EDGERTON

SAFETY
QUALITY
EFFICIENCY

2026

SAFETY PROGRAM

COMMITTED TO ZERO.
FOCUSED ON EACH OTHER.

SAFETY QUALITY EFFICIENCY

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President's Message

Employees, Customers, and Trade Partners:

At Edgerton, safety is not simply a program or a requirement—it is an operational priority that defines who we are as an organization. It is fundamental to how we plan our work, execute our projects, and protect the people who make our success possible.

Our Company's greatest asset is its people. The skill, dedication, and professionalism of our employees are what drive our success across every earthwork, underground utility, and demolition project we undertake. No schedule, production goal, or financial result is ever more important than the health and well-being of the men and women who represent this Company each day.

This Safety Program establishes the expectations and standards that every employee, supervisor, manager, and trade partner is required to follow without exception. Compliance with our safety policies and procedures is not optional, it is a condition of employment, subcontracting, and a responsibility we all share to ensure every individual returns home safely at the end of each day.

Safety excellence requires more than following rules, it requires a proactive mindset. Every project must be approached with deliberate planning, hazard recognition, and thoughtful execution. Identifying risk before work begins, communicating clearly, and adapting when conditions change are essential parts of how we operate safely and successfully.

We empower every individual with **Stop Work Authority**. Every employee, regardless of role or position, has both the authority and the responsibility to stop any task or operation they believe presents an unsafe condition or unacceptable risk. Exercising this authority will always be supported and respected. Speaking up and taking action to protect one another is a sign of leadership and professionalism.

Safety is everyone's responsibility, and our commitment to it must be visible in every decision we make, every plan we develop, and every action we take in the field.

Together, through discipline, accountability, and care for one another, we will continue to build a culture where safety is not just expected, it is how we lead.

Plan Deliberately. Work Safe. Speak Up. Look Out for One Another.

Daniel J. Urbanek, President

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ZERO TODAY!

At Edgerton, "Zero Today" means approaching workplace safety one day at a time, one task at a time, and one decision at a time. Safety excellence is not achieved through slogans alone—it is built every day through planning, accountability, communication, and looking out for one another on every jobsite.

Our goal is simple: zero injuries, zero shortcuts, and zero incidents each day. By focusing on the work in front of us, identifying hazards before they become incidents, and committing to safe work practices every single day, we create a culture where every employee goes home safely at the end of the shift.

"Zero Today" reminds us that lasting safety success is achieved through daily commitment, personal responsibility, and continuous improvement.

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Cultural Principles and Safe Work Planning Rules

Policy / Procedure: **Code of Safety Conduct**	Owner: **Safety**	Revision Date: **New**
		Effective Date: **June 15, 2026**

1.0 Policy

All employees are required to conduct themselves in a manner that prioritizes safety at all times and complies with all applicable Company policies, project requirements, and regulatory standards. Employees must follow established safety procedures, properly use required personal protective equipment, participate in safety training, and promptly report hazards, unsafe conditions, incidents, and near misses. No task shall be performed if it cannot be done safely, and employees are expected to stop work and notify supervision when unsafe conditions exist. Failure to adhere to safety rules or engaging in unsafe behavior may result in disciplinary action, up to and including termination.

2.0 Purpose/Scope

This policy applies to all Company employees and is intended to provide the general cultural principles and expectations of each employee to promote a safe and healthy work environment. These cultural principles are the foundation of promoting the Company's mission of Safety, Quality, and Efficiency (SQE) and achieving a Zero Today! result.

3.0 Responsibilities

- **All Employees** are responsible for complying with this policy and all policies contained in Edgerton's Safety Program.

- **Project Managers** and **Supervisors** are responsible for ensuring that employees working on their projects are adequately trained in the policies in Edgerton's Safety Program and comply with the same.

4.0 General Procedures

- **Owning Safety:** Every company employee is responsible for OWNING SAFETY. The Company provides a Safety Program, training, and other tools to ensure the safety of its employees, but safety starts with the individual. Each employee is responsible for actively participating in their own safety, which starts with the following:
    - Employee Ownership:
        - Being personally responsible for owning your actions—every task, every job, every day. Each action affects the individual making it, but each action also affects colleagues. Make good decisions every day to ensure your safety, as well as the safety of colleagues.
    - Stop Work Authority:
        - Each employee must follow Edgerton's Stop Work Authority policy. This means stopping any job or task to ensure safety at all times. If something doesn't look or feel right, stop the job or task and ensure your safety and the safety of those around you.
        - You will never be disciplined for exercising Stop Work Authority in good faith.
    - Intervention, Coaching, and Mentoring:
        - Take the time to encourage other employees to promote safety. Intervene and coach co-workers to recognize hazards, implement the proper mitigations, or think critically about a task to ensure safety.
        - Safety conversations are promoted. Never hesitate to start a conversation with your coworkers or project partners that will promote worker well-being.

- Continuous Improvement:
  - All employees should strive to be better each day. Never stop providing feedback, suggestions, ideas, etc. to explore safer ways to perform any task.
  - Use every mistake as an opportunity to learn and do it better the next time.
- Accountability:
  - Every employee must hold themselves accountable for their behaviors and actions.
  - Understand safety expectations and hold yourself accountable to comply.

- **General Safety Rules:**
  - All Employees are required to follow the Company's safety policies and procedures, including but not limited to this Safety Program.
  - All employees are responsible for ensuring that they possess the necessary training to perform their job in a safe and proper manner. If you are unsure if you have the necessary training, stop what you are doing and immediately talk to your Supervisor or Safety Representative.
  - All Employees are required to report all unsafe conditions, acts, hazards, and near misses to your Supervisor or Safety Representative.
  - All Employees are required to report all incidents—no matter how minor—to your Supervisor or Safety Representative immediately. In accordance with the Company's Incident Notification policy, failure to report any incident could result in disciplinary action. In addition, the delay in reporting can cause a delay in, or in some cases loss of, Worker's Compensation benefits.
  - Employees shall not handle, tamper with, or modify machinery, tools, or equipment outside the scope of their regular duties.
  - Employees shall not attempt to repair damaged machinery, tools, operating equipment, or electrical equipment at any time. Repairs are to be made only by qualified personnel. Where applicable, follow appropriate lock/out-tag/out procedures.
  - Employees shall not make adjustments or modifications to safety devices or guards installed on equipment at any time.
  - Employees must report any damaged equipment, inoperative safety devices, or equipment problems to your Supervisor immediately so that proper corrective action can be taken.
  - Employees shall not operate power equipment, machinery, or tools unless they possess the required training and are authorized to do so.
  - Employees shall use the proper tools for the job.
  - Use of cell phones while on company time is prohibited unless they are used for work purposes and does not present a threat to the work environment.
  - No loose or frayed clothing, jewelry such as rings, watches, necklaces, bracelets, dangling earrings, untucked shirts, ties, or unsecured shoulder length hair will be permitted around any moving machinery or equipment.
  - Employees are responsible for maintaining a clean environment. Trash, recyclables, scrap, and hazardous chemicals and materials are to be placed in the appropriate containers.
  - In addition to these guidelines, employees working at locations owned by third parties are responsible for learning and following all rules and regulations set forth by that property owner.
  - Employees working in situations where there are specialized requirements such as near energized power lines, confined spaces, on scaffolding, or where fall protection is required must have the appropriate training and follow all applicable regulations and permit requirements.
  - Employees must be aware of and follow all traffic regulations.
  - Employees will notify their supervisor if they are not mentally or physically able to perform their job safely, in compliance with the Company's Fit for Duty policy.

5.0 Training

- All employees will be provided basic safety requirements during their on-boarding, including Stop Work, Fall Protection, Confined Space, and PPE.

6.0 Recordkeeping

- All training records are to be maintained by the Safety Department.

7.0 Related Documents

- Stop Work Authority policy
- Fit for Duty policy
- Personal Protective Equipment policy

Policy / Procedure: **Disciplinary Policy**	Owner: **Safety**	Revision Date: **June 15, 2026**
		Effective Date: **Jan. 1, 2026**

1.0 Policy

All Company employees are expected to perform their work safely and in compliance with Edgerton's Safety Program, policies and procedures, and safe work rules. Any employee determined to be in violation of these are subject to immediate disciplinary action, up to and including termination of employment.

2.0 Purpose/Scope

This policy applies to all Edgerton employees and is intended to provide the process for addressing compliance issues with the Company's Safety Program. If a collective bargaining agreement or other union agreement contains different disciplinary protocols or procedures, then the union agreement may supersede and take precedent in said areas.

3.0 Definitions

- **Personal Protective Equipment** (**PPE**): equipment, accessories, and some specialized clothing designed to create a barrier, shield, or isolate individuals from workplace hazards.
- **Safety Warning Notice**: the preparation of a written Notice outlining violations of the Company Safety Program for internal assessment and education.
- **Supervisor**: a Company employee who directs, manages, or has authority to make changes in work activity.
- **Suspension**: the removal of a Company employee from the job site or Company facility, for a specified period, with or without pay.
- **Termination**: severance of employment with the Company.
- **Written Warning**: the issuance of a written Notice or other written documentation outlining general violation(s) committed by a Company employee.

4.0 Responsibilities

- **Superintendent**, **Project Manager**, and **Supervisor** are responsible for ensuring employees are in full compliance with the Company's Safety Program and any site or job specific safety rules or requirements. They are also responsible for initiating disciplinary action for non-compliance.
- **Safety Representatives** are responsible for auditing employee conduct and compliance with the Company's Safety Program and any site or job specific rules or requirements.
- **All Employees** are responsible for complying with the Company's Safety Program and any job specific safety rules or requirements.
- **General Counsel** and personal handling human resources duties are responsible for ensuring employee discipline is administered in a legally compliant manner.

5.0 General Requirements and Procedures

- Safety is the #1 operational priority at Edgerton and the Company considers employee health and well-being as a top priority. Work will be stopped if the health, safety, or environmental risks are unacceptable. The following procedures are to be followed when considering and evaluating an employee's compliance with the Company's Safety Program and Federal, State, and Local laws, rules, and regulations.

- Each supervisor is responsible for knowing, abiding by, supporting, teaching, informing, and enforcing the applicable safety rules with their subordinate(s) to help ensure work activities are performed safely.

- Work site conditions vary from place to place, and various safety rules and procedures may apply. Potential types of safety violations include but are not limited to:
  - Non-compliance with the Company Safety Program, policies and procedures, or safe work rules.
  - Failure to report unsafe work conditions or equipment.
  - Failure to wear or maintain required PPE.
  - Violation or disregard of safety rules, or common safety practices.
  - Failure to immediately report an Incident.
  - Willful or negligent damage of company property.
  - Violations of any State or Federal Occupational Safety and Health rule or regulation.

- Factors to consider when assessing disciplinary action include, but are not limited to:
  - The employee's attitude regarding the violation; employee's prior safety compliance and discipline; circumstances surrounding the violation; severity of the conduct including probability of Serious Injury or Fatality or Potential Serious Injury or Fatality; past work history; and other factors deemed appropriate by Company management.

- Based upon the above factors, and any other relevant information, an employee may receive discipline in the form of a Written Warning, Safety Warning Notice, Suspension, and/or Termination, or any other discipline that is appropriate. Discipline will be assessed on a case-by-case basis, with consultation with General Counsel, outside counsel, or other personnel as needed.

- Discipline will never be administered in a discriminatory fashion based on an employee's status as a member of a protected class under local, state, or federal law.

- All Disciplinary actions arising from an Incident will be subject to investigation by a Safety Representative pursuant to the Incident Investigation Policy and Procedure.

6.0 Recordkeeping

- All disciplinary action against an employee will be documented in the employee's personnel file.

7.0 Related Documents

- Stop Work Authority
- Code of Safe Conduct
- Incident Notification and Reporting Policy
- Written Warning
- Safety Notice Warning

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WRITTEN WARNING

1. Inform the employee of the violation and explain the reason for the violation.
2. Make sure the employee understands he or she is receiving this Warning.
3. Make sure the employee understands this Warning will be retained in his or her personnel file.
4. Make sure that a Manager, Supervisor, Superintendent, or Safety Representative is present while issuing the employee this Warning.

Employee Name:	**Date of Warning:**
Employee Position / Title:	**Project Name & No:**
Construction Experience (Years):	**Tenure with Edgerton:**

Description of Violation		
Date of Event:	**Time:**	**Location:**
Description:		

Resolution Plan
The Employee must do the following to remedy the violation:

Issued by:

Supervising Employee who issued Warning **Date**

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SAFETY WARNING NOTICE

Employee Name:	**Date of Warning:**
Employee Position / Title:	**Project Name & No:**

Violation(s)		
☐ Non-Compliance with Company Safety Program	☐ Failure to report unsafe work condition	☐ Willful or negligent damage to property
☐ Violation or disregard of safety rule or common safety practice	☐ Failure to timely report Incident	☐ Failure to wear or maintain required PPE
☐ Other:		

Event Statement		
Date of Event:	**Time:**	**Location:**
Description:		

Action Taken / To be Taken			
☐ Warning	☐ Re-Training	☐ Suspension	☐ Termination
☐ Other:			

Issued by:

Safety Representative Name **Date**

Policy / Procedure: **Drug and Alcohol Policy and Testing Program**	Owner: **Safety**	Revision Date: **Feb. 19, 2025**
		Effective Date: **Feb. 19, 2025**

1.0 Policy

Employees are prohibited from performing work for the Company while under the influence of any controlled substance or alcohol, or prescribed medication that could affect fitness for duty. The Company has implemented a Drug and Alcohol Testing Program to achieve a drug and alcohol-free workplace.

2.0 Purpose/Scope

The Company recognizes the significant safety concerns caused by drug and alcohol use in the workplace. The use of controlled substances or alcohol jeopardizes the safety and productivity of Company employees and the safety and well-being of others. Accordingly, the Company adopts this policy and the accompanying Drug and Alcohol Testing Program (the "Program") to ensure employees, especially field employees, are fit for duty and able to perform work in a safe manner.

3.0 Definitions

- Reasonable Cause or Suspicion: Suspicion based on specific personal observations that a trained Company representative can describe concerning the appearance, behavior, speech, or breath odor of an employee.

- Incident: Any event occurring during work hours, on a worksite, or while conducting work-related activities for the Company (at any time, day or night), or that involves any Company vehicle or equipment, and that results in, or has the potential to result in, personal injury or illness, vehicle damage or loss, Property Damage, or Utility Strike. An Incident also includes any Near Miss.

4.0 Responsibilities

- All employees are responsible for understanding this policy and the Drug and Alcohol Testing Program and complying with all requirements. All Employees will be required to execute annually an Acknowledgement document acknowledging their understanding of the policy and continued compliance with its requirements.

5.0 Drug and Alcohol Testing Program

- **Prohibited Drug and Alcohol Use**: The Company's Program goals are to ensure a drug and alcohol-free work environment, and to reduce and help eliminate drug and alcohol related accidents, injuries, fatalities and property damage. The following is prohibited:
    - Using, being under the influence of, or possessing illegal drugs while performing any work-related function or activity, acting in any capacity as a Company employee or agent, or operating or using any Company equipment or vehicles.
    - Using or being under the influence of legal drugs that are being used illegally.
    - Buying, selling, soliciting to buy or sell, transport, or possess illegal drugs while on Company time or property, or while at Company sponsored functions.
    - Using alcohol six (6) hours prior to performing work duties.
    - Using or being under the influence of alcohol at any time while on duty, eight (8) hours post-accident, or until tested.

- Misuse of prescription or over-the-counter medications. Employees must notify their supervisor if taking a medication that might impair their ability to perform required work tasks.
- Possessing any amount or type of alcohol (including medications, or over-the-counter remedies containing alcohol) while on duty.
- Testing positive for unlawful drugs or alcohol.
- Failing to stay in contact with the Company or its Medical Review Officer (MRO) while awaiting test results.
- Violation of any other Program requirement or directive.

Any employee who violates any prohibition above is subject to disciplinary action by the Company, up to and including termination. With appropriate approval, the Company recognizes limited exceptions to the prohibition of alcohol use during work hours at work-approved functions or outings.

- **Testing Availability and Procedure**
  - The Company has retained a properly credited provider to perform all drug testing required under this policy at a designated collection site. That provider will be responsible for gathering, securing, and testing all collected specimens pursuant to its approved methodology.
  - The provider will provide a Medical Review Officer (MRO) who is qualified in and responsible for confirming positive test results.
  - The provider will also be qualified in administering breach alcohol testing, as needed.
  - All specimen testing procedures will be performed in accordance with applicable regulations approved by the Substance Abuse and Mental Health Service Administration (SAMHSA), as they are now in effect or as hereinafter amended.
  - Employees found switching or adulterating any urine, blood, or any other samples will be in violation of this Program and may be subject to the disciplinary actions stated herein.

- **Reasonable Cause or Suspicion Testing**
  - In cases in which an employee is acting in an abnormal manner or a supervisor has Reasonable Cause or Suspicion to believe that the employee is under the influence of a controlled substance or alcohol, the Company shall require the employee to go directly to a collection site to provide an appropriate specimen for laboratory testing. In such a case, the employee will be transported to the collection site by a Company representative.
  - The Company representative will make a written statement of these observations within forty-eight (48) hours of the observed behavior.

- **Post-Accident Testing**
  - An employee shall submit for testing for the use of controlled substances or alcohol as soon as possible, but not later than eight (8) hours after being involved in an Incident.

- **Prescription Medication**
  - An employee will be allowed to list any prescribed medications on a form provided at the collection site. The employee may also be required to identify the prescribing provider and to authorize the testing provider or MRO to communicate with that physician about the medication, side effects, the underlying condition, and ability to safely perform work while taking any prescriptions. The employee will have the opportunity to discuss the use of the medication with the testing provider or MRO.
  - In the event it is determined by the testing provider or MRO that an employee is taking or is under the influence of a prescribed medication that will reasonably impair the employee's ability to safely and adequately perform his or her job, the employee may be placed on a medical leave of absence until the condition requiring the taking of the medication is resolved or the employee is no longer taking the medication.

- **Disciplinary Action Based on Positive Test Results Up to and Including Discharge**
  - An employee who tests positive for the use of a controlled substance or alcohol, as reported to the Company by the MRO, shall be considered unfit for duty and unqualified to work for the Company for the remainder of the employee's shift. Further, a positive test result shall be grounds for the immediate discipline of the employee, up to and including termination.
  - A positive test result is considered proof of the employee's willful and intentional misconduct.

- **Disciplinary Action Based on Refusal to Submit to Testing**. An employee who refuses to submit to or undergo testing under any of the provisions of this Program shall not be permitted to work for the Company. Such refusal shall be treated as a positive test and shall result in immediate discharge.

- **Return to Work Policy Following Positive Test Results**. Any employee who received a positive test result and wishes to return to work must provide the Company with a negative drug and alcohol test upon demand. The employee will not be allowed on Company premises or on any premises that the Company is working on until the requested result is supplied.

- **Subcontractor Drug and Alcohol Testing**. Any subcontractor working directly for the Company shall be required to follow the guidelines set forth in this Program or, alternatively, maintain a similar internal program. The Company reserves the right to audit the subcontractor to ensure program and policy compliance for both Company and customer or client requests.

- **Employee Background Checks**. Criminal background checks may be necessary for Company projects, including per client requests. The Company will supply necessary documents as needed for employees. Employees who do not meet the criteria set forth by the client or duties may not be allowed to work on the project subject to background check.

- **Program Violations**. In the event any portion, condition, or requirement of this Program is found to be in violation or any federal, state or local rule or law, then the employee or subcontractor agrees that the balance of the Program shall remain in effect and enforceable.

- **Additional Compliance Requirements**. From time to time, the Company will be required to comply with customer, client, or other additional drug and alcohol program requirements based upon project requirements. All employees will agree to comply with any reasonable additional drug and alcohol requirements as required for the Company to perform its required operations.

6.0 Recordkeeping

- Testing results will be maintained in employee personnel files, as required.
- Testing results and related information will be maintained, as needed, by Safety.

7.0 Related Documents

- Appendix A: Acknowledgement of Receipt of Drug and Alcohol Testing Program and Agreement to Abide by Program.
- Appendix B: Annual Acknowledgement.

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APPENDIX A

ACKNOWLEDGMENT OF RECEIPT OF DRUG AND ALCOHOL TESTING PROGRAM AND AGREEMENT TO ABIDE BY PROGRAM

I, _____, hereby acknowledge that I have received a copy of the Edgerton Contractor, Inc.'s (Edgerton) Drug and Alcohol Testing Program (the "Program").

I further acknowledge and agree to the following:

1. I have read the Program and fully understand the terms contained therein and the consequences for violating any term of the Program.
2. I understand that my compliance with all terms of the Program is a condition of my employment with Edgerton, and I agree to abide by all terms of the Program. I further understand that if I have a valid Commercial Driver's License (CDL), I am subject to drug testing requirements, including random testing, as stated in 49 CFR Part 382.
3. As applicable, if a post-accident drug or alcohol test is required under this Program and I am seriously injured and unable to provide a specimen at the time of the accident, then this Acknowledgment shall be considered my authorization for Edgerton and the medical review officer to obtain hospital reports and other documents which would indicate whether there were any controlled substances or alcohol in my system.
4. I authorize the collection site, laboratory and medical review officer retained by Edgerton to perform any and all functions which may be required to perform pursuant to this Program or applicable regulations. Such authorization shall include, but is not limited to, the release of test result information to Edgerton, verification of the use of prescribed medications, obtaining information from the employee's physician, hospital, dentist or pharmacist and the reporting of negative test results with a qualifying statement in cases wherein a legally-prescribed Schedule II drug in involved.
5. I hereby release and hold harmless Edgerton, its employees, officers and agents from any liability whatsoever arising from the Program.

_____

Employee Signature: Date

_____

Witnessed By: Date

Rev. 02/23

ACKNOWLEDGEMENT OF REVIEW OF DRUG AND ALCOHOL TESTING PROGRAM AND AGREEMENT TO ABIDE BY PROGRAM

As an employee of Edgerton Contractors, Inc. ("Edgerton"), I affirm that I have read and understand Edgerton's Drug and Alcohol Testing Program (the "Program").

By executing this document, I acknowledge that I am aware of the provisions of the Program, understand that compliance with the Program is a condition of my employment with Edgerton, and hereby agree to abide by all terms of the Program.

Date:_____

Employee Name:_____

Employee Signature:_____

Policy / Procedure: **Firearms**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

Firearms are not permitted in any Company building or project site. Strict compliance is mandatory.

2.0 Purpose/Scope

This Policy applies to all Company employees and is applicable at all Company premises and project sites.

3.0 Responsibilities

- All **Employees** are responsible for understanding this policy and complying with its basic requirements.

4.0 General Procedures

- Firearms are strictly prohibited at the workplace or at any Company premises or project site. If permitted by the property owner or general contractor, firearms may be securely stored in an employee's vehicle.
- Any employee violating this policy is subject to disciplinary action, including but not limited to immediate termination.

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Policy / Procedure: **Fit for Duty**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Company employees performing field operations are required to report to work each day fit for the specific duties they are assigned and expected to perform, pursuant to the requirements of this Policy.

2.0 Purpose/Scope

This Policy applies to all Company employees and is intended to set the minimum guidelines and requirements to ensure employees are physically and mentally capable of performing all tasks in a safe and efficient manner, and in compliance with the Company's safety programs and policies, applicable regulations, and other jobsite safety requirements.

3.0 Responsibilities

- **Supervisors** are responsible for ensuring that each crew member is physically and mentally capable of performing the task(s) assigned and ensuring compliance with this Policy.

- **All Employees** covered by this Policy are responsible for complying with its requirements and reporting to their jobsites fit for duty.

4.0 General Procedures

- All Company employees covered by this Policy must ensure that they are fit for duty for the specific tasks they are responsible for completing each day. Fit for duty means, at a minimum:
    - Ensuring that you are physically capable of performing each task assigned.
    - Ensuring that you have completed appropriate stretch and flex before commencing work, if necessary.
    - Ensuring that you possess the proper training necessary to perform each task assigned, including proper certification, licensure, or competent person status based on specific duties.
    - Ensuring that you are mentally fit to perform your tasks in safe manner, which requires that you are NEVER under the influence of drugs, alcohol, or other substances that could impair your judgment, performance, or ability to complete any assignment.
        - Additionally, being fit for duty means that legally obtained prescription drugs will not impact your ability to perform your duties. Please speak with a Safety Representative if you believe any prescription drug or medication may impact your abilities on the jobsite. Reasonable accommodation will be made if available.
    - Ensuring you show up and remain properly hydrated, and that you have obtained the necessary amount of rest or sleep before each shift.
    - Ensuring that you show up to the jobsite with the minimum Personal Protective Equipment required at all jobsites. Additionally, ensuring that you obtain any additional Personal Protective Equipment necessary to complete your work, *e.g.*, face shields for chop saws or grinding.
    - Ensuring you have access to and are utilizing the correct tool for each task.
    - Ensuring that you understand and are capable of complying with all safety policies and procedures related to duties and responsibilities.
- Violation of this Policy is grounds for discipline, including immediate termination of employment without prior warning.

5.0 Training

- All employees will receive a copy of this Policy and sufficient notice to understand its requirements.

6.0 Related Documents

- Drug and Alcohol policy
- Personal Protective Equipment policy

Policy / Procedure: **Pre Project Planning and Hazard Assessment**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

A hazard assessment shall be conducted for each project prior to the commencement of operations. This Policy provides the guidelines and requirements for completing an appropriate hazard assessment.

2.0 Purpose/Scope

This Policy applies to all construction operations governed by OSHA 1926 and is intended to provide the general guidelines and requirements for conducting a hazard assessment to identify potential hazards in the workplace, preventative measures to mitigate or eliminate hazards, and/or identify the appropriate Personal Protective Equipment required to safely perform operations.

3.0 Definitions

- Hazard Assessment: a process to assess the workplace, tasks, and surrounding environment to determine if hazards are present, or are likely to be present, which necessitates the use of Personal Protective Equipment (PPE) or other safe working practices or preventions.
- Personal Protective Equipment (PPE): equipment, accessories, and some specialized clothing designed to create a barrier, shield, or isolate individuals from workplace hazards.
- Pre Project Checklist & Hazard Assessment: written document used to streamline the Hazard Assessment process.

4.0 Responsibilities

- **Project Managers** are responsible for ensuring a Hazard Assessment is completed for each of their projects.
- **Safety Representatives** are responsible for collaborating with Project Managers to complete Hazard Assessments and corresponding paperwork. **Safety Representatives** are also responsible for auditing jobsites for compliance with any safe work plans prepared as a result of the Hazard Assessment.
- **Supervisors** are responsible for understanding Hazard Assessment findings and communicating resulting plans to all crew employees.
- **Employees** are responsible for following any safety plan developed from a Hazard Assessment.

5.0 General Procedures

- A Hazard Assessment must be conducted before commencement of work on every new project. The primary objectives of a pre-job Hazard Assessment are to:
  - Identify hazardous conditions to which Company employees may be exposed over the duration of the project.
  - Develop new or adopt/modify safe work plans and procedures to eliminate or control hazardous working conditions.

- Where elimination of hazardous working conditions is unreasonable, develop controls using the hierarchy of controls. Focus on engineering, administrative then personal protective equipment of a combination to provide a greater level or safety.
- Identify and provide appropriate protective clothing and equipment as required by the working conditions.
- Identify security, medical, environmental protection and sanitation requirements, emergency evacuation routes, assembly points and safe havens.

- The Hazard Assessment should be completed utilizing the Pre Project Checklist & Hazard Assessment document, see attached. The Hazard Assessment should include an assessment of the project site, including the Company's footprint of operations.

6.0 Training

- All Project Managers should be familiar with the requirements of this Policy and able to complete a Pre Project Checklist & Hazard Assessment.

7.0 Related Documents

- Pre Project Checklist & Hazard Assessment

Policy / Procedure: **Safe Work Planning**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company requires that a Job Hazard Analysis, with all related components, be completed prior to the start of any task, shift, or daily operations. All employees performing field operations are required to strictly follow the requirements of Job Hazard Analysis governing their operations.

2.0 Purpose/Scope

This Policy applies to all Company employees performing field operations. It provides the minimum requirements for the Job Hazard Analysis process, and related Excavation Checklist process, and is intended to ensure that all field operations are safely planned prior to commencement and that all employees identify, understand, and know how to prevent hazards associated with their work.

3.0 Definitions

- Job Hazard Analysis (JHA): a JHA is a safe work planning and hazard assessment tool to be used by project supervisors/foremen to identify any hazardous working conditions in their work area or related to their scopes of work before work is performed, and the action necessary to eliminate or control the specific hazards.

- Excavation Checklist: a section of the Job Hazard Analysis to be completed by project supervisors/foremen prior to any excavation operations to identify excavation related hazards and ensure the excavation is safe for entry and/or daily operations.

4.0 Responsibilities

- **Supervisors** are responsible for complying with the requirements of this Policy including, but not limited to, ensuring they complete a daily JHA prior to the start of operations.

- **All Employees** performing any field operations are responsible for participating in pre-work daily meetings conducted by their **Supervisors** to complete and review the JHA. **All Employees** are also responsible for strictly complying with the applicable JHA governing their scopes of work.

5.0 General Procedures

- **Job Hazard Analysis Requirements**:
    - Prior to the start of work each task and shift/day, and in preparation of the work to be performed, a JHA will be developed at the location where the work will be performed. Crew members will participate in the JHA process so that they understand the hazards associated with the work they are about to perform and know the mitigations necessary to protect themselves from injury or illness.
    - A new JHA must be written, or previous JHA revised and reviewed, for the start of each new task, if conditions or hazards change during the course of work, or in the event of an emergency that forces the cancellation of work permits or previous JHAs.
    - The JHA and accompanying process must include the following components:
        - The Supervisor and crew members should survey the location where the work is to be performed to identify potential hazards.

        - The Supervisor should complete the JHA, along with accompanying daily plan and task sections. The JHA should identify, at a minimum, the tasks to be performed, applicable hazards associated with the work, and any mitigations to be followed.
        - The Supervisor will review the JHA with all crew members to ensure all crew members. Crew members will acknowledge understanding the hazards associated with the job and the necessary precautions by either electronically signing the JHA or being listed as a participant in the JHA process.
    - During work, if any employee identifies a hazard that was not addressed by the JHA, the employee shall immediately notify the Supervisor in charge. The Supervisor should stop work as necessary, asses the hazard, add the hazard and any precautions to the JHA, and review the new information with all crew members.
    - All Employees should utilize their **STOP WORK** obligation as necessary.

- **Excavation Checklist**:
    - Prior to the start of any excavation operations each shift/day, the Supervisor (or other proper Competent Person who completes the JHA) shall complete an Excavation Checklist (included as part of the JHA) to document his or her required excavation inspection and ensure that the excavation is safe for entrance and/or operations.
    - The Excavation Checklist shall be completed in compliance with the Company's Excavation Safety Program. See attached Excavation Checklist template.

6.0 Training

- As part of Supervisor Training for new supervisors, all Supervisors will be trained in the requirements of this Policy and steps required to competently prepare a Job Hazard Analysis and related documents and conduct the JHA process.
- All Employees will be made aware of the requirements of this Policy.

7.0 Recordkeeping

- Job Hazard Analysis, with Excavation Checklists, will be saved in their respective project folders in the Company's document management system.

8.0 Related Documents

- Stop Work Authority

Policy / Procedure: **Stop Work Authority**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

In addition to all Edgerton employee's responsibility to adhere to all safety rules defined by the Company and federal, state, or local regulations, it is the expectation that all employees are obligated to Stop Work anytime they witness at-risk behavior or conditions that could place themselves, co-workers, or others in harm's way, or have a negative impact on the environment.

2.0 Purpose/Scope

This policy applies to all Edgerton employees. It is intended to reduce hazards and risks in the workplace by empowering and engaging all employees in Edgerton's safety management process without fear of retribution or retaliation.

3.0 Definitions

- Stop Work Obligation: The right and authority given to all employees by the Company to stop an activity or action being conducted that may be or is unsafe or that puts others or the environment at risk, without the rear of retaliation or reprisal.

- Life Saving Rule: A rule that is a significant component of a policy that if not followed could lead to serious injury or death (e.g., Fall Protection, Lock Out/Tag Out, PPE).

4.0 Responsibilities

- **All Employees** understand they must exercise their Stop Work Obligation when confronted with an unsafe or potentially unsafe situation, or any violation of a Life Saving Rule.

- **All Employees** must immediately notify their direct supervisor of any situation in which they exercise their Stop Work Obligation.

- **Supervisors** and **Project Managers** understand that they are responsible for the following:

    - Educating and reinforcing Stop Work Obligation with their crew(s).
    - Immediately acting on all Stop Work notifications to prevent harm or risk of harm at their work sites, including cooperating with or participating in the investigation and resolution of any task subject to a work stoppage.
    - Notifying a Safety representative as soon as possible of any Stop Work notification.
    - Refraining from retaliating against or disciplining employees for their good faith exercise of their Stop Work Obligation.

5.0 General Procedures

- Stop Work interventions will be reported immediately to direct supervisors of the work site where the intervention occurred.

- Supervisors are to ensure that any affected employees are not at risk of harm for the activity or task that was stopped.

- No work will resume on the stop work task until all safety concerns have been resolved, and authorization to return-to-work is received from a Supervisor, Project Manager, Superintendent, or representative of Safety. Affected workers may be reassigned to other tasks if there are no concerns regarding safety.

- A representative from Safety will investigate all Stop Work notifications pursuant to the Company's Incident Investigation Policy and Procedure.

- Employees will not be reprimanded or disciplined for exercising their Stop Work Obligation in good faith.

- Abuse of the Stop Work Obligation to accomplish personal goals or for reasons other than risk reduction and incident prevention is unacceptable. Any employee determined to have abused this authority will be subject to discipline, up to termination.

6.0 Training

- All Employees will receive familiarization training in Stop Work protocol during new hire orientation. Refresher training will be provided to emphasize this important policy.

7.0 Recordkeeping

- Instances where an employee of the Company exercises his or her Stop Work Obligation may be documented for use in developing lessons learned, corrective actions, and/or other appropriate documentation to further the Company's goals of risk reduction and incident prevention.
- Confidential materials, if any, will be retained by General Counsel.
- The Company will periodically reaffirm this Stop Work Obligation to all employees.

8.0 Related Documents

- Incident Investigation policy

Policy / Procedure: **Subcontractor Management**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company will take reasonable steps to ensure that Subcontracts are sufficiently capable of performing scopes of work for which they are retained in a safe manner.

2.0 Purpose/Scope

This policy applies to all Company projects or customers that require a subcontractor management program or similar project.

3.0 Definitions

- Subcontractor: In this Policy, it is understood that "Subcontractors" to the Company are "independent contractors". In performing work on a contract for Edgerton, the Subcontractor will at all times perform as an independent contractor and shall be free to perform the work by such methods, and in such manner, as the Subcontractor may choose. The Subcontractor will furnish all labor, tools, equipment, and materials, and do everything else necessary to perform the work properly and safely. The Subcontractor will provide supervision over, and responsibility for, the safety and actions of its employees, and control over and responsibility for its tools, equipment, and materials. The Subcontractor is not, and shall not act, as an agent or employee of Edgerton.

4.0 Responsibilities

- **Project Managers** and **Safety Representatives** are responsible for ensuring compliance with this Policy, including that Subcontractors are familiar with all Company and project site safety rules before commencing operations and that Subcontractors complete any necessary project safety orientations or other requirements.

- The **Preconstruction Team**, including Area Manager, Project Manager, and safety representative, or other personnel as necessary or to whom this responsibility is delegated, is responsible for conducting any prequalification activities as necessary under this Policy.

5.0 General Procedures

- **Subcontractor Prequalification**:
  - Edgerton should only utilize Subcontractors that are sufficiently qualified and knowledgeable to satisfactorily and safely perform operations required of the project.
  - A prequalification may be conducted as necessary for Subcontractors, including new Subcontractors or vendors, to ensure the Subcontractor meets minimum project requirements or specifications of the project owner or prime / general contractor or to ensure minimum qualification to safely perform all work.
  - Any prequalification may include a review of the Subcontractor's safety programs and safety statistics, including but not limited to TRIR, EMR, and / or DART.
  - The Company reserves the right to determine that a Subcontractor or other vendor meets minimum safety requirements based on available information, including work history with Edgerton.

- **Subcontractor Safety and Training Requirements**:
  - Subcontractors performing work on a contract for Edgerton are required to possess the requisite training, licensure, permitting, and experience to safely and efficiently perform all scopes of work in a quality manner.

- **Incident Reporting**:
  - All Subcontractors will be required to report any incident that occurs during operations performed under contract with Edgerton are immediately reported to Edgerton. The Subcontractor will also be required to submit a copy of any incident reports it prepares for internal Company review.

- **Subcontractor Orientation**: Prior to starting operations under contract with the Company, the following should occur:
  - Subcontractors should be provided with a copy of or means of access to any project specific safety or site requirements that affect their operations.
  - Subcontractors should be provided with a copy of or means of access to Edgerton's Safety Program.
  - Subcontractors should receive a copy of Edgerton's Subcontractor Orientation document, which lists mandatory safety rules. (See Subcontractor Safety Orientation).
  - For certain scopes of work, including for example blasting, demolition, etc., the Subcontractor may be required to submit a formal work and / or safety plan prior to mobilization.

6.0 Recordkeeping

- Subcontractor prequalification materials will be retained by the Preconstruction Team.
- Subcontractor project-specific safety information will be retained in the Project File.

7.0 Related Documents

- Subcontractor Safety Orientation

EDGERTON

Safe Work Policies and Programs

Policy / Procedure: **Asbestos**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company has provided the following procedures to ensure employees performing work at a location where asbestos may be present, understand the hazards and precautions associated with asbestos and remain safe from the risk of injury.

2.0 Responsibilities

- **Safety**, **Project Managers**, and **Supervisors** shall collaborate to identify any asbestos-related hazards during the preconstruction planning process. That team will ensure retention of a qualified subcontractor to perform those operations.

- **All Employees** should be familiar with the general procedures of this policy.

3.0 General Procedures

- Edgerton does not self-perform any asbestos removal or abatement operations, or operations that require asbestos removal or abatement. Any operations included within the company's approved scopes of work that require asbestos removal or abatement must be completed by a qualified subcontractor experienced and/or licensed in asbestos removal or abatement.
- Prior to any asbestos abatement or removal operations completed by a Company subcontractor, the subcontractor must provide to a Company Safety Representative a plan that outlines the procedures and precautions to ensure safe removal / abatement operations.
- Only authorized and qualified subcontractor personnel perform asbestos abatement or removal.
- All Company employees performing operations at a location where a subcontractor is performing asbestos abatement or removal must be informed of the procedures and precautions established for safe operations, including the location of any asbestos and removal / abatement operations.
- All Employees should immediately notify their Supervisor or a Safety Representative if they encounter any material that may possibly contain asbestos, and exercise Stop Work Authority.

4.0 Recordkeeping

- All asbestos abatement or removal plans, and other documentation concerning the abatement services, received by subcontractors will be retained in the relevant project file.

5.0 Related Documents

- Stop Work Obligation.

Policy / Procedure: **Compressed Gas**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Employees using, handling, or transporting compressed gas cylinders shall follow the following guidelines to ensure their safety and the safety of others, and prevent compress gas related incidents or injuries.

2.0 Purpose/Scope

This Policy applies to all Company locations that store compressed gas cylinders and to all Company employees who use, handle, or transport compressed gas cylinders as part of their scopes of work.

3.0 Responsibilities

- **Project Managers** and **Supervisors** are responsible for implementing and enforcing this policy.
- **Safety Representatives** are responsible for monitoring compliance with this policy.
- **All Employees** who work with, handle, or transport Compressed Gas Cylinders are responsible for understanding and following this policy.

4.0 General Procedures

- **General Handling and Use Requirements**:
  - Only experienced and properly trained personnel, using the proper Personal Protective Equipment, shall use compressed gases.
  - All cylinder connections, hoses, valves, etc., shall be inspected prior to use. All connections shall be tight with no leaks. Oxygen and fuel gas regulators will be in proper working order while in use. Damaged or deteriorated cylinders, valves, couplings, hoses, etc., shall not be used.
  - Compressed gases contained in a cylinder are under extremely high pressure; therefore, a pressure reducing valve shall be used whenever gas is to be withdrawn from a cylinder. Under no circumstances is gas to be removed from a cylinder without the use of a pressure reducing device.
  - Cylinders shall not be lubricated with grease or oil or handled with greasy or oily hands, nor should cylinders or component parts encounter oil and/or grease.
  - Cylinder valves will be closed when work is finished or when cylinders are moved. Personnel using cylinders should inspect the cylinder after his or her shift to ensure the cylinder valve is closed.
  - If the contents of a compressed gas cylinder are depleted, the cylinder valve must be fully closed, and the valve protection cap reinstalled. The tank should then be marked as "EMPTY."
  - Compressed gas cylinders shall always be secured in an upright position.
  - Cylinders will be placed where they cannot become part of an electrical circuit.
- **Compressed Gas Cylinder Storage**:
  - Cylinders shall be stored in the upright position.
  - Any area where cylinders are stored shall be well ventilated. NO SMOKING or FLAMMABLE GAS (or similar) signate shall be in the area where cylinders are stored.
  - Cylinders shall be labeled with the proper identification of their contents.

- Cylinders in storage shall require valve protection caps at all times, except when the cylinder contents are being dispensed.
- Oxidizing and flammable gas cylinders shall be separated by a minimum of 20 ft. or by a non-combustible barrier.
- Portable fire extinguishers (CO2 or dry chemical) shall be available at any location that stores compressed gas cylinders.

- **Transporting Compressed Gas Cylinders**:
  - Cylinders shall only be transported in vehicles that are preapproved for that use.
  - Compressed gas cylinders shall never be rolled, slid, or dragged from one location to another.
  - Cylinders shall be moved in an upright position, including by use of hand truck, approved cart, or dolly.
  - All pressure regulators should be removed, and valve protection caps installed, prior to moving any cylinder.

5.0 Training

- All Employees utilizing, handling, or transporting compressed gas shall understand and be trained on this policy.

6.0 Related Documents

- Fire Protection policy

Policy / Procedure: **Confined Space Entry**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company has implemented the following procedures for evaluation and verification of confined space entry whenever a scope of work involves working in a confined space. The Company will perform confined space work in a safe and legally compliant manner.

2.0 Purpose/Scope

This Policy applies to all Company employees conducting activities where confined space entry requirements are applicable. The policy establishes guidelines and procedures for Company employees to comply with applicable federal, state, and local regulations, including but not limited to OSHA 1926 Subpart AA.

3.0 Definitions

- Acceptable entry conditions: Conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit-required confined space entry can safely enter and work within the space.
- Attendant: An individual stationed outside one or more permit spaces who monitors the authorized entrant(s) and who performs all attendant duties assigned in this Policy.
- Authorized entrant: An employee who is authorized by the entry supervisor to enter a permit space.
- Blanking or binding: The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that can withstand the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.
- Competent person: Personnel who can identify existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt, corrective measures to eliminate them.
- Confined Space: A space that:
  - Is large enough and configured so that an employee can physically enter and perform assigned work;
  - Has limited or restricted means of entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults and pits are spaces that may have limited means of entry); and
  - Is not designed for human occupancy.
- Controlling Contractor: The employer that has overall responsibility for construction at the worksite. A controlling contractor that owns or manages the property is both a controlling employer and a host employer.
- Engulfment: The surrounding and effective capture of a person by a liquid or finely divided solid substance that can be drawn into a permit space and can cause death by filling or plugging the respiratory system, or that can exert enough force on the body to cause death or serious bodily injury.

- Entry Employer: Any employer that decides whether its employees will enter a permit space. An employer cannot avoid the duties of this standard merely by refusing to decide whether its employees will enter a permit space.

- Entry permit: The written or printed document to allow and control entry into a permit space. The entry permit will contain certain information specified in this Policy.

- Entry Supervisor: The "qualified" person responsible for determining whether entry conditions are acceptable at a permit space where entry is planned, authorizing entry and overseeing entry operations, and terminating entry as required. The entry supervisor can also serve as an entrant or attendant if that person is trained and equipped as required by this standard for each role he or she fills. The duties of the entry supervisor may be passed from one individual to another during an entry operation.

- Hazardous atmosphere: An atmosphere that may expose employees to the risk of death, incapacitation, impairment of abilities to self-rescue (escape unaided from a permit space), injury, or acute illness from one or more of the following:
    - Flammable gas, vapor or mist in excess of 10 percent of the lower flammable level (LFL);
    - Airborne combustible dust at a concentration that meets or exceeds its LFL (can be approximated where the dust obscures vision at a distance of 5 feet or less);
    - Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
    - Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in 29 CFR 1926 Subpart D, Occupational Health and Environmental Control or in Subpart Z, Toxic and Hazardous Substances; or
    - Any other atmospheric condition that is "immediately dangerous to life or health" (IDLH).

- Hot work: An operation capable of providing a source of ignition (for example, riveting, welding, cutting, burning and heating).

- Immediately Dangerous to Life or Health (IDLH): Any condition that would interfere with an individual's ability to escape unaided from a permit space and that poses a threat to life or that would cause irreversible adverse health effects.

- Inerting: The process of displacing the atmosphere in a permit space by a noncombustible gas (such as nitrogen) to such an extent that the resulting atmosphere is noncombustible. This procedure produces an IDLH oxygen-deficient atmosphere.

- Isolate or Isolation: The process by which employees in a confined space are completely protected against the release of energy and material into the space, and contact with a physical hazard, by such means as: blanking or blinding; misaligning or removing sections of lines, pipes, or ducts; a double block and bleed system; lockout or tagout of all sources of energy; blocking or disconnecting all mechanical linkages; or placement of barriers to eliminate the potential for employee contact with a physical hazard.

- Limited or restricted means for entry or exit: A condition that has the potential to impede an employee's movement into or out of a confined space. Such conditions include, but are not limited to, trip hazards, poor illumination, slippery floors, inclining surfaces and ladders.

- Line breaking: The intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive, or toxic material, or an inert gas or any fluid at a volume, pressure, or temperature capable of causing injury.

- Lockout: The placement of a lockout device on an energy isolating device, in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

- Lower flammable limit (LFL) or lower explosive limit: The minimum concentration of a substance in the air that is needed for an ignition source to cause a flame or explosion.

- Non-Permit-Required Confined Space: A space that does not contain or have the potential to contain any hazard capable of causing death or serious physical harm.

- Oxygen-Deficient Atmosphere: An atmosphere containing less than 19.5 percent oxygen by volume.

- Oxygen-Enriched Atmosphere: An atmosphere containing more than 23.5 percent oxygen by volume.

- Permit-Required Confined Space: A confined space that has one or more of the following characteristics:
  - Contains or has the potential to contain a hazardous atmosphere
  - Contains a material that has the potential for engulfing and entrant
  - Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section; or
  - Contains any other recognized serious safety or health hazard.

- Prohibited Condition: Any condition in a permit space that is not allowed by the permit during the period when entry is authorized. A hazardous atmosphere is a prohibited condition unless it can be demonstrated that personal protective equipment (PPE) will provide effective protection for each employee in the permit space and the employer has provided the appropriate PPE to each employee.

- Qualified person: An individual who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his or her ability to solve or resolve problems relating to the subject matter, the work, or the project.

- Retrieval System: Equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of people from a confined space.

- Tagout: Means the placing of a tagout device on a circuit or equipment that has been de-energized, in accordance with the Lockout Tagout Policy.

- Ventilate or Ventilation: Controlling a hazardous atmosphere using continuous forced-air mechanical systems that meet the requirements of the Safety and Health Regulations for Construction (29 CFR 1926.57).

4.0 Responsibilities

- The **Safety Committee** is responsible for the development and review of this Policy.

- **Project Managers** and **Supervisors** are responsible for ensuring their operations comply with the requirements of this Policy, including that all crew members performing confined space operations are adequately trained and understand the requirements of this Policy.

- **All Employees** performing confined space operations are responsible for ensuring they have the appropriate training to perform the duties specific to their role and to understand and comply with the requirements of this Policy.

5.0 General Guidelines

- **Identification of Confined Spaces**
  - All confined spaces within the Company's footprint of operations are to be identified and verified during the project planning phase or during completion of a Pre-Project Checklist and Hazard Assessment.
    - The Project Manager or Supervisor overseeing a project will communicate with the Host Employer and/or Controlling Contractor to identify any Permit-Required confined spaces within the Company's scope of work for that project.
    - Permit-required Confined Spaces controlled by the Host Employer and Controlling Contractor, which are within the Company's scope of work, should be identified prior to commencing operations on the project to ensure safe operations by Company employees working adjacent to the space or entering the space.
  - During construction operations, the Supervisor shall continuously assess the project to identify any new permit required confined spaces that may be created during construction.
  - Based on the classification of confined spaces, e.g., permit or non-permit required, the below safe work practices shall be followed.

- **Labeling**: Every Permit-Required Confined Space controlled by the Company will be labeled or equipped with signage that containing the warning "Danger – Permit-Required Confined Space, Do Not Enter" or similar language to identify the space.

6.0 Non-Permit-Required Confined Spaces & Ongoing Assessment

- This program does not regulate entry into confined spaces that do not require a permit.
- The Supervisor must perform an ongoing assessment of all work performed in a non-permit required confined space to ensure that the space does not transition to a permit required confined space if new hazards arise. This assessment should include:
  - Regularly evaluating the conditions inside the space.
  - Monitoring for changes in air quality or structural integrity.
  - Updating documentation and planning whenever tasks or environmental conditions change.

7.0 Alternative Procedures for Confined Space Entry (Permit-Required)

- Alternative Procedures for Confined Space Entry can be used under OSHA for entry into permit-required confined space, in lieu of the full permit required procedures, if the following conditions are met:
  - All physical hazards in the space are 100% eliminated or isolated through engineering controls so that the only hazard posed by the permit space is an actual or potential hazardous atmosphere.
    - Physical hazards could include, but not necessarily limited to, standing or flowing water; stored energy that could be released such as steam, high pressure water, gas, and electricity; moving or potential moving equipment or parts; entanglement hazards; and sloping configurations that would make exit difficult.
  - Continuous forced air ventilation alone is sufficient to maintain that the permit space is safe for entry and eliminate or control the atmospheric hazards, and, in the event the ventilation system stops working, entrants can exit the space safely.
    - Continuous ventilation will be required 100% of the time under these Alternate Procedures and will begin prior to entry. The air supplied to this space will be from

a safe source and should be directed to the area where employees will be working and remain in place until after they have exited.

- Air monitoring will be conducted prior to and 100% of the time employees are in the space. The initial monitoring will be done before entering by testing for oxygen content, flammable gases, flammable vapors, and potential toxic air contaminants (in that order).
  - This monitoring must be done with a calibrated direct reading instrument that must be bump tested prior to each use. The results of this monitoring will be documented on **Appendix A**. If the results fall within, and are maintained within the safe range identified in **Appendix A**, then these alternate procedures can be used. If a hazard is detected during entry, the Supervisor will;
    - Ensure that each employee leaves the space immediately;
    - Evaluate the space to determine how the hazard developed; and
    - Implement measures to protect employees from the hazard before any subsequent entry takes place;
- Any condition that makes it unsafe to remove an entrant cover are eliminated prior to removing the cover.
- Any fall hazard that is created by removing a cover to a confined space is eliminated or mitigated by a railing or barrier capable of supporting 200 lbs of force.
- If an initial entry of the permit space is necessary to obtain the monitoring data required above, then the entry must be performed in compliance with the permit-required confined space procedures outlined in the next section.
- All information obtained to determine that these alternate procedures can be used, including pre-entry air monitoring test results, must be made available to each employee who enters the permit space.
- No new hazards are created while employees are inside the space, including hazardous atmospheric conditions (e.g., carbon monoxide producing equipment).
- All employees performing the confined space operations can safely enter and exit the space.
- Complete a written certification on Appendix B verifying that the space is safe for entry and complies with the above-requirements for use of Alternative Procedures.
  - The certification must include the date, location of space, and signature / name of person providing certification.

8.0 Permit-Required Confined Space Entry:

- **Preparation of the Space**: An entry supervisor will assess the space to identify potential hazards prior to entry and ensure the space is prepared for entry. The following should be considered when preparing the space for entry:
  - Connecting lines, ducts and pipes connected to chemical, gas and utility sources are broken and capped or blanked;
  - All mechanical, hydraulic and electrical hazards (e.g. agitators, machine drives, electrical lines, etc.) are controlled as required by lockout/tagout standards;
  - The space will be rinsed and/or dried if there is a buildup of hazardous or slippery material on the walls of the space;
  - If excessive heat, the space will be cooled down to a temperature as to mitigate or eliminate the risk of heat illness;
  - Safe access to the space will be provided;
  - Any open entrances will be appropriately blocked to prevent accidental entry;
  - Adequate lighting will be provided either through low voltage lighting or through 110 Volt plugged into a Ground Fault Circuit Interrupter (GFCI);
  - The space will be metered, in the order listed, to determine concentration levels of oxygen, flammable substances, combustible dust, toxic and other atmospheric conditions that are immediately dangerous to life or health.
  - For vertical entries, the retrieval system will be set up at the entry point.

- **Permit Completion**
  - The entry supervisor will complete the Confined Space Entry Form to act as the required Permit (See **Appendix B**) prior to entry by any employee.
    - The permit should be completed in its entirety, including Rescue and Emergency Response Protocols planned during confined space work.
  - The time of permit issuance will always be written in. Permits are valid for up to eight hours. If the job runs past eight hours, a new permit will be issued.
  - A new permit will also be issued if conditions change within the space.
  - The permit will be made available for inspection by any employee entering the space.

- **Personnel Preparation**
  - The entry employer will ensure that workers performing tasks outside the space do not introduce hazards into a confined space. This includes coordinating with contractors and any other employers that may work around the permit space.
  - The entry supervisor will assign entrant(s) and attendant(s) for confined space work. Entrants and attendants must review their respective duties and responsibilities. All personnel involved with the entry can observe all aspects of the preparation.
  - The entry supervisor will ensure proper PPE is selected and available for all entrants. The rescue service team and a stand-by team will also have access to an adequate supply of the required PPE.
  - All attendants and entrants will know the proper methods of communication for operations in the space.
  - The entry supervisor will brief the entrant(s) and attendant(s) on all aspects of the job.
  - At any time, the entry supervisor, the entrant or the attendant can cancel the permit and cause the entry to be either postponed or stopped due to a safety concern.

- **Entry**: the following requirements shall apply when making entry into a Permit-Required Confined Space under this section:
  - All required equipment for entry, including communication equipment, lighting, access equipment, safety, and rescue equipment, as well as the tools needed to accomplish the job, will be available at the entrance.
  - Continuous space atmosphere and non-isolated engulfment monitoring will be established either by the attendant or by the entrant.
  - The attendant will stay in the immediate area of the entrance to the space, and he or she will stay in contact with the entrant until the entrant exits the confined space.
  - The entry supervisor will formally approve the entry to begin. At any time during the job, the entry supervisor, entrant or the attendant can cancel the permit and cause the entry to be either postponed or stopped due to safety concerns.
  - The attendant will document meter readings at intervals decided by the entry supervisor. Readings should be taken as frequent as needed to ensure the safety of entrants. When testing for atmospheric hazards, test first for oxygen, then for combustible gases and vapors, and then for toxic gases and vapors.
  - The attendant will immediately inform the entrant of any exterior condition that could affect the entrant's safety (e.g. fire alarm, severe weather, etc.).
  - An entry permit may be suspended or cancelled and the space reassessed before allowing reentry when a condition that is not allowed under the entry permit arises in or near the permit space. The condition in question must be temporary and must not change the configuration of the space or create any new hazards in it.

- **Entry Completion**: the following requirements shall apply when completing entry operations within a Permit-Required Confined Space under this section:
  - The entry permit must be closed out by listing the time of exit and any other pertinent information. - Barriers to entry must be replaced.
  - All broken, capped or blanked lines, ducts and pipes connected to chemical, gas and utility sources will be re-attached or reconnected.

- Lockouts/tagouts will be released.
- Disconnected hydraulic, mechanical and electrical equipment will be reattached.
- Operating personnel for the space will be notified that it can be returned to production (if applicable).
- All safety and entry equipment will be cleaned and returned to storage locations.

9.0 Duties of Personnel

- **Entry Supervisor:** The entry supervisor will:
  - Know and understand the hazards that may be faced during entry, including information on the signs or symptoms and consequences of the exposure.
  - Verify that:
    - Appropriate notations have been made on the permit;
    - All tests specified by the permit have been conducted; and
    - All procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin.
  - Terminate the entry and cancel the permit when reasons for entering the space have been completed or when an unacceptable condition within the space or outside the space is detected.
  - Verify that rescue services are available and that the means of calling the rescue service are operational. The entry supervisor will ensure that the attendant knows the method for summoning help if rescue is required.
  - Remove unauthorized individuals who enter or attempt to enter the permit space during entry operations.
  - Ensure that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained whenever responsibility for a permit-space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space.

- **Entrant:** All entrants must:
  - Know how to identify the hazards they may be exposed to during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
  - Know how to use any equipment that is provided to them for their protection or their work.
  - Be familiar with the means and methods of communication so that the attendant can properly monitor their work and so the attendant can deliver evacuation warnings.
  - Alert the attendant whenever they recognize warning signs or symptoms of exposure to a dangerous situation or whenever they detect a condition that would warrant immediate evacuation.
  - Exit from the permit space as quickly as possible whenever:
    - An order to evacuate is given by the attendant or the entry supervisor;
    - The entrant recognizes any warning sign or symptom of exposure to a dangerous situation;
    - The entrant detects a prohibited condition; or
    - An evacuation alarm is activated.

- **Attendant:** All attendants will:
  - Know the hazards that may be faced during entry or while in the space, including information on the mode, signs or symptoms, and consequences of the exposure to suspected hazards.
  - Be aware of possible behavioral effects of hazard exposure in authorized entrants.
  - Continuously maintain an accurate count of authorized entrants in the permit space and ensure that the means used to identify authorized entrants is precise at all times.

- Remain outside the permit space during entry operations until all entrants exit and the operation is closed or they are relieved by other authorized attendants. Note: When the employer's permit entry program allows attendant entry for rescue, attendants may enter a permit space to attempt a rescue if they have been trained and equipped for rescue operations.
- Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space when conditions warrant an immediate evacuation.
- Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space.
- Order authorized entrants to evacuate the permit space immediately if:
  - The attendant detects a hazardous condition;
  - The attendant detects a change in the behavior of any authorized entrant which would suggest an exposure to a hazard;
  - The attendant detects a situation outside the space that could endanger the authorized entrants; or
  - The attendant cannot effectively and safely perform all the duties required as outlined in this policy;
  - Summon rescue and other emergency services if the attendant determines that authorized entrants may need assistance to escape from permit-required space hazards. Employers who rely on local emergency services will arrange for responders to give the employer advance notice if they will be unable to respond in a reasonable period of time.
- Do the following when unauthorized persons approach or enter a permit space while entry is underway:
  - Warn unauthorized persons that they must stay away from the permit space;
  - Advise the unauthorized persons that they must exit immediately if they have entered the permit space; or
  - Inform the authorized entrants and the entry supervisor.
- Perform non-entry rescue (rescue attempts that do not cause the attendant to break the plane of the entry to the space) when it is determined a rescue of entrants is required.
- Perform no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.

10.0 Rescue Service

- A rescue team will be on-site for any entry into a Permit Required Confined space that is immediately dangerous to life and health (IDLH).
- Rescue team and rescue arrangements will be determined on a project-by-project basis, including whether rescue will be performed by the Company, a Host Employer or Controlling Contractor, or third-party rescue team.
- Rescue operations will be defined prior commencing operations in any Permit-Required Confined Space.
- If rescue is to be provided by a third-party, the Entry Supervisor will meet with a representative of the rescue service to review:
  - All Permit items, including procedures for entry;
  - Hazards identified in the space; and
  - Necessary equipment (if applicable)
- Any employee designated rescue team must have sufficient training in entrant duties, rescue operations, and all necessary rescue PPE and equipment.
  - The equipment needed to perform rescue operations, including non-entry rescue, will be defined prior to the confined entry work. Equipment may include retrieval systems (tripods).

11.0 Reclassification of Permit-Required Spaces

- Permit-Required Confined Spaces can be reclassified as non-permit-required spaces as described below:
  - If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated without entry into the space, then the permit space may be reclassified as a non-permit-required space for as long as the non-atmospheric hazards are eliminated.
  - The Supervisor (or other Competent Person), using properly calibrated direct-reading instrumentation, will test for oxygen content, flammable gases and vapors, and potential toxic air contaminants. Readings will be taken in the order listed in this paragraph. Acceptable readings include:
    - Oxygen content: between 19.5 and 23.5 percent;
    - Flammable gases/vapors: below 10 percent of the lower flammable limit; and
    - Toxic air contaminants: levels below any air conditions defined as a "hazardous atmosphere" by this policy.
  - Testing will be done from the exterior of the entrance to the space. At no time will any portion of an employee's body break the plane of the entrance to the space to conduct atmospheric testing. If entry into the space is required to conduct testing or eliminate hazards, entry will be done in accordance with permit-space entry procedures outlined in this policy.
  - If, after testing is complete, it is determined there are no atmospheric hazards or any other hazards that could potentially cause injury or harm, the space can be reclassified as a non-permit-required space and eliminated from the permit-space entry procedures. The atmosphere will be monitored continuously during the entry. This reclassification may remain in force as long as atmospheric hazards are not present. This will allow us to revert back to the Alternate Procedures outlined previously in this manual.

12.0 Subcontractors

- Any subcontractor who is engaged in a permit-required confined space entry by the Company must, at a minimum, possess a written plan for the entry, which will be submitted to the Company before performing confined space operations.

13.0 Training

- Training will be provided for all attendants, entrants or entry supervisors at the following times:
  - Before the employee is assigned duties relating to permit-required confined space entry;
  - Before the employee's assigned duties change (i.e. was trained as an attendant and will now be an entrant);
  - Whenever there is a change in operations that presents a hazard that the employee has not been trained on previously; or
  - Whenever there is an indication that the procedure is not being followed safely and/or when there are indications that employee practices or knowledge do not meet the requirements.
- All training will be documented with the employee's name, date of training, and identification of training provided.
- Training will include a combination of classroom training and hands-on proficiency training to demonstrate that the assigned duties as an attendant, authorized entrant, and/or entry supervisor are fully understood.
- Familiarization training will be provided to all new hires.

14.0 Recordkeeping

- Training records shall be maintained by the Safety Department.
- Documents related to confined space operations, including but not limited to permits, will be maintained in the applicable Project file.

15.0 Related Documents

- Lockout / Tagout policy
- Safe Work Planning policy
- Pre Project Planning and Hazard Assessment
- Appendix A: Alternative Procedures Checklist
- Appendix B: Confined Space Permit

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CONFINED SPACE ALTERNATIVE PROCEDURES CHECKLIST
Permit Required Space

For confined space work where there are no physical hazards, these Alternate Procedures are allowed for permit-required confined space entry in lieu of OSHA's full permit-required procedures.

If the procedures below cannot be met, please stop what you are doing and reassess entry immediately:

Exposure	Exposure Eliminated Y/N
Are all physical hazards in the space 100% eliminated or isolated through engineering controls?	
Can we demonstrate that continuous forced air ventilation alone is sufficient to maintain the space as safe for entry and eliminate or control the atmospheric hazards?	
In the event the ventilation system stops working, will entrants be able to exit the space safely?	
Is the air supplied to this space from a safe source and directed to the area where employees will be working and remain in place until after they have exited?	
Air monitoring was conducted prior to and is being used 100% of the time employees are in the space with the initial monitoring testing for oxygen content, flammable gases, flammable vapors and potential toxic air contaminants (in that order)?	
Can we obtain the monitoring data required above without entry into the permit space?	

If the Answer above is NO, we must STOP! These procedures **CANNOT** be used, and we **MUST NOT ENTER without an approved PERMT**

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Written Certificate for Alternate Procedures

Date: _____

Location of Confined Space: _____

Alternate Procedures Pre-Entry Atmospheric Testing Results		
Test	**Conditions Safe**	**Actual Readings**
Oxygen levels between 19.5 and 23.5*	☐ Yes ☐ No	
Flammable gas, vapor or mists are not over 10% of LFL*	☐ Yes ☐ No	
Airborne combustible dust levels do not meet or exceed LFL*	☐ Yes ☐ No	
Toxic gases and vapors do not exceed PEL*	☐ Yes ☐ No	
Other atmospheric conditions*	☐ Yes ☐ No	

* Atmospheric conditions must be safe or entry cannot proceed. Tests above must be conducted in the order listed.

Printed Name of Competent Person Assessing Alternate Procedures:_____

Signature of Competent Person Assessing Alternate Procedures: _____

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CONFINED SPACE ENTRY FORM

PROJECT NAME AND #_____ **DATE:**_____

PERMIT START TIME:_____**AM PM** **PERMIT END TIME:**_____ **AM PM**

LOCATION OF CON. SPACE:_____

DESCRIPTION OF CON. SPACE:_____

PURPOSE OF ENTRY:_____

SPECIAL REQUIREMENTS:

	Yes	No		Yes	No
Lockout De-energize	☐	☐	Escape Harness	☐	☐
Lines broken-capped or blanked	☐	☐	Ventilation	☐	☐
Purge-flush and vent	☐	☐	Lifelines	☐	☐
Tripod emergency escape unit	☐	☐	Fire Extinguishers	☐	☐
Secure Area	☐	☐	Lighting	☐	☐
Breathing apparatus/respirators	☐	☐	Protective Clothing	☐	☐

AIR MONITORING

DO NOT ENTER IF PERMISSLBE EXPOSURE LIMITS (PEL) ARE EXCEEDED

PEL		Time of Test (Hourly Interval Minimums)							
O_2	19.5-22%								
LEL	<10%								
H_2S	<10 PPM								
CO	<35PPM								

Note: Testing shall occur before entry and continuously throughout operations

INSTRUMENT USED FOR TESTING:_____

RESCUE AND EMERGENCY RESPONSE PROTOCOLS (if any):

AUTHORIZED ENTRANTS: _____ _____

_____ _____

ATTENDANTS: _____ _____

SUPERVISOR: _____

PERMIT AUTHORIZATION: The information on this permit has been evaluated, the site has been examined, and all necessary safety measures are in place.

Printed Name:	**Signature:**

PERMITS ARE VALID FOR THE LESSER OF 8 HOURS, UNTIL END OF SHIFT, OR SPACE CONDITIONS CHANGE

Policy / Procedure: **Control of Hazardous Energy (Lock Out/Tag Out)**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

This Policy establishes the minimum requirements for the lockout of energy-isolating devices whenever maintenance or servicing is done on heavy equipment or machinery and ensures that equipment or machinery is stopped, isolated from all potentially hazardous energy sources, and locked out before employees perform any servicing or maintenance where the unexpected energization, start-up, or release of stored energy could cause injury.

2.0 Purpose/Scope

This Policy applies to all workplaces in which hazards associated with the unexpected energization of any machinery or equipment during servicing or maintenance occurs. (Service and maintenance of equipment, both large and small, are included under the standard.) All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source.

3.0 Definitions

- Affected person: an individual who is servicing, maintaining, repairing, or replacing machinery/equipment under Lock Out/ Tag Out (LOTO), or any other worker in the area of these activities.
- Authorized Employee: an employee who locks and/or tags out machines or equipment to perform servicing or maintenance.
- Energized: the connection of a machine or equipment to an energy source or contains residual or stored energy.
- Energy isolating device: a mechanical device that physically prevents the transmission or release of energy, including but not limited to the following: a manually operated electrical circuit breaker; a disconnect switch; a line valve; a block; or any similar device used to block or isolate energy. Push buttons, selector switches and other control circuit type devices are not energy isolating devices.
- Energy source: any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, radiological, or other energy.
- Lock Out: the placement of a lock out device on an energy isolating device to ensure that the energy isolating device, e.g., disconnect switch, and the equipment being controlled cannot be operated until the lock out device is removed. The term "lock out" as used in these procedures includes "tag out".
- Lock Out Device: a device that uses a positive means, such as a key or combination lock, to hold an energy isolating device in a safe position and prevent the energizing of the mechanical equipment or machinery.
- Servicing and/or Maintenance: Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. These activities include lubrication, cleaning or un-jamming of machines or equipment, and adjustments or tool changes, where the employee may be exposed to the unexpected energizing or start-

up of the equipment or release of hazardous energy.

- Stored energy: Energy that remains in a machine or piece of equipment once that machine has been turned off and isolated from its source of energy. Stored energy may be contained in devices such as springs, flywheels, capacitors, or pressure systems (hydraulic, air, gas, steam, and water).

- Tag Out: The placement of a tag out device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tag out device is removed.

- Tag Out device: A prominent warning device, such as a tag and its means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure. This device must indicate that the energy isolating device and the equipment being controlled may not be operated until the tag out device is removed.

4.0 Responsibilities

- **Supervisors** are responsible for ensuring that their crew members that may be exposed to the potential release of hazardous energy (any Authorized employee) understand the requirements of this Policy.

- **All employees** are required to comply with the restrictions and limitations imposed upon them by this policy, including during the use of lockout. Additionally, **All Employees**, upon observing a machine or piece of equipment that is locked out to perform servicing or maintenance, shall not attempt to start, energize, or use that machine or equipment. All employees must exercise their Stop Work Authority anytime they observe any violation of this Policy.

- **Authorized Employees** are required to perform lockout in accordance with this procedure.

5.0 General Procedures

- **Inspections**: Periodic inspections of the energy control procedure must be conducted at least annually to ensure that the procedure is being followed. These inspections will be completed by Safety personnel. A certified review of the inspection including date, equipment, employees, and the inspector should be documented.

- **Lock Out Devices**: Lock Out devices are to be:
  - Durable
  - Standardized throughout the location where the procedures apply.
  - Substantial enough to prevent easy removal.
  - Indicate the identity of the employee who has applied the device.
  - Attached in a manner that ensures the energy isolation device is held in the off or safe position

- **Application of Locks and Tags**:
  - Lock out and tag out devices will only be applied by an Authorized Employee.
  - Lock Out Devices will be applied to energy isolation devices in a manner that ensures the point remains in the off or "safe" position.
  - A tag or label will be affixed to the lock out device that indicates what is locked out, who locked it out, and when it was locked out.
  - When lock out is not feasible and tag out is used, tag out devices shall be:
    - Applied in a way that can clearly indicate the energy isolation point is in the off or "safe" position.
    - Applied as close to the energy isolation device as feasible in those situations where

it cannot be applied directly so that it is easily recognizable by anyone attempting to access the isolation device.
    - Applied in the same location as a lock out device would be applied in situations where tag out is used in place of lock out

- **Sequence of Lockout/Tagout for Heavy Equipment**:
    - The following procedures shall be used when locking out / tagging out heavy equipment. Heavy equipment includes the following:
        - Excavators
        - Dozers
        - Tractors
        - Quad axle trucks
        - Wheel loaders
        - Skidsteers
        - Articulating trucks
        - Graders
        - Sweepers
        - Water Trucks
        - Trailers and Automobiles
    - Notify all Affected Persons that service or maintenance is required on the equipment and the equipment must be shut down and locked out to perform the servicing or maintenance.
    - The Authorized Employee shall identify the type and magnitude of the energy that equipment utilizes, shall understand the hazards of the energy, and shall know the methods to control the energy.
        - Heavy equipment can utilize hydraulic, electrical, or air energy sources.
    - The Authorized Employee shall comply with the following procedure before performing service or maintenance on any heavy equipment:
        - Power off the equipment (shut off ignition, remove any ignition key and place in safe location, and shut off master switch in engine compartment).
        - Attach "Out of Service" tag to the steering wheel
        - Attach "Warning" tape across doorway (entrance) to machine
        - Ensure hydraulic position lockout arm is in place, where needed
        - Relieve hydraulics and other residual energy by rocking auxiliary handle/lever
        - Isolation of energy shall be verified before continuing. Test for "Zero Energy" by trying to start the equipment. Be sure it will not start.
        - Perform necessary maintenance, service, or adjustments to equipment.
    - The Authorized Employee shall comply with the following procedures when restoring equipment to service:
        - Engage master switch to re-energize machine
        - Insert key into ignition
        - Raise hydraulics to release hydraulic locks
        - Check all equipment functions to verify everything is working properly.
        - Remove all lockout/tagout warning tags/tape.
        - Notify Affected Persons that the equipment is safe for use.

- **Sequence of Lockout/Tagout for Machinery**:
    - The following procedures shall be used when locking out/tagging out machinery. Machinery includes the following:
        - Screw conveyor
        - Bucket elevator
        - Compressor
        - Air slide
        - Material transfer piping
        - Fans

- Blowers
- Motors
- Pumps
- Control panel
- Generators

- Notify Affected Employees that the machinery is being locked out for maintenance.
- The Authorized Employee shall comply with the following procedure before performing service or maintenance on any machinery:
  - Shut down the machinery safely, if not already down.
  - Isolate hazardous energy sources by placing switches, breakers, and valves in the proper position and applying lock/tags.
    - Machinery can utilize electrical, mechanical, hydraulic, pneumatic, chemical, and/or thermal energy sources.
  - Block/Jack/Pin raised components and other potential mechanical energy sources.
  - Release stored energy by draining, bleeding down, and applying grounds.
  - Verify that energy is isolated before continuing.
    - Test for "Zero Energy" by trying to start the equipment.
    - Be sure it will not start.
- The Authorized Employee shall comply with the following procedures before restoring machinery to service:
  - Search the machinery for personnel, tools, and loose parts. Remove them if necessary.
  - Replace safety guards.
  - Remove Locks.
  - Notify Affected Employees that lockout/tagout has been removed.

- **Group Lockout/Tagout:**
  - When servicing and/or maintenance is performed by a crew, craft, department, or other group, they shall utilize a procedure which affords the employees a level of protection equivalent to that provided by the implementation of a personal lockout or tagout device.
  - Group lockout or tagout devices shall be used in accordance with the procedures required by the OSHA standard (1910.147) including, but not necessarily limited to, the following specific requirements:
    - Primary responsibility is vested in an Authorized Employee for a set number of employees working under the protection of a group lockout or tagout device (such as an operations lock).
    - Provision for the Authorized Employee to ascertain the exposure status of individual group members with regard to the lockout or tagout of the machine or equipment.
    - When more than one crew, craft, or department is involved, assignment of overall job-associated lockout/tagout control responsibility to an Authorized Employee designated to coordinate affected work forces and ensure continuity of protection.

6.0 Recordkeeping

- Maintenance and shop personnel will maintain all equipment maintenance records.

7.0 Training

- All new field employees receive familiarization training with lock out / tag out procedures during new hire orientation.
- Retraining shall also be conducted whenever a periodic inspection reveals, or whenever the employer has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

Policy / Procedure: **Cranes and Derricks**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

Edgerton does not perform field lifting, or picking, by using cranes or derricks and, therefore, all employees are to avoid such operations. Edgerton employees who use or work around Overhead Cranes shall abide by this policy to ensure Overhead Cranes are operated in a safe manner.

2.0 Purpose/Scope

This Policy applies to all Edgerton employees and aims to provide the safe working practices and procedures for working with and around Overhead Cranes, and avoiding injury or illness associated with crane operations.

3.0 Definitions

- Overhead Crane: An Overhead Crane is any crane with a movable bridge carrying a movable or fixed hoisting mechanism and traveling on an overhead fixed runway structure and refers to the Company's Overhead Cranes located in its shop locations in Oak Creek and Madison, WI.

- Truck or Vehicle Crane: A Truck or Vehicle Crane is a mobile crane that is mounted to a truck or vehicle chassis that is capable of hoisting, lowering, and/or horizontally moving a suspended load and refers to the Company's fleet vehicles, including mechanic's trucks, with crane mounts.

4.0 Responsibilities

- The **Shop Superintendent** is responsible for implementing and confirming compliance with this Policy. The **Shop Superintendent** shall also be responsible for all inspection and recordkeeping requirements under this Policy.

- **Mechanics** who utilize Overhead Cranes or Truck or Vehicle Cranes are responsible for strictly complying with this Policy and ensuring that they possess the proper qualifications, experience, and training to safely operate Overhead Cranes or Truck or Vehicle Cranes and identify and mitigate hazards associated with operations.

5.0 General Requirements

- Edgerton does not provide lifting, or picking, services that require use of mobile cranes or derricks. If Edgerton's scope of work requires use of mobile cranes or derricks, or similar regulated lifting equipment, such services will be subcontracted to a qualified contractor qualified to perform those operations.
    - Any lifting or rigging performed with excavation equipment shall be governed by the Company's Rigging Policy.

- **Overhead Cranes**: The Company utilizes Overhead Cranes in its shop locations in Oak Creek and Madison. All operations of the Overhead Cranes shall comply with the following:
    - Only personnel possessing the proper qualifications, experience, and training are permitted to operate Overhead Cranes.
    - Operations must comply with all manufacturer recommendations and instructions. Rated load capacities, operating speeds, and/or other special hazard warnings should remain conspicuously posted on Overhead Crane equipment.

- Overhead Cranes and components must be inspected prior to each shift, and before use. Any defects, damage, or operating issues must be repaired prior to use. If repair cannot be completed the Overhead Crane should be taken out of operation and conspicuously labeled to prevent use. All repairs should comply with manufacturer's recommendations.
- The area within the footprint of the Overhead Crane's fixed runway should be inspected prior to operation to prevent any person or equipment from being struck.
- Monthly and annual inspection shall be documented by the Shop Superintendent or other designated qualified person.
- The use of the Overhead Crane to hoist employees on a personnel platform is prohibited.

- **Truck or Vehicle Cranes:**
  - Only personnel possessing the proper qualifications, experience, and training are permitted to operate Truck or Vehicle Cranes. Qualified persons include mechanics assigned to operate the Truck or Vehicle Cranes.
  - Operations must comply with all manufacturer recommendations and instructions. Rated load capacities, operating speeds, and/or other special hazard warnings should remain conspicuously posted on Overhead Crane equipment.
  - All components must be inspected prior to use. Any defects, damage, or operating issues must be repaired prior to use. If repair cannot be completed the entire vehicle should be taken out of operation. All repairs should comply with manufacturer recommendations and lock out / tag out procedures should be used as necessary.
  - Truck or Vehicle Cranes should never be used to move objects horizontally, nor should they be used to hoist personnel.
  - An annual inspection shall be made by the Shop Superintendent or other designated qualified person.

- **General Crane Operation Safety:** Crane operations can occur on Company jobsites and adjacent to Company operational footprints. The following safety rules apply when performing operations near or adjacent to crane or rigging operations:
  - Company employees are not be participate in any lift plan or crane operations performed by third parties.
  - Never bypass red caution tape or any exclusion zone marked for lift operations.
  - Never operate vehicles or equipment within any lift operation exclusion zone, under any crane equipment, or in the path of travel of crane operations.
  - ALWAYS STAY CLEAR OF SUSPENDED LOADS.

6.0 Recordkeeping

- Inspection materials should be maintained in the shop location where the Overhead Crane is present and saved electronically as necessary.

7.0 Related Documents

- Rigging policy

Policy / Procedure: **Demolition Safety**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All employees engaged in demolition operations for the Company are required to understand and comply with this Policy to ensure safe work practices for all demolition operations and to eliminate or mitigate any hazards associated with those operations.

2.0 Purpose/Scope

This Policy applies to all demolition operations performed by the Company. The Policy provides the minimum requirements to ensure demolition operations are performed in a safe manner and to eliminate or drastically reduce demolition related incidents.

3.0 Definitions

- Competent Person: A person capable of identifying existing and predictable hazards in the surroundings or working conditions, which are hazardous or dangerous to employees. A person who has the authorization to take prompt corrective action to eliminate such hazards.

4.0 Responsibilities

- The **Project Manager**, **Supervisor**, and **Safety Personnel** assigned to a project where demolition work will be performed are responsible for preparing a Demolition Plan under this Policy.

- **Supervisors** and **Project Managers** are responsible for ensuring compliance with all Demolition Plans on projects to which they are assigned.

- **All Employees** performing demolition work should understand this policy and familiarize themselves with the Demolition Plan related to any project on which they are performing demolition operations.

5.0 General Procedures

- **Planning Requirements and Procedures**: the following shall be done prior to commencing demolition operations:

    - The Project Manager for the project (in collaboration with a Safety Representative and Supervisor) must prepare a Demolition Plan that identifies, at a minimum, the methods to be used, equipment and manpower required, sequencing of demolition work, potential hazards associated with the demo, any relevant hazard mitigations, and any necessary steps to ensure protection of the public. The Project Manager may engage a third-party engineer or consultant to evaluate the existing structure to validate the Demolition Plan.
        - The Demolition Plan should account for fire safety, including emergency response and action to be taken in the event of a fire. The following should be considered:
            - An evacuation plan in the event of a fire.
            - Evaluation of potential sources of ignition.
            - Sufficient distance between electrical equipment and combustibles.
            - Fire extinguishers or other required firefighting equipment will be located near any flammables or combustibles.

        - The Company's fire prevention policy should be reviewed for compliance.
    - The structure to be demolished will be checked throughout for materials containing asbestos, lead, or other known or suspected hazardous materials, with particular attention paid to fire protection and heating, ventilating and air conditioning duct work. All paint surfaces need to be checked for lead.
        - If asbestos or lead is detected, it shall be removed according to applicable standards and regulations and the Company's applicable policies covering those hazard substances.
    - Prior to any demolition of an existing structure, an engineering survey of the structure to be demolished must be performed or confirmed. This survey may be in writing or verbal from a competent person (including third-party) who has evaluated the condition and structural stability of the structure, and presence of utilities. Survey confirmation from a general contractor or owner is sufficient.
    - Determine the appropriate safety equipment needed, including Personal Protective Equipment, warning signs, fall protection systems, and other worker protection as deemed necessary during pre-planning and the engineering survey.
    - All utilities (public and private) within the footprint of the demolition must be identified. All electric, gas, water, steam, sewer, and other service lines must be shut off, capped, or controlled, at or outside the building before demolition begins.
        - If any power, water, or other utilities need to be maintained during demolition, such lines must be temporarily relocated as necessary and protected.
        - Any utility company involved in the relocation or support of a utility to complete demolition operations must be notified.
        - The location of all overhead power sources must also be determined. Workers will be informed of the location of any existing or relocated utility service.
        - Notice must be provided to the utility owner, including requests to disconnect.
        - The Project Manager, Supervisor, or other field manager must perform a walkthrough of the demolition area to confirm utilities are disconnected.
    - Provisions will be made for prompt medical attention in case of serious injury.
        - The nearest hospital, infirmary, clinic, or physician will be identified and proper equipment for rescue of an injured worker will be readily available.
        - Ensure availability of a communication system to contact any necessary ambulance service to the job site.
        - A properly stocked first aid kit as determined by an occupational physician will be available at the job site where the demolition is occurring.

- **Demolition Operations**: the following requirements apply to active demolition operations performed by the Company:
    - The Demolition Plan prepared prior to demolition must be complied with at all times.
        - Normal Job Hazard Analysis (JHA's) requirements are in effect for demolition operations. JHA's and daily plans related to demolition operations should focus on identifying hazards and mitigations related to the demolition work prepared for that day.
    - All demolition work must be performed in a controlled manner.
    - During demolition, inspections by a competent person will be made as the work progresses to detect hazards resulting from weakened or deteriorated floors, walls, or loosened material. No worker will be permitted to work where such hazards exist until they are corrected by shoring, bracing or other effective means.
    - All entrances, stairs, and passageways must be inspected, maintained, and properly illuminated.
    - If the structure has been damaged by fire, flood, explosion, or some other cause, appropriate measures, including bracing and shoring of walls and floors, will be taken to protect workers and any adjacent structures.

- Floor openings used for material disposal must not be more than 25% of the total floor area and must be completely enclosed with barricades not less than 42 inches high and not less than 6 feet back from the projected edge of the opening above. Signs containing a warning of falling materials must be posted at every level, and removal must not be permitted in the lower area until debris handling ceases above.
- All floor openings not being used as material drops should be covered with material substantial enough to support the weight of any imposed load, and such material must be properly secured to prevent accidental movement. Any hole covering should be clearly marked.
- The Company should confirm that the controlling contractor or owner (if Company is not the controlling contractor) has established barricades to prevent public access to the area of demolition. Appropriate signage should be placed to identify the area as a construction zone.
- All employees engaged in demolition operations should be equipped with standard Personal Protective Equipment required at all jobsites—see Personal Protective Equipment Policy. Additionally, adequate fall protection should be utilized to mitigate or eliminate employee exposure to fall hazards at a demolition site.

6.0 Recordkeeping

- Demolition Plans, engineering surveys, and demolition operations-related documents must be retained in the relevant Project folder. This includes utility location or disconnect notices, waste disposal documentation, etc.

7.0 Related Documents

- Fire Prevention and Protection policy
- Lead policy
- Asbestos policy
- Fall Protection policy
- Personal Protective Equipment policy
- Stop Work Authority policy

Policy / Procedure: **Electrical**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company strives to eliminate or mitigate hazards associated with electricity and provides the following guidelines to ensure proper training, experience, awareness and safe work practices for all employees who may work with or around electricity.

2.0 Purpose/Scope

This Policy applies to all employees who work with and/or around electricity, exposed de-energized parts or equipment, and work near any electrical hazard. The Policy provides guidelines for safe work practices involving electricity.

3.0 Definitions

- Exposed: Capable of being inadvertently touched or approached nearer than a safe distance by a person. It is applied to parts that are not suitably guarded, isolated, or insulated.
- Ground: A conducting connection, whether intentional or accidental, between an electrical circuit or equipment and the earth, or to some conducting body that serves in place of the earth.
- Ground Fault Interrupter (GFCI): A device intended for the protection of personnel that functions to de-energize a circuit or portion of a circuit within an established period of time.
- Guarded: Covered, shielded, fenced, enclosed, or otherwise protected by means of suitable covers, casing, barriers, rails, screens, mats or platforms to remove the likelihood of approach to a point of danger to contact by persons or objects.
- Qualified Person: One who has received training in and has demonstrated skills and knowledge in the construction and operation of electric equipment and installations and the hazards involved.

4.0 Responsibilities

- **Project Managers** and **Supervisors** are responsible for ensuring their crew employees understand the requirements of this Policy and are responsible for policy implementation and compliance.
- **Safety Personnel** are responsible for assisting with the selection and availability of PPE required of any scope of work that involves working with or around electricity and ensuring proper safe work planning for all projects involving work with or around electricity.
- All **Employees** are responsible for the following:
  - Knowing and identifying the hazards of their work and being aware of energized equipment within their work environment
  - Following all safe work practices required of this policy, including ensuring proper training, experience, or awareness to safely perform all work with or around electricity
  - Exercising Stop Work Obligation whenever confronted with an unsafe activity or condition
  - Using proper PPE for all scopes of work that involving work with or around electricity

5.0 General Procedures

- **General Safe Work Practices:**
  - Only a Qualified Person may work on electrical parts or equipment. The Qualified Person must be familiar with the use of special precautionary techniques, such as PPE, shielding or insulating tools and materials, and such work must be done under applicable guidelines, including but not limited to the National Electrical Code (NEC), National Electric Safety Code, (NESC) and National Fire Protection Association (NFPA).
  - Non-qualified employees are to be trained in the potential electrical hazards they may encounter while conducting their job tasks and the safe work practices to prevent injury.
  - Employees are not authorized to work in such proximity to an electric power circuit where the employee could potentially contact the circuit during their course of work. If the employee is protected against electrical shock by de-energizing the circuit, relocating the energy, guarding it with insulation, or other means, the employee can work closer to circuit.
  - When working with or exposed to electrical hazards, conductive items are not to be worn unless they are covered, wrapped, or insulated by other means.
  - Barriers or other means of guarding must be used to ensure that the workspace containing electrical equipment will not be used as a passageway during periods when energized parts of equipment are exposed.
  - In work areas where the exact location of underground electrical power lines is unknown, employees must comply with utility location requirements, including contacting the appropriate 8-1-1 or Digger's Hotline service to perform a utility locate.
  - When using jack hammers, bars, or other hand tools close to electrical sources, workers must be protected by insulated electrical safety gloves, aprons, or other protective clothing that will provide equivalent electrical protection.
  - Equipment or circuits that are de-energized must be rendered inoperative, and the lockout/tagout procedure must be followed for all points where equipment or circuits could be energized.
  - When working on or near exposed de-energized parts, these parts must be treated as live. Only qualified persons may work on energized parts.
  - Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
  - Protective shields, protective barriers or insulating materials as necessary shall be used when working in confined or enclosed work spaces where electrical hazards may exist.
  - Conductive apparel, such as jewelry, shall not be worn unless the items are rendered nonconductive by covering, wrapping, or other insulating means.

- **Extension Cords:** Cords should be inspected prior to each use. Worn or frayed electrical cords or cables must not be used. Extension cords must be protected from damage and cannot be fastened with staples, hung from nails, or suspended by wire. Flexible cords must be connected to devices and fittings, so strain relief is provided which will prevent pulling from being directly transmitted to joints or terminal screws.

- **Overhead Power Lines:** Operations involving the use of aerial lifts, boom trucks, telescoping forklifts, or other equipment in close proximity of power and transmission lines, are to be operated in accordance with manufacturer's specifications and in compliance with the OSHA regulations identifying distances listed below, or they must be deenergized by the utility owner:

Voltage (Nominal, kv, Alternating Current	Minimum Clearance Distance (feet)	(meters)
Up to 50	10	3
Over 50 to 200	15	4.5
Over 200 to 350	20	6
Over 350 to 500	25	7.5
Over 500 to 750	35	10.5
Over 750-1,000	45	14
Over 1,000	(as established by the utility owner / operator or registered professional engineer who is qualified with respect to electrical power transmission and distribution)	

- **Lamps and Temporary Lighting:**
  - Lamps for general illumination must be protected from breakage, and metal shell sockets must be grounded.
  - Temporary lights must not be suspended by the cords unless they are so designed. Portable lighting used in wet or conducive locations, such as tanks or boilers, must be operated at no more than 12 volts or must be protected by GFCIs.
  - Extension cords must be of three-wire type, rated for outdoor use, and be of construction grade. Extension cords and flexible cords used with temporary and portable lights must be designed for hard or extra hard usage (for example, types S, ST, and SO).

- **Ground Fault Protection:**
  - A daily visual inspection must be made of the following to determine any external defects or indications of internal damage prior to use: cord sets, attachment cap, plug and receptacle of cord sets, and any other equipment connected by cord and plug (with the exception of cord sets and receptacles which are fixed and not exposed to damage) such as deformed or missing pins, crushed or damaged plugs, and insulation damage. Equipment found to be damaged must be tagged "Do Not Use" and removed from service until repaired and tested.
  - All 120 volt, single-phase, 15 and 20 ampere receptacle outlets that are not part of the permanent wiring of the building or structure must have approved GFCIs for personnel protection. Work areas which contain water or moisture must be protected by GFCIs.

- **Assured Equipment Grounding Conductor Program (non GFCI):**
  - In the event that the above-ground fault protection requirements (GFCI's) are not in use, the following standards apply.
  - Testing must be conducted at intervals not to exceed three (3) months on all cord sets, receptacles which are not a part of the permanent wiring of the building or structure, and any Edgerton owned cord and plug-connected equipment required to be grounded. Grounding conductors must be tested for continuity.
  - Tests performed as required in this program must then be color coded. The color code will identify each receptacle, cord set, and cord and plug-connected equipment that passed the tests and indicates the appropriate calendar quarter for which it was tested. Identification must be by the appropriate colored tape.

Quarter	Color
Jan. 1-March 31	White
April 1-June 30	**Green**
July 1-Sept. 30	**Red**
Oct. 1-Dec. 31	**Orange**

- All cord sets and cord and plug-connected equipment must have this color identification on it. If not properly identified by color, it must be removed, tested, and properly identified prior to use.

6.0 Training

- Employees who face the risk of electric shock but who are not qualified person shall be trained and familiar with electrical related safety practices.
- Employees shall be trained in safety-related work practices that pertain to their respective job assignments.

7.0 Recordkeeping

- Safety will retain all training records related to this Policy.

8.0 Related Documents

- Fire Protection policy

EDGERTON

Policy / Procedure: **Excavation Safety Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Company excavation operations must comply with the guidelines and requirements of this Excavation Safety Program and OSHA's Excavation standards in 1926 Subpart P.

2.0 Purpose/Scope

This Excavation Safety Program has been developed to protect employees from hazards that may be encountered during work in trenches and excavations and to comply with OSHA regulations governing Excavations, found in 1926 Subpart P. The program is intended to ensure that Company employees who perform work in excavations possess the requisite training and experience and are aware of their responsibilities to perform the work safely and in compliance with prevailing standards.

3.0 Definitions

- Accepted engineering practices: The standards of practice required by a registered professional engineer.
- Benching or Benching System: A method of protecting employees from cave-ins by excavating the sides of an excavation to form one or more horizontal steps, usually with vertical or near- vertical surfaces between levels.
- Cave-In: The movement of soil or rock into an excavation, or the loss of soil from under a trench shield or support system, in amounts large enough to trap, bury, or injure and immobilize a person.
- Competent Person: A person who has been trained to identify hazards in the workplace, or working conditions that are unsafe for employees, and who has the authority to have these hazards corrected, as related to services performed in an excavation. For purposes of this Policy, a Competent Person shall be a supervisor or other operational personnel supervising active operations.
- Excavation: Any man-made cut, cavity, trench, or depression in an earth surface formed by earth removal.
- Faces or sides: The vertical or inclined earth surfaces formed as a result of excavation work.
- Failure: The movement or damage of a structural member or connection that makes it unable to support loads.
- Hazardous atmosphere: An atmosphere that is explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen-deficient, toxic, or otherwise harmful, that may cause death, illness, or injury.
- Protective System: A method of protecting employees from cave-ins, from material that could fall or roll from an excavation face into an excavation, or from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide the necessary protection.
- Ramp: An inclined walking or working surface that is used to gain access to one point from another. A ramp may be constructed from earth or from structural materials such as steel or wood.

- Shield system: A structure used in an excavation to withstand cave-ins, and which will protect employees working within the shield system. Shields can be permanent structures or portable units moved along as work progresses. Shields used in trenches are usually referred to as trench boxes or trench shields.

- Shoring system: A structure that is built or put in place to support the sides of an excavation to prevent cave-ins.

- Sloping system: Sloping the sides of an excavation away from the excavation to protect employees from cave-ins. The required slope will vary with soil type, weather, and surface or near surface loads that may affect the soil in the area of the trench (such as adjacent buildings, vehicles near the edge of the trench, etc.).

- Stable Rock: Natural solid mineral material that can be excavated with vertical sides that will remain intact while exposed. See Appendix A: Soil Testing.

- Structural ramp: A ramp built of steel or other sturdy material, usually used for vehicle access. Ramps made of soil or rock are not considered structural ramps.

- Support system: A structure used as underpinning, bracing or shoring, which provides support to an adjacent structure, underground installation, or the sides of an excavation.

- Tabulated data: Tables and charts approved by a Registered Professional Engineer and used to design and construct a protective system.

- Trench*:* A narrow excavation (in relation to its height) made below the surface of the ground.

- Trench box or trench shield: See "Shield system."

- Uprights*:* The vertical members of a trench shoring system placed in contact with the earth and usually positioned so the individual members do not contact each other. Uprights placed so that individual members are closely spaced, in contact with or interconnected to each other, are often called sheeting.

- Wales: Horizontal members of a shoring system placed in the direction of the excavation face whose sides bear against the vertical members of the shoring system or earth (the uprights or sheeting).

4.0 Responsibilities

- **Competent Person**, which is the **Supervisor** or another operational team member with supervisory authority over operations, is responsible for complying with the Inspection Requirements of this Program.

- **Supervisors** are responsible for administering this Program and ensuring compliance during all operations they supervise, including but not limited to the following:
  - Ensuring atmospheric testing and equipment selection, as needed.
  - Ensuring crew members' use of Personal Protective Equipment (PPE), as needed.
  - Ensuring use of the appropriate Protective Systems, as needed.
  - Performing pre-excavation operation inspections, if acting as the Competent Person.

- **Engineering Manager** is responsible for complying with this Program and, specifically, ensuring the proper Protective Systems are utilized for all Company excavation operations—in compliance with this Program, Appendix B, and OSHA 1926 Subpart P Appendix B.

The **Engineering Manager** (or a delegee) is also responsible for communicating if any excavation should be treated as any Soil Classification other than C. This communication can come by way of design drawings, models, or similar documents.

- **Project Managers** are responsible for implementing this Program and ensuring compliance.
- **All Employees** who work in or around excavations, are responsible for understanding and complying with the requirements of this Program.

5.0 General Procedures

- **Pre-Excavation Assessment Requirements:**
  - All excavations shall utilize Protective Systems as indicated on plans and drawings, or as confirmed through the Engineering Manager. ALWAYS CONSULT PLANS AND DRAWINGS.
    - In the absence of plans, drawings, or confirmation from a member of engineering, all soil must be treated as "Type C" soils when considering sloping, shoring, shielding.
  - The Project Manager and/or Supervisor and Safety Representative and member of engineering will assess site information before excavation is started to determine what safety measures are to be taken during excavation operations.
  - All surface encumbrances that create a hazard to employees shall be removed or supported as necessary.
  - Prior to the start of excavation, it must be determined if the excavation work could affect the stability of adjoining buildings, walls, sidewalks, or other structures.
    - Support systems (such as shoring, bracing, or underpinning) shall be used to assure the stability of structures and the protection of employees where excavation operations could affect the stability of adjoining buildings, walls, or other structures.
    - Excavations below the level of the base or footing of any foundation or retaining wall that could be reasonably expected to pose a hazard to employees shall not be permitted, except when:
      - A support system, such as underpinning, is provided to ensure the safety of employees and the stability of the structure.
      - The excavation is in stable rock.
      - A registered professional engineer has approved the determination that the structure is sufficiently removed from the excavation so as to be unaffected by the excavation activity
      - A registered professional has approved the determination that such excavation work will not pose a hazard to employees.
    - Sidewalks, pavements, and appurtenant structures shall not be undermined unless a support system or other method of protection is provided to protect employees from the possible collapse of such structures.
    - Where review or approval of a support system by a Registered Professional Engineer is required, the review and approval shall be secured in writing before the work begins.
  - Underground sewer, process, telephone, gas, water, and electric lines shall be located and clearly marked pursuant to this policy.
    - Utilities must be protected, removed, or relocated as directed by the Site owner, Utility Owner, or Site Safety Representative or designee and as needed to do the work safely.
    - Utilities left in place shall be protected by barricades, shoring, or other means as necessary.

- **Utility Location Requirements:** prior to performing any excavation work, and as part of the Pre-Excavation Assessment process, the Project Manager or other designated personnel should take steps to locate all private and public utilities within the area to be excavated. The following process should be followed:
    - Contact 811 or the applicable Digger's Hotline agency to request they locate and mark public utilities prior to excavation. The cleared ticket should be saved in the applicable project file.
        - You should have a ticket that has been cleared within 10 days of excavation. If the cleared ticket is dated more than 10 days before commencing excavation, a relocate must be requested.
        - If an unmarked utility is present, or other circumstances exist requiring urgent identification or location of utilities, an emergency locate should be requested.
    - Private utility location is the responsibility of the property owner. The Project Manager must send a private utility notification letter to the property owner or general contractor to notify them of the need to identify and locate private utilities that may conflict with the area of excavation.
    - Utilities must be protected, removed, or relocated as directed by the Site owner, Utility Owner, or Supervisor or designee and as needed to do the work safely.
    - Mechanized equipment should not be used to dig within 18" of marked utility lines. Non-mechanized means of excavation, including potholing by use of hydrovac equipment, can be used to locate the marked utility line. Once located, mechanized equipment can be used to excavate within 12" of the utility. Hand digging (including by use of hydrovac) should be used within 12" of the utility.

- **Excavation Safety Protocols:**
    - Protection of the Public: Barricades, walkways, lighting, and posting shall be provided as necessary for the protection of the public prior to the start of excavation operations.
        - Guardrails, fences, or barricades shall be provided on excavations adjacent to walkways, driveways, and other pedestrian or vehicle thoroughfares.
        - Warning lights or other illumination shall be maintained as necessary for the safety of the public and employees from sunset to sunrise.
        - Wells, holes, pits, shafts, and all similar hazardous excavations shall be effectively barricaded or covered and posted as necessary to prevent unauthorized access. All temporary excavations of this type shall be backfilled as soon as possible.
        - Walkways or bridges protected by standard guardrails shall be provided where employees and the general public are permitted to cross over excavations. Where workers in the excavation may pass under these walkways or bridges, a standard guardrail and toeboard shall be used to prevent the hazard of falling objects.
            - Top rails must be a minimum of 42" above the walking/working area, mid-rails must be a minimum of 21" above the walking/working surface, and toeboards (top edge) must be a minimum of 4" in height above the walking/working surface.

    - Access and Egress: Stairs, ladders, or ramps shall be provided at excavation sites where employees are required to enter trench excavations over four (4) feet deep. The maximum distance of lateral travel (along the length of the trench) necessary to reach the means of egress shall not exceed 25 feet.
        - Structural ramps
            - Structural ramps used solely by employees as a means of access or egress from excavations shall be designed by a Competent Person. Structural ramps used for access or egress of equipment shall be designed by a person qualified in structural design and shall be constructed in accordance with the design.
            - Ramps and runways constructed of two (2) or more structural members

shall have the structural members connected together to prevent movement or displacement.
    - Structural members used for ramps and runways shall be of uniform thickness.
    - Cleats or other appropriate means used to connect runway structural members shall be attached to the bottom of the runway or shall be attached in a manner to prevent tripping.
    - Structural ramps used in place of steps shall be provided with cleats or other surface treatments on the top surface to prevent slipping.
- Ladders
    - When portable ladders are used, the ladder side rails shall extend a minimum of three (3) feet above the upper surface of the excavation.
    - Ladders shall have non-conductive side rails if work is performed near exposed energized equipment or systems.
    - Two (2) or more ladders, or double-cleated ladders, will be provided where 25 or more employees will be conducting work in an excavation where ladders serve as the primary means of egress, or where ladders serve two-way traffic.
    - Ladders will be inspected prior to use for signs of damage or defects. Damaged ladders will be removed from service and marked with a "Do Not Use" tag or sign until repaired.
    - Ladders shall be used only on stable and level surfaces unless secured. Ladders placed in any location where they can be displaced by workplace activities or traffic shall be secured, or barricades shall be used to keep these activities away from the ladders.
    - Non-self-supporting ladders shall be positioned so that the foot of the ladder is one-quarter (1/4) of the working length away from the support (4:1 rule).
    - Employees are not permitted to carry any object or load while on a ladder that could cause them to lose their balance and fall.

- Exposure to Vehicular Traffic: Employees exposed to vehicular traffic shall be provided with, and shall wear, high-visibility safety vests and pants (Class III). Emergency lighting, such as portable lights or spotlights, shall be provided as needed to perform work safely.

- Exposure to Falling Loads: No employee is permitted underneath suspended loads, by any means. Employees are required to stand away from any type of activity involving loading or unloading to avoid being struck by any spillage or falling materials.

- Warning Systems for Mobile Equipment: A warning system shall be used when mobile equipment is being used if the equipment operator does not have a clear and direct view of the edge of an excavation. The warning system shall consist of barricades, hand or mechanical signals, or stop logs. The grade should be away from the excavation.

- Hazardous Atmospheres: Atmospheric testing must be done in excavations over four (4) feet deep if a hazardous atmosphere exists or could reasonably be expected to exist.
    - Adequate precautions shall be taken to prevent employee exposure to atmospheres containing less than 19.5% oxygen and other hazardous atmospheres. These precautions include providing proper respiratory protection or forced ventilation of the workspace.
    - Forced ventilation or other effective means shall be used to prevent employee exposure to an atmosphere containing a flammable gas in excess of 10% of the lower flammability limit of the gas.
    - When controls are used that are intended to reduce the level of atmospheric contaminants to acceptable levels, continuous air monitoring will be performed. The

device used for atmospheric monitoring shall be equipped with an audible and visual alarm.
- Atmospheric testing will be performed using a properly calibrated direct reading gas monitor.
- Atmospheric testing equipment (air monitors) will be calibrated on a regular basis by a member of the Safety Department or qualified designee.
- Each atmospheric testing instrument will be field checked immediately prior to use to ensure that it is operating properly.

- Fall Protection: employees at the edge of an excavation 6 feet (1.8m) or more in depth shall be protected from falling by guardrail systems, fences, barricades when the excavations are not readily seen because of plant growth or other visual barrier.

- Protection from Water Accumulation Hazards:
  - Employees are not permitted to work in excavations that contain or are accumulating water unless precautions have been taken to protect them from the hazards posed by water accumulation. Precautions may include special support or shield systems to protect from cave-ins, water removal to control the level of accumulating water, or use of safety harnesses and lifelines.
  - If water is controlled or prevented from accumulating by the use of water removal equipment, the water removal equipment and operation shall be monitored by a person trained in the use of that equipment.
  - If excavation work interrupts the natural drainage of surface water (such as streams), diversion ditches, dikes, or other suitable means shall be used to prevent surface water from entering the excavation. Precautions shall also be taken to provide adequate drainage of the area adjacent to the excavation. Excavations subject to run-off from heavy rains shall be re-inspected after each rain incident to determine if additional precautions, such as special support or shield systems to protect from cave-ins or water removal to control the level of accumulating water should be used.
  - Affected workers shall be informed of the precautions or procedures that are to be followed if water accumulates or is accumulating in an excavation.

- Protection from Falling Objects and Loose Rocks or Soil:
  - Adequate protection shall be provided to protect employees from loose rock or soil that could pose a hazard by falling or rolling from an excavation face. Such protection shall consist of:
    - Scaling to remove loose material.
    - Installation of protective barricades, such as wire mesh or timber, jersey barriers, or fencing, at appropriate intervals on the face of the slope to stop and contain falling material.
    - Benching sufficient to contain falling material. Excavation personnel shall not be permitted to work above one another where the danger of falling rock or earth exists unless protected or within an cab or other enclosed vehicle or equipment.
  - Employees shall be protected from excavated materials, equipment, or other materials that could pose a hazard by falling or rolling into excavations.
  - Protection shall be provided by keeping such materials or equipment at least two (2) feet from the edge of excavations, by use of restraining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both, if necessary.
  - Materials and equipment may need to be stored further than two (2) feet from the edge of the excavation if a hazardous loading condition is created on the face of the excavation.

- Materials piled, grouped, or stacked near the edge of an excavation must be stable and self-supporting.

- Roadways and Vehicle Protection (Berms)
  - When mobile equipment is operated adjacent to an excavation and an operator does not have a clear and direct view of the edge of the excavation, a warning system must be utilized to protect equipment. Warning systems can include barricades, hand or mechanical signals, or stop logs.
    - It utilizing a berm as a barricade, the berm should be approximately the height of mid-axle of the largest equipment utilizing the road.

- **Inspection Requirements:**
  - Prior to any operations where employees will enter an excavation, a Competent Person (the Supervisor or personnel acting in a project supervisory role) shall inspect the excavation, adjacent areas, and protective systems for evidence of a situation that could result in possible cave-ins, failure of protective systems, hazardous atmospheres, or other hazardous conditions.
  - The inspection shall be conducted prior to the start of work and as needed throughout the shift.
  - Inspections shall also be made after every rain event or other hazard-increasing occurrence.
  - An inspection should include manual soil tests when necessary to verify soil type and ensure safety. See **Appendix A: Soil Testing**.
  - Where there is evidence of a situation that could result in a possible cave-in, failure of protective systems, hazardous atmosphere, or other hazardous conditions, exposed employees shall be removed from the hazardous area until precautions have been taken to assure their safety.
  - The Competent Person shall document the inspection by completing an Excavation Checklist, found in the Job Hazard Analysis (JHA).

- **Protective Systems**
  - Protection of employees
    - Employees in an excavation shall be protected from cave-ins by using either an adequate sloping and benching system or an adequate support or protective system that complies with the requirements of Appendix B and OSHA 1926 Subpart P, Appendix B. The Company will treat all Soil as Class C unless otherwise confirmed by the Engineering Manager or project design drawings.
      - The only exceptions to the above requirement are:
        - Excavations made entirely in stable rock.
        - Excavations less than four (4) feet in depth where examination of the ground provides no indication of a potential cave-in.
    - All excavations more than 20 feet in depth on all sides must be approved by a Registered Professional Engineer.

  - Designs Using other Tabulated Data
    - The design of sloping or benching systems may be selected from, and shall be constructed in accordance with, other tabulated data, such as tables and charts. The tabulated data used must be in written form and include the following:
      - Identification of the factors that affect the selection of a sloping or benching system.
      - Identification of the limits of the use of the data, including the maximum height and angle of the slopes determined to be safe.
      - Other information needed by the user to make correct selection of a protective system.

- At least one (1) copy of the tabulated date that identifies the registered professional engineer who approved the data shall be maintained at the jobsite or readily accessible during construction of the protective system. After that time, the data must be maintained, and can be stored off the jobsite.

- Materials and equipment
  - Materials and equipment used for protective systems shall be inspected prior to each use and free from damage or defects that might affect their proper function.
  - Manufactured materials and equipment used for protective systems shall be used and maintained in accordance with the recommendations of the manufacturer, and in a manner that will prevent employee exposure to hazards.
  - When materials or equipment used for protective systems are damaged, these systems must be examined by a Competent Person to evaluate their suitability for continued use. If the competent person cannot assure that the material or equipment is able to support the intended loads or is otherwise suitable for safe use, then such material or equipment shall be removed from service. The material or equipment shall then be evaluated and approved by a registered professional engineer before being returned to service.

- Installation and removal of supports
  - Members of support systems shall be securely connected together to prevent sliding, falling, kickouts, or other potential hazards.
  - Support systems shall be installed and removed in a manner that protects employees from cave-ins, structural collapses, or from being struck by members of the support systems.
  - Individual members of the support systems shall not be subjected to loads exceeding those that they were designed to support.
  - Before temporary removal of individual support members begins, additional precautions shall be taken to ensure the safety of employees.
  - Removal of support systems shall begin at, and progress from, the bottom of the excavation. Members shall be released slowly. If there is any indication of possible failure of the remaining members of the structure or possible cave-in of the sides of the excavation, the work shall be halted until it can be examined and deemed safe.
  - Backfilling shall progress in conjunction with the removal of support systems from excavations.
  - Employees are not permitted in trenches when shields or other support systems are being installed, removed, or moved vertically.

6.0 Training

- All employees shall be trained in the requirements of this program. Retraining will be performed when work site inspections indicate that an employee does not have the necessary knowledge or skills to safely work in or around excavations, or when changes to this program are made. Training records will be maintained by the Safety Manager.
  - Training Components will include, but not limited to, the following:
    - The work practices that must be followed during excavating or working in excavations.
    - The use of personal protective equipment (PPE) that will typically be required during work in excavations, including but not limited to safety boots, hardhats, safety vests, safety pants, safety glasses, gloves, and fall protection devices.
    - Procedures to be followed if a hazardous atmosphere exists or could reasonably be expected to develop during work in an excavation.

- Emergency and non-entry rescue methods and the procedure for calling rescue services.

- All Competent Persons shall possess the requisite training as a competent person in excavation and trenching.

7.0 Recordkeeping

- All training records will be maintained by the Safety Department.
- Excavation Checklists will be maintained in the respective project folders.

8.0 Related Documents

- Appendix A : Soil Testing
- Appendix B : Protective Systems
- OSHA 1926 Subpart P, Appendix A—Soil Classifications
- OSHA 1926 Subpart B, Appendix B—Sloping and Benching
- OSHA Technical Manual: Excavations: Hazard Recognition in Trenching and Shoring

Determination of Soil Type

OSHA categorizes soil and rock deposits into four types as follows:

1. **Stable Rock** is natural solid mineral matter that can be excavated with vertical sides and remain intact while exposed. It is usually identified by a rock name such as granite or sandstone. Determining whether a deposit is of this type may be difficult unless it is known whether cracks exist and whether or not the cracks run into or away from the excavation.

2. **Type A Soils** are cohesive soils with an unconfined compressive strength of 1.5 tons per square foot (tsf) (144 kPa) or greater. Examples of Type A cohesive soils are often: clay, silty clay, sandy clay, clay loam and, in some cases, silty clay loam and sandy clay loam. (No soil is Type A if it is fissured, is subject to vibration of any type, has previously been disturbed, is part of a sloped, layered system where the layers dip into the excavation on a slope of 4 horizontal to 1 vertical (4H:1V) or greater, or has seeping water.

3. **Type B Soils** are cohesive soils with an unconfined compressive strength greater than 0.5 tsf (48 kPa) but less than 1.5 tsf (144 kPa). Examples of other Type B soils are: angular gravel; silt; silt loam; previously disturbed soils unless otherwise classified as Type C; soils that meet the unconfined compressive strength or cementation requirements of Type A soils but are fissured or subject to vibration; dry unstable rock; and layered systems sloping into the trench at a slope less than 4H:1V (only if the material would be classified as a Type B soil).

4. **Type C Soils** are cohesive soils with an unconfined compressive strength of 0.5 tsf (48 kPa) or less. Other Type C soils include granular soils such as gravel, sand and loamy sand, submerged soil, soil from which water is freely seeping, and submerged rock that is not stable. Also included in this classification is material in a sloped, layered system where the layers dip into the excavation or have a slope of four horizontal to one vertical (4H:1V) or greater.

Layered Geological Strata is where soils are configured in layers, i.e., where a layered geologic structure exists, the soil must be classified on the basis of the soil classification of the weakest soil layer. Each layer may be classified individually if a more stable layer lies below a less stable layer, *i.e.*, where a Type C soil rests on top of stable rock.

Unit Weight of Soils refers to the weight of one unit of a particular soil. The weight of soil varies with type and moisture content. One cubic foot of soil can weigh from 110 pounds to 140 pounds or more, and one cubic meter (35.3 cubic feet) of soil can weigh more than 3,000 pounds.

Test Equipment

- **Pocket Penetrometers** are direct-reading, spring-operated instruments used to determine the unconfined compressive strength of saturated cohesive soils. Once pushed into the soil, an indicator sleeve displays the reading. The instrument is calibrated in either tons per square foot (tsf) or kilograms per square centimeter (kPa). However, Penetrometers have error rates in the range of ± 20-40%.

- **Shearvanes / Torvanes** are used to determine the unconfined compressive strength of cohesive soils. The blades of the vane are pressed into a level section of undisturbed soil, and the torsional knob is slowly turned until soil failure occurs. This direct instrument reading must be multiplied

by 2 to provide results in tons per square foot (tsf) or kilograms per square centimeter (kPa).

Methods for Evaluating Soil Type

The Company treats all soil as Type C for purposes of designing Protective Systems. Normally, however, in order to design the most appropriate protective system, soil type must be determined using a visual test with one or more manual tests. If the soil is subject to vibration or previously disturbed or saturated the soil type must be downgraded. For example a B soil type must be downgraded to a C soil type classification. Soil type shall be determined by the following method:

1. **Visual Test (to be completed on ALL excavations):**
   a. The entire excavation site, including the soil adjacent to the site is observed. During the visual test, the area should be checked for crack-line openings along the failure zone that indicate tension crack and the open side of the excavation should be observed for indications of layered geologic structuring. Other conditions to look for are signs of bulging, boiling, or sloughing, as well as signs of surface water seeping from the side of the excavation or from the water table.

2. **Manual Tests (Select one or more as necessary):**
   a. Thumb Penetration Test. The thumb penetration procedure involves an attempt to press the thumb firmly into the soil in question. If the thumb makes an indentation in the soil only with great difficulty, the soil is probably Type A. If the thumb penetrates no further than the length of the thumb nail, it is probably Type B soil, and if the thumb penetrates the full length of the thumb, it is Type C soil.
   b. Dry Strength Test. Dry soil that crumbles freely or with moderate pressure into individual grains is granular. Dry soil that falls into clumps that subsequently break into smaller clumps (and the smaller clumps can be broken only with difficulty) is probably clay in combination with gravel, sand, or silt. If the soil breaks into clumps that do not break into smaller clumps (and the soil can be broken only with difficulty), the soil is considered unfissured unless there is visual indication of fissuring.
   c. Plasticity or Wet Thread Test. This test is conducted by molding a moist sample of the soil into a ball and attempting to roll it into a thin thread approximately 1/8 inch in diameter (thick) by 2 inches in length. The soil sample is held by one end. If the sample does not break or tear, the soil is considered cohesive.
   d. A **pocket penetrometer**, **shearvane**, or **torvane** may also be used to determine the unconfined compression strength of soils

Source: (*OSHA Technical Manual*: *Excavations: Hazard Recognition in Trenching and Shoring,* Section V)

Types of Protective Systems

The following systems will be used to protect workers in trenches of four (4) feet or deeper.

All excavations shall utilize Protective Systems as indicated on plans and drawings, or as confirmed through the Engineering Manager. ALWAYS CONSULT PLANS AND DRAWINGS.

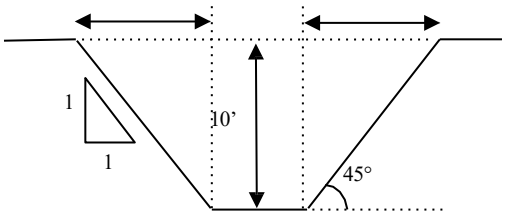
In the absence of plans, drawings, or confirmation from a member of engineering, all soil must be treated as "Type C" when considering sloping, shoring, shielding.

1. **Sloping**

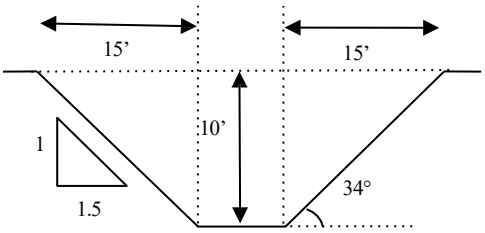
Maximum allowable slopes for excavations less than 20 feet deep based on soil type and angle to the horizontal are as follows:

Soil Type	Height/Depth Ratio	Slope Angle
Stable Rock	Vertical	90
Type A	0.75:1	53
Type B	1:1	45
Type C	1.5:1	34
*Type A	*0.5:1	*63
*Type A = Short Term Exposure (24 hrs. or less) - 12 ft. max. depth		

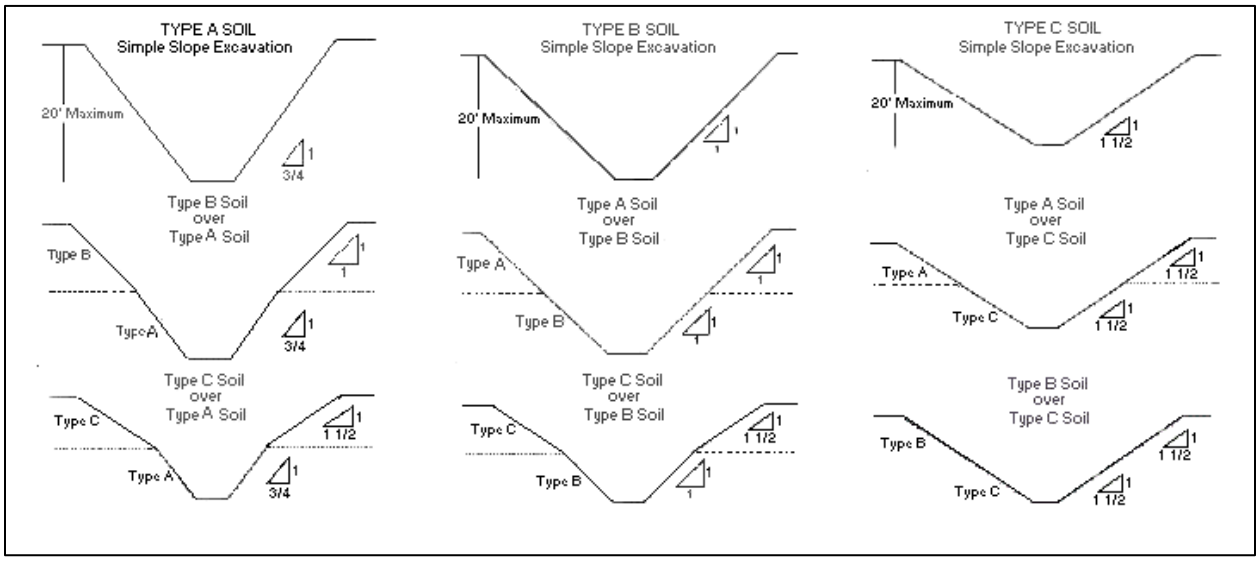
Example:



A 10' deep trench in Type B soil would have to be sloped to a 45 degree angle, or sloped 10 feet back in both directions. Total distance across a trench ten feet deep would be 20 feet plus the width of the trench.



In Type C soil, the trench would be sloped at a 34 degree angle or 15 feet in both directions for a total of 30 feet across plus the width of the trench.



(Slope Configurations: Simple and Layered)

Benching

There are two types of benching:

1. Single: One level or step, not exceeding 4 feet in height.
2. Multiple: More than one level or step, each not to exceed four feet in height.

Benching can be used in conjunction with simple sloping. Benches must be below the maximum allowable slope for that soil type.

For example: A ten-foot deep trench in Type B soil must be benched back 10 feet in each direction with the maximum of a 45 degree angle.

NOTE: **Benching is not permitted in Type C soil**

Shoring

Shoring is the provision of a support system for trench faces used to prevent movement of soil, underground utilities, roadways, and foundations. Shoring or shielding is used when the location or depth of the cut makes sloping back to the maximum allowable slope impractical.
Shoring systems consist of posts, wales, struts, and sheeting. There are two basic types of shoring, timber and metal hydraulic.

1. Hydraulic Shoring: Hydraulic shoring is a prefabricated strut and/or wale system manufactured of aluminum or steel. Hydraulic shoring provides a critical safety advantage over timber shoring because workers do not have to enter the trench to install or remove hydraulic shoring. Other advantages of most hydraulic systems are that they:
    a. Are light enough to be installed by one worker ,
    b. Are gauge-regulated to ensure even distribution of pressure along the trench line,
    c. Can have their trench faces "preloaded" to use the soil's natural cohesion to prevent movement,
    d. Can be adapted easily to various trench depths and widths.

2. Pneumatic Shoring: Works in a manner similar to hydraulic shoring. The primary difference is that pneumatic shoring uses air pressure in place of hydraulic pressure. A disadvantage to the use of pneumatic shoring is that an air compressor must be on site.

3. Screw Jacks: Screw jack systems differ from hydraulic and pneumatic systems in that the struts of a screw jack system must be adjusted manually. This creates a hazard because the worker is required to be in the trench in order to adjust the strut. In addition, uniform "preloading" cannot be achieved with screw jacks, and their weight creates handling difficulties.

4. Single-Cylinder Hydraulic Shores: Shores of this type are generally used in a water system, as an assist to timber shoring systems, and in shallow trenches where face stability is required.

5. Underpinning: This process involves stabilizing adjacent structures, foundations, and other intrusions that may have an impact on the excavation. As the term indicates, underpinning is a procedure in which the foundation is physically reinforced.

    Underpinning should be conducted only under the direction and with the approval of a registered professional engineer.

Shielding

Shielding is different from shoring in that instead of shoring up or, otherwise supporting the trench face; shields are intended primarily to protect workers from cave-ins.

Excavation to a depth of two (2) ft. below the shield's lower edge is permitted, but only if the shield is designed to resist the forces calculated for the full depth of the trench, and there are no indications while the trench is open soil will be lost from behind or below the bottom of the support system. Conditions of this type require observation on the effects of bulging,

1. Trench Boxes (Shields)
    a. Trench boxes shall be inspected for good condition before each use.
    b. The excavated area between the outside of the trench box and the face of the trench must be as small as possible.
    c. The space between the trench boxes and the excavation side will be backfilled to prevent lateral movement of the box.
    d. Shields shall not be subjected to loads exceeding those which the system was designed to withstand.
    e. Any modifications to the shields must be approved by the manufacturer.
    f. Workers must enter and leave the shield in a protected manner, such as by a ladder.
    g. Workers may not remain in the shield while it is being moved.

2. Combined Use
    a. Trench boxes are generally used in open areas, but they also may be used in combination with sloping and benching.
    b. The box should extend at least 18 in. above the surrounding area if there is sloping toward excavation. This can be accomplished by providing a benched area adjacent to the box.

More information on sloping and benching can be found in 29 CFR 1926 Subpart P - Appendix B: Slope Configurations (Figure B-1).

Source: *OSHA Technical Manual*: *Excavations: Hazard Recognition in Trenching and Shoring,* Section V

Policy / Procedure: **Explosives and Blasting**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company has provided the following procedures to ensure employees performing work at a location where blasting operations understand the hazards and precautions associated with blasting operations and remain safe from the risk of injury.

2.0 Responsibilities

- **Safety**, **Project Managers**, and **Supervisors** shall collaborate to identify if a project requires explosives or blasting services during the preconstruction planning process. That team will ensure retention of a qualified subcontractor to perform those operations.

- **All Employees** should be familiar with the general procedures of this policy.

3.0 General Procedures

- Edgerton does not self-perform any blasting operations, as defined by the applicable provisions of OSHA and/or the Bureau of Alcohol, Tobacco, and Firearms. Any blasting operations included within the company's approved scopes of work will be completed by a qualified subcontractor experienced in blasting operations.
- Prior to any blasting operations performed by a Company subcontractor, the subcontractor must provide to a Company Safety Representative a plan that outlines the procedures and precautions to ensure safe blasting operations.
- Only authorized and qualified subcontractors may handle and use explosives. Explosives and related materials will be stored in approved facilities following applicable provisions of BATF (the Bureau of Alcohol/Tobacco/Firearms).
- Smoking and open flames will not be permitted within 50 feet of explosives and detonator storage magazines. Procedures permitting safe and efficient loading will be established before loading is started.
- All Company employees performing operations at a location where a subcontractor is performing blasting operations must be informed of the procedures and precautions established for safe blasting operations, including the location of any blast zone, schedule of blasting operations, and basic evacuation and emergency response.

4.0 Recordkeeping

- All blasting plans, and other documentation related to those services, received by subcontractors will be retained in the relevant project file.

Policy / Procedure: **Fall Protection Policy**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

This Policy establishes guidelines to protect all employees exposed to fall hazards during work activities and operations, in accordance with applicable regulations, including but not limited to OSHA's Fall Protection Standard, 29 CFR 1926.500-503 (Subpart M).

2.0 Purpose/Scope

This policy applies to all Company employees engaged in work activities or operations that may expose them to fall hazards. The policy will provide guidelines to ensure planning to identify & properly mitigate or eliminate fall hazards so operations can be performed safely.

3.0 Definitions

- Anchor point: A secure point of attachment for lifelines, lanyards, or deceleration devices. An anchor point must be capable of supporting at least 5,000 pounds per person and must be independent of any anchorage being used to support or suspend platforms.
- Body Harness: Webbing/straps which are secured about an employee's body in a manner that will distribute the fall arrest forces over the thighs, pelvis, waist, chest, and shoulders. Having means for attaching it to other components of a personal fall arrest system, preferably at the shoulders and/or middle of the back.
- Competent person: A person capable of identifying existing and predictable hazards in the surroundings or working conditions, which are hazardous or dangerous to employees. A person who has the authorization to take prompt corrective action to eliminate such hazards.
- Connector: A device which is used to couple (connect) parts of the personal fall arrest system together.
- Deceleration Device: Any mechanism, such as a rope grab, rip-stitch lanyard, a specially woven lanyard, tearing or deforming lanyard, automatic self-retracting lifeline/lanyard, etc., which serves to dissipate a substantial amount of energy during a fall arrest.
- Deceleration Distance: The additional vertical distance a falling employee travels excluding lifeline elongation and free-fall distance, before stopping, from the point at which the deceleration device begins to operate. It is measured as the distance between the location of an employee's body harness attachment point at the moment of activation of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.
- Fall Hazard: Any location where an employee is exposed to a potential free fall.
- Free fall: The act of falling before a personal fall arrest system begins to apply force to arrest the fall.
- Free Fall Distance: The vertical displacement of the fall arrest attachment point on the employee's body harness between the onset of the fall and just before the system begins to apply force to arrest the fall. Free fall distance must not exceed 6 feet. This distance excludes deceleration distance and lifeline/lanyard elongation distance.

- Guardrail system: A barrier erected to prevent employees from falling to lower levels. This system includes a Toeboard, mid-rail, and top-rail able to withstand 200 pounds of force applied in any direction.

- Lanyard: A flexible line of rope or strap that has self-locking snap-hook connectors at each end for connecting to body harnesses, deceleration devices, and anchor points.

- Leading Edge: The edge of a floor, roof, or other walking/working surface, which changes location as additional floor, roof, etc., is placed or constructed. A leading edge is considered an unprotected side or edge when not under active construction.

- Lifeline: A component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline). This serves as a means for connecting other components of a personal fall arrest system to the anchorage.

- Personal Fall Arrest System (PFAS): A system used to arrest (catch) an employee in a fall from a working level. It consists of an anchorage location, connectors, a body harness, and may include a lanyard, deceleration device, lifeline, or any combination of these items.

- Qualified person: An individual, who by possession of a recognized degree, certificate, or professional standing or who has extensive knowledge, training, and experience, has successfully demonstrated his/her ability to solve or resolve problems relating to the subject matter work, or project.

- Rope Grab: A deceleration device, which travels on a lifeline and automatically, by friction, engages the lifeline and locks to arrest the fall of an employee.

- Snaphook: A connector comprised of a hook-shaped member with a closed keeper which may be opened to permit the hook to receive an object and when released, automatically closes to retain the object. Snaphooks must be self-closing with a self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection, thus preventing the opportunity for the object to "rollout" of the Snaphook.

- Toeboard: A low protective barrier that will prevent the fall of materials and equipment to lower levels, usually 4 inches or greater in height.

4.0 Responsibilities

- All Employees are responsible for the following:
  - Understanding and adhering to this Policy and any fall protection plan for the job.
  - Inspecting, caring for, wearing, using, and maintaining any personal fall protection or arrest equipment.
  - Notifying their supervisor when fall protection or arrest equipment is damaged or not suitable for use based on inspection.
  - Understanding the Fall Hazards associated with their work and the fall protection methods they are using.
  - Notifying their supervisors of new Fall Hazards that were not planned for or are discovered during operations.

- Project Managers and Safety Personnel are responsible for understanding and implementing this Policy and participating in planning for all projects to identify Fall Hazards so an appropriate fall protection plan can be implemented when necessary.

- Supervisors are responsible for understanding this Policy and implementing any fall protection plan created for their projects. They are also responsible for identifying and mitigating or eliminating Fall Hazards discovered at their project sites.

5.0 General Procedures

- **Pre-Project Planning:** Fall Hazards associated with the Company's scope of work should be identified on a per project basis during pre-project planning, including during completion of a Pre-Project Checklist and Hazard Assessment. All Fall Hazards identified within the Company's scope of work for a project should be mitigated or eliminated through implementation of a fall protection method to ensure safe operations.

- **Fall Protection Equipment:** All fall protection equipment utilized by Company employees must meet the requirements of applicable ANSI, ASTM, or OSHA requirements.

- **Safe Work Requirements:**
  - Employees are required to follow the 100% fall protection policy to ensure that they are protected from Fall Hazards.
  - Employees cannot use items such as boxes, buckets, chairs, etc. to increase their height level to conduct a work task.
  - All employees are to wear a Personal Fall arrest System when ascending or descending at any height, or onto any equipment or structure where a guardrail system is not in place and a Fall Hazard exists.
    - This requirement does not apply when entering or exiting equipment.
    - This requirement does not apply to individuals performing operations near an open excavation or trench. Any person operating near an open excavation or trench must take extreme caution when performing operations.
  - A Personal Fall Arrest System is not required when there is other appropriate fall protection methods or when a Fall Hazard does not exist
  - Employees must maintain 3 points of contact when using ladders.
  - Employees working from, traveling on, and using mobile work platforms are required to be tied off when in the basket or on the platform.

- **Same Level Fall Protection:**
  - Employees are to keep work areas organized to maintain good housekeeping to prevent falls on the same level.
  - Equipment and materials are to be removed from walkways to keep them clear.
  - Floor holes and openings created by Company employees shall be guarded by a guardrail system and/or covered to remove fall and tripping hazards.
    - Floor holes and openings created by other contractors in our immediate work area shall be guarded by a guardrail system and/or covered to remove fall and tripping hazards prior to the commencement of work activities.
    - Hole covers must be capable of supporting at least twice the maximum load that may be imposed on them.
    - Covers must be secured and marked "HOLE" or "COVER".

- **Fall Protection Methods:** one of the following fall protection methods must be utilized when employees are exposed to a Fall Hazards. (These requirements do not apply to individuals performing operations near an open excavation or trench. Any person operating near an open excavation or trench must take extreme caution when performing operations.)
  - Engineering Controls: Engineering Controls should be utilized whenever possible to either isolate employees from a fall hazard or eliminate the hazard entirely.

- Guardrail Systems: Guardrail Systems may be utilized to protect employees from Fall Hazards, including open excavations, pits, trenches, and Leading Edges, but must meet the following requirements:
  - Designed and installed in accordance with applicable safety regulations, including OSHA.
  - Made from wood, steel, chains, or wire rope, capable of withstanding a force of at least 200 pounds, and be flagged at 6ft intervals. Vertical members cannot be placed more than 19 inches apart.
  - Be at least one-quarter inch in nominal diameter or thickness.
  - Have a top rail that is installed 39-45 inches from the working level.
  - Have a mid-rail installed if a parapet wall is not present.
  - Toeboards should be installed when employees are exposed to falling object hazards.

- Personal Fall Arrest System (PFAS): PFAS must be used when using aerial lifts or aerial working platforms; when exposed to a fall hazard and there is no Guardrail System installed; or when reaching or extending outside a or above a guardrail system
  - Personal fall protection systems are to be used to either prevent a fall (fall restraint), or if a fall does occur, bring an employee to a complete stop (fall arrest) within a deceleration distance of 42 inches, excluding lifeline elongation. This distance is in addition to the maximum Free Fall Distance of six feet.
  - When fall protection systems are used by employees, they will be used to prevent falls, whenever possible.
  - Each employee who will wear personal fall arrest equipment must inspect it before each use. Any deteriorated, bent, damaged, or impacted harness showing excessive wear must be reported and removed from service.
  - The components of a personal fall protection system are to have a minimum breaking strength of 5,000 pounds.
  - Personal fall arrest systems are to limit the maximum arresting force on an employee to 1,800 pounds when used to stop a fall.
  - A personal fall arrest system is to consist of a body harness, connecting means between the harness and an anchorage or anchorage connector, such as a lanyard, fall arrester, vertical or horizontal lifeline, self-retracting lanyard, or a suitable combination of these.
    1. Body Harness
       - The body harness is to be a nylon or web belt system designed to spread the shock and load of a fall over the shoulders, thighs, and seat area.
       - When using the body harness for arrest or restraint, the lanyard or line is to be attached to the D-ring positioned on the upper back straps.
    2. Lanyards
       - Lanyards utilized by employees are to have a maximum of 6 ft. fixed length and incorporate a shock absorber.
       - Only double-legged lanyards are to be utilized when using a shock absorbing lanyard.
       - Must be equipped with a scaffold hook (also called a pelican hook or similar) with a side load rated gate.
       - Lanyards are not to be utilized unless the fall distance is 18.5' or greater.
       - Lanyards cannot be connected to increase the lanyard length.
       - Do not extend the lanyard length to exceed the fall distance.
       - Do not tie knots in the lanyard to reduce its length. The lanyard's capacity will become significantly reduced.

3. Fall Limiters (Self-retracting lanyards and Retractable lanyards)
    - Fall limiters (self-retracting lanyards and retractable lanyards) are to be directly connected to the employee's harness.
    - When using a fall limiter, the maximum length is to be 9 ft. and be rated for a maximum arrest force of 900 lbs. with a 310 lbs. user maximum arrest distance of 54 inches.
    - Fall limiter must meet ANSI Z359.14 Class B and have an average arrest distance of 30 inches.
    - Self-Retracting Lanyards are to be attached directly to an overhead anchorage point that can support a 5,000-pound load or be part of an engineered fall arrest system.
    - Self-Retracting Lanyards can be utilized at all fall distance heights.
    - Do not extend the lanyard length to exceed a 15-degree angle from the anchorage point. An angle greater than 15 degrees can increase your potential of creating a pendulum effect in the event of a fall.
    - Do not use the retractable lanyard as a positioning or fall restraint device.
    - Use softeners to protect from sharp edges, when applicable.
4. Lifeline Systems:
    - All lifelines shall be:
        - designed, installed, and used under the supervision of a Qualified Person or registered engineer.
        - Inspected by a Competent Person prior to each use.
        - Used in accordance with the manufacturer's instructions and per the engineer's design, when applicable.
        - Protected against being cut or abraded. Softeners or similar are to be used.
    - Vertical Lifelines
        - Must have a minimum breaking strength of at least 5,000 pounds.
        - Only one employee can be attached per line.
        - A rope grab is to be used to secure the employee's lanyard to the vertical lifeline.
        - Do not extend the length of the vertical lifeline to exceed a 15-degree angle from the anchorage point. An angle greater than 15 degrees can increase your potential of creating a pendulum effect in the event of a fall.
        - Ensure the line cannot become caught on something.
    - Horizontal Lifelines
        - Are to be either a commercially available pre-engineered system from an approved supplier or as part of a complete personal fall arrest system which maintains a safety factor of at least two.
        - Employees are not to exceed the maximum number of personnel allowed on the system based on what the system was designed for.
5. Anchorage:
    - An anchorage point is the location on a structure to which a lifeline, lanyard, fall limiter, or self- retracting lanyard is securely attached.
    - The anchorage point is to support a 5,000-pound load or be part of an engineered fall arrest system.
    - Anchorage points are to be evaluated and inspected prior to use.
    - One employee is to be secured per anchorage point.

- The employee is to secure their fall protection to an anchorage point preferably above the head or shoulders, whenever feasible.
- Permanent anchorage points are to be used, whenever possible and feasible.

- **Inspection of Fall Protection Equipment**: the following criteria must be utilized to maintain all fall protection equipment in good working condition:
  - Body Harness
    - Inspect before each use, including the following:
      - Closely examine all nylon webbing to ensure there are no burn marks, which could weaken the material.
      - Verify there are no torn, frayed or broken fibers, pulled stitches, or frayed edges anywhere on the harness.
      - Examine the D-ring for excessive wear, pits, deterioration, or cracks.
      - Verify that buckles are not deformed, cracked, and operate correctly.
      - Check to see that each grommet (if present) is secure and not deformed from abuse or a fall.
      - The harness should never have additional punched holes.
      - All rivets should be tight and not deformed.
      - Check tongue/straps for excessive wear from repeated buckling.
    - A trained and qualified person will complete an annual inspection of all lanyards and documentation will be maintained.
  - Lanyards
    - Inspect before each use, including the following:
      - Check lanyard material for cuts, burns, abrasions, kinks, knots, broken stitches, and excessive wear.
      - Inspect the Snaphooks for distortions in the hook, locks, and eye.
      - Check carabiner for excessive wear, distortion, and lock operation.
      - Ensure that all locking mechanisms seat and lock properly.
      - Once locked, the locking mechanism should prevent hook from opening.
      - Visually inspect shock absorber for any signs of damage, paying close attention to where the shock absorber attaches to the lanyard.
      - Verify that points where the lanyard attaches to the Snaphooks are free of defects.
    - A trained and qualified person will complete an annual inspection of all lanyards and documentation will be maintained.
  - Snaphooks
    - Inspect before each use.
      - Inspect Snaphooks for any hook and eye distortion.
      - Verify there are no cracks or pitted surfaces.
      - The keeper latch should not be bent, distorted, or obstructed.
      - Verify that the keeper spring securely closes the keeper latch.
      - Test the locking mechanism to verify that the keeper latch locks properly.
  - Self-retracting lanyards/lifelines
    - Inspect before each use.
      - Visually inspect the body to ensure there is no physical damage to the body.
      - Make sure all nuts and rivets are tight.
      - Make sure the entire length of the nylon strap/wire rope is free from any cuts, burns, abrasions, kinks, knots, broken stitches/strands, excessive wear and retracts freely.
      - Test the unit by pulling sharply on the lanyard/lifeline to verify that the locking mechanism is operating correctly.

        - If the manufacturer requires, the retractable lanyard will be returned to the manufacturer for scheduled annual inspections, by the Safety Manager.
    - Tie-off adapters/anchorages
        - Inspect for integrity and attachment to solid surface.
    - Horizontal lifelines
        - Inspect for structural integrity of line and anchors.
    - Important information for all fall protection equipment including, but is not limited to, body harnesses, lanyards and lifelines of any type, D-rings, Snaphooks, anchorages, and tie-off adaptors:
        - The user of the fall protection equipment will perform a daily inspection of personal fall protection.
        - A trained and qualified person will complete an annual inspection of all horizontal lifelines and documentation will be maintained.
        - Any fall protection equipment that is involved in a fall will be turned into the Safety Department and may not be used again.
    - Guardrails
        - Guardrail components should be inspected prior to use to ensure they are free from defects. Routine visual inspections should be conducted.

- **Storage and Maintenance of Fall Protection Equipment**
    - Never store personal fall protection equipment in the bottom of a toolbox, on the ground, or outdoors exposed to the elements (rain, snow, ice, etc.).
        - Hang equipment in a cool, dry location in a manner that retains its shape.
        - Always follow manufacturer recommendations for inspections.
        - Never store equipment near excessive heat, chemicals, moisture, or sunlight.
        - Never store in an area with exposures to fumes or corrosive elements.
        - Avoid dirt or other types of build-up on equipment.
        - Never use this equipment for any purpose other than personal fall arrest.

6.0 Training

- All training will be documented with an attendance list.
- All employees engaged in fall protection will have the knowledge to:
    1. Recognize fall hazards on their job site.
    2. Understand the hazards associated with working near fall hazards.
    3. Work safely in hazardous areas by utilizing appropriate fall protection measures.
    4. Understand and follow all components of this fall protection program.
    5. Identify and understand the enforceable OSHA Standards and ANSI Standards that pertain to fall protection.
    6. Re-training shall be provided when the following are noted:
        - Deficiencies in training.
        - Workplace changes.
        - Fall protection systems or equipment changes that render previous training obsolete.

7.0 Recordkeeping

- All training records will be maintained by the Safety Department.

8.0 Related Documents

- Safe Work Planning policy
- Stop Work Authority policy

EDGERTON

Policy / Procedure: **Flammable and Combustible Liquids**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Employees using, handling, or transporting flammable or combustible liquids shall follow the following guidelines to ensure their safety and the safety of others, and prevent related incidents or injuries.

2.0 Purpose/Scope

This Policy applies to all Company locations that store flammable or combustible liquids and to all Company employees who use, handle, or transport the same as part of their scopes of work.

3.0 Responsibilities

- **Project Managers** and **Supervisors** are responsible for implementing and enforcing this policy.
- **Safety Representatives** are responsible for monitoring compliance with this policy.
- **All Employees** who work with, handle, or transport flammable or combustible liquids are responsible for understanding and following this policy.

4.0 General Procedures

- Only experienced and properly trained personnel, using the proper Personal Protective Equipment, shall handle or transport flammable liquids or combustible liquids.
    - PPE shall be determined based on the specific task performed. Employees using or handling flammable or combustible liquids should wear, if needed, safety goggles / face shields, chemical resistant gloves, and flame-resistant clothing. Actual PPE needed will depend on task.
- Only approved containers and portable tanks will be used for storing and handling flammable and combustible liquids. No more than 25 gallons of flammable or combustible liquids will be stored in a room outside of an approved storage cabinet.
- No more than three (3) storage cabinets may be located in a single storage area. Inside storage rooms for flammable and combustible liquids will consist of fire-resistive construction, having self-closing fire doors at all openings, 4-inch sills or depressed floors, a ventilation system that provides at least six (6) air changes per hour, and electrical wiring and equipment approved for Class I, Division 1, locations.
- Storage in containers outside buildings will not exceed 1,100 gallons in any single pile or area. Storage areas will be graded to divert possible spills away from buildings or other exposures or will be surrounded by a curb or dike. Storage areas will be located at least 20 feet from any building and will be free from weeds, debris, and other combustible materials.
- Flammable liquids will be kept in closed containers when not actually in use. Conspicuous and legible signs prohibiting smoking in the area will be posted.
- Any area where flammable or combustible liquids are stored shall be well ventilated. NO SMOKING or FLAMMABLE GAS (or similar) signate shall be in the area where they are stored.
- Portable fire extinguishers (Class B) shall be available at any location that stores flammable liquids or combustible liquids.
- All employees should follow general safety rules during fueling operations involving flammable or combustible liquids such as gasoline, diesel, or other petroleum products, including but not limited to:
    - Turning the vehicle or equipment off during all fueling operations.

- Do not use any electronic equipment during fueling operations.
- Conducting a walkaround inspection of the vehicle or equipment following fueling operations but before leaving the fueling station.
- When filling portable containers with fuel, ensure that the container is approved for that use, place the container on the ground away from ignition sources, and fuel slowly. Cell phone or other electronics use is prohibited.

5.0 Training

- All Employees utilizing or handling flammable or combustible liquids shall understand and be trained in this policy.

6.0 Related Documents

- Fire Prevention and Protection policy
- Spill Control Program

Policy / Procedure: **Fire Prevention and Protection**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Company employees exposed to fire hazards are required to follow these general procedures and guidelines to ensure fire prevention and protection are utilized to reduce or eliminate fire hazard risks in the workplace.

2.0 Purpose/Scope

This Policy provides guidance to so employees can identify and control fire hazards with their work and provides the requirements and guidelines to eliminate or reduce risks of fire hazards.

3.0 Responsibilities

- **Safety** is responsible for seeing that fire prevention procedures are enforced; fire-suppression systems are inspected regularly and maintained; supervisors are trained to use fire extinguishers for incipient fires; and employees are trained to use evacuation routes and procedures.

- **Supervisors** are responsible for monitoring the use of flammable material; training employees in safe storage, use, and handling of flammables; and ensuring that storage areas for flammables are maintained properly.

- **All Employees** are responsible for understanding and complying with this Policy and all jobsite procedures for the safe storage, use, and handling of flammable materials, and reporting violations of this written program.

  All Employees are also responsible for exercising Stop Work Authority when confronted with unsafe conditions concerning fire hazards, no matter how minor.

4.0 General Procedures

- **General Fire Prevention Rules:**
  - Safe work planning must always include the identification of fire hazards. A prework walkthrough of the work area should be performed to identify and mitigate or eliminate any potential fire hazards.
  - Any Hot Work must be planned and performed in compliance with the Company's Hot Work policy.
    - All Hot Work operations must have a capable "fire watch" assigned to the area to monitor for and prevent fires.
  - All engines must be turned off before fueling. Ensure that fueling is done in a safe manner away from sources of ignition and keep exhaust discharge away from flammable liquids.
  - Eliminate all non-essential ignition sources where flammable materials are used or stored. For example:
    - Keep sources of open flame (such as welding and cutting torches, matches, lighters, and heaters) away from operations involving flammable materials.
    - Do not cut or weld equipment containing flammable liquids unless the equipment has been emptied and purged with a neutral gas, such as nitrogen.
    - Prohibit chemical ignition sources in areas where flammable materials are stored or handled.
    - Use only non-sparking tools in areas where flammables are stored or handled.

        - Eliminate the possibility of static sparks in flammable storage or handling areas.
    - Store materials, such as oxidizers and organic peroxides, which produce large amounts of oxygen when they decompose, in an area separate from flammable materials.
    - All employees performing Hot Work or who are routinely exposed to fire hazards should have a general understanding of the fire classification system. Fires are classified according to the type of fuel or material that is burning or could burn:
        - Class A – wood, paper, and cloth
        - Class B – flammable gases, liquids, and greases
        - Class C – fires in live electrical equipment, or involving materials near electrically-powered equipment
        - Class D – combustible metals, such as magnesium, zirconium, potassium, and sodium

- **Fire Extinguishers and Fire Fighting Equipment:**
    - The Company provides portable fire extinguishers for employee use and has selected and distributed the fire extinguishers based on the classes of anticipated workplace fires and on the size and degree of hazard which would affect their use.
    - Fire extinguishers, rated not less than 2A, will be provided for each 3,000 square feet of building area, or major fraction thereof. Travel distance from any point to the nearest fire extinguisher should not exceed 100 feet.
    - Portable fire extinguishers must be maintained in a fully charged and operable condition and always kept in their designated places when they are not being used.
    - All construction equipment shall be equipped with a suitable fire extinguisher. It is recommended that a 20 lbs. or larger, multipurpose extinguisher be mounted in equipment but smaller units can be used if space is unavailable.
    - Fire extinguishers are to be used on a voluntary basis and are intended to be used to extinguish small fires and to control the spread of fire.
        - Fire extinguishers are not intended for fighting major fires.
        - Only employees who have been trained in their proper use are permitted to use fire extinguishers.
    - Firefighting equipment is for emergency responder use only.
    - Keep firefighting equipment in its proper place where it is clearly visible & easily accessible and use it only in case of fire or authorized fire drills. When working in an area, familiarize yourself with the location of fire extinguishers, emergency blankets, and fire hydrants.
        - Extinguishers should be located where they can be easily seen. In cases where this is not practical, signs need to identify the location of the extinguisher.
        - Keep trash and stored material away from extinguishers to prevent blockage of access to the extinguisher.
    - Supervisors shall be notified anytime an employee utilizes any extinguisher, so that the extinguisher can be refilled and recharged.

- **Fire Extinguisher Inspection and Testing:**
    - Monthly Inspections: All fire extinguishers are to be visually inspected at least once each month by a representative of Safety, Supervisor, Superintendent, or Project Manager. The inspection is to include:
        - Proper location
        - Fully charged
        - Seal wire not broken
        - Free of any obvious defects or damage
        - Dry Chemical extinguishers should be inverted to prevent settling of the powder.

      All inspections shall be documented, recording the date, number, location and condition of the extinguishers and who completed the inspection.
    - Annual Inspections: A thorough examination of each extinguisher is to be conducted annually by an individual who is trained to examine, repair, and recharge extinguishers. An

inspection tag is to be attached to each extinguisher showing the date of the annual examination, the date of recharge, and the initials of the individual making the examination. A record of all annual inspections shall be documented and filed for each location.

- Hydrostatic Tests: Extinguishers more than five years old may need a hydrostatic test if they are to remain in service. Contact a local service provider to determine individual requirements.
  - **NOTE** – Extinguishers removed from their locations to be recharged must be replaced by spare extinguishers during the period they are gone.

- **Temporary Heating Devices:**
  - Temporary heating devices shall be installed to provide clearance to combustible material not less than 12 inches on all sides for circulating type room heaters and not less than 36 inches on all sides for radiant type heaters.
  - Sufficient ventilation should be provided when heaters are used in confined spaces, to ensure proper combustion, temperature, and the health and safety of workers.
  - Solid fuel salamanders are prohibited in buildings and on scaffolds.

- **Emergency exits:**
  - Every exit must be clearly visible, or the path to it conspicuously identified in such a manner that every occupant of the building will know the best way to get out of the building in a fire or other emergency.
  - Exits must never be obstructed.
  - If it is not readily identifiable whether an internal door is an exit, the door or passageway that is not an exit or path of exit should be labeled as "NOT AN EXIT" or with similar language. All exit signs must either be self-illuminating or illuminated by a reliable external light source.

- **Fire emergency procedures:**
  - The person who discovers a fire should activate the nearest alarm and notify his/her supervisor along with all other building occupants.
  - An employee should only fight a fire that is small and confined to its point of origin, proper firefighting equipment or extinguisher is readily available and the employee is trained to use the equipment, and if there is escape route available such that the fire can be fought with the employee's back to the exit.
  - Employees are to leave their work area in the event a fire alarm is sounded. All windows and doors should be closed (if applicable), and any gas jets turned off. Evacuate any buildings and move away from those buildings. Assemble in a designated area. Remain in the designated area until a competent authority says it is safe to re-enter the work area or building.

- **Emergency Plan for people with disabilities:**
  - First line supervisors are responsible for assisting people with disabilities under their supervision and must choose an alternate to assume responsibility in the supervisor's absence.
  - The supervisor, alternate, and the worker with the disability will be trained on available escape routes. Persons with disabilities will be assisted in the same manner as employees.

- **Fire Safety Inspections and Housekeeping:**
  - Safety and Supervisors are responsible for work site inspections to ensure compliance with this written program.
  - These inspections should address housekeeping issues, proper storage of chemicals, access to fire extinguishers, and emergency evacuation routes.
  - Inspections under this section can be part of any routine, frequent, or other jobsite safety audit or inspection or as part of a Daily Plan and Job Hazard Analysis.

5.0 Training

- Fire protection and extinguisher training is provided to all new hires at the time of orientation with refresher training provided annually.

6.0 Recordkeeping

- Training records will be maintained by the Safety Department.
- All inspection documents will be maintained by Safety.
- Fire extinguisher tags will be maintained on the applicable equipment.

7.0 Related Documents

- Hot Work policy

Policy / Procedure: **Hand and Power Tools**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company provides the following guidelines to ensure all employees are properly trained in and understand the safe use of hand and power tools and machinery, and that hand and power tool use complies with applicable regulations.

2.0 Purpose/Scope

This Policy applies to all employees who perform operations requiring the use of any hand and power tools or machinery covered by this Policy. The Policy is to ensure employees are knowledgeable in recognizing the hazards associated with the operation of hand and power tools and machinery, and to establish safe work practices.

3.0 Definitions

- Guard: a barrier that prevents the entry of the operator's hands or fingers, or other body parts, into the point of operation.
- Personal Protective Equipment (PPE): equipment, accessories, and some specialized clothing designed to create a barrier, shield, or isolate individuals from workplace hazards.
- Point of Operation: the area on a machine where work is performed on the material.

4.0 Responsibilities

- All **Employees** are responsible for the following:
  - assuring they use the proper tool for their assigned tasks
  - understanding the proper and safe use of their tools
  - inspecting all tools before use to identify any damage or defects
  - only using tools they are trained and authorized to use
  - never using improper or unsafe tools or tools with missing, removed, or bypassed guards or safety devices
- **Supervisors**, in collaboration with **Safety Personnel,** are responsible for the following:
  - ensuring the availability of all tools necessary to execute planned work
  - ensure that tools are inspected and in safe condition with all manufacturers' required guards and safety devices in place prior to use
  - ensuring that employees are trained in the safe and proper use of tools, and that only authorized employees use hand and power tools
  - Ensuring that all damaged, broken, or unsafe tools are tagged out, isolated, or otherwise removed from operation.

5.0 General Procedures

- **Standard Practices:**
  - All hand and power tools must be maintained in a safe condition and inspected prior to use.
  - Tools that are unsafe, defective, or noncompliant with this policy are not to be used at any time and must be tagged as "Do Not Use" or with similar warnings.
  - Non-sparking tools are to be used to provide protection against fires and explosions in en-

vironments where there is a concern about sparks igniting flammable solvents, vapors, liquids, dusts, or residues.
- Tools without appropriate guarding must not be used until guarding is replaced.
- Employees are not to operate any tool they have not been trained and authorized to operate.
- Employees must wear all PPE required for safe operations of the tool being utilized, considering the conditions and requirements of the work location, the materials involved, the tool being used, and the hazards associated with the task. All PPE must meet the requirements of the Personal Protective Equipment policy.
- Use the correct tool for the job. Tools are to be used only for their intended purpose.
- Tools are not to be modified unless approved by the manufacturer.
- Always ensure and maintain footing, body positioning, and balance when using hand and power tools.
- Never force a tool. Guide the tool and allow the tool to do the work. Forcing the tool may cause it to bind or "kick back," allowing for additional hazards and/or injury to the user or other workers in the area.
- Never throw or drop tools, including from one level to another.
- Do not use/operate a tool near another person that is in the line of fire.

- **Hand Tools:**
  - Maintain hand tools in sharp, clean, and proper working order.
  - Wrenches are not to be used when jaws or sockets are sprung or damaged to where slippage occurs.
  - Hammers and impact tools are to be kept free of mushroom heads.
  - Wood handles are to be kept free of splinters and/or cracks. The handle is to be tightly secured to the head.
  - Fiberglass handles are to be free of cracks, deformations, and/or discoloration.
  - Insulated handles are to be pliable with no signs of tears, cuts, cracks, or dry rot.
  - Tools are not to be used as a pry bar.
  - Utility knives are to be a self-retracting safety knife.
  - When cutting an object, place the object to be cut on a flat surface, whenever possible and cut away from your body. ANSI approved cut resistant gloves should be used when using cutting tools.

- **Power Tools:**
  - Electric power operated tools are to be approved double insulated, properly grounded, and/or used with a GFCI.
  - Tool triggers are to require continuous pressure to operate the tool. Power tools are not to be equipped with locking triggers.
  - Never carry a tool by the cord and always disconnect from the receptacle by the plug and not the cord.
  - Always protect cords from damage such as: heat, water, oil, chemicals, and sharp edges.
  - Maintain cord placement so that it cannot become a tripping hazard. Pay special attention to aisles, stairs, ladders, and access points.
  - To avoid accidental starting of power tools, employees are not to hold their finger on the switch button while carrying or positioning the tool.
  - Hand held power tools with wheels less than two inches in diameter may be equipped with only a positive on/off control.
  - Hand held power tools with wheels greater than two inches in diameter are to be equipped with a momentary contact on/off control and may have a lock on the control provided that the turnoff can be accomplished by a single motion of the same finger, or fingers, that turn it on.
  - Tools, such as circular saws, without positive accessory means, are to be equipped with a constant pressure switch that will shut off the power when the pressure is released.
  - Tools are not to be left unattended while parts are still in motion.
  - Disconnect the tool when changing accessories or when the tool is not being used.

- Always wear the proper clothing. Loose clothing, ties, jewelry, can get caught in moving parts. Long hair should be secured or tied back.

- **Powder Actuated Tools:**
  - Only trained and authorized personnel will be allowed to use powder actuated tools. Operator should carry on his or her possession a current qualification card for use of powder actuated tools.
  - Powder-actuated tools are not to be used in an explosive or flammable atmosphere.
  - Inspect the tool to determine if it is clean, that all moving parts operate freely, and that the barrel is free from obstructions.
  - The muzzle end of the tool is to have a protective shield or guard centered perpendicularly on the barrel to confine any flying fragments or particles that might otherwise create a hazard when the tool is fired. Never point the tool at anybody.
  - The tool is to be loaded only immediately prior to its use. A loaded tool is not to be left unattended.
  - Keep hands clear of the barrel end.
  - If a powder-actuated tool were to misfire, the employee is to wait at least 30 seconds, then try firing it again. If it still will not fire, the user is to wait another 30 seconds so that the faulty cartridge is less likely to explode, then carefully remove the load. The bad cartridge is to be placed in water.
  - Powder-actuated tools are to be designed for varying powder charges so that the user can select a powder level necessary to do the work without excessive force.
  - If the tool develops a defect during use, stop use and tag it out of service until it is properly repaired.
  - Always follow manufacturers' recommendations and applicable local laws governing the proper use, inspection, and maintenance.
  - The explosive powder actuated tool and ammunition must be always kept in a secured location (other than when being used) to prevent unauthorized use. The storage container must be labeled with the words, "WARNING: Powder actuated tool to be used only by a qualified operator and kept locked when not in use" or other similar language.
  - Storage of the tool, ammunition, and studs shall be controlled so that only AUTHORIZED personnel can withdraw them for use.
  - The powder actuated tool box must contain the tool, operator's instructions, service manual, load and fastener charts, inspection records, service tools and accessories.

- **Machine Guarding:**
  - The point of operation of a machine that exposes an employee to potential injury is to be guarded as required by manufacturer. Examples can include, but are not limited to belts, shears, grinders, power saws, table and radial saws, shafts, pulleys, power press, fly wheels, chains, fans, jointers, portable tools.
  - When power operated tools are designed to accommodate guards, the tool is to be equipped with the guard.
  - A person must not intentionally remove, impair, or render ineffective any safeguard provided for the protection of workers.
  - A fixed guard must not be modified to be readily removable without the use of tools.
  - Portable power-driven saws and hand-held grinders having a blade diameter greater than 2 inches, is to be equipped with guards above and below the base plate or shoe.

- **Abrasive Grinding:**
  - For pedestal and bench grinders, the side guards must cover the spindle, nut and flange and 75% of the wheel diameter.
  - For pedestal and bench grinders, the work rest must be used and kept adjusted to within 1/8-inch (0.3175cm) of the wheel.
  - For pedestal and bench grinders, the adjustable tongue guard on the top side of the grinder must be used and kept to within 1/4-inch (0.6350cm) of the wheel.

- All pedestal and bench grinders must be permanently attached to the floor or workbench.
- Face shields and safety glasses must be worn when operating a pedestal or bench grinder.
- Hand held grinders with a grinding wheel greater than 1 inch is to have the guard in place and secured against movement during operation.
- Both, circular saws and hand-held grinders are to have a constant pressure or "deadman" switch that turns off the equipment when released.
- A ring test is to be given to all new grinding wheels before they are put into service. To conduct such a test, suspend the wheel from its hole by a rod, and tap the wheel 45 degrees off the center line, 1" to 2" from the outside of the wheel. A wheel in good condition will give off a clear metallic "ping" when tapped. Wheels that do not give off a clear tone should be returned to the vendor.
- Machines designed for a fixed location are to be anchored to prevent walking or moving. (Examples include drill presses, band saws, etc.).

- **Cut-Off and Chop Saws:**
  - Abrasive saw shall be equipped with a guard covering at least 180 degrees of the blade (portable units).
  - Persons operating abrasive cut-off saws shall be required to wear safety glasses or goggles and a full- face shield.
  - All portable cut-off saws shall be equipped with a constant pressure or "dead man" switch.

- **Fuel Powered Tools:**
  - Fuel operated equipment is to be stopped and cooled off before refueling, servicing and/or maintenance is conducted.
  - During refueling operations containment and spill pads should be used in a manner that minimizes spills/leaks to decrease/lessen environmental impact.
  - Fuel is to be stored, handled, and transported in approved safety cans.
  - When fuel powered tools are used in enclosed spaces, employees are to also follow the Confined Space policy.

- **Pneumatic Tools (Compressed Air Operated):**
  - Pneumatic power tools are to be secured to the hose or whip by some positive means to prevent the tool from accidentally disconnecting.
  - Safety clips, wire, hand-cuffs, or other retainers are to be securely installed and maintained in pneumatic impact tools to prevent the attachment from being accidentally expelled.
  - Airless spray guns of the type which atomize paints and fluids at high pressures (1,000 psi or more) are to be equipped with automatic or visible manual safety devices.
  - Pressure rating for air hoses and hose connections are not to be exceeded.
  - Keep air hoses away from aisles and stairs. If possible, run hoses overhead, or out of walkways, to protect from physical damage, and avoid tripping hazards.
  - Air pressure is to be turned off and bled before disconnecting power tools, unless equipped with a quick disconnect.
  - When changing accessories on a pneumatic tool, shut the pressure off and bleed the line or disconnect the power tool from the air source and bleed the line.
  - Where fasteners are used, a muzzle actuation guard is to be in place.
  - Compressed air for cleaning is to be limited to less than 30 psi.
  - Tools that are designed to accommodate guards are to have the guards in place and in proper working order during use.

- **Jacks, including Hydraulic Powered Jacks:**
  - Jacks are to be maintained, inspected and operated in accordance to the manufacturer's recommendations.
  - Jacks are to be equipped with a device that prevents them from rising up too high.
  - Jacks are to be identified and be marked with their load capacity. This load capacity is

not to be exceeded.
- Jacks are not meant to support a load. Once the load has been lifted, blocks are to be used.
- The fluid used in hydraulics-powered tools is to be fire resistant fluid approved under schedule 30 of the United States Bureau of Mines.
- Fluids in hydraulic powered jacks are to retain their operating characteristics at the most extreme temperatures to which they will be exposed.
- Do not exceed the manufacturer's safe operating pressure for hoses, valves, pipes, filters, and other fitting for hydraulic-powered jacks.

- **Personal Protective Equipment:**
  - Employees are to wear the applicable Personal Protective Equipment to help protect the employee from the hazards associated with the use of the tool or machine. Gloves, loose fitting sleeves, and jewelry are not to be worn when operating rotating equipment.

- **Inspections:**
  - Machines/tools are to be inspected regularly and before each use to help ensure the machine/ tool and associated guards are in place and are not damaged.

6.0 Training

- Operators of tools or machines are not allowed to operate a machine without being familiar with the installation, operation, and adjustment of installed guards. Training is to be provided to help ensure that the employee understands the purpose and function of the guarding program. Training may include:
  - A description and identification of the hazards associated with each machine.
  - The specific safeguard, how it provides protection, and the hazards it is intended to block.
  - How to install, operate, and adjust the guards.
  - What to do if the guard is damaged.
  - The personal protective equipment that is to be used to protect against hazards associated with the machine and/or equipment.

7.0 Recordkeeping

- Employee training records will be maintained by the Safety Department.

8.0 Related Documents

- Electrical policy
- Personal Protective Equipment policy

Policy / Procedure: **Hazardous Communication (HAZCOM)**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

Edgerton is committed to the prevention of hazardous chemical exposures that may result in injury or illness. The Company will comply will applicable federal and state laws pertaining to chemical hazard communication and provide its employees with information about hazardous chemicals on the worksite through this hazard communication program.

2.0 Purpose/Scope

The purpose of this program is to set forth policies and procedures concerning Hazard Communications which will enhance the safety and well-being of all employees. Furthermore, execution of this program is designed to provide compliance with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard.

3.0 Definitions

- Safety Data Sheet (SDS) or Material Safety Data Sheet (MSDS): is a mandatory, standardized document provided by manufacturers, importers, or distributors that details the properties, potential health or physical hazards, and safety precautions for handling, storing, and transporting hazardous chemicals.

4.0 Responsibilities

- The **Safety Director,** and other designated **Safety** personnel, will assume duties as Hazard Communication Officer. This position carries the responsibility of ensuring this program is adhered to and that proper reporting is executed. This includes ensuring that Safety Data Sheets are received for all new chemicals purchased or utilized by the Company.

- Members of the **Safety** department are responsible for effectively communicating and implementing this policy and reviewing it on an annual basis.

- **Superintendents, Project Managers** and **Supervisors** are responsible for ensuring that field employees working under their supervision are properly trained in hazardous chemicals used during their operations and for ensuring compliance with this policy.

- **Project Managers** and **Safety** will ensure SDS or other HazCom data is available or distributed as required by individual projects.

5.0 General Procedures: Hazardous Communication Plan

- **Hazardous Chemical List:** A list of hazardous material and chemicals which are used in the course of normal business activities must be maintained and continually updated. This list is to include all substances that require a Safety Data Sheet (SDS).

- **Safety Data Sheets (SDS):**
  - All Safety Data Sheets must be kept in an organized fashion and must be placed in an identified and accessible location for all employees to view at will. A duplicate set of SDS information will be maintained by the Safety Director or other member of safety.
  - SDS books and the Hazardous Chemical List must be maintained and kept up to date. All

Edgerton SDS are available on the company website, www.edgerton.us. As obsolete SDS's are replaced by updated copies, they will be retained in a separate file of obsolete SDS's.

- If a hazardous chemical or substance is received without a proper SDS, the receiving person must immediately notify a member of Safety. The manufacturer or distributor of the product must be contacted immediately and asked to provide a copy of the SDS. If, for some reason, the manufacturer or distributor is unable to produce an SDS upon request, the Safety Director should be notified immediately. Hazardous materials or substances received without an SDS are to be returned to the sender.
- All SDS's received after June 1, 2015, must be in the Globally Harmonized System (GHS) format.

- **Purchasing:** only authorized employees can make purchases that involve hazardous chemicals. All purchases of hazardous chemicals must include a request for, or receipt of the SDS.

- **Labeling:**
  - Each container of a hazardous chemical that is used in or around the work area must be properly labeled with the identity of the hazardous material, the appropriate hazard warnings, and the name and address of the manufacturer. Appropriate labels must be on all containers, regardless of size. Containers must be approved and recommended for storage and/or dispensing of the hazardous chemicals contained in them.
  - All labels must be in proper GHS-format, comparable to the exemplar depicted in the Appendix to this policy.
  - Worn and torn labels must be replaced. It is the responsibility of all employees to report inappropriate, worn, or damaged labels to their Supervisor. It is the responsibility of the Hazard Communication Officer to ensure that appropriate labels are in place and that replacement labels are available.
  - Containers for materials that will be used within a particular work shift do not require labels.
  - Any unlabeled containers found in the workplace must be either (1) quarantined until the substance can be properly tested and identified or (2) properly disposed of.

- **Storage:** All storage areas for hazardous substances are to be secured, properly ventilated, and identified by proper signage.

- **Non-routine tasks:** Before any non-routine task is performed, employees shall be advised of the potential for exposure to a hazardous material and the methods of transmitting the information concerning the hazard to any personnel who could be exposed.
  - A non-routine task is any work that is:
    - Performed infrequently
    - Outside of normal duties
    - Does not have a documented procedure
    - Performed in a different way from documented procedure
    - Has never been performed before, or
    - A routine task that carries high level of risk
  - If a non-routine task is necessary, the following information about the activity as it relates to the specific chemicals expected to be encountered will be provided to employees.
    - Specific chemical name(s) and hazards(s)
    - Personal protective equipment required and safety measures to be taken
    - Measures that have taken to lessen the hazards, including ventilation, respirators, presence of other employees
    - Emergency procedures.

- **Other Personnel Exposures (Contractors):** Other personnel and outside contractors will be provided with the following information:

- Hazardous chemicals to which they may be exposed to while in the workplace
- Measures to minimize the possibility of exposure
- Location of the SDS and labeling requirements for all hazardous chemicals
- Procedures to follow if they are exposed

- **Program compliance:** Any direct or intentional violation or non-compliance with this program may result in the termination of the person or persons involved, in accordance with the company's disciplinary policies.

6.0 Training

- Employees will receive familiarization training on HazCom during new hire orientation.

7.0 Recordkeeping

- The **Safety Department** will ensure compliance with the SDS requirements of this policy.
- Training records will be maintained in individual employee personnel files.

8.0 Related Documents

- GHS Pictograms Appendix

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Globally Harmonized System (GHS) Pictograms

Health Hazard	Flame	Exclamation Mark
		
• Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	• Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	• Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder	**Corrosion**	**Exploding Bomb**
		
• Gases Under Pressure	• Skin Corrosion/Burns • Eye Damage • Corrosive to Metals	• Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle	**Environment (Non-Mandatory)**	**Skull and Crossbones**
		
• Oxidizers	• Aquatic Toxicity	• Acute Toxicity (fatal or toxic)

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Policy / Procedure: **Hot Work**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company provides the following guidelines for the safe performance of Hot Work and ensuring all employees who perform Hot Work are sufficiently trained.

2.0 Purpose/Scope

This Policy applies to all employees performing Hot Work. This Policy provides guidance for employees who perform Hot Work operations, including welding, cutting, and brazing and establishes written procedures and a permit system to prevent fires resulting from Hot Work operations involving open flames or operations that may produce heat or sparks set forth by the OSHA standard.

3.0 Definitions

- Hot Work: Hot work is defined as any temporary maintenance, renovation, or construction activity using gas or electrically powered equipment, which produces flames, sparks, or heat that is sufficient to start a fire or ignite flammable/combustible materials. Some examples of ignition sources are open flame, torch, welders, molten slag or metal, or sparks from such work.

  The following operations are considered Hot Work: Welding, acetylene/oxygen metal cutting, soldering, electric soldering, saw cutting, metal grinding, and thawing pipes.

- Hot Work Permit: A Hot Work permit is a document that is required when the task requires the use of a flame, sufficient heat, or sparks, to generate or serve as a source of ignition.

- Fire Watch: An employee who maintains awareness for the presence of fire or hazardous conditions within the hot work area before and at least 30 minutes after the hot work is complete.

4.0 Responsibilities

- **Safety** and **Project Managers** are responsible for the implementation of and compliance with this policy.

- **Supervisors** are responsible for ensuring their crews are (1) complying with the requirements of this policy and (2) trained in proper hot work procedures under this policy.

- All **Employees** are responsible for:
  - Knowing the hazards of hot work, proper fire prevention, and proper techniques for executing work safely.
  - Performing work safely and in compliance with this policy.
  - Utilizing Stop Work Obligation when you observe any unsafe activities or conditions.

5.0 General Procedures

- **Safe Work Practices:**
  - Perform site-specific inspections of the Hot Work area to identify flammable materials, hazardous processes, or other potential fire hazards that could be present.
  - Provide and use appropriate Personal Protective Equipment (PPE) for the specific Hot Work task being completed, including welding gloves, face shields, etc.

- Provide appropriate fire extinguishing equipment in the Hot Work area for the duration of the Hot Work and for 30 minutes following the Hot Work task.
- If working inside of a building, sprinkler heads or fire alarm systems shall not be covered or manipulated during Hot Work operations.
- Define if a fire watch is required. A fire watch is required when welding, cutting, brazing, and/or soldering is performed near combustible materials and/or in locations where fire may develop.
- Remove all flammable or combustible materials within a 35-foot radius of the hot work area.
- Shield combustibles in the hot work area that cannot be removed with non-combustible blankets or other non-combustible materials.
- Place non-combustible or flame-resistant screens to protect personnel in adjacent work areas from heat, flames, UV light, radiant energy, and weld spatter.
- If fire hazards cannot be taken to a safe place or guards cannot be used to confine heat, sparks, or slag and protect the immovable fire hazards, the welding/cutting operation shall not be performed.
- Ensure all cutting and welding equipment is in satisfactory condition and good repair.
- Ensure employees are suitably trained in the safe operation of equipment and understand the hot work process.
- Any welding, cutting, or burning of lead base metals, zinc, cadmium, mercury, beryllium or exotic metals or paints not listed here shall have proper ventilation or respiratory protection.
- The frame or case of the welding machine shall be grounded under the conditions and according to the methods prescribed in the National Electric Code and by the manufacturer.
- The work or metal upon which the operator welds shall be grounded to a satisfactory electrical ground. The work shall be located on a grounded metal floor, or by connections to a grounded building frame or other satisfactory ground. Pipelines carrying gases or flammable liquids and contents carrying electrical conductors for grounding purposes shall not be used.
- Any Hot Work equipment identified as being defective shall be removed from service and tagged "Do Not Use".
- Operators of equipment should report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured. Repairs shall be made only by qualified personnel.

- **Hot Work Permit System:** A Hot Work Permit shall be prepared before Hot Work operations begin. The procedures for the permits are as follows:
  - The supervisor will inspect the area before authorizing a Hot Work Permit.
  - The employee will complete the Hot Work Permit and post it until the Hot Work task is complete or for the duration of the work shift. Hot Work Permits must be closed out at the end of the work shift, no exceptions.
  - A new Hot Work Permit is required for each work shift, if the work area is left unattended for more than 30 minutes, or if the work area conditions change.
  - The employee will return the Hot Work Permit to the Supervisor after the Hot Work task is complete or at the end of the work shift.
  - The supervisor will turn in all closed out Hot Work Permits to their area Safety Representative.

- **Fire Watch and Fire Prevention:**
  - Fire Watch is required for 30 minutes after completion of all Hot Work. All Employees acting as Fire Watch should be trained in the following:
    - The hazards of the work site in correlation with the Hot Work
    - Use of an appropriate fire extinguisher
    - Procedures for initiating the fire alarm and calling 911
    - Practices to safely extinguish any small fire using the extinguisher or welding

blankets at the job site

- Hot work shall be permitted only in areas that are or have been made fire safe. If possible, hot work shall be done in specific areas designed or approved for such work, i.e., a maintenance shop or a detached outside location of noncombustible or fire-resistant construction and free of combustibles and flammable material.
- When work cannot be moved practically, the area shall be made fire safe by removing combustibles from ignition sources, wetting down the area, laying wet burlap bags over the floor, or stretching canvas or other non-combustibles that has been flame-proofed over area where work is to be performed.
- If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.
- If the object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards shall be used to confine the heat sparks and slag and to protect the immovable fire hazards.
- If the requirements stated in previous two paragraphs of this section cannot be followed the welding and cutting shall not be performed.
- Hot work shall not be permitted in buildings where fire protection is impaired; or in the presence of explosive atmospheres (mixtures of flammable gases, vapors, liquids, or dust with air); or when an explosive atmosphere may develop inside uncleaned or improperly prepared drums, tanks, or other containers and equipment that have previously contained such materials; or in areas with an accumulation of combustible ducts.
- Ducts and conveyor systems that might carry sparks to distant combustibles shall be suitably shut down or blanked off.
- If welding is to be done on a metal wall, partition, ceiling, or roof that is in contact with combustibles that cannot be relocated, a fire watch on the other side of the work shall be provided.

- **Personal Protective Equipment and Clothing:**
  - Use of commercially available flameproof gloves, aprons, capes, hardhats or shoulder covers, skull caps, spats, leggings, and high boots as required.
  - Welding shields are required by the welder and additional employees working nearby that could be exposed to the welding flash.
  - Woolen clothing is preferable to cotton and protects against temperature change. Polyester, nylon, and other similar synthetic clothing shall be avoided. Fire resistant clothing, such as Dupont Nomex, is highly recommended.
  - Long sleeves are required and shall be buttoned, cuffs and top pockets shall be avoided.
  - Pants shall not be tucked into boots while performing hot work.

6.0 Training

- Supervisors will ensure that all new employees receive training before conducting a task that meets the criteria of hot work operations in this written program. An employee can be utilized as a helper, prior to receiving the training, as long as they work directly under a trained employee.

- Training should include the following:
  - This written program
  - Hot work procedures, including how to obtain a Hot Work Permit
  - Proper equipment operation
  - Handling and storage of welding materials
  - Compressed gas cylinder safety
  - Fire Watch
  - Fire precautions
  - Fire extinguisher training
  - Physical and chemical hazards
  - Hazard control

- PPE selection and use

7.0 Program Evaluation

- The Hot Work Program will be evaluated on an annual basis.

8.0 Record Keeping

- Safety shall maintain records of employee training related to this Policy.
- Permits should be retained with project files.

9.0 Related Documents

- Fire Prevention and Protection policy

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HOT WORK PERMIT

PROJECT NAME AND #_____ **DATE:**_____

PERSON PERFORMING HOT WORK:_____

SUPERVISOR (IF DIFFERENT):_____

DESCRIPTION OF HOT WORK:_____

_____

IS FIRE WATCH REQUIRED?: **YES** ☐ **NO** ☐

NAME OF FIRE WATCH:_____ **TIME COMPLETED**_____

Fire Watch is required if:

1. Combustible materials within a 35' radius of hot work cannot be removed
2. Wall or floor openings within a 35' radius of hot work expose combustible materials in adjacent areas, including concealed spaces in walls or floors
3. Combustible materials are adjacent to the opposite side of partitions, walls, ceilings, or roof and are likely to be ignited
4. It is deemed necessary by the Permit Authorizing Individual

Fire Watch shall occur during hot work and at least 30 minutes after completion. A longer duration following completion may be necessary based on the work performed.

Fire Watch personnel shall (1) have no other assigned duties during Fire Watch, (2) be properly trained in fire extinguishers, (3) have the ability to initiate emergency response, and (4) have the ability to monitor adjacent and concealed spaces.

	PERMIT CHECKLIST
☐	Hot work tools and equipment have been inspected and found safe for use
☐	Flammable and combustible materials within a 35' radius of hot work have been removed or covered with a fire-retardant tarp or metal shield
☐	All floors and surfaces within a 35' radius of the hot work area have been swept free of combustible dust or debris
☐	Any openings or cracks in the walls, floors, or ducts that are potential travel passages for sparks, heat, or flames have been covered
☐	An appropriate, fully charged fire extinguisher that is suitable for the potential hazards is nearby and accessible
☐	Ensure that your hot work will not affect nearby fire prevention systems, e.g., smoke detector false alarms or improper activation of sprinkler systems
☐	A Fire Watch has been posted, if required, during hot work operations and for a minimum of 30 minutes after hot work is completed
☐	If hot work is performed in a confined space, confined space form has been completed

PERMIT AUTHORIZATION: The information on this permit has been evaluated, the site has been examined, and all necessary safety measures are in place.	
Printed Name:	**Signature:**

Permit is valid for lesser of 8 hours, until end of shift, or work conditions change

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Policy / Procedure: **Ladders**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

This policy provides the requirements and safe work practices for ladder use at any Company facility or active jobsite.

2.0 Purpose/Scope

This policy applies to all Company facilities and job site locations.

3.0 Definitions

- Portable Ladder: a ladder that can be readily moved or carried. This does not include scaffold ladders.
- Extension Ladder: a ladder having two or more sections joined by a sliding mechanism that allows the ladder to be extended to the total length.
- Step Ladder: a self-supporting, foldable, portable ladder, nonadjustable in length, with flat stops and without a pail shelf.
- Trench Access Ladder: a ladder that is secured at the top and bottom to access a trench that is 4' or more in depth.

4.0 Responsibilities

- **Supervisors** and **Project Managers** are responsible for the implementation of and compliance with this policy.
- **Supervisors** are responsible for ensuring their crew members understand and are trained in this policy.
- All **Employees** are responsible for:
  - Knowing the hazards of ladder use and proper techniques for use and inspection.
  - Performing work safely and under the requirements of this policy.
  - Using Stop Work Authority when confronted with an unsafe activity or condition.

5.0 General Procedures

- **Ladder Inspection**
  - Ladders are to be maintained in good condition.
  - Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.
  - Ladders should be inspected by the user before each use. Bends, cracks, loose or missing rivets, disconnected braces, or corrosion can weaken a ladder.
  - Ladders that are defective in any way are to be removed from service and tagged "DO NOT USE" (or other similar language) until made safe for use or destroyed.
  - Only manufacturers authorized repair parts can be used as replacement parts. All repairs must be performed in accordance with the manufacturer's direction.
- **Use of Ladders, Safe Work Practices:**
  - A ladder (or stairway) must be provided at all work points of access where there is a break

in elevation of 19 inches or more, except if a suitable ramp, runway, embankment, or personnel hoist, is provided to give safe access to all elevations.

- Portable Ladders will be placed on a substantial base, having clear access at the top and bottom, and set at an angle so the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (also known as the 4:1 rule).
- Portable Ladders used for access to an upper landing surface must extend a minimum of three (3) feet above the landing surface, (or where not practical, be provided with grab rails), and must also be secured against movement while in use.
- Ladders must have non-conductive side rails if they are used where the worker, or the ladder, could contact energized electrical conductors or equipment.
- Job-made ladder cleats will be uniformly spaced not less than 10 inches apart, nor more than 14 inches apart. Wooden job-made ladders with spliced side rails must be used at an angle where the horizontal distance is one-eighth of the working length of the ladder.
- Fixed ladders must be used at a pitch no greater than 90 degrees from horizontal, measured from the back side of the ladder.
- Ladders must be used only on stable and level surfaces unless they are secured to prevent accidental movement.
- Ladders must not be used on slippery surfaces unless they are secured or provided with slip-resistant feet. Slip-resistant feet must not be used as a substitute for the care in placing, lashing, or holding, a ladder upon a slippery surface.
- Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond the manufacturer's rated capacity.
- Ladders should be used only for the purpose for which they were designed. Never use ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.
- Ladders should never be spliced together to form longer sections.
- Always maintain three points of contact when traversing any ladder. Employees are to face the ladder when climbing, descending, or working from the ladder.
- You should never carry objects in your hands while ascending or descending a ladder.
- No more than one person should work from a single ladder unless the ladder is specifically designed for two people.
- The top two steps of ordinary Step Ladders should not be used as steps or as a working platform.
- Step Ladders should always be used with legs fully extended and side locks engaged.

- **Care of Ladders:**
  - Ladders should be handled with care and are not subjected to unnecessary abuse or misuse.
  - When they are not in use, ladders should be stored where they are protected from damage.
  - Users should return ladders to proper storage areas when the job is completed. Stored ladders should be secured from tipping.
  - Ladders should not be painted, except for contractor identification.
  - All manufacturer labels or markings must be on the ladder and readable / in good shape.

6.0 Training

- Employees will be familiarized in the use, care, and inspection of Portable Ladders prior to use.

7.0 Related Documents

- Excavation Safety Program
- Fall Protection policy

Policy / Procedure: **Material Handling and Storage**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Employees are required to handle and store materials according to company policy, and in accordance with any applicable local, state, and federal regulation and/or manufacturer recommendations.

2.0 Purpose/Scope

This policy applies to all Company employees responsible for the handling or storage of equipment and materials. This Policy establishes the guidelines and best work practices to be used for the safe handling and storage of materials.

3.0 Definitions

- Personal Protective Equipment (PPE): equipment, accessories, and some specialized clothing designed to create a barrier, shield, or isolate individuals from workplace hazards.

4.0 Responsibilities

- All **Employees** who engage in scopes of work that involve material handling or storage must understand this policy including knowing the hazards of their activities and proper techniques to safety complete their work.

- **Supervisors** are required to implement and ensure compliance with this policy and ensure that material handling considerations are addressed during pre-project planning.

5.0 Material Handling Planning Considerations

- Supervisors and crew members are to give advance consideration to the size, shape, and weight of material to be handled and are to plan the safest and most efficient way to accomplish the task.
- Supervisors should carefully match the work assignment to the person in terms of knowledge and physical abilities.
- Hazards are to be analyzed prior to the start of the task, and proper Personal Protective Equipment (PPE) must be chosen for each task.
- Prior to beginning work, employees are to be educated regarding potential hazards. Those identified hazards are to be documented on the Job Hazard Analysis, in addition to the control methods that are to be used to protect employees from the hazards.

6.0 General Procedures for Material Storage

- Stored materials must not create a hazard. Storage areas must be kept free from accumulated materials that may cause tripping, fires, or explosions, or that may contribute to the harboring of rats and other pests. When stacking and piling materials, it is important to be aware of such factors as the materials' height and weight, how accessible the stored materials are to the user, and the condition of the containers where the materials are being stored.
- Where applicable, load limits should be conspicuously posted in all storage areas.
- All bound material should be stacked, placed on racks, blocked, interlocked, or otherwise secured to prevent it from sliding, falling, or collapsing. A load greater than that approved by a building official may not be placed on any floor of a building or other structure.
- When an employee is placing blocks under raised loads, the employee should ensure that the load

is not released until his or her hands are clearly removed from the load. (Make sure eye contact or verbal contact with the equipment operator is made.) Blocking materials and timbers should be large and strong enough to support the load safely. Materials with evidence of cracks, rounded corners, splintered pieces, or dry rot should not be used for blocking.

- When stacking, consider the need for availability of the material. Material that cannot be stacked due to size, shape, or fragility, can be safely stored on shelves or in bins.
- When stacking materials, height limitations should be observed. For example, lumber must be stacked no more than 16 feet high if it is handled manually; 20 feet is the maximum stacking height if a forklift is used. For quick reference, walls or posts may be painted with strips to indicate maximum stacking heights.
- Used lumber must have all nails removed before stacking. Lumber must be stacked and leveled on solidly supported bracing. The stacks must be stable and self-supporting.
- Stacks of loose bricks should not be more than 7 feet in height. When these stacks reach a height of 4 feet, they should be tapered back 2 inches for every foot of height above the 4- foot level. When masonry blocks are stacked higher than 6 feet, the stacks should be tapered back one-half block for each tier above the 6-foot level.
- Bags and bundles must be stacked in interlocking rows to remain secure. Bagged material must be stacked by stepping back the layers and cross keying the bags at least every ten layers. To remove bags from the stack, start from the top row first. Boxed materials must be banded or held in place using cross-ties or shrink-wrap plastic fiber.
- Drums, barrels, and kegs must be stacked symmetrically. If stored on their sides, the bottom tiers must be blocked to keep them from rolling. When stacked on end, put planks, sheets of plywood dunnage, or pallets between each tier to make a firm, flat, stacking surface. When stacking materials two or more tiers high, the bottom tier must be chocked on each side to prevent shifting in either direction.
- Structural steel, bar stock, poles, and other cylindrical materials, unless in racks, must be stacked and blocked to prevent spreading or tilting. Pipes and bars should not be stored in racks that face main aisles; this could create a hazard to passers-by when supplies are being removed.
- Materials stored in tiers will be secured to prevent sliding, falling, or collapsing. Aisles and passageways will be kept clear and in good repair. Storage of materials may not obstruct exits. Materials will be stored according to their fire characteristics.

7.0 Safe Lifting Techniques

- **General Lifting Procedures:**
  - Employees should not attempt to manually lift items over 50 lbs. Always utilize team lifting when lifting heavy items over 50 lbs. If an item is too heavy (even if less than 50 lbs.), never risk injury—utilize team lift methods.
  - When manually moving materials, employees should seek help when a load is so bulky it cannot be properly grasped or lifted, when they cannot see around or over it, or when a load cannot be safely handled.
  - Wear the proper PPE for the lift. For loads with sharp or rough edges, wear gloves or other hand and forearm protection. To avoid injuries to the hands and eyes, use gloves and eye protection.
  - Evaluate the components you will be lifting. Check the weight of the component by lifting one side of it. If the component is too heavy or awkwardly shaped, ask for assistance.
  - Determine your route of travel if carrying material and walking. Walk the route first to get a feel for the ground and remove any tripping hazards.
  - Position your body. Get as close to the component as possible and center the material over your feet. Place your feet approximately shoulder width apart whether you are lifting from the ground or an elevated surface.
  - Bend at your knees and not your waist.
  - Keep the material tucked in close to your body and/or arms or shoulders.
  - Lift the material with your legs and keep your spine in the correct alignment.

- Make sure you can see clearly before moving the material. If your vision is blocked, use a spotter.
- If you have to change direction to pass or place a component, move your feet. Do not twist your body. Twisting while lifting or carrying a component such as a plank, post, or beam can potentially cause a back strain. Protect your shoulders, arms and hands when moving material. Look for rough or sharp edges, splinters from wood plank, protruding metal or other hazards prior to performing the lift.
- When placing a component, watch your finger placement so that you are not causing a pinch point. Handles and holders should be attached to loads to reduce the chances of getting fingers pinched or smashed.
- If placing the component on the ground or a surface that is waist level or below, reverse the lifting steps.

- **Additional Lifting Guidelines:**
  - When lifting with a team member communicate the following:
    - Who will direct the movements
    - How are you going to lift the component
    - Where are you placing the component
  - When lifting long and/or heavy components such as planks, pipe, or beams, use two people on the same level as you to lift and place together or evaluate the ability to use a mechanical mean such as a forklift.
  - Your body position is the most important part of the lift.
    - Assess how your body is placed compared to where the equipment is going to be placed. If your body is in an awkward position, you increase your chances of an injury when you try to lift a heavy object.
  - Stretching prior to lifting helps your body loosen its muscles.
  - Only lift what your body is comfortable lifting. Each person has a different capacity. No individual should lift any item over 50 lbs.
  - Our body must compensate for the weight of the object and the force it takes to lift and place the component.
  - Pay attention to your co-workers' actions and help them when needed.

- **Mechanical Lifting Procedures:**
  - To reduce the potential for accidents associated with workplace equipment, employees must be trained in the proper use and limitations of the equipment they operate. Training must be provided by a qualified instructor. Training must include load capacity instructions, distances, refueling, ramps, visibility, and balancer and counterbalances, along with operator evaluation.
  - When mechanically moving materials, avoid overloading the equipment by letting the weight, size, and shape of the material being moved dictate the type of equipment used for transporting it. All material handling equipment has rated capacities that determine the maximum weight the equipment can safely handle and the conditions under which it can handle those weights. The equipment-rated capacities must be displayed on each piece of equipment and must not be exceeded except for load testing.
  - When picking up items with a powered industrial truck (forklift or other equipment with forks attached), the load must be centered on the forks and as close to the mast as possible to minimize the potential for the truck or equipment from tipping or the load falling. A lift truck, or any heavy equipment using forks, must never be overloaded because it would be hard to control and could easily tip over or the load could easily fall and cause injury or property damage.
  - Extra weight must not be placed on the rear of a counter-balanced forklift to offset an overload. The load must be at the lowest position for traveling, and the equipment manufacturer's operational requirements must be followed. All stacked loads must be correctly piled and cross-tiered, where possible. Precautions also should be taken when stacking and storing material.

8.0 Training

- Employees involved in manual material handling activities will be familiarized in proper lifting and carrying techniques.
- Employees involved in mechanical material handling will be trained in the proper use of mechanical equipment.

9.0 Recordkeeping

- N/A

10.0 Related Documents

- Fit for Duty policy

Policy / Procedure: **Personal Protective Equipment (PPE)**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company will ensure that all employees use and maintain Personal Protective Equipment when required to help ensure the safety and health of Company employees, when use will lessen the risk of occupational injury or illness, or when required by applicable regulations.

2.0 Purpose/Scope

This policy applies to all Company employees and is intended to help ensure employees are protected from occupational hazards and provide guidelines for the proper selection, use, and training for Personal Protective Equipment.

3.0 Definitions

- Personal Protective Equipment (PPE): equipment, accessories, and some specialized clothing designed to create a barrier, shield, or isolate individuals from workplace hazards.

4.0 Responsibilities

- All Employees: All employees are responsible for identifying and knowing the hazards associated with their scope of work and selecting and using the appropriate PPE, including:
  - Being aware of when PPE is necessary.
  - Properly wearing supplied PPE when required.
  - Attending all training or safety meetings concerning the use of PPE.
  - Maintaining their PPE in a satisfactory manner.
  - Informing a Supervisor or Safety Representative of any need to repair or replace damaged, defective, worn, or misplaced PPE.

- Supervisors and Project Managers: Supervisors are responsible for implementation and compliance with this Policy, including:
  - Ensuring all employees under their supervision have access to, and proper training on PPE, and utilize all required PPE.

- Safety: Safety personnel are responsible for ensuring appropriate PPE is available. A Safety Representative should conduct a Hazard Assessment, as needed, to assess the need for any specialty PPE needed to safely perform operations.

5.0 PPE Guidelines

- **General Requirement:** All employees are required to wear the appropriate PPE to safely complete their scope of work. All PPE must comply with Company requirements and regulations.

- **Standard PPE:** The minimum general protection for all employees, when present at a job site or within a work zone, is as follows:
  - Full length work pants and a work shirt with at least 4" sleeves. Long sleeves or coveralls should be used for additional protection, as needed.
  - Hi-visibility safety vest, safety glasses, safety-toe boots, and Company issued hard hats. Hard hat use is optional for employees while operating enclosed equipment with windows and doors closed.

- Cut Level IV gloves must also be worn at all times, unless approved by a supervisor during the Job Hazard Analysis.
  - Glove use may create additional risk during certain tasks. In those scenarios, discuss other mitigation efforts during the Job Hazard Analysis to ensure adequate hand protection.

- **Eye and Face Protection:** Employees are required to use appropriate PPE, with side protection, to protect their eyes and face whenever a work task may cause foreign objects to enter the eye or injure the face. Examples of tasks requiring eye and face protection include, but are not limited to, welding, cutting, grinding, chainsaw usage, working around concrete and/or harmful chemicals, or when exposed to flying particles.

- **Hand Protection:** Employees are required to utilize appropriate gloves as hand protection based on the performance characteristics of the glove in relation to the tasks to be performed. Gloves must comply with appropriate regulations, including ANSI/ISEA 105-2016 and will be provided by the Company. Gloves should fit snugly, be appropriate for the task to be performed, and not increase risk of injury.

- **Hearing Protection:** Whenever it is not feasible to reduce the noise levels or duration of exposures, ear protection devices are to be provided and used.

- **Body (Skin) Protection:** Employees facing risk of exposure to harmful chemicals, objects, or debris should utilize proper PPE to protect their skin. Welders shall wear clothing that is appropriate for the task. Employees exposed to fall risks must wear appropriate fall protection equipment.

- **Employee Maintenance:** Employees are responsible for inspecting, cleaning, and maintaining their PPE in accordance with the manufacturer's instructions. PPE is not to be shared between employees until it has been adequately cleaned and sanitized, and fitted for proper use if necessary.

- **Damaged / Defective PPE:** Damaged or defective PPE is not to be used under any circumstances. Damaged or defective PPE should be reported to a Supervisor and discarded and replaced as soon as possible.

- **Violation of PPE Policy:** Violation of this Policy is subject to the Company's Disciplinary Policy, which can result in discipline up to and including termination of employment.

6.0 Inspections

- All Employees are responsible for inspecting their PPE before use to ensure it is free from damage or defect, and is safe for use. Never wear PPE that is damaged or defective.

7.0 Training

- Employees required to wear PPE will be evaluated and/or receive the necessary training in the proper use and care of PPE. Periodic training will be provided to PPE users when needed. Training may include, but will not necessarily be limited to, the following:
  - When PPE use is necessary and the type of PPE required
  - How to properly wear your PPE, including how to put on, take off, and adjust PPE
  - Proper inspection of PPE, including care, maintenance, useful life, and disposal of PPE

8.0 Recordkeeping

- Training records, if any, will be retained by the Safety Department.

9.0 Related Documents

- OSHA Standard 1926, Subpart E—Personal Protective & Life Saving Equipment
- Fall Protection policy
- Hot Work policy
- Respiratory Protection policy
- Silica Control Program

EDGERTON

Policy / Procedure: **Respiratory Protection Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

This Respiratory Protection Program is designed to protect employees by establishing accepted practices for respirator use, providing guidelines for training and respirator selection, and explaining proper storage, use, and care of respirators. This program also serves to help Edgerton and its employees comply with OSHA respiratory protection requirements as found in 29 CFR 1910.134.

2.0 Purpose/Scope

This program applies to all Company employees providing services that involve the use of respirators as necessary or required Personal Protective Equipment, including during normal work operations or non-routine or emergency operations. This program is intended to comply with applicable OSHA standards, including respiratory protection requirements found in 29 CFR 1910.134.

3.0 Responsibilities

- The **Program Administrator** is the Safety Manager or Director, with duties delegated as appropriate. The Program Administrator is responsible for administering the respiratory protection program. Duties of the Program Administrator include:
  - Identifying work areas, processes, or tasks that require workers to wear respirators.
  - Evaluating hazards.
  - Selecting respiratory protection options.
  - Monitoring respirator use to ensure that respirators are used in accordance with their specifications.
  - Arranging for and conducting training.
  - Ensuring proper storage and maintenance of respiratory protection equipment.
  - Fit-testing.
  - Administering medical surveillance program.
  - Maintaining records required by the program.
  - Evaluating the program.
  - Updating written program, as needed.

- **Supervisors** are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, Supervisors must also ensure that the program is understood and followed by the employees under their charge.
  Duties of the Supervisor include:
  - Ensuring that employees under their supervision (including new hires) have received appropriate training, fit-testing, and annual medical evaluation prior to use of respirators.
  - Being aware of tasks requiring the use of respiratory protection.
  - Enforcing the proper use of respiratory protection when necessary.
  - Continually monitoring work areas and operations to identify respiratory hazards.
  - Coordinating with the Program administrator on addressing respiratory hazards or other concerns regarding this program.
- All **Employees** are responsible for wearing their respirator when and where required and in the manner in which they are trained. Employees must also:
  - Ensure that respirators fit well and do not cause discomfort.
  - Care for and maintain their respirators as instructed, guard them against damage, and store them in a clean, sanitary location.

- Inform their Supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding this program.
- Use the respiratory protection equipment in accordance with the manufacturer's instructions and the training received.

4.0 General Procedures

- **Applicability:** This program applies to all employees who are required to wear respirators during normal work operations, as well as during some non-routine or emergency operations, such as a spill of a hazardous substance.

  In addition, any employee who voluntarily wears a respirator when one is not required is subject to the same medical evaluation, cleaning, maintenance, and storage elements of this program, and will be provided with necessary training.
  Work in IDLH (Immediately Dangerous to Life and Health) atmospheres is not allowed.

- **Hazard Assessment and Respirator Selection:**
  - A hazard assessment or evaluation will be conducted for each project performed to identify the need for respirators and type. This assessment can be completed during a Pre Project Checklist and Hazard Assessment. The assessment should include:
    - Identification of hazardous substances.
    - Review of work processes to determine where potential exposures to hazardous substances may occur. This review shall be conducted by surveying the workplace, reviewing the process records, and talking with employees and supervisors.
    - Exposure monitoring to quantify potential hazardous exposures.

    The proper type of respirator for the specific hazard involved will be selected in accordance with the manufacturer's instructions.

- **Updating the hazard assessment:** The Program Administrator, in collaboration with other Company personnel, will revise and update the hazard assessment as needed. If an employee feels that respiratory protection is needed during a particular activity, he or she is to contact a supervisor or the Program Administrator. The Program Administrator will evaluate the potential hazard and arrange for outside assistance as necessary. If it is determined that respiratory protection is necessary, all other elements of the respiratory protection program will be in effect for those tasks, and the respiratory program will be updated accordingly.

- **NIOSH certification:** All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while the respirator is in use.

- **Voluntary Respirator Use:** The Program Administrator shall authorize voluntary use of respiratory protective equipment as requested by all other workers on a case-by-case basis, depending on specific workplace conditions and the results of medical evaluations.
  Employees who choose to wear a half-face piece APR must comply with the procedures for medical evaluation, respirator use, cleaning, maintenance, and storage portions of this program.

- **Medical Evaluation:**
  - Employees who are either required to wear respirators, or who choose to wear a respirator voluntarily, must pass a medical evaluation, before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so.

- Any employee refusing the medical evaluation, or who does not pass the medical evaluation, will not be allowed to work in an area requiring respirator use.
- After an employee has received clearance to wear a respirator, additional medical evaluations will be provided under the following circumstances:
  - The employee reports signs or symptoms related to their ability to use the respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
  - The evaluating physician or supervisor informs the Program administrator that the employee needs to be re-evaluated.
  - Information found during the implementation of this program, including observations made during fit-testing and program evaluation, indicates a need for re-evaluation.
  - A change occurs in workplace conditions that may result in an increased physiological burden on the employee.
  - Medical evaluations will be conducted on an annual basis for those employees who regularly wear respirators.
- All medical evaluations and questionnaires are to remain confidential between the employee and the physician. The Program Administrator will only retain the physician's written recommendations regarding each employee's ability to wear a respirator.
- Medical evaluations prior to fit-testing will be confidential, during normal working hours, or at a place and time convenient to the employee, understandable, and the employee given a chance to discuss the results with the physician or other licensed health care professional (PLHCP).

- **Fit-Testing:**
  - Employees who are required to, or who voluntarily wear respirators, will be fit-tested:
    - Prior to being allowed to wear any respirator with a tight-fitting face piece
    - Annually
    - When there are changes in the employee's physical condition that could affect respiratory fit.
  - Employees will be fit-tested with the make, model, and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so that they may find an optimal fit.
  - Fit-testing of tight-fitting face pieces by qualitative or quantitative methods will be conducted.
  - The Program Administrator, or an approved delegee, will conduct fit tests in accordance with the OSHA Respiratory Protection Standard.

- **General Respirator Use:**
  - Employees will use their respirators under conditions specified in this program, and in accordance with the training they receive regarding the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
  - Respirators are required to be worn when saw-cutting concrete (unless dust-suppression (water) is being utilized), when working in a confined space with known or suspected dangerous atmospheres, and when any other type of work is required that involves breathable hazards.
  - All employees shall conduct user seal checks each time they wear their respirators. Employees shall use either the positive or negative pressure check as specified in the OSHA Respiratory Protection Standard.
    - Positive Pressure Test: This test is performed by closing of the exhalation valve with your hand. Breathe air into the mask. The face fit is satisfactory if some pressure can be built up inside the mask without any air leaking out between the mask and the face of the wearer.
    - Negative Pressure Test: This test is performed by closing off the inlet openings of

the cartridge with the palm of your hand. Some masks may require that the filter holder be removed to seal off the intake valve. Inhale gently so that a vacuum occurs within the face piece. Hold your breath for ten (10) seconds. If the vacuum remains, and no inward leakage is detected, the respirator fits properly.

5.0 Cleaning, Maintenance, and Storage

- **General Requirements:**
  - All employees shall be permitted to leave the work area to maintain their respirator for the following reasons:
    - To clean their respirator if it is impeding their ability to work
    - To change filters or cartridges
    - To replace parts
    - To inspect their respirator if it stops functioning as intended
  - Employees are not permitted to wear respirators if they have any condition, such as facial scars, facial hair, or missing dentures that would prevent a proper seal. Employees are not permitted to wear headphones, jewelry, or other items that may interfere with the seal between the face and the respirator.
  - Employees are not permitted to wear respirators if they have any condition, such as facial scars, facial hair, or missing dentures that would prevent a proper seal. Employees are not permitted to wear headphones, jewelry, or other items that may interfere with the seal between the face and the respirator.
  - Before and after each use of a respirator, an employee or immediate supervisor must make an inspection of tightness or connections and the condition of the face piece, headbands, valves, filter holders, and filters. Questionable items must be addressed immediately by the supervisor and/or Program administrator.
  - Respirator cartridges shall be replaced after eight (8) hours of use or when the ability to breathe freely seems hindered. Used cartridges must be disposed of and not reused.

- **Cleaning:**
  - Respirators are to be cleaned and disinfected after each use. Respirator wipes may be used for this purpose, or the following procedure should be followed:
    - Disassemble respirator, removing any filters, canisters, or cartridges.
    - Wash the face piece and all associated parts (except filter cartridges and elastic headbands) in an approved cleaner-disinfectant solution in warm water. Do not use organic solvents or solvents containing alcohol. Use a soft hand brush to remove dirt.
    - Rinse completely in clean, warm water.
    - Disinfect all facial contact areas by spraying the respirator with an approved disinfectant.
    - Air dry in a clean area.
    - Reassemble the respirator and replace any defective parts. Insert new filters or cartridges and make sure the seal is tight.
    - Place respirator in a clean, dry, plastic bag or other airtight container.

- **Maintenance:**
  - Respirators are to be properly maintained at all times in order to ensure that they function properly and protect employees adequately. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use. No components will be replaced, or repairs made beyond those recommended by the manufacturer.
  - All respirators shall be inspected routinely before each use.
  - The following is a list of some possible defects one might find when inspecting a respirator. If any of these, or others, are discovered, the respirator cannot be used, your supervisor and

the safety manager must be notified. You will receive a new replacement respirator.
- Cracks, tears, dents, or holes
- Face mask distortion
- Cracked or loose lenses/face shield
- Broken buckles
- Gaskets
- Improper cartridge for type of hazard
- Breathing ability
- Pliability
- Deterioration

- **Storage:**
  - After inspection, cleaning, and necessary repairs, respirators shall be stored appropriately to protect against dust, sunlight, heat, extreme cold, excessive moisture, or damaging chemicals.
  - In emergency situations where an air monitor alarm sounds, or there is any other indication that atmosphere exists in which employees could be overcome by a toxic or oxygen-deficient atmosphere, the following procedure must be followed:
    - employees in the area must stop what they are doing, shut down any equipment and immediately move away from the area.
    - A qualified individual must identify what caused the alarm and either clear the hazard from the area or determine what exact safety precautions are needed to make the area and sequence of work to be safe for all employees.

  - Employees who will work in the dangerous atmosphere must take the following precautions:
    - Never enter a dangerous atmosphere without first obtaining the proper protective equipment and permission to enter from the Program administrator or Supervisor.
    - Never enter a dangerous atmosphere without at least one additional person present. The additional person must remain in the safe atmosphere.
    - Communications (voice, visual, or signal line) must be maintained between both individuals.
    - Edgerton employees are not trained as emergency responders and are not authorized to act as such.

6.0 Program Evaluation

- The Program Administrator, in collaboration with other Company personnel, will conduct periodic evaluations to ensure that the provisions of this program are being implemented. Items to be considered will include:
  - Comfort
  - Ability to breathe without objectionable effort
  - Adequate visibility under all conditions
  - Provisions for wearing prescription glasses
  - Ability to perform all tasks without undue interference
  - Confidence in the fit of the respirator
- Identified problems will be noted in an inspection log and addressed by the Program administrator. These findings will be addressed and corrected immediately or as soon as possible.

7.0 Training

- Employees who are required to wear a respirator will be trained in the following prior to use:

- Respirator types
- Fit
- Use
- Limitations
- Emergency situations
- Wearing of a respirator
- Fit tests
- Maintenance and storage
- Medical signs and symptoms
- General requirements of the OSHA standards

8.0 Recordkeeping

- Copies of training and fit test records shall be maintained by the Program administrator. These records will be updated as new employees are trained, as employees receive refresher training, and as new fit tests are conducted.
- Copies of the physician's written recommendation regarding each employee's ability to wear a respirator will be maintained in individual employee files.

9.0 Related Documents

- Personnel Protective Equipment (PPE) policy

EDGERTON

Policy / Procedure: **Rigging**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company provides the following guidelines and requirements concerning rigging practices to ensure the safe selection, inspection, maintenance and use of rigging during any rigging or rigging-related operations.

2.0 Purpose/Scope

This Policy applies to all employees and is intended to ensure that rigging is properly selected, inspected, maintained, and used, and that rigging practices are safely performed by Company personnel to eliminate related injury or incident. The Policy provides the minimum requirements for rigging practices.

3.0 Applicability

- The Company owns limited rigging equipment for use with company-owned equipment, including but not limited to excavators, mechanics trucks and crane trucks, and overhead cranes. Rigging practices under this Policy are limited to this company-owned equipment.
    - Edgerton does not perform operations that utilize the use of mobile cranes or derricks. Edgerton employees should never be involved in a lift plan—including providing any rigging services or assistance—performed by a third party.
    - To the extent a lift is required that cannot be performed by use of company-owned equipment and rigging, a third party will be retained to complete the lift in accordance with prevailing OSHA standards.

4.0 General Procedures

- All rigging hardware is to be identified by the manufacturer with name or trademark of the manufacturer. Sling identification is required on all types of slings.
- All manufacturer documentation shall be retained and available to users of the rigging equipment, including load raging and size, traceability, working load limit, ductility, fatigue and impact properties, and any product training resources.

- **Basic Rigging Plan:** Prior to performing any lift, the Supervisor (or other competent person) shall discuss a lift plan that establishes the minimum components:
    - Competent person responsible for rigging.
    - That the rigging has been inspected and is in acceptable condition, has the proper identification, and has the necessary load rating for the lift to be performed.
    - Identification of any unusual environmental concerns or special requirements.
    - That necessary exclusion zones are prepared.
    - Tag lines are used when necessary.
    - That the rigging or sling is safe from damage or other contact that may compromise the lift.
    - That the lift area is clear of personnel or equipment that may be damaged.
    - That spotters are utilized when necessary.

- All rigging must be used within manufacturer's recommendations and industry standards, including OSHA, ASME, ANSI, API, and others.

- **User Responsibility:**
  - Utilize appropriate rigging gear suitable for overhead lifting.
  - Utilize the rigging gear within industry standards and the manufacturer's recommendations.
  - Conduct regular inspection and maintenance of the rigging gear.
  - Latches will be in place on all hooks, eliminating the hook throat opening.
  - Rigging equipment, when not in use, shall be removed from the immediate work area.
  - Taglines are required when lifting or moving material.

Please see a member of Safety for RIGGING CHARTS if you are unsure of correct rigging procedures when moving or lifting material.

5.0 Inspection Procedures

- A visual inspection shall be performed by the user or designated person each day before the rigging hardware is used. The daily inspection should confirm that the rigging has undergone proper periodic testing.
- A periodic inspection shall be performed by a designated person, at least annually, the rigging hardware shall be examined, and a determination made as to whether they constitute a hazard.
- Semi-permanent and inaccessible locations where frequent inspections are not feasible shall have periodic inspections performed.
- The following inspection requirements apply to all period inspections. If any of the below are present, the rigging hardware must be taken out of service.

- **Inspection of Rigging Hardware:**
  - The following items shall be assessed during periodic inspections of any rigging hardware:
    - Missing or illegible manufacturer's name or trademark and/or rated load identification (or size, as required)
    - A 10% or more reduction of the original dimension
    - Bent, twisted, distorted, stretched, elongated, cracked or broken load bearing components
    - Excessive nicks, gouges, pitting, and corrosion
    - Indications of heat damage including weld spatter or arc strikes, evidence of unauthorized welding
    - Loose or missing nuts, bolts, cotter pins, snap rings, or other fasteners, and retaining devices
    - Unauthorized replacement components or other visible conditions that cause doubt as to the continued use of the sling

- **Inspection of wire rope clips:** the following items shall be assessed during inspections of any wire rope clips:
  - Insufficient number of clips
  - Incorrect spacing between clips
  - Improperly tightened clips
  - Indications of damaged wire rope or wire rope slippage
  - Improper assembly Inspect wedge sockets for:
  - Indications of damaged wire rope or wire rope slippage
  - Improper assembly

- **Inspection of hooks:** the following items shall be assessed during inspections of any hooks:
  - Any visibly apparent bend or twist from the plane of the unbent hook.
  - Any distortion causing an increase in throat opening of 5%, not to exceed ¼.

- **Inspection of slings:**
  - Per ASME B30.9, a visual inspection for damage shall be performed by the user or designated person each day or shift the sling is used. A complete inspection for damage shall be performed periodically by a designated person, at least annually. Written records of the most recent periodic inspection shall be maintained.
  - Missing or illegible sling identification; evidence of heat damage; slings that are knotted; fittings that are pitted, corroded, cracked, bent, twisted, gouged, or broken; other conditions, including visible damage, that cause doubt as to the continued use of a sling.
  - Each day before being used, the sling and all fastenings and attachments shall be inspected for damage or defects by a competent person designated by the employer. Additional inspections shall be performed during sling use where service conditions warrant. Damaged or defective slings shall be immediately removed from service.
  - Job or shop hooks and links or makeshift fasteners formed from bolts, rods, or other attachments, are prohibited.
  - Tie-down chains may not be used for rigging and rigging chains may not be used for tie-down. Rigging chains and slings (any type) may not be used for tie-down or towing.
  - Whenever any sling is used, the following practices shall be observed:
    - Slings that are damaged or defective shall not be used.
    - Slings shall not be shortened or lengthened by knotting or twisting.
    - Sling legs shall not be kinked.
    - The rated load of the sling shall not be exceeded.
    - Slings used in a basket hitch shall have the loads balanced to prevent slippage.
    - Slings shall be securely attached to their load.
    - Slings shall be protected from edges, corners, or protrusions to prevent sling damage.
    - During lifting, with or without load, personnel shall be alert for possible snagging.
    - All employees shall be kept clear of loads about to be lifted and of suspended loads.
    - Hands or fingers shall not be placed between the sling and its load while the sling is being tightened around the load.
    - Shock loading is not allowed.
    - A sling shall not be pulled from under a load when the load is resting on the sling.

- **Inspection of wire rope slings:** the following items shall be assessed during inspections of any wire rope slings:
  - Excessive broken wires, for strand-laid and single part slings, ten randomly distributed broken wires in one rope lay or five broken wires in one strand in one rope lay
  - Severe localized abrasion or scraping, kinking, crushing, bird-caging
  - Any other damage resulting in damage to the rope structure
  - Severe corrosion of the rope or end attachments

- **Inspection of chain slings:** The following items shall be assessed during inspection of any chain slings:
  - Cracks or breaks
  - Excessive wear, nicks, or gouges
  - Stretched chain links or components
  - Bent, twisted, or deformed chain links or components
  - Excessive pitting or corrosion
  - Lack of ability of chain or components to hinge freely
  - Weld splatter

- **Inspection of web slings:** The following items shall be assessed during inspection of any web slings:
  - Acid or caustic burns
  - Melting or charring of any part of the sling
  - Holes, tears, cuts, or snags

- Broken or worn stitching in load bearing splices
- Excessive abrasive wear
- Discoloration and brittle or stiff areas on any part of the sling, which may mean chemical or ultraviolet/sunlight damage

- **Rigging Inspection:** Inspection of all rigging equipment needed for a task must be completed prior to using the rigging equipment.

6.0 Training

- All sling users shall be trained in the selection, inspection, cautions to personnel, effects of environment, and rigging practices.
- Personnel performing periodic (annual) rigging inspections shall possess the proper qualifications or training prior to inspection.

7.0 Recordkeeping

- Rigging Inspection documents will be maintained by Safety
- Rigging Charts will be maintained by Safety

Policy / Procedure: **Scaffold**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Company employees performing operations on scaffolds must comply with the requirements of this Policy.

2.0 Purpose/Scope

This Policy applies to all Company employees performing operations on scaffolds and is intended to provide the minimum requirements to ensure the safety of Company employees while utilizing scaffold.

3.0 Definitions

- Fall Protection: any equipment, device, or system that prevents an accidental fall from elevation or that mitigates the effect of such a fall.

- Scaffold: a temporary elevated platform (suspended or supported) and its supporting structure (including points of anchorage) used for supporting workers, materials, or both.

4.0 General Procedures

- **General Requirements:**
  - Company employees are not permitted to erect, dismantle, modify, or otherwise build any scaffold or scaffold components. If scaffolds are required for Company employees to perform operations, scaffolds will be provided through a qualified third-party vendor or subcontractor.

- **Scaffold Use:**
  - A competent person should visually inspect the scaffold prior to use and after any occurrence that could affect the integrity of the scaffold. Always contact the manufacturer or third-party vendor who supplied the scaffold to perform inspections as needed.
  - When unsafe conditions or defects are identified, stop using the scaffold, remove all personnel, and contact the scaffold provider.
  - All Company employees are required to wear a personal fall arrest system while on the scaffold unless fall hazards are fully mitigated using guardrails or other acceptable mitigation efforts and the scaffold has been green tagged for use.
  - Employees should receive the appropriate familiarization training before scaffold use, including understanding fall hazards and scaffold tagging protocols. Refresher training should be provided to any employee as needed or after any incident or event demonstrating the need for such training.
  - Employees should never access a scaffold that is red tagged or otherwise barricaded. Employees should only access a scaffold that is green or yellow tagged. If a scaffold is yellow tagged, the employee using the scaffold should understand any hazards or conditions associated with the yellow tag.
  - Always use proper access and maintain 3 points of contact.
  - Do not extend past the guardrails without utilizing 100% tie off safe work practice.
  - Do not extend your height above the guardrails.
  - When materials are located on the scaffold platform, restrain them from falling.
  - Ensure the scaffold platform is clear of hazards prior to and while working.

- **Weather Conditions:**
  - Employees shall be prohibited from working on scaffolds covered with snow, ice, or other slippery material except as necessary for removal of such materials.
  - Work on or from scaffolds is prohibited during storms or high winds unless a competent person has determined that it is safe for employees to be on the scaffold, and those employees are protected by a personal fall arrest system or wind screens. Wind screens shall not be used unless the scaffold is secured against the anticipated wind forces imposed and designed by an engineer.

5.0 Related Documents

- Fall Protection policy

Policy / Procedure: **Signs, Barricades, and Flaggers**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Company jobsites must use appropriate signs and barricades, and other applicable methods, to communicate and warn individuals of workplace hazards.

2.0 Purpose/Scope

This Policy describes the various signs and barricades typically used to identify workplace hazards, and the requirements and applicability of flagging operations.

3.0 Definitions

- Barricade: A physical barrier, either soft (barricade tape, cones, etc.), or hard (cattle gates, carpenter horses, etc.) designed to alert others to potentially hazardous work areas and to control or prevent access into these areas.

- Flagger: an employee with the requisite training and experience who is specifically designated to perform flagging operations at a worksite.

- Signs: Printed materials or notices placed in the workplace to warn of potentially hazardous areas or conditions, or to provide information pertaining to specific work area requirements for personal protective equipment or other requirements.

4.0 Responsibilities

- **Safety**, **Project Managers**, and **Supervisors** must collaborate to ensure the appropriate barricades and signs are utilized at each project site. Signs and barricades should be assessed during the Hazard Assessment process and in place prior to work commencing, when needed.

5.0 General Procedures

- **Signs:**
  - Warning signs should be posted in the workplace when necessary to warn of hazards, indicate required precautions, provide instruction, and convey information to employees.
  - Uniformity of safety signs is required to promote ease of recognition and to avoid confusion especially during times of emergency.
  - There shall be no variation in the type of design of signs posted to warn of specific dangers.
    - Dimensions, materials, finishing, lettering, and guidelines for specific signs are the responsibility of the Safety Representative designated for a particular project. They should be consulted whenever safety signs are required. These safety signs will be designed, manufactured, and deployed in accordance with the guidelines in the applicable Federal, State, Country, and Provincial government regulations (e.g., OSHA Standard 1910.145).
    - Danger signs should be used where immediate safety, fire, or health hazards exist.
  - Caution signs should be used to warn against potential hazards or to caution against unsafe practices.
  - Safety instruction signs (green and white) may be used to provide instructions and information related to safe practices.

- Informational (notice) signs may be used to convey messages, not necessarily of safety in nature, to avoid confusion or misunderstanding.

- **Barricades:**
  - Barricades and/or barricade tape shall be used if there are hazards present, such as vehicle traffic, dangerous obstructions, or overhead work.
  - Barricade tape must be placed where it is clearly visible and does not cause a potential hazard itself.
  - Barricades should be placed back from the applicable hazard (approximately 6 feet) or a standard guardrail must be installed.
  - Entry into a "Red" or "Danger" barricaded area is prohibited unless given permission by the barricade owner.
  - Before entry can be made into a "Caution" barricaded area, employees must be aware of the potential hazard and ensure that entry can be made safely.

- **Flaggers:**
  - When signs, signals, and barricades do not provide necessary protection on, or adjacent to, a highway or street, flaggers or other appropriate traffic controls will be provided.
  - All Flaggers must have the required certified flagger training prior to working in a flagger position.
  - Flaggers will wear Class 3 high-visibility warning garments, including a safety vest, safety pants, and bright-colored hard hat.
  - Flaggers will be provided with and must use Stop/Slow paddles and Stop/Stop paddles that are in full conformance with Wisconsin law and MUTCD regulations. The only time high-visibility flags can be used is on the jobsite, off the roadway, when assisting trucks or other vehicles while they are travelling in reverse.
  - When employees must flag traffic on a Wisconsin state highway, each flagger must be Wisconsin certified. The certification card must be readily available if requested by DOT or other official inspectors.
  - Flaggers must be engaged at all times; phone use during flagging duties is prohibited.
  - Flaggers will use radios when necessary to communicate.

6.0 Training

- All employees should be familiar with the signs and barricades utilized in their work location.
- All Flaggers must have proper training and certification prior to performing flagging operations.

7.0 Recordkeeping

- The Safety Department will maintain appropriate templates for all signs.

Policy / Procedure: **Silica Control Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company will implement this Silica Control Program to cover employees exposed to respirable crystalline silica at or above the OSHA action level to ensure they are properly educated, trained, and protected to prevent or reduce silica exposure and related injury or illness.

2.0 Purpose/Scope

This Program applies to all employees exposed to silica during work operations. The Program is intended to protect employees from occupational disease related to silica exposure and document the safe working practices expected of employees exposed to silica.

3.0 Definitions

- Action Level (Silica): a concentration of airborne respirable crystalline silica of 25 micrograms per cubic meter of air (μg/m³) or 0.025 milligrams per cubic meter of air (mg/m³).
- Employee Exposure (Silica): means the exposure to airborne respirable crystalline silica that would occur if the employee were not using a respirator.
- Permissible Exposure Limit (PEL) (Silica): means a concentration of airborne respirable crystalline silica of 50 μg/m³ or 0.05 mg/m³, calculated as an 8-hour Time Weighted Average (TWA).
- Respirable Crystalline Silica: means quartz, cristobalite and/or tridymite contained in airborne particles that are determined to be respirable by a sampling device designed to meet the characteristics for respirable-particle-size-selective samplers specified in the International Organization for Standardization (ISO) 7708:1995: Air Quality – Particle Size Fraction Definitions for Health-Related sampling.

4.0 Responsibilities

- **Project Managers** and **Supervisors** are responsible for identifying potential silica exposure on their individual projects and ensuring that safeguards are implemented in compliance with this Program. They are also responsible for implementing this Program and ensuring their crew members are in compliance.
- **Safety Representatives** are responsible for collaborating with operational leadership to ensure proper silica controls are implemented under this Program when necessary to ensure the safety and health of Company employees.
- **All Employees** are responsible for understanding this Program and complying with its requirements.

5.0 General Procedures

- **Specified Exposure Control Methods (Construction):**
  - For each employee engaged in a task identified in Table 1 of the OSHA Respirable Crystalline Silica standard for Construction (29 CFR 1926.1153), the engineering controls, work practices, and respiratory protection specified for the task in Table 1 will be implemented.

In implementing these control measures, the following will be considered:

- For tasks performed indoors or in enclosed areas, provide a means of exhaust as needed to minimize the accumulation of visible airborne dust:
- For tasks performed using wet methods, apply water at flow rates sufficient to minimize release of visible dust;
- For measures implemented that include an enclosed cab or booth, ensure that the enclosed cab or booth;
  - Is maintained as free as practicable from settling dust;
  - Has door seals and closing mechanisms that work properly;
  - Has gaskets and seals that are in good condition and working properly;
  - Is under positive pressure maintained through the continuous delivery of fresh air;
  - Has intake air that is filtered through a filter that is 95% efficient in the 0.3-10 μm range (e.g., MERV-16 or better); and,
  - Has heating and cooling capabilities.

- Where an employee performs more than one task in Table 1 during the course of a shift, and the total duration of all tasks combined is more than four hours, the required respiratory protection for each task will be the respiratory protection specified for more than four hours per shift. If the total duration of all tasks in Table 1 combined is less than four hours, the required respiratory protection for each task will be the respiratory protection specified for less than four hours.
- For tasks not listed in Table 1, or where engineering controls, work practices, and respiratory protection are not fully implemented, alternative control measures will be implemented as discussed below.

- **Air Monitoring:**
  - Air monitoring, under OSHA, will be used when employee exposure to silica may be at or above the applicable Action Level (and Table 1 is not implemented).
  - Air monitoring surveys are used to evaluate personal breathing zone, employee exposure levels for each process and operation. Air sampling is conducted on representative employees in each department/job category on each shift to evaluate 8-hour time weighted average exposures to respirable crystalline silica. The monitoring results are used to:
    - Determine which employees should be included in the Silica Control Program for any given task.
    - Identify which equipment, employee locations, and area are candidates for installation of engineering control measures; and
    - Select appropriate respirators to reduce employee exposures.
  - Air sampling will be conducted by a Certified Industrial Hygienist (CIH) through the Company's insurance provider or an outside consulting firm. Monitoring will be conducted using high flow sample pumps and cyclones, or other recognized size selective devices, and analyzed by an AIHA accredited laboratory using OSHA Method ID-142 or NIOSH Method 7500. The air sampling pumps are to be calibrated before and after the survey to ensure validity of the measurements and results.
  - Initial surveys are conducted to evaluate representative employees' exposures during operations at a job site. If initial monitoring indicates that employee exposures are at or above the OSHA action level, but below the OSHA PEL, monitoring will be repeated within six months of the most recent monitoring. Where initial or subsequent exposure monitoring reveals that employee exposures are above the OSHA PEL, monitoring will be repeated within three months of the most recent monitoring. Monitoring will continue at the required frequency until at least two consecutive measurements, taken at least seven days apart, are below the action level.
  - Affected employees will be informed of air sampling results within 5 (five) working days after completion of an exposure assessment. Affected employees will be notified of the air

sampling results either individually in writing, or by the posting of the results in an appropriate location that is accessible to all affected employees. Where exposure monitoring shows employee exposures are at or above the OSHA PEL, the notification will inform the employee of the actions that will be taken to reduce employee exposures to a level below the PEL.

- Additional monitoring will be conducted if changes in production, equipment, or controls are implemented to determine the effect of those changes on employee respirable crystalline silica exposures. Any employee wishing to obtain further information, or the monitoring results should contact their Supervisor or a member of the Safety Department.

- **Engineering and Work Practice Controls:**
  - If silica exposures exceed the OSHA PEL, feasible engineering and work practice controls will be implemented to reduce employee exposures to non-hazardous levels. The ultimate goal is to eliminate hazardous employee exposures to silica levels (i.e., above the OSHA PEL). However, where this is not feasible, measures to reduce employee exposures to respirable silica will be implemented. For example, the following controls may be implemented with one, or all, of the following:
    - Engineering controls are implemented to reduce employee exposures to airborne silica and respirable dust associated with the operation of heavy equipment, including trucks, loaders, etc. Examples of the engineering controls include:
      - Providing enclosed cabs for trucks and front-end loaders.
      - Ordering new equipment with air-conditioned cabs to provide for the safety and comfort of equipment operators.
      - Controlling dust generated by frequent wetting down roadways used by trucks and other mobile equipment.
    - Wet cutting equipment Is used for concrete cutting operations to reduce airborne dust levels, when possible.
    - Proper respirators and filters are used when wet cutting is not possible.
  - Periodic equipment inspections are conducted to ensure equipment operates properly with all enclosures and ventilation systems in place and operate effectively.

- **Silica Exposure Control Plan:**
  - The Company has adopted OSHA's Table 1 as its Silica Exposure Control Plan. In the event it is determined that Company employees will be performing a task that is not covered by Table 1, a job-specific exposure control plan will be created to include the following information:
    - A description of the tasks in the workplace that involve exposure to respirable crystalline silica;
    - A description of the engineering controls, work practices, and respiratory protection used to limit employee exposure to respirable crystalline silica for each task; and,
    - A description of the housekeeping measures used to limit employee exposure to respirable crystalline silica.
    - A description of the procedures used to restrict access to work areas, when necessary, to minimize the number of employees exposed to respirable crystalline silica and their level of exposure. This includes exposures generated by other employers or sole proprietors.
  - The Silica Exposure Control Plan will be evaluated at least annually and updated as necessary. A copy of the plan (Table 1) is attached to this Policy for employee review and reference.

- **Labels and Other Warnings:** Any materials, mixtures, or other products containing more than 0.1% crystalline silica will have the required specific labels, and Safety Data Sheets will be compiled and available to employees. Always request SDS sheets with product orders.

- **Housekeeping:** The following hygiene procedures have been implemented to reduce airborne dust exposures. Each employee is responsible for housekeeping in their work area.
  - Cleaning with compressed air and dry sweeping silica are prohibited.
  - HEPA-filtered vacuuming and washing down with water are used in place of dust-producing methods.
  - Maintaining surfaces free of accumulation of silica dust and on prompt spill cleanup to help reduce the potential for material to become airborne.

- **Hygiene Procedures:** The following hygiene procedures have been implemented to reduce employee exposures at job sites and the potential for contamination of the employees' vehicle and home.
  - Smoking, eating, and drinking are prohibited in areas with potential silica exposure.
  - Cleaning of work clothing by shaking or blowing with compressed air is prohibited.
  - Work clothing should be removed at the end of the shift and employees changed into clean clothes prior to leaving the site.

- **Medical Management Program:**
  - All employees exposed to crystalline silica above the OSHA action level will be included in the medical management program.
  - Edgerton has contracted with multiple medical clinics to perform baseline and periodic medical examinations, evaluate chest x-rays, and advise of any action needed as a result of the evaluation. The medical examination is performed by a licensed or certified physician. The chest x-rays are classified according to the 1970 ILO International Classification of radiographs of Pneumoconiosis by a NIOSH certified class "B" reader.
  - In the event of adverse findings, appropriate steps will be taken, including but not limited to mandatory respiratory protection protocols, additional medical examination, etc. All medical results should be discussed between the employee and physician.

- **Respiratory Protection:**
  - All employees exposed to crystalline silica above the OSHA action level will be included in the Respiratory Protection Program.

6.0 Training

- As part of our Hazard Communication Program, employees will be informed of silica health hazards; the specific operations that could result in exposure to respirable crystalline silica above the OSHA PEL; the specific procedures implemented to protect employees from exposure to respirable crystalline silica; and the purpose and description of the medical surveillance program.

7.0 Recordkeeping

- Relevant training records will be maintained by the Safety Department.
- Related medical records will be maintained for at least 30 years following the employee's termination of employment.

8.0 Related Documents

- Respiratory Protection policy
- OSHA Table 1: Silica Exposure Control Plan
- 1926.1153 Table 1: Specified Exposure Control Methods When Working with Materials Containing Crystalline Silica

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(i) Stationary masonry saws  	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None	Water Controls: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzle is working properly to apply water at the point of dust generation; ■ The spray nozzle is not clogged or damaged; and ■ All hoses and connections are intact.
(ii) Handheld power saws (any blade diameter)  	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. ■ When used outdoors. ■ When used indoors or in an enclosed area.	None APF 10	APF 10 APF 10	Water Controls: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzle is working properly to apply water at the point of dust generation; ■ The spray nozzle is not clogged or damaged; ■ All hoses and connections are intact.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(iii) Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less) 	For tasks performed outdoors only: ■ Use saw equipped with commercially available dust collection system. ■ Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. ■ Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.	None	None	Dust Collection Systems: ■ The shroud or cowling is intact and installed in accordance with the manufacturer's instructions; ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions to prevent clogging; and ■ The dust collection bags are emptied to avoid overfilling.
(iv) Walk-behind saws 	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. ■ When used outdoors. ■ When used indoors or in an enclosed area.	None APF 10	None APF 10	Water Controls: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzles are working properly to apply water at the point of dust generation; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(v) Drivable saws 	For tasks performed <u>outdoors only</u>: ■ Use saw equipped with integrated water delivery system that continuously feeds water to the blade. ■ Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None	Water Controls: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzles produce a pattern that applies water at the point of dust generation; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact.
(vi) Rig-mounted core saws or drills 	■ Use tool equipped with integrated water delivery system that supplies water to cutting surface. ■ Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None	Water Controls: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzles produce a pattern that applies water at the point of dust generation; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(vii) Handheld and stand-mounted drills (including impact and rotary hammer drills) 	■ Use drill equipped with commercially available shroud or cowling with dust collection system. ■ Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. ■ Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. ■ Use a HEPA-filtered vacuum when cleaning holes.	None	None	Dust Collection Systems: ■ The shroud or cowling is intact and installed in accordance with the manufacturer's instructions; ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions; and ■ The dust collection bags are emptied to avoid overfilling.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(viii) Dowel drilling rigs for concrete 	For tasks performed outdoors only: ■ Use shroud around drill bit with a dust collection system. Dust collector must have a filter with 99% or greater efficiency and a filter-cleaning mechanism. ■ Use a HEPA-filtered vacuum when cleaning holes.	APF 10	APF 10	Dust Collection Systems: ■ The shroud is intact and installed in accordance with the manufacturer's instructions; ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions; and ■ The dust collection bags are emptied to avoid overfilling.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(ix) Vehicle-mounted drilling rigs for rock and concrete 	Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector. OR Operate from within an enclosed cab and use water for dust suppression on drill bit.	None None	None None	Dust Collection Systems: ■ The shroud or hood is intact and installed in accordance with the manufacturer's instructions; ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions; and ■ The dust collection bags are emptied to avoid overfilling. Water Controls: ■ An adequate supply of water for dust Suppression is used; ■ The spray nozzles are working properly and produce a pattern that applies water on the discharge point from the dust collector; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(x) Jackhammers and handheld powered chipping tools 	Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact. ■ When used outdoors. ■ When used indoors or in an enclosed area. OR Use tool equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. ■ When used outdoors. ■ When used indoors or in an enclosed area.	None APF 10 None APF 10	APF 10 APF 10 APF 10 APF 10	Water Controls‡: ■ An adequate supply of water for dust suppression is used; ■ The water sprays are working properly and produce a pattern that applies water at the point of dust generation; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact. Dust Collection Systems: ■ The shroud is intact and installed in accordance with the manufacturer's instructions; ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions; and ■ The dust collection bags are emptied to avoid overfilling.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xi) Handheld grinders for mortar removal (i.e., tuckpointing)  	Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	APF 10	APF 25	Dust Collection Systems: ■ The shroud is intact, encloses most of the grinding blade, and is installed in accordance with the manufacturer's instructions; ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions; ■ The dust collection bags are emptied to avoid overfilling; ■ The blade is kept flush against the surface whenever possible; and ■ The tool is operated against the direction of blade rotation, whenever practical.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xii) Handheld grinders for uses other than mortar removal 	For tasks performed <u>outdoors only</u>: Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. OR Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism. ■ When used outdoors. ■ When used indoors or in an enclosed area.	None None None	None APF 10	Water Controls§: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzles are working properly and produce a pattern that applies water at the point of dust generation; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact. Dust Collection Systems: ■ The shroud is intact and installed in accordance with the manufacturer's instructions; ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions; and ■ The dust collection bags are emptied to avoid overfilling.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xiii) Walk-behind milling machines and floor grinders 	Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. OR Use machine equipped with dust collection system recommended by the manufacturer. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.	None None	None None	Water Controls: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzles are working properly and produce a pattern that applies water at the point of dust generation; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact. Dust Collection Systems: ■ The hose connecting the tool to the vacuum is intact and without kinks or tight bends; ■ The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions to prevent clogging; and ■ The dust collection bags are emptied to avoid overfilling.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xiv) Small drivable milling machines (less than half-lane) 	Use a machine equipped with supplemental water sprays designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.	None	None	Water Controls: ■ An adequate supply of water for dust suppression is used; ■ The spray nozzles are working properly and produce a pattern that applies water at the point of dust generation; ■ The spray nozzles are not clogged or damaged; and ■ All hoses and connections are intact.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xv) Large drivable milling machines (half-lane and larger) 	For cuts of any depth on asphalt only: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions. For cuts of four inches in depth or less on any substrate: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions. OR Use a machine equipped with supplemental water spray designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.	None None None	None None None	No additional information provided. Refer to the engineering and work practice control methods outlined.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xvi) Crushing machines 	Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyers, sieves/sizing or vibrating components, and discharge points). Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions. Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station.	None	None	Water Controls††: ■ Nozzles are located upstream of dust generation points and positioned to thoroughly wet the material; ■ The volume and size of droplets is adequate to sufficiently wet the material (optimal droplet size is between 10 and 150 µm); and ■ Spray nozzles are located far enough from the target area to provide complete water coverage but not so far that the water is carried away by wind.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xvii) Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials** 	Operate equipment from within an enclosed cab. When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.	None None	None None	No additional information provided. Refer to the engineering and work practice control methods outlined.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA†				
Equipment/Task	**Engineering and Work Practice Control Methods**	**Required Respiratory Protection and Minimum Assigned Protection Factor (APF)**		**What does *full and proper* implementation require?***
		≤ 4 hours /shift	**> 4 hours /shift**	
(xviii) Heavy equipment and utility vehicles for tasks such as grading and excavating but not including: demolishing, abrading, or fracturing silica-containing materials 	Apply water and/or dust suppressants as necessary to minimize dust emissions. OR When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.	None None	None None	The following scenarios are examples of when the employer must use water and/or dust suppressants as necessary to minimize dust emissions: ■ Equipment for grading and excavating is not equipped with enclosed, pressurized cabs. OR ■ Employees other than the operator are engaged in the task. If water or dust suppressants are applied as necessary to minimize visible dust, the employer need not provide an enclosed, filtered cab for the operator.

APF 10 (requires fit testing)		APF 25	
			
Dust Mask/Half Mask	Half Mask (Elastomeric)	Loose-Fitting Powered Air-Purifying Respirator (PAPR)	Hooded Powered Air-Purifying Respirator (PAPR)

† (1) When implementing the control measures specified in Table 1, each employer shall:

i. *For tasks performed using wet methods*, apply water at flow rates sufficient to minimize release of visible dust. The appropriate water flow rates for controlling silica dust emissions can vary; therefore, it is necessary to follow manufacturers' instructions when determining the required flow rate for dust suppression systems on a given worksite. Integrated water systems must be developed specifically for the type of tool in use so they will apply water at the appropriate dust emission points based on tool configuration and do not interfere with other tool components or safety devices.

Any slurry generated when using water to suppress dust should be cleaned up to limit secondary exposure to silica dust when the slurry dries following procedures described in the employer's *Written Exposure Control Plan*.

When working in cold temperatures, where there is a risk of water freezing, additional work practices such as insulating drums, wrapping drums with gutter heat tape or adding environmentally-friendly antifreeze.

ii. *For tasks performed using commercially available, dust collection systems (i.e. LEV)*, use equipment that is designed to effectively capture dust generated by the tool being used and does not introduce new hazards such as obstructing or interfering with safety mechanisms. The "commercially available" limitation is meant only to eliminate on-site improvisations of equipment by the employer. <u>When employers use methods other than commercially available systems for dust suppression, they must conduct exposure assessments and comply with the PEL.</u>

Some Table 1 entries for dust collection systems specify use of cyclonic pre-separators and filter cleaning mechanisms to prevent buildup of debris on filters that result in less dust capture. A cyclonic pre-separator collects large debris before the air reaches the filters. A filter cleaning mechanism prevents the need for manually cleaning filters to prevent buildup of debris (caking). Some vacuums are equipped with a gauge indicating filter pressure or an equivalent device (*e.g.*, timer to periodically pulse the filter) to help employees in determining when it is time to run a filter cleaning cycle.

i. *For tasks performed indoors or in enclosed areas*, provide a means of exhaust as needed to minimize the accumulation of visible airborne dust. Indoors or in an enclosed areas mean areas where airborne dust can build up unless additional exhaust is used. Sufficient air circulation in enclosed or indoor environments is important to ensure the effectiveness of the control strategies and to prevent the accumulation of airborne dust. The means of exhaust necessary could include: the use of portable fans (box fans, floor fans, and axial fans), portable ventilation systems, or other systems that increase air movement and assist in the removal and dispersion of airborne dust. To be effective, the ventilation must be set up so that movements of employees during work, or the opening of doors and windows, will not negatively affect the airflow.

ii. *For measures implemented that include an enclosed cab or booth*, ensure that the enclosed cab or booth:
   a. Is maintained as free as practicable from settled dust;
   b. Has door seals and closing mechanisms that work properly;
   c. Has gaskets and seals that are in good condition and working properly;
   d. Is under positive pressure maintained through continuous delivery of fresh air;
   e. Has intake air that is filtered through a filter that is 95% efficient in the 0.3-10.0 µm range (e.g., MERV-16 or better); and
   f. Has heating and cooling capabilities.

(2) Where an employee performs more than one task on Table 1 during the course of a shift, and the total duration of all tasks combined is more than four hours, the required respiratory protection for each task is the respiratory protection specified for more than four hours per shift. If the total duration of all tasks on Table 1 combined is less than four hours, the required respiratory protection for each task is the respiratory protection specified for less than four hours per shift.

* Refer to OSHA's Small Entity Compliance Guide for more information.

‡ The water delivery system is not required to be integrated or mounted on the tool; it can be assembled and installed by the employer. Acceptable water delivery systems include direct connections to fixed water lines or portable water tank systems. These water delivery systems can be operated by one worker or could require a second worker to supply the water at the point of impact.

§ The integrated water delivery system can be a free-flowing water system designed for blade cooling as well as manufacturers' systems designed for dust suppression alone. This option applies only when grinders are used outdoors.

†† The water spray systems can be installed so that they can be activated by remote control.

** NOTE: When the operator exits the enclosed cab and is no longer actively preforming the task, the operator is considered to have stopped the task. However, if other abrading, fracturing, or demolition work is performed by other heavy equipment and utility vehicles in the area while an operator is outside the cab, that operator is considered to be an employee "engaged in the task" and must be protected by the application of water and/or dust suppressants.

EDGERTON

Policy / Procedure: **Working Near or Over Water**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company has established the following guidelines and requirements to ensure safe work practices for Company operations performed near or over water.

2.0 Purpose/Scope

This Policy applies to all Company employees working over or near water, including work over or near any body of water where there is a risk or drowning. The purpose this program is to establish the requirements for working over or near water.

3.0 Definitions

- Personal Flotation Devices - Also referred to as flotation aids, life vests, or life jackets. Such devices are designed to be worn by personnel working over or near water. Personal Flotation Devices (PFDs) include both inflatable devices and those constructed of inherently buoyant materials. Each type of PFD is classified by its intended use and design features.

- Throwable Device - Made of an inherently buoyant material (does not include inflatable devices) that is primarily intended for use in calm, inland water, where additional means of rescue is present. Designed to be thrown to a person in the water and grasped and held by the user until rescued. Throwable devices are not designed to be worn. Such devices include buoyant cushions, life ring buoys, and horseshoe buoys.

- Type I PFD - Classified by the US Coast Guard (or equivalent agency) as an off-shore life jacket, this type of PFD provides the most buoyancy of all types. It is effective for all waters, especially open, rough, or remote waters where rescue may be delayed. It is designed to turn most unconscious wearers in the water to a face-up position. If this type of PFD is required for work, it shall also be equipped with a water-activated light and reflective tape.

- Type II PFD - Classified by the US Coast Guard (or equivalent agency) as a near-shore buoyancy vest, this type of PFD is intended for calm, inland water or where there is a good chance of quick rescue. Inherently buoyant PFD's of this type will turn some unconscious wearers to a face-up position in the water, but the turning is not as predictable as Type I.

- Type III PFD - Classified by the US Coast Guard (or equivalent agency) as a flotation aid, this type of PFD is good for conscious users in calm, inland water, or where there is a good chance of quick rescue. It is designed so wearers can place themselves in a face-up position in the water. Float coats, fishing vests, and vests designed with features suitable for various sports activities are examples of this type of PFD.

- Type V PFD - Classified as a special use device, this type of PFD may be used only if approved by the US Coast Guard (or equivalent agency) for "Commercial Use" or "Use as A Work Vest". It is intended for specific activities and may be used only in accordance with the approval conditions on its label. A Type V PFD provides performance of either a Type I, II, or III PFD, as marked on its label. An inflatable PFD is considered a Type V PFD and is designed for continuous wear. Inflatable PFDs are equipped with manual or automatic (water-activated) inflation systems. They provide good flotation with performance characteristics identified on their labels. Inflatables with Type I

or II performance characteristics have 11 pounds more buoyancy than a Type I with inherent buoyancy. Inflatables must have regular inspections and proper re-arming and maintenance to ensure proper performance. Under no circumstances should this PFD be used as a safety harness for climbing activity.

4.0 Responsibilities

- **Project Managers** and **Supervisors** are responsible for ensuring that all employees who work on or near water are properly trained, have adequate equipment, and comply with the safe work procedures of this Policy.

- **All Employees** who work on or near water are responsible for understanding the requirements of and complying with this Policy, and ensuring they possess the minimum training required to follow the safe work procedures of this Policy.

- **Safety Representatives** are responsible for assisting operational leadership in preparing safe work planning procedures for work on or near water when necessary.

5.0 General Procedures

- **Working Near Water Requirements:**
  - All employees working over or near water, where the danger of drowning exists, must be provided with a U.S. Coast Guard-approved (or equivalent agency) life jacket or buoyant life vest.
  - Work vest and life jackets must be inspected prior to and after each use. Should any defects that would alter their strength or buoyancy be found, defective units shall not be used.
  - Life jackets or work vests may not be needed if barricades are present that effectively eliminates the risk of falling into the water.
  - Ring buoys with at least 90 feet of line shall be provided and readily available for emergency rescue operations at least every 200 feet along the water's edge.
  - At least one lifesaving skiff shall be immediately available where employees are working over or adjacent to water.
  - Any employee working over or near water shall not work alone.

- **Fall Protection:**
  - In alignment with the Fall Protection Policy, workers exposed to fall hazards must utilize fall protection.
  - When working from a temporary work platform near or over water, employees shall not tie off to a temporary work platform. If 100% fall protection is not achievable through fixed guard rails or tie off to permanent anchor points, employees shall wear a PFD rated Type I or equivalent or a Type V water-activated inflatable PFD with a performance rating equivalent to a Type I or Type II device (a minimum of 33 pounds of buoyancy) that maintains the face-up position of the wearer. These types of PFDs shall also be equipped with water activated light, whistle, and reflective tape.
  - Employees shall not tie off to a man basket or an aerial lift that is being used over or adjacent to water if tying off to this equipment would increase the hazard of drowning.
  - Toolbelts shall only be worn if the PFD being worn can support the weight of the employee and the toolbelt. If the PFD cannot support the additional weight, the toolbelt shall not be worn.

6.0 Training

- All employees who work on or near water should be familiarized with the requirements of this Policy.

7.0 Related Documents

- Fall Protection policy

EDGERTON

Health and Environmental Policies and Programs

EDGERTON

Policy / Procedure: **Benzene Protection Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company does not perform core services that come with the potential for Benzene exposure. However, this Benzine Protection Program is in place to reduce or eliminate exposure to benzine at or above hazardous limits set by OSHA by means of engineering controls and/or safe work practices in the event of potential Benzene exposure.

2.0 Purpose/Scope

This written Benzene Protection Program shall apply to all Company employees that may be exposed or potentially exposed to Benzine during the course and scope of their work for the Company and is intended to reduce or eliminate the risk of injury or illness from Benzine exposure.

3.0 Definitions

- Action level (Benzene): an airborne concentration of Benzene of 0.5 ppm calculated as an 8-hour time-weighted average.
- Authorized person: any person specifically authorized by the employer whose duties require the person to enter a regulated area, or any person entering such an area as a designated representative of employees for the purpose of exercising the right to observe monitoring and measuring procedures.
- Benzene: liquefied or gaseous Benzene. It includes Benzene contained in liquid mixtures and the benzene vapors released by these liquids. It does not include trace amounts of unreacted Benzene contained in solid materials.
- Container: any barrel, bottle, can, cylinder, drum, reaction vessel, storage tank, etc., but does not include piping systems.
- Emergency: any occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which may or does result in an unexpected significant release of Benzene.
- Employee exposure: exposure to airborne Benzene which would occur if the employee were not using respiratory protective equipment.
- Regulated area: means any area where airborne concentrations of Benzene exceed or can reasonably be expected to exceed, the permissible exposure limits, either the 8-hour time weighted average exposure of 1 ppm or the short-term exposure limit of 5 ppm for 15 minutes.

4.0 Responsibilities

- **All Employees** who may be exposed to Benzine shall understand and comply with the requirements of this policy.
- **Safety Representatives, Project Managers, and Supervisors** shall be responsible for monitoring and guidance for the implementation of the program, as well as ensuring all employees exposed to benzine are properly trained in the Benzene program.

5.0 General Procedures

- Within the Company's core services, employees should not be exposed to Benzene at any time. If an employee discovers Benzene or the potential of Benzene exposure at any jobsite, he or she should immediately notify a Supervisor or Safety Representative.

- **Exposure Limits:**
  - The permissible exposure limit (PEL) is 1 ppm, and the short-term exposure limit (STEL) is 5 ppm. No employee may be exposed to time-weighted average concentrations above 1 ppm for an eight-hour time period and above 5 ppm for a 15-minute time period.
  - The action level (AL) is 0.5 ppm and is also a time-weighted average concentration for an eight-hour time period. Monitoring requirements become effective if the PEL, STEL, or AL are exceeded in a work area.

- **Exposure Monitoring:**
  - Air monitoring will be conducted as required by the work assignment.
  - To assess airborne exposure to Benzene, personal air samples will be collected representative of each potentially exposed work group in each work area. Future monitoring will not be necessary if the results are less than the exposure limits; however, additional monitoring may be required if there are complaints or a change in workplace operations or situations concerning Benzene.
  - Safety and health determinations will be made based on employee exposure monitoring with air samples taken from the breathing zone. Air samples will be representative of each employee's average exposure to airborne Benzene.
  - Employees must be notified within 15 working days if the personal sampling results exceed the exposure limits. The notification must also include corrective actions to minimize employee exposure.

- **Regulated Areas:**
  - OSHA defines a regulated area as "any area where airborne concentrations of Benzene exceed or can reasonably be expected to exceed, the permissible exposure limits…"
  - Access to work areas determined to be regulated areas will be restricted to designated personnel so the number of people exposed to Benzene is minimized.

- **Work Practices & Control Methods**
  - Because Benzene is highly flammable, vapors in the air can create an explosive atmosphere. Smoking, open flames, and ignition sources are prohibited in areas where Benzene is used or in a release area. Fire extinguishers will be readily available for use by trained personnel.
  - Exposure to Benzene in work areas will be avoided to prevent adverse health effects, especially exposure via inhalation and dermal absorption. Established engineering controls, Personal Protective Equipment, and work practices used to reduce Benzene exposure will be assessed during pre-project planning for preventing exposure to Benzene.
    - **Engineering controls**: Engineering controls must be established first to reduce Benzene exposure to the lowest possible level; then, if still warranted, personal protective equipment (PPE) must be used. The necessary types of engineering controls and PPE are site-specific and must be included in the site-specific plan for preventing exposure to Benzene.
    - **Personal Protective Equipment (PPE)**:
      - Skin protection: Wear appropriate personal protective clothing to prevent skin contact, including gloves, aprons, and boots. Workers should immediately wash the skin when it becomes contaminated.
      - Eye protection: Wear appropriate eye protection to prevent eye contact, to be determined by hazard assessment. Generally, splash goggles are used.

- Respiratory protection: Appropriate respirators will be utilized as required by personnel who are trained, qualified, and medically fit for respirator use. This will be done in accordance with Edgerton's written Respiratory Protection Program. Selection of respirator and cartridge will be based on written hazard assessment and airborne concentrations of Benzene.
- Clothing/PPE removal: Work clothing that becomes wet should be immediately removed due to its flammability hazard (i.e., for liquids with a flash point of <100 degrees Fahrenheit).

- **Labels and Signs:**
  - The Hazard Communication standard requires chemical containers to be labeled with the chemical identity, hazard warnings, and manufacturer. The following are additional labeling requirements for Benzene under 29 CFR 1028.
  - Container labels:

"DANGER – CONTAINS BENZENE – CANCER HAZARD"

- **Policy Requirements:**
  - Respiratory protection
    - Edgerton will provide approved respirators and filters for all Benzene hazards which an employee would encounter at a job site at no cost to the employee.
    - Edgerton will train all employees operating under the Benzene Protection Program in the proper use, maintenance, and limitation of the respirator they will be using.
    - Edgerton will provide medical physical examination and fit testing for all employees required to wear a respirator.

- **Medical surveillance**
  - Medical surveillance shall be performed for all employees who may be exposed to Benzene, at or above the action level 30 or more days per year, or employees who are or may be exposed to Benzene at or above the PEL for 10 or more days per year, or for employees who have been exposed to more than 10 ppm of Benzene for 30 days or more in a year prior to the effective date of the standard when employed by their current employer.
    - All medical examinations and procedures shall be performed by or under the supervision of a licensed physician.
    - An accredited laboratory shall conduct all laboratory tests.
    - All costs for physicals and laboratory work, etc., will be paid for by Edgerton.
  - Initial exam: Edgerton will provide employees who work in an area where he/she could be exposed to Benzene, a medical examination to include the following:
    - Detailed occupational history which includes:
      - Post-work exposure to Benzene or other hematological toxins.
      - A family history of blood diseases includes hematological neoplasms.
      - A history of blood diseases, including genetic hemoglobin abnormalities, bleeding abnormalities, abnormal function of formed blood elements.
      - A history of renal or liver dysfunction.
      - A history of medical drugs routinely taken.
      - A history of previous exposure to ionizing radiation.
      - Exposure to marrow toxins outside of the current work situation.
        - Complete physical examination, including necessary laboratory tests.
        - Annual medical examination and laboratory tests, as required.

    If an employee develops signs or symptoms commonly associated with toxic exposure to Benzene, Edgerton will provide the employee with an additional medical examination, which shall include those elements considered appropriate by the examining physician.

- Emergency examinations:
  - In addition to the surveillance required, if an employee is exposed to Benzene in an emergency situation, Edgerton will pay for the employee to be examined by a licensed physician, including any laboratory tests required.
  - If, after three months, conditions warrant, and a physician deems necessary, the employee will be provided with additional physicals per the physician's direction.

- **Escape:** Since Benzene can be fatal in only a very short period of time at concentrations greater than 10,000 ppm, anyone exposed to areas of such high concentration shall use any organic vapor gas mask or self-contained full-face breathing apparatus for the purposes of escape from the area. The escape shall be undertaken immediately upon the sensing of vapors or an alarm of vapors being this high.

- **Emergency Situation – Equal to, or greater than 100 ppm**: If an employee is exposed to a massive release of Benzene (100 ppm) due to some type of failure, the employee will be required to participate in a special medical testing program. Special tests will be provided by the end of the employee's work shift. If the results of the tests are positive, additional tests will be provided as soon as practicable and repeated one month later.

6.0 Training

- The Company will provide training on this policy to all employees whose scopes of work may expose them to Benzene.

7.0 Recordkeeping

- Edgerton is required to keep all records of an employee's exposure to Benzene and medical surveillance for a period of duration of employment plus 30 years.

8.0 Related Documents

- Respiratory Protection policy

Policy / Procedure: **Bloodborne Pathogens**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company will comply with applicable law, including but not limited to OSHA 1910.30, concerning Bloodborne Pathogens, and provide minimum guidelines to eliminate or minimize occupational exposure to Bloodborne Pathogens during work activities.

2.0 Scope

This policy applies to all Company employees with a risk of occupational exposure to Bloodborne Pathogens.

3.0 Definitions

- Bloodborne Pathogens: Any pathogenic microorganisms present in human blood that can cause disease in humans.
- Exposure Incident: Contact on an employee's eye, mouth, other mucous membrane, nonintact skin, or other parenteral contact with blood or other potentially infectious material during the performance of any work-related activity.
- Universal Precautions: The risk-averse approach to infection control founded on the assumption that all human blood, and certain human body fluids, are infected with a Bloodborne Pathogen, including but not limited to HIV or Hepatitis B.

4.0 Responsibilities

- **Safety Director** is responsible for the implementation and management of this policy.
- **Project Managers** and **Supervisors** are responsible for ensuring compliance with the requirements of this policy and working with a Safety representative to ensure the proper response to an Exposure Incident.
- All **Employees** are responsible for knowing and understanding the hazards of exposure to Bloodborne Pathogens and the measures to protect themselves from exposure and performing their work safety and within the requirements of this procedure

5.0 General Procedures

- Occupational exposure to blood and body fluids is limited for Company employees is limited and employees are not expected to encounter potential exposure to Bloodborne Pathogens. However, if an Exposure Incident occurs, the affected employee must immediately notify a Direct Supervisor and/or a Safety representative so that the potential exposure can be evaluated and the need for an Exposure Control Plan determined.
    - All notifications should be provided in compliance with the Company's Incident Notification Policy and Procedure.
- Any employee potentially exposed to Bloodborne Pathogens, such as Hepatitis B, will be offered the appropriate vaccinations.

6.0 Exposure Control Procedures

- **Universal Precautions:** All employees will observe Universal Precautions to prevent contact with blood or other potentially infectious materials. Any employee identified as having potential occupational exposure to Bloodborne Pathogens shall observe Universal Precautions.

- **Personal Protective Equipment (PPE):** PPE will be provided by the Company at no charge or cost to the employees, including but not limited to latex medical-type gloves, splash goggles, face shields, and body protection.

- **Voluntary First-Aid:**
  - If an employee administers first aid voluntarily, any contact with blood or bodily fluids should be considered potentially infectious. The employee rendering aid should utilize the appropriate PPE to guard against occupational exposure to Bloodborne pathogens, including the PPE identified above.
  - Life-threatening medical emergencies may require immediate action before PPE can be obtained—for example, the use of a one-way CPR mask or direct pressure to a hemorrhaging wound. In these situations, it is always the employee's choice and at their discretion to render assistance without the use of PPE until proper PPE can be obtained. Employees rendering aid should take advantage of whatever barrier protection is immediately available.

- **Engineering Controls and Work Practices:**
  - Handwashing facilities are available at all jobsites. Employees will thoroughly wash their hands with soap and running water after any possible contact with blood or potentially contaminated material. In the event handwashing facilities are not immediately available, affected personnel should use disposable "one-use" towelettes that utilize disinfecting and sanitizing products until proper hand washing is possible.
  - Equipment or environmental surfaces are to be cleaned and decontaminated with bleach after contact with blood or other possibly infectious materials.
  - Eating, drinking, smoking, applying cosmetics or similar materials, handling contact lenses, and touching skin with contaminated hands is prohibited in work areas where this exists a reasonable likelihood of occupational exposure to Bloodborne pathogens.

- **Labeling and Housekeeping:**
  - Any container used for biohazard waste should display the biohazard symbol. Red, leakproof, biohazard bags will be used as required.
  - When storing, handling, transporting, or shipping, regulated waste should be placed in containers that are constructed to prevent leakage, and labelled as a biohazard. The regulated waste will be discarded according to federal, state, and local regulations.

7.0 Training

- Employees will receive familiarization training on this policy.

8.0 Recordkeeping

- The Safety Department will maintain all employee medical records concerning exposure or potential exposure under this Policy in accordance with 29 CFR 1910.20.

9.0 Related Documents

- OSHA 1910.1030, Bloodborne Pathogens
- Personal Protective Equipment policy
- Incident Notification Policy and Procedure

EDGERTON

Policy / Procedure: **Chemical Storage and Handling**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All employees are required to comply with the following procedures to ensure the safe handling and storage of hazardous chemicals and to reduce the risk of chemical-related injury and illness.

2.0 Purpose/Scope

This Policy applies to all Company locations and employees and provides the guidelines and best work practices to be used for the safe handling and storage of hazardous chemicals.

3.0 Definitions

- Automatic Sprinkler System: A permanently installed system that either extinguishes or controls a fire at the location of the system.
- Bulk Storage: Liquids stored in containers exceeding 55 gallons.
- Combustible Liquid (NFPA): Any liquid having a flashpoint at or above 100° F (37.8° C).
- Flammable Gas (GHS): A gas having a flammable range with air at 20°C and a standard pressure of 101.3 kPa (14.7 psi)
- Flammable Liquid (NFPA): Any liquid having a flashpoint below 100° F (37.8° C), except any mixture having components with flashpoints of 100° F (37.8° C) or higher, the total of which makes up 99 percent or more of the total volume of the mixture.
- Flammable Liquid (GHS): A liquid having a flash point of not more than 93°C.
- Flammable (Explosive) Limits: The term "lower flammable limit (LFL)" or "lower explosive limit (LEL)" describes the minimum concentration of vapor to air below which propagation of a flame or an explosion will not occur in the presence of an ignition source. The terms "upper flammable limit (UFL)" or "upper explosive limit (UEL)" is the maximum vapor to air concentration above which propagation of flame or an explosion will not occur. If a vapor to air mixture is below the lower flammable or explosive limit, it is described as "too lean" to burn, and if it is above the upper flammable or explosive limit, it is "too rich" to burn. When the vapor to air ratio is somewhere between the lower flammable or explosive limit and the upper flammable or explosive limit, fires and/or explosions can occur.
- Flammable Material: Any liquid, solid, or gas that will ignite easily and burn rapidly.
- Flammable Solid (GHS): A solid which is readily combustible or may cause or contribute to fire through friction.
- Flash Point: The minimum temperature at which a liquid gives off vapor in sufficient concentration to form an ignitable mixture with air near the surface of the liquid.
- Grounding: The process of connecting one or more conductive objects to the ground; a specific form of bonding.

- Portable Tank: A closed container having a liquid capacity over 60 U.S. gallons and not intended for fixed installation.

- Safety Can: An approved container, of not more than 5 gallons capacity, having a spring-closing lid and spout cover, designed to safely relieve internal pressure when subjected to fire exposure. A safety can does not include plastic containers.

- Storage: Flammable or combustible liquids shall be stored in a tank or in a container that complies with paragraph (d)(2) of this section.

4.0 Responsibilities

- **Mechanic Supervisor** is responsible for ensuring all hazardous chemical storage in permanent maintenance buildings owned or operated by the Company comply with this policy.
- **Project Managers** and **Supervisors** are responsible for implementation and compliance with this Policy.
- **All Employees** are responsible for the following:
    - Knowing the hazards of their material handling activities and proper techniques.
    - Performing work safely and under the requirements of this procedure.
    - Notifying supervision when a spill is identified.
    - Using Stop Work Obligation anytime an unsafe activity or condition is observed.
    - Immediately reporting any observed unsafe act or condition.

5.0 General Procedures

- **General Material Storage**: Permanent and temporary storage is to be organized and housekeeping maintained. When placing materials and equipment for storage consider the following:
    - Clearance of automatic sprinkler systems is to meet the National Fire Protection Association standards.
    - Aisle and/or driveways are to be wide enough to make items accessible with ease of access and egress.
    - Exits, fire equipment, emergency first aid kits, circuit breaker panels, walkways, driveways, or access roads, are not to be blocked.
    - Materials should be segregated as to type, volume, and compatibility, and placed in neat, orderly stacks that are secured from collapse. If the stacks of material are high, they should be stepped back as the height increases or be secured.
    - Materials are to be stored in proper, labeled containers to minimize the potential for a spill. Whenever possible, chemicals shall be kept in closed containers and secondary containment utilized as necessary.
    - Appropriate fire extinguishers and spill response/cleanup kits shall be readily accessible in the immediate storage location.
    - In field locations, material is stored at least six feet back from a building hoist way or floor opening and ten feet back from any building exterior unless a wall extends above the top of the material being stored.
    - Material will be stored where it is not exposed to stormwater or runoff.
    - Flammable substances will not be stored together in sufficient quantity to produce an explosive atmosphere if inadvertently released; should not be stored within 100 ft/30 meters of an underground shaft; and should not be stored in the immediate vicinity of the air intake of a ventilation supply system, an internal combustion engine, or the fire box of a fired heater or furnace.

- **Flammable Material Storage:**
    - Only approved containers and portable tanks shall be used. Metal containers and portable tanks meeting the requirements of and containing products authorized by Chapter I, Title

49 of the Code of Federal Regulations (regulations issued by the Hazardous Materials Regulations Board, Department of Transportation) or other applicable regulations, shall be deemed to be acceptable.

- All containers from which flammable liquids are to be dispensed should be grounded, and when transferring flammable liquids, the dispensing container should be bonded to the receiving container.
- Containers that have previously been used for the storage of flammable liquids shall be thoroughly purged and cleaned before being used to store another flammable. Observe all environmental requirements when cleaning.
- Flammable or combustible liquids shall not be stored in areas used for exits, stairways, or normally used for the safe passage of people.
- Quantities of flammable and combustible liquids more than 25 gallons/94.5 liters shall be stored in an acceptable or approved cabinet meeting the requirements of 29 CFR 1926.152(b)(2)(i) or other applicable regulation. No more than 25 gallons/94.5 liters of flammable/combustible liquids shall be stored in a room outside of an approved storage cabinet. Cabinets shall be labeled in conspicuous lettering, "Flammable – Keep Fire Away". Not more than 60 gallons/227 liters of flammable or 120 gallons/454 liters of combustible liquids shall be stored in any one-storage cabinet. Not more than three cabinets may be located in a single storage area.
- Each portable tank shall be provided with one or more devices installed in the top with sufficient emergency venting capacity to limit internal pressure under fire exposure conditions to 10 psig, or 30 percent of the bursting pressure of the tank, whichever is greater. At least one pressure-activated vent having a minimum capacity of 6,000 cubic feet/170 cubic meters of free air (14.7 psia and 60° F) shall be used. It shall be set to open at not less than 5 psig. If fusible vents are used, they shall be actuated by elements that operate at a temperature not exceeding 300° F.
- No other equipment or materials shall be contained in the flammable storage cabinet.
- All areas used for storage of flammable liquids and gases shall be designated, and "No Smoking" signs posted. Smoking is prohibited in all areas used for storage of flammable liquids and gases. These areas shall always allow local fire protection easy access to the material.

- **Dispensing Flammable and Combustible Liquids**
  - Areas in which flammable or combustible liquids are dispensed at one time, in quantities greater than 5 gallons/19 liters from one tank or container to another tank or container, shall be separated from other operations by a 25 ft/7.6 meters distance or by construction having a fire resistance of at least 1 hour. Adequate natural or mechanical ventilation shall be provided to maintain the concentration of flammable/combustible vapors at or below 10 percent of the lower explosive limit (LEL).
  - Static electricity is generated by the contact and separation of dissimilar material such as when fluid flows through a pipe or from an orifice into a tank. If the accumulation of static charge is sufficient, a static spark may occur. Where the potential exists for static electricity to be generated in the presence of flammable/combustible liquids the containers are to be electrically bonded and grounded to prevent such accumulation of static charge.

6.0 Training

- Employees will be trained in proper spill prevention and response procedures related to their work activity.
- Employees who handle, store, or work with chemicals and flammable materials will be trained in the proper storage of these materials.

7.0 Related Documents

- Spill Control Program

EDGERTON

Policy / Procedure: **Cold Exposure Prevention**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Employees exposed to hazards related to cold exposure during Company operations must understand and comply with the requirements of this Program to ensure they understand and implement proper prevention methods to avoid cold exposure related injury or illness.

2.0 Purpose/Scope

This Program applies to all Company employees and is intended to prevent injuries and incidents caused by the effects of extreme temperatures and cold exposure. The Program sets the minimum guidelines to ensure that all employees are aware of preventative measures necessary to avoid injury or illness related to cold exposure.

3.0 Definitions

- Acclimatization: the process of the body getting used to lower temperatures. Acclimatization usually occurs within four to fourteen days of regular work with at least two hours a day in the cold.
- Cold Stress: The disruption of the body's thermal balance due to exposure to cold.
- Core Temperature: The temperature of the inner parts of the body most accurately determined by measuring with a rectal temperature.
- Environmental Risk Factors for Cold Stress: These include air temperature, relative humidity, radiant heat from the sun or other sources such as refractory brick or hot pipes in a boiler, workload severity and duration, and personal protective equipment.
- Frostnip: This occurs when the face or extremities are exposed to cold wind, causing the skin to turn white.
- Frostbite: This disorder entails an excessive drop in tissue temperature resulting in damage. Symptoms of frostbite include: skin discoloration to a white or grayish-yellow, progressing to reddish-violet, and finally black as tissue dies; pain may be felt at first, but subsides; blisters may appear; coldness and numbness of affected body part.
- Immersion Foot: This occurs when feet have been wet, but not freezing cold, for days or weeks. The primary injury is to the nerve and muscle tissue. Symptoms are numbness, swelling, or even superficial gangrene.
- Trenchfoot ("Wet Cold Disease"): This results from exposure to moisture at or near the freezing point for one to several days. Symptoms are similar to immersion foot - swelling and tissue damage.
- Hypothermia: This disorder involves the lowering of the body's core temperature. The symptoms include uncontrolled shivering fits, sense of cold, slow heartbeat, vague or slow speech, glassy stare, apathy, memory lapses, incoherence, drowsiness, cool skin, slow irregular breathing, sometimes irregular pulse, weakened pulse, apparent exhaustion, and fatigue after rest.
- Personal Risk Factors: conditions which may increase a person to be more susceptible to cold

stress: age, degree of acclimatization, health, water consumption, use of alcohol, caffeine, and drugs.

- Wind Chill: the decrease in air temperature felt when wind touches the body. Wind chill numbers are always lower than the actual outside temperature. See **Appendix A: Wind Chill Index**.

4.0 Responsibilities

- **Safety Representatives** will ensure that employees comply with the requirements of this Program and provide refresher training, as needed, to ensure employees stay aware of the risks, symptoms, and cold prevention methods of this Program.

- **Supervisors** are responsible for ensuring their operations and crew members are compliant with this Program.

- **All Employees** are responsible for understanding and complying with the requirements of this Program.

5.0 General Procedures

- **Hazard Identification:**
  - Hazards associated with cold weather conditions will be assessed as part of the Job Hazard Analysis (JHA) process and other pre-project planning. The Supervisor should identify applicable cold weather hazards and ensure proper preventative measures are implemented and / or communicated to all crew members.
  - Walkways and travel paths should be assessed during cold weather conditions. If ice or snow buildup occur and present potential hazards, then clearing, sanding, salting, or other remedial measures will be implemented to eliminate or mitigate hazards.
  - Preventative measures should be taken during all operations where cold exposure creates a hazard or health risk to any employee. Please see **Appendix A: Wind Chill Index**.

- **Prevention Methods:**
  - Administrative Controls: These controls include the following work practices and rules designed to reduce total cold stress burden on the body:
    - Scheduling a work-rest cycle to reduce the peak of cold stress and enforcing scheduled work breaks.
    - Implementing a work warm-up schedule based on temperature and wind (recommendations provided in appendix).
    - Urging frequent intake of warm, sweet, caffeine-free, nonalcoholic drinks or soup provided at regular intervals.
    - Moving work to warmer areas whenever possible; preplanning activities prior to entering the cold environment.
    - Allowing workers to pace themselves and take extra work breaks when needed.
    - Maintaining protective supervision or a buddy system for those who work during extreme temperatures.
    - Allowing new employees time to adjust to conditions before they work full-time in cold environments.
    - Arranging work to minimize sitting still or standing for long periods at a time.

  - Engineering Controls:
    - Use of on-site source of heat.
    - Use or portable, temporary heating systems (if allowed by Customer and otherwise compliant with this Safety Program, *see* Hot Work and other similar policies)
    - Hoarding, Windbreaks, etc.

- Heated warming shelters such as tents, cabins, automobiles, or trucks can be made available if work is performed continuously in extreme temperatures. Workers shall be encouraged to use them.

- Protective Clothing: its is the responsibility of all employees to dress in clothing that is appropriate for the expected work conditions. The correct clothing shall be addressed in the following manner:
  - It is important to preserve the air space between the body and the outer layer of clothing in order to retain body heat.
  - It is most important to protect the feet, hands, head, and face. The hands and feet are the farthest from the heart and become cooled most easily. Keeping the head covered is important because as much as 40 percent of heat is lost when the head is exposed to cold temperatures.
  - All clothing and equipment shall be fitted properly and not interfere with circulation.
  - Clothing should be made of thin cotton. The cotton helps evaporate sweat by absorbing it and bringing it to the surface.
  - Clothing should be of the loose-fitting type. Tight clothing of synthetic fabrics interferes with evaporation.
  - Recommended first layer of clothing shall include a cotton T-shirt and shorts or underpants under cotton and wool thermal underwear. Two-piece long underwear is preferred because the top can be removed and put on as needed.
  - Socks with high wool content are best. When two pairs are worn, the inside sock should be smaller, and made of cotton. If needed, wool socks can also double for mittens.
  - Wool or thermal trousers are preferred. The best kind is either quilted or specially lined.
  - Trousers should fit over the top of the boot to prevent snow and ice from entering.
  - It is recommended that workers wear waterproof boots and change socks whenever they become wet.
  - When wearing a hard hat, liners can be worn.
  - A face mask or scarf is vital when working in cold wind. A ski mask gives better visibility than a snorkel hood. Face protectors should be removed periodically to check for frostbite.

- **Cold Weather Supplies:** Supplies needed to implement protective measures, such as hand warmers, shovels, sand, and salt, will be maintained in adequate supply for the conditions and number of employees.

6.0 Training

- All employees should be familiarized with the requirements of this Program, including understanding the preventative measures to mitigate or prevent cold exposure-related illness or injury.

7.0 Recordkeeping

- Cold exposure related Incidents will be documented and recorded pursuant to the Company's Incident Notification Policy and Incident Response and Investigation Policy.

8.0 Related Documents

- Appendix A: Wind Chill Index

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Policy / Procedure: **Cold Exposure Prevention**	**Appendix A: Wind Chill Index (F)**

Wind chill is an index, not a physical quantity. In other words, it is calculated, not measured. Since the wind chill index represents the feeling of cold on your skin, it is not actually a real temperature, so it is given without the degree sign. For example, "Today the temperature is 10°F, and the wind chill is -4."

Wind Chill Calculation Chart

	Air Temperature (F°)														
Wind Speed (mph)	**30**	**25**	**20**	**15**	**10**	**5**	**0**	**-5**	**-10**	**-15**	**-20**	**-25**	**-30**	**-35**	**-40**
5	25	19	13	7	1	-5	-11	-16	-22	-28	-34	-40	-46	-52	-57
10	21	15	9	3	-4	-10	-16	-22	-28	-35	-41	-47	-53	-59	-66
15	19	13	6	0	-7	-13	-19	-26	-32	-39	-45	-51	-58	-64	-71
20	17	11	4	-2	-9	-15	-22	-29	-35	-42	-48	-55	-61	-68	-74
25	16	9	3	-4	-11	-17	-24	-31	-37	-44	-51	-58	-64	-71	-78
30	15	8	1	-5	-12	-19	-26	-33	-39	-46	-53	-60	-67	-73	-80
35	14	7	0	-7	-14	-21	-27	-34	-41	-48	-55	-62	-69	-76	-82
40	13	6	-1	-8	-15	-22	-29	-36	-43	-50	-57	-64	-71	-78	-84
45	12	5	-2	-9	-16	-23	-30	-37	-44	-51	-58	-65	-72	-79	-86
50	12	4	-3	-10	-17	-24	-31	-38	-45	-52	-60	-67	-74	-81	-88
55	11	4	-3	-11	-18	-25	-32	-39	-46	-54	-61	-68	-75	-82	-89
60	10	3	-4	-11	-19	-26	-33	-40	-48	-55	-62	-69	-76	-84	-91
65	10	2	-5	-12	-19	-27	-34	-41	-49	-56	-63	-70	-78	-85	-92
70	9	1	-6	-13	-20	-27	-35	-42	-49	-57	-64	-71	-79	-86	-93
75	9	1	-6	-13	-21	-28	-36	-43	-50	-58	-65	-72	-80	-87	-95
80	8	1	-7	-14	-21	-29	-36	-44	-51	-59	-66	-73	-81	-88	-96
85	8	0	-7	-15	-22	-30	-37	-44	-52	-59	-67	-74	-82	-89	-97
90	7	0	-8	15	-23	-30	-38	-45	-53	-60	-68	-75	-83	-90	-98
95	7	-1	-8	-16	-23	-31	-38	-46	-53	-61	-68	-76	-84	-91	-99
100	6	-1	-9	-16	-23	-31	-39	-47	-54	-62	-69	-77	-84	-92	-100

Approximate Thresholds:

Frostbite possible in 30 minutes*	
Frostbite possible in 10 minutes*	
Frostbite possible in less than 5 minutes*	

*Warm skin, suddenly exposed. Shorter time if skin is cool prior to exposure.

Policy / Procedure: **Fatigue Management**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

Edgerton recognizes that fatigue affects a person's health and wellbeing, increases the chance of illness and workplace injuries, and reduces performance and productivity in the workplace. The Company provides the following guidelines to educate employees and ensure they are protected from fatigue-related injury or illness.

2.0 Purpose/Scope

This Policy applies to all Company employees. The purpose of this policy is to define the requirements for managing fatigue to ensure all employees can perform their duties while avoiding the risks of fatigue-related injury or illness.

3.0 Definitions

- Fatigue: Extreme tiredness, typically resulting from mental or physical exertion.

4.0 Responsibilities

- It is the responsibility of **All Employees** to know the hazards and symptoms related to fatigue and the proper preventive measures to avoid fatigue related injury or illness at work. It is also their responsibility to immediately report any signs and symptoms of fatigue to a Supervisor or Safety Representative, so an appropriate response can occur.

  All Employees must also understand the effects of any over the counter or prescription drugs they may be taking to ensure they do not affect their ability to safety perform their work.

- It is the responsibility of all **Supervisors** to ensure that each of their crew members is not susceptible to fatigue by analyzing and observing daily tasks on the jobsite and creating a work plan that avoids fatigue-related injury or illness. Supervisors are also responsible for the implementation of and compliance with this policy.

- All **Safety Representatives** are responsible for responding to and investigating any fatigue-related incident and taking prompt action when notified of an employee suffering from fatigue-related signs or symptoms.

5.0 General Procedures

- **Fatigue Management Procedures**:
  - The Company has implemented a standard maximum work week of 58 hours for all field workers. Additional hours may be approved on a case-by-case basis with approval required from the Area Manager responsible for the project.
  - Field worker hours are to be documented by the project supervisor / foreman to monitor compliance with this policy.
  - The following Fatigue Management Procedures are in place for all Company projects, unless specifically modified in a Site Specific Safety Plan or other document approved by Area Managers:

Employee Category	Maximum Duty Hours	Minimum Rest
Equipment Operators	12 hours in any 24-hour period	8 consecutive hours off duty
Motor Vehicle Operators	10 driving hours and 12 total duty hours in any 24-hour period	10 consecutive hours off duty
Weekly Limits	58 total hours per week within 6 days	1 day off every 7 days
More than 6 Consecutive Days Worked	Maximum 10 hours per day	10 consecutive hours off duty

  - Area Manager approval to deviate from the above standard procedures must be documented. Approval should be provided in advance after evaluating project needs, employee fitness for duty, travel requirements, weather conditions, and overall fatigue risk.

- **Fatigue Reporting**: in compliance with the Company's Fitness for Duty policy, all employees shall immediately notify their supervisor if they believe fatigue, illness, medication use, or lack of sleep may impair their ability to perform work safely.
- **Removal Authority**: Supervisors have the authority and responsibility to remove employees from safety-sensitive duties when signs of fatigue are observed.
- **Stop Work**: in compliance with the Company's Stop Work Authority policy, any employee who believes fatigue is creating an unsafe condition shall stop work and notify their supervisor immediately.
- **Methods of Fatigue Prevention**:
  - Always plan a job to manage fatigue and fatigue-related injuries and illnesses, including the following:
    - Minimize extended shifts when possible
    - Schedule rest days
    - Have crew members rotate and perform various functions of short duration during extended shifts
    - Perform complex tasks earlier in the shift, if possible
    - Define whether the work is urgent or not
    - Consider travel time to and from the job site, amount of rest between workdays, shift work, etc.

  - Always prepare crews for execution of work activities by doing the following:
    - Ensure crew members have access to food and water
    - Take short and frequent breaks
    - Utilize the buddy system
    - Account for employees returning from sickness, absences, and/or restricted work
    - In conjunction with employees, identify health problems that may affect an employee's ability to work Extended Shifts

6.0 Training

- All employees exposed to fatigue-related injury or illness must receive periodic training on the hazards, signs and symptoms, causes, and measures to prevent fatigue-related injury or illness, including but not limited to the following:
  - Hazards associated with fatigue:
    - Decreased alertness
    - Slowed reaction time
    - Higher error rates
    - Poor hand-eye coordination
    - Reduced decision-making ability
    - Poor judgement

        - Easily distracted
        - Loss of awareness
    - Signs and symptoms of fatigue:
        - Blurred vision
        - Difficulty keeping eyes open
        - Head nodding
        - Feeling drowsy
        - Irritability
        - Micro sleeps – falling asleep for less than a second to a few seconds, and being un-aware that you have done so
    - Potential causes or contributing factors of fatigue:
        - Shift length
        - Inadequate breaks
        - Harsh environmental conditions
        - Lifestyle factors such as poor quality of sleep, family responsibilities, social life, commuting to/from work
        - Side effects from legal/illegal drug use

7.0 Recordkeeping

- Work hours for crew members will be recorded by the Supervisor and retained in the project file.

8.0 Related Documents

- Fit for Duty policy

Policy / Procedure: **HASP Safety Program**	Owner: **Safety**	Revision Date: **New**
		Effective Date: **June 15, 2026**

1.0 Policy

This Policy outlines the general requirements and safe working practices for employees who work with or may be involved in removal of hazardous substances under OSHA Regulation 1910.120, Hazardous Waste Operations and Emergency Response Standard (HAZWOPER).

2.0 Purpose/Scope

This procedure applies to all Company employees whose operations involve hazardous materials under OSHA Regulation 1910.120 Hazardous Waste Operations and Emergency Response Standard (HAZWOPER).

3.0 Definitions

Covered Operations: any Company operations where employees are exposed to or potentially exposed to hazardous substances as regulated by HAZWOPER regulations.

HASP: refers to a Health and Safety Plan concerning the safe handling and work involving hazardous or contaminated materials.

4.0 Responsibilities

- **Supervisors** are responsible for implementing this Policy and ensuring all Covered Operations and respective crew members comply with the requirements. **Supervisors** are also responsible for complying with the requirements of any HASP that governs operations on their project sites.

- **Safety Representatives** are responsible for collaborating with operational personnel to ensure appropriate HASP or equivalent safety plans are implemented for any project that involves Covered Operations. **Safety Representatives** are also responsible for ensuring compliance with HASPs.

- **Project Managers** are responsible for confirming if contaminated or hazardous soils or other materials are present, or may be present at their project sites, and requesting applicable soil analyses or related information to identify potential hazards. If contaminants are present at relevant levels, the **Project Manager** is responsible for requesting and confirming receipt of a HASP.

- **All Employees** performing Covered Operations are responsible for complying with the requirements of this Policy, complying with the terms of any HASP governing operations performed, and ensuring they possess the requisite HAZWOPER training before performing covered operations.

5.0 General Procedures

- A HASP will be implemented on any project where there are known or suspected contaminates above permissible exposure limits that creates a hazard for Company operations or employees. This includes any operations that may disturb hazardous or contaminated soils.
    - A HASP will also be required if operations are performed at any project that falls under hazardous waste operations or emergency response.
- The Company does not directly perform excavation or moving of contaminated material on any project if the operations cannot be performed safely with the use of Class C, Class D, or Class D modified Personal Protective Equipment.

  - The Company will not directly perform the excavation, handling, or moving of contaminated materials that require PPE above these classes. If within the Company's scope of work, the Company will retain a qualified subcontractor to perform these operations.
- A HASP will include the following minimum information:
  - Roles and responsibilities of site management personnel
  - Scopes of work that may be affected by contaminants.
  - Possible hazards, including any contaminants above PELs.
  - Methods for safe disposal of hazardous or contaminated materials.
  - PPE requirements
  - Special training requirements
  - Site communication and contact information
  - Emergency information
  - Air monitoring requirements (if necessary)
- The HASP, including hazardous materials with contaminants above PELs will be shared with all affected workers.
- Initial air monitoring should be conducted of the soil prior to excavation.
  - Additional air monitoring is necessary when conditions are unknown or changing, contaminated soil is being disturbed, there is a potential for hazardous atmospheres, workers may be exposed to PEL's over allowable limits.
- All employees performing operations at a project governed by a HASP have the absolute authority to Stop Work under the Company's Stop Work Authority policy.

6.0 Training

- All field employees will receive familiarization training on HAZWOPER during new hire orientation.
- Field employees exposed to hazards under this Policy must possess active HAZWOPER training, including annual refresher training.

7.0 Recordkeeping

- All HASPs and related documents, including soil analyses, will be retained in the relevant project file.
- Training records will be retained by the Safety Department.

8.0 Related Documents

- Excavation Safety Program
- Confined Space policy
- Stop Work Authority policy

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Policy / Procedure: **Hearing Conservation**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

This Hearing Conservation Program is intended to minimize occupational hearing loss by providing hearing protection, training, and annual hearing tests to all persons working in areas or with equipment that have noise levels equal to or exceeding an eight-hour time-weighted average (TWA) sound limit of 85 dBA (General Industry) or 90 dBA (Construction Industry) (decibels measured on the A scale of a sound level meter).

2.0 Purpose/Scope

This Policy applies to all employees exposed to TWA's that equal or exceed minimums set by OSHA. The Policy is intended to comply with OSHA's Hearing Conservation Standard, 29 CFR 1910.95.

3.0 General Responsibilities

- **Safety Representatives, Project Managers, and Supervisors** shall collaborate to ensure the following responsibilities are performed:
  - Implement engineering and administrative controls when available to limit employee exposure.
  - Ensure all employees are provided adequate hearing protection when needed.
  - Post signs and warnings in all high noise areas.
- All **Employees** are responsible for the following:
  - Understanding and complying with this Policy.
  - Using proper hearing protection in high noise areas.
  - Requesting new hearing protection when needed.
  - Immediately notify a Supervisor if you believe noise levels reach actionable limits

4.0 General Procedures

- **Noise monitoring:**
  - Monitoring of noise exposure levels will be conducted by the Safety Department as deemed necessary. It is the responsibility of the Supervisors and Project Managers to notify the Safety Director when there is a possible need for monitoring. Monitoring will be performed with the use of sound level meters or noise dosimeters.
  - Monitoring may also be conducted whenever there is non-standard equipment, processes or controls being used that may have high noise levels.

- **Hearing protection:**
  - All employees shall wear the prescribed hearing protection while working or traveling through any area that is designated as a high noise area.
    - Hearing protection will be provided at no cost to the employees who perform tasks designated as having a high noise exposure and replaced as necessary. It is the supervisor's responsibility to require employees to wear hearing protection when noise levels reach or exceed 85 dBA (General Industry) or 90 dBA (Construction Industry). Those employees will have the opportunity to choose from at least two (2) different types of hearing protection.
    - Personal stereo headsets or earphones are not approved for hearing protection and are not permitted to be used as such in any operating area of Edgerton or jobsite.
    - Signage should be displayed in areas that necessitate hearing protection.

- Preformed earplugs and earmuffs should be washed periodically and stored in a clean area. Foam inserts should be discarded after each use. Hands should be washed before handling preformed earplugs and foam inserts to prevent contaminants from being placed in the ear.

- **Audiograms/Hearing tests:**
  - Upon hire, all new employees are given a baseline audiogram to be used in comparison to future audiograms.
  - Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet the requirements. Employees shall also be notified to avoid high levels of noise.
  - Employees subject to the Hearing Conservation Program who have time-weighted average (TWA) noise exposures of 85 dBA (General Industry) or 90 dBA (Construction Industry) or greater for an eight (8) hour work shift will be required to have both a baseline and annual audiogram. The audiograms will be provided by the Company.
  - If an annual audiogram shows that an employee has suffered a standard threshold shift, the employee will be retested within thirty (30) days of the annual audiogram. If the retest confirms the occurrence of a standard threshold shift, the employee will be notified in writing within twenty-one (21) days of the confirmation. Employees who do experience a standard threshold shift will be provided with more training on the effects of noise.
  - If a threshold shift has occurred, use of hearing protection shall be re-evaluated and/or refitted and, if necessary, a medical evaluation may be required.

5.0 Training

- Employee training:
  - Affected employees will be trained in the proper usage and wearing of hearing protection. The training will be conducted at the time of hire in the form of standard Personal Protective Equipment training and audiometric testing at the time of orientation.

6.0 Recordkeeping

- Training records are maintained by the Safety Department.
- Accurate records of all employee exposure and audiometric measurements shall be maintained as required.

7.0 Related Documents

- Personal Protective Equipment policy

Policy / Procedure: **Heat Illness Prevention Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Employees exposed to heat illness or injury during Company operations must understand and comply with the requirements of this Program to, at a minimum, understand heat related risks, symptoms, and preventions.

2.0 Purpose/Scope

This Program applies to all Company employees and is intended to prevent injuries and incidents caused by the effects of extreme heat. The Program sets the minimum guidelines to ensure that all employees are aware of heat related risks, heat illness symptoms, ways to prevent illness, and actions to take if symptoms occur.

3.0 Definitions

- Acclimatization: The temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it.
- Environmental Risk Factors of Heat Illness: Working conditions that could cause heat illness. including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.
- Heat Burden: Work clothing and PPE can increase the risk of heat illness by trapping heat and limiting the body's ability to cool down. When evaporation of heat from sweating is impeded, it can increase heart rate, blood pressure, skin, and core body temperature.
- Heat Illness: A serious medical condition resulting from the body's inability to cope with heat, and may include cramps, heat exhaustion, heat syncope (fainting), and heat stroke.
- Personal Risk Factors for Heat Illness: Risk factors include age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and medications that affect the body's water retention responses to heat.
- Prevention Recovery Period: The time required to recover from the heat to prevent heat illness.

4.0 Responsibilities

- **Safety Representatives** will ensure that employees comply with the requirements of this Program and provide refresher training, as needed, to ensure employees stay aware of the risks, symptoms, and heat prevention methods of this Program.
- **Supervisors** are responsible for ensuring their operations and crew members are compliant with this Program.
- **All Employees** are responsible for understanding and complying with the requirements of this Program if their work exposes them to heat related illness.

5.0 General Procedures

- **Heat Related Illnesses and Symptoms:** All Employees should understand and be able to identify the following heat related illnesses and symptoms:
  - Heat Stroke: The most serious health problem caused by the body's failure to regulate its core temperature. Heat stroke victims may die if not treated promptly. Signs of heat stroke include:
    - High body temperature
    - Confusion
    - Lack of coordination
    - Hot and dry skin
    - Profuse sweating
    - Rapid heartbeat and breathing
    - Throbbing headache
    - Fainting
    - Seizures, coma
  - Heat Exhaustion: Results from the loss of fluid if a person does not drink enough fluids. Signs of heat exhaustion include:
    - Heat cramps
    - Rapid heartbeat
    - Heavy sweating
    - Extreme weakness
    - Dizziness
    - Nausea
    - Vomiting
    - Irritability
    - Fast shallow breathing
    - Slightly elevated body temperature
  - Heat Cramps: Painful spasms of muscles that occur when a person drinks a large quantity of fluids but fails to replace lost salt. Symptoms include:
    - **Muscle cramps**
    - **Pain or spasms in the abdomen, arms, or legs**
  - Heat Rash (Prickly Heat): Occurs when sweat is not removed by evaporation. Heat rash can make a person uncomfortable and cause a loss of productivity.
  - Sun Burn: When skin has been burned by sun exposure.

- **Heat Illness Prevention**: The following steps should be taken to mitigate or prevent heat-related illness or injury when heat-related risks are present during operations. The Heat Index Chart in the Appendix to this Policy provides general guidelines for when the temperature and/or humidity can create heat-related risks requiring preventative measures:
  - Employees should be provided sufficient time to acclimate to jobsite conditions, including during periods of high temperature or humidity.
    - New and returning workers should build a tolerance to heat and take frequent breaks.
  - All jobsites should provide enough fresh water so that each employee can drink at least 1 quart per hour.
  - Employees should be encouraged to drink at least 1 cup of water every 15 minutes, while limiting caffeinated beverages.
  - All jobsites should have sufficient access to shade for employees who feel a preventative recovery period is needed. Employees should be given ample time to recover in shade.
  - Supervisors or Safety Representatives should continually monitor employees during operations or ensure a buddy system is implemented.
  - Employees should be encouraged to wear light colored and loose clothing, or wide brimmed hats when hard hats are not required. Employees should be permitted to remove

unnecessary clothing when not needed, e.g., removing coveralls, hard hats, gloves, when on break or otherwise permissible.
    - If safe, employees should limit time spent wearing Personal Protective Equipment (PPE).
  - Employees should be afforded adequate breaks as necessary, including breaks every 15 minutes during periods of dangerous or extreme heat.
  - Employees should utilize, when necessary, SPF of at least 30, neck shades, or hard hat brim shades (that do not compromise safety) while working in extreme temperatures.

- **Heat Illness Emergency Response:**
  - If any person experiences symptoms of a heat-related medical emergency, including abnormal thinking or behavior, slurred speech, seizures, and/or loss of consciousness, take the following steps immediately:
    - Call 911 immediately
    - Cool the person right away with water or ice
    - Stay with the person until help arrives
  - Always watch for other signs of heat illness. If a person experiences any of the following symptoms:
    - Headache or nausea
    - Weakness or dizziness
    - Heavy sweating or hot, dry skin
    - Elevated body temperature
    - Thirst
    - Decreased urine output

    Take appropriate action, including:
    - Give water to drink
    - Remove unnecessary clothing or PPE
    - Move the person to a cooler area, included areas with shade
    - Cool the person with water, ice, or a fan
    - Do not leave the person alone while symptoms persist
    - Seek medical care if necessary

6.0 Training

- All employees should be familiarized with the requirements of this Program, including understanding the symptoms and preventative measures to mitigate or prevent heat-related illness or injury.

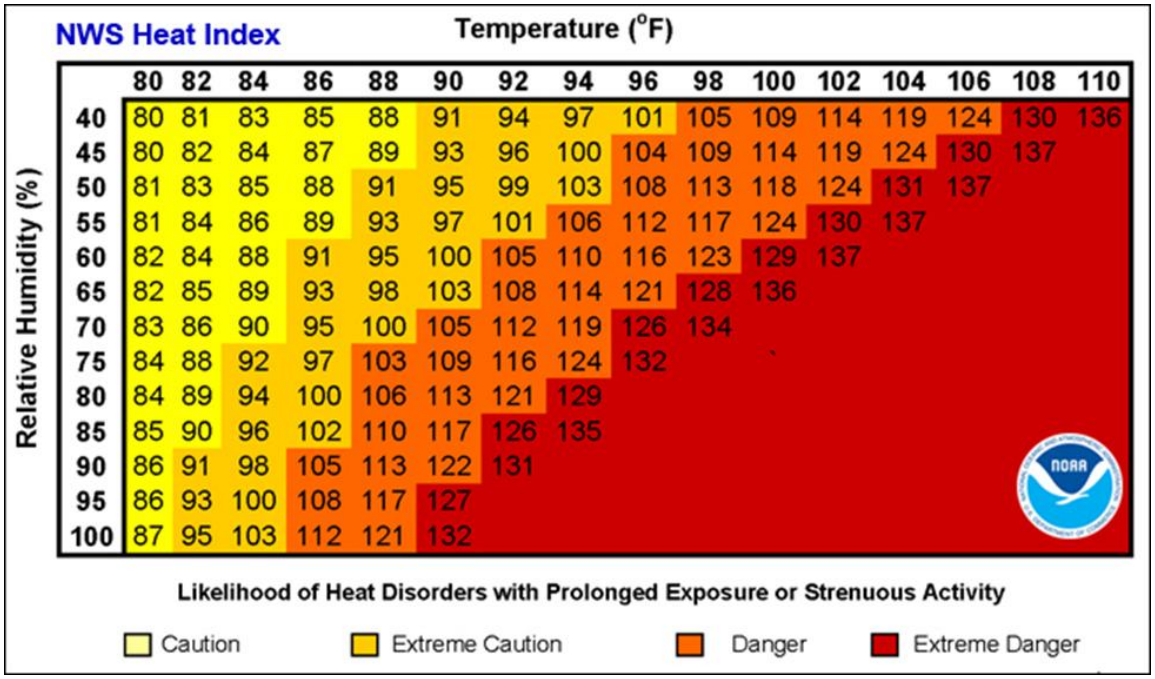
7.0 Recordkeeping

- Heat related Incidents will be documented and recorded pursuant to the Company's Incident Notification Policy and Incident Response and Investigation Policy.

8.0 Related Documents

- Heat Index
- Summary of Heat Related Illnesses
- OSHA Heat Illness Prevention Guide

Heat Index



Heat Stress Guideline				
Danger Category	Heat Index	Heat Syndrome	Resting Time	Water Needed
Extreme Danger	>115°F >46°C	Sun stroke imminent without following rest and water intake requirements	15 minutes / hour	4 cups/hour
Danger	103°F - 115°F 39.5°C - 46°C	Heat Cramps or Heat Exhaustion likely. Heat Stroke possible with prolonged exposure and physical activity.	10 minutes / hour	4 cups/hour
Extreme Caution	91°F - 103°F 33°C - 39.5°C	Heat Cramps or Heat Exhaustion possible with prolonged exposure and physical activity.	5 minutes / hour	4 cups/hour
Caution	80°F - 91°F 27°C - 33°C	Fatigue possible with prolonged exposure and physical activity.	Normal / Scheduled	4 cups/hour
Do not drink more than 6 cups per hour or 12 quarts per day (maximum water absorption rate of human body).				

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Summary of Heat Related Illnesses

Heat Related Illness	Signs and Symptoms	Emergency Care
Heat Rash	Red skin rash and reduced sweating.	Keep the skin clean, change all clothing daily, cover affected areas with powder containing corn starch or regular corn starch.
Heat Cramps	Severe muscle cramps, exhaustion, sometimes with dizziness or periods of faintness.	Move the patient to a nearby cool place; give the patient half-strength electrolyte fluids; if cramps persist, or if more serious signs develop, seek medical attention.
Heat Exhaustion	Heavy sweating Weakness Cool, pale, clammy skin Fast, weak pulse Possible muscle cramps Dizziness Nausea or vomiting Fainting	DO NOT TRY TO ADMINISTER FLUIDS TO AN UNCONSCIOUS PATIENT. Move person to a cooler environment Lay person down and loosen clothing Apply cool, wet cloths to as much of the body as possible Fan or move victim to air-conditioned room Offer sips of water If person vomits more than once, seek immediate medical attention
Heat Stroke	Altered mental state One or more of the following symptoms: throbbing headache, confusion, nausea, dizziness, shallow breathing Body temperature above 103°F Hot, red, dry or moist skin Rapid and strong pulse Faints, loses consciousness	Heat stroke is a severe medical emergency. Call 911 or get the victim to a hospital immediately. Delay can be fatal. Move the victim to a cooler, preferably air-conditioned, environment. Reduce body temperature with cool cloths or bath. Use fan if heat index temperatures are below the high 90s. A fan can make you hotter at higher temperatures. DO NOT ADMINISTER FLUIDS OF ANY KIND.

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OSHA Heat Illness Prevention Guide

HEAT ILLNESSES 101:
SYMPTOMS & FIRST AID

Knowing the symptoms of heat-related illnesses and the First Aid response to take can help you protect yourself and coworkers when extreme temperatures occur!

HEAT CRAMPS

Heat Cramps occur when the body's levels of salt and moisture are depleted, aka excessive sweating.

SYMPTOMS

- Muscle Cramps
- Pain or Spasms in the abdomen, arms, or legs.

FIRST AID

1. Stop All Activity
2. Sit in a cool area. If there is no indoor access, go under shade.
3. Drink clear juice, a sports beverage, or water with food
4. Avoid salt tablets.
5. Do not return to work for a few hours after cramping subsides.

MEDICAL ATTENTION SHOULD BE SOUGHT IF: YOU HAVE HEART PROBLEMS, ARE ON A LOW-SODIUM DIET, OR IF THE CRAMPING DOES NOT SUBSIDE WITHIN 1 HOUR.

HEAT EXHAUSTION

Heat Exhaustion is the body's response to an excessive loss of water and salt, usually through sweating.

SYMPTOMS

- Heat Cramps
- Rapid Heartbeat
- Heavy Sweating
- Extreme Weakness
- Dizziness
- Nausea
- Vomiting
- Irritability
- Fast Shallow Breathing
- Slightly Elevated Body Temperature

FIRST AID

1. Stop all activity.
2. Rest in a cool area.
3. Drink plenty of cool beverages.
4. Take a cool shower, bath or sponge bath.
5. Do not return to work for the day

MEDICAL ATTENTION SHOULD BE SOUGHT IF SYMPTOMS WORSEN OR DO NOT IMPROVE IN 1 HOUR

HEAT STROKE

Heat Stroke is the most serious heat-related illness and can lead to permanent damage or death. It occurs when the body loses control of regulating its temperature

SYMPTOMS

- Symptoms:
- High Body Temperature
- Confusion
- Lack of Coordination
- Hot and Dry Skin
- Profuse Sweating
- Rapid Heartbeat and Breathing
- Throbbing Headache
- Fainting
- Seizures, Coma

FIRST AID

1. Call 911 and/or seek medical assistance immediately.
2. Move worker into a cool, shaded area.
3. Remove any excessive clothing.
4. Try to cool their body down by applying cool water to their body, covering them with cool wet towels, applying ice to their armpits, neck, and wrists.
5. Stay with the workers until help arrives.
6. Do not force the victim to drink liquids or allow them to take pain killers or salt tablets.

MEDICAL ATTENTION SHOULD ALWAYS BE SOUGHT.

Policy / Procedure: **Housekeeping, Sanitation, and Waste Disposal**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Employees are responsible for ensuring their work areas are maintained in a clean and orderly fashion, pursuant to these guidelines. The Company will ensure proper sanitation procedures are in place, including related to toilet facilities, drinking water, and eating and drinking areas.

2.0 Purpose/Scope

This policy applies to all Company jobsites and facilities. It provides guidelines to help ensure worksite locations are kept in an orderly fashion and provide a place of employment that is conducive to efficient work activities.

3.0 General Procedures

- **Housekeeping:**
  - All materials must be stored in neat stockpiles for easy access. Tie down or support piles to prevent falling or shifting.
  - Loose materials and waste must be cleaned up promptly and kept away from stairs, platforms, and shaft openings. Aisles, walkways, ladder bases, and the bottoms of stairways will be kept clear of obstructions.
  - During construction, alteration, or repairs, form and scrap lumber with protruding nails, and all other debris shall be kept cleared from work areas, passageways, and stairs, in and around buildings or other structures. Protruding nails must be removed or bent over so they no longer present a risk.
  - Combustible scrap and debris shall be removed at regular intervals during construction. Safe means should be provided to facilitate such removal.
  - Spills of oils, grease, and water must be properly and adequately cleaned up with absorbent material and disposed of according to local rules and regulations.
  - Unobstructed access is always required, to emergency exits, fire extinguishers, safety disconnect switches, etc.

- **Waste Disposal:**
  - Containers shall be provided for the collection and separation of waste, trash, oily and used rags, and other refuse. Containers used for garbage and other oily, flammable, or hazardous waste, such as caustics, acids, harmful dust, etc. shall be equipped with tight-fitting covers and shall be leak proof. Garbage and other waste shall be disposed of at frequent and regular intervals.
  - Employees are encouraged to properly segregate waste materials to ensure reuse or recycling.
  - Employees will be instructed on the proper disposal method for waste. This is to include instruction on proper disposal of non-hazardous wastes, trash, or scrap materials, along with special instruction for any waste that is classified as hazardous.
  - Bulky waste is to be stored so as not to create a nuisance and to avoid the accumulation of solid waste and water in and around bulky items.

- **Drinking Water:**
  - Potable water is to be provided to employees in a dispenser that is designed, constructed, and serviced so that sanitary conditions are maintained. Dispensers are to be capable of being closed and equipped with a tap. Bottled water may be provided to employees as a

method to meet these guidelines. The common drinking cup is not to be used as part of the guidelines.

- **Toilet Facilities:**
  - One toilet facility will be provided for male and female workers for each 20 workers per jobsite. Facilities are to be made available for employees at temporary work sites either onsite or in conjunction with transportation to nearby facilities.
  - Toilet facilities will be kept clean and sanitary for use as provided by local, state, and federal regulations.

- **Washing Facilities and Change Rooms:**
  - When work activities and operations expose employees to contaminants that may be harmful, a wash facility is to be available for use. The location of these facilities is to be near proximity to the site and equipped to enable the employee to remove such contaminants as necessary.
  - Where employees are required by a state or federal standard to wear protective clothing because of the possibility of contamination with toxic materials, changing rooms are to be made available. Washing facilities are to be maintained in a sanitary condition as provided by local, state, and federal regulations.

- **Eating and Drinking Areas:**
  - Employees are not authorized to consume food or beverages in a toilet room nor in any area exposed to any toxic material.

4.0 Training

- All Employees should be familiar with the importance of housekeeping, sanitation, and waste disposal in their work areas.

EDGERTON

Policy / Procedure: **Hydrogen Sulfide**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Company employees whose work exposes them to hydrogen sulfide shall comply with the safe working practices and requirements of this Policy.

2.0 Purpose/Scope

This Policy applies to all Company employees exposed to hydrogen sulfide during Company operations and is intended to provide guidelines to ensure employees receive the appropriate training and comply with minimum safe work practices.

3.0 Definitions

- Hydrogen Sulfide (H2S): A colorless gas known for its pungent "rotten egg" odor at low concentrations. It is extremely flammable and highly toxic.

4.0 Responsibilities

- **Project Managers** and **Supervisors** are responsible for implementing this Policy and ensuring compliance with all jobsites they supervise and manage.
- **Safety Representatives** are responsible for ensuring compliance with this Policy.
- **All Employees** are responsible for understanding the requirements of this Policy. **All Employees** whose operations expose them to hydrogen sulfide shall ensure they possess the proper training to perform their duties safely under this Policy.

5.0 General Procedures

- **Hazard Recognition**:
  - The Threshold Limit Value (TLV) for Hydrogen Sulfide is 10 ppm in an 8 hour work day.
  - Hydrogen sulfide is a colorless, flammable, extremely hazardous gas with a "rotten egg" smell. It occurs naturally in crude petroleum and natural gas and can be produced by the breakdown of organic matter and human/animal wastes (e.g., sewage). It is heavier than air and can collect in low-lying and enclosed, poorly ventilated areas such as basements, manholes, sewer lines, and underground telephone/electrical vaults.
  - Hydrogen sulfide can be smelled at low levels, but with continuous low-level exposure or at higher concentrations you lose your ability to smell the gas even though it is still present. At high concentrations, your ability to smell the gas can be lost instantly. **DO NOT depend on your sense of smell for indicating the continuing presence of this gas or for warning of hazardous concentration.**
  - Health effects vary with how long, and at what level, you are exposed. Asthmatics may be at greater risk.
    - Low concentrations – Irritation of eyes, nose, throat, or respiratory system; effects can be delayed.
    - Moderate concentrations – More severe eye and respiratory effects, headache, dizziness, nausea, coughing, vomiting, and difficulty breathing.
    - High concentrations – Shock, convulsions, unable to breathe, coma, death; effects can be extremely rapid (within a few breaths).

1% = 10,000 parts per million (ppm)	
CONCENTRATION	PHYSICAL EFFECTS
0.02 ppm	Odor threshold
5 ppm	Obvious and unpleasant odor
10 ppm	Safe for 8 hours exposure
WEAR RESPIRATORY PROTECTION OVER 10 PPM	
WARNING: Air-purifying respirators are not approved for use for protection from H2S.	
100 ppm	Kills sense of smell in 3 to 15 minutes; may sting eyes and throat
200 ppm	Kills sense of smell rapidly; stings eyes and throat
500 ppm	Dizziness; breathing ceases in a few minutes; needs prompt artificial respiration
700 ppm	Unconscious quickly; death will result if not rescued promptly
1000 ppm	Unconscious at once; followed by death within minutes
CAUTION: Hydrogen Sulfide is a colorless and transparent gas and is flammable. It is heavier than air and may accumulate in low places.	

- **Evaluating Potential Exposure**
  - Prior to entering areas with possible hydrogen sulfide, the air needs to be tested for the presence and concentration of hydrogen sulfide by a qualified person using test equipment. This individual also determines if fire/explosion precautions are necessary.
  - Testing equipment must be equipped with an alarm that sounds at the appropriate permissible exposure limits.
  - For work-tasks that require confined space entry, consult the Confined Space Program. Atmospheric testing should always be conducted inside confined spaces prior to entry.

- **General Protection Instructions**
  - A method of protecting employees from exposure to work-area atmospheric concentrations of H2S equaling or exceeding acceptable exposure limits must be provided. Acceptable methods include, but are not limited to:
    - Requiring all personnel to wear proper respiratory protection equipment when working in the area.
    - Properly ventilating the area to maintain H2S concentrations in the work area atmosphere less than 10 ppm, confirmed by continuous monitoring.
    - A sign shall be conspicuously located at points where monitoring has determined H2S in concentrations equal to or above 10 ppm could be present and could pose a danger to personnel.
    - The sign shall read, at a minimum:

DANGER
H_2S
MAY BE PRESENT

  - When working in areas where there is a potential for an increase in H2S concentrations that may equal or exceed acceptable exposure limits, methods of protection include:
    - Installing fixed monitoring equipment.
    - Using personal monitors for all potentially affected employees.

- Testing the work-area before entry and continuously while in the area using portable detection equipment to verify that H2S concentration in the work-area remains within acceptable levels.

- **Detecting and Monitoring Hydrogen Sulfide**
  - Where the possibility of H2S exposure above 10 ppm exists, the work-area must be monitored for the presence and concentration of H2S by either continuous monitoring system, portable monitor/alarm units, or personal monitor.
  - The monitoring units should have alarm mechanisms to alert and warn personnel to evacuate the area or to use supplied air respiratory protection equipment if they are to remain in the area.

- **Respiratory Protection:** In conjunction with the Company's Respiratory Protection Policy, the following shall be followed:
  - When respiratory protection is required, the equipment (air line mask or SCBAs) will be provided at no cost to the employee.
  - A self-contained breathing apparatus (SCBA) or a supplied airline respirator with an escape bottle, and a full facepiece must be worn whenever:
    - The H2S concentration in the work-area atmosphere is at or suspected to be at a level which is 50% of the acceptable limit or greater.
    - Personnel are conducting workplace air monitoring for H2S and the H2S concentration is unknown.

- **Other Protective Equipment:**
  - Wear protective equipment to prevent eye contact. Selection of eye protection depends on the work operations conducted and other PPE worn. It may include safety glasses, chemical goggles, face shield, or a full-face respirator.
  - Consideration may need to be given to chemical protective gloves and clothing.

- **Emergency Rescue:** In the event of exposure to H2S causing injury or illness, the following emergency rescue protocols apply:
  - **NEVER** attempt a rescue in an area that may contain hydrogen sulfide without using appropriate respiratory protection and without being trained to perform such a rescue.
  - Move the victim to fresh air at once—upwind or crosswind from the exposure location.
  - Call for medical assistance immediately.
  - After reviving the victim, never leave the victim alone.
  - Check for a pulse. If there is none, have a CPR certified individual start CPR immediately and continue until they are relieved by medical personnel. If there is a pulse and breathing has stopped, apply mouth-to-mouth resuscitation and continue until a resuscitator is brought in, or normal breathing is restored.

6.0 Training

- All employees will be trained on the hazards of Hydrogen Sulfide (H2S) prior to working in an area where a Hydrogen Sulfide release could occur.

7.0 Recordkeeping

- Training records will be maintained by the Safety Department.

8.0 Related Documents

- Respiratory Protection policy

Policy / Procedure: **Lead Awareness Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company provides this Lead Awareness Program to ensure that Employees are not exposed to lead hazards. The Company does not routinely perform lead abatement or similar operations but all employees must comply with this policy to ensure all operations remain free from lead-related hazards.

2.0 Purpose/Scope

This program establishes minimum safety requirements to eliminate or minimize employee exposure to lead and related hazards.

This program applies to all operations where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the general industry standard for lead, 1910.1025(a)(2), is covered by the construction standard for lead, 1926.62.

3.0 Definitions

- Action Level (Employee exposure, Lead): Without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30ug/m3) calculated as an 8-hour time-weighted average (TWA).

- Administrative Controls: The use of management involvement, training of employees, rotation of workers, air sampling, and medical monitoring to protect individuals.

- Competent Person (for purposes of this policy only): The person who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them.

- Construction Work: work for construction, alteration or repair, including painting and decorating, including, but not limited to, the following:
  - Demolition or salvage of structures where lead or materials containing lead are present
  - Removal or encapsulation of materials containing lead.
  - New construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead, or materials containing lead.
  - Pipeline work.
  - Installation of products containing lead.
  - Lead contamination/emergency clean up.
  - Transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed.
  - Maintenance operations associated with the construction activities described in this paragraph.

- Engineering Controls: Process change, substitution, isolation, ventilation, and source modification to reduce work-related exposures.

- Lead: Metallic lead, all inorganic lead compounds, and organic lead soaps. Excluded from this definition are all other organic lead compounds.

- Permissible Exposure Limit (PEL): In accordance with OSHA 29 CRF 1910.1025, the PEL is 50 micrograms per cubic meter (50 ug/m3) of air averaged over an 8-hour period. An employee shall not be exposed above the PEL for lead averaged over an 8-hour period.

- Substance Pure Lead (Pb): A heavy metal at room temperature and pressure and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

4.0 Responsibilities

- **Safety Director**, or designee, will provide and maintain this procedure to meet the intent of the OSHA Standards 29 CFR 1910.1025 and 29 CFR 1926.62, and provide notification to employees and technical assistance in the implementation of this procedure.

- **Project Managers** and **Supervisors** are responsible for identifying potential employee exposures to lead, developing standard operating procedures for routine work to comply with the written program, and scheduling air monitoring as needed with the Safety Department.

- All **Employees** will be responsible for complying with this Policy to minimize potential lead exposure, and inform their Supervisors if they have health concerns that may be pertinent to lead exposure.

5.0 General Procedures

- Edgerton does not routinely self-perform any lead removal or abatement operations, or operations that require lead removal or abatement. Any operations included within the company's approved scopes of work that require lead removal or abatement must be completed by a qualified team of employees, or qualified subcontractor experienced and/or licensed in lead removal or abatement.
- All Company employees performing operations at a location where a subcontractor is performing lead abatement or removal must be informed of the procedures and precautions established for safe operations, including the location of any lead and removal / abatement operations.
- All Employees should immediately notify their Supervisor or a Safety Representative if they encounter any material that may possibly contain lead, and exercise Stop Work Authority.

6.0 Lead Awareness Program

- **General Hazards:**
  - We know that overexposure to lead can have serious effects on health.
  - Lead's dangers come not from skin contact, but from breathing in too much lead dust or fumes. There's also a risk of swallowing lead if a person touches food, cigarettes, cosmetics, etc., when their hands are contaminated by lead.
  - Lead-based paint and paint debris are a key hazard when painting, repainting, rehabbing, demolishing, or renovating buildings, tanks, bridges, etc. Lead bricks, mortar, and sheets, lead support rods and construction materials, mineral wool insulation with lead contaminants, lead pipes, lead solder, and leaded steel roofing materials are potential hazards when involved in renovation, re-insulation, industrial vacuuming, etc.
  - There is also a risk of hazardous exposure in any work environment that makes or uses products that contain lead. A very large dose of lead, i.e. children eating large amounts of lead-based paint, can have almost immediate effects. It can cause seizures, coma, and in a matter of days, death.
  - Most of the effects, however, take time to show up. When lead enters the body, it gets into the bloodstream and from there into organs and body tissues. If the body takes in more lead than it can naturally eliminate, the lead builds up and, over time, can cause severe and irreversible damage to the blood-forming, nervous, urinary, and reproductive systems.
  - The milder, short-term effects of overexposure to lead can include loss of appetite, metallic

taste in the mouth, anxiety, constipation, nausea, pallor, tiredness, weakness, insomnia, headache, nervous, irritability, muscle and joint pain or soreness, tremors, numbness, dizziness, hyperactivity, and stomach pain. If an employee works with or is around lead and has any of these symptoms, it is crucial that the employee reports this immediately. Chronic overexposure to lead can cause much more serious problems; problems that rarely show symptoms until it is too late to reverse them.

- Chronic overexposure to lead can cause the following:
  - Anemia – A decrease in the blood's capacity to carry oxygen, when can cause weakness and tiredness.
  - Nervous system damage – Sometimes this is temporary, but the worst cases can lead to severe, or even fatal, brain damage. The symptoms of lead-caused nervous system damage can be vomiting, poor memory, restlessness, irritability, tremors, convulsions, muscular weakness, and a feeling of dullness progressing to drowsiness and stupor.
  - Kidney disease – Urinary problems and other symptoms of lead-related kidney disease don't usually show up until kidney damage is major and usually permanent.
  - Reproductive impairment – Lead is a reproductive risk for both men and women. It may decrease women's fertility and cause abnormal menstrual cycles. For men, overexposure may decrease the sex drive or cause impotence or sterility. One of the worst hazards of lead is the danger it poses to both men and women who plan to have children. Women who are pregnant, or plan to be, should avoid long-term exposure to lead. If either parent has been overexposed to lead, there is a greater chance of miscarriage or stillbirth. Any children born to a parent exposed to high lead levels are more likely to have birth defects, mental retardation, behavioral disorders, and/or die during the first year of childhood.

- **OSHA Regulations:**
  - OSHA Standards 29 CFR 1910.1025 and 29 CFR 1926.62 are both designed to identify hazardous work and to reduce exposure. These regulations set a permissible exposure limit (PEL) of a time-weighted average of 50 micrograms of lead per cubic meter of air. This is the highest level of lead in the air to which an employee can be exposed over an eight-hour workday. Short-term exposures above the PEL are permitted as long as the workday average stays within the regulated limit. OSHA notes in the regulations, however, that exposure to levels below 40 micrograms is desirable. For those who intend to have children, OSHA recommends keeping exposure below 30.
  - OSHA's regulation for lead in construction applies to all jobs that might have employment-related exposure to metallic lead, inorganic lead compounds and organic lead soaps. OSHA specifically mentions the risk of exposure when work involves the following:
    - Demolition or salvage of structures with lead or lead-containing materials
    - Removal or encapsulation of materials containing lead
    - Construction, alteration, repair or renovation of structures, substrates or portions thereof that contain lead or lead-containing materials
    - Installation of products containing lead
    - Lead contamination/emergency cleanup
    - Transportation, disposal, storage, or containment of lead or lead-containing materials at a construction site
    - Maintenance operations associated with these construction activities for both construction and general industry, OSHA sets not just a permissible exposure limit, but what it calls an action level for lead. If employees are exposed to 30 micrograms of lead in the air over an eight-hour workday, without wearing a respirator, employers must meet various OSHA regulatory requirements. These include the following:
      - Monitoring the air around affected employees to determine lead levels
      - Giving blood tests to affected employees to determine blood lead levels

- Providing a thorough medical exam before assigning an employee to a lead-containing area
- Initiating efforts to reduce employee exposure

- The frequency of air monitoring and blood tests varies depending on the levels of lead in the work area and the results of previous blood tests. Employers must take air samples every three months to monitor the exposure of employees who work in areas where lead is at or above the PEL. If exposure is at or above the action level for 30 or more days per year, an affected employee's blood must be tested for lead at least every 6 months. If blood tests show that the employee has 40 or more micrograms of lead per 100 grams of whole blood, the employee will have to have a blood test every 2 months as well as a detailed medical exam at least annually.
- The blood sampling and monitoring should be conducted every 6 months until 2 consecutive blood samples and analysis are acceptable. Any employee with elevated blood levels should be temporarily removed. The sampling and monitoring should be performed at least monthly during the removal period. Employees should be notified in writing within 5 days when lead levels are not acceptable. The standard requires temporary medical removal with Medical Removal Protection benefits.
- A medical surveillance program is available for all employees who are or may be exposed above the action level for more than 30 days. Medical examinations and procedures shall be performed by or under the supervision of a licensed physician. Medical surveillance is provided without cost to employees. If the initial determination or subsequent air monitoring reveals employee exposure to be at or above the action level but below the PEL, the employer shall repeat air monitoring in accordance with this paragraph at least every 6 months. The employer shall continue air monitoring at the required frequency until at least 2 consecutive measurements, taken at least 7 days apart, are below the action level at which time the employer may discontinue monitoring for that employee.
- Affected employees shall be notified of the results of any monitoring performed within 15 working days, either individually in writing, or by posting the results in an appropriate location that is accessible to affected employees. Whenever the results indicate that the representative employee exposure, without regard to respirators, exceeds the PEL, in the written notice shall be included a statement that the PEL was exceeded, and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.
- Because construction workers tend to do short-term jobs with potentially high levels, OSHA requires even more frequent blood tests for them.
- OSHA also requires a medical exam for any employee who works around lead and has symptoms associated with lead exposure or has trouble breathing during a respirator fit test.
- OSHA also requires an employee's temporary removal from a lead-exposed job situation when any of the following apply:
  - Use of engineering controls, protective clothing, respirators, etc., will not bring blood lead levels down
  - Blood lead levels average at or above 50 micrograms per 100 grams of whole blood in a series of tests
  - A medical exam places the employee at increased risk of "material impairment of health" due to lead exposure.

- **Protection Against Hazards:**
  - Training:
    - Edgerton will provide the requisite training to ensure that our employees acquire an understanding of the kinds of monitoring, testing, and protective measures required by OSHA's lead regulations. These standards are designed to protect anyone who could be exposed to lead from suffering serious health consequences.
    - All employees who have a reasonable potential for exposure to airborne lead above the OSHA AL shall receive training. The training shall be performed prior to initial

assignment and shall be repeated annually. The training shall include the content of the lead standard, the sources and types of exposure to lead in their workplace, personal protective equipment use, health hazards of lead, respirator use, medical surveillance, and appropriate engineering controls and work practices. Documentation will be kept in the employee's file.

- Construction industry employers must also have a written compliance plan before they start jobs where employee exposure to lead, without respirators, may exceed the PEL.

- Signage:
  - To make sure that all employees, regardless of industry, are aware that they are entering areas where lead exposure exceeds the PEL, warning signs shall be posted. Employees must abide by any signs, labels, or assessment reports that indicate the presence of lead or lead-containing materials. Appropriate work practices should be followed to ensure the lead-containing materials are not disturbed.
  - OSHA also requires that these areas be clearly labeled with signs that say (at a minimum):

"WARNING – LEAD WORK AREA – POISON! NO SMOKING OR EATING"

- Engineering Controls – Ventilation:
  - Ventilation is one common protection against overexposure to airborne lead. It may be provided by a mechanical system used with enclosures or in containment situations. Or it may be a local portable ventilation system.
  - Shrouded tools with ventilation are another option. OSHA requires that when ventilation is used to control exposure, employers must measure the ventilation system's effectiveness at least every three months.
- Administrative Controls – Job Rotation:
  - Another way to reduce lead exposure is to rotate jobs so that everyone has less exposure to lead. If this type of administrative control is used, employers must keep records documenting who is rotated, where, and when.
- Personal Protective Equipment (PPE) – Respirators
  - OSHA requires the use of personal protective clothing and equipment, including respirators, in an effort to keep an individual's exposure to lead at a safe level.
  - Respirators are required when ventilation, job rotation, and other engineering and administrative controls aren't enough to reduce lead exposure below the PEL. OSHA also gives an employee the right to request a respirator even if lead levels do not require one.
  - OSHA explains just what types of respirators must be used to provide the needed level of protection for different tasks. In addition, OSHA requires employers to train employees to select and use respirators and to conduct fit-testing programs. It is essential that the respirator fit properly to make sure that contaminated air does not get in. The regulation, which recognizes that not everyone can work effectively while wearing a respirator, goes into more detail on respirator fit-testing and selection.
  - The lead regulation for construction breaks jobs down into 3 respirator-type categories, based on the level of exposure associated with each type of job. Unless testing has proved otherwise, employers must assume that these tasks generate sufficient lead levels to require respiratory protection. In addition, employees must also be provided with other types of protection, including PPE, change areas, hand-washing facilities, training, and blood tests.
  - A half-mask air-purifying respirator is required when performing tasks with the lowest levels of lead exposure above the PEL. These tasks include:
    - Using a sledgehammer or similar tool to manually demolish walls or

other building components coated with lead-based paint
- Manual scraping and sanding of a surface with lead-based paint
- Using a heat gun to melt lead paint on a surface prior to scraping
- General cleanup in areas containing lead
- Removing dirt, scale, or paint from structures with lead-based paint using power tools with dust collections systems. These tools might include grinders, brushes, needle guns, or sanders
- Spray painting

▪ A powered air-purifying respirator is OSHA's choice for tasks with the next highest levels of lead exposure. These include:
- Repainting, repairing, or relining high-pressure acid tanks lined with specialized tile or lead brick held in place with lead-containing mortar or grout.
- Lead turning that uses torch melting or fusing of lead or alloyed lead to another lead object
- Removing dirt, scale, or paint from lead-based painted structures with power tools that do not have dust collection systems
- Cleaning up after blasting with dry expendable abrasives on structures with lead-based paint
- Moving or removing the enclosures within which abrasive blasting is performed. These enclosures usually have quite a bit of lead residue.

▪ An air-supplied respirator is needed for the jobs that risk exposure to especially high levels of lead in the air. These include:
- Abrasive blasting with sand, steel grit, steel shot, aluminum oxide, etc.
- Using an acetylene torch or arc welder to weld, cut, or burn on steel structures that have coatings of paint containing lead

▪ Respirators are a crucial part of an employee's protection when they work in areas with high lead levels. No matter what type of work an employee does, OSHA states that respirator filters can be changed at any time they feel an increase in breathing resistance. An employee can also leave the work area to wash their face and respirator face piece whenever necessary to prevent skin irritation.

▪ Any employees who work on jobsite where there are multiple contractors, and there is a concern for lead exposure, will be protected from the hazard.

○ Personal Protective Equipment (PPE) – Clothing:

▪ OSHA requires employers to provide protective clothing at least weekly, and employees are required to wear it. In areas with exposure more than 4 times the PEL without a respirator, an employee will get clean protective clothing daily. In any case, protective clothing may include the following:
- Coveralls or similar clothing
- Gloves, hats, shoes, or disposable shoe covers
- Face shields, vented goggles, or other appropriate protective equipment

▪ To make sure the protective clothing does its job and does not create other problems, employers must repair, replace, clean, launder, and dispose of protective clothing in a way that does not spread the lead contamination around. Gloves, hats, vented goggles, shoes, or disposable shoe covers shall be provided. Protective clothing shall be clean, laundered, or replaced at least weekly. Clothing shall also be properly disposed of and repaired or replaced as necessary.

▪ An explanation of lead hazards must also be provided to those responsible for cleaning or laundering the protective clothing. In addition, disposal or laundry containers must be labeled as follows:

CAUTION: CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD-CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.

- **Safety Procedures:** Even though the various regulations regarding overexposure to lead provide a variety of protection, each employee must do their part too, in order to reduce the chances of developing lead-related health problems.
    - Wear Required PPE: Employee must use the respirators and protective clothing that is assigned to them when working in areas that contain, or may contain, lead. Edgerton provides the specified PPE to our employees at no cost. Employees are to check that PPE is in good condition before each use, and then remove it according to regulations to prevent the spread of contamination.
    - Good Hygiene:
        - Never take food, beverages, tobacco products, or cosmetics into work areas where lead exposure is possible. Employees must wash their hands carefully before handling any of the above items or the like.
        - To further reduce the possibility of spreading lead contamination, employers are required to provide showers, change rooms, and lunchrooms for workers exposed to airborne lead above the PEL. Employees are to use these facilities. In other words, when working with lead, employees are not to just sit down in the work area and eat lunch. At the end of their shift, employees are not to just change clothes and go home.
        - Before eating anything, employees must wash their hands and face, remove contaminated work clothing or have it vacuumed or cleaned of surface dust. Never remove lead from protective clothing by blowing or shaking.
        - At the end of the work shift, employees must remove their contaminated work clothing according to these rules, shower, and leave the work clothing in the changing area. In the changing area, clothing and personal clothing are to be stored in separate areas so employees don't take lead dust home with them.
    - Good Housekeeping
        - OSHA standards mandate that all surfaces be maintained as free from lead or lead dust accumulation as practicable.
        - OSHA recommends the use of vacuums with HEPA filters to clean up floors or other surfaces. Employees should not use compressed air. Employees should not shovel, brush, or use dry or wet sweeping unless vacuuming has been tried and found not to work well.

7.0 Training

- All Employees whose duties create the potential for exposure to lead will receive awareness training consistent with this Policy.

8.0 Recordkeeping

- All lead-related medical records will be saved as required by law.

9.0 Related Documents

- Respiratory Protection policy
- Personal Protective Equipment policy

EDGERTON

Policy / Procedure: **Medical and First Aid**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company will provide and ensure employees have access to medical services and first aid under OSHA 29 CFR 1926.50 and 29 CFR 1910.151. The Company also requires that emergency services is contacted whenever an employee is stung by a bee or wasp, to ensure the ultimate safety of that employee.

2.0 Purpose/Scope

This Policy defines the minimum requirements and responsibilities for providing uniform medical services and first aid to company employees exposed to or suffering from occupational injury or illness. It also defines mandatory response procedures.

3.0 Responsibilities

- Company **Supervisors** are responsible for the day-to-day implementation of and compliance with this policy.

- **Safety Representatives** are responsible for understanding and implementing this policy, including but not limited to ensuring the appropriate medical response is provided for employees are exposed to occupational injuries and illnesses.

4.0 General Procedures

- **Transportation and Communication:**
  - When a medical facility is not reasonably accessible (within five miles), a person trained to render first aid, holding a valid certificate in first aid training obtained from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence, and first aid supplies must be available at the worksite.
  - Proper equipment for prompt transportation of an injured person to a physician or hospital, or a communication system for contracting necessary ambulance services, will be provided.
  - In areas where 9-1-1 is not available, the telephone numbers of local physicians, hospitals, and/or ambulances must be conspicuously posted at all jobsites.

- **Medical Services and First Aid:**
  - Medical personnel will be made available for advice or consultation to any employee exposed to an occupational injury or illness.
    - Local medical services for medical evaluations will be arranged by a Safety Representative for any employee exposed to an occupational injury or illness.
  - A first aid kit will be available at all job sites and offices. The first aid/CPR providers will be made aware of the location of the first aid supplies and will have access to the contents.
  - First Aid kits shall consist of appropriate items which will be adequate for the location in which they are used. For construction operations, items shall be stored in a weather-proof container with individual sealed packages of each type of item.
  - Supervisors and Safety Representatives will ensure the availability of adequate first aid supplies and periodically reassess the demand for supplies and adjust inventories as needed. For construction operations, first aid kits shall be checked before being sent out to each job and at least monthly.

- **Emergency Showers and Eyewash**: Suitable facilities shall be provided for quick drenching or flushing of eyes or body where the eyes or body if any person may be exposed to injurious corrosive materials. These facilities will be provided when necessary based on the scopes of work and materials used.

- **Bee and Wasp Stings:**
  - It is the Company's policy that anytime an employee is stung by a bee or wasp while working, emergency medical help shall be summoned right away. **DO NOT WAIT…CALL 911.**
  - The time a person waits to see if they have a reaction is precious time lost. A person who is allergic to bees or wasps can become very ill within just a few minutes, and possibly go unconscious or even die, if they don't receive fast medical care. For precautionary measures, seek medical attention immediately.
  - People that have known allergies to bee stings should always carry their prescription bee or wasp sting kit (EPI-PEN) with them and these people should make sure someone else on the job also knows where this kit is kept.
  - Our intention is not to send everyone that has been stung to the emergency room in an ambulance. For people who have no known allergies to bee or wasp stings, emergency personnel can monitor the person for a reasonable period and if there is no reaction, they can leave. The worker can then go back to work.
  - Regarding an employee refusing medical treatment, this should not influence the decision to call 911. **Calling 911 is MANDATORY.** Emergency services can be on hand and monitor the victim without necessarily providing medical treatment. In fact, if there is no reaction, no treatment is warranted. The idea is to treat the bee sting like an emergency until it becomes clear that it is not.

5.0 Training

- All **Supervisors** shall receive emergency response / CPR training.

6.0 Recordkeeping

- The Safety Department will retain all documents concerning approved occupational medical providers.
- Employees' medical records shall be retained for a duration of employment plus 30 years.

7.0 Related Documents

- U.S. Department of Labor; OSHA; 29 CRF 1926.50 Medical Services and First Aid
- U.S. Department of Labor; OSHA; 29 CRF 1910.151 Medical Services and First Aid

Policy / Procedure: **Spill Control Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The following requirements and guidelines must be followed to ensure proper spill prevention, response, and reporting are implemented at every jobsite where hazardous substances are stored, transported, or handled during Company operations.

2.0 Purpose/Scope

This Program applies to all employees performing services where hazardous or potentially hazardous substances are stored, transported, or utilized during Company operations. The Program aims to provide guidelines to prevent, respond to, and accurately report spills at Company jobsites.

3.0 Responsibilities

- **Shop Personnel** are to understand all hazardous substances stored in their respective shop areas, and implement the requirements of this Program to ensure proper storage, spill prevention, and response procedures.

- All **Supervisors** must be knowledgeable of all hazardous substances stored, handled, or used during Company operations at their respective projects and implement the requirements of this Program to ensure proper storage, spill prevention, and response procedures.

- All **Employees** who store, transport, or handle hazardous substances must be familiar and comply with the requirements of this Program.

4.0 General Guidelines

- All hazardous substances, including chemical wastes, are to be managed in a way that prevents release. The following general requirements are to be followed:

- **Container Management:**
  - All hazardous substance containers must be in good condition and compatible with the materials stored within.
  - All hazardous substance containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
  - Empty hazardous substance containers (e.g., drums) must have all markers and labels removed and the container marked with the word "EMPTY".
  - Any spills on the exterior of the container must be cleaned immediately.
  - Flammable materials stored or dispensed from drums or totes must be grounded to prevent static spark. Please see Fire Protection Policy and Flammable and Combustible Liquid Policy.

- **Housekeeping:**
  - All hazardous substances must be stored inside buildings or under cover.
  - Store hazardous substances not used daily in cabinets, or in designated areas.
  - All chemicals that are transferred from larger to smaller containers must be transferred by use of a funnel or spigot.
  - All hazardous substance containers should be closed while not in use.

- Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment.
- Implement preventative maintenance activities to reduce the potential for release from equipment.
- Immediately clean up and properly manage all small spills or leaks.
- Conduct daily inspections of equipment and, as needed, hazardous substance storage areas to ensure leaks or spills are not occurring.
- Use signage to identify hazardous substance storage or waste collection areas.
- Keep all work areas and hazardous substance storage areas clean and in good general condition.

- **Marking and Labeling:**
  - Ensure all hazardous substances are properly marked and labeled in accordance with all federal, state, and local regulations and in compliance with the Hazardous Communication Policy.
  - Ensure that hazardous substances transferred to small containers are marked with the chemicals name (e.g. "OIL") and hazard (e.g. "FLAMMABLE").
  - An inventory must be maintained for all hazardous substances stored in quantity (<55 gallons), and/or a list of locations where non-bulk hazardous substances are stored (flammable lockers).

- **Spill Response:**
  - Spill response equipment must be maintained and located in areas where spills are potentially likely to occur. Spill kits should provide adequate response capabilities to manage any anticipated spill or release. The following general requirements are to be followed:
    - Stock spill clean-up kits that are compatible with the hazardous substance stored on site.
    - Locate spill kits in areas where spills are likely to occur. (Near heavy equipment and locations where hazardous substance are being transferred).
    - Spill kits should be sized to manage an anticipated release (spill equal to the largest container).
    - Emergency response equipment should be inspected periodically to ensure that the spill kit is complete.

- **Emergency spill response:**
  - In the event of a hazardous substance spill or release, immediately take the following measures to keep the spill from entering sewer or storm drains, spreading off-site, spilling into waterways, or affecting human health. In all cases, caution and common sense must be maintained with the primary goal being to prevent and limit personal injury.
    - Stop, contain, and clean up the spill if:
      - The spilled material and its hazardous properties have been identified.
      - The spill is small and easily contained.
      - The responder is aware of the materials' hazardous properties.
    - If a spill or release cannot be controlled or injuries have occurred due to the release, the following procedures should be implemented:
      - Summon help or alert Edgerton's managers and supervisors of the release.
      - Evacuate the immediate area and provide care to the injured. CALL 911.
      - If potential fire or explosion hazards exist, initiate evacuation procedures. CALL 911.
      - Respond defensively to any uncontrolled spills:
        - Use appropriate Personal Protective Equipment when responding to any spill.
        - Attempt to shut off the source of the release, ONLY if it can be done safely.

- Eliminate any source of ignition, ONLY if it can be done safely.
- Protect drains by use of absorbent, booms, or drain covers (if safe to do so).
- Notify any onsite emergency contacts.
- Follow Incident Notification Procedures by notifying a Safety Representative.
- Coordinate response activities with local emergency personnel (fire department).
- Be prepared to provide SDS information to the fire department, EMT, hospital, or physician.

- **Evacuation Procedures:**
  - In the event of a hazardous substance release that has the potential for fire, explosion, or other human health hazards, the following procedures will be implemented:
    - Site workers are to be notified of evacuation.
    - Notification to emergency services will be performed. CALL 911.
    - Site workers will follow pre-determined evacuation routes and assemble at designated areas.
    - Individuals responsible for coordinating evacuations must confirm if the jobsite area has been completely evacuated.
    - Designated emergency response contacts will coordinate all activities with outside emergency personnel.

- **Spill Clean-Up and Disposal:**
  - In the event of a hazardous substance release or spill involving Company employees or equipment, the material must be characterized and then determination must be made as to where and how the material will be disposed of. The clean-up materials (booms, rags, spill pads, plastic bags, etc.) must also be properly characterized and disposed of properly.
  - In the event of a spill of contaminated/hazardous material/waste while in transit to a landfill, the following procedure will occur:
    - The Project Manager and / or Supervisor will be notified by the trucking dispatcher.
    - Local authorities will be notified to assist with traffic control, if necessary.
    - The trucking dispatcher will give spill location information and details.
    - The Project Manager and / or Supervisor will ensure the dispatch of necessary equipment and personnel to the spill location for complete remediation.

- **Spill Reporting:**
  - Immediately contact an Edgerton safety professional. If a hazardous substance spill has been released into the soil, surface water, drains, or the air.
  - The Company will comply with all federal, state, and local rules for reporting and recording any hazardous substance spills.

5.0 Training

- All employees will be familiarized with the requirements of this Program.

6.0 Recordkeeping

- Spill incidents shall be documented pursuant to Incident Notification Procedures.

7.0 Related Documents

- Hazardous Communication policy

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Vehicles and Mobile Equipment

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Policy / Procedure: **Aerial Work Platforms**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company provides the following guidelines to ensure safe work practices by and around operators of Aerial Work Platforms (AWP), that operators possess the appropriate training and experience to operate AWPs; and that AWP's are properly inspected and maintained for safe operation.

2.0 Purpose/Scope

This Policy applies to all employees who operate, inspect, maintain, or perform work near the operation of AWP's.

3.0 Definitions

- Qualified Operator (AWP): An individual who possesses training from a Qualified Instructor, or who otherwise possesses the requisite credentials, to operate an AWP.

- Qualified Instructor (AWP): An individual who, by knowledge, training, and experience, has the authorization and training tools to train and evaluate employees as aerial work platform operators.

4.0 Responsibilities

- **Safety Representatives** for the location where AWP's are utilized are responsible for the following:
  - Ensuring AWPs are inspected and maintained by qualified personnel.
  - Ensuring modifications are approved or done by the manufacturer.
  - Secure all manuals in weather-resistant compartments.
  - Ensure only properly trained operators use units.
  - Ensure all units are properly maintained

- **Qualified Operators:**
  - Immediately remove from service any unsafe units.
  - Follow recommended safe operating procedures.
  - Be trained in the unit and understand safe operating procedures.
  - Perform equipment and workplace inspections.
  - Follow recommended safe operating procedures

5.0 General Procedures

- **Equipment Requirements:**
  - All AWP's used by Company personnel must meet requirements established by government regulation or applicable equipment / manufacturer standards.
  - All AWP's must retain all nameplates, markings, loading charts, and other manufacturer details present on the equipment when received, and must be always equipped with the manufacturer's operating manual.
  - No modifications to an AWP shall be made without approval from the equipment manufacturer and must be performed by qualified and authorized personnel.

- **Operation of Equipment:**
  - AWP's must only be operated by Qualified Operators.
  - Units with safety defects or malfunctions are not to be operated. If the AWP is found to be defective or suspected to be defective or malfunctioning at any time, the operator must remove the AWP from service.
  - Employees must use fall protection, including harnesses, when operating AWP, except when working near or over water. Individuals must always keep all body parts within the AWP during operation.
  - Stunt driving and horseplay is prohibited.
  - The AWP should be parked in a designated parking area, if provided, with platform lowered.
  - AWP's should only be operated in areas with safe clearance and should never be operated under or close to electrical lines. The operator should always ensure a safe path of travel for AWP operation.
  - Disabling or altering interlocks and safety devices IS FORBIDDEN.
  - The AWP must not be driven on grades, side slopes or ramps exceeding those rated by the manufacturer.
  - Maintain 3 points of contact when ascending and descending from the unit.
  - Before getting off the AWP, turn off the motor and set the hand brake.
  - When an AWP is left unattended, the platform shall be fully lowered, controls neutralized, power shut off and the brakes set.
  - AWPs shall be operated at moderate and safe speeds. SLOW DOWN when making turns or while driving near pedestrians and keep safe clearance from any pedestrian or fixed objects.
  - Horns are to be sounded: When backing (unless the unit is equipped with a back-up alarm), when making short turns in congested areas, when approaching blind corners, and any other time necessary for safe operation. Always look in the direction of travel. Utilize spotters when necessary.
  - A flagger is required when crossing railroad tracks. Before crossing railroad tracks, "STOP", make sure the way is clear, then proceed with caution. When crossing tracks, hold the steering mechanism firmly.
  - Test the brakes before driving down ramps or slopes.
  - DO NOT allow anyone to stand or pass under the elevated portion of the unit, whether loaded or empty.
  - The gate or chain will remain closed and secured except when accessing or exiting AWP.
  - Distribute load properly per manufacturer recommendations—do not use planks, ladders, or other devices to achieve a greater working height.
  - AWP shall not be loaded in excess of its rated load or used in a manner that affects its stability or endanger workers.
  - Do not position the lift against another object to steady the AWP.
  - The platform must not be used as a crane.
  - The AWP must not be operated from a position on trucks, trailers, railway cars, floating vessels, scaffolds, or similar equipment, unless the use is approved in writing by the manufacturer.
  - Smoking and vaping is not allowed when operating any equipment.
  - The use of a cell phone is not permissible while the unit is in use.

- **Work Area and Path Assessment:**
  - Prior to moving the AWP into areas off of intended vehicle paths, the operator should perform a walk down of the travel path to identify any hazards, including:
    - Poor lighting; drop-offs, holes, or bumps; debris; slippery surfaces or spills; overhead hazards; etc.
  - AWP operators must avoid high voltage areas and keep a Minimum Safe Approach Distance as follows:

VOLTAGE	FEET
To 300v	Avoid Contact
300v to 50kv	10
50kv to 200kv	15
200kv to 250kv	20
350kv to 500kv	25

- Spotters should be utilized when operating an AWP in congested areas; when the operator has no clear view of the crawler portion of the unit; or when necessary to ensure the safe operation of the unit.

6.0 Inspections and Maintenance

- AWP's must be inspected prior to each work shift by the operator or designated person. Inspections should be carried out using the Equipment Inspection process for all equipment.
- Prior to use, the operator must perform a pre-use function test to ensure proper operation, including operating ground and platform controls to ensure proper functionality.
- Units that are not in safe operating condition must be removed from service. Operators must notify their immediate Supervisor or Safety Personnel of any AWP that is not in safe operating condition.
- Maintenance or repair of AWP's must only be performed by authorized and qualified personnel and in conformance to manufacturer recommendations.

7.0 Training

- Qualified Operators must be trained to show proficient knowledge in the inspection and operations of AWP's, including the following proficiencies:
  - Identify operator's manual compartment.
  - Conduct a "Pre-Operation Inspection".
  - Conduct functions test and discuss "Critical" items.
  - Discuss all decals, warnings, cautions, and instructions.
  - Demonstrate and perform Emergency Machine Functions.
  - Operator must demonstrate proficiency in operating the unit.
- Refresher Training should be provided as required by applicable regulation or annually.

8.0 Recordkeeping

- Maintenance and inspection records will be retained for 3 years.
- Qualified Operator training records will be retained by the Safety Department.

9.0 Related Documents

- Fall Protection policy

Policy / Procedure: **Driving Safety**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company promotes the safe use of motor vehicles during all Company related activities by requiring that all employees operating Company owned or leased vehicles, or employees operating personal vehicles for use during Company operations, adhere to minimum driving safety requirements as outlined below.

2.0 Purpose/Scope

This policy applies to all Company owned / leased vehicles, employee-owned vehicles that qualify for reimbursable allowance, and the drivers of those vehicles. These practices apply to all those employees who drive a vehicle on behalf of the company.

3.0 Responsibilities

It is the responsibility of all Edgerton employees who operate an Edgerton owned vehicle to comply with all Edgerton guidelines and procedures. It is also their responsibility to report any misuse of an Edgerton owned vehicle immediately to Edgerton management. Further, all Edgerton employees must also report any accident or injury immediately to Edgerton management.

4.0 General Procedures

- **Authorized Use:** The Company may grant or assign the use of a Company owned or leased vehicle to an employee on a discretionary basis. Company owned or leased vehicles can be driven while performing company business. Employees who are assigned a Company owned or leased vehicle are permitted to use them to commute to and from their assigned work reporting location or authorized locations to conduct Company business.
  With approval, the Company may grant or authorize an employee use of a Company owned or leased vehicle for use outside company business.

- **General Safety and Requirements:** the following are minimum requirements for the safe operation of motor vehicles for work purposes:
  - Abiding by all federal, state, and local traffic laws and rules of the road.
  - Employees who operate their personal motor vehicle for company business are required to carry private insurance for that vehicle, meeting any minimum insurance coverage required in the jurisdiction in which they operate.
  - All vehicles will bear a current registration and insurance card as proof of coverage for that vehicle.
  - Maintaining the appropriate valid driver's license and certifications or endorsements for all classes of vehicles operated.
  - Completing any required training for the vehicle operated.
  - Operating any company vehicle while impaired on drugs or alcohol is strictly prohibited. Any prescribed drugs that may affect the ability to drive must be reported to a Direct Supervisor.
  - No unauthorized riders are allowed as passengers.
  - No person shall be authorized to operate a Company owned or leased vehicle as a permissive driver unless expressly authorized to do so by Company management.
  - Employees shall not use handheld cell phones and/or other electronic devices while operating a motor vehicle. Any vehicle should be brought to a complete stop before initiating use of a hands held device.

        - Note that use of hands-free devices is acceptable if allowed by the laws of the state in which the vehicle is operated.
    - Any cargo on or in motor vehicles shall be adequately stored and secured to prevent unintentional movement of the equipment that could cause spillage, damage to the vehicle, or injury to the operator.
    - Drivers should perform pull-through parking when available, or back into a parking space if necessary.
    - All persons driving or riding in a vehicle during the course of their employment or while on company business shall wear seat belts.
    - Employees are responsible for performing inspections, as necessary, of vehicles prior to operation.

- **Motor Vehicle Accidents:**
    - All motor vehicle accidents that occur while on company business and all accidents involving company vehicles shall be reported immediately pursuant to the Company's Incident Notification Policy and Procedure.
        - Employees are also required to report any incident they are involved in operating a personal vehicle while conducting company business.
    - All motor vehicle accidents are considered Incidents subject to post-accident drug and alcohol screening.
    - Persons involved in Incidents that result in damage to a vehicle or mobile equipment are subject to disciplinary action, which may include attendance at a driver's education course.

- **Motor Vehicle Citations:**
    - Employees who receive any citation arising from the use or operation of their private vehicles are responsible for paying any fines or forfeitures.
    - Employees operating Company owned or leased vehicles are responsible for the condition of the vehicle they operate and all material that it is carrying. Employees who are ticketed for having defective equipment on the vehicle, being
    - overloaded, or for any moving violation will be personally responsible for paying fines imposed.

- **Maintenance and Inspection:**
    - All Company owned or leased vehicles will be maintained as specified by the manufacturer's manual.
    - Employee's operating Company owned or leased vehicles are responsible for performing inspections, as needed, prior to operation to ensure functionality of all lights, turn signals, windshield wipers, tires, horns, flashers / construction lights.
    - It is the responsibility of the employee to notify the Company of any safety defect or operational issue with a Company owned or leased vehicle he or she operates.

- **Motor Vehicle Report / Record Checks:**
    - Upon hire, the Company will obtain and review a driving record on all employees who operate company owned or leased vehicles or whose job duties require significant vehicle travel. These employees may also be subjected to random driving audits performed by the Company's insurance carriers.
    - The Company or its insurance carrier reserves the right to revoke, restrict, or limit driving privileges based on an employee's driving record.
    - The Company reserves the right to revoke use of Company owned or leased vehicles, or place restrictions or prohibitions on the use of Company owned or leased vehicles, if an employee's driving record meets the following criteria:

- More than two (2) minor violations in the immediate three (3) year span. This includes regular speeding, disregarding traffic controls, failure to yield, or other non-reckless or aggravated moving violations.
- More than one (1) major violation in the immediate three (3) year span. This includes driving or operating under the influence (DUI / OWI), major speeding violations, reckless driving, leaving the scene of an accident, etc.
- More than one (1) at fault accident in the immediate three (3) year span.

- The Company retains discretion to implement necessary prohibitions or restrictions if the above criteria are met for any employee.

5.0 Record Keeping

- All records related to the investigation of any Incident involving the use of a motor vehicle shall be documented in the appropriate Incident File and / or Employee Personnel File, including any records related to drug and alcohol screening.
- Training records will also be maintained by Safety, as needed.

6.0 Related Documents

- Incident Notification Policy and Procedure

Policy / Procedure: **Equipment and Vehicle Inspections**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

All Company employees are required to perform a pre-use inspection on all equipment and vehicles to ensure they are free from defects or mechanical issues, equipped with all required safety mechanisms, and safe for their intended operation.

2.0 Purpose/Scope

This policy outlines the general requirements for mandatory pre-use inspections for equipment and vehicles to ensure all equipment and vehicles are maintained and operated in a safe manner.

3.0 General Procedures

- All vehicles and mechanized equipment shall be inspected at the beginning of each shift or immediately prior to use to ensure that all parts, equipment, and accessories affecting safe operation, are in proper operating condition and free from defects.
    - The inspection should include assessment of any brake or backup lights or alarms, mirrors, and sensors.
    - For construction equipment, the inspection should also include ensuring that the equipment is equipped with an operational fire extinguisher.
- A walkaround inspection should be performed on all vehicles and equipment following fueling, to ensure compliance with appropriate fire protection protocols and to ensure continued safe operations.
- A daily equipment inspection must be completed each day before equipment is operated. Inspections can be completed by using the URL or QR code attached to this Policy.
- All defects that affect the safe operation of the equipment or vehicle must be corrected before the equipment or vehicle is placed in service. All repairs must be performed by a qualified mechanic or other qualified and approved personnel and be completed to meet relevant manufacturer requirements.

4.0 Recordkeeping

- Maintenance and mechanic staff will retain records concerning any repairs or maintenance performed on company equipment.

5.0 Related Documents

- Equipment Inspection QR Code

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Equipment Inspections

Equipment Inspections can be completed by visiting Https://inspect.smartsites.io/inspect or scanning the following QR code:

Scan this QR code to start a new equipment inspection

Policy / Procedure: **Forklifts**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company provides the following guidelines to ensure safe work practices by and around operators of Forklifts, that operators possess the appropriate training and experience to operate Forklifts; and that Forklifts are properly inspected and maintained for safe operation.

2.0 Purpose/Scope

This Policy applies to all employees who operate, inspect, maintain, or perform work near the operation of Forklifts.

3.0 Definitions

- Qualified Forklift Operator: An individual who possesses training from a Qualified Instructor, or who otherwise possesses the requisite credentials, to operate a Forklift.
- Qualified Forklift Trainer: An individual who, by knowledge, training, and experience, has the authorization and training tools to train and evaluate employees as Qualified Forklift Operators.
- Forklift: a mobile power propelled industrial truck (LPG, gas, or electric powered) used to carry, push, pull, lift, stack, or tier materials.

4.0 Responsibilities

- **Safety Representatives** for the location where Forklifts are utilized are responsible for the following:
  - Ensuring Forklifts are inspected and maintained by qualified personnel.
  - Ensuring modifications are approved or done by the manufacturer.
  - Secure all manuals in weather-resistant compartments.
  - Ensure only properly trained operators use units.
  - Ensure all units are properly maintained
- **Qualified Forklift Operators:**
  - Operate equipment in compliance with this Policy and all manufacturer recommendations.
  - Immediately remove from service any unsafe units.
  - Be trained on the unit and understand safe operating procedures.
  - Perform equipment and workplace inspections, including unit inspections prior to each use.

5.0 General Procedures

- **Equipment Requirements:**
  - All Forklifts used by Company personnel must meet requirements established by government regulation or applicable equipment / manufacturer standards.
  - All Forklifts must retain all nameplates, markings, loading charts, and other manufacturer details present on the equipment when received, and must be always equipped with the manufacturer's operating manual.

- Overhead guards must be installed on all lift trucks where loads can be lifted to a height that could permit an object to fall on an operator, or where overhead obstructions may be encountered in use.
- Mast guards must be installed to prevent personnel from reaching into the lifting mechanism. They also prevent the mast chain from entering the operating enclosure should it break.
- All Forklifts must enable the operator to have clear visibility to the top of the load being raised to its highest position. This means that any overhead / weather protection must be clear and clean plexiglass or equivalent. The use of plywood or similar material that blocks operator's view is not permitted.
- Forklifts must only be used in the environment for which they are designed.
- All Forklifts must be equipped with working seat belts, fire extinguishers, horn, brake / emergency brake, back-up alarm, and lights (headlights are required on both front and rear where equipment is to be operated outside at night in unlit areas).
- No modifications to a Forklift shall be made without approval from the equipment manufacturer and must be performed by a qualified and authorized personnel.

- **Operation of Equipment:**
  - Forklifts must only be operated by Qualified Forklift Operators.
  - Units with safety defects or malfunctions are not to be operated. If the Forklift is found to be defective or suspected to be defective or malfunctioning at any time, the operator must remove the Forklift from service.
  - Operators must wear a seatbelt at all times. Seatbelts must not be undone while placing a load for the purpose of standing to improve visibility.
  - Riding as a passenger on any part of a Forklift is strictly prohibited. No person shall ride on the lifting mechanism of a forklift, or use the Forklift as a work platform. A manufacturer approved personnel basket may be used if all stipulations of the manufacturer are met and approved by the Safety Director or Manager.
  - Keep all body parts within the Forklift at all times during operation.
  - Stunt driving and horseplay is prohibited.
  - The Forklift should be parked in a designated parking area, if provided, with forks lowered, tipped forward, and flush on the pad surface to prevent a tripping hazard. In all cases, the truck must be parked so that the forks do not present a tripping hazard.
  - If it is necessary to park on an incline, the drive wheels must be chocked.
  - NEVER step off the Forklift until it has come to a complete stop. Always maintain three points of contact when ascending and descending from the lift.
  - Forklifts should never be driven up to anyone standing in front of a fixed object.
  - Before exiting the Forklift, turn off the motor and set the hand brake. If the Forklift is going to be unattended for 15 minutes or more, the propane cylinder supply valve should be closed (for propane trucks only).
  - When a Forklift is left unattended, loads shall be fully lowered, controls neutralized, power shut off, and brakes set.
  - Forklifts shall be operated at a moderate and safe speed. SLOW DOWN when making turns or while driving near pedestrians.
  - Horns must be sounded: when backing (*unless the unit is equipped with a back-up alarm)*, when making short turns in congested areas, when approaching blind corners, and any other time necessary for safe operations. Always look in the direction of travel.
  - Test the brakes before operating down slopes or ramps.
  - A loaded Forklift should travel on ramps with the load uphill and the mast tilted back toward the cab.
  - When ascending or descending ramps or inclines, do not start turning any portion of the Forklift.
  - Avoid sudden starts and stops; these will cause skidding or toppling of the load.
  - IF the height of the load obscures forward vision, operate the truck in reverse. Never drive blind—get a spotter to assist if needed.

- Loads that extend above the carriage backrest shall not be carried unless no part of the load can slip back toward the operator.
- DO NOT allow anyone to stand or pass under the elevated portion of any Forklift, whether loaded or empty.
- Always make sure you have sufficient head roam when stacking or removing material.
- When traveling, loaded or unloaded, the mast shall be tilted back with the forks carried 6"-10" above the ground. The Forklift shall be fully stopped before raising / lowering forks.
- Smoking or vaping is prohibited while operating a Forklift.
- Cell phone use is strictly prohibited while operating a Forklift.

- **Refueling:**
  - Refuel in designated areas that are well ventilated and away from any sources of ignition.
  - Forklift engines must be turned off. Fuel tanks shall never be filled while the engine is running.
  - Fuel spillage must be avoided. Clean up spills immediately.

- **Inspection:**
  - Forklifts must be inspected prior to each work shift by the operator or other designated person.
  - The inspection should be performed pursuant to the Equipment and Vehicle Inspection Policy.

- **Maintenance and Repair:**
  - Maintenance or repair of Forklifts must only be performed by authorized and qualified personnel and in conformance with manufacturer recommendations.

6.0 Training

- Qualified Forklift Operators must be trained to show proficient knowledge in the inspection and operations of Forklifts, including the following proficiencies:
  - Identify operator's manual compartment.
  - Conduct a "Pre-Operation Inspection".
  - Conduct functions test.
  - Discuss all decals, warnings, cautions, and instructions.
  - Operator must demonstrate proficiency operating the unit through practical training with the unit they will be operating.
- The Trainer shall certify that each operator has been trained and evaluated.
- Refresher Training should be provided as required by applicable regulation or every three years.
  - Refresher Training will be provided to any operator involved in an incident or who is otherwise observed to be misusing equipment.

7.0 Recordkeeping

- Maintenance and inspection records will be retained for 3 years.
- Qualified Forklift Operator training records will be retained by the Safety Department.

8.0 Related Documents

- Driving Safety policy
- Equipment and Vehicle Inspection policy

Policy / Procedure: **Rollover Protective Structures (ROPS)**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company will comply with regulatory requirements concerning the need for rollover protective structures on certain construction equipment, including but not limited to OSHA's Rollover Protective Structures; Overhead Protection regulations in 1926.1001.

2.0 Purpose/Scope

This Policy applies to all equipment covered by OSHA 1926.1001 and other applicable regulations.

3.0 Responsibilities

- The **Shop Superintendent or Manager** is responsible for ensuring that Rollover Protective Structures are equipped on all vehicles as required by this policy and applicable regulation.

4.0 General Procedure

- Rollover Protective Structures (ROPS) shall be installed, pursuant to minimum performance criteria of OSHA, for all rubber-tired self-propelled scrapers; rubber-tired front-end loaders and rubber-tired dozers; crawler tractors and crawler loaders, motor graders, compactors, and rubber-tired skid steer equipment.
- Installation of any ROPS shall comply with manufacturer instructions.

5.0 Recordkeeping

- Equipment records related to this Policy will be maintained in the ordinary course of business for the respective equipment.

6.0 Related Documents

- Equipment and Vehicle Inspection policy

Policy / Procedure: **Skid Steers**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company provides the following guidelines to ensure safe work practices by and around operators of skid steers; that operators possess the appropriate training and experience to operate that equipment; and that skid steers are properly inspected and maintained for safe operation.

2.0 Purpose/Scope

This Policy applies to all employees who operate, inspect, maintain, or perform work near the operation of skid steers.

3.0 Definitions

- Authorized Operator (skid steer): an employee who has been trained and has received permission by supervision to operate a skid steer.

- Authorized Trainer (skid steer): an employee who by knowledge, training, and experience has the authorization and training tools to train and evaluate employees as a skid steer operator.

4.0 Responsibilities

- **Safety Representatives** and **Mechanics Representatives** for the location where skid steers are utilized are responsible for the following:
  - Ensuring skid steers are inspected and maintained by qualified personnel.
  - Ensuring modifications are approved or done by the manufacturer.
  - Ensuring only properly trained operators use units.
  - Ensuring all units are properly maintained.

- All **Employees** who are Authorized Operators of skid steers are responsible for the following:
  - Operating equipment in compliance with this Policy and all manufacturer recommendations.
  - Immediately removing from service any unsafe units.
  - Possessing the required training on the unit and understanding safe operating procedures.
  - Performing equipment and workplace inspections, including unit inspections prior to each use.

- **Shop Superintendent** is responsible for complying with all Maintenance and Repair requirements under this Policy.

5.0 General Procedures

- **Equipment Requirements:**
  - All new skid steer loaders shall meet requirements established in applicable equipment standards, SAE J 1388, CSA standards, or most current version.
  - All nameplates and markings, including load charts, shall remain in place and be maintained in a legible condition. All skid steers will have a manufacturer's operating manual located on the equipment for reference to inspections and safety procedures.

- Overhead guards must be installed on all skid steer units where loads can be lifted to a height which could permit an object to fall on the operator, or where overhead obstructions may be encountered in use.
- All skid steer units must enable the operator to have clear visibility to the top of the load being raised to its highest position. This means that any overhead/weather protection must be clear and clean plexiglass or equivalent. The use of plywood or similar material that blocks operator's view is not permitted.
- All skid steers must be equipped with working seat belts, fire extinguisher, horn, brake/emergency brake, back-up alarm, and lights (headlights are required on both front and rear where equipment is to be operated outside at night in unlit areas).
- No modifications or additions that affect the capacity or safe operation of the equipment shall be made without manufacturer approval. Modifications and additions can only be made by qualified and authorized personnel. If such modifications or changes are made, the capacity, operation, and maintenance instruction plates, tags, or decals shall be changed accordingly

- **Operation of Equipment:**
  - Only those people who have current operator's training will be authorized to operate skid steers. Operators shall be trained in the safe operation of each model of skid steer that they are authorized to operate.
  - Load capacities should be always followed.
  - Always use a spotter or safety monitor when operating a skid steer in a congested area, when paths of travel are not clearly visible, or whenever needed to ensure safe use.
  - Units with safety defects are not to be operated. If the skid steer is found to be defective at any time, the driver must tag out the unit and input a maintenance work order for repairs.
  - All skid steer operators must always wear a seatbelt. Seatbelts must not be undone while placing a load for the purpose of standing to improve visibility.
  - Riding as a passenger on any part of a skid steer is prohibited. No person shall ride on the lifting mechanism of a skid steer or use the skid steer as a work platform.
  - Always keep all body parts within the skid steer during operation.
  - Stunt driving and horseplay are prohibited.
  - The skid steer should be parked in a designated parking area, if provided, with bucket lowered and flush on the pad surface to prevent a tripping hazard.
  - If it is necessary to park on an incline, the drive wheels must be chocked.
  - DO NOT step off the skid steer until it has come to a complete stop.
  - Maintain 3 points of contact when ascending and descending from the unit.
  - Skid steers shall not be driven up to anyone standing in front of a fixed object.
  - Before getting off the skid steer, turn off the motor and set the hand brake.
  - When a skid steer is left unattended, loads shall be fully lowered, controls neutralized, power shut off and the brakes set.
  - Skid steers shall be operated at moderate and safe speeds. SLOW DOWN when making turns or while driving near pedestrians.
  - Horns are to be sounded: When backing (unless the unit is equipped with a back-up alarm), when making short turns in congested areas, when approaching blind corners, and any other time necessary for safe operation. Always look in the direction of travel.
  - Before crossing railroad tracks, "STOP", make sure the way is clear, then proceed with caution. When crossing tracks, hold the steering wheel firmly.
  - Test the brakes before driving down ramps or slopes.
  - DO NOT allow anyone to stand or pass under the elevated portion of the unit, whether loaded or empty.
  - Smoking and vaping are not allowed when operating a skid steer.
  - The use of a cell phone is not permissible while the unit is in use.
  - Ensure you follow right of way requirements if you operate a skid steer over railroad tracks. Use a spotter to cross tracks when required.

- **Entering and Exiting from the Loader Safely:**
  - Enter only when the bucket or other attachment is flat on the ground—or when the lift-arm supports are in place. Use support supplied or recommended by the manufacturer.
  - When entering the loader, face the seat and keep a three-point contact with handholds and steps.
  - Never use foot or hand controls for steps or handholds.
  - Keep all walking and working surfaces clean and clear of debris.
  - Before leaving the operator's seat,
    - lower the bucket or other attachment flat to the ground,
    - set controls to neutral or off position,
    - set the parking brake, and
    - turn off the engine.
  - If you are unable to exit through the front of the machine, use the emergency exit through the roof or across the back.

- **Maintaining the Loader in Safe Operating Conditions:**
  - Follow the manufacturer's instructions for maintaining the loader.
  - Keep the foot controls and the operator's compartment free of mud, ice, snow, and debris.
  - Before servicing the loader,
    - set the parking brake,
    - lower the bucket or other attachment flat to the ground,
    - turn off the engine, and
    - remove the key from the switch.
  - If the machine cannot be serviced with the bucket on the ground, use the lift arm supports recommended or provided by the manufacturer. If the machine is not equipped with lift arm supports, contact the equipment dealer or manufacturer's representative for help in selecting proper supports.
  - Never work on the machine with the engine running unless directed to do so by the operator's manual. Follow the manufacturer's safety recommendations to complete the task. If the adjustments require that the engine be in operation, use two people to perform the task.

- **Inspection:**
  - Skid steers must be inspected prior to each work shift by the operator or designated person.
  - The inspection is to be documented pursuant to the Equipment and Vehicle Inspections.
  - Skid Steers that are not in safe operating condition must be removed from service until repairs can be completed.

- **Repair and Maintenance:**
  - Repairs are to be made by qualified personnel only.
  - Damaged or worn parts are to be replaced with parts equivalent with those used in original design.
  - Skid steers are not to be altered without approval from the manufacturer.
  - Maintenance records will be maintained by the Shop Superintendent.

6.0 Training

- Authorized Operators must be trained to show proficient knowledge in the inspection and operations of skid steers, including the following proficiencies:
  - Identify operator's manual compartment.
  - Conduct a "Pre-Operation Inspection".
  - Conduct functions test.
  - Discuss all decals, warnings, cautions, and instructions.

  - Operator must demonstrate proficiency operating the unit through practical training with the unit they will be operating.
- The Trainer shall certify that each operator has been trained and evaluated.
- Refresher Training should be provided as required by applicable regulation or every three years.
  - Refresher Training will be provided to any operator involved in an incident or who is otherwise observed to be misusing equipment.

7.0 Recordkeeping

- Maintenance and inspection records will be retained for 3 years.
- Training records will be retained by Safety.

8.0 Related Documents

- Driving Safety policy
- Equipment and Vehicle Inspection policy

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Incident Management

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Policy / Procedure: **Incident Notification Policy and Procedure**	Owner: **Safety**	Revision Date: **June 15, 2026**
		Effective Date: **May 1, 2024**

1.0 Policy

All Company employees are required to immediately report to their direct supervisor or a Safety Representative any Incident they witness, discover, or are involved in, no matter the severity. Strict compliance is mandatory.

2.0 Purpose/Scope

This policy applies to all Company employees and outlines the procedures for the timely and accurate reporting of Incidents for response pursuant to the Incident Investigation Policy and Procedure.

3.0 Definitions

- Incident: Any event occurring during work hours, on a worksite, or while conducting work-related activities for the Company (at any time, day or night), or that involves any Company vehicle or equipment, and that results in, or has the potential to result in, personal injury or illness, vehicle damage or loss, Property Damage, or Utility Strike. An Incident also includes any Near Miss.

- Near Miss: An Incident in which no property was damaged, or no injury or illness was sustained, but where, given a slight shift in time or position, damage or injury could have occurred.

- Property Damage: Any Incident resulting in, or having the potential to result in, damage or loss to property owned, leased, or rented by the Company, or any Incident that occurred due to a Company employee causing damage or loss to property owned, leased, or rented by any third-party.

- Serious Injury or Fatality (SIF): A Serious Injury or Fatality (SIF) is any Incident that results in catastrophic injury, including amputation, loss of eye, spinal cord injury, traumatic brain injury, or permanent disability. Permanent disability is defined as any disability that would prevent the injured person from re-entering the workforce in his or her previous or equivalent capacity.

- Utility Strike: Any Incident involving damage to or contact with any utility, even if the utility was abandoned or not live.

4.0 Incident Notification Procedures

- **Emergency Response:** All employees understand that they must immediately notify Emergency Services (9-11) in the event of any Serious Injury or Fatality or any Incident that results in an emergency posing risk of Serious Injury or Fatality to any person.

- **811 Locate**: In the event of a Utility Strike, an emergency locate should be called in to clear that area prior to excavation work commencing.

- **Mandatory Notification Procedures:**

    - *ALL* Company employees are required to report any Incident they witness, discover, or in which they are involved to their direct supervisor or a Safety Representative as soon as possible, but never later than the end of shift during which the Incident occurred or was discovered.

If the initial notification is made to a Supervisor, the Supervisor is required to notify a Safety Representative as soon as possible after receiving notification of the Incident. Violation of these initial notification requirements can result in employee discipline, including termination.

- The Safety Representative is responsible for commencing an appropriate Investigation under the Company's **Incident Investigation Policy and Procedure** and communicating the Incident to the Safety Director as soon as practicable, but no later than the end of day on the date notification of the Incident was received.

- The Safety Director is responsible for sending notification of basic Incident information to the following Company personnel:
  - Chief Executive Officer, President, General Counsel, General Manager, General Superintendents, and Area Managers.

- General Counsel or outside counsel will assess the current information concerning the Incident to determine the need, if any, for Attorney Client, Work Product, or other legal protection over Incident communications and response.

5.0 Additional Response Procedures

- The Supervisor supervising the project at which the Incident occurred is responsible for Stopping Work, if necessary, to ensure that no dangerous conditions or hazards exist that could compromise the continued safety of any person.

- A Safety Representative is responsible for ensuring that all employees affected by an Incident receive the appropriate medical attention, if needed, including completing all tasks required of the **Return-to-Work Policy and Transitional Work Program** and **Incident Investigation Policy and Procedure**.

6.0 Notification to External Authorities

- The Company may have additional requirements for reporting an Incident to governmental agencies (*e.g.*, OSHA) or other external groups (*e.g.*, customer, project owner, etc.) within specific time limits. General Counsel and the appropriate Safety and Operations personnel will assess any Incident that has the potential for required reporting to any external group, prior to making any external notification.

7.0 Recordkeeping

All Incidents are reported and documented in the appropriate document management systems and documented pursuant to the above procedures and related policies and procedures.

8.0 Related Documents

- Incident Investigation Policy and Procedure
- Return to Work and Transitional Work Program
- Stop Work Authority policy

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Policy / Procedure: **Incident Investigation Policy and Procedure**	Owner: **Safety**	Revision Date: **June 15, 2026**
		Effective Date: **April 1, 2024**

1.0 Policy

Company Safety or Legal personnel will investigate all Incidents in proportion to their severity and pursuant to the following procedures to identify and preserve evidence and (when necessary) determine a root cause and identify appropriate corrective actions.

2.0 Purpose

This policy is intended to ensure uniform and thorough investigation of and response to all Incidents, identify and track Incident trends to prevent recurrence, and comply with applicable reporting requirements.

3.0 Definitions

- Incident: Any event occurring during work hours, on a worksite, or while conducting work-related activities for the Company (at any time, day or night), or that involves any Company vehicle or equipment, and that results in, or has the potential to result in, personal injury or illness, vehicle damage or loss, Property Damage, or Utility Strike. An Incident also includes any Near Miss.

- General Liability: Any Incident resulting in, or having the potential to result in personal injury, vehicle damage or loss, or property damage or loss to a third party.

- Serious Injury or Fatality: A Serious Injury or Fatality (SIF) is any Incident that results in catastrophic injury, including amputation, loss of eye, spinal cord injury, traumatic brain injury, or permanent disability. Permanent disability is defined as any disability that would prevent the injured person from re-entering the workforce in his or her previous or equivalent capacity.

- Utility Strike: Any Incident involving damage to or contact with any utility, even if the utility was abandoned or not live.

4.0 Standard Incident Investigation Procedures

- In tandem with completing notification requirements outlined in the Incident Notification Policy and Procedure, a Safety Representative must investigate, or be involved in the investigation of, ALL Incidents using the following standard procedures:

- **Site Control and Preservation**: the Supervisor overseeing the project where the Incident occurred (if the Incident occurred on a jobsite) is responsible for ensuring the Incident scene remains secured until the Safety Representative completes any necessary on-site investigation or photographs are captured. The Safety Representative should direct the Supervisor, as necessary, to ensure site security.

  If necessary, the Supervisor (or other personnel as directed) should assist the Safety Representative in recreating the Incident scene to help capture the environment and conditions relevant to the Incident.

- **Required Documentation:** The Safety Representative should gather the following documents and information, to the extent available and relevant to the Incident:

- Witness Statements: on the template provided, the Safety Representative will obtain a written statement from each eyewitness to the Incident or individual with knowledge of the Incident or any information relevant to the Incident.
  - The Safety Representative must be present to assist witnesses and ensure the Witness Statement contains sufficient detail.
  - To the extent possible, the witness should complete the Witness Statement form and do so in his or her own words. The witness should sign a Witness Statement regardless of whether he or she personally prepared the statement.

  If there are no witnesses to the Incident, the Safety Representative should document "No Witnesses".
- Photographs or other Pictorial Evidence: the Safety Representative should, if possible, photograph the Incident scene from multiple views and distances (as needed), any equipment involved, and any other tangible evidence involved in or related to the Incident. The Safety Representative should obtain necessary measurements to assist with his or her investigation.
- JHA or Daily Plan Documents: The Safety Representative should obtain a copy of the Job Hazard Analysis (JHA) encompassing the work during which the Incident occurred.

The Safety Representative will gather and maintain any other documents or information relevant to his or her investigation of the Incident.

The Safety Representative will save the above-gathered documents and information in the appropriate document management file for the subject Incident and ensure that all Investigation related materials are uploaded to that file.

- **Evidence Preservation**: The Safety Representative should ensure that any tangible evidence involved in the Incident is sequestered and/or preserved as needed. The Safety Representative should contact Legal to assist with preservation efforts.

- **First Incident Notification**: The Safety Representative will (1) ensure proper notification to the Safety Director pursuant to the Incident Notification Policy and Procedure and (2) create a "New Incident Report" in SmartSites within 24 hours of the Incident occurrence or notification of the Incident.

- **Report on Investigation**: Unless otherwise instructed, the Safety Representative who investigated the Incident should utilize all facts and information gathered during the investigation to complete a Report on Investigation on the template provided.

  A Report on Investigation should be completed as soon as possible following completion of an investigation, with an expected turnaround within one (1) to three (3) days of an Incident. Some Incidents may take less or more time to investigate. The completed Report on Investigation should be saved in the appropriate file for that Incident.

  If necessary, a Safety or Legal Representative may also prepare additional materials to properly document findings, causes, or action items related to an ongoing or completed Investigation.

5.0 Attorney Client Privilege ("ACP") Incident Investigation Procedure

- When General Counsel or other retained legal counsel determines that an Incident response and Investigation requires the need for Attorney Client, Work Product, or other confidentiality or legal protection, the Investigation will be conducted under the authority of and directed to counsel, using the following procedure:
  - A Safety Representative will ensure completion and compilation of the documents and information in Section 4.0 above.

  - A Safety Representative will complete a Confidential Report on Investigation directed to Counsel, in lieu of a standard Incident Investigation Report. All findings contained in the Confidential Report on Investigation shall remain Privileged and Confidential.
- ACP Incident Investigation Procedure applies to all SIFs and Utility Strike Incidents. General Counsel or retained counsel may direct ACP Incident Investigation Procedure for any other Incident as needed, including General Liability Incidents.
- Legal counsel will direct all evidence preservation as needed.
- All materials prepared as part of an ACP Incident Investigation must include a designation identifying the document as "PRIVILEGED AND CONFIDENTIAL" or "ATTORNEY CLIENT PRIVILEGE" or similar designation.
  - Materials prepared as part of an ACP Incident Investigation must not be shared or disclosed without approval from the General Counsel or retained outside counsel.

6.0 Notification to External Authorities

- Edgerton may have additional requirements for reporting an Incident to governmental agencies or other external groups within specific time limits.
- General Counsel and the appropriate Safety and Operations personnel will assess any Incident that has the potential for required reporting to any external group, prior to making any external notification or disclosing any Investigation documents.

7.0 Recordkeeping

All documents prepared as part of a Standard Incident Investigation should be documented in the appropriate document management systems. All documents prepared as part of an ACP Incident Investigation will be retained by a legal representative.

8.0 Related Documents

- Incident Notification Policy and Procedure
- First Incident Notification (on SmartSites)
- Witness Statement (template)
- Incident Investigation Report (template)
- Confidential Report on Investigation (template)

Policy / Procedure: **Incident Recording Policy**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

Edgerton will meet the requirements of OSHA's Recordkeeping Standard. Edgerton will follow this recordability determination process to ensure the timely, uniform, and accurate recording of work-place events as required by 29 CFR 1904.

2.0 Purpose/Scope

This policy applies to all Edgerton employees and its purpose is to provide guidance for the recordability determination process utilized to comply with OSHA's 1904 standard.

3.0 Responsibilities

- **Safety Personnel** are responsible for investigating all Incidents reported to them that occur during work hours, on a worksite, while using Edgerton vehicles or property, or while conducting work-related activities for Edgerton.
- **Supervisors, Project Managers, and craft workers** are responsible for cooperating with Safety's Incident investigation.
- **General Counsel and Director of Safety** are responsible for assessing Incident investigation findings and other available data to determine whether any incident must be recorded under OSHA Recordkeeping Standard 1904. Outside counsel may be utilized on a case-by-case basis.

4.0 General Procedures

- **Incident Investigation:** All incidents shall be investigated following the guidelines in Incident Investigation Policy.
- **Determination of Work Relatedness:** Injuries or illnesses resulting from or aggravated by an event or exposure in the work environment will be considered work related unless an applicable exception is found using the criteria in the table below, and as defined by OSHA standard 1904.5.

1904.5(b)(2)	**You are not required to record injuries and illnesses if . . .**
(i)	At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
(ii)	The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
(iii)	The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, or baseball.
(iv)	The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related.

	Note: If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.
(v)	The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
(vi)	The injury or illness is solely the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.
(vii)	The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.
(viii)	The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).
(ix)	The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

- If the case is non-work-related, it should not be recorded under 1904.

- If the case is determined to be related to the work activity, then it must be determined if the affected employee was supervised by Edgerton or another company as defined in OSHA Rule 1904.31.

  The determination of responsibility is clarified in OSHA FAQ 31-1:

  > *The host employer must record the recordable injuries and illnesses of employees not on its payroll if it supervises them on a day-to-day basis. Day-to-day supervision occurs when "in addition to specifying the output, product or result to be accomplished by the person's work, the employer supervises the details, means, methods and processes by which the work is to be accomplished.*

  If the case is determined not to be the responsibility of Edgerton, General Counsel and/or Director of Safety will coordinate with the responsible employer to ensure the case is recorded only once.

- If a determination of work-relatedness is uncertain, then utilize the recording process outlined in section 9.0 of this policy.

- **Determination of Medical Treatment:**
  - A determination of the appropriate medical response, if any, including first aid and or medical treatment (defined in OSHA standard 1904.7(b)(5) (ii)), will be made by the employee and, if applicable, medical attendant or provider.
  - Safety personnel shall request & compile any relevant medical records and documentation, if possible, to document the medical response provided to the affected employee, if any. Medical records are a source of best evidence for determining whether Medical Treatment was rendered.
  - After the injured party has received appropriate first aid or medical treatment, the appropriate personnel will determine OSHA recordability based on the treatment received by the employee in accordance with OSHA 1904.7.

- Determination of OSHA Restricted Duty or Job Transfer Status

  - After the injured party has received appropriate first aid or medical treatment, a determination of transitional duty may may be made. The employee will not be expected to perform any duties other than those described on appropriate return to work documentation.
  - Any transitional duty will be evaluated for determination of OSHA Restricted Duty or Job Transfer classification.
  - OSHA defines "restricted duty" as follows:
    - "Restricted work occurs when, as the result of a work-related injury or illness:
      - You keep the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work; or
      - A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work."
  - OSHA defines "routine functions" as:
    - "For recordkeeping purposes, an employee's routine functions are those work activities the employee regularly performs at least once per week."
  - If, while managing an employee's work-related injury/illness case, their routine job functions are impacted by limitations placed on them by their treating physician or their functions are limited by supervision, the case will be recorded as a Restricted Duty Case.
  - If, while managing an employee's work-related injury/illness case, their routine job functions cannot be performed due to limitations placed on them by their treating physician or by determination of their supervision, however the employee can be placed in another job role during this period, the case will be recorded as a Job Transfer Case.

- **Determining Day Counts for Terminated Employees:**
  - When an employee currently on Restricted Duty, Job Transfer, or Day Away from Work status is terminated for reasons wholly unrelated to the event that resulted in the injury or illness, the day count is stopped on the day of termination.
  - When an employee currently on Restricted Duty, Job Transfer, or Day Away from Work status is terminated for reasons that are related to the event that resulted in the injury or illness (safety rule violation, failed post-accident drug screen, etc.), the day count is continued to the employee's estimated medical release date related to the work limitations.
  - When an employee is terminated and is still under treatment for a work-related injury or illness, if after the date of termination, the employee becomes medically restricted or removed from work activity completely, the case status needs to be changed to reflect either Restricted Duty or Day Away from Work status and a count of 1 day added to the 300 log.

5.0 Recording Cases

- Cases that clearly satisfy the recording requirements of OSHA Rule 1904 will be appropriately recorded on the site OSHA 300 log within 7 days of final determination.

- Suspicious, or otherwise questionable cases will be internally reviewed by the General Counsel and Director of Safety—with advice of outside counsel on a case-by-case basis. All facts available must be made available for formal review.

- Recordability determinations will be made following a thorough investigation of each Incident and detailed review of investigation materials, including any reports, witness statements, and photographs / videos or other tangible evidence, with reasonable reliance on additional materials needed to inform the decision, including worker's compensation reports and records, third party

incident reports, time and attendance records, contracts and other scope-of-work or project documents, and applicable medical records. Recordability determinations must be made on the best evidence available.

- Recordability under OSHA 1904 will be confirmed by the General Counsel and Director of Safety with appropriate assessment by outside counsel when necessary.

6.0 Recordkeeping

- Incident investigation documents and related materials concerning the recordability determination of any Incident will be maintained in SmartSites.
- Confidential documentation, if any, will be maintained by the General Counsel.

7.0 Related Documents

- Incident Investigation Policy and Procedure
- OSHA 1904

8.0 Attachments

- Recordkeeping Determination Flowchart (OSHA)

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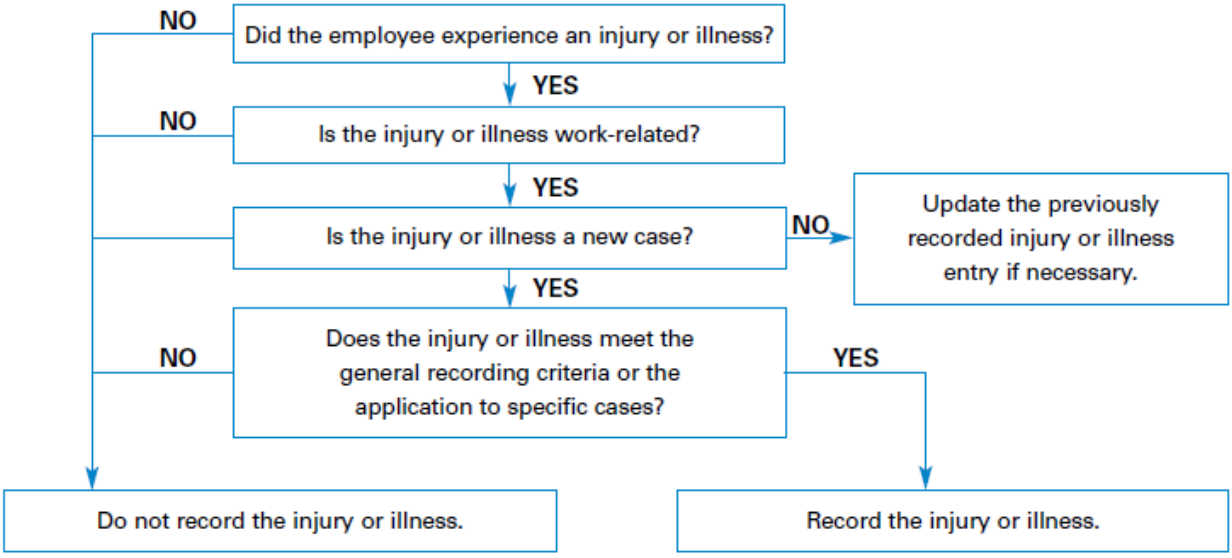
OSHA Recordkeeping Determination



Policy / Procedure: **Return to Work and Transitional Work Program**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

Edgerton will utilize the following steps to successfully manage occupational injury or illness cases with the goal of protecting injured workers and restoring them to optimal health and well-being as quickly as possible. As part of this process, Edgerton will implement a mandatory Transitional Work Program to provide reasonable and suitable transitional duties for employees who suffer occupational injury. The keys to this policy include:

- Immediate and timely care of all worker injuries or illness.
- Use of a first-rate medical provider that understands the value of return-to-work.
- Development of transitional and alternative duty work assignments through employee involvement.
- Safety department case management of an injured employee and the ongoing management of this program. This will be done by working with senior management, supervisors, injured employees, medical professionals, and insurance and broker personnel.
- Periodic monitoring of this program for continual improvement.

2.0 Purpose

To ensure that first-rate care is provided to Company employees suffering occupational illness or injury, provide competent oversight and management of occupational injury or illness cases, and ensure that injured employees are restored to optimal health and well-being in an efficient and effective manner.

3.0 Definitions

- Transitional Work: Temporary work assignments designated to facilitate a return to regular work, which are not intended to become permanent work accommodations as described under the Americans with Disabilities Act.

4.0 General Procedures

- **Mandatory Participation:**
  - Subject to local laws and regulations, all Company employees are required to participate in the Return to Work and Transitional Work Programs. Refusal to participate may impact an employee's right to Worker Compensation benefits or other insurance benefits to which they may be entitled.
  - All employees will be required to review and acknowledge the Company's "Return-to-Work Policy & Procedure Affirmation", attached hereto.
  - Transitional Duty allows our employees to maintain their regular average wage stability, maintain their union benefits, stay in contact with our Company, stay productive, and remain a part of the team.

- **Immediate Response:**
  - Supervisor or Safety Representative should immediately contact the Safety Director to report any occupational injury, regardless of how minor, that has the potential of requiring offsite treatment or medical care beyond first aid.
  - Supervisor or Safety Representative should provide transportation to and accompany the injured employee at the medical facility for post-Incident care. Edgerton utilizes Concentra as its established occupational medical provider.
  - Supervisor or Safety Representative should provide the attending medical provider with

a copy of the "Health Care Provider Medical Care Form" so the provider can evaluate the employee's ability to return to work with or without restrictions. Every injury will be handled on a case-by-case basis.
    - If the employee can return to work either in a full duty or restricted duty capacity, Safety Representative should review the duties being offered and restrictions with the employee and his/her immediate supervisor. Both the employee and the supervisor must understand that variance from the restrictions will result in disciplinary action.

- **Continuing Management:**
    - If the employee is losing time from work, a Safety Representative should stay in regular contact with the employee to stay familiar with his/her condition and needs. Also, keep in contact with the treating physician to review the workers progress so the doctor can periodically evaluate the employee's ability to return to work with or without restriction.
    - Once placed on modified work, the Safety Representative should monitor the employee's progress to ensure compliance with restrictions and modified duties, and that the employee is tolerating his or her new assignments appropriately. All concerns should be dealt with immediately and updates recorded in the appropriate injury incident file. One of the keys to a successful injury management program is maintaining close, personal contact with injured employees throughout the recovery process.
    - When a worker is returned to full duty, notification shall be sent to the employee's supervisor and the Company's relevant insurance company representative.

- **Administrative Considerations:**
    - The Company does not offer modified work to any employee who did not suffer a confirmed work- related injury while working for Edgerton without discussion between the Safety Director, General Counsel, and relevant insurance professionals.
    - Any employee returning from a non-work-related injury must provide a full work release from his or her treating physician stating that the worker is fit for full regular duty based on a review of his job description and physical demands.
    - Where a "preferred provider" relationship has been set up with a health care provider, like Concentra, Safety Director and General Counsel will review preferred options for treatment every six to twelve months. This will ensure that medical staff are aware of the Company's needs and ensure appropriate accommodation for Company employees.

5.0 Transitional Work Program

- The Company will make every reasonable effort to provide suitable (temporary) transitional employment for any employee unable to perform their regular duties due to a work-related injury. This may include a modification of the employee's original position, providing alternate duties, or work at a non-profit organization. Studies show employees in a transitional position after a work injury heal faster and are in a better emotional state.
- Workers placed on transitional work will be expected to provide feedback to improve the program.
- All employees, injured at work, regardless of injury or illness, will be considered for placement in the Transitional Work Program.
- If an employee refuses to accept transitional employment, document the reasons for the Company's ongoing Program implementation and appropriate insurance providers.

6.0 Recordkeeping

- Worker's Compensation and medical records shall be kept confidential and only accessible to persons who require the information to perform their jobs.

7.0 Related Documents

- Incident Notification Policy and Procedure
- Return to Work and Transitional Work Program Policy Statement
- Return to Work and Transitional Work Program Affirmation

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Policy Statement on
Return to Work and Transitional Work Program

Edgerton Contractors, Inc. ("Edgerton") maintains a Return-to-Work and Transitional Work Program founded on the firm belief that our employees are the Company's greatest asset. In the unfortunate event of an employee injury or illness, Edgerton's primary goal is to take care of its employees, which includes providing reasonable accommodation for the injured worker by identifying or modifying jobs to meet his or her physical capacities, allowing employees to continue working, and returning employees back to work as quickly and smoothly as possible.

Edgerton is committed to early return to work efforts, recognizing they speed up the recovery process and reduce the likelihood of permanent disability to team members. Edgerton employees are expected to demonstrate the same commitment to the program by following the policy and showing a continued commitment to maintaining a safe workplace.

If you become injured on the job, whether you believe you require medical attention or not, it is your obligation to report your injury to your immediate supervisor on the same day as the incident. Your supervisor or a Safety Representative will ensure you receive the proper response, including first aid and medical treatment. They will also assist by filling out an incident report form and staying involved in the subsequent accident investigation to identify and eliminate any hazards associated with your injury.

Edgerton's Return-to-Work and Transitional Work Program is intended to provide meaningful and productive work activity for all employees who become temporarily unable to perform all or portions of their regular work assignments because of a work-related injury or illness. To facilitate this process, return to work duties may be in the form of changed duties within the scope of the current position or other available duties through a reduced hours work schedule.

The Return-to-Work and Transitional Work Program requires a team approach. Employees are expected to cooperate and openly communicate with the management team, supervisors, and medical professionals if they become injured and are unable to perform full job duties.

If you have any uncertainties or questions regarding the content of the Return-to-Work and Transitional Work Program, or the roles and responsibilities of all involved parties, please contact a member of our Safety Department or Ryan Wiesner, General Counsel.

Daniel J. Urbanek, President

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Inspections and Audits

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Policy / Procedure: **Inspections and Audit Program**	Owner: **Safety**	Revision Date **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

The Company, through its Safety Department, will perform routine and frequent inspections of job sites, materials, and equipment as required by OSHA, including but not limited to 29 CFR 1926.20.

2.0 Purpose/Scope

This policy applies to all of the Company's active construction operations and facilities. It defines the process for routine and frequent inspections to prevent incidents by finding and correcting unsafe conditions and unsafe work practices prior to an incident occurring. Inspections may also assess compliance with applicable legal requirements.

3.0 Responsibilities

- **Safety Representatives** are responsible for performing, or ensuring the completion of, routine and frequent inspections at all active jobsites to which they are assigned or that are within their geographic footprint. Other members of management may also perform these duties at the request of a **Safety Representative**.

- **Project Managers** and **Supervisors** are responsible for working with **Safety Representatives** to ensure that any unsafe condition identified during an inspection is properly corrected or eliminated.

- All **Employees** are responsible for participating in and contributing to the inspection program by reporting unsafe acts and conditions immediately to their supervisor.

4.0 General Procedures

- **Informal Workplace Inspections** (**Housekeeping**)**:** As a regular part of the job, all employees will routinely inspect their own work area daily to look for unsafe acts or conditions. Any "housekeeping" hazards need to be corrected immediately to prevent incidents and other losses. If required, involve a supervisor for assistance in correcting any hazard.

- **Regular Documented Inspections:**
  - Formal safety inspections will be conducted by a **Safety Representative** or another designated member of management. An audit / inspection form will document the results of the inspection.
  - Frequent inspections must be completed at least monthly for all active jobsites. Frequent inspections may be completed more frequently based on the size and scope of the work activity. Frequent inspections should focus on the active operations being performed at the time of the inspection.
  - Routine inspections must be completed at least semi-annually for all active jobsites. A routine inspection should be more comprehensive than a frequent inspection and focus on the active work being performed, work environment, materials, and equipment.
  - Safety inspections should include action plans or corrective actions for any unsafe act or condition identified. The results of all safety inspections should be shared with the operational personnel supervising the audited jobsite.

5.0 Training

- All employees engaged in inspections and audits will be trained in the tools used to perform these functions.

6.0 Recordkeeping

- Inspection and audit results will be retained by the Safety Department

Policy / Procedure: **Regulatory Inspection Policy**	Owner: **Safety**	Revision Date: **N/A**
		Effective Date: **June 15, 2026**

1.0 Policy

Edgerton will voluntarily comply with all aspects of applicable government regulatory inspections but do so in a manner that upholds the rights of the Company, its employees, and professional partners and colleagues in the industry.

2.0 Definitions

- Regulatory Inquiry or Inspection: An inquiry or investigation that stems from an Incident, complaint, or workplace/jobsite inspection by an official from a regulatory or government agency, including the Occupational Safety & Health Administration (OSHA), Mine Safety & Health Administration (MSHA), or US Department of Transportation (DOT).

3.0 Responsibilities

- Project Managers and Supervisors are responsible for ensuring their crew members are trained in this policy and familiar with the steps required in the event of a Regulatory Inquiry or Inspection.

- Safety Director is responsible for monitoring compliance with this policy and leading Company response to Regulatory Inquiry or Inspection. General Counsel will assist with response efforts.

4.0 General Procedures

- **Regulatory Inspections and Inquiries:**
  - The Company strives to comply with all applicable local, state, and federal regulations and all applicable project or site safety requirements and will voluntarily comply with all government Regulatory Inspections or Inquiries.
  - Entry onto Company facilities will be permitted for purposes of legally authorized inspections conducted by a properly credentialed government inspector or compliance officer.
  - If an inspector or compliance officer is requesting access to a project or property controlled or owned by a third-party, the Company will reasonably act to protect the rights of any third party who may require production of a warrant prior to inspection.
  - The Company will never, under no circumstances, discipline or discriminate against any employee who has exercised a right under any regulation, including the right to request compliance inspections.

- **Notification Requirements:**
  - All employees are required to make immediate notification if they receive any contact from an official representing a regulatory agency. Contact from a regulatory agency official may be via site visit, fax, letter, mail, phone, or email.
    1. Immediate notification should be made to the Safety Director or General Counsel.
    2. If the Safety Director or General Counsel is unavailable, make immediate notification to your area Safety Representative or Area Manager.
  - If the regulatory agency official's contact is made by visiting a site, the employee who makes first contact should inform the regulatory official of the following:

    1. That notification must be made to Company leadership prior to the regulatory official entering or inspecting the site.

2. That the regulatory official is free to wait in a designated job trailer, vehicle, or other area away from active work while a Company representative responds.
3. And that a Company representative will communicate with the regulatory official as soon as possible.

- No employee can or should authorize a regulatory official to enter a Company jobsite or facility without prior approval from the Safety Director or General Counsel.
- The Safety Director and General Counsel will coordinate the investigation activities and will notify operations personnel of any action they are to take.

- **Internal Inspection Guidelines:**
  - No employee should discuss any accident or inquiry with any customers, government officials, or any other Company or non-Company personnel unless authorized to do so by an approved Edgerton representative.
  - The Safety Director, or other Company representative involved in the inspection, should do the following:
    - Treat the inspector with respect.
    - Request to see the inspector's official credentials.
    - Request a copy of any complaint prior to the inspection commences.
    - Document the inspection activities, e.g., where the inspector goes, who the inspector speaks with, any comments the inspector makes.
    - Attempt to duplicate any photographs or videos taken by the inspector.
    - Cooperate with the inspector's questions and respond directly to questions asked by the inspector, but do not volunteer additional information or answer questions that you do not understand.
    - Never admit liability or responsibility for an alleged violation.
    - Request a written Document Request if the inspector requests production of any materials.

5.0 Recordkeeping

- Copies of any materials received from a regulatory agency must be sent to the General Counsel and Safety Director to be maintained in the appropriate corporate files.