



ADEP Group, INC.
1112 Broadway Rd.
Dracut, MA 01826

Safety Documents

HEALTH & SAFETY PROGRAM

RESPONSIBILITY:

All managers and supervisors are responsible for implementing and maintaining the Health & Safety Program in their work areas and for answering worker questions about the Program. A copy of this Health & Safety Program is available from each manager and supervisor.

The program is designed to prevent or minimize the consequences to injuries and illnesses caused by accidents or catastrophes, mending releases of toxic, reactive, flammable or chemicals.

COMPLIANCE:

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly. It is expected that managers and supervisors will impartially and consistently enforce these regulations.

All employees are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe work environment.

Our system of ensuring that all workers comply with these practices includes the following:

1. Informing workers of the provisions of our Health & Safety Program at the time of hire as well as reviewing materials contained herein on a periodic basis during field safety meetings.
2. Evaluating the safety performance of all workers.
3. Recognizing employees who perform safe and healthful work practices.
4. Providing training to workers whose safety performance is deficient; and
5. Disciplining workers for failure to comply with safe and healthful work practices.
6. Instructing workers of any known potential fire, explosion, or toxic release hazards.

PROPOSED ELECTRICAL SAFEGUARDS:

ADEP Group will implement electrical safeguards to be performed by an electrical contractor. This contractor will set up GFCI outlets prior to abatement work for electrical power source. ADEP Group will have safeguards implemented to safely perform the project. The electrical Contractor will not be responsible for:

1. Transformers
2. Lighting
3. Power panels

COMMUNICATION:

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management, and workers in a form that is readily understandable and consists of one or more of the following items:

1. New worker orientation including a discussion of safety and health policies and procedures.
2. Review of our Health and Safety Program.
3. Workplace safety and health training programs.
4. Regular, weekly scheduled safety meetings.
5. Effective communication of safety and health concerns between workers and supervisors, including translation where appropriate.
6. Posted or distributed safety information.
7. A system for workers to anonymously inform management about workplace hazards.

An integral part of the Health & Safety Program is the employer's establishment of an employee communication program. This program must be designed so that it encourages individual employees to become actively involved in the identification of hazards in the workplace. ADEP will strive to introduce a pro-active health and safety program that rewards employees for conducting their duties in a safe, responsive manner. The firm encourages employees to constantly participate in the communication of workplace hazards.

To ensure that employees comply with the health and safety directive outlined by this program, criteria will be introduced which reward those individuals who employ safe work practices in the performance of their duties and discipline those employees who disregard acceptable company health and safety practices. Under no circumstances will an employee receive a reprisal for communicating any health and safety concern to management or refusing to perform any perceived or self-determined 'unsafe act'.

The communication of workplace hazards/corrective actions from employers to employees is comprised of the following parts:

1. Communication of health and safety hazard information.
2. Communication of workplace hazards identified through periodic inspections.
3. Communication of significant changes in health and safety policies and practices.
4. Employee recognition programs.
5. Employee progressive discipline programs.

Additionally, to assist employees in communicating hazards to management, several of the following methods will be introduced. The methods are:

1. Meetings
2. Availability of Managers and Supervisors
3. Anonymous Communication

At a minimum, ADEP will adopt a system of gathering information from employees on unsafe conditions, unrecognized hazards or safety rule violations in the workplace and communicate this information to its employees in a timely manner.

It is the employer's responsibility to ensure that all health and safety rules conveyed to employees are fully understood by all employees.

To convey information to employees regarding hazardous conditions, management will introduce one or all the following:

Joint Loss Management Committee

Both management and staff can request a meeting to convey relevant information to employees on health and safety issues in the workplace. All meetings should be well documented with summarized minutes including corrective actions forwarded to all employees.

Supervisor – Management Meetings

A disadvantage of relying solely on meetings for communication is that certain employees may not wish to discuss health and safety issues in an open forum. Therefore, ADEP has also developed a method for anonymous communication.

Employee Training

All employees will be trained in the work practices necessary to perform their job. Training of employees involves both the understanding of hazard reduction techniques and the recognition of hazards within the employees' work area. Training generally involves two main stages: initial training (used both at commencement of employment and prior to transfer to a new job task) and ongoing (or re-training). All training programs shall be documented. This will be implemented by informal meetings with employees as well as formal training programs for those activities that require formal training.

Postings/Written Communication

Information pertaining to substantive health and safety issues will be relayed to staff members by both postings and/or written communications.

Postings involve the placement of notices on company bulletin boards or job site bulletin boards located in designated areas.

Written communications involve the use of internal memorandums to staff members and/or the use of attachments to paychecks.

Page one of this program describes the system used by the organization to conduct periodic inspections of the overall work environment. These reviews, undertaken by the responsible person or his/her representative, should indicate those areas where changes to work systems need to be addressed to reduce any potentially hazardous condition.

After review by management, the changes needed to reduce hazardous conditions shall be relayed to all affected employees. This will be done through meetings, employee training, and posting/written communication.

HAZARD ASSESSMENT:

Periodic inspections to identify and evaluate workplace hazards shall be performed by a competent person at the following locations:

1. Project Sites – Daily by Supervisor – Monthly by Management
2. Office and Warehouse Spaces – Monthly by Management

Periodic inspections are performed according to the following schedule (or a minimum of every 30 days):

1. When we initially established our Health & Safety Program.
2. When new substances, processes, procedures, or equipment which present potential new hazards are introduced into our workplace.
3. When new, previously unidentified hazards are recognized.
4. When occupational injuries and illnesses occur.
5. When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
6. Whenever workplace conditions warrant an inspection.
7. Jobsite-specific inspections will be performed daily.

Periodic inspections will also be performed by managers other than the competent person for the job, at a minimum, on a monthly basis.

Periodic inspections consist of identification and evaluation of workplace hazards specific to the environment being reviewed with methods to identify and evaluate workplace hazards. To conduct this investigation, ADEP will complete the following Job Site Weekly Inspection Report (self-inspection guide).

During the inspections and hazard assessment process, confidential information or trade secrets may be revealed. The confidential nature of this information will be respected.

ACCIDENT/EXPOSURE INVESTIGATIONS:

Procedures for investigating workplace accidents and hazardous substance exposures. All accidents, incidents and near misses shall be reported immediately.

An investigation will follow all reports and include the following:

1. Visiting the accident scene as soon as possible (within 48 hours).
2. Interviewing injured workers and witnesses.
3. Examining the workplace for factors associated with the accident/exposure.
4. Determining the cause of the accident/exposure.
5. Taking corrective action to prevent the accident/exposure from reoccurring.
6. Recording the findings and corrective actions taken.
7. Maintain records for five (5) years.

HAZARD RESPONSE / CORRECTION:

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

1. When observed or discovered.
2. When an imminent hazard exists, which cannot be immediately abated without endangering employees and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection.
3. All such actions taken and the dates they are completed shall be documented on the appropriate forms.

TRAINING AND INSTRUCTION:

All workers, including managers and supervisors, shall have training and instruction on general and job specific safety and health practices. Training and instruction shall be provided as follows:

1. When the Health & Safety Program is first established.
2. To all new workers, except for construction workers who are provided training through a construction industry occupational safety and health training program approved by OSHA.
3. To all workers given new job assignments for which training has not previously provided.

4. Whenever new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard.
5. Whenever the employer is made aware of a new or previously unrecognized hazard.
6. To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed.
7. To all workers with respect to hazards specific to each employee's job assignment.

Workplace safety and health practices for all industries, including our firm include, but are not limited to, the following:

1. Explanation of the employer's Health & Safety Program, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
2. Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
3. Information about chemical hazards to which employees could be exposed and other hazard communication program information.
4. Availability of toilet, handwashing and drinking water facilities.
5. Provisions for medical services and first aid including emergency procedures.

In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

EMPLOYEE RECOGNITION PROGRAM:

To ensure the continuing success of the Health & Safety Program, employees will be encouraged to actively participate in its development. Those employees who continue to have a good safety record and/or proactively seek to identify hazards in their work area should receive awards or other forms of encouragement.

EMPLOYEE PROGRESSIVE DISCIPLINE POLICY:

ADEP management shall provide a uniform approach to the administration of discipline for health and safety issues, in the belief that discipline is corrective and not a negative breach of policy or unacceptable work practice.

The procedure to follow is:

1. **Verbal Warning:**

Administered when supervisor and/or responsible person determines that an employee has violated a health and safety requirement. The supervisor should inform the employee of the:

Actual policy/procedure that has been violated, and the employee should be asked to respond to “why did the violation occur?”

All verbal warnings should be documented by the supervisor and sent to the company’s responsible person and/or Human Resource Director.

2. **Written Warning:**

Administered when the employee has received a previous verbal warning or when a health and safety infraction occurs. All written warnings should contain the following:

- Date of infraction
- Description of violation
- Description of acceptable practice
- Corrective action to be taken
- Result of further violation (i.e., additional written warnings, suspensions, or terminations)
- Employee’s signature

3. **Suspension:**

Administered when specific health and safety policy and procedure violations warrant immediate removal of an employee from a work area. Such violations would include flagrant misconduct that places an employee’s health and safety in danger.

No employee should be discharged without notifying and obtaining prior approval from the responsible person and/or the Human Resource Director.

Termination is inevitable and cannot be avoided (three strikes rule)

EMPLOYEE RESPONSIBILITY:

All employees shall abide by the designated safe work practices. These work practices are defined more specifically in the following documents:

1. Confined Space Entry Program – Permit Required
2. Hot Work – Permit Required
3. Lock Out / Tag Out
4. Asbestos and Lead Paint Removal
5. Code of Safe Practices

All employees must take an active role in the compliance with safety-related requirements of their jobs. It is the employee's responsibility to inform management of any unsafe condition or practice, previously unrecognized hazards, and any other suggestions to improve workplace safety. It is also the responsibility of individual employees to inform management of safety rule violations by other employees. Employees must be aware that there will be no reprisals associated with informing management about a health and safety issue.

To assist the employees with their health and safety suggestions, the following methods of communication are available.

Employer/Employee Meetings

As previously discussed, all employees have the right to request a meeting with management to discuss health and safety issues. Management must be receptive to such a request.

Availability of Managers and Supervisors

As managers and supervisors are ultimately accountable for the health and safety of all the employees under their control, discussions with individual employees regarding health and safety issues shall be encouraged.

All employees can discuss specific health and safety issues with their immediate supervisor or manager and this supervisor or manager must provide the employee with a written response to their complaint or suggestion. This written response must also be forwarded to the responsible person.

Anonymous Communications

Employees are reminded of their right to make safety inquiries and report information. To encourage this practice, ADEP shall set up a suggestion box in a conspicuous place and have available suggestion forms for employees to complete.

RECORDKEEPING AND TRAINING:

We have taken the following steps to implement and maintain our Health & Safety Program:

1. Records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form; and
2. Documentation of safety and health training for each employee, including the employee's name or other identifier, training dates, type(s) of training and training providers are records on an employee training and instruction form. We also include the records relating

to employee training provided by a construction industry occupational safety and health training program approved by Cal/OSHA.

3. Inspection records and training documentation will be maintained for a minimum of three years.