



DESERT SERVICES

The Ultimate in Construction Services

Desert Services

Health and Safety Plan



Desert Services – Leadership Commitment to Safety and Compliance

At **Desert Services**, the safety of our employees, trade partners, and the clients we serve is our top priority. As a team, we are fully committed to fostering a safety-first culture across all operations—from field services to support teams.

We understand that our success depends not only on productivity and quality but also on our ability to send every team member home safely each day. Our commitment is built on the following pillars:

1. Compliance with OSHA Standards:

We follow all applicable **OSHA 29 CFR 1926** construction safety standards and actively monitor changes in regulations to ensure our policies remain up-to-date and effective. We also comply with **ADOSH** (Arizona Division of Occupational Safety and Health) requirements to address region-specific risks such as heat illness and dust exposure.

2. Employee Training and Competency:

Every Desert Services employee receives initial and ongoing safety training tailored to their role and tasks. This includes HAZCOM, fall protection, forklift training, equipment operation, and site-specific pre-task planning. Our safety team ensures that only trained and competent personnel operate machinery or perform high-risk tasks.

3. Empowered Safety Culture:

Our supervisors, foremen, and field leaders are trained as **competent persons** under applicable OSHA subparts to proactively identify and mitigate hazards. Every team member is encouraged to speak up, stop work if unsafe conditions are present, and actively participate in our safety improvement initiatives without fear of retaliation.

4. Incident Prevention and Response:

We perform regular job site inspections, enforce the use of proper PPE, and maintain up-to-date emergency response procedures. When incidents occur, we prioritize timely reporting, thorough investigation, and corrective actions that focus on prevention and accountability—not blame.



5. Continuous Improvement:

Safety at Desert Services is not a checkbox—it's a daily commitment. We evaluate our processes, collect field data, and listen to our employees to continuously improve our Health and Safety Program. Leadership meets regularly with our Safety Consultants to review performance metrics, audit results, and resource needs.

We believe that **no job is so urgent or important that it cannot be done safely**, and we stand behind that belief with the resources, training, and leadership necessary to protect our people and keep our job sites compliant and secure.

— **Desert Services Leadership Team**



Desert Services – Employee Commitment to Safety and Accountability

As employees, managers, and field staff of **Desert Services**, we are proud to be part of a company that values safety, integrity, and professionalism. We understand that safety is not just the responsibility of the safety department or leadership—it's a shared responsibility that begins with each of us.

We recognize that the nature of our work in roll-off services, street sweeping, SWPPP compliance, temporary fencing, and support logistics presents a wide range of hazards. Because of this, we are committed to upholding the highest standards of safety and compliance every day, on every site.

Our Commitment Includes:

1. Working Safely—Always

We will approach every task with safety as the first priority. We commit to using the correct PPE, following all procedures, and stopping work immediately if conditions become unsafe. We will never take shortcuts that compromise safety.

2. Participation in Training and Pre-Task Planning

We will attend all required safety training and actively engage in tailgate meetings and pre-task planning discussions. We understand that these are essential to preventing incidents and ensuring everyone understands their role and the associated risks before starting work.

3. Open Communication

We will speak up when we see something unsafe, report all incidents and near-misses honestly, and bring forward suggestions that could make our work environment safer. We will support a culture where no concern is too small to raise.

4. Following Company and OSHA Standards

We will follow all safety policies and procedures set forth by Desert Services and required by OSHA. This includes daily equipment checks, proper handling of tools and materials, and adherence to vehicle safety and traffic control protocols.



5. Supporting One Another

We will watch out for our coworkers, mentor new employees on safe practices, and help create a jobsite culture where safety is everyone's job. We believe in looking out for the person next to us as much as ourselves.

What the Leadership Team Should Expect from Us:

- **Consistency** in applying safe work practices on every job, not just when observed.
- **Accountability** in owning our roles, responsibilities, and any mistakes.
- **Professionalism** in representing Desert Services with respect for the rules, the site, and our clients.
- **Feedback** that helps leadership understand what's working and what could improve in the field.

We are committed to being not just safe workers, but **leaders of safety** in our own right. Together with the Desert Services leadership team, we will ensure that safety is not a slogan, but a daily practice.

— *Desert Services Field and Operations Team*



Job Hazard Analysis (JHA)

Purpose

Desert Services is committed to maintaining a safe and compliant workplace through the proactive identification and control of jobsite hazards. The **Job Hazard Analysis (JHA)** process is a core part of our Health and Safety Program. It ensures that every task—across all service lines—is assessed for risk and that mitigation strategies are implemented before work begins.

Scope

JHAs are required for all routine and non-routine tasks performed by Desert Services employees, including:

- Street sweeping (manual and mechanical)
 - Temporary fencing installation/removal
 - SWPPP (stormwater pollution prevention plan) compliance work
 - Roll-off dumpster delivery, pickup, and disposal
 - Pressure washing (equipment, pavement, surfaces)
 - Portable restroom delivery, servicing, and sanitation
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JHA Development Responsibilities

- **Supervisors and field leads** are responsible for preparing and reviewing JHAs for all applicable tasks prior to project mobilization or task changes.
 - A **competent person** must be involved in identifying foreseeable hazards.
 - All **crew members** performing the task must participate in the review and acknowledgment of the JHA before work begins.
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JHA Process Overview

Each JHA shall include the following components:

1. Task Description:

Clearly define the scope of work (e.g., “Deliver roll-off dumpster to commercial site”).

2. Step-by-Step Job Tasks:

Break down the job into sequential steps (e.g., drive to site, back up to drop location, disengage roll-off container).

3. Hazard Identification:

Identify potential hazards for each step (e.g., traffic hazards, pinch points, slip/trip hazards, hazardous materials exposure).

4. Risk Assessment:

Consider severity and likelihood to prioritize hazard control (e.g., use a risk matrix if applicable).

5. Control Measures:

Determine methods to eliminate or reduce hazards using the **hierarchy of controls**:

- Elimination/Substitution (if applicable)
- Engineering Controls (e.g., backup alarms, guarding)
- Administrative Controls (e.g., flaggers, spotters, SOPs)
- Personal Protective Equipment (PPE)

6. Training and Communication:

Ensure all employees are trained on the JHA content and confirm understanding via tailgate sign-in.



Examples of Task-Specific Hazards & Controls

Task	Common Hazards	Sample Control Measures
Street Sweeping	Traffic, dust inhalation, noise	Flaggers, high-vis gear, dust masks, hearing protection
Temporary Fencing	Manual lifting, sharp edges, unstable ground	Gloves, lifting techniques, stake drivers, level placement
SWPPP Work	Slips in wet areas, contact with pollutants	Boots with traction, gloves, SDS review for chemicals
Roll-off Services	Backing up, load shifting, line-of-fire	Use spotter, chock wheels, verify clear drop zone
Pressure Washing	Water spray injuries, electrocution (if near outlets)	GFCI protection, face shields, hose inspection
Sanitary Services	Biohazard exposure, lifting strain	Disposable gloves, mask, use of dolly or team lift

Review and Updates

- JHAs must be reviewed **before each new job** or when conditions change.
- Any incident, near-miss, or equipment modification will trigger a **JHA reassessment**.
- All completed JHAs are maintained on-site and filed with the Safety Department.

Field Expectations

- No employee shall begin a task until they have read and understood the applicable JHA.
- All field teams must have access to the JHA throughout the work shift (physically or digitally).
- Supervisors are expected to **audit JHA compliance** as part of routine safety checks.



Emergency Action Plan (EAP)

Purpose

Desert Services is committed to protecting the health and safety of employees, trade partners, and the public in the event of any emergency. This **Emergency Action Plan (EAP)** provides standardized procedures to ensure a quick and effective response to incidents such as medical emergencies, fires, fuel or chemical spills, and severe weather events.

This plan complies with **OSHA 29 CFR 1926.35 and 1910.38**, and applies to all Desert Services operations, including roll-off services, street sweeping, SWPPP, temporary fencing, pressure washing, and sanitary services.

1. First Aid and Medical Response Procedures

- **First Aid Trained Personnel:**

At least one employee per crew must be trained in first aid and CPR.

- **Basic Procedures:**

- Evaluate the scene for safety.
- Contact **911** for any life-threatening injuries or conditions.
- Render first aid within the limits of your training.
- Do not move the injured unless necessary for safety.
- Notify site supervisor and complete incident report.

- **Medical Facilities:**

Each crew must know the **location and address of the nearest medical facility**. A map and phone number shall be kept in every work vehicle.

- **Reporting:**

All injuries, regardless of severity, must be reported to the supervisor immediately and documented.



2. Fire Prevention and Extinguishing

- **General Prevention Measures:**

- No smoking near flammable liquids or active fueling.
- Keep work areas free from combustible debris.
- Fuel and oil must be stored in approved containers.

- **Fire Extinguishers:**

- Every work vehicle must be equipped with an **ABC-rated fire extinguisher**.
- Extinguishers must be inspected **monthly** and checked before each shift.

- **Fire Response Procedures:**

- Sound alarm or notify others nearby.
- Evacuate the area immediately.
- Call **911**.
- Use extinguisher **only if trained** and safe to do so.

3. Spill Response (Fuel, Oil, Biohazards)

- **Common Spill Hazards:**

- Hydraulic fluid or oil leaks from equipment
- Fuel spills during refueling
- Human waste spills from portable restrooms

- **Response Protocol:**

- Stop source of spill if safe.
- Use absorbent pads or spill kit materials to contain.
- Notify supervisor and environmental coordinator.
- For major spills, call **911** or **local hazmat** team.



- **Waste Disposal:**

All spill materials and PPE used during cleanup must be disposed of as **regulated waste** per local and state regulations.

- **Spill Kits:**

Each service truck and jobsite shall have a stocked spill kit.

4. Severe Weather Response

- **Heat Stress:**

- Follow the Heat Illness Prevention Plan (HIPPP).
- Provide water, shade, and frequent breaks.
- Monitor for signs of heat exhaustion and stroke.

- **High Wind / Lightning:**

- Cease installation of fencing, canopy tents, or equipment use.
- Take shelter in a vehicle or enclosed structure.
- Do not resume work until conditions are declared safe by supervisor.

- **Flooding / Storm Water Risks (SWPPP):**

- Inspect BMPs and barriers.
 - Secure materials and prevent contamination of storm drains.
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5. Emergency Contacts

Post these numbers at job trailers, on service vehicles, and in field books:

Emergency Type	Contact	Number
Medical/Fire/Police	Emergency Services	911
Nearest Hospital	[Insert Facility Name] [Phone Number]	
Field Safety Manager	[Insert Name]	[Phone Number]
Project Supervisor	[Insert Name]	[Phone Number]
Spill Response Contractor (if applicable)	[Insert Name]	[Phone Number]

Crew Responsibilities

- All field employees must be trained on this plan during new hire orientation and annual refreshers.
- Supervisors must ensure emergency contact numbers are accessible on-site.
- Desert Services employees must **follow the chain of command** in emergencies and report incidents immediately.



Personal Protective Equipment (PPE)

Purpose

The purpose of this section is to ensure that all Desert Services employees understand and comply with Personal Protective Equipment (PPE) requirements to protect against workplace hazards. This section aligns with **OSHA 29 CFR 1926 Subpart E** and applies to all field operations including street sweeping, roll-off services, SWPPP work, temporary fencing, pressure washing, and sanitary services.

1. Minimum PPE Requirements

The following PPE must be worn by all Desert Services field employees at all times:

- **Hard hat** (ANSI Z89.1 compliant)
 - **High-visibility safety vest or shirt** (Class 2 or Class 3, depending on work zone requirements)
 - **Safety glasses or impact-rated eye protection** (ANSI Z87.1)
 - **Work gloves** appropriate for the task
 - **Steel-toe or composite safety boots** (ANSI Z41 or ASTM F2413 compliant)
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2. Task-Specific PPE Requirements

In addition to minimum requirements, employees must use additional PPE for specific tasks, including:

- **Street Sweeping:** Respiratory protection (N95 or higher) if dust levels exceed safe thresholds; hearing protection for prolonged exposure to equipment noise.
 - **Roll-off Dumpster Work:** Cut-resistant gloves for handling sharp materials; back support belts when lifting heavy loads.
 - **Temporary Fencing:** Eye protection and gloves when driving stakes or handling tension wire; steel toe boots to prevent crushing injuries.
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- **SWPPP Activities:** Rubber boots and chemical-resistant gloves when dealing with contaminated water or BMP systems.
 - **Pressure Washing:** Face shield in addition to eye protection; water-resistant outerwear to protect against high-pressure spray.
 - **Sanitary Services (Porta Johns):** Disposable gloves, face shield, and respiratory protection when potential exposure to biohazards exists.
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3. Responsibility and Enforcement

Supervisors are responsible for ensuring that:

- Required PPE is issued, maintained, and available on-site.
- Workers are trained in proper use and care of all PPE.
- Field inspections confirm compliance with PPE use policies.

Employees are expected to:

- Inspect their PPE daily for damage or wear.
 - Report any defective or missing PPE immediately.
 - Use assigned PPE properly and consistently.
 - Understand that failure to wear required PPE may result in disciplinary action under Desert Services' safety policy.
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4. Training

All employees will receive PPE training during:

- **New hire orientation**
- **Task-specific instruction**, when new equipment or hazards are introduced
- **Annual safety refresher sessions**

Training includes proper PPE selection, usage, maintenance, limitations, and disposal when applicable.



Vehicle and Equipment Safety

Purpose

This section establishes safety procedures and responsibilities related to the use of all vehicles and mobile equipment operated by Desert Services personnel. This includes sweepers, service trucks, roll-off trucks, pickup trucks, and trailers. These procedures are intended to reduce risk of injury, property damage, and regulatory non-compliance.

All procedures align with **OSHA 29 CFR 1926.601 (Motor Vehicles), 1926.602 (Earthmoving Equipment)**, and applicable DOT/FMCSA rules.

1. Pre-Trip Inspections

- Operators are required to perform a **documented pre-trip inspection** before the use of any vehicle or equipment.
 - Inspections must include (at minimum):
 - Tire pressure and condition
 - Lights and signals
 - Brakes and horn
 - Mirrors and camera systems
 - Fluid levels and leaks
 - Safety equipment (fire extinguisher, spill kit, first aid)
 - Any deficiencies must be reported **immediately** to the supervisor or maintenance manager, and the equipment must be tagged **out of service** if unsafe to operate.
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2. Backup Alarms, Spotters, and Camera Systems

- All service and delivery vehicles must have **functional backup alarms**.
 - Operators must use **spotters** any time they are:
 - Backing up in congested areas
 - Maneuvering near pedestrians or tight clearance zones
 - Operating in areas where vision is obstructed
 - Vehicles equipped with **backup cameras** are still required to use mirrors and spotters; cameras are a secondary aid, not a substitute for physical checks.
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3. Safe Loading and Unloading of Dumpsters

- Only trained and authorized personnel may operate roll-off equipment.
 - Prior to loading or unloading:
 - Inspect the ground for stability and grade
 - Ensure the area is clear of personnel and obstructions
 - Use wheel chocks if required
 - Always verify that dumpster doors are latched and loads are secured.
 - Stay out of the line of fire and avoid pinch/crush zones during lift operations.
 - Never climb on top of dumpsters during placement or retrieval.
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4. Maintenance and Documentation Protocols

- All company vehicles and equipment must follow a **routine maintenance schedule** based on manufacturer recommendations and usage.
 - Maintenance activities must be logged, including:
 - Service dates
 - Inspections
 - Repairs
 - Parts replacement
 - Operators are responsible for reporting mechanical issues and ensuring that **daily inspection logs** are turned in as required.
 - Any unsafe vehicle or equipment must be removed from service until repaired and cleared by a qualified technician.
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5. Sweeper and Service Truck Operation Safety

- **Street sweepers** must only be operated by trained and authorized personnel.
 - Operators must monitor surrounding traffic and wear high-visibility gear.
 - Routes should be pre-planned, and signage deployed if sweeping near active roadways.
 - **Service trucks** carrying fuel, water, or waste must be secured, and load limits followed.
 - Ensure tanks are properly vented and valves closed.
 - Use wheel blocks when parked on incline during servicing operations.
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Employee Responsibilities

- Operate vehicles and equipment in accordance with training, safety rules, and state/federal laws.
- Perform inspections thoroughly and report hazards or defects without delay.
- Never operate a vehicle or equipment you are not trained or authorized to use.
- Drive defensively and avoid distractions (no texting, eating, or phone calls while driving).



Traffic Control and Work Zone Safety

Purpose

This section outlines the procedures and controls used to protect Desert Services employees, trade partners, and site personnel from vehicle-related hazards **within active job sites**. These areas may include construction access roads, staging yards, parking lots, and service lanes where heavy equipment, delivery vehicles, or sweepers operate in close proximity to pedestrian traffic.

1. Signage and Internal Traffic Controls

- Traffic signs must be used to **identify active work zones**, direct vehicle routing, and communicate pedestrian restrictions within the job site.
 - Typical signage includes:
 - “Authorized Vehicles Only”
 - “Slow – Workers Present”
 - “No Pedestrian Access”
 - Signs must be **clearly visible**, secured upright, and removed once work is complete.
 - Internal traffic control plans (ITCPs) should be developed on large or high-traffic sites and include:
 - Designated travel paths for vehicles and sweepers
 - Pedestrian-only walkways
 - Entry and exit zones for service trucks and dumpsters
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2. Use of Spotters and Delineators

- Spotters are **mandatory** when:
 - Backing equipment into tight or congested areas
 - Operating near active pedestrian zones or building entrances
 - Placing or removing dumpsters within close proximity to other trades
 - Delineators, cones, and barriers must be used to:
 - Mark off active service or sweeping zones
 - Prevent entry into blind spots or danger areas
 - Guide vehicles through narrow access routes
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3. High-Visibility Clothing and Vehicle Marking

- All Desert Services field employees working around moving equipment must wear **high-visibility Class 2 vests or shirts** at minimum.
 - Class 3 garments may be required during **low-light or night work**, or when visibility is obstructed by structures or weather.
 - Service vehicles and sweepers operating inside job sites must:
 - Display **flashing amber lights or strobes**
 - Use **hazard flashers** when parked in work zones
 - Be parked in a way that does **not block fire lanes, access gates, or emergency exits**
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4. Coordination with Site Supervision and Trades

- Before performing any high-exposure activity (dumpster drops, sweeping, fencing in drive lanes), crews must:
 - Notify the **general contractor or site superintendent**
 - Coordinate with adjacent trades to **minimize overlap**
 - Review **access routes and no-go zones** during daily pre-task meetings
 - Only authorized personnel are permitted to direct or signal vehicle movements inside the site.
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Employee Responsibilities

- Be aware of all moving equipment and vehicle routes during operations.
- Set up and remove signage and barriers **per the pre-task plan**.
- Never walk between moving trucks and fixed objects without clear communication.
- Use radios or hand signals when required to maintain visibility with spotters and operators.



Exposure Controls

Purpose

This section establishes procedures for identifying, minimizing, and controlling employee exposure to hazardous materials and environmental contaminants encountered during Desert Services operations on construction job sites. This includes managing dust, chemicals, sewage, wastewater, and stormwater pollutants in accordance with **OSHA regulations, EPA requirements, and SWPPP standards.**

1. Dust Suppression During Sweeping

- Dust generated during mechanical sweeping can pose respiratory hazards and visibility issues.
 - **Required Controls:**
 - All sweepers must be equipped with **operational dust suppression systems** (e.g., onboard water spray).
 - In dry conditions, **pre-wet areas** with water or environmentally safe dust suppressants before sweeping.
 - Operators must wear **N95 or higher respiratory protection** if airborne dust levels are excessive or suppression systems fail.
 - Sweepers must avoid disturbing dry piles of sediment or debris—moisten prior to removal.
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2. Handling of Wastewater and Sewage (Portable Restrooms)

- Waste from portable restrooms must be handled as a **regulated biohazard** and disposed of in accordance with **state and local health department rules**.
 - **Controls and Procedures:**
 - Use only trained and authorized personnel to service units.
 - Wear required **PPE**: disposable gloves, splash-resistant goggles or face shield, and protective outerwear.
 - Never dispose of wastewater in storm drains, jobsite trenches, or open ground.
 - Transport waste in sealed containers to **approved disposal facilities** only.
 - Spills must be immediately contained and cleaned using **biohazard spill kits**.
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3. Hazard Communication Program

- Desert Services maintains a comprehensive **Hazard Communication (HAZCOM) Program** compliant with **OSHA 29 CFR 1910.1200 / 1926.59**.
 - **Program Elements:**
 - **Safety Data Sheets (SDS)** must be accessible to all field employees for cleaning chemicals, fuels, and degreasers used in pressure washing and maintenance.
 - All containers must be **properly labeled** with the product name and hazard warnings.
 - Employees must receive training on:
 - Chemical handling and storage
 - PPE requirements
 - Spill response and emergency procedures
 - **No chemical mixing** is allowed unless instructed and authorized by the Safety Manager.
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4. SWPPP Compliance for Sediment and Erosion Control

- Desert Services is responsible for implementing Best Management Practices (BMPs) per each project's **Stormwater Pollution Prevention Plan (SWPPP)**.
 - **Field BMP Compliance Includes:**
 - Maintaining silt fences, wattles, inlet protection, and other barriers in working condition
 - Preventing pressure washing runoff from entering storm drains
 - Staging dumpsters, fencing, and equipment on **stable surfaces** away from drainage paths
 - Cleaning up loose sediment or materials that could enter the stormwater system
 - **Documentation & Reporting:**
 - Crews must report damaged BMPs or erosion risks to the SWPPP Inspector or site superintendent immediately.
 - All corrective actions must be logged in **daily field reports**.
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Employee Responsibilities

- Follow all procedures for chemical handling, dust control, and biohazard cleanup as trained.
- Wear required PPE and report any failure of dust suppression, containment, or control systems.
- Immediately notify supervisors of spills, unsafe discharges, or damaged SWPPP controls.
- Know the location of SDS binders and the nearest eyewash or rinse station.



Hazard Communication

Purpose

The purpose of this section is to ensure that all Desert Services employees are informed of the hazardous chemicals they may encounter on job sites and during service operations. This program is designed to comply with **OSHA's Hazard Communication Standard (29 CFR 1910.1200 / 1926.59)** and the **Globally Harmonized System (GHS)** for classification and labeling of chemicals.

This section applies to all Desert Services personnel who handle, store, or may be exposed to substances such as cleaning agents, fuels, degreasers, disinfectants, and other hazardous materials used in the course of their duties.

1. Safety Data Sheets (SDS)

- A current **Safety Data Sheet (SDS)** must be available for every chemical product used or stored by Desert Services.
- SDSs must be:
 - Stored in **clearly labeled binders** kept on each service truck and in main storage areas.
 - Accessible to employees **during all working hours**, both in the field and at the yard.
- Supervisors are responsible for ensuring SDS binders are complete and up to date.



2. Labeling Requirements

- All containers (including secondary bottles) must be clearly labeled with:
 - **Product name**
 - **Hazard symbols or pictograms**
 - **Signal word** (e.g., Danger or Warning)
 - **Hazard statements** and precautionary instructions
 - Labels must be legible, weather-resistant, and match the information found on the SDS.
 - No unlabeled or improperly labeled containers may be used or stored on-site.
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3. Chemical Handling Procedures

- Only employees who have received hazard communication training may handle hazardous substances.
 - Chemicals must be:
 - Stored away from heat sources and ignition hazards
 - Secured during transport to prevent spills or leaks
 - Never mixed unless directed by a supervisor and supported by manufacturer guidance
 - Proper **PPE must be worn** based on the chemical's SDS, which may include:
 - Gloves (nitrile or chemical-resistant)
 - Safety glasses or splash goggles
 - Face shields
 - Respiratory protection, if required
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4. Employee Training

- All employees will receive **initial hazard communication training** during onboarding and **annual refresher training**.
 - Training covers:
 - How to read and interpret SDSs and GHS labels
 - Proper chemical handling, storage, and use
 - Spill response and emergency procedures
 - PPE selection and use
 - Rights under the OSHA HAZCOM standard (Right-to-Know)
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5. Spill and Exposure Response

- In the event of a spill:
 - Alert all personnel and isolate the area
 - Use a spill kit or absorbent materials to contain the chemical (if safe to do so)
 - Notify the supervisor and Safety Manager immediately
 - Dispose of all cleanup materials per SDS instructions
 - For exposures (skin, inhalation, ingestion):
 - Follow SDS first aid instructions
 - Seek medical attention as needed
 - Report the incident for documentation and follow-up
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Employee Responsibilities

- Review chemical labels and SDSs before using any substance.
- Store and transport chemicals safely and in labeled containers.
- Wear required PPE and follow all handling instructions.



- Report any chemical-related incident, exposure, or label/SDS deficiency immediately.



Sanitation and Hygiene

Purpose

This section establishes procedures for maintaining personal hygiene, safe handling of portable restrooms, and proper disposal of wastewater generated during Desert Services operations. These protocols help prevent the spread of illness, contamination of job sites, and non-compliance with environmental regulations. All procedures comply with **OSHA 29 CFR 1926.51 (Sanitation)** and applicable **EPA and local wastewater disposal codes**.

1. Safe Handling and Disinfection of Portable Toilets

- Only trained personnel may perform service, delivery, and disinfection of portable toilet units.
 - Units must be:
 - Inspected before deployment for structural integrity and cleanliness
 - Disinfected thoroughly between uses or relocations
 - Stabilized properly to prevent tipping on job sites
 - During service or pump-out:
 - Use **approved vacuum equipment** and tightly sealed hoses
 - Wear **gloves, safety glasses or face shield, and protective outerwear**
 - Keep public access areas clear during servicing
 - After contact with wastewater or surfaces, tools and equipment must be sanitized using **EPA-approved disinfectants**.
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2. Personal Hygiene Requirements

- Employees must wash or sanitize hands:
 - Before eating, drinking, or smoking
 - After using portable restrooms
 - After handling waste, chemicals, or soiled equipment
 - Portable handwashing stations or sanitizer units must be available:
 - At job sites where restrooms are provided
 - On each service truck handling sanitation operations
 - PPE such as **gloves** must be worn when handling waste or cleaning agents and replaced regularly.
 - Employees are responsible for maintaining personal hygiene and are encouraged to report unsanitary conditions immediately.
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3. Wastewater Disposal Practices

- Wastewater collected from portable toilets and wash stations must only be disposed of at **approved municipal or industrial wastewater treatment facilities**.
 - **Do NOT** discharge waste:
 - Into storm drains or sewer manholes
 - Onto job site ground or landscaped areas
 - In unauthorized receptacles or construction containers
 - Disposal records must be maintained and available upon request by regulatory agencies or project managers.
 - Spills or unauthorized discharges must be immediately reported to the **Safety Manager and local environmental authority**, followed by proper containment and cleanup procedures.
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Employee Responsibilities

- Follow all procedures for sanitation service, hygiene practices, and waste disposal.
- Wear assigned PPE and replace gloves or protective gear if contaminated or damaged.
- Maintain clean and organized work areas, especially around sanitation units and service trucks.
- Report any hygiene deficiencies, equipment failures, or wastewater spills without delay.



Documentation & Recordkeeping

Purpose

This section outlines the documentation and recordkeeping requirements necessary to maintain regulatory compliance, track safety performance, and ensure accountability within Desert Services' operations. Accurate and organized records support OSHA compliance, enable trend analysis, and help verify employee training and equipment readiness.

This section complies with applicable requirements under **OSHA 29 CFR 1904 (Recording and Reporting Occupational Injuries and Illnesses)** and 1926 subpart-specific documentation standards.

1. Training Logs

- All employee safety training must be **documented and retained** for a minimum of three years.
- Training records must include:
 - Employee name and job title
 - Date and type of training
 - Instructor or facilitator name
 - Signature of employee confirming participation
- Required training records include, but are not limited to:
 - **Hazard Communication (HAZCOM)**
 - **Driver and equipment operation safety**
 - **Personal Protective Equipment (PPE)**
 - **Spill response and emergency procedures**
 - **Job Hazard Analysis (JHA) reviews**
- Records must be made available to OSHA, clients, or project managers upon request.



2. Equipment Inspections and Maintenance Logs

- All vehicles and equipment must have **documented pre-use inspection forms** and **maintenance history logs**.
 - Inspection forms should include:
 - Operator's name
 - Equipment/vehicle ID
 - Items checked and any deficiencies noted
 - Time/date of inspection
 - Maintenance logs must record:
 - Service dates and completed tasks
 - Parts replaced or repaired
 - Name of technician or maintenance provider
 - Records are retained in vehicle binders or electronically in the equipment database.
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3. Incident and Near-Miss Reports

- Any **injury, property damage, or near-miss** must be reported immediately and documented within 24 hours.
 - Reports must include:
 - Names of persons involved and witnesses
 - Description of the event
 - Root cause analysis
 - Corrective actions taken
 - All incidents are reviewed by the **Safety Manager** and filed for use in future training and trend analysis.
 - Serious incidents or OSHA recordables are also logged on the **OSHA 300, 300A, and 301** forms as required.
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4. Safety Audits and Correction Tracking

- Regular **job site safety audits and inspections** must be documented and include:
 - Date and location
 - Observations and deficiencies
 - Photos (if applicable)
 - Recommended corrective actions and deadlines
 - Corrective actions must be tracked until completion.
 - Supervisors are responsible for ensuring documentation is closed out and uploaded to the safety record system.
 - Audit findings may be reviewed during **monthly safety meetings** for trend analysis and policy updates.
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Employee and Supervisor Responsibilities

- Field staff must complete inspection forms and turn in documentation as instructed.
- Supervisors must ensure logs are accurate, legible, and submitted on time.
- The **Safety Consultant** is responsible for centralizing, organizing, and archiving all records and ensuring availability for audits or compliance reviews.



Training Requirements

Purpose

This section outlines the safety training standards for all Desert Services employees, with the goal of ensuring competency, regulatory compliance, and protection from workplace hazards. Training is tailored by role and task and aligns with applicable **OSHA standards**, **DOT requirements**, and best industry practices. Ongoing training helps reinforce safety culture and equips employees to identify, report, and correct unsafe conditions.

1. Site-Specific Safety Orientations

- All employees must complete a **site-specific orientation** before beginning work at a new project location.
 - Orientation includes:
 - Emergency action plans and evacuation routes
 - Site-specific hazards and restricted areas
 - PPE requirements and restroom/sanitation locations
 - Jobsite access and parking instructions
 - Employees must sign the orientation form acknowledging their understanding of the site safety protocols.
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2. Hazard Communication (HAZCOM) and SDS Access

- All employees must be trained in **Hazard Communication (HAZCOM)** in accordance with **OSHA 29 CFR 1910.1200**.
 - Training covers:
 - Understanding GHS labels and SDS documents
 - Location and access to SDS binders in trucks and work areas
 - Chemical storage, usage, and disposal procedures
 - PPE selection and emergency response for chemical exposure
 - Retraining is required when new chemicals are introduced or procedures change.
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3. Bloodborne Pathogens Awareness

- Field personnel who handle **portable sanitation services** or encounter biohazards must complete **Bloodborne Pathogens Awareness Training**.
 - Training includes:
 - Modes of transmission (e.g., human waste, used materials)
 - Use of PPE and hygiene practices to prevent exposure
 - Spill response and cleanup procedures
 - Reporting and medical follow-up protocols
 - Training aligns with **OSHA 29 CFR 1910.1030** and must be renewed annually.
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4. Lockout/Tagout (LOTO) – For Maintenance Personnel

- Maintenance staff who perform work on energized systems must be trained in **Lockout/Tagout (LOTO)** procedures per **OSHA 29 CFR 1910.147**.
 - Training includes:
 - Recognition of energy sources (mechanical, electrical, hydraulic)
 - Application of locks and tags
 - Verification of zero energy state
 - Release and restart procedures
 - Authorized employees must be retrained when there are changes in procedures, equipment, or roles.
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5. Defensive Driving and Roadway Safety (Drivers)

- All drivers must complete **Defensive Driving Training** prior to operating any company vehicle.
 - Training topics include:
 - Safe following distances and speed control
 - Blind spots and proper use of mirrors
 - Backing procedures and use of spotters
 - Use of seat belts and avoidance of distractions (e.g., phone use)
 - Procedures for roll-off delivery, sweeping, and service truck operations in traffic environments
 - Drivers must maintain a valid license and may be subject to periodic driving record checks.
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Employee and Supervisor Responsibilities

- **Employees** must attend all required training sessions and apply learned procedures in the field.
- **Supervisors** are responsible for:
 - Scheduling and tracking training completions
 - Conducting tailgate safety meetings and refresher sessions
 - Ensuring site-specific briefings occur prior to job mobilization
- The **Safety Consultant** maintains all training records and provides updated modules as regulations or procedures evolve.



Regulatory Compliance

Purpose

This section outlines the federal, state, and local regulations that Desert Services complies with in the execution of our field operations. Compliance is essential not only for legal standing, but also for protecting employees, clients, the public, and the environment. This section reinforces Desert Services' commitment to meeting or exceeding applicable regulatory standards in all aspects of our work.

1. OSHA Compliance – 29 CFR 1926 and 1910

- All operations involving construction, maintenance, and sanitation adhere to **OSHA 29 CFR Part 1926 (Construction Standards)** and relevant sections of **29 CFR Part 1910 (General Industry Standards)**.
 - Applicable subparts include but are not limited to:
 - Subpart E: **Personal Protective Equipment**
 - Subpart H: **Hazardous Materials**
 - Subpart I: **Tools and Equipment**
 - Subpart K: **Electrical Safety**
 - Subpart P: **Excavation Safety**
 - Subpart D (1910): **Walking-Working Surfaces**
 - Desert Services conducts jobsite audits and tailgate training to ensure OSHA compliance is upheld at all levels.
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2. DOT/FMCSA Requirements for Vehicle Operation

- All drivers and vehicles operating under Desert Services must comply with **U.S. Department of Transportation (DOT)** and **Federal Motor Carrier Safety Administration (FMCSA)** regulations, including:
 - Valid commercial or operator's driver licenses (as applicable)
 - Pre- and post-trip vehicle inspections
 - Hours of service regulations (if applicable)
 - Daily logs or ELD (electronic logging device) records when required
 - Vehicle maintenance schedules and defect reporting
 - All vehicles must carry appropriate insurance, registration, and DOT-required safety equipment.
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3. Environmental Compliance – SWPPP and Local Codes

- Desert Services maintains compliance with **Stormwater Pollution Prevention Plan (SWPPP)** protocols and applicable **EPA Clean Water Act** requirements.
 - Field crews are trained to:
 - Prevent fuel, wastewater, or chemical runoff
 - Maintain erosion and sediment controls (e.g., wattles, silt fences)
 - Properly contain, label, and dispose of contaminated materials
 - Local city or county environmental regulations for construction runoff, dust suppression, and wastewater disposal are also enforced.
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4. ADA Compliance – Sanitation Services

- Portable restroom units provided on public or job sites must meet **ADA (Americans with Disabilities Act) accessibility guidelines** where required by project specifications or jurisdictional law.
 - ADA-compliant units must:
 - Be clearly marked and accessible via stable, level surfaces
 - Include compliant turning radius, grab bars, and entryway width
 - Desert Services ensures these units are deployed when mandated and maintained in safe, clean condition.
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Employee and Supervisor Responsibilities

- All employees must follow procedures that align with regulatory requirements relevant to their duties.
- Supervisors are responsible for:
 - Verifying that PPE, equipment, and job practices comply with current OSHA and DOT standards
 - Ensuring proper signage, containment, and waste disposal is followed per local ordinances
 - Communicating any changes in regulations to field crews during safety meetings
- The **Desert Services Leadership Team** monitors updates to applicable laws and ensures the company's programs remain current.