SAFETY POLICY MANUAL

PH Earthworks

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Section 1: Safety Policy Statement

PH Earthworks is committed to providing a safe and healthy work environment for all employees, subcontractors, and visitors. Safety is a core value of our organization, and we believe that all workplace injuries and illnesses are preventable.

The owner and operator accepts responsibility for the safety and health of all personnel and is committed to providing the resources necessary to maintain a safe workplace. Every employee and subcontractor shares in this responsibility and is expected to follow all safety policies, procedures, and practices.

Our safety goals are:

- Zero workplace injuries and illnesses
- Full compliance with all applicable OSHA regulations and Ohio state safety requirements
- Continuous improvement of our safety program through training, hazard identification, and corrective action
- Active participation of all employees in maintaining a safe work environment

Section 2: Responsibilities

2.1 Owner/Employer Responsibilities

The owner is responsible for:

- Establishing, implementing, and maintaining this safety program
- Providing necessary safety training and resources
- Ensuring compliance with OSHA regulations and Ohio state laws
- Investigating all incidents and near-misses
- Providing appropriate personal protective equipment (PPE) at no cost to employees
- Maintaining equipment in safe operating condition
- Serving as the designated Competent Person for excavation and trenching operations
- Conducting frequent and regular inspections of job sites, materials, and equipment
- Ensuring defective equipment is tagged out and removed from service

2.2 Employee Responsibilities

All employees are responsible for:

- Following all safety policies, procedures, and work practices
- Using required PPE correctly
- Reporting hazards, injuries, and near-misses immediately
- Participating in safety training
- Operating equipment only when trained and authorized
- Maintaining a clean and orderly work area
- Never working under the influence of drugs or alcohol
- Voicing safety concerns without fear of reprisal

2.3 Subcontractor Responsibilities

All subcontractors working for PH Earthworks must:

- Comply with all OSHA regulations and this safety policy
- Provide their own appropriate PPE
- Maintain required certifications and licenses (including CDL where applicable)
- Report all incidents, injuries, and hazards to the site supervisor
- Participate in job site safety briefings
- Coordinate hazard communication with PH Earthworks

Section 3: Excavation and Trenching Safety

This section applies to all excavation work including basements, footers, septic systems, water lines, and pond construction. PH Earthworks typically excavates to depths of 8-9 feet, with occasional excavations up to 15 feet. All excavation work shall comply with OSHA 29 CFR 1926 Subpart P.

3.1 Competent Person Requirements

The owner is the designated Competent Person for all excavation and trenching operations. The Competent Person shall:

- Conduct daily inspections of excavations before work begins and after any event that could affect stability (rain, vibration, etc.)
- Classify soil type using visual and manual testing methods
- Determine appropriate protective systems based on soil classification and excavation depth
- Have authority to remove workers from hazardous conditions immediately
- Ensure adequate means of egress (ladders, ramps) within 25 feet of workers

3.2 Protective Systems

PH Earthworks primarily uses benching as the protective system for excavations. The following requirements apply:

- All excavations 5 feet or deeper require a protective system unless the excavation is in stable rock
- Benching shall be performed according to OSHA requirements based on soil classification
- For Type B soil: Maximum bench height of 4 feet with maximum bench slope of 1:1 (45 degrees)
- For Type C soil: Benching is not permitted; sloping at 1.5:1 (34 degrees) or shoring/shielding required
- Alternative protective systems (trench boxes, shoring) may be used when conditions warrant

3.3 Underground Utilities

Before any excavation work begins:

- Contact Ohio 811 (call 811 or 1-800-362-2764) at least 48 hours before digging
- Wait for all utilities to be marked before beginning excavation
- Hand dig within 18 inches of marked utility locations
- Maintain minimum clearances from exposed utilities as required
- If unmarked utilities are discovered, stop work and notify the utility company immediately

3.4 Spoil Pile Management

- Keep spoil piles at least 2 feet from the edge of excavations
- Use spoil to create a barrier to prevent equipment and materials from falling into excavation
- Never place heavy equipment near the edge of an unshored excavation

3.5 Access and Egress

- Provide ladders, stairs, or ramps for excavations 4 feet or deeper
- Position access points so workers never travel more than 25 feet laterally to reach them
- Ladders must extend at least 3 feet above the edge of the excavation
- Secure ladders at the top to prevent displacement

3.6 Water Accumulation

- Do not work in excavations where water has accumulated unless adequate precautions are taken
- Use pumps or other means to control water accumulation
- If dewatering equipment is used, monitor continuously to ensure proper operation

Section 4: Heavy Equipment Safety

PH Earthworks operates bulldozers, excavators, and skid steers with various attachments including rock hounds, Harley rakes, smooth buckets, teeth buckets, and bush hogs.

4.1 Operator Requirements

- Only trained and authorized personnel may operate heavy equipment
- Operators must demonstrate competency before operating equipment independently
- CDL-required vehicles may only be operated by personnel with valid CDL credentials
- No equipment operation under the influence of alcohol, drugs, or medications that impair judgment

4.2 Pre-Operation Inspection

Before operating any equipment, conduct a walk-around inspection checking:

- Fluid levels (oil, hydraulic fluid, coolant, fuel)
- Tires/tracks for damage or wear
- Hydraulic hoses and cylinders for leaks
- Safety devices (backup alarms, lights, mirrors, seatbelts)
- Attachments for secure mounting and proper function
- Controls for proper operation
- Guards and safety devices are in place
- Report any defects immediately; do not operate defective equipment

4.3 Safe Operating Practices

- Always wear seatbelts when operating equipment with ROPS
- Keep cab doors and windows closed during demolition operations
- Maintain three points of contact when mounting/dismounting equipment
- Never allow riders on equipment unless designed for passengers
- Lower all attachments to the ground when parked
- Set parking brake and remove key when leaving equipment unattended
- Maintain clear visibility; use a spotter when visibility is limited
- Keep a safe distance from overhead power lines (minimum 10 feet for lines up to 50kV)
- Never swing loads over workers

4.4 Equipment Maintenance and Lockout/Tagout

- Follow manufacturer's maintenance schedules
- Document all maintenance and repairs

- Tag out defective equipment until repaired using "DANGER - DO NOT OPERATE" tags
- Before performing maintenance or repairs, shut down equipment and remove key
- Relieve hydraulic pressure before disconnecting lines
- Block or support any raised components before working underneath
- Never bypass or remove safety guards

Section 5: Crane Operations

PH Earthworks does not operate cranes with company employees. All crane operations are subcontracted to qualified crane contractors. This section establishes requirements for crane subcontractors and safe practices when working around crane operations.

5.1 Subcontractor Requirements

All crane subcontractors must provide documentation of the following before beginning work:

- Valid crane operator certification (NCCCO, CIC, or equivalent accredited certification)
- Current certificate of insurance with adequate liability coverage
- Proof of equipment inspection (annual inspection documentation)
- Rigging certification for personnel performing rigging duties
- Compliance with OSHA 29 CFR 1926 Subpart CC (Cranes and Derricks in Construction)

5.2 Pre-Lift Requirements

Before any crane lift operation:

- Crane subcontractor must conduct a site assessment for ground conditions, overhead hazards, and power line proximity
- A lift plan must be developed for critical lifts (lifts exceeding 75% of crane capacity, lifts over occupied areas, or multi-crane lifts)
- Ensure adequate ground support and use of outrigger pads/mats as needed
- Verify load weight and confirm it is within crane capacity for the lift radius
- Establish a controlled access zone around the crane operation

5.3 Power Line Safety

Crane operations near power lines require strict adherence to clearance requirements:

- Maintain minimum clearance of 10 feet for power lines up to 50kV
- For lines over 50kV, add 0.4 inches for each 1kV over 50kV
- If closer work is required, power lines must be de-energized or moved by the utility company
- A dedicated spotter is required when operating near power lines
- Assume all power lines are energized unless verified otherwise by the utility

5.4 Working Around Crane Operations

All PH Earthworks employees working near crane operations must:

- Stay clear of the swing radius and load path at all times

- Never walk or work under a suspended load
- Maintain communication with the crane operator and signal person
- Wear required PPE including hard hat and high-visibility vest
- Follow all directions from the crane operator and rigging crew
- Keep unauthorized personnel out of the crane work area

5.5 Signal Person Requirements

When PH Earthworks personnel are required to direct crane movements:

- Only trained and qualified signal persons may direct crane operations
- Use standard hand signals per OSHA/ASME standards
- Maintain constant visual contact with the crane operator
- Signal person must be clearly identifiable (high-visibility vest)
- If radio communication is used, establish clear protocols before lift

Section 6: Demolition Safety

Demolition work presents unique hazards including structural collapse, hazardous materials exposure, and airborne debris. All demolition work shall be performed in accordance with OSHA 29 CFR 1926 Subpart T.

6.1 Pre-Demolition Survey

Before beginning any demolition work:

- Conduct an engineering survey to determine structural conditions
- Identify and document potential hazardous materials (asbestos, lead paint)
- Ensure all utilities have been disconnected and capped
- Check for hazardous chemicals, gases, or explosives
- Develop a demolition plan addressing sequence and methods

6.2 Asbestos and Lead Awareness

Private residential structures may contain asbestos or lead-based paint that has not been abated. Before demolition:

- Assume older structures (pre-1980) may contain asbestos and lead until confirmed otherwise
- If asbestos-containing materials are suspected, stop work and consult a licensed asbestos professional
- PH Earthworks does not perform asbestos abatement; this work must be completed by licensed contractors before demolition begins
- For structures with suspected lead paint, follow EPA RRP Rule requirements
- All employees shall receive asbestos awareness training annually

6.3 Structural Stability

- Never undercut or undermine structural elements
- Remove materials from the top down
- Maintain a safe distance from walls being demolished
- Be aware of potential collapse zones
- Stop work immediately if unexpected structural movement occurs

Section 7: Silica Exposure Control Plan

This written exposure control plan addresses respirable crystalline silica hazards in accordance with OSHA 29 CFR 1926.1153. Silica exposure may occur during concrete work, demolition, and excavation activities.

7.1 Scope and Application

This plan applies to all tasks that may generate respirable crystalline silica, including:

- Concrete cutting, breaking, or crushing
- Demolition of concrete or masonry structures
- Excavation in soil containing crystalline silica
- Any task that generates visible dust from concrete, stone, or masonry materials

7.2 Competent Person

The owner is designated as the Competent Person for silica exposure control and is responsible for:

- Implementing this written exposure control plan
- Conducting frequent inspections of job sites to ensure compliance
- Identifying existing and foreseeable silica hazards
- Taking prompt corrective action to eliminate or minimize hazards

7.3 Exposure Control Methods

PH Earthworks uses the following engineering and work practice controls to limit silica exposure:

- Use of enclosed cab equipment with HEPA-filtered air (MERV-16 or better) during demolition and concrete work
- Wet methods to suppress dust when cutting or breaking concrete
- Positioning workers upwind of dust-generating activities when possible
- Limiting access to work areas where high silica exposures may occur

7.4 Respiratory Protection for Silica

When engineering controls are not sufficient to reduce exposure below the permissible exposure limit (50 µg/m³):

- Workers shall wear respiratory protection rated N95 or higher
- For tasks outside enclosed cabs generating visible concrete dust, minimum APF 10 respirator required
- See Section 9 (Respiratory Protection Program) for respirator requirements

7.5 Housekeeping for Silica

- Do not use compressed air to clean clothing or surfaces unless combined with ventilation system
- Do not dry sweep or dry brush where silica dust is present
- Use wet sweeping, HEPA-filtered vacuuming, or other methods that minimize dust

7.6 Medical Surveillance

Medical surveillance shall be offered to employees who are required to wear a respirator for silica exposure for 30 or more days per year. Medical exams include chest X-ray and lung function tests every three years.

Section 8: Hazard Communication Program

This written Hazard Communication Program is established in accordance with OSHA 29 CFR 1926.59 to ensure employees are informed about chemical hazards in the workplace.

8.1 Chemical Inventory

PH Earthworks maintains an inventory of hazardous chemicals used in the workplace, including but not limited to:

- Diesel fuel and gasoline
- Hydraulic fluid
- Motor oil and lubricants
- Fertilizers (for hydroseeding operations)
- Concrete sealants and form release agents

The chemical inventory list is maintained at the shop and updated when new chemicals are introduced.

8.2 Safety Data Sheets (SDS)

- SDS are maintained for all hazardous chemicals and kept at the shop location
- SDS shall be readily accessible to all employees during work shifts
- SDS will be transported to job sites when chemicals are used on site
- Employees must review SDS before using any chemical product
- Request SDS from suppliers for all new products before use

8.3 Container Labeling

- All containers must display original manufacturer labels
- Labels must include product identifier, hazard warnings, and manufacturer information
- Secondary containers must be labeled with product name and hazard warnings
- Never use unlabeled containers
- Replace damaged or illegible labels immediately

8.4 Employee Training

All employees shall receive hazard communication training at initial hire and when new hazards are introduced. Training includes:

- Location and availability of this written program and SDS
- Physical and health hazards of chemicals in the work area
- How to read and interpret labels and SDS
- Protective measures and PPE requirements
- Emergency procedures for spills or exposures

8.5 Fuel Handling and Storage

- Store fuel in approved containers away from ignition sources
- No smoking within 50 feet of fuel storage or refueling operations
- Shut off equipment engines before refueling
- Ground portable fuel containers during transfer
- Clean up spills immediately using appropriate absorbent materials
- Maintain fire extinguisher near fuel storage areas

8.6 Hydroseeding Materials

Hydroseeding operations involve wood mulch, grass seed, and fertilizer:

- Review SDS for all fertilizer products before use
- Wear appropriate PPE when handling fertilizers (gloves, eye protection)
- Avoid inhaling dust from dry materials
- Wash hands thoroughly after handling
- Store fertilizers in a dry location away from incompatible materials

8.7 Multi-Employer Worksite Coordination

When working on multi-employer job sites:

- Inform other employers of chemical hazards their employees may be exposed to
- Obtain information about hazardous chemicals used by other employers on site
- Make SDS available to other employers upon request

Section 9: Respiratory Protection Program

This written Respiratory Protection Program is established in accordance with OSHA 29 CFR 1910.134 to protect employees from respiratory hazards.

9.1 Program Administrator

The owner is designated as the Respiratory Protection Program Administrator and is responsible for:

- Administering and overseeing this respiratory protection program
- Selecting appropriate respirators for identified hazards
- Ensuring employees receive medical evaluations and fit testing
- Providing training on respirator use
- Evaluating program effectiveness annually

9.2 Respirator Selection

Respirators are selected based on the hazard and exposure level:

- Demolition dust (outside enclosed cab): N95 filtering facepiece respirator minimum
- Silica exposure: N95 or higher, based on exposure level and Table 1 requirements
- All respirators must be NIOSH-certified

9.3 Medical Evaluation

Before an employee is fit tested or required to use a respirator:

- Employee must complete the OSHA Respirator Medical Evaluation Questionnaire
- Questionnaire must be reviewed by a physician or licensed health care professional (PLHCP)
- PLHCP will provide written recommendation on employee's ability to use a respirator
- Medical evaluations are provided at no cost to employees
- Follow-up medical examination provided if PLHCP deems necessary

9.4 Fit Testing

Employees required to wear tight-fitting respirators must pass a fit test:

- Fit testing conducted before initial use of a respirator
- Fit testing repeated annually
- Fit testing repeated when employee reports changes in physical condition that could affect fit

- Fit testing repeated if a different respirator facepiece is used
- Qualitative or quantitative fit test methods may be used

9.5 Respirator Use

- Conduct user seal check before each use
- Do not use respirator if facial hair interferes with seal
- Leave contaminated area immediately if respirator malfunctions, becomes damaged, or breathing becomes difficult
- Do not remove respirator in contaminated area

9.6 Maintenance and Care

- Clean and disinfect respirators after each use
- Inspect respirators before each use for damage
- Replace filters, cartridges, and other components per manufacturer recommendations
- Store respirators in clean, dry location protected from contamination
- Dispose of single-use respirators (N95s) at end of shift or when breathing resistance increases

9.7 Voluntary Use of Respirators

When employees choose to wear filtering facepiece respirators (N95) voluntarily and respirator use is not required:

- Employees will be provided with OSHA Appendix D information
- Employer will ensure voluntary use does not create a hazard
- Medical evaluation and fit testing are not required for voluntary filtering facepiece use

9.8 Training

Employees required to use respirators shall receive training on:

- Why the respirator is necessary and how improper use can be dangerous
- Limitations and capabilities of the respirator
- How to properly don, doff, adjust, and wear the respirator
- How to perform user seal checks
- Maintenance, storage, and inspection procedures
- Recognition of medical signs and symptoms that may limit respirator use

9.9 Recordkeeping

- Medical evaluation records retained per OSHA 1910.1020 (duration of employment plus 30 years)
- Fit test records retained until next fit test is administered

- Written copy of this program retained and made available to employees

Section 10: Confined Space Awareness

PH Earthworks may encounter confined spaces during excavation, septic system installation, or other operations. A confined space is a space that: (1) is large enough for an employee to enter, (2) has limited means of entry or exit, and (3) is not designed for continuous occupancy.

10.1 Confined Space Identification

Examples of confined spaces that may be encountered include:

- Deep excavations and trenches (greater than 4 feet)
- Septic tanks
- Manholes
- Tanks and vaults

10.2 General Requirements

- Identify potential confined spaces before beginning work
- Evaluate whether confined space entry is necessary or if work can be accomplished from outside
- If permit-required confined space entry is necessary, stop work and implement appropriate entry procedures or contact a qualified contractor
- Never enter a confined space without proper training, equipment, and authorization
- Atmospheric testing is required before entry into any space where hazardous atmosphere is suspected

10.3 Deep Excavation Considerations

Excavations deeper than 4 feet should be evaluated for confined space hazards:

- Test for hazardous atmospheres if decomposing materials, utilities, or other sources of contamination are present
- Ensure adequate ventilation
- Maintain communication with workers in excavation
- Have rescue procedures in place before entry

Section 11: Fire Prevention Plan

This Fire Prevention Plan is established in accordance with OSHA 29 CFR 1926.24 and addresses fire hazards at PH Earthworks job sites and shop facility.

11.1 Major Fire Hazards

The following are identified as major fire hazards in PH Earthworks operations:

- Fuel storage and handling (diesel, gasoline)
- Hydraulic fluid leaks on hot equipment
- Hot work operations (welding, cutting, grinding) when performed
- Electrical equipment and wiring
- Combustible materials at job sites (wood, vegetation during clearing)

11.2 Fire Prevention Procedures

- Store flammable liquids in approved containers away from ignition sources
- No smoking within 50 feet of fuel storage, refueling operations, or combustible materials
- Keep equipment clean of oil, grease, and debris buildup
- Inspect electrical cords and equipment for damage before use
- Maintain clear access to fire extinguishers at all times
- Remove combustible debris from work areas regularly

11.3 Fire Protection Equipment

The owner is responsible for maintenance of fire control and prevention equipment.

- Fire extinguishers (minimum 2A:10B:C rating) shall be maintained at the shop and on each piece of mobile equipment
- Fire extinguishers shall be inspected monthly and serviced annually
- Fire extinguishers shall be readily accessible and not blocked
- All employees shall be trained on proper fire extinguisher use

11.4 Hot Work Procedures

When welding, cutting, or grinding operations are performed:

- Remove combustible materials within 35 feet or protect with fire-resistant covers
- Have a fire extinguisher within immediate reach
- Inspect area for smoldering fires for at least 30 minutes after hot work is completed
- Never perform hot work on containers that have held flammable materials without proper cleaning and testing

11.5 Emergency Response

- If a fire cannot be immediately controlled with a portable extinguisher, evacuate the area and call 911
- Account for all personnel at a designated meeting point
- Do not re-enter the area until cleared by fire department

Section 12: Personal Protective Equipment (PPE)

This section establishes PPE requirements in accordance with OSHA 29 CFR 1926 Subpart E. PH Earthworks provides required PPE at no cost to employees.

12.1 Hazard Assessment

A hazard assessment has been conducted to identify PPE requirements for PH Earthworks operations. The following hazards have been identified:

- Head injuries: Falling objects, overhead hazards, demolition debris
- Eye injuries: Flying particles, dust, debris
- Hearing damage: Heavy equipment noise exceeding 85 dBA
- Respiratory hazards: Dust from demolition, silica from concrete
- Hand injuries: Abrasions, cuts, chemical contact
- Foot injuries: Heavy objects, punctures
- Struck-by hazards: Moving equipment, vehicle traffic

12.2 Minimum PPE Requirements

The following PPE is required at all job sites:

- Hard hat (Type I, Class E minimum) when overhead hazards exist or during demolition
- Safety glasses or goggles with side shields
- High-visibility vest (Class 2 minimum) when working near traffic or equipment
- Steel-toed or safety-toed work boots
- Work gloves appropriate for the task

12.3 Task-Specific PPE

- Respiratory protection: N95 or higher during dusty demolition operations when not in an enclosed cab
- Hearing protection: Required when operating heavy equipment or when noise levels exceed 85 dBA
- Face shield: When operating brush hog or clearing operations with debris hazard
- Chemical-resistant gloves: When handling fertilizers or fuel

12.4 Hearing Conservation

Heavy equipment operation typically generates noise levels exceeding 85 dBA. To protect against hearing damage:

- Hearing protection (earplugs or earmuffs) required when operating equipment outside an enclosed cab
- Hearing protection recommended even in enclosed cabs during extended operations

- Employees shall be trained on proper insertion/use of hearing protection
- Signs of hearing damage (ringing in ears, difficulty hearing) should be reported immediately

12.5 PPE Care and Maintenance

- Inspect PPE before each use
- Replace damaged or worn PPE immediately
- Clean and store PPE properly
- Hard hats must be replaced if cracked, dented, or after any impact
- Replace hard hat suspension every 12 months and shell every 5 years

12.6 PPE Training

Employees shall be trained on PPE including:

- When PPE is necessary
- What PPE is required for specific tasks
- How to properly don, doff, adjust, and wear PPE
- Limitations of PPE
- Proper care, maintenance, useful life, and disposal of PPE

Section 13: Hand and Power Tool Safety

This section establishes safe work practices for hand and power tools in accordance with OSHA 29 CFR 1926 Subpart I.

13.1 General Requirements

- Use the right tool for the job
- Inspect tools before each use
- Do not use damaged or defective tools
- Keep cutting tools sharp
- Do not carry tools in a manner that could cause injury (e.g., sharp tools in pockets)
- Store tools properly when not in use

13.2 Power Tool Safety

- All power tools must have guards in place when provided by the manufacturer
- Never remove or bypass safety guards
- Disconnect power tools before changing blades, bits, or accessories
- Keep cords away from heat, oil, and sharp edges
- Do not carry power tools by the cord
- Secure work with clamps or vise when practical
- Wear appropriate PPE (eye protection, hearing protection) when operating power tools

13.3 Grinders and Abrasive Wheels

- Inspect abrasive wheels for cracks or damage before mounting
- Ensure wheel guard covers at least half of the wheel
- Allow newly mounted wheels to run at operating speed for one minute before grinding
- Never exceed maximum RPM rating of the wheel
- Wear face shield and safety glasses when grinding

13.4 Damaged Tool Procedures

- Tag damaged tools "DO NOT USE" and remove from service
- Report damaged tools to supervisor
- Do not attempt to repair tools unless qualified
- Dispose of damaged tools that cannot be safely repaired

Section 14: Electrical Safety

This section addresses electrical safety requirements in accordance with OSHA 29 CFR 1926 Subpart K.

14.1 General Electrical Safety

- Only qualified persons may work on electrical systems
- Assume all power lines and electrical equipment are energized unless verified otherwise
- Maintain minimum clearance distances from overhead power lines
- Report damaged electrical equipment immediately
- Do not use electrical equipment in wet conditions unless rated for such use

14.2 Power Line Clearances

Maintain the following minimum clearances from overhead power lines:

- Lines up to 50kV: 10 feet minimum
- Lines over 50kV: 10 feet plus 0.4 inches for each 1kV over 50kV
- When voltage is unknown, assume greater than 50kV and maintain 20 feet minimum
- Use a spotter when operating equipment near power lines

14.3 Extension Cords and Portable Equipment

- Inspect cords before each use for damage to insulation, plugs, and connectors
- Do not use cords with exposed wiring or damaged insulation
- Use only three-wire (grounded) extension cords
- Do not run cords through doorways, holes in walls, or where they may be damaged
- Use ground-fault circuit interrupters (GFCI) for all temporary power
- Do not overload circuits

14.4 Lockout/Tagout for Electrical Equipment

Before working on electrical equipment:

- De-energize equipment and lock out power source
- Apply a lock and tag with worker's name and date
- Test equipment to verify it is de-energized
- Only the person who applied the lock may remove it
- If multiple workers are involved, each applies their own lock

Section 15: Housekeeping

Good housekeeping is essential for maintaining a safe work environment. This section establishes housekeeping requirements in accordance with OSHA 29 CFR 1926.25.

15.1 General Requirements

- Keep work areas clean and orderly throughout each work shift
- Remove debris and waste materials regularly
- Store materials and equipment in an organized manner
- Keep walkways and access routes clear of obstructions
- Clean up spills immediately

15.2 Job Site Housekeeping

- Remove scrap materials, debris, and waste from work areas daily
- Stack materials safely to prevent collapse
- Keep excavation edges clear of loose materials
- Dispose of waste materials in designated containers or areas
- Remove protruding nails from lumber or bend them over

15.3 Shop Housekeeping

- Maintain clean floors free of oil, grease, and debris
- Store tools and equipment in designated locations
- Keep aisles and emergency exits clear
- Dispose of oily rags in approved metal containers
- Properly store flammable and combustible materials

15.4 Waste Disposal

- Separate and dispose of waste materials according to local regulations
- Do not burn waste materials on job sites unless specifically permitted
- Dispose of hazardous waste (oil, fuel, chemicals) according to applicable regulations
- Use covered containers for waste that could blow around

Section 16: Vehicle and Transportation Safety

PH Earthworks operates multiple vehicles including a one-ton flatbed dually pickup, a larger diesel flatbed truck, and a CDL dump truck. Personal vehicles are also used for transportation to job sites.

16.1 CDL Requirements

- Only personnel with valid Commercial Driver's Licenses may operate CDL-required vehicles
- CDL holders must maintain medical certification as required
- Report any license suspensions or restrictions immediately
- Follow all Hours of Service regulations

16.2 Vehicle Inspection

- Conduct pre-trip inspection before operating any company vehicle
- Check lights, brakes, tires, mirrors, and safety equipment
- Verify load is properly secured before transport
- Document and report any defects

16.3 Load Securement

- Secure all loads according to FMCSA regulations
- Use appropriate tie-downs, chains, and binders for equipment transport
- Check load securement at each stop
- Ensure equipment attachments are removed or secured before transport

16.4 Safe Driving Practices

- Obey all traffic laws
- No cell phone use while driving (hands-free only if necessary)
- Wear seatbelts at all times
- Adjust driving for weather and road conditions
- Never operate a vehicle while impaired by alcohol, drugs, or fatigue

Section 17: Emergency Action Plan

This Emergency Action Plan is established in accordance with OSHA 29 CFR 1926.35.

17.1 Emergency Contact Information

Emergency Type	Contact Number
Fire/Police/Ambulance	911
Ohio 811 (Utility Locate)	811 or 1-800-362-2764
Poison Control	1-800-222-1222
OSHA (Report Fatalities/Serious Injuries)	1-800-321-OSHA (6742)
Owner	[Insert Phone Number]

17.2 Emergency Procedures

In any emergency:

- Ensure your own safety first
- Call 911 for life-threatening emergencies
- Notify the site supervisor/owner immediately
- Do not move injured persons unless there is immediate danger
- Keep bystanders away from the scene
- Preserve the scene for investigation when safe to do so

17.3 Emergency Escape Routes

- At the shop: Exit through main doors or rear emergency exit; meet at front parking area
- At job sites: Identify and communicate escape routes and meeting points at start of each job
- In excavations: Know location of nearest ladder or ramp at all times

17.4 Excavation Collapse/Cave-in

- Call 911 immediately
- Do not enter the excavation to attempt rescue
- Attempt to communicate with trapped workers
- Prevent additional collapse by keeping people and equipment away from edges
- Wait for trained rescue personnel

17.5 Utility Strike

Gas Line Strike:

- Stop all work immediately
- Evacuate the area upwind
- Do not operate any equipment, vehicles, or electrical devices
- Call 911 and the gas company from a safe distance

Electrical Line Strike:

- If in equipment, stay in the cab unless there is fire
- If you must exit, jump clear without touching the equipment and ground simultaneously
- Keep everyone at least 35 feet away
- Call 911 and the power company

17.6 Accounting for Personnel

- Site supervisor shall maintain awareness of all personnel on site
- In an emergency evacuation, conduct headcount at designated meeting point
- Report any missing persons to emergency responders immediately

17.7 First Aid

A first aid kit shall be maintained at the shop and transported to job sites. Contents should include bandages, antiseptic, burn treatment, eye wash, and other basic supplies.

Recommendation: At least one employee should obtain First Aid/CPR/AED certification. Emergency medical services response time may exceed 5 minutes in rural areas.

Section 18: Incident Reporting and Investigation

18.1 Reporting Requirements

All incidents must be reported to the site supervisor/owner immediately, including:

- All injuries, no matter how minor
- Near-miss incidents
- Property damage
- Equipment failures
- Utility strikes
- Environmental releases (fuel spills, etc.)

18.2 OSHA Reporting Requirements

The following incidents must be reported to OSHA:

- Fatality: Report within 8 hours
- In-patient hospitalization: Report within 24 hours
- Amputation: Report within 24 hours
- Loss of an eye: Report within 24 hours

OSHA can be reached at 1-800-321-OSHA (6742) or online at osha.gov.

18.3 OSHA Recordkeeping

Note: Employers with 10 or fewer employees are generally exempt from routine OSHA recordkeeping requirements (OSHA 300 Log). However, PH Earthworks must still:

- Report fatalities, hospitalizations, amputations, and eye losses to OSHA as required above
- Comply with any OSHA requests for injury/illness data
- Maintain records of this safety program and training documentation

18.4 Investigation Process

All incidents will be investigated to determine root cause and prevent recurrence:

- Secure the scene and provide medical attention
- Document the incident (photos, witness statements, conditions)
- Identify contributing factors and root causes
- Determine corrective actions
- Implement corrective actions and follow up
- Communicate lessons learned to all employees

Section 19: Training Requirements

19.1 Required Training

All employees shall receive training in the following areas:

- New employee safety orientation (before beginning work)
- Hazard communication (initial and when new hazards introduced)
- Personal protective equipment (initial and when new PPE required)
- Excavation and trenching safety (for workers in excavations)
- Heavy equipment operation (equipment-specific, before operating)
- Asbestos awareness (annual)
- Silica awareness and exposure control (initial and annual)
- Respiratory protection (before using respirators)
- Fire prevention and extinguisher use
- Emergency procedures

19.2 Recommended Training

- OSHA 10-Hour Construction Safety (recommended for all employees)
- OSHA 30-Hour Construction Safety (recommended for supervisors)
- First Aid/CPR/AED certification (recommended for at least one employee)
- Competent Person training for excavation

19.3 Training Documentation

- Maintain records of all safety training
- Document date, topic, trainer, and attendees for each training session
- Keep training records for duration of employment plus 3 years
- Provide refresher training annually or when procedures change
- Retrain employees who do not demonstrate understanding of training material

Section 20: Policy Review and Updates

This safety policy shall be reviewed annually and updated as necessary to reflect changes in operations, regulations, or best practices. All employees will be notified of policy changes and provided updated training as needed.

Employees are encouraged to provide suggestions for improving workplace safety. Report safety concerns or suggestions to the owner. Employees may voice safety concerns without fear of reprisal.

This written program shall be kept at the workplace and made available for employee review upon request.

Employee Acknowledgment

I acknowledge that I have received a copy of the PH Earthworks Safety Policy Manual. I understand that I am responsible for reading and understanding the policies contained in this manual. I agree to follow all safety policies, procedures, and work practices.

I understand that failure to comply with safety policies may result in disciplinary action, up to and including termination of employment.

I understand that I have the right and responsibility to report unsafe conditions or practices without fear of retaliation.

_____

Employee Signature Date

_____

Print Name

_____

Owner/Supervisor Signature Date