

Mikalan Roofing Inc.



Specializing in single ply roofing systems

MIKALAN ROOFING INC.

WRITTEN SAFETY PROGRAM

**FOR
EMPLOYEES
AND
SUBCONTRACTORS**

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SAFETY PROGRAM

Introduction and Orientation

New Employees and Subcontractors

Mikalan Roofing is very serious about safety. We want you to also think seriously about safety – both your own safety and the safety of others.

Safety is the responsibility of every employee and/or subcontractor. Most injuries occurring in our industry are preventable. One does not need to suffer an injury trying to get a job done. When you see an unsafe act or an unsafe condition, correct it yourself immediately or ask your supervisor for help in getting it corrected. If you have any problems, such as dizziness, trouble breathing, bad back, have fainting spells, personal problems, etc., which could affect your work, let your supervisor know about it. Supervisors need to know so you won't be placed in a situation where you could hurt yourself or others.

Everyone accomplishes safety through effective communication, sincere desire, honest effort, common sense, and support. Merely talking about safety does not prevent accidents from happening.

Your supervisor will hold periodic safety meetings for the entire crew. These are in addition to regular safety meetings held at the office. You are required to attend these meetings, participate in these meetings, and contribute your 'know-how' for the less experienced and ask questions if you do not understand.

Learn the materials in this safety booklet. Refer to this material and to your supervisor before starting any task that may be unfamiliar to you. Be aware of other activity nearby that may create hazards to you or which may affect your work.

By signing the last page of this booklet you agree that you have read and understand its' contents and agree to abide by all of Mikalan Roofing's safety rules and procedures.

MIKALAN ROOFING, INC. SAFETY INSPECTIONS AND AUDITS

General

Mikalan believes that inspections are an important element of any safety management program. Inspections help hold all employees accountable for safety performance and assist in Mikalan's effort to eliminate unsafe working conditions from the jobsite.

- I. Corporate Audit
Periodically the Mikalan Safety Monitor will review and evaluate the site safety management program for effectiveness.
- II. Foreman & Project Superintendent is to inspect his/her work area prior to each shift and periodically during the day-as necessary-to ensure a safe and healthful working environment for all employees. As a key link between the field employees and Mikalan management, each foreman has a major responsibility to inspect his/her work area.
- III. Subcontractors
Each subcontractor on all Mikalan jobsites must complete their own periodic and site-specific safety inspections, to be done by a designated safety person. These must be in addition to the regular observations and inspections that are to be constantly monitored by the crew foremen during all construction operations.

Inspection Responsibilities

1. Correct any imminent danger hazards immediately
2. Assist the project in correcting unsafe conditions and changing any unsafe employee work practices that are not compliant with city, county, state, federal, and MIOSHA regulations
3. Inform Mikalan safety personnel of any jobsite safety and health issues which are not immediately correctable
4. Inform employees of all safety and health rules and safety procedures

GENERAL SAFETY RULES

*All of our safety rules must be obeyed. Failure to do so will result in strict disciplinary action being taken.

- 1) Keep your mind on your work at all times. No horseplay on the job. Injury or both, can be the result.
- 2) Personal safety equipment must be worn as prescribed for each job, such as: safety glasses when operating all cutting tools, hammer drills, power sweepers on coal tar tear-offs. Hard hats must be worn when working with a crane or working under other trades. Respirators are required on coal tar tear-offs. Rubber gloves must also be worn when cleaning seams and cleaning spills. It is also recommended that safety shoes be worn on the job.
- 3) Keep your shirt on to prevent sunburn and to protect against burns and cuts. Minimum clothing for the upper body is a T-shirt.
- 4) Watch where you are walking. Don't run.
- 5) A good job is a clean job and a clean job is a safe one. So keep your work area free of all debris and rubbish.
- 6) Never move an injured person unless it is absolutely necessary. Further injury may result. Keep the injured as comfortable as possible and utilize job site first aid facilities.
- 7) Know where fire-fighting equipment is located and learn how to use it.
- 8) Learn to lift correctly – with legs, NOT the back. If the load is too heavy get help. 20% of all construction injury result from lifting materials.
- 9) Be sure that all guards are in place. Do not remove, displace, damage, or destroy any safety device or safeguard furnished or provided for use on the job, nor interfere with the use of.
- 10) Never oil, lubricate or fuel equipment while it is running or in motion.

- 11) Rope off or barricade danger areas.
- 12) Use the “four-and-one” rule when using a ladder. One foot of base for every four feet of height.
- 13) Always secure the bottom of the ladder with cleats and/or safety shoes. Lash off the top of the ladder to avoid shifting and/or falling.
- 14) All ladders must extend 3’ above the landing for proper use.
- 15) Keep ladder bases free of debris, hoses, wires, material, etc.
- 16) Use extension cords of the three-prong type. Ground fault connectors must be utilized.
- 17) Never throw anything over the edge of the building. Someone passing below may be seriously injured.
- 18) Know what emergency procedures have been established for your job site. (location of emergency phone, first aid kit, stretcher location, fire extinguisher locations, evacuation plan, etc.)
- 19) Always keep roof openings covered.
- 20) The use of illegal drugs or alcohol or being under the influence of it on a project shall be cause for termination. If strong prescription drugs are given you that warn against driving or operating machinery, let your foreman know about them.
- 21) Do not use power tools and equipment until you have been properly instructed in safe work methods and become authorized to use them.
- 22) Know where to locate ~~Material~~ Safety Data sheets and be familiar with how to read them. (Link to SDS sheets attached)
- 23) Perimeter warning line systems MUST be used properly. Be sure how to use these systems. Working outside the warning lines is prohibited without safety

monitor and/or harness.

- 24) Proper foot attire must be worn. (Work boots with steel toed foot protection).
- 25) Hard hats are required when work is in process overhead – This includes when you are going up or down ladders.
- 26) Fire extinguishers are required on the roof when work is taking place.
- 27) All employees are required to attend bi-weekly safety meetings on Monday mornings at the office.
- 28) All subcontractors must have at least one employee representative on-site who is professionally certified in both 1st Aid and CPR.
- 29) No theft of Mikalan property or personal property, or property of a third party.
- 30) Vandalism, sabotage, and graffiti, will result in dismissal and prosecution.
- 31) Failure to work in a safe manner or other violation of safety rules is grounds for dismissal.
- 32) No threatening, intimidating, coercing, abusive language or interfering with job performance.
- 33) No sexual harassment, immoral, indecent, verbal, or physical contact.
- 34) No firearms or weapons allowed on the jobsite or owners property.
- 35) Notify the Mikalan project superintendent of any injuries immediately.
- 36) All employees vehicles brought on site are subject to search.
- 37) All employees' pockets, purses, briefcases, toolboxes, or other containers on site are subject to search.

DRUG AND ALCOHOL POLICY

To ensure a safe and productive work environment, and to safeguard the owner, and company property, Mikalan has established a drug and alcohol policy.

All employees and subcontractor employees working on Mikalan projects shall not work under the influence of drugs and alcohol. Subcontractor and/or employees found with reasonable cause to be under the influence will be reported to their supervisors and banned from working on that project.

1. Some jobsites may require additional drug and alcohol testing to meet contractual requirements.
2. All employees involved in a jobsite accident must be drug tested.
3. Employees under the influence of prescription medications must make their supervisor aware of this fact. Unauthorized prescription medication is also dangerous and is not acceptable.

HAZARD COMMUNICATION "RIGHT TO KNOW LAW"

Mikalan Roofing is required to comply with the hazard communications or the "Rights to Know Law." The standards for these programs can be found in the MIOSHA standards guidelines, Pt. 42. Each chemical that is brought on site must be accompanied by an MSDS, and a copy of that MSDS made available to employees. The standard requires that all chemicals on your worksite be fully evaluated for possible physical or health hazards and that all information relating to these hazards is available to employees. The five parts of this program are: Written Program, ~~Material~~ Safety Data Sheets (~~M~~MSDS), Container Labeling, Information and Training, and Employee Right to Know. *Also includes written Silica Exposure Plan.*

Mikalan Roofing will: 1. have a written hazard communication program, 2. train employees about the program, 3. label all containers and 4. maintain ~~M~~MSDS sheets in all job trailers and trucks.

PERSONAL PROTECTIVE EQUIPMENT

All employees shall be required to wear personal protective equipment for protection against recognized hazards. All regulations set forth in the MIOSHA Construction Safety & Health standards – Pt. 6, must be adhered to, as well as any Mikalan or owner regulations. The following list is personal protective equipment required on all Mikalan Roofing sites.

1. Hard hats are MANDATORY ON ALL MIKALAN JOBSITES. There are NO exceptions to this rule. Hard hats Must be worn at times when working at or near overhead hazards or when required by contractor or owner.
2. Eye protection must be worn when hazards of flying debris, chemical splash, or other eye hazards exist.
3. Additional eye and face protection, such as face shields and welding shields may be required when engaged in work such as welding, burning, grinding, chipping, among others.
4. Leather, construction-type footwear that covers the ankle shall be worn at all times.
5. When exposed to a fall of 6' or more, adequate fall protection must be provided by the subcontractor and worn when needed.
6. Hearing protection is recommended when working in high noise areas. Any employee exposed to a decibel level of **90 db** or more, over a period of 8 hours is required to wear approved hearing protection.
7. When exposed to respiratory hazards such as dusts, fumes, mist, vapors, or gasses, appropriate respirators or similar protective equipment shall be used.
8. Fall protection equipment such as full-body harnesses and lanyards must be maintained in good, safe condition.

FIRE PREVENTION AND PROTECTION

With the excessive amounts of flammable and combustible materials such as lumber, paper products, chemicals, etc. a fire protection program is a MIOSHA requirement. All regulations set forth in the MIOSHA Construction Safety & Health standards- Pt.18, must be adhered to, as well as any Mikalan or owner regulations. There are several things you will need while working on a Mikalan project to ensure the safety of your employees and the project.

1. Telephone #'s of all emergency medical services shall be posted in all jobsite trailers.
2. All employees shall be trained, by the employing Subcontractor, in the application and use of fire extinguishers.
3. There must be a class ABC fire extinguisher located within 100' of any work area.
4. Each Subcontractor will be responsible for providing their own fire extinguishers to any area that they are working in.
5. All flammable and combustible materials should be properly stored until consumed or otherwise removed.
6. Gasoline and other flammable liquids shall be stored and handled in approved portable tanks or safety cans. No plastic fuel containers or containers without safety latches are allowed on the jobsite.
7. Smoking is prohibited within 50' of any fuel storage area.

HOUSEKEEPING

Good housekeeping and orderliness is a basic requirement for all jobs and must be maintained at all times. Neat and orderly jobsites play a vital part in the prevention of accidents and injuries. The removal on a regular basis of accumulated scrap lumber, material banding, pallets, boxes, trash, etc. decreases the possibility of injury. All regulations set forth in any applicable sections of the MIOSHA Construction Safety & Health standards, must be adhered to, as well as any Mikalan or owner regulations.

1. Work and storage areas shall be maintained and kept in a clean and orderly condition.
2. All materials stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling, or collapse.
3. Special attention must be given to maintaining clear walkways for the free movement of employees.
4. Rubbish, debris, and waste in work areas shall be collected and discarded on a daily basis.
5. Protruding nails, spikes, wire, and banding shall be bent over or removed.
6. Housekeeping is everyone's responsibility; general housekeeping shall be performed as work progresses. **CLEAN AS YOU GO!**

HAND AND POWER TOOLS

All hand and power tools shall be used only for the purpose for which they are intended, and shall be maintained in safe working condition. All regulations set forth in the MIOSHA Construction Safety & Health standard-Pt.19, must be adhered to, as well as any Mikalan or owner regulations.

1. All guards and safety devices shall be in place and working properly.
2. All electrically powered tools and cord sets shall meet Assured Grounding requirements found in R408.41722.
3. Pneumatic impact tools shall be equipped with safety clips or retainers to prevent tools from being expelled from the barrel.
4. The use of a face shield, safety glasses, and a fire extinguisher are required when using an abrasive cut-off saw.
5. Chain-falls and come-a-long's with defective throat latches shall be replaced. The latch must close completely against the hook tip for proper use.
6. Powder actuated tools shall be used only by manufacturer trained and certified personnel.
7. Tools shall not be altered with the addition of handle extensions or cheaters (unless written approval from the manufacturer).
8. Taglines shall be used to control overhead loads which present a hazard by their rotation.

ELECTRICAL SAFETY

Every year, electricity ranks in the top four of MIOSHA recordable and jobsite injuries. Proper precautions need to be addressed to prevent accidents and injuries. All regulations set forth in the MIOSHA Construction Safety & Health standards-Pt.17, must be adhered to, as well as any Mikalan or owner regulations. To prevent personal injury from contact with energized sources, construction workers or subcontractors shall be trained in the fundamentals of electrical safety.

1. All electrical hazards must be abated immediately.
2. An Assured Grounding Program shall be in place at all times in accordance with MIOSHA R408.41772.
3. Electrical extensions and cords, including those found on power tools, shall be inspected each day before work begins.
4. Only UL, heavy duty rated extension cords may be used.
5. Overloading circuits is strictly prohibited
6. A type of Ground Fault Interrupter (GFCI) shall be in place for each power run. **Circuit breakers are not adequate protection.**

*This rule applies to all tools that the subcontractor is using.

FALL PROTECTION

Mikalan Roofing requires the use of fall protection whenever an employee is working at heights of six (6) feet or greater from any unprotected, elevated location to a surface below, and as required by local, state, and MIOSHA Construction Safety Standards at PT.45 Fall Protection requirements.

The following procedures must be implemented on all projects:

1. An approved safety harness with 2 lanyards is to be worn at all times while working more than 6 ft. above the ground and/or floor elevations, where there is not a properly constructed guardrail or warning line system.
2. An anchorage point used to attach fall protection must be capable of supporting 5,000 lbs. of dead load, and must limit free-fall to 6' or less.
3. Any employees working off scaffolding above 6' high with incomplete guardrail or decking must be tied off.

4. Around roof or floor openings with a fall greater than 6', workers need to be tied off unless opening is covered or has guardrail.
5. Perimeter warning lines are to be erected at entire roof perimeter of work area and must be maintained throughout project.
6. A safety monitor must be present to monitor any work completed outside of warning line system or on projects too small to warrant erection of warning line system.
7. All unprotected structures, work platforms, and incomplete scaffolds where standard railings have not been installed on all open sides and ends must be accompanied by proper fall protection.
8. Ensure that all fall protection is in good condition and will be effective in preventing a fall injury.
9. Never tie off to electrical conduit, 2x4's, etc.

LADDER SAFETY

Ladders are a highly utilized tool in the construction industry, and are the cause of many accidents and injuries. Mikalan Roofing, as well as MIOSHA have several requirements for the use of ladders on all jobsites. All regulations set forth in the MIOSHA Construction Safety & Health standards- Pt. 11, must be adhered to, as well as any Mikalan Roofing or owner regulations.

1. Any ladder found to have loose or missing nails, bolts, screws, bracing, cracked, broken, badly dented or worn rungs, cleats, broken or dented side rails are to be discarded from the job.
2. The use of metal ladders on or around electrical installations or exposed to electrical circuits is strictly prohibited.
3. Never attempt to increase the height of a ladder by placing it on boxes, crates, tailgates, etc.
4. Never place ladders in doorways, walkways, or exits, unless protected by barricades.
5. Keep the top and bottom access areas free of obstructions.
6. Keep ladders free and clear of hoses, cords, and leads that create and obstruction.
7. Never use ladders as a platform, runway, or scaffold.
8. Always climb the ladder maintaining 3 points of contact.

9. Always carry tools, equipment, and materials in a tool belt or use a hand line to pull up or let down, keep both hands free for climbing.
10. Only one person is allowed on a ladder at a time.
11. The base of all extension ladders shall be placed at a 4:1 pitch from the object supporting the ladder-4' of height requires 1' of base.
12. Never lean out from a ladder, keep your body positioned between the side rails.
13. Stepladders are to be fully opened with the spreaders locked in place, so that all 4 feet are on solid ground.
14. Never work off the top platform or the top stem of the step ladder.
15. Never access or work from the back side of a step ladder. (unless it is a double sided ladder).
16. Extension ladders must extend 3' above the landing and be secured at the top when used for access.
17. Double ladders may be used if approved by manufacturer.

SCAFFOLDING AND WORK PLATFORMS

The intent of the scaffold policy is to assure that personnel perform their work safely from a scaffold or working platform that is complete and constructed in accordance with federal, state, local, Mikalan Roofing and client regulations. All regulations set forth in the MIOSHA Construction Safety & Health standards-Pt.12, must be adhered to, as well as any Mikalan Roofing or owner regulations. Scaffolding shall be erected in accordance with R408.41210 in the MIOSHA regulations.

1. All scaffolding and work platforms are to be erected, moved, altered, or dismantled under the supervision of a Competent Person.
2. Inspect all equipment before using. Any material that is bent, broken, incomplete, or damaged shall be removed from the jobsite immediately.
3. Never work below scaffolding or work platforms that are in use by other employees.
4. Guardrails shall be installed on all open sides and ends of platforms more than 6' above the ground or floor.
5. The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement.

Unstable objects such as barrels, boxes, loose brick, or concrete blocks shall not be used to support scaffolds or planks.

6. All planking shall be scaffold grade or equivalent as recognized by approved grading rules for the species of wood used. 2x10" or wider planks shall be used and must not show excessive wear or splitting.
7. The planking of platforms shall be overlapped (minimum of 12") or secured from movement.
8. Wooden scaffold planks shall extend over their supports not less than 6", and no more than 12".
9. Sections to be used as work platforms must be fully planked.
10. Tools, materials, and debris shall not be allowed to accumulate in quantities to cause a hazard.

FORKLIFT/ELEVATING WORK PLATFORMS

Heavy equipment is an important part of any construction progress. The usage and exposure to hazards created by these pieces of machinery is a cause of many major, if not fatal accidents. These pieces of equipment must be treated with utmost respect and extra care and caution must be taken. All regulations set forth in the MIOSHA Construction Safety & Health standards must be adhered to, as well as any Mikalan Roofing or owner regulations.

1. It is important to inspect each piece of equipment each day before use to ensure its safe working condition.
2. Always be aware of your surroundings before operating equipment. Pay special attention to overhead power lines.
3. It is important that all operators are familiar with each piece of equipment that they operate. Do not operate any equipment that you are unfamiliar with before being trained or reading the operator's manual and practicing operation in a safe area.
4. Always stay within the rated capacities of the equipment.
5. All operators must be trained on equipment usage by a qualified trainer and must possess an **Operator's Permit Card** issued by his/her employer.
6. When a load is elevated or if an employee is raised in an approved forklift basket, the operator must remain in the seat, at the controls.
7. Be sure to have adequate ventilation when operating fuel powered vehicles.
8. Never drive too fast for jobsite conditions. Always be under control and respectful of other employees on the site.

9. Do not stand on the railings of an elevating work platform.
- 10.No riders are allowed on a forklift.
- 11.Passengers in a boom lift must wear a full body harness and be attached to a proper attachment point.
- 12.Never place limbs near moving parts.
- 13.Before exiting the vehicle, put the forks on the ground, place the vehicle in neutral and se the parking brake.
- 14.Keep a clear view of direction of travel. Travel in reverse if a load blocks your view.
- 15.Never disengage or bypass safety mechanisms.
- 16.Aerial work platforms are not to be operated in winds exceeding 28 mph per manufacturer guidelines.
- 17.Never use objects such as ladders, boxes, etc. to gain additional height.
- 18.Never use the machine as a ground for welding
- 19.Avoid operating machinery above other personnel on the ground
- 20.Make sure no one is under the platform before lowering
- 21.Seatbelts are to be worn at all times while operating a forklift, or any other equipment that is/was equipped from the manufacturer with a seatbelt.

MATERIAL HANDLING, USAGE, AND STORAGE

All regulations set forth in the MIOSHA Construction Safety & Health standards-Pt.8, must be adhered to, as well as any Mikalan or owner regulations.

1. All material stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, failing or collapse.
2. Aisles and passageways shall be kept clear to provide for the free and safe movement of material handling equipment or employees. Such areas shall be kept in good repair.
3. Bagged materials shall be stacked by stepping back the layers and cross-keying the bags at least every 10 bags high.
4. When masonry blocks are stacked higher that 6', the stack shall be tapered back ½ block per tier above the 6' level.
5. Used lumber shall have all nails protruding withdrawn or bent over before stacking.
6. In every inside storage room, there shall be maintained one clear aisle at least 3' wide. Containers over 30 gallons capacity shall not be stacked one upon another.

7. There must not be flammable or combustible liquids in excess of 25 gallons located in a single work area.
8. At least one portable fire extinguisher not smaller than 20 lbs., shall be located not less than 25' or more than 75' from any flammable liquid storage area located outside.
9. No smoking within 50' of any fuel storage area.
10. Fuel gas cylinders shall be stored at least 20' apart when not secured in an approved cart.

HOISTING/RIGGING

Riggers, signalers and others who work with cranes should have qualifications, just as should the operator. Just as an unqualified operator can make a life-threatening error during lifting operations, the inappropriate actions of an inexperienced rigger, signaler or anyone else involved in lifting operations can cause an accident. Most accidents can be easily prevented by proper considerations of safe crane practices and looking for inherent hazards **before** beginning the operations. All regulations set forth in the MIOSHA Construction Safety & Health standards applying to rigging, must be adhered to, as well as any Mikalan Roofing or owner regulations. The following are rules that must be followed, at a minimum, to avoid serious accidents.

1. All rigging operations are to be done by, or supervised by, a qualified rigger who has taken part in a rigging certification program.
2. Be sure that anyone signaling the crane operator is familiar with the proper hand signals. The operator must not make any movements without receiving the proper signals.
3. The crane operator has the final say as to any lifting operations. If he doesn't feel comfortable, he must not be pressured to continue against his better judgment.
4. Always use a tag line to control overhead loads that may create a hazard by its rotation.
5. Records of annual and daily crane inspections must be readily available by the Mikalan Roofing Safety Department.
6. The safety latch on a crane hook may not be deactivated without prior approval by the Mikalan Roofing Safety Department.
7. Rigging is to be inspected prior to each use. Look for cuts, excessive fraying, damaged eyes, bird-nesting, kinking, crushing, etc.

GENERAL SAFETY UNDERSTANDING

As the General Contractor, Mikalan Roofing, Inc. has a contractual responsibility for overall project safety, while subcontractors assume responsibility for their own safety while performing their specific portion of work as contained in the subcontract.

All subcontractors **must comply** with:

- a. The terms and conditions of the subcontract
- b. Basic safety practices and rules set forth by Mikalan
- c. All governmental and MIOSHA standards, to include R 408/235/1910
- d. All site specific policies required by the client

*To eliminate any misunderstandings, the subcontractor must relay these expectations to their jobsite labor crews.

The subcontractor is responsible for implementing its own safety program.

We must insist and document that all subcontractors conduct their work in full compliance with items A-D. Mikalan does not assume any responsibility for their program, and non-compliance will be treated as non-performance under the contract.

We should NEVER directly supervise the subcontractor's employees since we lack the "exclusive remedy" protection under Worker's Compensation with a subcontractor's employee. This would subject Mikalan to unnecessary legal action should the employee be injured.

All subcontractors shall, at their own expense, conform to the basic safety policy of Mikalan, and comply with all specific safety requirements promulgated by any governmental authority including, without limitation, the requirements of the Michigan Occupational Safety and Health organization and all standards and regulations which have been or shall be promulgated by the parties or agencies which administer such acts. Subcontractors shall have and exercise full responsibility for compliance by it's' agents, employees, material-men, and

subcontractors generally; and in particular with respect to any portion of the work on all Mikalan projects, shall itself comply with said requirements, standards, and regulations. They shall require and be directly responsible to defend and be responsible for all citations, assessments, fines or penalties which may be incurred by reason of its failure on the part of any of its' representatives to so comply. The subcontractor must provide all necessary training and information to their own employees. The subcontractor shall report to Mikalan, within 24 hours, any injury to an employee of theirs and allow Mikalan to perform an adequate investigation of any such injury.

MIKALAN SAFETY MISSION STATEMENT

PROVIDE A SAFE AND HEALTHY MISSION STATEMENT

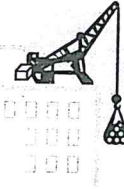
Prevent injuries, illnesses, and damage through constant dedication to the Mikalan Roofing Safety and Health Process.

Continually strive to provide quality safety and health services to Mikalan Roofing and our customers by implementing life-saving, cost-effective safety and health programs.

Strengthen and improve Mikalan Roofing's Safety and Health performance in all operations.

“SAFER, SMARTER, FASTER”

Mikalan Roofing Inc.



Specializing in single ply roofing systems

Mikalan Roofing Inc. Written Silica Exposure Control Program

1.0 Applicability and Scope

1.1 Applicability

This Written Exposure Control Plan (Plan) applies to **Mikalan Roofing Inc.** personnel who are potentially exposed to airborne concentrations of respirable crystalline silica (silica) because of their work activities or proximity to the work locations where airborne silica is being emitted. This Plan also applies to **Mikalan Roofing Inc.** superintendents, foremen, or safety personnel who may be responsible for overseeing a subcontractor's operations that have the potential to expose personnel to airborne concentrations of silica at or above regulatory and industry action levels and exposure limits.

1.2 Scope

This Plan describes the hazards associated with projects involving potential exposure to airborne concentrations of silica and the issues to be addressed during these projects. These projects include, but are not limited to:

- Use of stationary masonry saws used to cut concrete, tile, concrete masonry block, sheet rock, gypsum fiber roof board, or any other product containing quartz.
- Handheld power saws used to cut concrete, asphalt, concrete masonry block, sheet rock, gypsum fiber roof board, or any other product containing quartz.
- Walk-behind saws used to cut concrete or asphalt.
- Rig-mounted or free standing core saws or drills (including impact and rotary hammer drills) used to penetrate concrete, concrete masonry block, sheet rock, gypsum fiber roof board, or any other structural component or product containing quartz.
- Jackhammers and handheld powered chipping tools used to demolish or modify concrete, concrete masonry block, or any other structural component or product containing quartz.
- Handheld grinders or cut-off wheels used for mortar removal or cutting/grinding of concrete, concrete masonry block, sheet rock, gypsum fiber roof board, or any other structural component or product containing quartz.
- Installation or demolition of sheet rock, including mudding, taping, texturizing activities with quartz containing materials.
- Hand or power tool sanding of painted surfaces. Current latex paint products contain quartz and the painted substrate (sheet rock, concrete masonry block, concrete) contains quartz.
- Drivable asphalt milling machines used to mill asphalt roadways or walkways.
- All housekeeping operations associated with the activities described above.

Mikalan Roofing Inc. employees who work in proximity to silica-related operations must be aware of safe work practices and take all necessary precautions associated with avoiding and minimizing airborne silica exposure.

2.0 Regulatory Review

Occupational Safety and Health Administration (OSHA) 29 CFR 1926.1153: Respirable Crystalline Silica (Construction Industry) and 29 CFR 1910.1053: Respirable Crystalline Silica (General Industry), contain

regulatory requirements specific to respirable crystalline silica. This Written Exposure Control Plan is developed in accordance with the requirements in 29 CFR 1926.1153(g).

3.0 Project Planning

3.1 Training Requirements

Mikalan Roofing Inc. employees who anticipate working on projects where they could be exposed to airborne silica will be provided training in silica hazards in accordance the **Mikalan Roofing Inc.** program established to comply with the hazard communication standard (29 CFR 1910.1200). Each employee will have access to labels on containers of crystalline silica and safety data sheets, and be provided information on the health hazards of silica including cancer, lung effects, immune system effects, and kidney effects. In addition, **Mikalan Roofing Inc.** employees will be provided training and information regarding specific activities identified in this Plan that could result in airborne silica exposure, and the specific engineering controls, work practices and respiratory protection requirements to mitigate the potential airborne silica exposures. This training will provide a discussion of silica hazards, initial exposure determination either by complying with 29 CFR 1926.1153 Table 1 requirements or air monitoring, specific engineering and work practice control measures, personal protective equipment (PPE), and medical surveillance requirements. The training will also identify the **Mikalan Roofing Inc.** competent person for silica exposure identification and determination of control requirements. All **Mikalan Roofing Inc.** employees will be provided with access to a copy of 29 CFR 1910.1153 and be trained on the contents of 29 CFR 1926.1153.

3.2 Medical Surveillance Requirements

Mikalan Roofing Inc. shall institute medical surveillance for any employees required by this Plan to where a respirator 30 or more days per year. Initial medical surveillance consists of medical and work history with emphasis on: past, present, and anticipated exposure to silica, dust and other agents affecting the respiratory system; any history of respiratory system dysfunction, including signs and symptoms of respiratory disease (e.g., shortness of breath, cough, wheezing); history of tuberculosis; and smoking status and history; a physical examination with emphasis on the respiratory system; chest X-ray (a single postero-anterior radiographic projection or radiograph of the chest at full inspiration recorded on either film (no less than 14 x 17 inches and no more than 16 x 17 inches) or digital radiography systems), interpreted and classified according to the International Labour Office (ILO) International Classification of Radiographs of Pneumoconiosis by a NIOSH-certified B Reader; a pulmonary function test to include forced vital capacity (FVC) and forced expiratory volume in one second (FEV1) and FEV1/FVC ratio, administered by a spirometry technician with a current certificate from a NIOSH approved spirometry course; testing for latent tuberculosis infection; and any other tests deemed appropriate by the Occupational Medicine Provider. Subcontractors are responsible for implementing a medical surveillance program for their employees.

2.3 Competent Person Requirements

Mikalan Roofing Inc. shall identify a competent person to inspect and oversee all activities with potential airborne silica exposure. Subcontractors working on projects within the scope of this Program shall appoint a competent person capable of executing the duties described herein. The competent person must have training in the inspection of work areas and equipment and in the determination of safe working conditions. This person shall have a working knowledge of the 1926.1153 standards, shall be capable of identifying airborne silica hazards, shall determine the need for initial and additional exposure monitoring, shall recommend and implement engineering and work practice controls, shall establish levels of PPE, and shall have the authority to take action to eliminate hazards and correct incidences of noncompliance.

2.4 Planning Activities

Projects where anticipated activities involve concrete cutting, grinding, sandblasting, drilling, coring, or other abrasive operations are treated as potential sources for airborne silica exposure. Additionally, existing structures and materials such as sheetrock, any painted surfaces with low volatile organic compounds, tile, brick, or some insulation products may contain silica. Likewise, new material installation may involve silica-containing mortar, paints, or insulation. Where process knowledge indicates the presence of silica, **Mikalan Roofing Inc.** will either implement all controls required by 1926.1153 Table 1- Exposure Control Methods for Selected Construction Operations or conduct an initial determination in accordance with 29 CFR 1926.1153(d)(2).

3.0 Project Execution

3.1 Safe Work Practices

The requirements of this section are to be followed by **Mikalan Roofing Inc.** employees, who may be exposed to airborne concentrations of silica at or above the regulatory limits.

3.1.1 Exposure Assessment

Mikalan Roofing Inc. will either comply with and implement all controls required by 1926.1153 Table 1- Exposure Control Methods for Selected Construction Operations, listed at the end of this written program, or conduct an initial determination in accordance with 29 CFR 1926.1153(d)(2).

- An exposure assessment is required when employees may be exposed to airborne silica at or above the action level in order to determine the extent to which employees are exposed and the appropriate exposure controls required.
- An initial determination of exposure shall be made at the beginning of operations. The determination shall consist of the collection of personal air samples representative of a full shift including at least one sample for each job classification in each work area, either for each shift, or for the shift with the highest exposure level.
- During the initial determination, until such time that actual airborne concentrations are determined, personnel shall be protected by respiratory protection based on task- specific anticipated airborne concentrations of silica as illustrated in Table 2 below:
- During the initial determination, and in addition to the levels of respiratory protection required, personnel shall be provided with protective clothing and equipment, hygiene facilities, and training.
- Whenever a change in equipment, process, controls, or personnel occurs, or a new task has been initiated, an additional exposure assessment is required.
- When an assessment determines that exposure has occurred above the action level but below the PEL, additional monitoring shall be required at least every 6 months. Additional monitoring shall continue until such time that the monitoring results fall below the action level on two separate occasions at least 7 days apart.
- When monitoring yields results above the PEL, then quarterly monitoring is required. In addition, the quarterly monitoring may be suspended when additional monitoring results fall below the action level on two separate occasions at least 7 days apart.
- Where the competent person can clearly demonstrate, in the absence of air monitoring data, that a work activity will not create airborne silica concentrations in excess of the action level, then air monitoring may be unwarranted. Where a negative initial determination is reached without air monitoring, the competent person must develop a written explanation as to why exposures are not expected to exceed the action level.

3.1.2 Communication of Hazards

- Each employee shall be provided training and demonstrate knowledge and understanding of the following:
 - Health hazards associated with exposure to respirable crystalline silica
 - Specific tasks that could result in exposure to respirable crystalline silica
 - Specific measures that are required to protect employees from exposure to respirable crystalline silica, including engineering controls, work practices, and required use of respiratory protection
 - The contents of the 29 CFR 1926.1153
 - The identity of the competent person
 - Purpose and description of the medical surveillance program
- A written compliance program shall be made available to all affected employees.
- In addition, notification to owners, contractors, and other personnel working in the area shall be made.

3.1.3 Control Methods

- Engineering and work practice controls, including administrative controls, shall be implemented to reduce and maintain employee exposure to silica at or below the PEL, to the extent that such controls are feasible.
- Where all feasible engineering and work practice controls that can be instituted are not sufficient to reduce employee exposure to or below the PEL, such controls shall be used, nonetheless, to reduce employee exposure to the lowest feasible level (and in conjunction with respiratory protection).
- Respiratory protection shall be selected based on guidance in 1926.1153 Table 1 or based on a Certified Industrial Hygienist's or competent person's assessment of the potential airborne exposure that may be created by the means and methods of work (high energy operations with high airborne dust generation or low energy operations with low dust generation).
- When using mechanical ventilation to control exposure, regularly evaluate the system's ability to effectively control exposure.
- If administrative controls are used to limit exposure, establish and implement a job rotation schedule that includes employee identification as well as the duration and exposure levels at each job or work station where each affected employee is located.
- A written compliance program shall be established and implemented prior to the start of operations within the scope of this Written Compliance Plan. The written program shall outline the plans for maintaining employee exposure below the PEL.
- Maintain all surfaces as free as possible from accumulations of silica. Select methods for cleaning surfaces and floors that minimize the likelihood of silica becoming airborne (such as using a HEPA vacuum).
- If vacuuming is the method selected, specialized vacuums with HEPA filtration are required. Methods to use and empty vacuums in a manner that minimizes the reentry of silica into the workplace shall be described and used. Use of household vacuums with HEPA filters are not allowed at any time for the collection of dust or debris that contains silica.

- Never use compressed air to remove silica from any surface unless it is used in conjunction with a ventilation system designed to capture the airborne dust created while using the compressed air.
- Employees shall not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in any areas where exposure to silica is above the PEL (in other words, regulated areas).
- Do not allow employees to leave the workplace wearing any protective clothing or equipment that is required to be worn during their work shift without HEPA vacuum removal of dust.
- Where feasible, install shower facilities and require employees who work in regulated areas to shower at the end of their work shift. Also provide an adequate supply of cleaning agents and clean towels.
- Provide hand washing facilities for use by employees working in regulated areas. Furthermore, require employees to wash their hands and face at the end of the work shift and prior to eating or entering eating facilities, drinking, smoking, or applying cosmetics.
- Eating facilities or areas shall be provided for employees working in regulated areas. These facilities shall be maintained free of silica contamination and shall be readily accessible to those employees.

3.2.5 Personal Protective Equipment (PPE)

Respiratory protection must be used for the following conditions:

- During periods when employee exposure to airborne silica exceeds the PEL
- For work operations where engineering and work-practice controls are not sufficient to reduce employee exposure to or below the PEL
- During periods when an employee requests a respirator
- During periods when respirators are required to provide interim protection while conducting initial exposure assessments
- Powered air-purifying respirators (PAPR) shall be provided to employees who request such a respirator to use where it will provide adequate protection.
- Employees shall be provided, at no cost, protective work clothing and equipment including cotton coveralls or similar full-body clothing, gloves, hats, shoes or disposable shoe coverlets, face shields, vented goggles, or other appropriate PPE.



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Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
		<ul style="list-style-type: none"> feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 		
2a	Handheld power saws (any blade diameter) when used outdoors	<ul style="list-style-type: none"> 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	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
2b	Handheld power saws (any blade diameter) when used indoors or in an enclosed area	<ul style="list-style-type: none"> 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. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
3	Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less) for tasks performed outdoors only	<ul style="list-style-type: none"> 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
4a	Walk-behind saws when used outdoors	<ul style="list-style-type: none"> 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
4b	Walk-behind saws when used indoors or in an enclosed area	<ul style="list-style-type: none"> 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. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
5	Drivable saws for tasks performed outdoors only	<ul style="list-style-type: none"> 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
6	Rig-mounted core saws or drills	<ul style="list-style-type: none"> 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
7	Handheld and stand-mounted drills (including	<ul style="list-style-type: none"> Use drill equipped with commercially available shroud or cowling with dust collection system. 	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
	impact and rotary hammer drills)	<ul style="list-style-type: none"> 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. 		
8	Dowel drilling rigs for concrete for tasks performed outdoors only	<ul style="list-style-type: none"> 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. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
9a	Vehicle-mounted drilling rigs for rock and concrete	<ul style="list-style-type: none"> 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. 	None	None
9b	Vehicle-mounted drilling rigs for rock and concrete	<ul style="list-style-type: none"> Operate from within an enclosed cab and use water for dust suppression on drill bit. 	None	None
10a	Jackhammers and handheld powered chipping tools when used outdoors	<ul style="list-style-type: none"> Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10b	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	<ul style="list-style-type: none"> Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10c	Jackhammers and handheld powered chipping tools when used outdoors	<ul style="list-style-type: none"> 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. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10d	Jackhammers and handheld powered chipping tools when used indoors	<ul style="list-style-type: none"> Use tool equipped with commercially available shroud and dust collection system. Operate and maintain tool in 	N95 (or Greater Efficiency) Filtering	N95 (or Greater Efficiency) Filtering

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
	or in an enclosed area	<p>accordance with manufacturer's instructions to minimize dust emissions.</p> <ul style="list-style-type: none"> 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. 	Facepiece or Half Mask	Facepiece or Half Mask
11	Handheld grinders for mortar removal (i.e., tuckpointing)	<ul style="list-style-type: none"> 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. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	Powered Air-Purifying Respirator (PAPR) with P100 Filters
12a	Handheld grinders for uses other than mortar removal for tasks performed outdoors only	<ul style="list-style-type: none"> 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. 	None	None
12b	Handheld grinders for uses other than mortar removal when used outdoors	<ul style="list-style-type: none"> 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. 	None	None
12c	Handheld grinders for uses other than mortar removal when used indoors or in an enclosed area	<ul style="list-style-type: none"> 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. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
13a	Walk-behind milling machines and floor grinders	<ul style="list-style-type: none"> Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. 	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
		accordance with manufacturer's instructions to minimize dust emissions.		
13b	Walk-behind milling machines and floor grinders	<ul style="list-style-type: none"> 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
14	Small drivable milling machines (less than half-lane)	<ul style="list-style-type: none"> 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
15a	Large drivable milling machines (half-lane and larger) for cuts of any depth on asphalt only	<ul style="list-style-type: none"> 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. 	None	None
15b	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	<ul style="list-style-type: none"> 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. 	None	None
15c	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	<ul style="list-style-type: none"> 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
16	Crushing machines	<ul style="list-style-type: none"> 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. 	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
		fresh, climate-controlled air to the operator, or a remote control station.		
17a	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	<ul style="list-style-type: none"> Operate equipment from within an enclosed cab. 	None	None
17b	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	<ul style="list-style-type: none"> 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
18a	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	<ul style="list-style-type: none"> Apply water and/or dust suppressants as necessary to minimize dust emissions. 	None	None
18b	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	<ul style="list-style-type: none"> When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab. 	None	None

When implementing the control measures specified in Table 1, HRC shall:

- For tasks performed indoors or in enclosed areas, provide a means of exhaust as needed to minimize the accumulation of visible airborne dust;



RETURN TO WORK GUIDELINES

STATEMENT OF POLICY

This section identifies the intent of the program. It should be specific to a return to work program; however, it should be put together in connection with your safety plans policy statement.

SCOPE OF PROGRAM

This indicates the employers willingness to participate in this program and indicates also which employees are eligible for the program. Full time, part time, temporaries, etc.

RATE OF PAY

Payroll should be reviewed by management and adjusted accordingly. The employees should be told what criteria will be used in determining the rate of pay and who decides the rate of pay.

MEDICAL TREATMENT

This section details where the treatment should be sought. It should be indicated here that utilization of the company doctor/physician is required.

MEDICAL RELEASE AND RESTRICTIONS

The capacity of the employees return to work is determined by the treating physician. The restrictions will be considered in putting a job position together.

TYPE OF WORK

The type of work conducted by the employee will be reviewed on a case by case basis.

COMMUNICATING WITH PHYSICIAN

The physician shall keep the appropriate management personnel informed of any changes in diagnosis or treatment of employees, which may include restrictions in writing as soon as possible.

RETURN TO WORK PROGRAM

RESTRICTED WORK ACTIVITY PROGRAM

STATEMENT OF POLICY

1. It is our prime objective to return the injured worker to productive employment as soon as possible. The Restricted Work Activity Program has been designed for employees who are temporarily or partially disabled due to work related injuries. These employees can return to work in a restricted capacity before they are able to return to work to their normal duties.

SCOPE OF PROGRAM

2. This temporary assignment will allow the employee to continue medical treatment and rehabilitation therapy while attending work. The work being performed is restricted work within position guidelines. It is very important that the restrictions be followed closely so that they can be lifted as soon as possible.
3. During the restricted period of activity, payroll levels will be reviewed by management, and where indicated, adjustments of rate will be affected. This is solely at the option of management, and such criteria as availability of substitute work, extend of rehabilitation, and professional assessment by attending physician of duration and/or diminishment of abilities, etc. will all be utilized to determine payroll level. Workers Compensation benefits and payroll may be coordinated according to the situation.
4. The employee will be examined by the Company physician as well as a physician of the employee's choice.
5. Both physicians will submit a detailed report of the employee's injuries along with the physician's recommendation for returning to work in either a restricted work capacity or a normal capacity.
6. Work duties will be established in accordance with positions imposed restrictions and work that is available.
7. Written (only) responses from physicians are necessary for communicating a medical release to return to work and/or physical restrictions after return to work.

GUIDELINES FOR RESTRICTED WORK ACTIVITY PROGRAMS

INTRODUCTION

The primary focus of loss control programs is on accident prevention. Avoid accidents and you avoid both their direct and indirect costs. Although "zero accident" goals may be commendable, they are not always achievable. A prudent manager must plan as if accidents will occur. Plans for the immediate and long term care of injured employees should include rehabilitation and eventual return to the workplace. Good planning for employees' return to work is imperative for both the employees' well being and for the control of workers' compensation costs.

As uncontrollable and prohibitive as workers' compensation rules may seem, employers still have opportunities and options to minimize costs. A restricted work activity program is such an option. These programs are sometimes referred to as modified duty, alternate duty, or light duty programs.

Some managers are not willing to accept modified duty programs because they feel productivity will be negatively affected. This attitude is shortsighted since well managed programs can consistently show far reaching benefits.

Overcoming this attitude can be as simple as instituting a program that "charges back" all workers' compensation costs to the departments which incur those costs. Too many employers do not hold department managers or supervisors accountable for these costs. Accountability is the key to inducing action.

Our intent here is not to convince managers to support restricted work programs, but to describe how these programs should be designed and implemented.

Each program should be designed to fit the management philosophy and operations of a company and not to change them. However, there are key elements which contribute to the success of any restricted work program.

STATEMENT OF POLICY

The statement of policy concerning a Restricted Work Activity (RWA) program should explain the nature and the reasons for implementing the program. The statement of policy must indicate that employees who are temporarily or partially disabled due to work related injuries can return to work in a restricted capacity before they are able to return to their normal duties.

The statement of policy should clearly indicate that the restricted work procedure is being implemented for the benefit of both the employee and the company. The purpose of the program may be described as:

- Reducing lost workdays associated with work related injuries.
- Controlling insurance costs related to work injuries.
- Compensating employees with a normal rate of pay instead of the reduced earnings allowed by workers' compensation programs.
- Preventing partially and temporarily disable employees from losing the "work habit".
- Expediting the medical rehabilitation of the employee by returning that employee to some level or productive work activity.

Type of Work (cont)

Provisions should be made to allow employees to perform different job classifications, and even to transfer temporarily to different departments where appropriate productive activity is available. Changing work shifts may also be appropriate if the opportunity arises. It is important when assigning an employee to new duties, that the employee is properly trained, regardless of seniority.

Injured employees must perceive that the company is willing to "bend over backwards" to provide productive work without aggravating their condition. The more accommodating the company is, the fewer excuses an employee will have not to take part in the program. An employee inclined to avoid returning to work will be left with few excuses, particularly if the treating physician is in agreement. Since the physician's statement is the basis upon which work is assigned and permission to return to work is generated, there is little room for the injured employee to be upset with the company because he is being "forced to return to work before he is fully recovered".

Separate areas or jobs can be set up in the plant to accommodate restricted work employees without upsetting the system, or creating employee relations problems. Rework and inspection of products in process are very conducive to this program. It is suggested that this work be set apart from mainstream operations.

Many workers find restrictive work activities mundane and boring. As a result, you may find that employees will be approaching the company to get a release to their regular duties. If this happens, you must be sure to get medical documentation from the treating physician before making the change.

Communicating with Physicians:

As mentioned earlier, a company physician can often be a useful ally in communicating with the injured employee's treating doctor. Physicians are often more candid with one another than they might be when discussing a patient with a lay person.

It is necessary to inform physicians of your program and explain that your intent is to more fully rehabilitate the employee - not aggravate the condition.

The physician must also be advised that the program will not interfere with his medical treatment of the worker. For instance, provision should be made for employees to leave work early, or leave work for some period during the workday, in order to receive proper medical attention or therapy.

Physicians should be contacted in person to explain the program. The personal contact will give them a better impression of your intentions and it will also allow you to become more familiar with the physician. You may also consider inviting the physician to visit the workplace. Sometimes, physicians regard company management as the "bad guys" because it is often the only impression they get from their patients.

Following the personal contact, the administrator of the program should send a copy of the policy and procedures to the physician with a cover letter which explains the intent of the program in terms of the injured employee.

Communicating with Physicians: (cont)

In smaller communities this process can be quite advantageous, since there are only a limited number of physicians. This is more difficult in a metropolitan area because of the large number of physicians involved. In any case, a letter and telephone contact should be made to physicians soon after the employee has been injured and treated. By taking this approach on a case-by-case basis, you will soon find that many physicians will understand and work with your program.

Keep in mind that physicians are a very tight fraternity. If one physician is impressed with a company's program, they will tell other physicians about it.

Dealing with Labor Unions:

Restricted work programs are possible in both union and non-union environments. It is generally considered more difficult to implement such a procedure in a union environment. There is an impression that the union will fight any attempt to return people to work at jobs other than those in which they have formal bids.

By involving the union organization in the development of the program, many problems and objections can be avoided. Acceptance by the union can also ensure that your program is not in violation of the labor agreement.

Workers should be advised that their participation in the restricted work program does not insulate them from normal lay-off procedures.

Conclusion:

Restricted work activity programs are an effective strategy for controlling workers compensation costs. When properly administered, such programs speed the return of injured workers to productive employment and reduce the costs associated with worker injuries.

SAFETY AGREEMENT

(The contents contained here within, are not intended to be all-inclusive, nor are they to be a definitive checklist to instruct performance on a job site. At any desired time, or as needed, a Mikalan Roofing safety representative and the employee or subcontractor will discuss safety concerns.)

“I HAVE READ AND UNDERSTAND THE STANDARDS SET FORTH FOR EMPLOYEES AND SUBCONTRACTORS WORKING FOR MIKALAN ROOFING INC. AS AN EMPLOYEE OR SUBCONTRACTOR OF MIKALAN ROOFING I AGREE, BY SIGNING BELOW, THAT I HAVE READ AND UNDERSTAND THE CONTENTS OF THE MIKALAN ROOFING WRITTEN SAFETY PROGRAM AND AGREE TO ADHERE TO THE RULES AND GUIDELINES IT CONTAINS.”

Signed by:

Employee/subcontractor:

Signature: _____ Date _____

Print Name: _____

Mikalan Roofing Inc.:

Signature: _____ Date _____

Print Name: _____