

Each crew will have at least one individual properly trained in first aid. The training will be conducted by a certified individual and a record of the training will be maintained. Refresher training will be conducted at recommended intervals. Information pertaining to medical care available near work sites will be provided to all employees and maintained at job sites.

First aid supplies will be maintained at each work site for the duration of the job. Supplies needed shall be verified by a doctor familiar with the work performed.

Each employee will receive a general review of emergency first aid procedures:

**SERIOUS BLEEDING** - Apply direct pressure to the wound with the bare hand if necessary. Wrap wound with gauze or clean cloth and continue to apply pressure on the wound, apply finger or hand pressure to the artery supplying blood to the wound. If hand or finger pressure on an artery will not stop severe bleeding, a tourniquet may be used. The important thing is to stop the severe bleeding to save a life.

Due to blood born pathogens (i.e. AIDS), you may want to consider the use of latex gloves (available in first aid kit) whenever you are administering aid to a bleeding victim.

**SNAKE BITE** - Transport the victim to a doctor or hospital as quickly and safely as possible (a wrecked vehicle does the victim no good). Keep the victim quiet and tell him to calm down: a quickly pounding heart tend to spread the venom in the body. Keep the bitten area below the heart: the venom pre-digests muscle and the heart is a muscle. Keep the bitten area parallel to the ground if possible: the venom tends to follow gravity. If possible, place rubber bands or something similar above and below the bitten area (2 to 4 inches) to localize the venom. If only one restraint is available, place it between the bitten area and the heart. Place ice or chilled drink cans or cold water around the bitten area: this slows down the action of the venom.

Do not make cuts in the bitten area or attempt to suck out the venom. This is a waste of time and does not work. The human mouth is more prone to cause a serious infection than the mouth of a snake (also, the snake may have injected no venom). Treat the victim for shock and provide artificial respiration if needed.

Telephone or radio ahead to the nearest doctor or hospital so the proper treatment can be made available.

**ARTIFICIAL RESPIRATION** – Remember that seconds count: the brain needs oxygen and will suffer damage if kept without it for just a few minutes. Put the victim on his back. Tilt the head back and lift the neck at the same time. Remove any objects from the mouth. Pinch the nose to close the nostrils so air will not escape through the nose. Make a seal around the victim's mouth with your mouth and exhale forcefully until the victim's chest rises (If the victim's stomach rises, push down on the stomach so the air goes into the victim's lungs). A first aid ventilator designed for this purpose can also be used if available. Exhale into the victim at the rate of 12 times per minute without stopping. Phone or radio for a doctor or hospital.

**SHOCK** – This is a serious condition where the body's systems are starting to fail due to a drop in blood pressure as the result of serious injury, pain, burns, or blood loss. Death will result if the body's systems fail completely.

Look for a pale face, a pulse that is quick but not strong (low fluid pressure). Breathing that is not regular, skin that is cool and damp to the touch, and partial or total unconsciousness. Also, the victim may become nauseous and vomit.

Keeping the victim warm is the most important first aid for shock. Cover the victim with blankets or warm clothing (even on a hot day). After he has been laid down with the head lower than the rest of the body (the feet can be raised), remove any objects in the mouth. Loosen any tight clothing (can restrict blood flow). Give no liquids to the victim if unconscious. Allow the victim plenty of air.

**ELECTRICAL SHOCK** – Shut off power and remove victim. Administer CPR if victim is not breathing and there is no pulse. Apply first aid for burns if present. Treat for shock. Get victim to medical attention.

**FRACTURES** – These are broken bones, either simple or compound. A compound fracture is a broken bone that has penetrated the skin.

Call or radio for a doctor or an ambulance as soon as possible. Do not: attempt to set a broken bone. Do not transport a victim before splints have been applied, even for a short distance, unless it is absolutely necessary. Control the bleeding first in a compound fracture and treat the wound. Use padded splints for compound fractures.

**BURNS** – Put liberal amounts of cold water on the burned area or submerge the area in cold water if possible. The cold water will take the excess heat out of the burned flesh and halt further damage deeper into the body in the burned area. Keep the area clean by covering it with a clean dressing. Medical care will be necessary for burns which are not minor.

**FIRST DEGREE BURN** – Redness of the skin.

**SECOND DEGREE BURN** – Blistering.

**THIRD DEGREE BURN** – Charring of the skin. (Excess heat remains in lower skin levels and body. The flesh is continuing to be cooked. It is very important to get cold water on the burned area to stop this. The nerves in the outer layer of skin are generally gone, so there is little or no pain).

**CHEMICAL BURNS** – Follow the first aid procedures described on the Material Safety Data Sheet for the chemical causing the burn. MSDS's will be reviewed regularly for this purpose.

**TRANSPORTATION OF THE VICTIM** – With a serious injury, an immediate decision must be made about proper transportation.

**Questions to Consider:**

Is it possible to protect and immobilize the victim's injury so that further injury will not occur during transport?

Would it be better to keep the victim calm, as comfortable as possible, and with the injury immobilized while waiting for an ambulance?

Shenandoah Steel's management will be notified immediately to assist field personnel in making this decision.

## **HEATSTROKE/SUNSTROKE**

### **THE VICTIM:**

Is Weak                      Is Irritable  
Is Dazed                     Is Nauseated  
Quits Sweating          Has Hot and Dry Skin  
Has a High Temperature – 105 Degrees F or more (not enough water in the body to control heat – Danger to the brain and life).  
May be unconscious.

### **What YOU Should Do:**

Cool victim off as quickly as possible! Place him in any shade available and wrap his head with wet cloths. Pour water on him and/or wrap his body with wet cloths. Give him cool water to drink (or cool sodas). Put him in an air conditioned cab if one is available. Massage legs toward the heart.

Call an ambulance or get him to emergency medical care.

## **HEAT EXHAUSTION** – Caused by loss of salt from the body

### **THE VICTIM:**

Has a pale face              Has moist and cool skin  
Sweats a lot                 Has a weak pulse/heartbeat  
Has a low temperature  
May slip in and out of unconsciousness

### **What YOU Should Do:**

Put the victim down in moving air.  
Put the head level with or a little lower than the body.

## **3. PERIODIC HEALTH EXAMINATION:**

It will be Shenandoah Steel's company policy that employees may be subject to periodic physical examinations to verify their ability to continue to perform essential job functions.

## **4. CONTROLLED SUBSTANCE ABUSE POLICY**

A copy of the drug policy will be provided in writing to each employee. The policy contains a purpose statement, a statement defining controlled substances on company premises, a statement concerning when testing will be utilized, a statement of disciplinary action for violations of the policy, a statement concerning counseling and rehabilitation, and an employee consent agreement.

## **V. MAINTENANCE OF SAFE WORKING CONDITIONS**

Accidents are caused by unsafe conditions and/or unsafe work practices. Safety inspections of shops and work sites are one of the principal means of locating potential accident causes. They assist in determining what actions should be taken to eliminate or reduce potential exposures before accidents and injuries occur.

It is Shenandoah Steel's company policy that each jobsite supervisor will perform a safety inspection of his jobsite during the first week of each month. The attached "Job Safety Inspection Check List" will be used during the inspection. The supervisor will keep a copy of the completed check list and will enter the date and corrective actions taken to correct the unsafe conditions. If the supervisor cannot correct the conditions, a copy of the completed check list will be forwarded to the higher management level that can take corrective action.

Supervisors will make a visual inspection of each new work site to detect unsafe conditions prior to beginning work at the site. The "Job Safety Inspection Check List" can also be used to perform this survey of the work site. Hazards will be corrected when possible. If hazards cannot be corrected or reduced, workers will be informed of the hazards and given instructions for working in the environment.

### **SAFETY RULES**

In order for an accident prevention plan to be successful, it is essential that rules be developed and enforced. The rules must be understood and followed by all employees, and managers/supervisors must enforce the rules as part of their duties.

Bonnie Mendelson is responsible for reviewing the rules at least annually to determine if the list should be changed because of changes in facilities, equipment, work procedures, etc.

Since it is not possible to publish a rule that will cover every circumstance that may arise, employees are expected to use common sense and to ask for guidance from supervisors prior to performing a task with which they are not familiar.

Employees are required to know and comply with the following general rules. They will sign a statement that the rules have been read and are understood. Additional safety rules for specific operations are listed elsewhere under "Specific Operations". Violations of the rules may be cause for immediate disciplinary action, to include termination.

**JOB SAFETY INSPECTION CHECK LIST**

**JOB NAME:** \_\_\_\_\_ **JOB #:** \_\_\_\_\_  
**FOREMAN:** \_\_\_\_\_  
**DATE:** \_\_\_\_\_ **TIME:** \_\_\_\_\_ am/pm  
**AREA OR WORK:** \_\_\_\_\_

Unsatisfactory\_\_\_\_ Satisfactory\_\_\_\_

**1. PERSONAL PROTECTIVE EQUIPMENT**

- \_\_\_ Hard Hats
- \_\_\_ Work Boots
- \_\_\_ Shirt w/sleeves
- \_\_\_ Wearing of gloves while handling materials
- \_\_\_ Use of safety glasses while cutting/welding/drilling/grinding
- \_\_\_ Use of lanyards for fall protection
- \_\_\_ Safety vests

Comments: \_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**2. EQUIPMENT AND TOOLS**

- \_\_\_ Extension cords with ground
- \_\_\_ Drill gas/electric
- \_\_\_ Winches on jacks
- \_\_\_ Cable on jacks
- \_\_\_ Column horses
- \_\_\_ Welding leads, stingers
- \_\_\_ Welding hood
- \_\_\_ Sledgehammer
- \_\_\_ Gauges for torch
- \_\_\_ Tip on torch
- \_\_\_ Safety chain for steel unloading
- \_\_\_ Generator
- \_\_\_ Stressing ram

Comments: \_\_\_\_\_  
\_\_\_\_\_

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**3. CONTAINERS**

- Water can
- Safety gas can
- Safe storage/handling of gas cylinders

Comments: \_\_\_\_\_

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**4. PROPER LIFTING TECHNIQUES**

- Bending and lifting properly while handling materials
- Moving in a forward direction (distributing iron, working)
- Load evenly distributed among all
- Working entanglements out before attempting to lift steel
- Bundle wire removed from steel prior to lifting
- Weight of steel carried per man 70 lbs or below
- Safety vests

Comments: \_\_\_\_\_

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**5. WALKWAYS**

- Openings secured or covered
- Ladders correctly installed
- Handrail or other safety device up to prevent falls
- Pathways clear of trip hazards
- Working surface oil, mud, water, moisture
- Access to work are (ramp, stairway, etc.)
- Swing radius

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**6. RIGGING, HOISTING AND UNLOADING MATERIAL**

- \_\_\_ Proper rigging for the weight of load
- \_\_\_ Rigging in good condition
- \_\_\_ No one passing under suspended loads
- \_\_\_ No hoisting of suspended loads over people's heads
- \_\_\_ Clear and proper signals being used
- \_\_\_ Safety chains used for unloading paving steel
- \_\_\_ Dunnage and/or loose iron removed from steel truck prior to unloading

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**7. TRANSPORTATION**

- \_\_\_ Men riding in back of truck properly seated
- \_\_\_ First-Aid kit
- \_\_\_ Hazard Communication Policy

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**8. MISCELLANEOUS**

- \_\_\_ Using double wire to secure bottom steel
- \_\_\_ Using bridge to span wide beams walking and carrying material
- \_\_\_ Impalement of dowel rod

- \_\_\_
- \_\_\_
- \_\_\_
- \_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



**9. EXCAVATION AND SHORING**

- Banks shored or sloped
- Open areas barricaded
- Ladders or walkway provided where needed

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**10. HOUSEKEEPING**

- General appearance neat and orderly
- Walkways clear
- Projecting nails removed from lumber

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**SPECIAL NEEDS:**

**REPORTED BY:** \_\_\_\_\_

## **GENERAL SAFETY RULES**

1. Report any accident, no matter how minor, that results in personal injury or property damage. Get medical attention promptly.
2. Obey all company rules, government regulation, signs, markings and instructions. Be particularly familiar with those that apply to you.
3. Report immediately any conditions or work practices that you think might cause either personal injury or damage to equipment. Use the right tools and equipment for the job.
4. Do not operate any equipment that you are not qualified to operate or which, in your opinion, is not safe to operate.
5. Use all required safety devices and personal protective equipment.
6. Do not engage in horseplay; avoid distracting others; be courteous.
7. When lifting, use correct procedure – check the load; bend your knees; grasp the load firmly; keep your back as straight as possible; lift smoothly with your legs. Change direction by turning your whole body – do not twist. Get help if the load is too heavy or too awkward.
8. Practice good housekeeping at all times. Return all tools, equipment, materials, etc., to their proper place.
9. Working under the influence of drugs and/or alcohol is strictly prohibited. Report the use of prescription drugs to your supervisor.
10. Ask you supervisor for instructions if you are unsure how to perform a job safely.
11. Scuffling, running or throwing objects is prohibited.
12. Safety goggles must be worn on jobs specified by your supervisor.
13. Safety hard hats, approved work boots in good repair and leather gloves must be worn by individuals as directed be your supervisor.
14. All accidents and/or injuries must be reported to the Supervisor immediately.
15. Failure to report any accident will result in disciplinary action.
16. Keep water / electricity apart. Shock danger. Keep hands dry and prevent dampness near electrical equipment.
17. Warning signs help you prevent incidents. Obey them. Remind others, also.

18. Proper footwear, which protects the wearer from abrasions and twists, must be worn at all times.
19. Protective goggles must be worn at all times when using a torch or grinder.
20. Always stay clear of suspended loads. Never work or pass below them. Never hoist materials that will pass over others.
21. Examine all slings, chains and chokers for defects before using. If defect are encountered, turn the defective item over to your supervisor.
22. Examine you own pliers before use each day to confirm their ability to grip and hold wire without slipping.
23. Inspect your personal gear before use to insure it is functional.
24. When working on a wall, insure that your wall safety hook has a functioning safety catch and is the appropriate size for the iron you are working on.
25. When directing a load, always remain in clear view of the operator. Always communicate with your fellow workers before directing the load. Always make clear and proper hand signals.
26. Proper rigging must be used when hoisting materials.
27. Never jerk, snatch or yank when trying to handle materials. Always use smoothly applied force that is well within your personal physical ability. If materials are twisted together, take the time to work those materials out of their entanglements so as not to do harm to yourself or others.
28. Always inspect jacks/winches/column horses before using them. See that they are in proper working condition. Any defects should be brought to the attention of your supervisor.
29. When carrying lifting material with others, be sure that the load is evenly distributed between all.
30. Do not engage in work other than that which you have been trained and instructed to do by you supervisor.
31. If it is necessary to ride in the back of a pickup truck, remain seated on the floor with your back against either the sides or the cab. Never sit with your back to the rear of the truck bed or up on the side rails.
32. Always be aware of overhead hazards on the job, such as power lines, signs, etc.
33. Fall protection must be used when working above six (6') feet off the ground.
34. All equipment must be operated only by those trained and authorized to do so.

35. Before starting work, it is necessary to survey your work area and identify any work hazards which may cause injury of property.
36. Caution must be used when working around heavy equipment. Constant monitoring of their movements will insure you do not cross paths with them.
37. Always walk or move in the direction you are facing. Moving backwards endangers you and others, especially when distributing iron.
38. Before unloading steel, examine the truck for shifted loads, loose iron or dunnage which could endanger you or others during unloading. If danger exists, correct it prior to unloading.
39. Gloves are to be worn at all times when handling iron.
40. Riding the ball is strictly prohibited. Riding in a basket not approved for the hoisting of personnel is prohibited.
41. Be aware of your footing. Mud, oil, ice, wet surfaces and other conditions which rob you of secure footing must be avoided and/or corrected.
42. Never work or walk with you back against traffic. When working with others always be aware of their locations to ensure that your activities do not endanger them or that their activities endanger you.
43. Never work on an elevated deck which does not have secure railing around the work area, to prevent falls. In addition, never work on an elevated deck that has openings which are not securely covered.
44. Proper warm-up activity must be done before attempting any heavy lifting and/or other strenuous work.
45. Horse play is NOT allowed. Practical jokes can cause serious injury.
46. An accident hurts each of us, all of us. An accident does not just happen. It is caused by not following safety procedures.
47. Keep safety in your work every day. It will become habit...and that's no accident!

### **DRESS CODE**

For your safety, full-length pants must be worn at work to protect your legs from cuts and abrasions. Shirts with sleeves that cover the entire shoulder area are also necessary to protect your upper body. Adequate work shoes which prevent abrasions, twists and punctures are also required.

### **HAZARDOUS MATERIALS**

Any employee who has a complaint or feels that they are being exposed to hazardous materials or feels that they are working in an unsafe environment may contact the management so that the company may answer questions or correct any problems in your work area.

## **PREVENTING BACK INJURIES**

The leading types of employee injury in the workplace are sprains and strains of the lower back. In fact, it is estimated that eight out of every ten people will at some time suffer back injuries or problems. Lifting, moving materials or equipment, and other work-related activities, if done incorrectly, increases the potential for an injury. The basic steps listed below will help reduce the possibility of a disabling injury.

1. Review work tasks. If the work requires continuous lifting or moving of material, proper training and good physical condition will minimize injuries.
2. Inspect work areas. Wet or slippery surfaces, poor conditions and improperly maintained stairs or walking surfaces increase the chances of an injury.
3. Use mechanical lifting devices. Lifting capabilities vary by individual; potential for injury increases as the weight of the object to be moved increases. The use of lifting devices should be used whenever possible.
4. When moving items, grasp the load firmly. Do not jerk the load; keep it close to your body. Lifting with your legs is usually the best method. However, as part of orientation training, the program will give more thorough information on the use of body mechanics. A Physical Therapist is also a good resource person to contact to help in this area.
5. Make sure adequate help is available to move heavy or awkward items. Employees should not try to move heavy objects by themselves. Getting assistance takes very little extra time and can eliminate the threat of a serious injury.

Date: \_\_\_\_\_

Project: \_\_\_\_\_

I, \_\_\_\_\_ certify that I have received written information and training from Shenandoah Steel concerning an ongoing safety program and policy.

I further understand that it is my responsibility to attend all safety meetings and to familiarize myself and comply with the written safety program and policy of Shenandoah Steel, L.P.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

## **VI. ACCIDENT INVESTIGATION**

Primary emphasis is placed on preventing accidents. However, an accident may still occur and we should learn from the event so that actions can be taken to prevent recurrence.

Supervisors will report all accidents to Bonnie Mendelson as they occur. In addition, they will investigate any accident that results in personal injury and/or property damage. The investigation will be completed within three working days of the accident using the attached "Supervisor's Investigation of Accident" form. A copy of the completed form will be sent to Bonnie Mendelson within five working days after the date of the accident. Bonnie Mendelson will review the report to determine if corrective actions are adequate, or if additional measures should be taken to prevent recurrence. This could include recommending disciplinary procedures if warranted.

Included in this section are some aids that can assist investigators in performing a thorough accident investigation. These consist of instructions for completing the investigation form and a guide for asking pertinent questions during the investigation.







## ACCIDENT INVESTIGATION QUESTION GUIDE

OPERATING FACTORS	MANAGEMENT CONTROLS	QUESTIONING GUIDE
P E O P L E	<p style="text-align: center;">PLACEMENT</p>   <p style="text-align: center;">TRAINING</p> <p style="text-align: center;">ENFORCEMENT MOTIVATION</p>	<p><b>WHO WAS INVOLVED?</b>            What qualifications are necessary to perform the task?            Who is most qualified?            Why was this employee selected if not most qualified?</p> <p>What instructions or training were provided?            What additional training is needed?</p> <p>What instructions or rules were not followed?            What additional rules or enforcement action should be established?            What positive measures have been taken to promote correct behavior?            What additional measures are necessary?</p>
E Q U I P M E N T	<p style="text-align: center;">DESIGN AND ARRANGEMENT</p>   <p style="text-align: center;">PURCHASING</p>   <p style="text-align: center;">MAINTENANCE</p>   <p style="text-align: center;">PERSONAL PROTECTIVE EQUIPMENT</p>	<p><b>WHAT EQUIPMENT WAS INVOLVED?</b>            Why was this equipment used? What equipment should be used?            What guards were or were not used?            What arrangement problems were present?            What additional design/arrangement controls were necessary?</p> <p>How did the quality or hazards of equipment contribute to loss?            What additional purchasing controls are needed?</p> <p>What maintenance problems were evident?            When should maintenance be performed?            How can maintenance be improved?</p> <p>What Personal Protective Equipment is provided?            When should PPE be used?            What PPE should be provided?</p>
M A T E R I A L	<p style="text-align: center;">DESIGN AND ARRANGEMENT</p>   <p style="text-align: center;">PURCHASING</p>	<p><b>WHAT MATERIAL WAS INVOLVED?</b>            What design characteristics contributed to the loss?            How should material be designed?            How was the material arranged, handled and used?            How should the material be arranged, handled and used?            Where should the material be arranged?</p> <p>Why was the material being used?            What material should be used?</p>
E N V I R O N M E N T	<p style="text-align: center;">DESIGN AND ARRANGEMENT</p>   <p style="text-align: center;">PURCHASING</p>   <p style="text-align: center;">HOUSEKEEPING</p>   <p style="text-align: center;">MAINTENANCE</p>	<p><b>WHAT ENVIRONMENTAL FACTORS WERE INVOLVED?</b>  <b>(BUILDING NOISE, VAPOR, ILLUMINATION, WEATHER, ETC.)</b>            Why was it designed and arranged this way?            How should it be designed and arranged?</p> <p>What purchasing controls are necessary?</p> <p>When should housekeeping be performed?            How should housekeeping be improved?</p> <p>What maintenance problems are evident?            When should maintenance be performed?            How should maintenance be improved?</p>

Task & Activity at Time of Accident	A. General Type of Task _____ B. Specific Activity _____ C. Employee was working <input type="checkbox"/> Alone <input type="checkbox"/> With crew or fellow worker <input type="checkbox"/> Other
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Posture of Employee:
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Supervision at Time of Accident	<input type="checkbox"/> Directly Supervised	<input type="checkbox"/> Indirectly supervised	<input type="checkbox"/> Not supervised	<input type="checkbox"/> Not feasible
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**CASUAL FACTORS:** Events and conditions that contributed to the accident, include those identified by use of the Guide for Identifying Casual Factors and Corrective Actions:

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**CORRECTIVE ACTIONS:** Those that have been, or will be, taken to prevent recurring includes those identified by use of the Guide for Identifying Casual Factors and Corrective Actions.

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Prepared By:	Title:	Date:
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Prepared By:	Title:	Date:
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Prepared By:	Title:	Date:
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## **INSTRUCTIONS FOR USE OF** **“ACCIDENT INVESTIGATION REPORT”**

This form is not a report to the insurance carrier. It is to be used as a guide to more thorough investigation and study of accident causes. It will be completed for every accident resulting in personal injury and/or property damage. The steps necessary in investigating an accident and filling out the form are:

1. Discuss the accident with the injured employee and with witnesses.
2. Inspect the equipment or materials involved for conditions that can be made safer.
3. Study the job set-up and manner of doing the work. Could it be improved?
4. Decide what acts, conditions or circumstances caused or permitted the accident, and describe them in the report. Do not use the term “carelessness”; it is too indefinite. Try to substitute “lack of skill”, “lack of knowledge of hazards”, “not instructed”, “disobeyed instructions”, etc. These are things about which something can be done.
5. Suggest some action by management or supervision to prevent similar accidents in the future. Assume the attitude that all accidents are simply the result of mistakes or errors and that it is the supervisor’s job to prevent such things as much as possible.
6. Prepare your report and turn it in to the person who is designated by your management.

The file of accumulated reports should be studied frequently by persons responsible for the over-all accident prevention program. Managers should make free use of these reports in conducting safety discussions with employees.

When preventive measures are suggested on a report, it should be referred to the person with authority to take action and should be given prompt attention.

## ACCIDENT INVESTIGATION REPORT

# SHENANDOAH STEEL, L.P.

Name of Injured:		S.S. No:	
Sex:	Age:	Date of Accident:	
Home Address:			
Employee's Usual Occupation:		Occupation at Time of Accident:	
Length of employment: <input type="checkbox"/> Less than 1 mo. <input type="checkbox"/> 1-5 mos. <input type="checkbox"/> 6 mos. To 5 yrs. <input type="checkbox"/> More than 5 years			
Time in Occupation at Time of Accident: <input type="checkbox"/> Less than 1 mo. <input type="checkbox"/> 1-5 mos. <input type="checkbox"/> 6 mos. To 5 yrs. <input type="checkbox"/> More than 5 years			
Employment Category: <input type="checkbox"/> Regular, full-time <input type="checkbox"/> Regular, part-time <input type="checkbox"/> Temporary <input type="checkbox"/> Seasonal <input type="checkbox"/> Non-employee			
Case Numbers & Names of Others Injured in Same Accident:			
Nature of Injury & Part of Body:			
Name & Address of Physician:			
Name & Address of Hospital:			
Time of Injury:		A.M. / P.M. (Circle One)	
Severity of Injury: <input type="checkbox"/> Fatality <input type="checkbox"/> Lost workdays <input type="checkbox"/> Medical treatment <input type="checkbox"/> First-Aid <input type="checkbox"/> Other: specify			
Specific Location of Accident:		Employer's Premises? Yes - No	
Phase of Employee's Workday at Time of Injury: <input type="checkbox"/> During rest period <input type="checkbox"/> During meal period <input type="checkbox"/> Working overtime			
<input type="checkbox"/> Entering or leaving plant <input type="checkbox"/> Performing work duties <input type="checkbox"/> Other			
Describe How the Accident Occurred:			
Accident sequence - Describe in reverse order of occurrence events preceding the injury & accident. Starting with the injury & moving backward in time, reconstruct the sequence of events that led to the injury.			
A. Injury Event _____			
B. Accident Event _____			
C. Preceding Event #1 _____			
D. Preceding Event #2, #3, etc. _____			

## VII.

### **SAFETY PROGRAM REVIEW/REVISION**

Bonnie Mendelson will review the entire Safety Program annually to determine if there are any revisions necessary to address exposures within current operations. Areas that will be carefully evaluated include: operations added, equipment added/changed, changes in environmental conditions, adequacy of personal protective equipment, etc. Procedures should be reviewed to make sure they are still applicable.

In the event that changes in the Safety Program are made, all employees will be informed in writing of these changes and provided additional safety training and instructions as needed. All changes will be documented by date on the "Safety Program Review" form and denoted by a (\*) at the location of change in the program documentation.

### **ACCOUNTABILITY OF EMPLOYEES**

Each employee will receive a copy of the safety policy and the safety rules which apply to his/her particular job. A signed receipt acknowledging this, and that the policy and rules are understood will be required of each employee. The signed receipt will be maintained in each employee's personnel file.

The safety rules are safe operational procedures which are meant to help prevent injuries to all employees.

Failure to follow the safety rules will result in disciplinary action which will be documented and maintained in personnel files. Repeated disregard of safe operational procedures will be cause for termination.

I have read, received and understand the "Accident Prevention Plan" instructions, and will do my best to observe them at all times. For future reference, this signature page will serve as official acknowledgment of the "Accident Prevention Plan" and will be placed in employee's file.

I understand that failure to observe these rules will result in disciplinary action or termination of employment.

\_\_\_\_\_  
Signed (Employee's Signature)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Supervisor

## **VIII.**

### **DRUG AND ALCOHOL POLICIES**

#### **PURPOSE:**

The purpose of this policy is to identify and remove the adverse affects of alcohol, drugs and weapons on job performance, and to protect the health and safety of our employees by providing education and treatment.

Use and misuse of alcohol or drugs can and does impair the ability of an employee to perform his/her duties and may endanger the employee, his/her coworkers, and the public as well as property. The company seeks to prevent the use/abuse/misuse of drugs. Alcohol and weapons by employees in any way which impairs their ability to perform their duties

#### **DRUGS, ALCOHOL AND WEAPONS POLICY**

To further the goal of providing a safe work environment for Shenandoah Steel employees, the possession, use or distribution of Prohibited Substances is no permitted. Prohibited Substances include, but are not limited to, alcoholic beverages, inhalants, narcotics, illegal drugs, simulated "look alike" drugs, drug paraphernalia, and prescription drugs which may adversely affect working ability. Employees are not permitted to work when alcohol or other Prohibited Substances are present in their system. No firearms, unauthorized explosives or weapons of any kind are allowed on company premises. Entry into company premises is conditioned on the company's right to search the person, personal effects, and vehicles of any entrant for Prohibited Substances, Firearms, Explosives, and Weapons. These searches may involve the use of electronic detection devices, scent trained dogs, or any other search method deemed appropriate by Shenandoah Steel.

Any employee who fails to abide by the above rules and/or who refuses to submit to a search or drug test will not be allowed to work on any Shenandoah Steel project.

#### **POLICY:**

1. The company shall implement a comprehensive drug and alcohol abuse education program. As part of that program, information will be provided on the availability of employee assistance program services.

2. Alcoholism and other drug addictions are recognized as diseases responsive to proper treatment, and this will be an option as long as the employee cooperates. Employee assistance program (EAP) will be made available to assist employees.
3. The manufacture, distribution, dispensing, possession, sale, purchase, or use of a controlled substance on company property is prohibited.
4. Being under the influence of alcohol or illegal drugs on company property is prohibited. The unauthorized use or possession of prescription drugs or over-the-counter drugs on company property is prohibited.
5. Employees who violate this policy are subject to appropriate disciplinary action including termination.
6. The policy applies to all employees of the company regardless of rank or position and includes temporary and part-time employees.

**DEFINITIONS:**

- A. Company Premises – All company property including vehicles, lockers, and parking lots.
- B. Company Property – All company owned or leased property used by employees such as vehicles, lockers, desks, closets, etc.
- C. Controlled Substance – Any substance listed in Schedules I-V of section 202 or the Controlled Substance Act (21 U.S.C. S 812), as amended. Copies are maintained for employee review by Personnel and Health Services.
- D. Drug – A drug is any chemical substance that produces a physical, mental, emotional or behavioral change in the user.
- E. Drug Paraphernalia – Equipment, a project or material that is used or intended for use in concealing an illegal drug or for use in injecting, ingesting, inhaling or otherwise introducing into the human body an illegal drug or controlled substance.
- F. Fitness for Duty – To work in a manner suitable for the job. To determine “fitness” a medical evaluation may include drug and/or alcohol testing.



- G. Illegal Drug – An illegal drug is any drug or derivative thereof which the use, possession, sale, transfer, attempted sale or transfer, manufacture or storage of is illegal or regulated under any federal, state, or local law or regulation and any other drug, including (but not limited to) a prescription drug, used for any reason other than a legitimate medical reason and inhalants used illegally. Included is marijuana or cannabis in all forms.
- H. Reasonable Cause/Reasonable Suspicion – Supported by evidence strong enough to establish that a policy violation has occurred.
- I. Testing – Is generally defined as an urine, breath test to determine chemical or drug content. Any employee may be tested for drug or alcohol use when there is “reasonable cause/reasonable suspicion” that:
1. Use of substance is affecting performance; or,
  2. The employee is engaged in any of the prohibited acts or activities listed in this policy.
- J. Under the Influence – A state of having an alcohol concentration of 0.10 or more, where “alcohol concentration” has the meaning assigned to it in Article 67011-1, Revised Statutes; or the state of not having the normal use of mental or physical faculties resulting from the voluntary substance.

### **GENERAL POLICY PROVISION:**

Any of the following actions constitutes a violation of the Policy and may subject an employee to disciplinary action to include immediate termination:

- A. Using, selling, purchasing, transferring, possessing, manufacturing, or storing an illegal drug or drug paraphernalia, or attempting or assisting another to do so, while in the course of employment or engaged in a company sponsored activity, on premises, in owned, leased or rented vehicles, or on business.
- B. Working or reporting to work, conducting company business or being in a company-owned, leased or rented vehicle while under the influence of an illegal drug, alcohol or in an impaired condition.

### **SEARCH:**

Search procedures, conducted under reasonable cause, such as inspections of employee's personal property including briefcases, lunch boxes, or tool boxes, will be maintained as part of the company's security measures. All employees will be expected to cooperate as a condition of continued employment with special drug/alcohol searches of personal vehicles on company property when there is reasonable suspicion to believe that an employee may be in possession of drugs or alcohol. Searches on company premises and company property can be conducted at any time.

### **PREVENTIVE ACTS:**

- A. Employees taking prescription drugs prescribed by an attending physician must advise their direct Supervisor in writing of the possible effects of such medication regarding their job performance and physical/mental capabilities. This written information must be kept confidential and communicated to the direct supervisor prior to the employee commencing work. All medical information will be kept confidential and the employer, without exception, will punish any breach of privacy and confidentiality in this regard. All prescription drugs must be kept in their original container.
- B. Any employee involved in a work related accident where alcohol or drugs are believe to be a contributing factor will be referred to an employee assistance counselor in addition to any other accident investigation activities.

### **CORRECTIVE ACT:**

Any employee involved in a work related accident may be subject to urine and breath testing for drug or alcohol use or abuse.

### **SUPERVISORY AND EMPLOYEE TRAINING:**

Supervisors will receive training regarding the Drug and Alcohol Policy and the use of the Employee Assistance Program. All employees will receive copies of the Drug and Alcohol Policy and information about the Employee Assistance Program.

### **EMPLOYEE ASSISTANCE PROGRAM:**

The company will provide employees and their families with confidential, professional assessment and referral for assistance in resolving or accessing treatment for addiction to, dependence on, or problems with alcohol, drugs or other personal problems adversely affecting their job performance. Confidential assessment and referral services will be provided without cost to the employee or family member. The cost of treatment, counseling or rehabilitation resulting from EAP referral will be the responsibility of the employee.

When documented job impairment has been observed and identified, a supervisor may recommend participation in the EAP. Any action taken by the supervisor, however, will be based on job performance.

Supervisor referrals to the EAP will include employee's release of information consent form to be returned to the company supervisor by the EAP. Refusal to participate in or failure to complete the EAP-directed program will be documented. Should job performance not improve after a reasonable amount of time, the employee is subject to progressive corrective action up to and including termination of employment.

Self-referrals by employees or family members are strongly encouraged. The earlier a problem is addressed, the easier it is to deal with and the higher the success rate. While self-referral in itself does not preclude company's use of corrective actions, participation in an EAP-directed program may enable the supervisor to allow time for completion of such a program before initiating or determining additional corrective actions.

EAP-related activities, such as referral appointments, will be treated on the same basis as other personal business or health matters with regards to use

of sick or compensation leave. Sick leave may be taken as needed, while compensation time must be pre-approved.

### **COORDINATION WITH LAW ENFORCEMENT AGENCIES:**

The sale, use, purchase, transfer or possession of an illegal drug or drug paraphernalia is a violation of the law. The company will report information concerning possession, distribution, or use of any illegal drugs to Law Enforcement officials and will turn over to the custody of law enforcement officials any such substances found during a search of an individual or property. Searches will only be conducted of individuals based on reasonable cause; and only of their vehicles, lockers, desks, closets when based on reasonable suspicion. The company will cooperate fully in the prosecution and/or conviction of any violation of the law.

### **RESERVATION OF RIGHTS:**

The company reserves the right to interpret, change, suspend, cancel or dispute, with or without notice, all or any part of the Policy, or procedures or benefits discussed herein. Employees will be notified before implementation of any change.

Although adherence to this Policy is considered a condition of continued employment, nothing in this Policy alters an employee's status and shall not constitute nor be deemed a contract or promise of employment. Employees remain free to resign their employment at any time for any or no reason, without notice, and the company retains the right to terminate any employee at any time, for any or no reason, without notice.

### **OTHER LAWS AND REGULATIONS:**

The provisions of this Policy shall apply in addition to, and shall be subordinated to, any requirements imposed by applicable federal, state or local laws, regulation or judicial decisions. Unenforceable provisions of this policy shall be deemed to be deleted.

## **EMPLOYEE ACKNOWLEDGMENT**

I acknowledge that I have received a copy of the Drug-Free Workplace Policy. I also acknowledge that the provisions of the Policy are part of the terms and conditions of my employment and that I agree to abide by them.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Employee

\_\_\_\_\_  
Printed Name of Employee

\_\_\_\_\_  
Employee Social Security #