

SAFETY MANUAL

REFLECTIONS GLASS & MIRROR, INC

EFFECTIVE | REVISION DATE: 6-1-22

MADE IN
USA

29 CFR



Table of Contents

POLICY STATEMENT ON SAFETY.....	1
DUTIES AND RESPONSIBILITIES	2
AERIAL LIFTS.....	4
BLOODBORNE PATHOGENS.....	6
DISCIPLINARY PROGRAM	10
DRIVING SAFETY	14
EMERGENCY ACTION PLAN	17
FALL PROTECTION	19
FIRE PREVENTION/ EXTINGUISHERS.....	22
FIRST AID	24
FORKLIFT SAFETY	26
GENERAL SAFETY	31
HAND AND POWER TOOLS PROGRAM	34
HAZARD COMMUNICATION	40
HEAT ILLNESS PREVENTION.....	47
INCIDENT INVESTIGATION AND REPORTING	50
INJURY AND ILLNESS RECORDKEEPING.....	56
LADDER SAFETY.....	57
NON-DOT DRUG & ALCOHOL POLICY	61
PPE PROGRAM	64
RISK ASSESSMENT	70

POLICY STATEMENT ON SAFETY

Reflections Glass & Mirror ownership and management is very interested in & committed to working with you to provide a safe place in which to work. The prevention of accidents and injuries to our employees is the prime objective.

All Reflections Glass & Mirror personnel are expected to take an active and constant interest in the prevention of accidents. We call upon all employees to use good common sense and in all their actions, take a second to think of the consequences to your fellow employees. We cannot overemphasize that all employees must do their part to minimize accidents.

Please show your support by demonstrating the following:

1. FOLLOWING REFLECTIONS GLASS & MIRROR, INC SAFETY RULES.
2. KEEPING WORK AREAS FREE OF UNSAFE CONDITIONS.
3. AVOIDING AND ELIMINATING UNSAFE ACTS.
4. PROMPTLY REPORTING UNSAFE ACTS AND CONDITIONS.
5. REPORTING ALL INCIDENTS IMMEDIATELY.

Accidents cause suffering and pain. We value each of you as individuals and hope you will cooperate with us in this important endeavor.

Any constructive criticism or suggestions toward improving safety on any of our jobs will be given prompt and careful consideration.

Sincerely,

Logan Erb
Safety Manager

Safety Manual Revised On: 6-1-22

DUTIES AND RESPONSIBILITIES

A successful Safety Management System can only be achieved and maintained when there is active interest, participation, and accountability at all levels of the organization. To ensure this, REFLECTIONS GLASS & MIRROR, INC, delegates the following safety duties to all management personnel. In some cases employees will need to perform safety duties outside their regular responsibilities to prevent accidents.

The Safety Manager must plan, organize, and administer the program by establishing policy, setting goals and objectives, assigning responsibility, motivating subordinates, and monitoring results. REFLECTIONS GLASS & MIRROR, INC management will support and maintain an ongoing Safety and Injury and Illness Prevention Program through the following:

1. Providing clear understanding and direction to all management and employees regarding the importance of safety through the development, implementation, monitoring and revision of policy and procedures.
2. Providing financial support for the Safety / Injury and Illness Prevention Program through the provision of adequate funds for the purchase of necessary safety materials, safety equipment, proper personal protective equipment, adequate time for employee safety training, and maintenance of tools and equipment.
3. Overseeing development, implementation, and maintenance of the safety manual, IIPP, and other required safety programs.
4. Maintaining a REFLECTIONS GLASS & MIRROR, INC commitment to accident prevention by expecting safe conduct on the part of all managers, supervisors, and employees.
5. Holding all levels of management and employees accountable for accident prevention and safety.
6. Reviewing all accident investigations to determine corrective action.

Managers and Supervisors play a key role in the prevention of accidents on the job. They have direct contact with the employees and know the safety requirements for various jobs. Safety responsibilities for these individuals include:

1. Enforce all safety program content and ensure safe work procedures.
2. Verifying corrective action has been taken regarding safety hazards and accident investigations.
3. Conducting periodic documented inspections of the work sites to identify and correct unsafe actions and conditions that could cause accidents.
4. Act as a leader in REFLECTIONS GLASS & MIRROR, INC safety policy and setting a good example by following all safety rules.
5. Becoming familiar with local, state, and federal safety regulations. The EHS Manager is available for assistance.
6. Train all new and existing employees in proper safety procedures and the hazards of the job.
7. Instruct all employees, under their supervision, in safe work practices and job safety requirements.
8. Hold weekly toolbox safety meetings with employees.
9. Ensure employee proficiency when assigning work requiring specific knowledge, special operations or equipment.
10. Ascertain that all machinery, equipment, and workstations are maintained in safe working condition and operate properly.
11. Correct unsafe acts and conditions that could cause accidents.
12. Communicate with all employees about safety and accident prevention activities.
13. Correct the cause of any accident as soon as possible.
14. Ascertain that proper first aid and firefighting equipment is maintained and used when conditions warrant its use.
15. Maintain good housekeeping conditions at all times.
16. Investigate all injuries and accidents to determine their cause and potential corrective action.

17. Ascertain that all injuries involving our employees that require medical attention are properly treated and promptly reported to the office.

The Safety Manager acts as a safety resource for REFLECTIONS GLASS & MIRROR, INC and is responsible for maintaining program records. They will also be our primary person to deal with outside agencies regarding the safety program and its contents. Additional duties include:

1. Coordination of all loss prevention activities as a representative of management. Acting as a consultant to management in the implementation and administration of the Safety Program.
2. Develop and implement loss prevention policies and procedures designed to insure compliance with the applicable rules and regulations of all federal, state, and local agencies.
3. Review all accident reports to determine cause and preventability.
4. Conduct periodic reviews of the program and job sites to evaluate performance, discuss problems and help solve them.
5. Consult with representatives of our insurance companies in order that their loss control services will support the Safety Program.
6. Review Workers' Compensation Claims. Help supply the insurance carrier with information about injured employees in order to keep loss reserves as low as possible.

Every employee is responsible for working safely, both for self-protection and for protection of fellow workers. Employees must also support all REFLECTIONS GLASS & MIRROR, INC safety efforts. Specific employee safety responsibilities include:

1. If you are unsure how to do any task safely, ask your supervisor.
2. Read and abide by all requirements of the Safety Manual.
3. Know and follow the Code of Safe Practices and all REFLECTIONS GLASS & MIRROR, INC safety policies and rules.
4. Wear all required personal protective equipment.
5. Report all accidents and injuries, no matter how minor, to your supervisor immediately.
6. Do not operate any equipment you have not been trained and authorized to use.
7. Report any safety hazards or defective equipment immediately to your supervisor.
8. Do not remove, tamper with or defeat any guard, safety device or interlock.
9. Never use any equipment with inoperative or missing guards, safety devices or interlocks.
10. Never possess, or be under the influence of, alcohol or controlled substances while on the premises.
11. Never engage in horseplay or fighting.
12. Participate in, and actively support, REFLECTIONS GLASS & MIRROR, INC safety program.

AERIAL LIFTS

Purpose

The purpose of this program is to establish safe operating standards and requirements for aerial lift devices and their related components.

Scope

This program shall cover all REFLECTIONS GLASS & MIRROR, INC owned, leased, rented or otherwise used aerial lifts and all REFLECTIONS GLASS & MIRROR, INC employees who may use aerial lifts during the course of employment with REFLECTIONS GLASS & MIRROR, INC.

Key Responsibilities

Safety Manager

- Implement and enforce this program.
- Ensure that this program complies with regulatory standards and update the program accordingly.
- Ensure that all aerial lift devices and related equipment comply with applicable regulatory standards and manufacturer recommendations.

Supervisors

- Ensure that all employees who may operate aerial lifts are properly trained.
- Ensure that horseplay and other unsafe acts are addressed through refresher training and / or disciplinary action if applicable.

Employees

- Comply with all parts of this program.
- Ensure they are properly trained and comfortable operating the aerial lift equipment prior to use.

Procedure

The following procedures shall be followed in order to achieve compliance with regulatory standards and ultimately keep employees safe on the job:

- Only authorized persons are allowed to operate aerial lift equipment.
- Aerial lift load limits shall not be exceeded beyond those recommended by the manufacturer.
- All aerial lift equipment will have a working back-up alarm. A spotter may be used in unusual circumstances or when the back-up alarm does not serve as an effective warning device.
- The minimum clearance between electrical lines and any part of the equipment is at least 10 feet.
- Employees shall stand firmly on the floor and shall not climb on the rails or the edge of the basket.
- An approved fall restraint system shall be attached to the boom or basket and worn by the operator while working from an aerial lift.

Inspections and Maintenance

All REFLECTIONS GLASS & MIRROR, INC aerial lift devices and equipment shall be inspected and maintained in accordance with the following:

- Only authorized personnel shall perform maintenance, and make repairs.
- Replacement parts must meet the original design specifications of the manufacturer.

- Modification to the equipment shall not be made without written approval from the manufacturer.
- Lift controls and equipment shall be tested/inspected before each use.
- Inspection shall be made at least daily and prior to each shift.
- If an inspection reveals any defect or hazardous condition, the equipment must be placed out of service until the necessary repairs are made and the equipment passes inspection.
- Lifts shall be maintained in a safe, reliable condition; free of excess grease, oil and other lubricants.
- Only noncombustible cleaning agents shall be used to clean the equipment whenever possible.

Training

REFLECTIONS GLASS & MIRROR, INC employees who may operate aerial lifts must receive initial training on the specific lift they may operate prior to assignment. Training shall include a combination of physical instruction or interactive computer learning and a written examination followed by a practical application / evaluation by an authorized person who has the knowledge and skills to adequately train and evaluate trainees. The authorized trainer must certify that operators have been trained by issuing certification cards or certificates with the instructors' name, the operator's name, the type of aerial lift and the training date printed legibly on the card or certificate.

Recordkeeping

All REFLECTIONS GLASS & MIRROR, INC aerial lift training documentation shall be kept for the duration of the operator's employment. Inspection and maintenance records shall be kept for as long as the equipment is in service.

BLOODBORNE PATHOGENS

Purpose

The purpose of this program is to establish and maintain a written exposure control plan that protects employees who may have contact with blood or any other potentially infectious material. This program is also designed to meet the requirements of OSHA 29 CFR 1910.1030; which requires employers who can reasonably anticipate exposure to prepare and implement a written exposure control plan.

Scope

This program applies to all occupational exposure to blood or other potentially infectious materials and covers all REFLECTIONS GLASS & MIRROR, INC employees. Employees whose responsibilities include cleaning up after a workplace injury, rendering first aid, providing life support or some other task that involves directly working with biohazards are more likely to have occupational exposure. However, any employee could be at risk as a result of blood from an injury that occurred in the past or a historical presence of bodily fluids that was not adequately decontaminated.

Responsibilities

Safety Manager (Exposure Control Officer)

- Serve as the designated “Exposure Control Officer”, which is responsible for the overall development and implementation of the exposure control procedure for all REFLECTIONS GLASS & MIRROR, INC worksites.
- Ensure that REFLECTIONS GLASS & MIRROR, INC fully complies with this program.

Supervisors

- Serve as the responsible person for all exposure control activities within their area of responsibility.
- Ensure that all employees comply with this program and report all non-compliance matters to the exposure control officer.

Employees

- Be aware of specific job tasks, situations and environments that may present biohazards.
- Comply with all parts of this program and report all non-compliance matters to the exposure control officer or your direct supervisor.
- Help REFLECTIONS GLASS & MIRROR, INC prevent blood or potentially infectious material exposure by working safely and practicing good personal hygiene.

Procedure

Procedure Reviews and Updates

The exposure control procedure must be reviewed on an annual basis and updated whenever a new procedure, activity or function with the potential to expose employees to biohazards is introduced into a worksite.

Universal Precautions

REFLECTIONS GLASS & MIRROR, INC and its employees shall observe universal precautions by treating all human blood and certain human body fluids as if they are known to be infectious for HIV, HBV and other pathogens even under circumstances where exposure is highly unlikely.

Exposure Controls

Exposure controls are designed to reduce or eliminate employee exposure to blood or potentially infectious materials and should be re-evaluated and revised if necessary on a regular basis to maximize their effectiveness in controlling employee exposure. Therefore:

- Hand washing facilities are readily available at all work locations except those that cannot support or simply do not have such facilities. In these cases, appropriate antiseptic solutions and / or towelettes are available for use.
- All sharps containers shall have a biohazard-warning label or a specific color to identify it as a biohazard, shall be resistant to punctures and shall be leak proof. The same characteristics shall apply to all secondary sharps containers.

Safe Work Practices

Safe work practices are designed to support exposure controls and further minimize or eliminate occupational exposure. Therefore:

- Employees must wash hands and other applicable body parts as soon as potentially contaminated gloves or other PPE are removed to further prevent contamination.
- If any part of the body has contact with blood or any other infectious material, employees must wash hands and other exposed body parts with soap and water immediately.
- Only trained and authorized personnel are allowed to handle sharps, sharps containers and any other potentially sharp and infectious needles or equipment.
- Activities such as applying make up, handling contact lenses, smoking or any other hand and eye, mouth, nose, ear or other body part contact is prohibited in areas where exposure to biohazards is possible.
- Storage areas such as pantries, freezers, refrigerators and others that may contain potentially infectious materials shall not contain food or drink.
- All equipment and surfaces that have had contact with blood or other infectious materials must be properly cleaned and decontaminated.
- All biological specimens must be contained in leak proof containers for handling, storage and transport to minimize potential contact with other surfaces and employees.
- In cases where the exterior surface of the specimen container is contaminated; the container must be placed into another leak proof container, which shall be labeled as "for handling and storage".
- All emergency responder, first aid or other potentially infectious supplies must be disposed of immediately and appropriately after contamination.

Personal Protective Equipment (PPE)

PPE shall be provided by REFLECTIONS GLASS & MIRROR, INC at no cost to the employee and must be of proper fit, adequate for the task at hand and readily available. Defective or damaged PPE must be discarded / replaced or repaired in order to ensure maximum effectiveness.

The following safe work practices shall be followed with regard to biohazards and PPE:

- Protective garments that are penetrated by blood or other infectious materials must be removed and properly disposed of immediately.
- PPE that may be contaminated must be removed and properly stored / contained before leaving the work area.
- PPE such as protective gloves must be worn whenever contact with potentially infectious material exposure is anticipated.
- Disposable PPE such as rubber gloves must be replaced as soon as practical when contamination has occurred or when they are rendered ineffective by a tear, puncture or other occurrence.

- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Whenever infectious material splashes, sprays or other similar occurrences are possible, PPE such as face shields, goggles, head garments or other appropriate PPE shall be used to protect face, eyes etc.
- Adequate PPE must be used unless temporarily declined by the employee and approved by the safety manager.
- PPE should be cleaned, laundered & properly disposed of if contaminated.
- All PPE must be cleaned, maintained, used, stored and disposed of properly when applicable.

Post-Exposure Requirements

All potential blood or infectious material exposure incidents shall be investigated by REFLECTIONS GLASS & MIRROR, INC thoroughly to ensure that hazards are abated and that affected employees receive the necessary treatment needed to minimize the impact of potential or actual exposure.

Recordkeeping

REFLECTIONS GLASS & MIRROR, INC shall meet OSHA 29 CFR 1920.1020(h) transfer of records standards in order to ensure regulatory compliance. Applicable records related to this standard and program shall be available to REFLECTIONS GLASS & MIRROR, INC employees and regulatory authorities upon request except for medical records, which are kept confidential and require the employee's written consent unless otherwise specified in 29 CFR 1910.1030 or other applicable laws.

Medical records shall be maintained in a safe and secure location for the duration of each employee's employment plus 5 years. The following information must be included for each employee's medical record:

- Full Name
- Social Security Number
- All records, notes, evaluations, etc. to and from the healthcare professional
- All REFLECTIONS GLASS & MIRROR, INC documentary records, notes, letters and other forms of communications

Labelling

Labels depicting the universal biohazard warning shall be used on all containers used to dispose of contaminated or potentially contaminated materials. Defacing or modifying these labels is prohibited. Labels that are found to be defective or inadequate shall be replaced with new and effective labels.

EXPOSURE INCIDENT CHECKLIST

This checklist must be completed and maintained in the event that occupational exposure occurs.

	ACTION TO BE TAKEN BY EMPLOYER	COMPLETION DATE
<input type="checkbox"/>	Required incident documentation has been provided to affected employee(s)	
<input type="checkbox"/>	Exposure source individual has been identified	
<input type="checkbox"/>	Arranged for affected employee to see healthcare professional	
<input type="checkbox"/>	Required documentary information has been sent to the healthcare professional	

DISCIPLINARY PROGRAM

Purpose

The purpose of this program is to establish disciplinary action procedures that encourage compliance with REFLECTIONS GLASS & MIRROR, INC safety programs and other safety & health efforts made by REFLECTIONS GLASS & MIRROR, INC.

Scope

This program applies to all REFLECTIONS GLASS & MIRROR, INC work sites and employees regardless of employment duration or position within REFLECTIONS GLASS & MIRROR, INC.

Responsibilities

Safety Manager

- Responsible for the implementation and enforcement of this program.
- Ensure that disciplinary actions are adequate enough to ensure program effectiveness.
- Be conduct disciplinary action procedures in accordance with this program.

Supervisors

- Assist the safety manager in enforcing this program.
- Ensure that employees are aware of what constitutes a safety violation and follow on actions.
- Report all safety violations to the safety manager who will determine what action items should follow the violation.
- Support the safety manager in disciplinary action procedures.

Employees

- Comply with all parts of this program.
- Help prevent incidents by reporting safety violations to your supervisor.
- Formally report any disciplinary / corrective actions that you believe are unfair or discriminatory to your supervisor immediately.

* Physical inspections of work areas will be performed regularly by REFLECTIONS GLASS & MIRROR, INC officials who will report suspected safety violations where applicable.

Requirements

Employee safety is extremely important to the owners and management of REFLECTIONS GLASS & MIRROR, INC. Not following safety rules or procedures in considered unacceptable and complying with REFLECTIONS GLASS & MIRROR, INC safety programs, rules and procedures is mandatory. Safety violations include but are not limited to:

- Intentional disregard of safety rules, procedures or guidelines required by REFLECTIONS GLASS & MIRROR, INC or its clients
- Horseplay or other actions that compromise safety and health
- Non-compliance with PPE program requirements or other written REFLECTIONS GLASS & MIRROR, INC requirements
- Using or possessing alcohol or illegal drugs during work hours or on REFLECTIONS GLASS & MIRROR, INC premises
- Possessing firearms or other weapons while on REFLECTIONS GLASS & MIRROR, INC premises
- Not reporting incidents as required by REFLECTIONS GLASS & MIRROR, INC
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

- Harassing, threatening or otherwise putting the health and safety of other employees at risk.

Procedure

The following disciplinary action procedures shall be applied after a safety violation notice has been issued:

- 1st Safety Violation: The first safety violation will result in a verbal warning. However, a copy of the safety violation notice shall be issued and kept on record for the duration of the employee's employment. The supervisor or safety manager shall inform the employee of which safety rules or procedures were violated and recommend corrective actions or actions to prevent re-occurrence. The employee's direct supervisor and or other applicable persons shall also be notified of the violation and shall receive a copy of the safety violation notice.
- 2nd Safety Violation: The second safety violation shall result in a written disciplinary action form and possible training on the safety violation subject matter. The disciplinary action form shall include the issue date, name and signature of employee, name and signature of supervisor, violation number, violation description and disciplinary / corrective actions which were taken or are to be taken.
- 3rd Safety Violation: The third safety violation shall result in another disciplinary action form but must include temporary layoff for a duration which shall be determined in collaboration between the safety manager, supervisor and / or other applicable personnel. The severity of the violation is to be considered when disciplinary action is applied.
- 4th Safety Violation: The fourth safety violation shall result in termination of employment unless there is a compelling reason to retain the employee which is to be determined by the safety manager, supervisor and other applicable personnel.

* The affected employee may submit a written rebuttal at anytime before, during or after the disciplinary period.

* Safety violations shall expire 12 months after the date of occurrence.

* All disciplinary actions are subject to change based on the severity or degree of negligence. For example, if an employee physically harms another employee, intentionally commits an unsafe act that results in harm, potential harm, damage or potential damage that places REFLECTIONS GLASS & MIRROR, INC or its employees at significantly higher level of risk or results in losses that are considered serious; the employee could be terminated without having multiple safety violations. Therefore, the degree of disciplinary action will often be determined on a case-by-case basis and will vary depending on the violation severity or effects of the violation.

Recordkeeping

All safety violation documentation shall be kept on file for 2 years after his or her employment is terminated. In cases where the disciplined or terminated employee claims discriminatory or unfair disciplinary / corrective action or termination; the employee's entire employee file (including all safety violation documentation) shall be kept for 3 years after his or her employment is terminated.

WARNING!
Safety Violation Notice

Issue Date: _____

Employee Name: _____

Supervisor Name: _____

Department: _____

Violation No: _____

Violation Description: _____

Issued by: _____

Employee Signature: _____

Supervisor Signature: _____

Safety Violation / Disciplinary Action Form

Issue Date:	Issued By:	Issued To:	Department:	Violation No:
Violation Description:				
Disciplinary / Corrective Actions:				
Additional Comments:				

Employee Signature: _____

Supervisor Signature: _____

DRIVING SAFETY

Purpose

The purpose of this program is to provide managers, employees and their supervisors with the regulatory requirements necessary for compliance for operation, management and safety of REFLECTIONS GLASS & MIRROR, INC vehicles.

Key Responsibilities

REFLECTIONS GLASS & MIRROR, INC's safety manager is in charge of ensuring that the details of this program are followed by all employees; the outline for the driving safety program shall be stored in the office of the safety manager.

REFLECTIONS GLASS & MIRROR, INC's site manager is responsible for the application and follow-through of this program on site, while making sure that vehicles conform to the outlined plan.

In addition to being knowledgeable in the general procedures outlined in REFLECTIONS GLASS & MIRROR, INC's vehicle safety policy, employees are responsible for adhering to said policies and for reporting any unsafe vehicle conditions.

Only authorized employees shall operate on and off-road motor vehicles.

Vehicle and Transportation Related

Safe Driving Practices

In order to drive a particular REFLECTIONS GLASS & MIRROR, INC or client vehicle, employees must possess a valid driver's license for that particular vehicle, have prior authorization to drive a REFLECTIONS GLASS & MIRROR, INC-owned vehicle, possess at least three years of experience operating that type of vehicle and received recent evaluation and training for that vehicle.

In addition to these practices, the following rules must be followed:

- Reversing a vehicle is forbidden in most circumstances, as drivers should make every effort to park a vehicle so that they can drive forward when leaving,
- Ensure that vehicles are of correct size and designed for the intended use,
- All storage areas within a vehicle are to be free of any loose materials, in case of an accident,
- Any open cargo holds should be covered with a net or netting equivalent,
- No alterations shall be made to vehicles without prior authorization from the vehicle's manufacturer,
- Any signs or stickers placed on the vehicle should not impair the driver's field of vision or operation of the controls.

Employees driving vehicles are required to follow safe driving practices:

- All laws, both local and federal, must be followed along with any client requirements,
- Always stay focused on the road and keep both hands on the wheel,
- Drive defensively, so that conditions and potential hazards are being continually assessed,
- No electronic devices may be used while operating a vehicle. The vehicle must be parked for a driver to use a cell phone or two-way radio,
- Posted speed limits shall never be exceeded,
- Any traffic warnings, citations, collisions, near-collisions or vehicle damage must be immediately reported to the supervisor,
- Any changes to an employee's driving status must be reported to the supervisor,
- Seat belts must be worn by all passengers while the vehicle is moving; passengers may only use seats that

- are equipped with the proper seatbelt (three-point inertial-reel model belts),
- Drive slowly upon entering construction areas and in areas where encounters with large vehicles or wildlife are likely,
- Drive cautiously in hazardous driving conditions like rain, snow, fog or sleet. If necessary, drive for the conditions and under the recommended speed limit,
- Employees are forbidden to drive under the influence of alcohol, illegal drugs, or prescription and over-the-counter medications that may inhibit their driving. Also, alcohol and illegal drugs should never be in leased or REFLECTIONS GLASS & MIRROR, INC or client owned vehicles.

Drivers are to be prepared before leaving:

- The driver must be well-rested and fully alert in order to operate a REFLECTIONS GLASS & MIRROR, INC vehicle,
- Drivers should check their vehicle for damages and immediately report any new damage to the supervisor,
- Check for windshield damage that might impair the driver's field of vision,
- Remove all dirt, snow and ice from the vehicle's lights and windows so that there is nothing blocking the driver's view,
- Make sure there is enough fuel in the gas tank to reach your destination. Other than adding fuel and other necessary fluids, drivers are not permitted to perform any kind of maintenance or repairs,
- Check the license plates and inspection tag on the automobile to ensure that both are current,
- Double check to make sure that REFLECTIONS GLASS & MIRROR, INC vehicle is equipped with a first-aid kit and an inspected fire extinguisher.

Vehicle Requirements:

- All vehicles will be maintained in safe working order,
- Any vehicle weighing less than 1000 kg is not allowed on public roads,
- Vehicles with a restricted rear view (such as a fully loaded pickup truck) or that are longer than 20 feet (6 meters) must be equipped with an audible reversing alarm,
- Every seat must have a head-rest,
- Every light-duty vehicle, including buses, must come with adjustable left, right and center rear view mirrors,
- All loads must be secured and are not to exceed either the manufacturer's specs or the legal limit for the automobile,
- All vehicles will have rollover protection installed, in compliance with the industry standard regulatory practices,
- Every light equipment vehicle must be equipped with two high-intensity lights. These high-intensity lights must be located as high, as far apart and as far back as possible. The lights will be wired to the headboard switch, and will have their own override switch, should local regulations allow it.

Regarding Tires:

- Tires must be of the same make, model and tread patterns. The only exception to this rule is when the automobile or tire manufacturer recommends a different type of tire for particular axles,
- The vehicle's equipped tires are the ones recommended by the automobile or tire manufacturer,
- All vehicles must carry a spare tire and the equipment necessary to safely change a tire.

All vehicles must come equipped with:

- A fire extinguisher that has a capacity of least 0.9 kg or 2 lbs,
- The fire extinguisher must be mounted securely in a location that is easily accessible in case of an emergency, and where it won't become a hazard itself in case of an accident,
- A first-aid kit that is stored in a safe and secure place,

- A high-visibility jacket to use if there is an emergency,
- At least one hazard warning triangle.

Transportation

- Whenever an employee is assigned to drive a REFLECTIONS GLASS & MIRROR, INC vehicle, REFLECTIONS GLASS & MIRROR, INC must make sure that the driving conditions, including the roads, weather and traffic, are safe for the employees,
- Before an employee can drive a REFLECTIONS GLASS & MIRROR, INC vehicle, the employee must ensure that the vehicle has been properly inspected,
- Both drivers and passengers must be wearing seat belts while the vehicle is in motion,
- Passengers must be seated and all body parts must remain inside the vehicle at all times, unless doing so is essential to an employees work and then, only if the worker is properly restrained,
- Tools and other materials must be securely stored inside of a compartment to prevent injury to the driver or passengers.

EMERGENCY ACTION PLAN

Purpose

The purpose of REFLECTIONS GLASS & MIRROR, INC's emergency action plan is to establish requirements for responding to any kind of emergency, which would result in employee injury or illness.

Scope

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

Responsibilities

The REFLECTIONS GLASS & MIRROR, INC Emergency Coordinator shall be responsible for:

- Ensuring each location has a dedicated emergency action plan
- Ensuring that each site has its' own dedicated emergency coordinator
- Ensuring that emergency drills are conducted for each permanent site at least annually
- Ensuring that inspections and corrective actions are performed for each site at least monthly

Site Emergency Coordinators shall:

- Train all site employees on emergency action
- Ensure employees are trained on proper fire extinguisher use
- Conduct monthly inspections of site to ensure compliance with fire safety and emergency requirements
- Report to REFLECTIONS GLASS & MIRROR, INC Emergency Coordinator regarding all non compliance issues

General Requirements (See Procedures in The Site-Specific Emergency Action Plan Template in Appendix 1)

The following requirements shall be met in order to maintain compliance with REFLECTIONS GLASS & MIRROR, INC and regulatory fire safety and emergency safety requirements.

- The site specific emergency action plan shall be available to all employees for review and shall include procedures for reporting a fire or other emergency.
- Each emergency action plan shall have procedures for emergency evacuation, reporting fires & other emergencies
- Each emergency action plan shall include procedures to account for all employees after the evacuation
- Contact information shall be provided to employees who need additional information pertaining to the plan or to their respective duties
- Each site will have a system in place to alert employees
- Each site emergency coordinator shall review the emergency action plan with employees
- No employee may remain onsite during and emergency to operate critical operations (not permitted)
- Upon arriving to the designated safety area (outlined in the site-specific safety plan), a head count shall be performed to ensure that all employees are accounted for.
- Contact information shall be made available to employees who need additional information regarding the plan or their specific duties.
- Our emergency action plan shall be reviewed when; the plan is developed or the employee is assigned initially to a job, the employees' responsibilities under the plan change or when the plan itself is changed.
- REFLECTIONS GLASS & MIRROR, INC shall ensure that the alarm system is distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan.

List of Emergency Types

Potential emergency types shall be addressed in each site specific emergency action plan and shall include procedures for:

- Fires or Explosions
- Release of hazardous gases or chemical substances
- Bomb or Terror Threats
- Health / Medical Emergencies
- Workplace Violence
- Natural Disasters

Emergency Equipment

Each site shall have a detailed list within its site-specific emergency action plan that outlines emergency equipment requirements. Unless otherwise determined by the site emergency coordinator, each site will have a minimum of the following emergency equipment items:

- 1 First Aid Kit for every 20 employees
- Emergency exit signs and lighting as required by local fire codes
- Portable fire extinguishers which are properly mounted and marked so they are easily identified
- Alarms and other required audible emergency sounding devices

Training & Education

REFLECTIONS GLASS & MIRROR, INC shall facilitate emergency action and evacuation training to ensure that employees understand the emergency and evacuation procedures applicable to their specific site. Training shall include the safe and orderly evacuations of other employees.

Records & Documentation

Each site shall maintain all training and / or other documentation related to its' site for at least 5 years.

Appendix

1. Site-Specific Emergency Action Plan Template

FALL PROTECTION

Purpose

The purpose of this program is to establish requirements for working at heights, which exceed or are equal to the fall protection requirement height threshold and where guard rails, safety nets or other engineering controls are not present. Because REFLECTIONS GLASS & MIRROR, INC could work on both general industry, construction or other industry sites; the fall protection requirement height threshold will vary. Therefore, the fall protection requirement height shall be determined by the industry list below and the corresponding fall protection requirement height thresholds.

Important Note: OSHA requires that fall protection be provided at elevations of 4 feet or more in general industry workplaces, 5 feet or more in shipyards, 6 feet or more in the construction industry and 8 feet or more in longshoring operations. In addition, OSHA requires that fall protection be provided when working over dangerous equipment and machinery, regardless of the fall distance. Therefore, threshold heights & requirements will vary depending on the type of job being performed. Please refer to 29CFR for detailed specifications.

Additional Note: Some states have state specific fall protection criteria which REFLECTIONS GLASS & MIRROR, INC must comply with. Therefore, it is the safety manager's responsibility to determine when state specific fall protection requirements conflict with Federal OSHA requirements and to establish fall protection criteria for that site's fall protection plan.

Scope

This program applies to all REFLECTIONS GLASS & MIRROR, INC employees who work on surfaces, which are at or above the fall protection requirement height threshold from the next lower level; including excavations.

Responsibilities

Safety Manager

- Ensure each site uses a fall protection plan which accounts for site specific hazards and conditions
- Ensure that other applicable personnel are trained to use fall protection systems and personal fall arrest systems where applicable.

Managers & Supervisor

- Ensure that no employees work at heights, which are at or above the fall protection requirement height threshold without using proper fall protection measures.
- Ensure that employees who use PFAS's are trained on how to use the systems.
- Attempt to use engineering controls such as guardrails or safety nets before PFAS whenever possible.
- Ensure that a competent person inspects all work areas, which are at or above the fall protection requirement height threshold to ensure proper controls are in place.

Employees

- Do not work at heights at or above the fall protection requirement height threshold unless you are trained and confident in the fall protection that is protecting you from falls.
- Report all unsafe conditions to your manager or supervisor.
- Think about your safety and the safety of those around you before you access a working surface that exceeds the fall protection requirement height threshold.

General Requirements

Anytime a REFLECTIONS GLASS & MIRROR, INC employee intends to work at or above the fall protection threshold height, guardrails, safety nets, personal fall arrest systems or other approved fall protection systems shall be used. Fall protection requirement height thresholds depend solely upon the nature of the site or client location and shall be used in accordance with the following industry criteria list:

- Non-Construction Environments: 4 feet or more
- Construction Environments: 6 feet or more
- Shipyards: 5 feet or more
- Longshoring Environments: 8 feet or more

Site Specific Fall Protection Plan

Whenever site-specific fall protection plans are utilized; the plan may only be developed by the competent person. The plan must also take into account the site-specific requirements which initially called for the use of a site-specific fall protection plan.

Whenever conventional fall protection is not feasible or creates a greater hazard than the fall itself; a fall protection plan may be used. In these cases, the site-specific plan shall include the reason why conventional fall protection methods are not feasible, the locations of the areas where conventional fall protection is not feasible. These areas shall also be classified as “controlled access zones”.

Fall Protection Equipment

All fall protection equipment shall meet the requirements of applicable ANSI, ASTM, or OSHA requirements.

Rescue

In the event of a fall, REFLECTIONS GLASS & MIRROR, INC shall ensure prompt rescue of the affected employee(s). REFLECTIONS GLASS & MIRROR, INC shall ensure that rescue details are established prior to the commencement of work at elevated heights.

Incident Investigations

In the event of a fall, near miss, or other serious incident; REFLECTIONS GLASS & MIRROR, INC shall conduct a thorough incident investigation and shall maintain all incident investigation records for at least 10 years after the affected employee(s)’ employment has been terminated.

Training Requirements

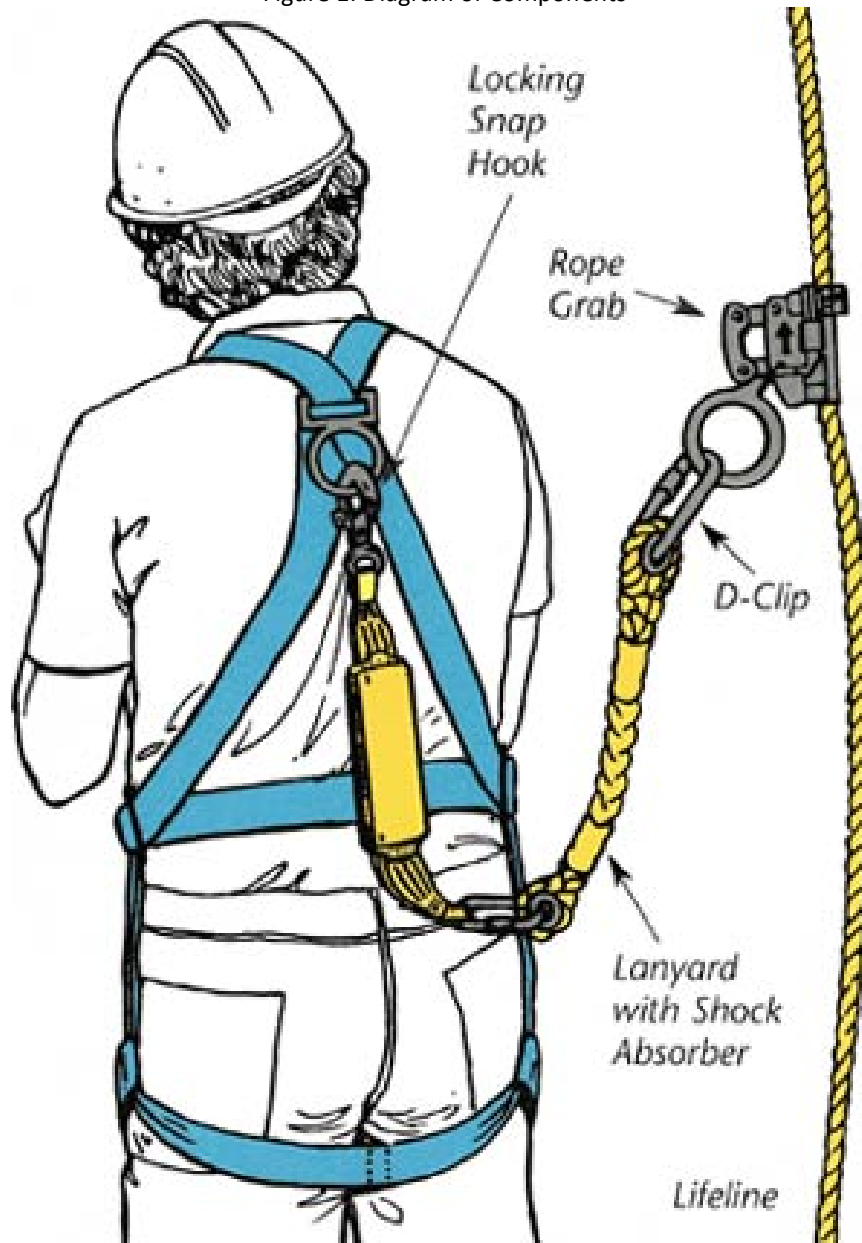
All employees who work at or above the fall protection requirement threshold shall receive training which pertains to the recognition elimination of fall hazards.

Employees who have already received training, shall receive re-training either on an annual basis, whenever the employee demonstrates incompetence or whenever the employee requests to be re-trained.

Records & Documentation

All training shall be documented and records shall be maintained for at least 3 years after the termination of the employees employment with REFLECTIONS GLASS & MIRROR, INC.

Figure 1: Diagram of Components



FIRE PREVENTION/ EXTINGUISHERS

Purpose

This program is designed to provide procedures to ensure that fire extinguishers work properly and employees know how to operate the extinguishers safely in the event of a fire.

Scope

This program's scope encompasses all employees at all locations.

Responsibilities

Safety Manager

- Develops procedures for the use and maintenance of fire extinguishers,
- Devises training programs that teach the proper use of these devices.

Manager

- Implements fire extinguisher training at the manager's designated location.

All Employees

- Follow the provisions of the training manual.

Procedure

Selection and Distribution

Portable fire extinguishers are provided for use by employees. These fire extinguishers vary in class based on the type of fire they are made to extinguish, the size of the fire, and the degree of hazard that affects the use of the extinguisher.

The class of fire extinguishers used by REFLECTIONS GLASS & MIRROR, INC are as follows:

- Class A Fire Extinguishers: Used on common combustibles or fibrous materials such as wood, cloth, paper, rubber and some plastics. The distance from employees to any fire extinguisher must not exceed 75 feet (22.9 m),

Fire Extinguisher Labels

- Fire extinguishers are mounted in locations that can be easily accessed by employees, are no more than 75 feet from any employee, and are identified by a sign reading, "Fire Extinguisher",
- Fire extinguishers will not be blocked, even on a temporary basis, by equipment, boxes or products,
- A unique number will be assigned to each fire extinguisher.

Maintenance

- All fire extinguishers must be mounted no higher and no lower than four feet from the floor,
- Must be numbered to identify their designated location,
- Must be fully charged and operable,
- Must be clean and free of defects,
- Must be accessible at all times.

Inspection, Maintenance and Testing

- All fire extinguishers shall be inspected on an annual basis,

- Certified staff from a fire extinguisher dealer will perform an annual maintenance check on all fire extinguishers,
- Certified staff will inspect and recharge fire extinguishers after use,
- In the event a fire extinguisher shows a loss of pressure during the monthly inspection, certified staff will inspect and recharge the fire extinguisher,
- Completed fire inspection logs are to be maintained in the safety files for five years.

Use

- In the event of a fire, an employee will get the nearest appropriate fire extinguisher for use on the burning materials and will attempt to put out the fire,
- All other employees in the area will prepare to evacuate the area of the fire, if necessary,
- Other employees in the building will be notified of the fire,
- A standard fire extinguisher empties in 10-15 seconds. All employees must leave the area at this time, even if the fire is not out.

Training and Education

This section establishes the training procedures required for understanding fire extinguishers, their proper use and incipient-stage firefighting. Training is required prior to initial assignment and on an annual basis thereafter.

- The safety manager will conduct training involving a demonstration of the use of a fire extinguisher, without the actual discharge of the unit.

New employees will undergo training upon hire.

Initial Training Outline

- General fire principles and fire extinguishers,
- Hazards of fires in the beginning stages,
- When to evacuate the area of a fire,
- Hazards of fire extinguisher use,
- Proper use of a fire extinguisher.

Retraining

- Establishes employee proficiency and provides updated information on control procedures,
- Is provided for all authorized and affected employees on an annual basis, in the event of a change in job assignment, when knowledge of policies is found to be insufficient or when REFLECTIONS GLASS & MIRROR, INC determines that there have been deviations from established policies.

Training Documentation

- All training will be documented with the results of each employee's performance on a hands-on test,
- Documentation shall include the name of the employee, name of the trainer, date of training and an outline of the training provided.

FIRST AID

Purpose

The program outlined in this document has been implemented to ensure adequate amounts of first aid equipment and supplies are available for employees and to put in place proper procedures for situations requiring first aid.

Scope

This program specifically applies to all of our employees regardless of where they are performing work unless otherwise notified by the safety manager and documented on the site-specific plan.

Responsibilities

Safety Manager

- Implement and ensure the requirements of this program are followed at all times,
- Will work in conjunction with The Red Cross or other applicable entities to make sure employees are up-to-date on applicable training requirements,
- Keep all records pertaining to this program in order and current.

Supervisors

- Ensure that first aid kits are made available and adequately stocked for each work site,
- Will make sure that provisions for prompt medical attention, including transportation in case of a serious injury, are in place before a project begins,
- Will provide adequate first aid supplies and equipment within easy reach when required,
- Ensure that access to emergency and medical phone numbers is available in a conspicuous place to all employees.

Employees

- Will follow the requirements of this program where applicable,
- Will use first aid supplies and equipment responsibly,
- Immediately notify the supervisor of any low first aid kit supplies,
- Know the location of emergency telephone numbers.

Requirements

First Aid Supplies and Equipment

First aid supplies and equipment must be available and easily accessible to employees at all times.

First aid kits will contain all appropriate items determined to be adequate for the environment in which they will be used.

First aid kits will be assessed periodically to ensure adequate amounts of first aid supplies are always available. Inadequate first aid kits must be reported to your immediate supervisor who will then have the kits restocked with adequate supplies prior to the start of the work shift.

The site supervisor shall perform an inspection of the first aid supplies on a weekly basis. Kits shall be replenished as needed by the site supervisor.

A safety shower, eye wash, and/or other suitable facilities for quick drenching or flushing shall be provided within the work area of any facility where the eyes or body of any person may be exposed to injurious corrosive

materials. Ensure expiration dates are checked for safety reasons and that the water used in storage devices is sanitized.

An assessment of the material or materials used shall be performed to determine the type of flushing/drenching equipment will be required at the job site. Portable or temporary stations must be set up prior to the use of corrosive materials on all client job sites.

Medical Response

All minor first aid is to be self-rendered. Because of the risks associated with certain blood-borne pathogens, no one is allowed to tend the minor injuries of another person.

A person who has a valid certificate in first-aid shall be available to render first aid, in the absence of an infirmary, clinic, hospital, or physician that is reasonably accessible in terms of time and distance to the worksite. It is mandatory that a valid certificate in first-aid training must be obtained from the U.S. Bureau of Mines, The American Red Cross or an equivalent training authority which can be verified by documentary evidence.

Universal precautions must always be observed when first aid is rendered by authorized employees with the proper training. (Universal Precautions means that the aid giver treats all bodily fluids as if they were contaminated).

If 911 is not available refer to the list of posted phone numbers for prearranged medical response providers. All authorized first responders of REFLECTIONS GLASS & MIRROR, INC should have a cell phone as a means of communications; otherwise hand held radios or telephones shall be used as a means of communication.

Transportation

Based on the first responders' assessment of the injuries involved, decide what type of treatment will be performed and the location of the treatment (emergency room, occupational medicine provider, or on-site first aid).

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

Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service should be available at all times.

Choices to consider for proper transport include: private automobile, REFLECTIONS GLASS & MIRROR, INC vehicle, helicopter, crew boat, EMS vehicles including medi-vac helicopters, or any other transportation that can provide safe transportation to the hospital or doctor's office in order to provide medical attention to the injured in the quickest manner without the injured employee incurring any additional complications or injuries.

Transportation needs must be preplanned and coordinated with the transportation provider prior to an incident requiring such service.

Training

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

FORKLIFT SAFETY

Purpose

The purpose of this program is to establish general rules and safe operating procedures for using Powered Industrial Trucks (forklifts).

Scope

All REFLECTIONS GLASS & MIRROR, INC employees operating a forklift in the performance of their job duties and assignments will adhere to the rules and procedures set forth. This document covers REFLECTIONS GLASS & MIRROR, INC employees and contractors and shall be used on REFLECTIONS GLASS & MIRROR, INC premises. In addition, these guidelines are to be followed in the event an operator's program is either not in place, or less stringent.

Responsibilities

Managers & Supervisors

- Will establish the competency of each forklift operator, by ensuring they successfully complete the training and evaluation process,
- Will ensure that all forklifts undergo inspection before each shift begins and any necessary repairs are performed before the forklift is operated.

Employees

- Shall be current on applicable training,
- Will operate the forklift according to established standards and manufacturer requirements,
- Must inspect the forklift before their shift begins. If defects are found, they will remove the forklift from operation until all problems are corrected,
- Will operate the forklift in a safe manner at all times.

Requirements

All approved forklifts must have a manufacturer's identification plate attached clearly showing all specifications of the forklift. It must also show the forklift is accepted by a nationally recognized testing laboratory.

Only persons 18 years of age who has completed required training shall operate forklifts.

Only employees who have been properly trained are allowed to operate the forklift equipment in which they have been properly qualified to use.

Any modifications or additions affecting the capacity and safe operation of the forklift cannot be performed without prior written approval by REFLECTIONS GLASS ownership. If modifications or additions are performed, all capacity, operation, and maintenance instruction plates, tags, or decals shall be changed to reflect this.

If the forklift is equipped with front-end attachments other than those installed by the factory, the supervisor will make sure the forklift is marked to identify the attachments and to show the approximate weight of the forklift and attachment combination at maximum elevation with load laterally centered.

The operator shall ensure all nameplates and markings are in place and are maintained in clear, legible condition.

All forklifts **MUST** be equipped with safety seat belts. In addition, all forklifts must be equipped with a horn, backup alarm, beacon light, headlights and taillight.

All forklifts must be fitted with an overhead rollover cage in accordance to the manufacturer's specifications.

The forklift will be equipped with a vertical load backrest extension, following the manufacturer's guidelines if the type of load presents a hazard to the operator.

Training & Education

Training shall be carried out by a qualified person using a combination of teaching methods (e.g., lecture, discussion, interactive computer learning, video tape and written material), practical training (as properly demonstrated by the trainer along with the practical exercises being performed by the trainee) and observation and evaluation of the operator's performance in the workplace.

All operator training and evaluation will be conducted by qualified persons who have the knowledge, documented training, and experience to both train and evaluate a forklift operator to establish competency.

Each operator will be re-evaluated every 3 years to ensure their continued ability to operate a forklift.

Training shall include the following topics, except in topics for locations where they are not applicable to safe operation of the truck due to type of equipment or facility conditions:

- Operation instructions, warnings, and precautions for each types of truck the employee will be authorized to operate,
- Differences between the truck and the automobile,
- Forklift controls and instrumentation: their location, their purpose, and their function,
- Engine or motor operation,
- Steering and maneuvering,
- Visibility (including visibility due to load restrictions),
- Fork and attachment adaptation, operation, and use limitations,
- Vehicle capacity,
- Vehicle stability,
- Vehicle inspection and maintenance procedures that must be performed by the operator,
- Refueling and/or charging and recharging of batteries,
- Operating limitations,
- Any other operation instructions, warnings, or precautions listed in the operator's manual for the type of vehicle that the employee will be operating,
- Surface conditions where the vehicle will be operated,
- Load composition and load stability,
- Load manipulation, stacking, and unstacking,
- Maintaining awareness of pedestrian traffic in areas where the vehicle will be operated,
- Narrow aisles and other restricted places in the vehicle operation areas,
- Identification of hazardous (classified) locations where the vehicle will be operated,
- Ramps and other sloped surfaces that could affect the vehicle's stability,
- Identify areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust,
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation, and

Mandatory refresher training must be provided in the following instances:

- When unsafe operations are observed,
- After an incident,
- If operating a different vehicle type,
- Changes in conditions or,

- Any time REFLECTIONS GLASS & MIRROR, INC feels an operator requires refresher training.

Operations

General

- All operators shall wear a safety seat belt while operating the forklift,
- Forklifts shall not be driven up to anyone standing in front of a bench or other fixed object,
- No person shall be allowed to stand or pass under the elevated portion of any forklift, whether loaded or empty,
- Unauthorized personnel shall not be permitted to operate forklifts,
- No riders or passengers are permitted,
- It is prohibited for arms or legs to be placed between the uprights of the mast or outside the running lines of the forklift,
- When a forklift is left unattended or not in use, the forks shall be fully lowered, controls will be neutralized, power shall be shut off, and brakes must be set,
- The wheels must be blocked if the forklift is parked on an incline,
- A forklift is considered unattended when the operator is 25 ft. or more away from the vehicle, which remains in view, or whenever the operator leaves the forklift and it is not in view,
- When the operator of a forklift is dismounted and within 25 ft. of the forklift still in view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement,
- A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform or freight car,
- Never use the forklift to open or close freight doors,
- Brakes shall be set and the wheels blocked to prevent movement of trucks, trailers, or railroad cars while loading or unloading,
- Fixed jacks may be necessary to support a semi-trailer during loading or unloading when the trailer is not coupled to a tractor,
- Trucks, trailers, and railroad cars shall be checked for breaks and weakness in the flooring before they are driven onto. There must be sufficient clearance above overhead installations, lights, pipes, sprinkler system, etc.,
- An overhead guard (cages) must be used as to protect the operator from falling objects,
- An overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling heavy capacity load,
- Fire aisles, access to stairways, and fire equipment shall be kept clear at all times.

Traveling

- The operator must slow down and sound the horn at cross aisles and other locations where their vision is obstructed,
- If the load being carried obstructs forward view, the operator shall be required to travel with the load trailing,
- The operator shall be required to look in the direction of, and keep a clear view of the path of travel,
- Grades shall be ascended or descended slowly,
- When ascending or descending grades in excess of 10 percent, loaded forklifts shall be driven with the load upgrade,

- On all grades the load and load engaging means shall be tilted back if applicable, and raised only high enough to clear the road surface,
- The forklift shall always be operated at a speed that will permit it to be stopped in a safe manner.
- Stunt driving and horseplay are expressly prohibited,
- The operator shall slow down for wet and slippery floors,
- Dock board or bridge plates must be properly secured before they can be driven over,
- Dock board or bridge plates must be driven over carefully and slowly and never exceed the rated capacity,
- While negotiating turns, speed shall be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion,
- Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.

Loading

- Only stable, safely arranged loads will be handled,
- Use extreme caution when handling off-center loads that cannot be centered,
- Only handle loads within the forklift's rated capacity,
- Forklifts equipped with attachments shall be operated as partially loaded forklifts when not handling a load,
- A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load,
- Extreme care shall be used when tilting the load forward or backward, especially when high tiering,
- Tilting forward with load engaging means elevated is prohibited unless picking up a load,
- An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack,
- Use only enough backward tilt to stabilize the load when stacking or tiering.

Operation of the Truck

- If at any time a forklift is found to be in need of repair, defective, or in any way unsafe, the forklift must be taken out of service until safe operating condition has been restored,
- Never fill the fuel tanks with the engine running,
- Spillage of oil or fuel must be washed away or completely evaporated and the fuel tank cap replaced before restarting engine,
- When fueling with Liquefied Petroleum Gas (LPG), precautions and handling requirements set forth in the "Safe Handling of LPG" program must be followed,
- No forklift will be operated with a fuel system leak,
- Open flames shall not be used for checking proper fluid levels in storage batteries or fuel tanks,
- Operator must verify trailer chocks, supports, and dock plates are secured prior to loading/unloading.

Maintenance and Inspection of Forklifts

- Only authorized personnel shall perform maintenance and make repairs,
- Repairs to the fuel and ignition systems of forklifts shall be performed only in locations designated for such repairs,
- Forklifts in need of repairs to the electrical system must have the battery disconnected prior to such repairs taking place,

- Only equivalent parts to those of the original design shall be used in the replacement of any forklift requiring repair,
- Forklifts shall not be altered so the positions of the various parts are different from what they were when originally received from the manufacturer, nor shall they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts,
- Any counter weighting of fork trucks shall not be done unless approved by the manufacturer,
- Forklifts shall be inspected daily by the operator before being placed in service, and shall not be placed in service if the inspection shows any condition adversely affecting the safety of the forklift,
- Inspection shall be made at least daily – prior to each shift (visual – non-documented). Inspection items shall be clearly posted on each forklift. Operators must ensure the vehicle is safe prior to operating,
- Forklifts used on a round-the-clock basis must be inspected before each shift begins,
- Defects shall be immediately reported to the supervisor and corrected before the forklift can be operated,
- When any part of the forklift exceeds its normal operating temperature, thus creating a hazardous condition, the forklift shall be removed from service and not returned to service until the cause for its overheating has been eliminated,
- Forklifts shall be kept in a clean condition, free of lint, excess oil, and grease,
- Noncombustible agents should be used for cleaning trucks,
- Low flash point (below 100 degrees F.) solvents should not be used,
- High flash point (at or above 100 degrees F.) solvents may be used if the necessary precautions regarding toxicity, ventilation, and fire hazard are mitigated with the agent or solvent used.

GENERAL SAFETY

Purpose

This program is written to ensure compliance regarding local regulatory and general safety requirements related to the operation and management of all REFLECTIONS GLASS & MIRROR, INC facilities. Furthermore, this program provides directives and guidelines to managers, supervisors and employees regarding their specific responsibilities.

This program applies to all regular employees, temporary employees, and any contractors working on REFLECTIONS GLASS & MIRROR, INC premises. In addition, for any off-site work, these guidelines are to be followed in the event an operator's program is either not in place, or is less stringent.

Key Responsibilities

Safety Manager

- The Safety Manager is responsible for developing and maintaining the General Safety Requirements program, and will keep these procedures in the designated safety manager's office.

Site Manager

- The site manager is responsible for enforcing and maintaining the safety plan and ensuring everything required for compliance is available at all times.

Employees

- Every employee shall be familiar with the workplace General Safety Requirements program of REFLECTIONS GLASS & MIRROR, INC,
- Must abide by the requirements laid forth and report all unsafe conditions to their immediate supervisor and/or the Safety Manager,
- Will use all safeguards, safety appliances, and personal protective equipment made available to them in order to follow the safe work practices and procedures of their workplace.

Competency and Training

All workers will be proficient in the operation of equipment in the performance of their assigned job tasks. A competent worker is someone who is sufficiently qualified, trained, and experienced enough to safely perform their job either without supervision, or with only a minimal degree of supervision. Any work that might endanger an employee must be performed by a qualified worker or by a worker who is under the direct supervision of a worker who is competent in the assigned job task. All workers must be trained in the procedures for each job they are required to perform until they become proficient in each task or skill. Only qualified workers who have been properly trained and experienced will be permitted to operate equipment.

Training must include:

- Procedures to be followed in the event of a fire or other emergency,
- The location of first aid facilities,
- The identification of all prohibited or restricted areas,
- Precautions to be taken in order to protect the worker against any physical, chemical or biological hazards they may come into contact with,
- Any procedures, plans, policies and programs that REFLECTIONS GLASS & MIRROR, INC is mandated to develop, and
- Anything else deemed necessary to ensure the health and safety of the worker while they are on the job.

All employees shall be instructed in both the recognition and avoidance of unsafe conditions that pertain to their specific work environments and work activities.

Inspections

REFLECTIONS GLASS & MIRROR, INC must:

- Ensure that frequent, regular inspections of the workplace, jobsites, materials, and equipment are performed by a competent person,
- Ensure that all work processes and procedures are examined in order to identify any risk to the safety or health of any person at the workplace,
- Investigate every dangerous occurrence or incident as soon as is reasonably possible.
- Ensure that all identified risks and unsafe conditions will be corrected as soon as is reasonably practicable and, in the interim, take immediate steps to protect the safety and health of any person who may be at risk.

General Facility Requirements

Housekeeping

Each work site shall be kept clean and free from materials or equipment that could cause workers to slip or trip. All surfaces used by any worker shall be clear of obstructions, hazards, and accumulations of refuse, snow or ice.

REFLECTIONS GLASS & MIRROR, INC requires that a worksite is as clean and sanitary as reasonably practicable.

Safe Equipment Maintenance

REFLECTIONS GLASS & MIRROR, INC is responsible for ensuring that work site maintenance, systems of work, and working environments are maintained properly for the health, safety, and welfare of workers while at the job site.

REFLECTIONS GLASS & MIRROR, INC will ensure all equipment is maintained at regular intervals to ensure the equipment will function safely in the way it was purposed and to be free from obvious defects. Damaged and faulty equipment reporting procedures must be in place to facilitate timely repair of all malfunctioning equipment.

Where a defect is found, REFLECTIONS GLASS & MIRROR, INC will ensure that immediate action is taken to protect the health and safety of any worker who may be at risk until the defect is corrected by a competent person.

Any machinery, tool, material, or equipment which is not in compliance with any applicable OSHA requirement is prohibited. The machine, tool, material or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or by physically removing the non-compliant object from its place of operation.

Any worker who knows or has reason to believe that equipment under their control is not in a safe operating condition shall immediately report the condition to REFLECTIONS GLASS & MIRROR, INC so repairs to the malfunctioning equipment can be made by the proper personnel.

REFLECTIONS GLASS & MIRROR, INC expressly prohibits and does not permit compressed air to be directed towards a worker for the purpose of cleaning clothing or personal protective equipment used by that worker or for any other purpose if the use of compressed air may cause contaminant dispersion into the air which may be harmful to workers.

Whenever workers are present at a worksite, REFLECTIONS GLASS & MIRROR, INC will provide adequate lighting for the health and safety of our workers to ensure all work is done properly and safely.

No worker is allowed to smoke in an enclosed place of employment, worksite or work-related area except in designated smoking areas.

Impairment

No person shall enter or remain at any workplace of employment while the person's behavior or ability to work is impaired by alcohol, intoxicating beverages, drugs or other substances so as to create a nuisance or to endanger any person, or to create an undue risk to workers, themselves or anyone else.

Improper Conduct

All workers shall engage in proper activity or behavior. Improper behavior that might create or constitute a hazard to any person is unacceptable. Improper activity or behavior includes horseplay, scuffling, fighting, practical jokes, and unnecessary running or jumping.

Industrial Hygiene

An eyewash fountain shall be provided anywhere a worker may be exposed to any biological or chemical substance hazardous in nature.

All workers who may potentially be exposed to a chemical, biological, or physical agent that may endanger their safety or health shall be trained in the necessary precautions and procedures to be followed when handling, using, and storing the agent. They will also be trained in the proper use and care of all required personal protective equipment, and in the proper use of emergency measures and procedures.

No food, drink or tobacco shall be taken into, left, or consumed in any area where any poisonous substance may be present.

Protective clothing or other safety devices that have been worn next to the skin shall be cleaned and disinfected prior to being worn by another worker.

Workers who handle or use corrosive, poisonous or other substances likely to endanger their health shall be provided with washing facilities with clean water, soap and individual towels.

Thermal Stress

The employer must provide and maintain an adequate supply of cool potable water close to the work area for the use of a heat exposed worker.

If a worker shows signs or reports symptoms of heat stress or strain, the worker must be removed from the hot environment and treated by an appropriate first aid attendant, if available, or by a physician.

All workers must wear adequate insulating clothing and personal protective equipment to protect them from the cold if their work takes place outdoors in snow or ice covered terrain. If excessive ultraviolet light, glare or blowing ice crystals may present a risk of injury to the eyes, workers must wear eye protection appropriate to the hazardous conditions.

If a worker exposed to cold shows signs or reports symptoms of cold stress or injury, the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.

HAND AND POWER TOOLS PROGRAM

Purpose

The purpose of the Hand and Power Tools Program is to establish policies and procedures for the safe operation of hand tools, power tools and other portable tools, including guarding. All hand and power tools shall be maintained in a safe working condition.

Scope

This program applies to all employees who use hand and power tools while engaged in work at REFLECTIONS GLASS & MIRROR, INC facilities and/or offsite facilities.

Responsibilities

Managers and Supervisors

Make sure that operation, maintenance and proper use of tools are fully understood by all employees,

- Train employees and provide them with all personal protective equipment (PPE) needed to safely operate portable tools.

Employees

- Will use the proper tool for each task,
- Will follow the manufacturer's recommendations on the safety and operation for the tool.

Requirements

General

All tools must be an approved type and in good condition in order to be used.

Any tool which is not in compliance with any applicable requirement of this part is prohibited and shall be identified as unsafe by tagging or locking the controls to render them inoperable.

Tools may be inspected at any time,

Any employee has the authority, and is responsibility, to remove unsafe tools from use, no matter who they belong to

Tools deemed unsafe by any employee must be labeled with a "DO NOT USE OR OPERATE" tag to prevent use of the tool.

Employees are required to always use the appropriate tool for the task at hand. Substitute tools are not allowed. Makeshift tools are strictly prohibited.

Avoid using tools containing metal around energized electrical circuits or equipment (e.g., hammers with metal handles, screwdrivers with metal in the handle, metal measuring tapes).

Throwing tools from one place to another or one person to another is prohibited. Tools must be safely carried and, if lowered from one elevation to another, must be secured in tool bags or buckets and firmly attached to hand

lines.

Tools must never be placed on unsecure, elevated surfaces.

Impact tools (e.g., chisels and punches) that become cracked or mushroomed must be dressed, repaired or replaced prior to further use.

Pipes, ground rods, drills, chisels and punches must be held with applicable holders or tongs while being struck by another employee. These must never be held with the hands.

Employees are not permitted to use shims to make a wrench fit. Wrenches with damaged or sprung jaws will not be used.

Employees may only use tools for the purposes for which they are intended.

Sharp-edged tools must be safely handled and stored to prevent injury or damage to the tool or other property. These tools will not be carried in pockets without the use of appropriate protectors to preserve the edge.

Splintered, loose or cracked wooden handles must be replaced. Taping or lashing the handle with wire is unacceptable.

Employees must not leave tools lying around where they may cause other persons to trip or fall.

Employees working on or above open grating must cover the grating with a canvas or other covering to prevent tools and parts from dropping through the grate where others are present. Alternately, the danger area below the grating may be guarded or barricaded.

The insulation on hand tools is primarily for comfort and must not be depended on to protect employees from high voltage shock. Exceptions to this are approved live line tools.

Portable Electric Tools

Metal portable electric tool parts that do not carry current (e.g. drills and saws) must be effectively grounded when connected to a source of power unless:

- The tool has approved double insulation, or
- The tool is connected to an isolated transformer or power supply.

Power tools must be inspected before each use to ensure the device is in proper working order and has all of its applicable safety devices.

Power tools may only be used as they were designed and intended to be used, according to the manufacturer's instructions. Using the tool's electrical cords for raising or lowering tools is prohibited.

Tools should be well-maintained. Power tools should be safely disconnected from the power source before adjustments or repairs are made.

Employees without a valid Hot Work Permit are prohibited from using electrical tools in hazard areas exposed to flammable vapors, gases or dusts

When using portable electric tools, ground fault circuit interrupters or an Assured Grounding Program must be in place. This requirement does not apply to equipment that runs off of portable or vehicle mounted generators at 5 kilowatts or less, those that are isolated from ground or to equipment running directly off of secondaries.

Pneumatic Tools

- Pneumatic tools must never be pointed toward another person,
- Pneumatic power tools must be secured to the hose or whip in such a way to prevent accidental disconnection of the tool from the hose,
- Pneumatic impact tools (percussion tools) must have safety clips or retainers installed and maintained to prevent accidental discharge of their attachments.

Compressed Air Tools

- Must be reduced to less than 30 psi when used for cleaning purposes and then only used with personal protective equipment (PPE) and effective chip guarding,
- Cannot be used to blow dust or dirt off clothing,
- May not be left unattended while under pressure,
- Are only to be operated by competent persons trained in the appropriate use of the tool.

Safe operating pressure, as recommended by the manufacturer, must be maintained for hoses, valves, pipes, filters and other fittings. The manufacturer recommended limits must not be exceeded.

Use of hoses for lifting or lowering tools is strictly prohibited.

Adjusting or changing air tools requires that the air is shut off at the air supply valve, ahead of the hose. Before breaking the connection, bleed the hose at the tool. This is not necessary for tools equipped with quick-change connectors.

Secure air tool connections before turning on the air pressure. The tool should be properly under control by the operator before the air is turned on.

Clamps and couplings on pressurized air hoses must be pinned with appropriate fasteners. Only approved end-fitting clamps may be used. Screw type heater hose clamps are unacceptable.

Hoses and their connections used in the conduction of compressed air to equipment must be designed for the pressure and service they are being used for. Never point a hose toward someone while blowing it down. Conductive hoses should not be used near energized equipment.

Employees are required to wear foot protection when operating impact tools (e.g., paving breakers, rotary drills, tampers, clay spades, etc.) and any other time as required by the supervisor.

Pneumatic nailers, staplers and other equipment with automatic fastener feeds that operate at 100 psi or higher pressure at the tool are required to have a safety device on the muzzle to prevent against the ejection of fasteners, unless this muzzle would be in contact with the work surface.

Airless spray guns that atomize paint and fluids at high pressures of 1,000 lbs. or more per square inch must be equipped with safety devices (automatic or manual) to prevent accidental pulling of the trigger and to prevent the release of paint or fluid before the safety device is manually released. Alternately, a diffuser nut, high velocity release and a nozzle tip guard or other equivalent protection is acceptable.

Powder Actuated Tools

Powder actuated tools are those that are activated by an explosive charge, and:

- Only qualified employees certified in the use of these tools may operate them,
- Explosive charges for these tools must be transported and carried in approved containers,
- Employees using these tools will be provided with face, eye and hearing protection.

Tools are to be maintained and serviced regularly by qualified persons. Prior to using these tools, the materials on

which the tools are to be used must be inspected to eliminate hazards and to determine the tool's suitability for the task at hand.

Prior to Use

- The operator will make sure the protective shield is securely attached to the tool,
- The operator will inspect the tool to determine that:
 - It is clean,
 - Its moving parts operate smoothly,
 - Guards and safety devices are in place,
 - The barrel is free of obstructions.
- Only qualified employees certified in the use of these tools may operate them,
- The operator must read and familiarize himself/herself with the operating guidelines and procedures as recommended by the manufacturer.

When a tool sustains damage or develops a defect during use, the employee will stop using the tool and remove it from service, as noted in this program.

Tools are not to be loaded until just before the intended firing time. Unattended tools should not be left loaded. Tools, whether loaded or unloaded, should never be pointed at another person. Tools must never be left unattended in a place where unauthorized persons may have access to the tool.

If the tool misfires, the operator will hold the tool in the operating position for at least 30 seconds. The operator will then try the tool a second time. If the tool misfires again, the operator will hold the tool in position for another 30 seconds. The operator must then remove the explosive charge with strict adherence to the manufacturer's instructions.

Fasteners must not be driven into unusually hard or brittle materials including, but not limited to, surface hardened steel, live rock, hollow tile, glazed tile, cast iron, glass block, live rock or face brick.

On the other hand, driving into easily penetrable materials should be avoided unless the materials are backed in such a way that will prevent the pin or fastener from passing completely through the material and creating a flying missile hazard on the other side.

Tools must not be used in flammable or explosive atmospheres.

Hydraulic Power Tools

Hydraulic powered tools must use fire-resistant fluids approved according to Schedule 30 of the U.S. Bureau of Mines, Department of the Interior, which will retain its operating properties at the most extreme temperatures to which it is exposed.

The manufacturer's safe operating pressures must be adhered to for hoses, pipes, valves, filters and other fittings.

When using hydraulic tools on or around energized lines or equipment, non-conducting hoses of adequate strength for the normal operating pressure must be used.

Hydraulic Jacks

Loading and Marking

- The operator must ensure that the jack being used is rated sufficiently to lift and sustain the load to which it is subjected,
- The rated load must be marked in a legible and permanent manner in a prominent location on the jack via stamping, casting or other means.

Operation and Maintenance

- If a firm foundation is not available, the base of the jack must be blocked. If there is a possibility that the cap will slip, a block must be placed between the load and the cap,
- The operator must keep an eye on the stop indicator, which must be kept clean, in order to determine the travel limit. The indicated limit must not be exceeded.
- After the load is raised, it must be secured at once,
- Antifreeze will be supplied in adequate quantities for hydraulic jacks that are exposed to freezing temperatures,
- Jacks must be well-lubricated according to the manufacturer's recommendations at regular intervals.

The operator must inspect the jack before each use. Jacks that are deemed unsafe must be tagged accordingly and taken out of use until repairs are made.

Abrasive Blast Cleaning Nozzles

Blast cleaning nozzles will have an operating valve that must be held open manually. A support will be provided to mount the nozzle on when it is not in use.

Fuel Powered Tools

Fuel-powered tools must be stopped during refueling, servicing or maintenance. Fuel must be handled, stored and transported according to the Flammable and Combustible Liquids Program.

When using fuel powered tools in enclosed spaces, the requirements for concentrations of toxic gases apply. The use of protective equipment must be adhered to.

Guarding Portable Tools

Guarding must be in place and in operating condition at all times when the tool is in use. The operator is prohibited from manipulating the guard in a manner that will compromise the integrity of the guard or the protection for which it is intended. Guarding on portable tools will meet ANSI B15.1 requirements.

Portable Circular Saws

- Portable, powered circular saws that have a blade diameter greater than 2 in. must have guards in place above and below the base plat or shoe,
- The upper guard must cover the depth of the saw's upper teeth, except for the minimum arc required to allow retraction of the guard and contact with the work surface,
- The lower guard must cover the depth of the saw's lower teeth, except for the minimum arc required to allow the retraction of the guard and contact with the work surface,
- When the tool is pulled back from the work surface, the lower guard automatically returns to the covering position
- Cracked or damaged saw blades must be removed from service.

Switches and Controls

- All hand held power tools are required to have a constant pressure switch or control and may be provided with a lock-on control that allows turnoff by a single motion of the same finger or fingers that turn it on,
- A constant pressure switch or a control that will shut off the power when the pressure is released must be in place on all hand-held powered circular saws with blade diameters of 2 inches or more, hydraulic, electric, or pneumatic chain saw, and percussion tools without positive accessory holding,
- Hand-held gasoline powered chain saw must have a constant pressure throttle control to shut off the power to the chain when the pressure is released,
- Operating controls on hand-held power tools will be placed to minimize the possibility of accident operation, if accidental operation would be a potential hazard to employees,
- Portable electric powered tools will be grounded according to the requirements set forth in the Electrical Safety Program. All electric power tools must have a three-prong plug.

Portable Abrasive Wheels

Safety Guards Exceptions

- Mounted wheels used in portable operations 2 inches or less in diameter,
- Wheels used for internal work while within the work being ground,
- Types 16, 17, 18, 18R, and 19 cones, plugs and threaded-hole pot balls where the work offers protection,
- Guards must be made of steel or other material of suitable strength,
- A safety guard must cover the spindle end, nut and flanges. The guard must be mounted in a way that maintains its proper alignment with the wheel. The strength of the fasteners must exceed the strength of the guard,
 - Exception: Safety guards may be constructed so that the spindle end, nut, and outer flange are exposed if the work provides adequate protection to the operator. These may also be exposed when the portable machine is designed for and used with type 6, 11, 27 and 28 abrasive wheels, cutting off wheels, and tuck pointing wheels,
- When the work provides cover for the entire side of the wheel, the guard's side covers can be omitted.

Mounting and Inspection of Abrasive Wheels

- All wheels must be examined before mounting. A ring test must be conducted to ensure they have not been damaged during transit, storage, etc.,
- To conduct the ring test, "tap" the wheels about 45 degrees each side of the vertical midline and about 1-2 inches from the periphery. Then, rotate the wheel 45 degrees and repeat the test. Undamaged wheels will have a clear metallic sound. If the wheel is cracked, there will not be a clear "ring",
- The machine's spindle speed must be checked before mounting wheels to ensure that it doesn't exceed the maximum operating speed as marked on the wheel,
- Grinding wheels must fit freely and remain free on the spindle under all grinding conditions,
- To avoid excessive pressure from spindle expansion and mounting, a controlled clearance must be maintained between the wheel hole and spindle,
- The machine's spindle must be manufactured to nominal (standard) size plus zero minus .002 inch. The wheel hole must be suitably oversized to ensure safety clearance under the conditions of operating heat and pressure,
- All surfaces in contact with wheels, flanges and blotters must be flat and free of aberrant objects,
- When the use of a bushing is required in a wheel hole, it must not exceed the width of the wheel and must not come into contact with the flanges.

Portable Grinders

"Revolving cup guards" that mount behind and turn with the wheel will be used. These will be made of steel or other adequate materials and will enclose the wheel sides up from the back for one third (1/3) of the thickness of the wheel. A clearance of no more than one-sixteenth inch must be maintained between the guard and wheel side.

Right angle grinders, or vertical portable grinders, will have a maximum angle of exposure of 180 degrees. The guard will be placed between the wheel and the operator during use. The guard may be adjusted to ensure that, in case of an accident, pieces of the broken wheel will be deflected away from the worker.

Other Portable Grinders

The maximum allowable angular exposure for the periphery of the grinding wheel and the sides for safety guards must not exceed 180 degrees. The top half of the wheel must be enclosed at all times.

Personal Protective Equipment

Employees will be provided with personal protective equipment (PPE) if they may be exposed to any of these possible hazards:

- Falling, flying, abrasive or splashing objects,
- Harmful dust, vapors, gases, fumes or mists.

HAZARD COMMUNICATION

Purpose

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

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

Scope

This program is applicable to all employees who may come in contact with hazardous chemicals while working for REFLECTIONS GLASS & MIRROR, INC. This document is to be followed by all REFLECTIONS GLASS & MIRROR, INC employees and contractors on REFLECTIONS GLASS & MIRROR, INC owned premises. In addition, this program is to be used in the event an operator program does not exist or is less stringent than our own.

Definitions

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

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

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

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

(GHS) Globally Harmonized System - The Globally Harmonized System (GHS) is an international approach to hazard communication, providing agreed criteria for classification of chemical hazards, and a standardized approach to label elements and safety data sheets. NOTE: Most new GHS requirements apply to substance manufacturers or distributors since they are responsible for including safety data sheets with purchased substances. However, all employers are still required to train each employee on the new label elements and safety data sheets format. Specific training information can be found at: <https://www.osha.gov/dsg/hazcom/>

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

Hazardous Substance - see hazardous chemical.

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

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

IDLH - immediately dangerous to life and health.

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

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

(SDS) Safety Data Sheet - a written or printed document containing chemical hazard and safe handling information, prepared in accordance with the OSHA Occupational Safety & Health Standards, Section 1910.1200, paragraph (g). Recently referred to as (SDS) "Safety Data Sheets" under 2013 GHS HAZCOM update.

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

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

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

(SDS) Safety Data Sheet – a written or printed document containing chemical hazard and safety handling info, prepared in accordance with the new HAZCOM GHS requirements.

Substance - see Chemical.

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

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

Workplace - see Facility.

Workplace Chemical List - see Facility Chemical List.

Responsibilities

A written hazard communication program shall be developed, implemented and maintained at each REFLECTIONS GLASS & MIRROR, INC workplace. The program will describe how labels and other forms of warning, safety data sheets and employee information will be kept, maintained, and disseminated.

The Safety Manager is responsible for developing and implementing the Hazard Communications Program. Managers are responsible for maintaining Safety Data Sheets and the Chemical Inventory List for their respective locations. The Safety Manager reviews the SDS files and Chemical Inventory List at each location at least annually to ensure they are current and complete.

The Safety Manager is also responsible for ensuring that all containers from manufacturers or distributors have the correct and updated labels per the new GHS requirements and for ensuring that all applicable employees are trained on the new label elements and safety data sheets format. Training info can be found here: <https://www.osha.gov/dsg/hazcom/>

Employees are responsible for following the requirements set forth in the Hazard Communication Program, to use proper personal protective equipment, to report containers without labels immediately to their supervisor and to never deface any label.

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

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

Requirements

Introduction

This Hazard Communication Program was prepared for use by REFLECTIONS GLASS & MIRROR, INC to explain how we meet the requirements of the federal Occupational Safety and Health Administration's (OSHA's) Hazard Communication Standard (29 CFR 1910.1200). It spells out how we inventory chemicals stored and used, how we obtain and use safety data sheets, how we maintain labels on chemical substances, and how we train employees about the hazards of chemicals they are likely to come in contact with on the job.

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

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

Non-English Speaking Accommodations

Methods of communication shall include presenting all hazard communication information in the native languages of all affected employees either verbally or in writing to ensure non-English speaking employees understand all REFLECTIONS GLASS & MIRROR, INC hazard communication requirements.

Hazardous Chemicals

REFLECTIONS GLASS & MIRROR, INC maintains a listing of all known hazardous chemicals known to be present at each job site by using the identity it is referenced by on the appropriate safety data sheet (SDS). This identity is often a common name, such as the product or trade name.

The Chemical Inventory List is updated annually by the Hazard Communication Program Coordinator or their designee with additional updates being made when necessary.

The facility Chemical Inventory List must be available for review upon request. Additionally, a written hazard communication program must be developed, implemented & maintained at each workplace.

Safety Data Sheets

Chemical manufacturers are responsible for developing SDS's. REFLECTIONS GLASS & MIRROR, INC shall have an SDS for each chemical used with the exception of consumer products. SDS's must be obtained for each required chemical from the chemical manufacturer, supplier, or vendor. The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheet in a timely fashion is strictly prohibited.

SDS's shall be maintained and readily accessible in each workplace. SDS's can be maintained at the primary work site, however, they should be immediately available in case of emergency. SDS's must be made available upon

request to employees, their designated representatives, the Assistant Secretary of Labor, and to the Director of OSHA.

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

A copy of a SDS request form is located in the first section of the SDS Book. An employee may use a copy of this form to request an SDS or he may ask the Manager for one. In either case, the requested SDS must be given to the employee within 24 hours of being requested.

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

Electronic access (telephone, fax, Internet, etc.) may be used in the acquisition of any needed SDS and to maintain SDS libraries and archives.

The Manager is responsible for seeing that the Chemical Inventory List inventory is maintained, is current, and is complete. He will review and update the inventory and the SDS Book at least annually. When a hazardous material has been permanently removed from the work place, its SDS is to be removed from the SDS's Book and the Chemical Inventory List. The SDS is then placed in a "dead file" in case it is needed in the future.

SDS's for hazardous materials to which employees have been exposed must be maintained after the employee leaves the employment of REFLECTIONS GLASS & MIRROR, INC.

Employees will be advised of all special instructions, PPE, and the hazards associated with chemicals-including chemicals contained in unlabeled pipes-in their work areas. The Manager will inform employees of the hazards of non-routine tasks by presenting a copy of the site specific hazardous materials list, ensuring that the employee is aware of their presence should a non-routine task with unfamiliar materials present itself.

Employees have the right to request SDS on any chemical, which must then be provided without any issues.

Labels, Labeling and Warnings:

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

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

Labels, tags, or markings on containers shall use the following 16-section (GHS) formatting convention and headings:

- Identification
- Hazard(s) identification
- Composition/information on ingredients

- First-Aid measures
- Fire-fighting measures
- Accidental release measures
- Handling & Storage
- Exposure controls/personal protection
- Physical and chemical properties
- Stability and reactivity
- Toxicological information
- Ecological information
- Disposal considerations
- Transport information
- Regulatory information
- Other information, including date of preparation or last revision

All containers must be labeled correctly under the new GHS HAZCOM standard (this responsibility usually falls upon the manufacturers shoulders. However, if labels are not present for any reason, employers are responsible for labeling containers. Upon transferring the content of one container to another, the employee must label the new container with all required information. This information can be obtained from the labeling of the original container or from the material's SDS. Any container of a potentially hazardous material that will not be emptied during one shift must be labeled, without exception.

Personnel in the Shipping and Receiving Departments are responsible for the proper labeling of all containers shipped by REFLECTIONS GLASS & MIRROR, INC and for the inspection of all incoming materials for correct labeling. Chemicals received from vendors that are improperly labeled must be rejected.

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

Training

Employees shall be provided with appropriate, effective information and training on the hazardous chemicals in their work area at the time of their initial assignment, and upon the introduction of a new physical or health hazard into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenics) or specific chemicals. However, chemical-specific information must always be available through labels and safety data sheets.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. Supervisors will conduct supplementary training when deemed necessary in order to reinforce the importance of the proper use and handling of chemicals.

When an outside contractor, such as a pest control worker or a carpenter, enters a REFLECTIONS GLASS & MIRROR, INC site in order to perform a service for REFLECTIONS GLASS & MIRROR, INC, they must first present SDS' for any and all hazardous chemicals which will be used. These SDS' will be treated with the same training requirements as the SDS' kept on site for regularly used chemicals and materials. The Manager will be responsible for contacting each contractor prior to work commencing, in order to gather and disseminate any information concerning chemical hazards the contractor is bringing into the work place.

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

- Requirements, details, and rights of the employee as contained in the Hazard Communication regulation,
- Operations and work areas where hazardous chemicals are present,

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

Multiple Work Sites

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

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


Multiple Employer Job Sites

A pre-job briefing shall be conducted with the contractor before work commences on site.

- During this pre-job briefing, contractors shall provide to REFLECTIONS GLASS & MIRROR, INC current copies of all Safety Data Sheets along with the label information for every hazardous substance brought on-site.
- REFLECTIONS GLASS & MIRROR, INC must notify and provide required SDS and label information for all hazardous materials the contractor may encounter on the job,
- Labeling systems and precautionary measures to be taken by the contractor during both normal conditions and emergencies shall be addressed,
- By providing such information to other employers, REFLECTIONS GLASS & MIRROR, INC does not assume any obligations that other employers have for the safety of their employees,
- In this regard, other employers working on REFLECTIONS GLASS & MIRROR, INC property, or for REFLECTIONS GLASS & MIRROR, INC on client's property, remain fully responsible for developing and implementing their own compliant hazard communication programs.

Hazard Warnings / NFPA 704

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

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

HEAT ILLNESS PREVENTION

Purpose

The purpose of this program is to reduce risks associated with heat illnesses in the work environment.

Scope

The scope of this program extends to all tasks performed in heat-exposed environments.

Definitions

“Acclimatization” refers to the gradual process the body goes through when a person is exposed to heat on a consistent basis. The acclimatization peaks within four to fourteen days for most people with at least two hours of exposure to heat each day.

“Heat Illness” is a serious medical condition caused by the body’s failure to handle a particular amount of heat. Signs of heat illness include cramps, heat exhaustion, fainting and heat stroke.

The “preventative recovery period” is the time it takes the body to recover from heat exposure in order to avoid heat illness.

“Shade” refers to the blocking of sunlight. Shade can be provided by canopies, umbrellas, and temporary structures designed to block out or minimize direct sunlight. Shade is sufficient when objects in the shaded area do not cast a shadow. Shade is inadequate when it does not allow the body to cool. For instance, a car parked in the sun does not provide adequate shade, unless the air conditioning is also used to assist with cooling the body.

Requirements

The responsibility of carrying out and maintaining the Heat Illness Program belongs to managers and supervisors. Physical work factors that may contribute to heat related illnesses shall be taken into consideration prior to performing a task. Additionally, supervisors must take personal factors into consideration prior to assigning a task where heat related illnesses are probable.

Access to Water

All employees will have access to safe and potable drinking water. If an employee cannot bring adequate sources of water with them, notify REFLECTIONS GLASS ownership and special accommodations will be made to ensure employee has safe drinking water.

Access to Shade

All employees will have access to shade. Employees believed to be suffering from heat illness, or believed to be in need of a recovery period, will be provided a shaded area. The shaded area will be open to the air, ventilated or cooled. Access to shade will be permitted at all times. For more information, refer to definition of “Shade”.

Control Measures

Each work location that is involved in working in heat exposed environments will set forth procedures to control the effects of environmental factors that may contribute to heat illness. The most common of these factors are temperature, air circulation, humidity, and exposure to radiant heat sources; while controls shall include proper PPE, engineering controls and administrative controls as outlined in this program.

Physical factors that may induce heat related illness must be considered before a task is performed. Common physical factors include level and duration of physical activity, type of work and clothing factors such as color, breath-ability and weight.

Supervisors must consider personal factors that may contribute to heat illness before assigning tasks where heat related illness may occur. These factors include weight, level of fitness, age, prior heat related illnesses and use of drugs or alcohol.

The following measures shall be in place to control the effects of environmental factors that can contribute to heat related illnesses. Each work site will develop procedures specific to the site, but will include these minimums:

- Employees are encouraged to report low water levels or dirty water to the supervisor or designee,
- Supervisors will frequently encourage employees to drink water,
- Short meetings will be held every morning to remind workers to drink water frequently throughout the duration of the shift during hot weather,
- Water containers will be placed as close as possible to workers,
- Water will be replenished when levels of drinking water fall below 25%

The following high-heat procedures shall be followed whenever the temperature exceeds 95 degrees Fahrenheit:

- (1) Ensuring that effective communication by voice, observation, or electronic means is maintained so that employees at the work site can contact a supervisor when necessary. An electronic device, such as a cell phone or text messaging device, may be used for this purpose only if reception in the area is reliable.
- (2) Observing employees for alertness and signs or symptoms of heat illness. The employer shall ensure effective employee observation/monitoring by implementing one or more of the following:
 - (A) Supervisor or designee observation of 20 or fewer employees, or
 - (B) Mandatory buddy system, or
 - (C) Regular communication with sole employee such as by radio or cellular phone, or
 - (D) Other effective means of observation.
- (3) Designating one or more employees on each worksite as authorized to call for emergency medical services, and allowing other employees to call for emergency services when no designated employee is available.
- (4) Reminding employees throughout the work shift to drink plenty of water.
- (5) Pre-shift meetings before the commencement of work to review the high heat procedures, encourage employees to drink plenty of water, and remind employees of their right to take a cool-down rest when necessary.

When possible, working hours may be adjusted to work during cooler times of the day.

If modified hours or a shorter work shift are not possible, workers will be provided with more water and more frequent rest breaks.

Supervisors will monitor all workers and be aware of the onset of heat related symptoms.

Cell phones or other immediate means of communication will be provided to supervisors to ensure that emergency services can be reached, if necessary. Supervisors shall ensure the functionality of these devices at the designated worksite prior to the beginning of the shift.

Workers will be reminded every morning of the worksite address and directions to the site to inform first responders in case of emergency.

All new hires will be assigned a buddy to ensure that training and REFLECTIONS GLASS & MIRROR, INC procedures are understood and followed.

Training

Training on the following topics will be provided to all employees:

- Environmental, physical and personal factors that contribute to heat illness,
- The importance of water consumption, frequently and in small quantities, throughout the duration of the shift when the work environment is hot and workers are sweating more than usual while working,
- The significance of the process of acclimatization,
- Types of heat illness and the associated signs and symptoms,
- The importance of reporting to the supervisor or employer when signs or symptoms of heat illness are present in themselves or in another worker,
- Procedures set forth for responding to symptoms of heat illness, including the processes for providing emergency medical services, should those measures be necessary,
- Procedures for contacting emergency services and/or for transporting workers to a place that can be reached by emergency responders,
- Procedures to ensure that simple and accurate directions to the site can be provided to emergency responders.

It is mandatory that supervisors receive training in the prevention and detection of heat related illnesses prior to supervising workers. Supervisors must also be trained in all heat illness emergency response procedures.

Training will be provided on REFLECTIONS GLASS & MIRROR, INC heat illness procedures to prevent heat illness and the procedures to follow when heat illness is suspected.

Communication regarding these policies will be provided in an easily understandable format to all affected employees.

REFLECTIONS GLASS & MIRROR, INC will make certain that all outdoor workers, including temporary workers, have been trained in the prevention and detection of heat illness.

INCIDENT INVESTIGATION AND REPORTING

Purpose

The purpose of this program is to put in place effective procedures for reporting, evaluating, and investigating reported incidents and non-conformance in order to prevent further occurrences.

Responsibilities

Responsibilities for incident investigation will be assigned to individuals prior to occurrence of an incident. Individual responsibilities for reporting and investigation must also be already in place and assigned prior to incidents.

REFLECTIONS GLASS & MIRROR, INC Safety Manager

Ensures investigations are conducted in a timely manner, assists in the identification of corrective actions, and makes sure the corrective actions are carried out expeditiously.

Site Manager and Supervisors

- Investigates (or assists in) incident investigations,
- Ensures all incidents are corrected in order to comply with REFLECTIONS GLASS & MIRROR, INC policy,
- Will assist REFLECTIONS GLASS & MIRROR, INC injured employees to a medical provider for initial treatment.

Employees

- Immediately report any injury, job related illness, spill, or damage to any property to their immediate supervisor.
- If their immediate supervisor is unavailable, the employee will then immediately notify the project manager or next person higher up the chain of command. Employees who are eligible to be first responders will be trained and qualified in first aid techniques in order to help mitigate the degree of loss during the immediate post-incident phase.

Procedure

After rescue or response, actions to prevent further loss should immediately occur if the scene is safe. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment/response requirements such as safe rendering of hazardous materials or explosives employed.

Investigations of Incidents & Non-conformance

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformance from occurring in the future.

The following incident must be reported IMMEDIATELY to the employee's supervisor. If that person is not available then REFLECTIONS GLASS & MIRROR, INC Safety Manager shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment, or assets,

- Work related injuries or illnesses,
- Any damage to property, including vehicle incidents,
- Hazardous chemical spillage, which includes loss of containment and contamination,
- Non-conformance to safety or environmental rules, policies, or standards.

The supervisor will notify all necessary individuals and agencies and then begin the incident investigation process.

In the case of a major injury or incident, the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation will take place as soon as possible, while the facts are still fresh within the minds of everyone involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or their memory fades. An incident investigation must be thorough and only focused with the cause and prevention. Administrative disciplinary action will be kept separate from the investigation process.

Equipment

All necessary equipment will be made available to aid in conducting a proper investigation. Equipment may include some or all of the following items:

- writing equipment such as pens/paper,
- measurement equipment such as tape measures and rulers,
- cameras, small tools, and audio recorder,
- PPE, flags, equipment manuals, etc.

The Safety Manager shall have a incident investigation kit prepared in advance to facilitate a thorough investigation.

Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

EXTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Owner Client	24 hrs	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes
As Required Injury Reporting	OSHA / Owner Client	Within 8 hrs	Yes
Fire / Explosion	911 / Site Fire Response / Owner Client	ASAP	Yes
Reportable Spill	Site Environmental / Owner Client	Within 24 hrs	Yes

Property/Vehicle Damage	Owner Client	Within 24 hrs	Yes
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INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Safety Manager	ASAP	Yes
Injury Above Minor First Aid	Safety Manager	ASAP	Yes
As Required Injury Reporting	President then Safety Manager	ASAP	Yes
Fire / Explosion	Safety Manager	ASAP	Yes
Reportable Spill	Safety Manager	ASAP	Yes
Property/Vehicle Damage	Safety Manager	ASAP	ASAP

Time Elements for OSHA and Client Notification

Required incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the owner client as soon as possible or no longer than within 24 hours of the occurrence.

Incident Review Team and Incident Investigation Report

All incidents will be investigated according to levels of incident severity. While all incidents will be investigated, the extent of such investigation shall reflect the seriousness of the incident according to a root cause analysis process or other similar method approved and put in place by REFLECTIONS GLASS & MIRROR, INC Safety Manager. An Incident Review Team that participates in the determination of the final root cause will be formed to aid investigative incident reporting. The team will consist of representatives of management, or other personnel assigned by REFLECTIONS GLASS & MIRROR, INC Safety Manager.

Initial Identification/Assessment of Evidence

Initial identification of evidence immediately following the incident should include:

- the location of the incident, a listing of people on the scene,
- equipment, and materials involved,
- and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

Collection/Preservation and Security of Evidence

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured and collected through the use of notes, photographs, witness statements, flagging, and the seizing of documents and equipment. All evidence shall be dated appropriately.

Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.

The final incident investigation report will consist of findings with critical factors, evidence, corrective actions, responsible parties, and a schedule for corrective action and timeline for completion.

Results of incident investigations are communicated to employees via the Incident Notice form.

Preparation of the Written Incident Report

Written incident reports will be prepared and will include the Field Incident Report Form along with a detailed narrative statement concerning the events. The format of the narrative report should include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included in the report.

The supervisor completes a REFLECTIONS GLASS & MIRROR, INC Field Incident Report and takes the steps outlined below when beginning an incident investigation:

- Provide emergency assistance, as needed and if qualified to do so,
- Secure the area as quickly as possible to retain area in the same condition as the time of the incident,
- Notify management by phone according to the Incident Notification Matrix,
- Identify potential witnesses,
- Use investigation tools, as needed (camera, drawings, video, etc.),
- Secure by Lock out/Tag out any equipment involved, as evidence,
- Interview witnesses (including the affected employee) and obtain written, signed statements which will be faxed to the REFLECTIONS GLASS & MIRROR, INC Safety Manager,
- Prepare a REFLECTIONS GLASS & MIRROR, INC Field Incident Report, sign the form, and then fax it to the REFLECTIONS GLASS & MIRROR, INC Safety Manager
- Implement any corrective actions needed immediately.

Incident Notice Form

REFLECTIONS GLASS & MIRROR, INC shall provide documentation and communication of lessons learned and reviews of similar operations to prevent re-occurrence. Lessons learned are reviewed and communicated to the appropriate personnel. Changes to processes and procedures must then be put into immediate effect to prevent re-occurrence of similar events.

In order to communicate incident information and the lessons learned from them, REFLECTIONS GLASS & MIRROR, INC Safety Manager shall send the Incident Notice to all work sites. The form shall be posted on all employee bulletin boards and shall be discussed in weekly safety meetings until all employees at the job site have been informed of both the incident and the corrective actions put in place.

Corrective Actions Resulting from Incident Investigations

Incident investigations should result in corrective actions. Individuals should be assigned responsibilities relative to the corrective actions, and should be monitored until all corrective actions have been implemented. The incident investigation and report can be closed after verifying the necessary corrective actions are now in place.

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by REFLECTIONS GLASS & MIRROR, INC Safety Manager to ensure timely follow up and completion.

Corrective actions will also use as needed for revisions to site specific safety plans and REFLECTIONS GLASS & MIRROR, INC wide Safety and Health Management System.

Injury Classifications

Injuries shall be classified per the following:

- First Aid – Dressing on a minor cut, removal of a splinter, or other such typical treatments for household type injuries,
- Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury,
- Number of Lost or Restricted Work Days – The number of days, excluding the day of injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked,
- Occupational Injury – An injury which results from a work related activity,
- Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work. The illness would result in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss, or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Minor treatments (first aid) for illnesses do not fall within this classification,
- Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) but does not result in lost work time beyond the day of injury,
- Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the actual day of injury. For example, an injured employee is kept at work but not performing the essential functions of their regular job,
- Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable must be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface on the job but are the result of a non-work-related event or exposure that occurs outside the work environment,
- The injury or illness results from voluntary participation in a wellness program or a flu shot, exercise class, racquetball, baseball, or other such activities,
- The injury or illness is the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in).

- The injury or illness is the direct result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours,
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

Training

REFLECTIONS GLASS & MIRROR, INC shall train all personnel in their roles, responsibilities, and in proper incident investigation techniques.

Training frequency will be based on the specific area of responsibility but will never be more than two years apart.

Training requirements relative to incident investigation and reporting shall include the following:

- Awareness,
- First Responder Responsibilities,
- Initial Investigation at the Accident Scene,
- Managing the Accident Investigation,
- Collecting and analyzing data,
- Developing Conclusions,
- Judgments needs, and
- Reporting the Results

INJURY AND ILLNESS RECORDKEEPING

Purpose

The purpose of this program is to establish standards for recording REFLECTIONS GLASS & MIRROR, INC injuries and illnesses and to comply with applicable regulatory requirements.

Scope

This program applies to all employees on all REFLECTIONS GLASS & MIRROR, INC or client facilities.

Responsibilities

Safety Manager

- Implement this program and make supervisors aware of its requirements.
- Responsible for maintaining all records pertaining to this program.

Supervisors

- Ensure that all work related injuries and illnesses are promptly reported to the safety manager.
- Shall become familiar with the requirements of this program.

Employees

- Ensure that all work related injuries and illnesses are reported to your supervisor immediately.

Procedure

Written records of all work-related fatalities, injuries and illnesses must be kept to ensure accurate recordkeeping procedures. Therefore, REFLECTIONS GLASS & MIRROR, INC shall:

- Use the following instructions and forms to record injuries and illnesses:
<http://www.osha.gov/recordkeeping/RKforms.html>
- Record all illnesses or injuries on the OSHA 300 log within 7 calendar days of receiving information that the injury or illness occurred.
- Post the OSHA 300A summary form in a place that is accessible and visible to employees from February 1st through April 30th.
- Maintain OSHA 300 records for at least 5 years.

* The OSHA 300A form shall be reviewed and signed by a REFLECTIONS GLASS & MIRROR, INC official.

Posting Requirements

REFLECTIONS GLASS & MIRROR, INC shall post the OSHA 300A summary form in a conspicuous place that is easily accessible and available to employees such as a lunchroom, time clock area or other effective common area.

Post the OSHA 300A summary form from February 1st through April 30th as per the OSHA recordkeeping requirements.

If the posted OSHA 300 summary form is defaced, altered or otherwise unreadable, it shall be replaced so that employees can effectively read the form information.

All OSHA recordkeeping forms shall be kept for at least 5 years as per the OSHA recordkeeping requirements.

LADDER SAFETY

Purpose

This program is designed to establish rules and requirements for the construction, maintenance and utilization of common ladder types.

All ladders installed on REFLECTIONS GLASS & MIRROR, INC equipment, whether purchased or engineered, are subject to this program's requirements.

Scope

Procedures outlined in this program apply to all employees who use ladders. This document covers REFLECTIONS GLASS & MIRROR, INC employees and contractors and shall be used on all REFLECTIONS GLASS & MIRROR, INC owned and operated premises. When work is performed off-site, the agent's program has precedence unless it is less stringent than REFLECTIONS GLASS & MIRROR, INC program.

Definitions

Ladder – a device consisting of side rails joined at regular intervals by rungs, steps or cleats, on which a worker may step in an ascending or descending motion.

Step ladder - a portable ladder that is self-supporting and nonadjustable length-wise. Steps are flat; the back is hinged. The size of a step ladder is designated by the length of the ladder when measured along the front edge of the side rails.

Single ladder – a portable, nonadjustable ladder with only one section. This ladder requires support. The length of the side rail denotes its size.

Extension ladder – a portable ladder consisting of two or more sections that can be adjusted length-wise by moving the sections along brackets. Its size is denoted by the sum of the lengths of all sections measured along the side rails.

Fixed ladder – a ladder that is permanently attached to equipment or a structure.

Individual-rung ladder - a fixed ladder with no side rails. Each rung is individually attached to a building, structure, or equipment.

Cage – an enclosure surrounding a fixed ladder designed to encircle the climbing space of the ladder to keep the climber safe.

Key Responsibilities

Managers and Supervisors

- It is the responsibility of all managers and supervisors to ensure that all employees and contractors are trained to use and inspect ladders according to the manufacturer's guidelines,
- It is the responsibility of all managers and supervisors to ensure that all employees and contractors are aware that any inspected ladder found to have a defect may not be used and must be taken out of service.

Employees

- Employees are responsible for inspecting ladders before, during and after each use to make certain the condition of the ladder is safe for its occupants,
- Employees are responsible for following the procedures outlined in this program,
- Employees are responsible for reporting damage or needed repairs to the supervisor.

Procedure

Inspection, Care and Safe Work Practices of Ladders

Inspection

Ladders must be inspected for visible defects by a qualified person periodically and after any incidents that may affect the safe use of the ladder.

- Ladders must have uniformly spaced rungs or meet OSHA/ANSI specifications for rungs. These rungs, steps or cleats must be parallel and level while the ladder is positioned for use,
- Any portable or fixed ladder that is found to have structural defects must immediately be marked in such a way that identifies the ladder as defective, or tagged with a "Do Not Use" sign and removed from service until repaired. These structural defects include, but are not limited to: broken rails, corrosion, broken or missing rungs or other faulty parts,
- Ladders that are tipped over must be inspected by a qualified person for dents and bends in the side rails or unusually dented rungs. Hardware connections, rivets and connections between rungs and side rails shall also be inspected at this time,
- Use of ladders with broken side rails, broken or missing steps, or other defective equipment is strictly prohibited. Employees are not permitted to make improvised repairs to these ladders,
- Wooden ladder parts must be free from splinters and sharp edges, free from shake and free from other irregularities.

Care

Ladders must be well-maintained at all times.

- The joints between steps and side rails must be tight with all hardware and fittings attached securely,
- Movable parts must operate freely without play or binding in the movement,
- Metal bearings in locks, pulleys, wheels, etc. must be lubricated frequently,
- Rope must be replaced when it is frayed or badly worn,
- Auxiliary equipment and safety feet must be kept in good condition,
- Rungs must be clean of grease and oil,
- Ladders must be stored in areas that are well-ventilated to avoid sagging and warping.

Ladder Safe Work Practices

Ladders must only be used for their intended purposes.

Ladders are required to be secured at the top or held in place by a person standing at the base.

Ladder footing must be placed on a level, stable surface.

Extension ladders are to be placed in a 4:1 ratio. Non-self-supporting ladders are to be used at an angle to ensure that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the distance between the foot and top support).

If a ladder cannot be extended, the ladder must be secured at the top to a strong support that will not allow the ladder to bend or veer.

Ladders must never be placed on unstable bases, such as boxes or barrels, in order to get additional height.

Ladders may not be placed in a horizontal position to be used as runways, scaffolds or platforms.

Only one person shall occupy a ladder at any given time.

Ladders must not be placed in a doorway wherein the door opens toward the ladder unless the door is locked, guarded, or blocked open.

Ladders used in high traffic areas must be barricaded to avoid accidents and collisions.

Ladder occupants are not permitted to stand on the top two rungs of a ladder or on the top of a step ladder.

The minimum overlap during the use of two-section extension ladders is as follows:

Size of Ladder (feet)	Overlap (feet)
Up to and including 36'	3
Over 36' up to and including 48'	4
Over 48' up to and including 60'	5

Ladders must extend at least three (3) feet above the top of the upper landing surface. Side rails must extend a minimum of three (3) feet above the upper landing surface. When ladders cannot be extended, the top of the ladder must be secured to a rigid support to prevent movement.

Employees must keep a three (3) point grip on the ladder at all times. Tools and equipment must be carried up on a hoist or belt. Employees are prohibited from carrying anything in the hands that could result in a fall or injury.

Employees must face the ladder when going up or down the ladder.

Employees shall not climb on the back legs of stepladders; these are designed for increased stability, not climbing.

No person may move a ladder while it is occupied.

Portable Ladders

Length of stepladders shall not exceed 20 feet. Single ladder length shall not exceed 30 feet.

Two-section extension ladders shall not exceed 60 feet in length. All two-section ladders are designed with sections that fit together and are arranged to enable the upper section to be raised and lowered.

Ladders must be kept a minimum of 10 feet away from power lines.

Ladders must have the appropriate load capacity for the task at hand. Ladders may not be loaded beyond the maximum recommended load for that ladder, nor in excess of the capacity as rated by the manufacturer. Weight consists of the combined weight of the climber and his equipment:

- I (250 lbs capacity)
- I-A (300 lbs capacity)
- II (225 lbs capacity)
- III (200 lbs capacity)

Fixed Metal Ladders

Ladders must be made to withstand a minimum of 200 pounds.

Metal rungs must have a diameter of at least $\frac{3}{4}$ inches; wooden rungs must have a diameter of at least 1 $\frac{1}{8}$ inches.

The distance between rungs shall not be more than 12 inches (1 ft.) apart and must be uniform along the length of the ladder.

Rungs must be at least 16 inches long and provide protection to prevent a foot from slipping off the end.

A rung must have at least seven (7) inches between itself and the structure behind it.

Employees must use fall restraint systems when on fixed ladders exceeding six (6) feet in length,

- A cage is required if the ladder is 20 feet tall or greater,
- Cages on fixed ladders must be positioned at least seven (7) feet but no more than eight (8) feet from the walking surface below the cage,
- Cage widths must clear 15 inches on either side of the centerline of the rung,
- Cages must not extend less than 27 inches or greater than 28 inches from the rung's centerline,
- Fall restraint systems may be used in place of ladder cages.

NON-DOT DRUG & ALCOHOL POLICY

PURPOSE

It is the objective of REFLECTIONS GLASS & MIRROR, INC to:

- Promote, provide and maintain a safe working environment for its employees and employees of its affiliates or subsidiaries.
- Protect REFLECTIONS GLASS & MIRROR, INC property.
- Cooperate with customers in their efforts to establish a safe, drug and alcohol free work environment.
- Comply with contractual obligations and existing Federal regulations.

REFLECTIONS GLASS & MIRROR, INC PREMISES

For the purpose of this Policy, the term “premises” refers to REFLECTIONS GLASS & MIRROR, INC premises, its affiliates or subsidiaries and includes all property, facilities, land, platforms, buildings, structures, fixtures, installations, automobiles, truck and other vehicles and equipment – whether owned or leased. This policy also includes any other work location, parking lots or mode of transportation to and from locations while in the course and scope of REFLECTIONS GLASS & MIRROR, INC employment and/or business.

POLICY STATEMENT

Being under the influence of drugs and/or alcohol, or possessing any firearms while working or while on REFLECTIONS GLASS & MIRROR, INC premises is strictly prohibited. The unauthorized use, possession, sale, transfer, storage or manufacture of illegal substances or drug paraphernalia; the abuse of legal drugs; or the unauthorized use, possession or sale of alcoholic beverages by an employee of REFLECTIONS GLASS & MIRROR, INC is strictly prohibited. No

REFLECTIONS GLASS & MIRROR, INC employee will report to work, enter REFLECTIONS GLASS & MIRROR, INC premises, or conduct REFLECTIONS GLASS & MIRROR, INC business under the influence of illegal/controlled substances or alcohol. “Under the influence” means:

A sufficient amount of a substance is in the employee’s system to produce a positive test result

The employee is exhibiting erratic abnormal behavior posing a risk to the employee and/or others.

Compliance to this policy, including consent to searches and medical testing, is a condition of employment. Employees have the right to refuse to cooperate with REFLECTIONS GLASS & MIRROR, INC medical testing and search requirements. However, refusal to permit such searches and/or medical testing will be grounds for termination.

Illegal drugs, unauthorized controlled substances, look-a-likes, designer and synthetic drugs (including the presence of any detectable amount in the employee while working), and any other drugs or abnormal substances which may affect an employee's senses, motor functions or alter a person's perception while working are strictly prohibited.

Alcoholic Beverages - under no circumstances will alcoholic beverages be brought onto REFLECTIONS GLASS & MIRROR, INC property or consumed while on REFLECTIONS GLASS & MIRROR, INC premises.

Drug paraphernalia and other unauthorized items may not be brought onto REFLECTIONS GLASS & MIRROR, INC premises under any circumstances.

Firearms, Weapons, and Ammunition may not be brought onto REFLECTIONS GLASS & MIRROR, INC premises under any circumstances.

Prescription Drugs may not be brought onto REFLECTIONS GLASS & MIRROR, INC premises - except under the following conditions:

- Employees shall have a valid medical prescription for any prescription drugs. If this medication can/does impair the employee's performance, the employee will immediately notify his/her supervisor or alternate member of management.
- The medication shall be in the employee's name in the original vial and have the doctor's name and prescription number on the label.
- Each prescription shall not be older than one year of the date issue.
- Employees shall only possess enough medication for the normal work shift.
- NOTE: REFLECTIONS GLASS & MIRROR, INC SHALL RESERVE THE RIGHT TO HAVE AN OUTSIDE PHYSICIAN DETERMINE IF A PRESCRIPTION DRUG OR MEDICATION INHIBITS EMPLOYEE PERFORMANCE. REFLECTIONS GLASS & MIRROR, INC SHALL RESTRICT THE USE OF ANY SUCH DRUG OR MEDICATION WHILE ON REFLECTIONS GLASS & MIRROR, INC PREMISES OR CONDUCTING REFLECTIONS GLASS & MIRROR, INC BUSINESS. THIS SHALL ALSO INCLUDE RESTRICTING THE EMPLOYEE'S WORK ACTIVITY OR PRESENCE AT THE CUSTOMER'S WORK SITE.

EMPLOYEE ASSISTANCE PROGRAM

The Employee Assistance Program will include displaying/providing a list of community service hot-line numbers, and distributing informational material on drug use, chemical dependency and REFLECTIONS GLASS & MIRROR, INC Alcohol, Firearms and Controlled Substance policy.

- All Management and supervisory personnel who will determine whether an employee should be tested for prohibited drug use based upon reasonable cause will receive a minimum of sixty (60) minutes of training. This training will provide instruction on the specific and contemporaneous physical, behavioral and performance indicators of probable prohibited drug use.
- All employees will participate in an informational session structured to give the participants; (1) an understanding of the effects/consequences of substance abuse/dependency on personal safety, health and work environment and (2) an understanding of the substance abuse regulations (DOT, USCG).
- All Employee Assistance Program training will be documented and kept on file.

ACKNOWLEDGMENT

Employees shall acknowledge that compliance with this policy is a condition of employment.

DRUG TESTING PROCEDURE

Personnel may be tested for drugs and/or alcohol by any accepted method to include but not limited to urinalysis and/or blood testing:

- Randomly, whenever random testing is in effect.
- Upon reasonable cause as determined by a competent person.
- When any injury, accident or incident occurs that may create reasonable suspicion that drugs and/or alcohol may have been involved.
- Refusal to take a test for the presence of drugs and/or alcohol will result in disciplinary action that may lead to termination.

UNACCEPTABLE RESULTS

Employees with unacceptable test results shall be prohibited from working on client / host sites or facilities.

PPE PROGRAM

Purpose

The purpose of the Personal Protective Equipment program is to establish procedures for using and maintaining personal protective equipment that must be used by employees in order to prevent injuries.

Scope

This program applies to all REFLECTIONS GLASS & MIRROR, INC employees. It is to be used at all times on REFLECTIONS GLASS & MIRROR, INC worksite. If a REFLECTIONS GLASS & MIRROR, INC employee performs work on a site other than REFLECTIONS GLASS & MIRROR, INC's site, the facility owner's plan should be used if it exists and is as strict (or more strict) than this plan. In cases where the other facility's plan does not exist or is less strict than this plan, REFLECTIONS GLASS & MIRROR, INC employees will operate under this plan.

Key Responsibilities

SAFETY Manager

- Helps to select appropriate PPE. Some work tasks expose employees to hazards that cannot be eliminated by means of engineering or administrative controls. In these cases, the SAFETY Manager assists the supervisor and project manager in identifying and selecting suitable PPE based on the task being performed, the work conditions, and the frequency and duration of the exposure. REFLECTIONS GLASS & MIRROR, INC employees provide feedback to the supervisor regarding the fit, comfort, and suitability of the PPE to be used. The reasons for the PPE selected are provided to the employees.
- Assists the supervisor and site manager to ensure the PPE obtained meets the requirements of this program and applicable regulations
- Conducts Worksite Hazard Assessments - This assessment must determine whether hazards exist or are likely to exist, that require the use of PPE. Hazards may include those related to: high/low temperatures, impact/motion, sharp objects, falling objects, rolling or pinching objects, chemicals, materials, radiation, electrical hazards, and general workplace layout. The SAFETY Manager documents the tasks that were evaluated, hazards that were discovered and the PPE required to protect employees. They also ensure that affected employees are aware of hazards and the required PPE prior to being assigned to the hazardous task. The documents are certified and include the certifier's name, signature, and dates, and identifies the assessment documents.

Managers and Supervisors

- Managers and supervisors regularly monitor employees to ensure PPE is being properly used and cared for. They also ensure employees receive follow-up training if required so they have the adequate knowledge, skill, and ability to use PPE.
- Managers and supervisors will use REFLECTIONS GLASS & MIRROR, INC progressive discipline to enforce PPE safety rules and ensure that the Required PPE Poster is properly posted.

Employees

- Properly use and care for PPE.
- Report any changes in exposure that may necessitate a re-assessment of the task for PPE.
- Report and replace defective or damaged PPE. Never use defective or damaged PPE.
- You must wear the required PPE. Failure to do so could result in termination of employment.

Procedure

General

REFLECTIONS GLASS & MIRROR, INC will provide protective equipment, including personal protective equipment (for head, eyes, face, and extremities), respiratory devices, protective clothing, and protective shields and barriers. This protective equipment must be used wherever injury or impairment of function of any body part (through absorption, inhalation or physical contact) is likely that because of process or environmental hazards, radiological hazards, chemical hazards, or mechanical irritants. All PPE shall be provided, used and maintained in a sanitary and reliable condition.

Employees are NOT allowed to use employee-owned equipment, except prescription safety glasses and safety footwear. REFLECTIONS GLASS & MIRROR, INC must ensure that employee-owned safety glasses and footwear are adequate, and REFLECTIONS GLASS & MIRROR, INC will maintain and clean them.

Defective or damaged equipment shall not be used and must be tagged or destroyed and replaced.

All issued personal protective equipment will be cost-free to the employee. All employees must understand and follow the procedures identified in this program.

Eye Protection

When exposed to facial or eye hazards from flying fragments, chemicals, acids or caustic liquids, melted metal, or chemical gases or vapours, employees must use the required eye or face protection. PPE used to protect the eyes and face must be in compliance with ANSI Standard Z87.1-2003 (Z87+), *Occupational and Educational Personal Eye and Face Protective Devices*.

Safety Glasses

While on REFLECTIONS GLASS & MIRROR, INC property, employees, subcontractors, and visitors must at all times wear safety glasses with side shields that meet ANSI Z-87.1-2003 standards with "high Impact lenses". Requirements as described below:

- In shops and warehouses, and at field locations, except in striped safety zones that have been designated and approved.
- In all yard work zones. Everyone in the vicinity of loading or unloading equipment. All employees who perform mechanic or maintenance work, operate equipment (e.g., forklift and welding), test stand operations, or do any work that may potentially cause an eye injury.
- In a restroom, office, or any other building when performing work that may potentially cause an eye injury.
- REFLECTIONS GLASS & MIRROR, INC will provide with visitor glasses. If approved prescription safety glasses are not available for an individual, they must wear "Over the glass" type safety goggles or glasses over their regular prescription glasses until they obtain approved prescription safety glasses.
- When assisting welders, employees must wear absorbent safety glasses to protect the assistant from ultra-violet (UV) and/or infrared rays (IR).
- No employee is allowed to wear dark shaded lens (sunglasses) darker than # 1 shade unless welding or assisting a welder.
- The requirement to wear safety eyewear will be exempt only based on a written "exceptions for medical reasons" from a doctor.
- Employees are not required to wear safety glasses:
 - Inside an office.
 - In parking lots when traveling to and from vehicles, or office buildings using main doors that do not enter shops.

Goggles

- When handling or mixing liquid chemicals, solvents, paints, etc., employees must wear chemical splash proof goggles as recommended on the Material Safety Data Sheet for the material being handled.
- When blowing equipment down with air the employee must wear dust proof goggles. They must also be worn when the employee is performing a job task where safety glasses do not do an adequate job of preventing airborne particles from entering the openings around the lenses and side shields.

Face Shields

- When operating a hand held or immobile grinder with a wire or abrasive wheel the employee must wear a full face shield over safety glasses. The full face shield must also be used when chipping paint or concrete. Also, when performing job tasks where flying objects may potentially strike the face, if safety glasses or goggles do not provide adequate protection, the employee must wear a full face shield over safety glasses.

Head Protection

When working in areas where a head injury is possible due to employee initiated impact, or impact from falling or other moving objects, employees must wear protective helmets. Helmets must be in compliance with ANSI Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection, or must be equally effective.

- Hardhats must be worn when working in areas where head injury is possible from falling objects.
- Hardhats must be worn at all warehouse, field, and shop locations, or any location where it is determined to be necessary as per the location's PPE Hazard Assessment.
- Never alter hardhats in any way.
- Never paint or apply unauthorized stickers, name plates, etc. on hardhats.
- Never drill, cut, bend, or apply heat to a hardhat.
- Never alter the suspension system of a hardhat.
- Employees must inspect hardhat regularly for chips, scratches, cracks, signs of heat exposure (sun cracks), etc.
- Immediate replace any defective hardhats.
- Never place a hardhat in the rear window of a vehicle (they will be exposed to the sun or may become a projectile in a vehicle accident).
- Hardhats must be made available to visitors.
- REFLECTIONS GLASS & MIRROR, INC must provide hardhats.
- REFLECTIONS GLASS & MIRROR, INC will train employees in the use, care and maintenance of head protection equipment.

Hearing Protection

While in posted "High Noise" areas, all employees, subcontractors, and visitors must wear hearing protection. See REFLECTIONS GLASS & MIRROR, INC Hearing Conservation Program for additional information.

All areas that are known, or suspected to have, noise levels in excess of 85 dBA (constantly or intermittently) must have warning signs posted.

When noise caused by machinery, tools, etc., prevents normal conversations to be clearly heard, employees shall wear hearing protection even if warning signs are not posted.

General rule of thumb: If you must yell to be heard, you require hearing protection.

Types

- Preformed Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted

- REFLECTIONS GLASS & MIRROR, INC will supply ear muffs and ear plugs employees in sizes and configurations that are comfortable for the employee.

Care and Maintenance

- Employees must inspect hearing protection before each use.
- Keep hearing protection clean to prevent ear infections.
- Discard disposable ear plugs when they become dirty, greasy, or cracked.
- Replace any ear muffs that have cracked seals, deteriorated foam inserts, or are defective.

Fit

- Because everyone is different, hearing protection must be selected for the individual. The employee must try a variety of styles to find one that is comfortable and provides adequate protection.
- REFLECTIONS GLASS & MIRROR, INC will instruct employees in how to obtain the proper fit.

Hand Protection

Gloves

- When performing work tasks that may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals, employees must wear gloves.
- Welding: When performing arc welding or oxy/gas cutting, employees must wear welding gloves made of leather or other heat resistant materials.
- Chemical: When handling chemicals that specify gloves as PPE, the employee must impervious (chemical resistant) gloves.
- To select the correct glove type, refer to the specific chemical's Material Safety Data Sheet.
- Employees who work with chemicals, i.e., solvent vats, will be issued their own gloves for hygienic purposes.
- Leather: When working with sharp materials, or when handling rigging equipment, employees must wear leather gloves.
- Cloth: When handling objects or materials that could cause blisters, splinters, cuts, etc., the employee must wear cloth gloves.
- Heat Resistant: When handling hot bearings, races, or other materials or objects (heated beyond room temperature), employees must wear heat resistant gloves.
- Insulated: To prevent frostbite in extreme cold climates, employees must wear insulated gloves.
- Glove Inspections
 - Prior to each use, inspect gloves for holes, tears, and worn areas.
 - Periodically air test chemical gloves for pinholes by tightly twisting the cuff, expand the glove by applying low air pressure, and submersing the glove in water to check for bubbles.
 - Immediately discard any defective gloves.
- Exception: While working with rotating machinery, machinists are exempt from wearing gloves.

Foot Protection

All employees with regular duties at field locations, in shops and warehouses must wear safety footwear.

- Visitors and office workers entering these areas infrequently are not required to wear foot protection as long as they stay away from the work being performed.
- If visitors or office workers must be in the close proximity to the work, the work must be stopped while in the area or safety footwear must be worn.
- When in shops, warehouses, field locations and parts departments, employees must wear leather or equivalent boots (lace up or pull up).
- Boots must provide ankle protection, and have must have soles that are designed to protect the feet from punctures, and must have defined heels for climbing ladders.
- When job tasks there is a risk of equipment or material crushing the foot, toe guards must be worn.
- Safety footwear must comply with ANSI Z41-1999 standards.

- Some client locations may require everyone to wear safety footwear. Before visiting field locations, check with the local supervisor for client requirements.

Fall Protection

When performing certain elevated jobs (over six feet), employees must use personal fall protection. Refer to REFLECTIONS GLASS & MIRROR, INC Fall Protection Program.

Worksite Hazard Assessment

Hazard assessments must be performed, signed and documented. If it is determined that a hazard exists or is likely to exist, a PPE must be used. Following are some hazard sources that may be identified:

- High or low temperatures
- Chemical exposure (see MSDS for guidance)
- Flying fragments, melted metal or other face, eye, or skin hazards
- Falling objects, or the possibility of dropping an object
- Employee falling from a height in excess of 6'
- Sharp objects
- Rolling or pinching that could crush hands or feet
- Electrical hazards

Anytime that these hazards may cause injury to employees, PPE must be selected to eliminate or substantially reduce the potential for injury. Employees will be notified for the selection and reason.

Each affected employee will be apprised of the results of this assessment, and a copy of the assessment will be kept at the local office.

Each affected employee must be fitted with the selected/identified PPE. The Training section of this program addresses fitting (including proper donning, and doffing), cleaning and maintenance of PPE. All PPE use exemptions must be supported by the PPE hazard assessment.

Monitoring

Site managers and supervisors must monitor worksite tasks to identify changes in hazards, or the introduction of new hazards. If the site manager or supervisor discovers a new hazard, they must advise the SAFETY Manager. The SAFETY Manager conducts a hazard assessment for appropriate PPE for the new hazard.

The SAFETY Manager monitors how effective the PPE Procedure is, and recommends improvements to management.

Training

REFLECTIONS GLASS & MIRROR, INC will train all employees who may need to wear PPE. Each affected employee must be fitted for PPE as required. Training will include:

- When it is required to use PPE.
- What type of PPE is required.
- How to put PPE on, take it off, adjust it and wear it.
- PPE limitations.
- How long PPE is useful, and how to dispose of it.
- How to clean and maintain PPE in to ensure it is sanitary and in reliable condition.
- How to report and replace defective or damaged PPE. Never use defective or damaged PPE.

Retraining

Retraining is necessary when:

- There are changes to workplace the workplace that makes the previous training obsolete.

- There are changes in the type of PPE.
- The employee shows improper use, a lack of use, or insufficient skill or understanding in selecting PPE, the necessity of PPE, the use of PPE and its limitations.

Documentation

Records of training will be kept at the local office. The training record will include:

- The name of the employee(s) trained;
- The training dates; and
- The subject of the training.

RISK ASSESSMENT

Purpose

- To establish procedures for the identification, assessment and management of hazards in the workplace;
- To proactively determine the possible risks of new materials and processes before they are incorporated into the work environment;
- To determine which job duties require risk assessment.

Key Responsibilities

Responsibilities are as set forth in this program.

REFLECTIONS GLASS & MIRROR, INC is to evaluate a work site to determine all possible and existing hazards prior to the associated work of said site or prior to the commencement of work at the site.

Hazard and Risk Determination

The processes for hazard identification and assessment of risk are used for all routine and non-routine activities. New processes and changes in current processes, services, or products will also be evaluated using the hazard identification process.

Safety Managers are responsible for administering a baseline hazard assessment of each worksite. This evaluation will identify the tasks to be performed and the potential hazards associated with those tasks. The results should be compiled into a report detailing the hazard assessment and recommendations for managing or eliminating the identified hazards. This report must be signed and dated by the Safety Manager.

The following data should be included in the baseline hazard identification. This list is not all-inclusive:

- Extent of the work,
- Safety, legal and other requirements to be met,
- Prior occurrences and failures in compliance,
- Environmental conditions that may cause harm, including hazardous energy sources and other contaminants,
- Detailed walk through and assessment of the work site.

Identification of hazards shall include, but are not limited to:

- General Preventative Measures
- Work Isolation
- Driving
- Enclosed Spaces
- Heat Exposure
- Energy Isolation
- Bloodborne Pathogens
- Noise Exposure
- Musculoskeletal Disorders
- Other policies and procedures set forth by REFLECTIONS GLASS & MIRROR, INC
- Other identified measures specific to a particular site or work scope

REFLECTIONS GLASS & MIRROR, INC is responsible for implementing formal procedures for the identification of potential hazards through the use of Job Safety Analysis (JSA), Job Hazard Analysis (JHA), and evaluations specific to particular sites and facilities.

For each hazard identified or risk assessed, controls to manage or eliminate those specific hazards and risks are assigned to the work-site.

Employees and contractors are encouraged to participate in the identification of hazards. REFLECTIONS GLASS & MIRROR, INC's program ensures that employees and sub-contractors are actively involved in hazard identification process and the concerns of said employees and contractors are thoroughly addressed.

Employees shall be trained in the identification of hazards, to include usage and care of Personal Protection Equipment (PPE).

Identified hazards are to be reported to the supervisor and addressed by the supervisor immediately. Supervisors shall review the worksite hazard assessment with all employees during orientation at the employee's assigned worksite. The safety manager shall implement methods such as weekly JHA and risk assessment reviews to ensure identified hazards are addressed and mitigated. Documentary evidence of such review shall also be maintained in order to further ensure mitigation of such hazards.

Worksite Hazard Assessment Review

Worksite hazard assessments are to be reviewed annually and repeated as necessary to ensure the worksite maintains safe and healthy working conditions. Specifically, evaluations must be updated when new tasks are assigned that have not been evaluated for risk, when operating processes or procedures change, prior to construction of new work sites or when significant changes are made to an existing worksite.

Supervisors and project managers are responsible for informing the Safety Manager when new hazards are introduced into the work environment. This will require revision of the site's planning and assessment needs.

Risk Assessment

Hazards are classified and ranked based on severity. The program requires that hazards are identified, classified and prioritized based on their associated risk. (For further information regarding severity and probability of risks and hazards, see the risk analysis matrix.)

Risk Management: Ensuring Identified Hazards are Addressed and Moderated

The following describes how identified hazards are addressed and moderated:

- Assessed hazards and their associated risks are addressed and moderated through assignment, documentation of completion, and implementation of controls, which include administrative and engineering controls and the required PPE as set forth in the assessment of specific worksite hazards. Work will not commence prior to the assessment of the worksite. Tasks with a High (Intolerable) risk assessment shall not be performed.
- Upon identification of existing or potential hazards to workers during a hazard assessment, REFLECTIONS GLASS & MIRROR, INC shall implement measures to eliminate the hazard whenever possible. If the hazard cannot be eliminated, it will be controlled to the greatest practicable extent. When possible and practicable, engineering controls must be used to eliminate or control hazards. If engineering controls cannot adequately address a hazard, administrative controls will be implemented to control the hazard to the greatest extent possible. If the hazard is uncontrollable by both engineering and/or administrative controls, REFLECTIONS GLASS & MIRROR, INC will provide appropriate PPE to be used by workers exposed to the hazard. If an increased level of worker safety may be attained by combining engineering and administrative controls and PPE, REFLECTIONS GLASS & MIRROR, INC may use this combination.

Control of Hazards in an Emergency

Only employees trained in the emergency control of hazards may expose themselves to the hazard. The hazard will be controlled by the minimum number of employees required to resolve the emergency situation. For example, in

the event of a gas leak, only those trained in fire safety, gas shut off and other related measures may attempt to contain the hazard.

REFLECTIONS GLASS & MIRROR, INC shall contain the hazard to the greatest extent possible while the situation is being remedied.

Hazard Assessment Certification

A worksite hazard assessment shall be completed and signed by the Safety Manager, and will include the site specific Health, Safety and Environment (HSE) plan. Worksite hazard assessments are reviewed annually and shall be updated as new tasks arise that have not been assessed for risk.

Job Safety Analysis (JSA)

Job Safety Analyses shall be performed for the following: jobs with a high rate of risk or illness, new jobs, complex jobs that require written instructions and/or jobs that have been subjected to major changes in policies or procedures. Completed JSAs may be obtained from the Safety Manager.

Site Specific HSE Plan (SSSP)

Each worksite shall have a site specific HSE plan. All employees reporting to a site will receive orientation from their supervisor. This orientation shall include the Site Specific Safety Program (SSSP) for that particular location. SSSPs contain policies on health and safety, site specific safety requirements, a personal protective equipment matrix and a worksite hazard assessment specific to that site and signed by the Safety Manager.

Review Process

Reviews of the hazard assessment program will be conducted to guard against new hazards deriving from corrective measures. This review will involve the safety committee and will include a consideration for management of change.