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Introduction to Our Program

An Injury and Illness Prevention Program (IIPP) protects you and your co-workers from work-related injuries and illnesses. Please take the time to read it carefully. Direct any questions you may have about our IIPP to the Operations Manager or the Training and Compliance Manager.

An effective IIPP includes these elements:

1. A written plan designating who's in charge of safety program implementation.
2. A periodic inspection system to identify workplace hazards.
3. Procedures for investigating the cause of accidents, illnesses or injuries.
4. Methods to ensure elimination of hazards once they're identified through inspections and accident investigations.
5. A safety and health training program specific to each job that's required for new employees as well as whenever new substances, processes, procedures or equipment are introduced to the workplace.
6. A system for employees to communicate safety concerns to employers without fear of reprisal.
7. A system for ensuring employee compliance with safety and health practices.
8. Maintenance of appropriate records and steps taken to implement and maintain the accident prevention program.

Administrative Duties

The Operations Manager has overall responsibility for coordinating safety and health programs for Trinity Medical Management ("Trinity"). He/she has the responsibility, authority, and overall accountability for the OSHA Injury & Illness Prevention Program. The Operations Manager will review and update the program, as necessary. Copies of the written program may be obtained in the Operations office.


Individual Cooperation Necessary

Safety in the workplace is a team effort. Everyone must do their part to ensure not only their own safety, but, the safety of everyone else as well. Trinity has established policies and procedures for working safely and provides to our employees mechanical and physical protection, however, "your" safety is ultimately "your" responsibility.


Safety Program Goals

Trinity's goal is to reduce work-related injuries and illnesses to the lowest possible level. Ultimately, our goal is to eliminate all work-related injuries and illnesses. *"NO JOB IS SO IMPORTANT AND NO SERVICE SO URGENT THAT WE CANNOT TAKE TIME TO PERFORM OUR WORK SAFELY"*


Basic Safety Rules

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1. Compliance with applicable Federal, State, County, City, Client and Company Safety Rules and Regulations is a condition of employment.
2. Every injury, regardless of its nature or extent, should be reported to your supervisor. Failure to comply with this rule could delay the correction of the situation which caused the injury.
3. The possession or use of alcoholic beverages on company property is prohibited. No worker will report for duty, or perform duties, while under the influence of intoxicants.
4. The use of narcotics or tranquilizers by employees during working hours is prohibited unless under the supervision of a physician and knowledge of your supervisor.
5. Do not remove, displace, damage, destroy or carry off any safety device, safeguard, notice, or warning.
6. Do not engage in fighting, horseplay, or distraction of fellow employees.
7. Do not attempt to lift anything that may be too heavy or bulky for your physical capacity. If in doubt, get help.
8. Good housekeeping will be maintained in all work areas. Clean up waste materials promptly and completely after a job is completed.
9. Observe all traffic rules and regulations when driving.
10. Do not operate a piece of equipment unless you have been instructed in its use.
11. Smoking is allowed "only" in designated areas.
12. Never use a box, bucket, chair, shelf, etc., as a ladder. Use only approved step-stools or ladders.
13. Observe and obey all safety signs and procedures in any area you are assigned to work in.
14. Report all damaged or faulty equipment to your supervisor unless you are authorized to make repairs.
15. No unauthorized person will make electrical or mechanical repairs or adjustments on equipment.
16. Refrain from hanging articles from building fire sprinkler system or insulated steam or water lines.
17. Do not block or obstruct an aisle, passageway, hallway, stairway, escape way, or exit. Do not use these areas for storage.
18. Maintain adequate access to electrical panels.
19. Do not block or cover fire extinguishers, fire alarms, or sprinkler heads.
20. Approach doors slowly and open them with caution; someone may be on the other side.
21. Fire doors must not be blocked open or locked in such a way that they cannot be opened in the exit direction.
22. When using stairs, do not carry loads so large that the view of stair treads is obscured. Keep one hand free for the hand rail.
23. Keep stairs clear of all objects. Pick up anything you find on the stairs and store or dispose of it properly.
24. Know where the fire extinguisher in your area is, how to use it, and for what types of fires it is rated.
25. Burning of decorative candles is not permitted without specific permission from the fire marshal.

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26. Electric coffee pots or other heating devices should be set on tile, metal, or other non-flammable surfaces, and must be of industrial quality for use in company buildings.
27. Gasoline or similar flammable solvents should not be used to clean floors, walls, or other surfaces, or for cleaning skin.
28. Do not run over cords, computer cables, or telephone wires across walkways creating a tripping hazard.
29. Do not use extension cords as a substitute for permanent electrical wiring. The only exception to this are "fused" multi-outlet strips which are "UL listed." If extension cords are necessary for short-term use, use only heavy-duty cords.
30. Report unsafe conditions or behavior to your supervisor or to the Operations Manager.
31. Wipe up all spilled liquids immediately, to prevent falls on polished floors. Place some type of warning marker near wet spots until dry. Hazardous material spills must be reported to the Operations Manager. Assistance in cleanup will be provided if requested.
32. Do not remove labels from chemical containers unless the containers are empty and have been thoroughly cleaned. Clean, empty containers may be used for other materials if proper new labels are affixed.
33. Clean machine parts using only approved solvents and parts-washing baths specifically designed for such use. Use with adequate ventilation. Dispose of waste solvents through the safety office.
34. Employees are not permitted to stand in the back of moving vehicles or to sit on the sides of moving pickups. Seat belts are to be used wherever provided.
35. Fall Protection Requirements: *(SEE FALL PROTECTION PROGRAM)*
 - a. Full Body Harness and Lanyards will be worn and secured any time there is a fall hazard of more than 6 feet.
 - b. Lifelines will be erected to provide fall protection where work is required in areas where permanent protection is not in place. Horizontal lifelines will be a minimum of 1/2" diameter wire rope. Vertical lifelines will be 3/4" manila rope or equivalent and will be used in conjunction with an approved rope grab.
 - c. Structural steel erectors are required to "Hook Up" with full body harness and lanyard.
 - d. Workers using their lanyards to access the work or position themselves on a wall or column, etc., must use an ADDITIONAL Safety lanyard for fall protection.
 - e. Proper use of man lifts: As soon as you enter an articulating boom lift and before the lift is started, you must put on the harness and attach the lanyard to the lift. On scissor lifts employees are not required to wear harnesses.
36. All personnel will be required to attend a Safety Meeting as required by Project Requirements.
37. Burning and cutting equipment will be checked daily before being used. Flash back arresters will be installed at the regulators on both Oxygen and L.P. bottles. All gas will be shut off and hoses disconnected from bottles and manifolds at the end of the day. Caps will be replaced on bottles when gauges are removed. When gauges are removed and caps replaced, the Oxygen and L.P. bottles will be separated into storage areas not less than 20' apart with a "No Fire or Smoking" sign posted and a fire extinguisher readily available. Makeshift field repairs will not be allowed.

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38. Drinking water containers are for drinking water and ice only. Tampering with or placing items such as drinks, etc., in the water cooler will result immediate termination. The "common drinking cup" is not allowed. Only disposable cups will be used.
39. All tools whether company or personal, must be in good working condition. Defective tools will not be used. Examples: chisels with mushroomed heads, hammers with loose or split handles, guards missing on saws or grinders, etc.
40. All extension cords, drop cords and electrical tools shall be checked (to include presence of GFI's) and color coded by a designated competent person each month. This will be part of the assured grounding program. Electrical cords and equipment must be properly grounded with GFI's in place and checked by a competent person. Cords and equipment which do not meet requirements will be immediately tagged and removed from service until repairs have been made.
41. Jobsite speed limit is 10 MPH. No one is permitted to ride in the bed of a truck standing up. Sitting on outside edges is also prohibited: "YOU MUST BE SITTING DOWN INSIDE THE TRUCK OR TRUCK BED WHEN THE VEHICLE IS IN MOTION." Riding as a passenger on equipment is prohibited unless the equipment has the safe capacity of transporting personnel.
42. Adequate precautions must be taken to protect employees and equipment from Hot Work such as welding or burning. Fire extinguishing equipment will be no further away than 50 ft. from all Hot Work. Return used extinguishers to Operations to be re-charged immediately. Use of welding blinds is required in high traffic areas.
43. All scaffolding and work platforms must be in accordance with OSHA specifications. All ladders must be in safe condition without broken rungs or split side rails. Damaged ladders will be removed from service. Ladders will be secured at the top and bottom and extend 3' past the working surface. Metal ladders around electrical work are prohibited. Never use a step ladder as a extension ladder. A step ladder must only be used when fully opened with braces locked.
44. Crowfoot connections on air hoses will be wired to prevent accidental disconnection. Compressed air will not be used to dust off hands, face, or clothing.
45. All floor openings or excavations will be barricaded on all sides to ensure employees are aware of the hazard. Floor holes will be covered, the covers SECURED, and clearly marked.
46. Warning signs, barricades, and tags will be used to fullest extent and will be obeyed.
47. Respiratory Protection is required for employees exposed to dust hazards or to other contaminants that may be encountered. **(SEE RESPIRATORY PROTECTION PROGRAM)**
48. Excavation: **(SEE EXCAVATION PROCEDURE)** As a minimum:
 - a. All spoils, materials and equipment will be a minimum of 2' from the edge or excavation.
 - b. No employees are permitted to work under loads being handled by lifting or digging equipment.
 - c. A stairway, ladder or ramp will be located in trenches 4' or deeper, no more than 25' away from the work area.
 - d. Barricade around work area. A barricade must be erected around the excavation.
49. Confined Space: **(SEE CONFINED SPACE PROGRAM)**

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- a. Any vessel, manhole or pit 5' deep or greater-including trenches, or any structure not meant for human occupancy is considered a confined space.
- b. A completed Confined Space Permit by competent person is required prior to entry into permit required confined spaces.
- c. Contact your Supervisor prior to starting any Confined Space work for copies of permit required and a list of required Safety Equipment.
- d. See Appendix "A" for detailed requirements of equipment and procedures in use at the job site.

50. Lockout/Tagout Procedures: **(SEE LOCKOUT/TAGOUT PROCEDURE)**

- a. A written Lock Out/Tag Out Program is required to be in use at the jobsite when Lockout/Tagout procedures are used. This is available from the Operations Manager.
- b. Every employee involved in the work around energized equipment has the right to put on their own tag and lock. Otherwise, a gang-type lock box can be used if agreed upon by all parties involved.
- c. A responsible person from each craft will be designated to lock and tag. They will be the only persons able to remove tags and locks after work is complete.

51. Scaffold Tag System:


- a. Green tags are to be placed on 100% complete scaffolds with all braces, locks and hand, mid & toe rails in place before use.
- b. Yellow tags are for incomplete scaffolds. If scaffold is missing a hand, mid or toe board, it must have a yellow tag and employees on it must be tied off at all times.
- c. Red tags are for scaffolds that are in the process of either being erected or disassembled. These scaffolds are not to be used at any time.
- d. Scaffold tags should be placed in a highly visible location on the scaffolds for all employees to see.

Designated Responsible Party

Trinity has designated the Operations Manager to function as our Responsible Safety Officer. The designation of an RSO is the most critical part of preparing ourselves to succeed or fail with the establishment and maintenance of our company safety program. The designated RSO is the glue that holds the many aspects of your program together.

The key critical ingredients considered in making this decision were:

- Willingness - the person chosen must indicate a genuine interest and desire to do this work.
- Knowledge - College degrees in Safety and/or experience in the field are necessary for a full time Safety program.
- Money - A budget needs to be established for this program to, at a minimum, include the following:
 - Reference material - software, books, etc.....
 - Designated person attending seminars.....
 - Safety committee meetings.....
 - Incentive Program.....

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The total cost/savings benefit ratio is arrived at by estimating our fines, should OSHA inspect our business before we become prepared, and the plus or minus effect on your experience modifier.

Accountability - The person to fulfill these tasks must be accountable only to the company CEO or President in all matters of safety and health for these reasons:

- This plainly demonstrates top management's commitment to the safety program.
- Keeps top management in the loop and provides for guidance at all stages of the program.
- Prevents creativity of the designated safety person from being thwarted or stifled by intermediate supervisors who are unaware of the tremendous negative impact OSHA fines and increased workers' compensation premiums can have on the company's bottom line.

Responsibilities

- Will be responsible for the administration and implementation of the Safety and Health Regulations as they apply to Trinity. In addition, he/she will administer the company safety program and see that it is put into effect and administered as outlined below.
 - Will see that a monthly report is completed, listing all accidents which occurred during the preceding month. These will be reviewed to determine type and degree of accident so that corrective measures may be taken through safety talks to personnel, bulletins to employees, purchase of new equipment, or change in work procedures.
 - Will see that all sub and trade contractors abide by their safety and health program and that documentation is made of any alleged violations.
 - Will maintain and update a set of basic safe work rules. These safety rules will be explained by the Operations Manager to the President and Supervisor(s) who, in turn, will discuss these with employees. Company safety rules will be posted in all work areas.
 - Will periodically conduct safety inspections and file reports.
 - Will provide safety training for employees.
 - Will read, review and provide the President and Supervisor(s) with updated OSHA Safety Standards.
 - Will make necessary corrections in company policy and work procedures by advising of changes in OSHA rules and regulations.
 - Through the purchasing section, will see that all vendors are advised of the company safety and health programs as they apply to the vendor and supplier personnel entering the job site. In addition, all purchase orders will require compliance with OSHA Act.
 - Will meet regularly with supervisors/management to review safety procedures on the job, and, in general, check on the supervision's compliance with the company safety and health program.
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Responsibilities

President's Responsibilities


- Read and review the OSHA Safety Standards and become knowledgeable of federal, state and local standards.
- Responsible to see that a study is made of the work area(s) to determine the exposure to accidents, which may develop. Particular attention will be given to the protection of the public and to fire prevention facilities.
- Be safety oriented when walking through work areas. Report to the Operations Manager all unsafe acts and conditions either of your company's or sub or trade contractor's personnel.
- Review all accident reports.

Supervisor's Responsibilities

- The Supervisor is responsible for the implementation of the company safety and health program.
- Make available all necessary personal protective equipment, job safety materials, and First Aid equipment.
- Instruct the employees that safe practices are to be followed and safe conditions maintained throughout the job.
- Inform the Lead person that they are not to require nor permit their workers to take chances -rather that they instruct the workers in proper and safe procedures.
- Require all contractors and their prime subcontractors to adhere to all safety regulations. The Supervisor will report any unsafe conditions on contractor portions of the work to the Operations Manager.
- Review all accidents with employee and see that corrective action is taken immediately.
- Be familiar with the laws pertaining to safety and their basic requirements.
- Investigate all accidents. File a complete accident report with the Operations Manager and correct the causes immediately. Use OSHA Form 301 or its equivalent.
- Be familiar with the laws pertaining to safety and their basic requirements.

Employee Responsibilities

- Work according to good safety practices as posted, instructed and discussed.
- Refrain from any unsafe act that might endanger himself/herself or his/her fellow workers.
- Use all safety devices provided for his/her protection.
- Immediately report any unsafe situation or acts to his/her supervisor or safety personnel.
- In the event of an injury, report to the designated area for First Aid treatment. In all cases, the employee and Supervisor will report and/or record all accidents.
- Maintain a clean and safe work area.
- Be a safe worker, off the job, as well as on.

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Safety Committee Responsibilities

In general, the committee will serve in an advisory capacity to Management on determining a general plan of action for the company's safety policy as set by management. More specifically, the members of the committee will familiarize themselves with safety standards and assist in formulating plans for the application of the standards in all work areas.

Employee Compliance & Accident Free Workplace

The Company ensures that every employee complies with safe and healthy work practices by incentives, training, re-training programs and disciplinary programs. Trinity promotes employee compliance with the company IIPP by rewarding employees who avoid work-related injuries and illnesses by working safely, and by submitting suggestions to management that will reduce our injury and illness rates. However, under no circumstances should any employee "not" report a legitimate work-related injury or illness. Timely and accurate reporting of injuries and illnesses is absolutely critical to an effective safety program.

To help us all meet our goal of an accident free workplace, we have instituted a contest: we will offer a prize for each month in which there is not a single time-loss accident at work. The prize will be awarded at random. Each month, the prize will be announced in advance. All employees who worked more than 1 hour in the month are eligible. Failure to report an industrial injury will suspend the prize for two months


Employees who fail to comply with the safety requirements described in our IIPP will be subject to the company's disciplinary action policy.

Disciplinary Policy

The disciplinary system does not exist primarily to punish employees. Its purpose should be to control the work environment so that workers are protected and accidents are prevented. A disciplinary system helps ensure workplace safety and health by letting the Trinity's employees know what is expected of them. It provides workers with opportunities to correct their behavior before an accident happens.

A disciplinary system is one of the keys to successfully implementing the Company's safety and health program. It ensures that the Company's rules and safe working practices are taken seriously by employees and are actually followed. It lets employees know how Trinity expects them to operate in relation to the goals of the Company's safety and health program. And it lays out the actions the Company will take if individuals do not meet the Company's expectations. The employee's supervisor and all members of management are responsible for the enforcement of this disciplinary program.

A disciplinary system cannot work in a vacuum. Before the Company can hold employees accountable for their actions, the Company first needs to establish its safety and health policy and disciplinary rules.

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Policy Statement

Employees need to know the Company's position on safety and health and what the Company expects of them. They need a clear understanding of the rules and the consequences of breaking those rules. This is true in all areas of work, but it is especially important for worker safety and health. As part of the policy statement, and in the employee safety handbook, the Company has a written statement setting forth the Company's disciplinary policy. Company managers and supervisors will always be on the lookout for safety violations and will conscientiously and vigorously enforce the Company's commitment to safety.

Employee Information and Training


It is important that employees understand the system and have a reference to turn to if they have any questions. Therefore, in addition to issuing a written statement of the Company's disciplinary policy, the Company has drawn up a list of what it considers major violations of Company policy and less serious violations. This list specifies the disciplinary actions that will be taken for first, second, or repeated offenses. This list is not all-inclusive other types of violations can result in specific levels of disciplinary action relative to the seriousness of the violation and entirely at the Company's discretion.

The list for immediate termination and grounds for immediate discharge are:

- Drinking alcohol, and/or drug abuse prior to or during working hours
- Fighting, provoking or engaging in an act of violence against another person on Company property
- Theft
- Willful damage to property
- Failure to wear Personal Protective Equipment (eye protection, hearing protection, safety helmets, etc.).
- Not using safety harnesses and lanyards when there is a potential for falling
- Removing and/or making inoperative safety guards on tools and equipment
- Tampering with machine safeguards or removing machine tags or locks
- Removing barriers and/or guardrails and not replacing them
- Failure to follow recognized industry practices
- Failure to follow rules regarding the use of company equipment or materials
- Major traffic violations while using a company vehicle
- Engaging in dangerous horseplay
- Failure to notify the Company of a hazardous situation and
- Other major violations of company rules or policies

General Offences requiring a warning and can lead to termination:

- Minor traffic violations while using Company vehicles
- Creating unsafe or unsanitary conditions or poor housekeeping habits
- Threatening an act of violence against another person while on company property

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- Misrepresentation of facts
- Unauthorized use of Company property
- Excessive tardiness and late to work
- Disrespect and/or insubordination to authority
- Other violations of Company Policy and rules

Training

Training can reduce the need for disciplinary action. The Company will instruct employees in the importance of workplace safety and health, the need to develop safety habits, the Company's operations, safe work practices, and the hazards they control, and the standards of behavior that the Company expects. The Company's employees must understand the disciplinary system and the consequences of any deliberate, unacceptable behavior.

Supervision

Supervision includes both training and corrective action. Ongoing monitoring of the Company's employees' work and safety habits gives the Company's supervisors the opportunity to correct any problems before serious situations develop. In most cases, effective supervision means correcting a problem before issuing any punishment.

Where the relationship between employees and their supervisors is open and interactive, problems are discussed and solutions are mutually agreed upon. This type of relationship fosters a work environment where the need for disciplinary action is reduced. When such action is needed, the parties are more likely to perceive it as corrective than punitive.


Employee Involvement

Employees are encouraged to help informally in the enforcement of rules and practices. The intent here is not to turn employees into spies and informers, but to encourage them to be their "brother's keeper" and to watch out for the safety and health of their colleagues. Many employers successfully have encouraged an atmosphere -- a company "culture" -- where employees readily speak up when they see an easily corrected problem, for example, a coworker who needs reminding to put on safety goggles.

The Company's employees deserve the opportunity to correct their own behavior problems. An effective disciplinary system is a two-way process. Once a problem is spotted, discuss it with the employee, who should be given at least one or two opportunities to change the behavior or correct the problem. Only after discussion (and possibly some retraining), should disciplinary action be taken.

Appropriate Control Measures

Disciplinary actions need to be proportionate to the seriousness of the offense and the frequency of its occurrence. It is certainly inappropriate to fire someone for occasional tardiness.

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It is equally inappropriate to issue only oral warnings to an employee who repeatedly removes a machine guard.

Disciplinary procedures should not be instituted without explanation. The Company will provide feedback to the employee on what behavior is unacceptable, why the corrective action is necessary, and how the employee can prevent future violations and disciplinary action. In addition, take time to recognize an employee who improves or corrects his/her behavior.

Consistent Enforcement

Workers must realize that safe work practices are a requirement of employment and that unsafe practices will not be tolerated. It is necessary, therefore, that the employer has a disciplinary system that is implemented fairly and consistently.

If the Company's disciplinary system is to work well and be accepted by the Company's workforce, the system applies equally to everyone. This includes subjecting managers and supervisors to similar rules and similar or even more stringent disciplinary procedures.

For minor violations, supervisors will meet with the employee to discuss the infraction and inform the employee of the rule or procedure that was violated AND describe the corrective action needed to remedy the situation.

Documentation


One key to ensuring fairness and consistency in a disciplinary system is keeping good records. It is in the best interest of both the Company and the employee to have written rules and disciplinary procedures. It is just as important to document instances of good or poor safety and health behavior, including discussions with the employee, and to place relevant information in the employee's personnel file..

Documentation serves a variety of purposes. It helps the Company to track the development of a problem, corrective actions, and the impact of measures taken. It provides information so the Company can keep employees informed of problems that need correction.

When the Company is evaluating the managerial and supervisory skills of a supervisor, it provides a useful record of how they handled problems.

If warnings, retraining, and other corrective actions fail to achieve the desired effect, and if the Company decides to discharge an employee, then documentation becomes even more critical. Conversely, the Company will conduct an annual clearing of the personnel files of employees whose good overall safety records are marred by minor warnings.

Safety & Health Training

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Trinity is committed to instructing all employees in safe and healthy work practices. All employees are trained in general safety and healthy work practices and for their specific job assignments. The training should be provided prior to or at the time of initial job assignment.

The Company will provide training to each employee with regard to general, acceptable, safety procedures and to any hazards or safety procedures that are specific to that employee's work situation.

Training can take many forms and is synonymous with education and can be attained in a number of ways.

Company Safety Rules: Employees should read the rules and understand them. The issuance of these rules should be logged and signed receipts should be kept on file. Each new employee, as he arrives on the job, should be approached in the same manner.

Periodic Safety Talks – the company should attempt to hold a safety talk with their employees on a weekly or at least monthly basis. The talk may consist merely of restating the company safety rules or warning of dangerous conditions which exist. A particular subject may be covered, such as lockout tagout, confined space, or fire prevention.

Changed Conditions -When any of the job operation changes or when new hazardous materials are brought into the workplace, employees should be made aware of new or added potential dangerous situations that might occur and the proper action employees can take to maintain a safe workplace.


Safety Equipment -Employees should not simply be issued protective equipment. They should be instructed as to its proper and safe use.

Consistency/Redundancy -The employer must consistently and routinely entertain the concept of safety training. Once is not enough. At the orientation meeting of new employees, on through the follow-up weekly/monthly safety talks, the central theme must be to dwell on employees not committing unsafe acts.

Management Follow-Up -Management must not be content with advising employees on unsafe practices. A follow-up of employee actions must be made. The Supervisor(s) must be instructed to watch for employees committing unsafe acts. Employees should be reprimanded when found doing unsafe acts. (See disciplinary policy)

Documentation -All actions taken by Management as it relates to Safety Training/Education should be documented. Records are kept to document safety and health training for each employee by name or other identifier, training date, types of training and training providers.

Individual/Group Instruction -Safety Education can be aimed at a group such as at a weekly/monthly safety talk or at an individual as in a case where the employee is being given

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instruction on use of a new tool, etc., by the Supervisor. Whichever the case may be, it should be documented.

Safety training must be ongoing. It must be given to all employees and members of management. Documentation of instruction and other forms of safety awareness techniques must be made. Never assume everyone knows the safest way of performing his or her task.


The Company provides training:

- When the program is first established;
- To all new employees;
- To all employees given new job assignments for which training has not previously been received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard; and
- For supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.

Safety Training Topics

We train our workers on the following checked training subjects. Other training may be conducted depending on hazards present in the workplace.

- The Company's Code of Safe Practices.
- Confined spaces.
- Safe practices for operating any equipment.
- Good housekeeping, fire prevention, safe practices for operating any construction equipment.
- Safe procedures for cleaning, repairing, servicing and adjusting equipment and machinery.
- Safe access to working areas.
- Protection from falls.
- Electrical hazards, including working around high voltage lines.
- Crane operations.
- Trenching and excavation work.
- Proper use of powered tools.
- Guarding of belts and pulleys, gears and sprockets, and conveyor nip points.
- Machine, machine parts, and prime movers guarding.
- Lock-out/tag-out procedures.
- Materials handling.
- Chainsaw and other power tool operation.
- Tree falling/bucking procedures and precautions, including procedures for recognizing and working with hazard trees, snags, lodged trees, and unsafe weather conditions.

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- Yard operations, including skidding, running lines, unstable logs, rigging and communication.
- Landing and loading areas, including release of rigging, landing layout, moving vehicles and equipment, and log truck locating, loading and wrapping.
- Fall protection from elevated locations.
- Use of elevated platforms, including condors and scissor lifts.
- Safe use of explosives.
- Driver safety.
- Slips, falls, and back injuries.
- Ergonomic hazards, including proper lifting techniques and working on ladders or in a stooped posture for prolonged periods at one time.
- Personal protective equipment.
- Respiratory Equipment.
- Hazardous chemical exposures.
- Hazard communication.
- Physical hazards, such as heat/cold stress, noise, and ionizing and non-ionizing radiation.
- Laboratory safety.
- Bloodborne pathogens and other biological hazards.
- Other job-specific hazards


Periodic Safety Training Meetings

The purpose of the meeting is to convey safety information and answer employee questions. The format of most meetings will be to review, in language understandable to every employee, the content of the injury prevention program, special work site hazards, serious concealed dangers, and material safety data sheets. Each week, the Operations Manager will review a portion of the company's safe work practices contained in this booklet, or other safety related information. Whenever a new practice or procedure is introduced into the workplace, it will be thoroughly reviewed for safety. A sign-up sheet will be passed around each meeting, and notes of the meeting will be distributed afterwards. A copy of the notes will also be placed in the file of each employee who attends the meeting. Employee attendance is mandatory and is compensable unless part of an official state approved training program or pre-employment requirement. Trinity provides tailgate safety meeting on a weekly basis.

Employee Training Documentation

Trinity maintains documentation of safety and health training for each employee, including employee name or other identifier, training dates, type(s) of training, and training providers. This documentation will be maintained for one (1) year.

Training records of employees who have worked for less than one (1) year for the Company will

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not be retained beyond the term of employment if they are provided to the employee upon termination of employment. Employee training records are maintained in the Operations office.

Employee Communication

Trinity ensures that there is an adequate system in place to communicate to affected employees on safety and health matters. Example: safety meetings, written communications, postings, etc.


Occupational safety and health matters will be promptly communicated with employees using the following methods:

- **SAFETY COMMITTEE:** Safety Committees will communicate with employees on inspections and abatement activities, accident investigation findings, and general committee activities. Minutes of Safety Meetings are available for employee review.
- **BULLETIN BOARDS:** A safety bulletin board will be located in each work area. The cal-OSHA Poster and the company's Safety Policy will be permanently posted on all bulletin boards. In addition, the minutes of the last Safety and Health Committee meeting will be posted on all bulletin boards. Other safety related items will be posted on the bulletin boards as they become available.
- **TAILGATE TALKS:** Supervisors will give Tailgate talks at least once each week to all employees. Provisions must be made to ensure that employees who were not present are given the information presented during the talk. This may be done by presenting the talk at a later time for the missing employees or by posting an outline of the talk on the safety bulletin board. Tailgate talks must be documented on the SAFETY MEETING REPORT.
- **EMPLOYEE SAFETY HANDBOOK:** An Employee Safety Handbook will be issued to each employee. This handbook covers basic safety rules, guidelines for safe work performance, company policy, etc. (Note: supervisors will be provided a SUPERVISOR'S SAFETY HANDBOOK, which will include the Employee's Safety handbook and appropriate additional information for supervisors).
- **SAFETY POSTERS:** Safety Posters either purchased from a vendor or produced by the Safety and Environmental Coordinator will be posted on the bulletin board and at other appropriate locations.
- **SAFETY PERFORMANCE ANALYSIS:** At least once each quarter, the Safety and Environmental Coordinator will prepare an analysis of the effectiveness of the safety program. This analysis will include accident statistics for the company. The analysis will be posted on safety bulletin boards

Accident Prevention Policy Posting

A copy of this manual will be posted in the work area.

Safety Committees

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Accident prevention and control of hazards is the result of a well-designed and executed safety and health program. One of the keys to a successful program includes company safety committees composed of management and general labor personnel. Two of the most critical functions of a well-designed, trained safety committee are safety audits and accident investigations. The basic purpose of audits and investigations is to determine measures that can be taken to prevent accidents in the future. Trinity is committed to accident prevention in the workplace.

A company safety committee has been established composed of labor and management personnel. When possible, new employees will be rotated on to the committee to provide new enthusiasm and perspectives on safety in the workplace.

The safety committee functions/responsibilities are as follows:


- Meets regularly, but not less than quarterly;
- Prepares and makes available to the affected employees, written records of the safety and health issues discussed at committee meetings, and maintained for review by the Division upon request. The committee meeting records will be maintained for one (1) year;
- Reviews results of the periodic, scheduled worksite inspections;
- Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submits suggestions to management for the prevention of future incidents;
- Review investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions;
- Submits recommendations to assist in the evaluation of employee safety suggestions; and
- Upon request from the Division verifies abatement action taken by the employer to abate citations issued by the Division.

The safety committee meets on a monthly basis to discuss current safety issues and to conduct a safety audit of the job site(s). These activities will be documented using the attached Minutes of Safety Committee Meeting Form.

Hazard Identification – Inspections & Abatement

Trinity has a system for identifying and evaluating workplace hazards whenever new substances, procedures or process are introduced into the workplace. This system requires periodic inspections for safety and health hazards. All inspections are to be documented. Hazards must be corrected in order of priority based on severity in an expeditious manner.

The Training and Compliance Manager will inspect each of the operation's facilities monthly. During the inspection, the manager will record the hazards or unsafe procedures observed

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during the inspection. One copy of the report will be filed at the main office and another copy will be sent to the supervisor directly responsible for the location or work procedure.

Each supervisor receiving an inspection report that has corrections to be made must respond, in writing, to the manager within 7 days. The response will note the estimated time to make necessary corrections or to develop alternative work procedures as uncovered during the inspection. The supervisor's response may also include other suggestions to improve the safety within his or her area of responsibility.

The Training and Compliance Manager will reinspect the areas that were found to be unsafe during the inspection within 14 days of the original inspection and each 7 day period thereafter until the hazards are corrected.

Other inspections will be conducted:

- Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and
- Whenever the Company is made aware of a new or previously unrecognized hazard.

When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/ or property, the Company will remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided the necessary safeguards.


Trinity has a system for employees to report safety and health hazards/problems effectively and anonymously without fear of reprisal. This system incorporates the use of a Safety Suggestion Box. Safety hazards and/or suggestions for safety improvement can be dropped in the Safety Suggestion Box.

Accident Investigation

It is the policy of Trinity that all work related accidents, injuries and illnesses are to be conducted in a professional manner to identify probable causes and are used to develop specific management actions for the prevention of future accidents. Every minor or non-disabling injury will be investigated with the same vigor and thoroughness as serious injuries. Proper and complete investigation of these injuries can be an effective injury prevention tool. The Safety Committee will be responsible for conducting accident investigations.

All accident investigations will be conducted as soon as possible, within 48 hours. All accident investigations will be documented using the attached Accident Investigation Report Form. While conducting accident investigations, particular attention will be given to suggesting ways to prevent future occurrences of the events which caused the accident and corrective action to be taken.

All pictures should be identified. Let people know on tape that they are being recorded. Also, make sure that the names and addresses and day and evening phone numbers of all eye

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witnesses are noted or recorded. If a formal police report or other official investigation is conducted by any government agency, get the name and badge number of the official, or a business card, and find out when a copy of the official report will be available to the public. If you are requested to make a statement, you have the right to have the Company lawyer attend your statement at no cost to you.

A satisfactory accident report will answer the following questions:

1. What happened? The investigation report should begin by describing the accident, the injury sustained, the eyewitnesses, the date, time and location of the incident and the date and time of the report. Remember: who, what, when, where and how are the questions that the report must answer.
2. Why did the accident occur? The ultimate cause of the accident may not be known for several days after all the data are analyzed. However, if an obvious cause suggests itself, include your conclusions as a hypothesis at the time you give your information to the person in charge of the investigation.
3. What should be done? Once a report determines the cause of the accident, it should suggest a method for avoiding future accidents of a similar character. This is a decision by the Responsible Safety Officer and the supervisor on the project, as well as top management. Once a solution has been adopted, it is everyone's responsibility to implement it.
4. What has been done? A follow up report will be issued after a reasonable amount of time to determine if the suggested solution was implemented, and if so, whether the likelihood of accident has been reduced.

Records

Trinity maintains records of employee training, hazard identification and abatement, and accident investigation.


OSHA Records Required

Copies of required accident investigations and certification of employee safety training will be maintained by the Responsible Safety Officer.

Trinity keeps records of its employee fatalities, injuries, and illnesses that:

- Is work-related; and
- Is a new case; and
- Meets one or more of the general recording criteria of applicable regulations.

Each recordable injury or illness is entered on OSHA 300 Log of Work-Related Injuries and Illnesses, OSHA 301 Form Injury and Illness Incident Report, and a separate, confidential list of privacy-concern cases, if any, within (7) calendar days of receiving information that a recordable injury or illness has occurred. The Operations Manager keeps these records up to date.

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If there is a privacy-concern case, we have the option to not enter the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses. Instead, the text "Privacy Case" is entered in the space normally used for the employee's name. This will protect the privacy of the injured or ill employee when another employee, a former employee, or an authorized employee representative is provided access to the OSHA 300 Log. The company will keep a separate, confidential list of the case numbers and employee names for your privacy concern cases so that we can update the cases and provide the information to the government if asked to do so.

At the end of each calendar year, Operations Manager performs the following steps:

1. Reviews OSHA 300 Log of Work-Related Injuries and Illnesses to verify that the entries are complete and accurate,
2. Corrects any deficiencies identified in the entries,
3. Creates an annual summary of injuries and illnesses recorded on OSHA 300 Log of Work-Related Injuries and Illnesses,
4. Ensures that the Operations Manager and "President" of the company certifies that he reasonably believes, based on his/her knowledge of the process by which the information was recorded, that the annual summary is correct and complete, and
5. Posts OSHA 300-A Summary of Work-Related Injuries and Illnesses on the Main Office bulletin board from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

All employees, former employees, their personal representatives, and their authorized employee representatives have a right to access our regulatory-required injury and illness records, with the following limitations:

1. We are allowed to give the requester a copy of OSHA 300 Log of Work-Related Injuries and Illnesses by the end of the next business day.
2. We may choose to not record the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses in order to protect the privacy of injured and ill employees in certain privacy-concern cases.
3. We are allowed to give an employee, former employee, or personal representative a copy of OSHA 301 Form Injury and Illness Incident Report by End of the next business day. A personal representative is:
 - Any person that the employee or former employee designates as such, in writing; or
 - The legal representative of a deceased or legally incapacitated employee or former employee.
4. We are allowed to give authorized employee representatives under a collective bargaining agreement a copy of OSHA 301 Form Injury and Illness Incident Report within seven (7) calendar days.
5. An authorized employee representative is an authorized collective bargaining agent of employees. The authorized employee representative will be provided the OSHA 301 Incident Report section titled 'Tell us about the case.' The company will remove all other information from the copy of the OSHA 301 Incident Report or the equivalent substitute form that is given to the authorized employee representative.

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6. While the first copy is free, we may charge a reasonable amount for retrieving and copying additional copies.
7. Employees also have access to OSHA 300-A Summary of Work-Related Injuries and Illnesses, which is posted on the Main Office bulletin board from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

Trinity does not discriminate against employees who request access to any records or otherwise exercise any rights afforded by the OSH Act.

The Operations Manager saves the following records for (5) years following the end of the calendar year that these records cover:

- OSHA 300 Log, the privacy case list (if one exists),
- the annual summary, and
- the OSHA 301 Incident Report forms.


During the storage period, The Operations Manager updates OSHA 300 Log of Work-Related Injuries and Illnesses to include any newly discovered recordable injuries or illnesses and any changes that have occurred in the classification of previously recorded injuries and illnesses. If our company changes ownership, the Operations Manager and the President are responsible for transferring the records to the new owner.

Safety Equipment

Proper safety equipment is necessary for your protection. The Company provides the best protective equipment it is possible to obtain. Use all safeguards, safety appliances, or devices furnished for your protection and comply with all regulations that may concern or affect your safety. Wear your gear properly -- all snaps and straps fastened, cuffs not cut or rolled. Your supervisor will advise you as to what protective equipment is required for your job. Certain jobs require standard safety apparel and appliances for the protection of the employee. Your supervisor is aware of the requirements and will furnish you with the necessary approved protective appliances.

These items will be worn and effectively maintained as a condition of your continued employment and part of our mutual obligation to comply with the Occupational Safety and Health Act. Safety goggles, glasses and face shields will correspond to the degree of hazard, i.e., chemical splashes, welding flashes, impact hazard, dust, etc. Do not alter or replace an approved appliance without permission from your supervisor. Rubber gloves and rubber aprons will be worn when working with acids, caustics or other corrosive materials. Specified footwear must be worn. No jewelry will be worn around power equipment. Hearing protection appliances (approved muffs or plugs) will be worn by all employees working within any area identified as having excess noise levels. Your supervisor will instruct you in the proper use of the appliance.

Protective Equipment / Clothing

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Proper safety equipment is necessary for your protection. The Company provides the best protective equipment it is possible to obtain. Use all safeguards, safety appliances, or devices furnished for your protection and carry out all regulations that may concern or affect your safety. Wear your gear properly - all snaps and traps fastened, cuffs not cut or rolled. Your supervisor will advise you as to what protective equipment is required for your job.

Smoking & Fire Safety

Fire is one of the worst enemies of any facility. Learn the location of the fire extinguishers. Learn how to use them. You can help prevent fires by observing the smoking rules:

- Smoking is not allowed on the site, except in designated areas.
- Smoking is not permitted in restrooms.
- If you are not sure about where you may smoke, ask the supervisor.

Reporting

All serious accidents must be reported to OSHA. In cases of hospitalization or death, a full investigation with copies to governmental authorities will be required. In less serious cases, the investigation report must be presented to the company for disclosure to its insurance carrier and for remedial action at the work site.

