



B.G. Brecke, INC.
Safety Manual

11/01/2024

B.G. Brecke, Inc. Safety Commitment Statement

B.G. Brecke, Inc. holds a vital interest in the Safety and Well-being of our employees, customers, visitors, vendors, and the general public by striving to achieve the highest standards of safety in everything we do.

We are committed to cultivating a “Safety Always” mindset which helps us achieve a healthy, safe, drug & alcohol-free workplace. Safety does not occur by chance, so it is the responsibility of every employee to focus on ways of preventing workplace accidents and injuries by maintaining a safe operation through organized, clean, and efficient practices while diligently following all safety processes and procedures set forth by Brecke Mechanical every day.

Our Safety Program has been developed to ensure full compliance with all federal, state, and local safety and occupational health regulations and laws with emphasis on the Occupational Safety and Health Act Of 1970 and all OSHA requirements that apply to our operations.

This Safety Manual will describe some of the safety expectations we have for our employees and more importantly what you can expect from us regarding your safety, the safety of our customers, vendors, and the general public. We encourage all employees to reach out at any time to the Safety Team, your supervisor(s), or Human Resources with any questions that may arise. B.G. Brecke, Inc. is always looking for cutting-edge safety ideas and we encourage all employees to provide innovative recommendations for a safer work environment.

We know you will work hard to keep yourself and others safe while having an exciting, fun, and rewarding experience at B.G. Brecke, Inc.

Sincerely,

A handwritten signature in black ink that reads "Brad Brecke". The signature is written in a cursive, flowing style.

President

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SECTION 1: DEFINITIONS

- A. **ANSI (American National Standards Institute):** The ANSI works in close collaboration with stakeholders from industry and government to identify and develop U.S. voluntary standards.
- B. **BAT (Breath Alcohol Technician):** A BAT refers to a certified individual who may conduct a breath analysis for drug screening/testing.
- C. **Brecke Mechanical Premises:** Shall refer to any owned, leased, or rented facilities, warehouses, buildings, grounds, equipment, vehicles, parking areas, work sites, and any area used by Brecke Mechanical to conduct its business.
- D. **Brecke Mechanical:** B.G. Brecke, Inc. hereafter shall be referred to as Brecke Mechanical
- E. **ClearingHouse (FMCSA ClearingHouse):** The ClearingHouse is an online database that gives employers and government agencies real-time access to information about CDL drivers and drug and alcohol program violations.
- F. **Company Equipment:** Shall refer to any Brecke Mechanical owned, leased, or rented equipment used by Brecke Mechanical to conduct its business.
- G. **Company Vehicle:** Shall refer to any Brecke Mechanical owned, leased, or rented vehicle used by Brecke Mechanical to conduct its business.
- H. **Competent Person:** An individual capable of identifying existing hazards, predicting future hazards, and having the authority to correct the hazards. A competent person must have relevant knowledge of applicable standards.
- I. **DART (Days Away, Restricted, or Transferred):** DART refers to the method used to help determine the number of workplace injuries and illnesses that required employees to miss work, perform restricted work activities, or transfer to another job within a calendar year.
- J. **DER (Designated Employer Representative):** The DER refers to the Safety Team Leader
- K. **DOT (Department of Transportation):** The DOT is a government agency that delivers a transportation system that serves the American people and economy through safe, efficient, sustainable, and equitable movement of people and goods.
- L. **EBT (Evidential Breath Testing):** EBT device refers to a device that measures the breath alcohol concentration (BAC) of a person through his/her breath.
- M. **EMR (Experience Modification Rate):** EMR refers to the calculation used by insurance firms to price the cost of workers' compensation premiums. The rating offers a prediction of future risk.
- N. **ESD (Electronic Smoking Device):** ESD refers to any E-Cigarette, e-cig, vapes, vape pen, hookah, e-hookahs, Electronic Nicotine Delivery System (ENDS), and any other device that omits vapor regardless of appearance or name.
- O. **FMCSA (Federal Motor Carrier Safety Administration):** FMCSA refers to the DOT Operating Administration that works with federal, state, and local enforcement agencies, the motor carrier industry, and labor and safety interest groups to improve safety information systems, motor vehicle technologies, and operating standards.
- P. **HazCom (Hazard communication):** HazCom is a set of processes and procedures to effectively communicate hazards associated with chemicals during handling, shipping, and any form of exposure.
- Q. **IDLH (Immediately Dangerous to Life and Health situation):** Refers to any situation that poses immediate dangers to life and health.
- R. **Incident:** Shall refer to any occurrence that could result in inappropriate physical contact, injury to an individual, and/or damage to a building, vehicle, or equipment.
- S. **LAB:** Refers to the SAMHSA-approved laboratory designated by the collection facility.
- T. **Licensed Healthcare Professional:** Shall refer to a licensed healthcare provider who specializes in substance abuse.

- U. **LOTO (Lockout/Tagout)**: LOTO Out refers to the safety procedure to prevent accidental release of energy.
- V. **LWR (Lost Workday Rate)**: LWR is the standard metric that provides a measure of the total number of working days lost within a workplace due to occupational injury or illness.
- W. **MCAI (Mechanical Contractors of Association of Iowa)**: MCAI provides valuable services and resources to members and industry fund contributors.
- X. **Medcor**: Injury triage service provided by licensed healthcare professionals.
- Y. **MRO (Medical Review Officer)**: MRO The is a licensed physician who is responsible for receiving and reviewing laboratory results generated by an employer’s drug testing program.
- Z. **MVR (Motor Vehicle Report)**: An MVR is requested to verify potential and current employees’ driving history to determine eligibility to drive for Brecke Mechanical.
- AA. **OSHA (Occupational Safety & Health Administration)**: OSHA The is a government organization created to ensure safe and healthful working conditions for workers by setting and enforcing standards and by providing training, outreach, education, and assistance.
- BB. **PJHA (Pre-Job Hazard Analysis)**: PJHA is the form utilized to assess and document potential hazards, hazard mitigation, and to assess PPE needed for working safely.
- CC. **POC (Point of Contact)**: POC Is an individual who will be responsible for a customer, visitor, or vendor.
- DD. **PPE (Personal Protective Equipment)**: PPE is worn to minimize exposure to hazards that cause serious workplace injuries and illness.
- EE. **Safety Sensitive Position**: A job or position where the employee holding this position has the responsibility for his/her own safety or the safety of others. Safety-Sensitive positions will be defined by Brecke Mechanical management.
- FF. **SAMSHA (Substance Abuse and Mental Health Services Administration)**: SAMSHA is a branch of the U.S. Department of Health and Human Services that leads public health efforts to advance the behavioral health of the nation.
- GG. **SAP (Substance Abuse Professional)**: SAP is a licensed or certified professional who has the knowledge for the diagnoses and treatment of alcohol and controlled substance-related disorders. A pre-approved SAP provider list is located in the Training Vault and on the Company Drive.
- HH. **SDS (Safety Data Sheets)**: SDS’s are comprehensive documents containing detailed information about a specific substance or mixture used in workplaces.
- II. **Shall**: The use of shall in this manual refers to mandatory action.
- JJ. **TPA (Third-Party Administrator)**: A TPA is an authorized administrator to process and support Brecke Mechanical’s drug and alcohol policy.
- KK. **TRIR (Total Recordable Incident Rate)**: TRIR is the safety metric developed by OSHA used to compare and benchmark safety performance.

SECTION 2: RESPONSIBILITIES & OSHA RIGHTS

2.1 SAFETY TEAM RESPONSIBILITIES

- A. The Safety Team will be responsible for:
 - 1) Completing scheduled and random audits and inspections.
 - 2) Evaluating sites, equipment, work areas, and worker techniques to discover opportunities for improvement and injury potential.
 - 3) Will provide guidance, assistance, enforcement, and compliance of all safety programs, policies, procedures, and regulations as established by Brecke Mechanical policies and procedures, the MCAI, our customers, the federal, state, and local laws, and regulations.

- 4) Work with management to facilitate any needs that may be specific to a job site/customer beyond that outside of a normal situation.
 - 5) Be responsible for procuring proper safety equipment.
 - 6) Investigate work-related injuries and illnesses and ways to reduce the chance of occurrence and/or recurrence.
 - 7) Design safety training such as weekly Toolbox Talks and other forms of safety communication. These methods of communication are provided to all Brecke Mechanical employees with vital safety information such as safe work practices, safety hazards, and how to reduce risk.
- B. The Safety Team Leader will be responsible for:
- 1) Managing and overseeing the Safety Team.
 - 2) Acting as the delegated authority and program administrator to develop, monitor, evaluate, and implement Brecke Mechanical's health and safety policies, procedures, and safety programs.
 - 3) Taking charge of a major incident and leading all parties involved through the steps in the process, such as who to contact and available medical treatment locations.

2.2 SAFETY REPRESENTATIVE RESPONSIBILITIES

- A. Brecke Mechanical's Safety Representatives have the right to exercise judgment and take necessary action to operate the business of Brecke Mechanical by administering the policies, practices, and procedures of this Safety Manual.
- B. Safety Representatives may remove an employee from a job or task if the employee is observed to be emotionally, physically, or mentally unfit to perform their job safely.
- C. Brecke Mechanical's Safety Representatives include:
 - 1) Supervisor(s)
 - 2) Team Leader(s)
 - 3) Superintendent(s)
 - 4) Foremen(s)
 - 5) Human Resources
 - 6) Brecke Mechanical Officers (Brad Brecke and Bret Brecke)

2.3 EMPLOYEE RESPONSIBILITIES

- A. It is every employee's responsibility to be a safety advocate for themselves, other team members, our customers, vendors, and the public.
- B. Additional employee responsibilities (include, but are not limited to):
 - 1) Understand and follow all Brecke Mechanical, federal, state, local, organizational, customer, and OSHA laws, regulations, standards, policies, and procedures. If any differs from Brecke Mechanical requirements, the more stringent shall take precedence.
 - 2) Shall wear all required PPE as instructed.
 - 3) Accidents, injuries, near misses, and illnesses; no matter how minor it may seem at the time shall be reported to the supervisor(s) and safety team immediately and no later than 24 hours after the incident occurred.
 - 4) Any accident/injury that occurred outside of work that may affect what and/or how work can be performed/completed must also be reported to your supervisor(s) and the Safety Team immediately or within 24 hours.
 - 5) Employees are required to arrive on the job ready to work every day in a mental and physical condition fit for duty, that will allow them to perform their job safely. Some

examples include but are not limited to wearing proper clothing for the elements you will be working in (e.g. hot and humid, below zero temperature).

- 6) Employees shall notify their supervisor(s) and/or the Safety Team immediately if their work may be affected or they are unable to perform their duties safely for any reason including but not limited to fatigue or adverse effects of a newly prescribed medication.
 - 7) Keep all food and consumable items in sealed containers and away from areas with potential contamination that may cause health concerns.
 - 8) Be well-groomed to prevent any safety hazards. Ensure clothing and shoes/boots are not in disrepair providing unsafe skin exposure. Keep hair, clothing, and jewelry pulled back and/or tucked in. Shorts are **NOT** permitted.
 - 9) Do not engage in workplace violence; it will not be tolerated. The full Zero Tolerance Violence Free Workplace policy is outlined in the Employee Handbook.
 - 10) Maintain confidentiality of Brecke Mechanical and customer information and trade secrets.
 - 11) Complete all inspections in accordance with the policies outlined in this manual, and never use tools, equipment, or vehicles until all deficiencies are corrected.
 - 12) Dispose of all products in accordance with the manufacturer's guidelines. Maintain environmentally safe disposal processes by recycling whenever possible.
 - 13) Follow all safe, reasonable, and legitimate management directives.
 - 14) Ensure the success of our safety program by being alert and committed to fostering a safe work environment. Never assume an area/task is safe until verified.
- C. Employees in violation of any policy or procedure will be asked to correct the unsafe behavior. Refusal may result in being removed from the job site immediately as well as disciplinary action, up to and including termination of employment.

2.4 EMPLOYEE RIGHTS UNDER OSHA

- A. Any employee has the authority to stop work as outlined in section 3.5.
- B. Employee Rights Under Federal OSHA:
 - 1) Right to notify your employer or OSHA about workplace hazards. You may ask OSHA to keep your name confidential.
 - 2) Right to request an OSHA inspection if you believe that there are unsafe and unhealthful conditions in your workplace. You have the right to have a representative contact OSHA on your behalf.
 - 3) You or your representative may participate in the inspection and speak to the inspector.
 - 4) Receive information and training on the job hazards including all hazardous substances in the workplace.
 - 5) File a complaint with OSHA within 30 days of retaliation or discrimination by your employer for making safety and health complaints or for exercising your rights under the OSHA Act.
 - 6) Right to see OSHA citations issued to your employer. Your employer must post the citations at or near the place of alleged violation for at least 3 working days.
 - 7) Right to copies of your medical records or records of your exposure to toxic and harmful substances or conditions.
- C. Additional Employee Rights Under Iowa OSHA:
 - 1) A safe Workplace
 - 2) Raise a safety or health concern with your employer or OSHA, or report a work-related injury or illness, without being retaliated against.
 - 3) Receive information and training on the job hazards including all hazardous substances in the workplace.

- D. You must comply with all occupational safety and health standards issued under the OSHA Act. that apply to your own actions and conduct on the job.

2.5 EMPLOYER RESPONSIBILITIES UNDER OSHA

- A. Must furnish your employees a place of employment free from recognized hazards.
- B. Must comply with the occupational safety and health standards issued under the OSHA Act.

2.6 SUBCONTRACTOR/GENERAL CONTRACTOR(S) RESPONSIBILITIES

- A. Subcontractor(s) shall take responsibility to be a safety advocate for themselves, our employees, customers, vendors, and the public.
- B. Subcontractors' responsibilities (include, but are not limited to):
 - 1) Must be competent, capable, and hold appropriate licenses, certifications, registration, and insurance to perform the required work safely and in an environmentally sound manner.
 - 2) Will complete the prequalification process by providing for review all safety programs, training documentation, and proof of safety statistics at or below the industry average. (TRIR, DART, LWR, EMR, and Fatalities).
 - 3) Attend all pre-job meetings and safety orientations.
 - 4) Prior to performing work, a site orientation shall take place. Site Orientations include, but are not limited to:
 - a) Establish clear communication lines.
 - b) Clear roles, and responsibilities
 - c) Complete a PJHA with a full safety inspection.
 - d) Establish an emergency action plan.
 - 5) Discuss any safety concerns with the Safety Team immediately.
 - 6) Follow all safe reasonable and legitimate management directives.
 - 7) Ensure the success of our safety program by being alert and committed to fostering a safe work environment.

SECTION 3. GENERAL SAFETY

3.1 SAFETY ORIENTATION

- A. All employees shall go through orientation and any required training for their position or the job site they will be working at. Orientation/training shall include policies, procedures, and potential hazards specific to Brecke Mechanical as developed with MCAI prior to or when starting work for Brecke Mechanical.
- B. Safety orientation topics (include, but are not limited to):
 - 1) PPE (general)
 - 2) First Aid
 - 3) Fire Prevention
 - 4) Emergency Procedures
 - 5) Tool Safety
 - 6) Special Hazards include, but are not limited to:
 - a) Asbestos
 - b) Silica
 - c) Lead

- d) Hexavalent chromium
- 7) HazCom Standard & Binderworks
- 8) Waste disposal/environmental consciousness
- 9) Energized work & Lockout/Tagout
- 10) Material Handling include, but are not limited to:
 - a) Proper Lifting Techniques
 - b) Hazard assessment prior to lifting.
 - c) Findings from previous lifting accidents.
 - d) Team lifts or lifting equipment (such as carts) shall be used whenever possible.
- 11) Rigging
- 12) Fall Protection including, but not limited to:
 - a) Recognition
 - b) Elimination of fall hazard
- 13) Ladders/Lifts
- 14) Scaffolding
- 15) Excavation
- 16) Confined Space
- 17) Hot work
- C. Brecke Mechanical specific training topics (include, but are not limited to):
 - 1) Safety Team
 - 2) Safety Manual
 - 3) OSHA Rights
 - 4) Training Vault
 - 5) PPE (Brecke Mechanical provided)
 - 6) Noise Awareness
 - 7) Emergency Action Plan
 - 8) Fall Protection
 - 9) Confined Space
 - 10) HazCom Specifics
 - 11) Incident Reporting
 - 12) Risk/Hazard Identification including PJHA and stop work authority.
 - 13) Site-specific tasks, procedures, hazards (if applicable)

3.2 DOCUMENTATION/RECORDKEEPING

- A. Brecke Mechanical is dedicated to protecting all confidential material we are required by law to keep on every employee. Please refer to the handbook for the full documentation, retention, and request process.
- B. Because personnel files contain confidential information, the only people who will have access to them are the individuals with a legitimate business need.
- C. Safety Related Record Retention:
 - 1) All training records: 5 years from the completion date.
 - 2) Historical safety data and air sampling: 5 years from the date recorded.
 - 3) OSHA 300 and 300A Logs: 5 years from the reporting date.
 - 4) Medical Records are kept for 7 years after termination of employment unless an extended retention date is required such as for Bloodborne pathogens: 30 years from employee termination date.
- D. Safety Training Records Shall Include:
 - 1) Employee name.

- 2) Training content and completion date.
 - 3) Trainer/Instructor/Facilitator name.
 - 4) Any other documentation required.
- E. All employee training/certifications are kept secure in but not limited to:
- 1) Learning Management Systems (LMS) such as:
 - a) Avetta
 - b) Gatefeed
 - c) ISN
 - d) TappiSafe
 - e) Training Vault (managed by MCAI)
 - 2) Personnel files in locked file cabinets
 - 3) With Brecke Mechanical designated TPA and/or the Safety Team.
- F. OSHA Recordables:
- 1) OSHA Recordables as defined by 29CFR1904 (7) shall be:
 - a) Documented on the 300 Log within 7 days of the incident.
 - b) If applicable the signed OSHA 300A Logs shall be posted by the labor law posters for each Brecke Mechanical premises from February 1st to April 30th each year.
- G. Medical & Exposure:
- 1) Incidents involving harm to any employee shall be triaged through Medcor Services.
 - 2) Medical records that will be kept separate from training records (include, but are not limited to):
 - a) Employee exposure monitoring
 - b) Medical surveillance and exams

3.3 TRAINING

- A. All initial training will be conducted when, but not limited to:
- 1) Prior to initial assignment, exposure, entrance of a safety-sensitive area, and/or prior to use of equipment such as fall protection, PPE, and respirators or as required.
 - 2) When there are site-specific items and special hazards.
 - 3) It is determined through the pre-job meetings such as the PJHA, where training has not already occurred.
 - 4) Prior to being assigned a new role in confined space operations.
- B. Retraining will be conducted when, but not limited to:
- 1) Monthly, annually, or periodically as required by the customer, or federal, state, and local laws, and regulations.
 - 2) Initial training has been deemed ineffective.
 - 3) Non-compliance with rules and regulations.
 - 4) Employee was involved in an incident.
 - 5) Incorrect completion of a checklist or document (permit, PJHA, etc.)
 - 6) Changes/deviations have been made in or to:
 - a) The policy and/or procedures
 - b) Training material
 - c) The hazards presented.
 - d) The equipment
 - e) The plan/permit
 - 7) There was an incident where:
 - a) Proper safety precautions were not followed.
 - b) Equipment was misused or not used.

- 8) Employee fails to demonstrate knowledge and understanding of:
 - a) The safety hazards.
 - b) Equipment safety
 - c) Safety process

3.4 INSPECTIONS/TESTS

- A. All job sites, tools, equipment, and vehicles shall be subject to inspection and/or testing.
- B. All inspections/tests will be conducted, but not limited to:
 - 1) In accordance with the requirements set forth by the manufacturer and all applicable customer, federal, state, and local laws, regulations, and guidelines unless stated differently elsewhere in this manual.
 - 2) Frequency may include the following, but not limited to:
 - a) Daily prior to use
 - b) Prior to use after breaks (If applicable)
 - c) Prior to storage at the end of each day
 - d) Immediately after an incident
 - e) Monthly
 - f) Annually
- C. Documentation of inspections/tests may include the following, but are not limited to:
 - 1) The Date inspection/test was completed.
 - 2) Equipment, tool, vehicle, and job site being inspected/tested.
 - 3) Employee(s) name who completed inspection/test.
 - 4) Location
 - 5) Employee(s) on site
 - 6) Task(s) being performed.
- D. Equipment is defined as damaged/defective:
 - 1) Having failed, missing, or damaged parts such as ground plugs.
 - 2) Worn, frayed, pinched, or overheated cords.
 - 3) Excessive rust or corrosion, cracked, split, or broken material causing a safety hazard.
 - 4) Manufacturer recalls.
 - 5) Ladder rungs are not parallel & level.
 - 6) A seal is damaged or defective and no longer provides a protective barrier from hazards.
 - 7) Parts that do not operate properly resulting in a safety hazard.
 - 8) Failed any portion of the required inspection/test as described by the manufacturer.
- E. All damaged and/or defective equipment shall be tagged and removed from service immediately.
- F. Replacement items may be requested from your supervisor(s) and/or the Safety Team.
- G. Inspection sheets shall be turned into the Safety Team and/or the customer (if required) either electronically or physically upon request, weekly, or upon completion of the job.
- H. When damage, defects, and needed repairs are promptly reported, it can prevent the deterioration of tools, equipment, and vehicles. It also prevents possible damage to property and possible injury to employees, customers, vendors, and the general public.
- I. Tools, equipment, and vehicle inspection shall consist of:
 - 1) Visually observing behavior(s), inspecting tools, equipment, and vehicles.
 - 2) Ensuring the area is clear of hazards that may cause injury to the operator, other individuals on site, or cause the tool(s), equipment(s), or vehicle(s) to become damaged, react with the environment, or become unstable and/or tip over.
 - 3) All inspection/testing equipment shall be calibrated per the manufacturer's guidelines and at required intervals.

- 4) Inspect and test all functions of the tool(s), equipment(s), or vehicle(s) including but not limited to:
 - a) Safety Mechanisms
 - b) Controls
 - c) Levers
 - d) Backup alarms
 - e) Lights
 - f) Seals on PPE such as respirators, tools, and equipment
 - 5) Ensure manufacturer markings/safety stickers, load limits, and labels are legible and clearly marked or defined.
 - 6) Completing an inspection sheet when required by Brecke Mechanical, the customer, federal, state, or local agencies.
 - 7) Tool(s), equipment(s), and/or vehicle(s) are clean, free from debris, grease, oil, or any other hazard.
- J. Job site inspection shall consist of:
- 1) Visually observing job sites.
 - 2) Inspect the site to ensure it is clear of hazards.
 - 3) Ensure all safety guards are in place.
 - 4) Verify the PJHA has been completed.
 - 5) Complete/verify inspection sheets have been completed correctly and are in the designated location (office, on equipment, in vehicle, etc.).

3.5 STOP WORK PROCEDURE

- A. All employees, customers, and vendors have the authority to initiate “Stop Work” without fear of reprimand, disciplinary action, or retaliation.
- B. Stop Work shall be initiated if/when, but not limited to:
 - 1) A situation has the potential to result in injury, illness, or death.
 - 2) Safe Work procedure dictated by PJHA, customer, General contractor, Brecke Mechanical, federal and state regulations are not being followed by one or more employees.
 - 3) New or potential hazards have been identified during the work.
 - 4) The act, incident, or situation has not been properly assessed for risk of putting employees in harm’s way due to unknown risk factor(s).
 - 5) Any “Stop Work” criteria listed on the PJHA have been met.
- C. Once work has stopped, when required all affected employees and the Team Leader shall be notified of the reason for stopping work. The site supervisor or the Team Leader shall notify the Safety Team and the customer (if necessary) and together the “Stop Work” issue(s) shall be corrected immediately. No work shall be performed until all concerns and issues have been resolved.
- D. When required, once the issue(s) is/are resolved the site supervisor, Team Leader, or the Safety Team will update the PJHA to outline the correction(s) made and will review the correction(s) with the affected employees before work may resume.
- E. When required, the Team Leader and the Safety Team will conduct a follow-up inspection to ensure there is no needed modification to the corrections made or recurrence of the hazard.

3.6 SAFE BEHAVIOR

- A. Safe behavior is vital to ensuring the success of the safety program. Any employee observed to be engaging in unsafe behavior or not fit for duty shall be removed from the job site immediately.
- B. Expected SAFE Behavior (including, but not limited to):

- 1) Be aware of your surroundings.
- 2) Maintain a clean work area by cleaning as you go removing trash and debris immediately.
- 3) Familiarize yourself and complete any required training before performing a new/unfamiliar task.
- 4) Obeying all safety signage, tape, and painted areas such as but not limited to:
 - a) OSHA postings
 - b) Safety walkways
 - c) Designated storage areas
 - d) Danger **(RED)** Tape (May be crossed only when permission has been given by the individual in charge of the taped-off work area).
 - e) Caution **(YELLOW)** Tape (May be crossed only when the area has been checked for potential hazards and has been deemed safe to enter) You must understand what hazards to look for prior to entering the work area.
 - f) Use proper color-coded labels for piping to show contents.
- 5) Properly wear appropriate PPE including seat belts for the task being performed.
- 6) Paint in assigned areas that are outside or in well-ventilated areas.
- 7) Dispose of all products in proper containers in accordance with the manufacturer's guidelines.
- 8) Follow all safety standards, procedures, and guidelines in accordance with the policies outlined in this manual.
- 9) Respect all individuals and do not engage in threatening behavior such as intimidation or fighting.
- 10) Do not Engaging in Horseplay (including, but not limited to):
 - a) Running
 - b) Throwing tools
 - c) Scuffling
 - d) Practical jokes
- 11) Operating equipment and/or using tools in a manner as intended by the manufacturer.
- 12) Do not remove, tamper, or operate tools and/or equipment without safety guards.

3.7 PROGRESSIVE DISCIPLINE

- A. Refer to the Employee Handbook for the full Progressive Discipline process.
- B. UNSAFE conduct that may lead to disciplinary action (include, but are not limited to):
 - 1) Pressuring an individual to perform unsafe act(s) such as horseplay or misuse of tools and equipment.
 - 2) Retaliating against an individual for exercising their right to report an incident, unsafe working conditions, or unsafe behaviors.
 - 3) Failing to report and remove any defective tools or equipment from service immediately. Failing to report an incident immediately or within 24 hours of the incident.
 - 4) Causing a hazardous or dangerous situation.
 - 5) Not reporting a hazardous or dangerous situation.
 - 6) Not correcting a hazardous or dangerous situation when it is within your power to do so.
 - 7) Not maintaining a neat, clean, safe, and healthy environment.
 - 8) Revealing or violating the confidentiality of Brecke Mechanical and/or customers' secrets.
 - 9) Reveling, releasing, or violating the confidentiality of potential or current employees' medical records and/or drug/alcohol screen/test results.
 - 10) Violating the Drug and Alcohol Policy (DOT 49 CFR §40.321 and Iowa Code 730.5).

3.8 RETURN TO WORK: POST-INJURY OR ILLNESS

- A. Brecke Mechanical works hard to support employees during their recovery from illness or injury. It is the responsibility of the employee to provide their treating physician with an accurate job description to ensure proper safety precautions and restrictions are being made when needed.
- B. Each situation shall be dealt with on a case-by-case basis. The Safety Team Leader will work closely with the direct supervisor(s) and Human Resources to determine what accommodations can be made to ensure continued safety upon an employee's return to work.
- C. Employees may return to work under the following conditions including but not limited to:
 - 1) Return to Work **Without** Restrictions - Work-Related or Non-Work-Related Injury or Illness:
 - a) Employees may return to work once their treating physician has released them to full duty.
 - b) Employees must provide a copy of the release to the Safety Team Leader or Human Resources before they may begin work.
 - 2) Return to Work **With** Restrictions
 - a) Work-Related illness or injury:
 - i. Employees may return to work once their treating physician has released them with restrictions.
 - ii. Employees must provide a copy of the release with detailed restrictions from their treating physician to the Safety Team Leader or Human Resources.
 - iii. The Team Leader shall decide what work can be performed safely in consultation with the Safety Team and Human Resources.
 - b) Non-Work-Related illness or injury:
 - i. Employees may return to work once their treating physician has released them with restrictions so long as the restrictions do not cause undue hardship to the team or Brecke Mechanical operations.
 - ii. Employees must provide a copy of the release with detailed restrictions from their treating physician to the Safety Team Leader or Human Resources.
 - iii. If reasonable accommodations cannot be made, the employee may not return to work until their treating physician provides restrictions that can be reasonably accommodated or until they are released to full duty.
 - c) At any time if the restricted workload becomes too much, the employee is responsible for stopping the task immediately and is required to report to their supervisor(s) and the Safety Team for next steps.
- D. Employees may be subject to a 'Return to Duty' drug test as outlined in section 14.4.0.4.

SECTION 4: PERSONAL PROTECTIVE EQUIPMENT (PPE)

4.1 PPE GENERAL GUIDELINES

- A. Our Safety Team assesses safety standards set by OSHA and other entities in the field to ensure every employee and subcontractor is fully equipped with the correct PPE (standard or above standard) for the job they will be performing.
- B. Acceptable PPE is determined by, but not limited to:
 - 1) OSHA, federal, state, and local, standard code, or law
 - 2) PJHA

- 3) Scope of work
- 4) Customer requirements
- 5) Safety audits
- C. Brecke Mechanical's Safety Team will purchase and supply all employees with the necessary PPE as required by OSHA 1926.95.
- D. Standard field PPE supplied by Brecke Mechanical:
 - 1) Hard Hat
 - 2) Safety Glasses
 - 3) Gloves
- E. PPE NOT supplied by Brecke Mechanical including, but not limited to:
 - 1) Safety composite-toed/steel-toed shoes or boots.
 - 2) Pants
 - 3) Winter coats, jackets, parkas, raincoats
 - 4) Winter gloves
 - 5) Rubber and/or winter Boot
 - 6) Hats
 - 7) Sunglasses and/or Sunscreen
- F. Proper pre- and post-wear inspections must be performed as outlined in section 3.4 on all PPE.
- G. Every employee required to wear PPE shall be trained on the required PPE prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Location
 - 2) Limitations
 - 3) Proper use, wear, selection & fit (adjustments and features if applicable)
 - 4) Proper care, inspections, maintenance, and end-of-life disposal.
- H. All PPE must be kept clean and in good operating condition. If a replacement is needed due to normal wear and tear, damage, or defect, employees are to remove the unsafe PPE from service immediately and reach out to their supervisor or the Safety Team for replacements.
- I. It is the responsibility of every employee to maintain and wear all PPE according to the manufacturer's specifications.
- J. Employee-owned equipment shall meet the same requirements as PPE provided by Brecke Mechanical and must be approved by the Safety Team Leader prior to use. Brecke Mechanical is not responsible for personal equipment and will not pay to replace any personal equipment you choose to use.
- K. Employees may request an evaluation of a job site or equipment if they are unsure of what PPE best supports the required task or if they feel the PPE currently used does not provide adequate protection.
- L. Brecke Mechanical will supply every visitor with any required PPE for their visit except for the items outlined in section 4.1.E.

4.2 HARD HATS

- A. Brecke Mechanical will issue an approved hard hat with a Brecke Mechanical logo on the front (no competitor logo may be worn). The Brecke Mechanical Logo must always be front-facing and visible.
- B. Only properly rated stickers may be applied to the hard hat.
- C. Hard hats shall be worn at all times if there is potential for a head injury due to, but not limited to:
 - 1) Impact
 - 2) Electrical shock/burn
 - 3) Falling/flying objects
 - 4) Work performed on or near a road.

4.3 EYE & FACE SHIELD PROTECTION

- A. There may be jobs that will require the use of safety glasses or other types of eye & face shield protection. To ensure a safe work environment all safety eye & face shield protection must meet or exceed the approved safety rating of **ANSI Z87+**.
- B. Brecke Mechanical will issue face shields, safety glasses, or over-glasses that meet or exceed the current ANSI safety rating.
- C. Employees may wear prescription glasses with side shields that meet or exceed the current ANSI safety rating.
- D. Tinted eye protection may be worn if performing work outside and must be removed immediately when asked.
- E. Tinted eye protection must be switched out for clear lenses when performing work inside.
- F. Transition lenses are not acceptable.

4.4 BOOTS/SHOES

- A. To ensure a safe work environment all safety footwear must meet or exceed the approved safety rating of **ASTM F2413** and must not have ground-down steel or holes that unsafely expose the foot.
- B. Employees are responsible for purchasing their own safety composite-toed/steel-toed shoes/boots.
- C. If a job site requires metatarsal boots, Brecke Mechanical will pay up to \$175 per pair.
- D. Other specialty boots will be provided by Brecke Mechanical as required.

4.5 GLOVES

- A. All cut-resistant safety gloves must meet or exceed the approved safety rating of **ANSI A4 Cut Rating**.
- B. Types of gloves that may be required:
 - 1) Cut-resistant gloves that meet or exceed the ANSI rating.
 - 2) Leather gloves must be worn for heat-hazard jobs.
 - 3) Welding, soldering, and grinding require thermal protection gloves to be worn.
- C. Gloves must be free from holes which expose the skin to safety hazards.

4.6 HI-VISIBILITY (HI-VIS) CLOTHING

- A. Brecke Mechanical jobs such as working on roadways/railways, around roadways/railways, or around heavy equipment require the use of Hi-Vis clothing or vests.
- B. Approved rating for Hi-Vis clothing or vest:
 - 1) **ANSI yellow** clothing or vest must be worn after sunrise and before sunset.
 - 2) **ANSI yellow with retro-reflective** clothing or vest must be worn after sunset and before sunrise.
 - 3) Vest must be a 5-point breakaway style with a minimum rating of **SE (Self Extinguishing)**

4.7 FALL PROTECTION

- A. Brecke Mechanical jobs may require the use of fall protection. Brecke Mechanical will issue and train all employees required to wear fall protection on OSHA and ANSI-required fall protection. Employees are required to adhere to and wear all fall protection as intended by the manufacturer's regulations

and guidelines. Employees must understand and adhere to the limitations fall protection has due to fall protection calculations.

- B. Employees must wear fall protection:
 - 1) When working at least 6 feet above a lower level or over dangerous equipment and machinery.
 - 2) On a rooftop where there is no fall protection system such as high walls or guardrails.
 - 3) At any time working in an area not within a controlled access zone/designated area per OSHA standard 1910.28(b)(13).
 - 4) Any time fall protection is required by a customer.
 - 5) When working in the basket of an aerial lift.
 - 6) Any time a PJHA determines that fall protection is needed.
- C. Employees shall not be required to wear personal fall protection when working with both feet on the deck of a scissor lift with a full guardrail system in place as provided by the lift.
- D. Every employee required to wear fall protection shall be trained on how to properly wear, utilize, and care for any required fall protection prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Training on all fall protection equipment.
 - 2) General procedure for falls, near misses, or serious incidents and the reporting process (Shall report an incident even if it is a near miss immediately or within 24 hours).
 - 3) Customer required site-specific fall protection plans.
 - 4) Suspension trauma relief device
 - 5) Any changes that have been made to the policy, initial training material, and/or equipment.
- E. Brecke Mechanical shall provide employees with all required fall protection.
- F. Annually or when subject to a load, fall protection shall be turned into the Safety Team for an in-depth inspection.
- G. In the event of a fall employees shall:
 - 1) Deploy suspension trauma relief device.
 - 2) Self-rescue and/or be rescued promptly.
 - 3) Report the fall immediately to the supervisor(s), and Safety Team.
 - 4) Immediately remove all fall protection involved in the incident from service to be inspected by the Safety Team.
- H. Safety Team will conduct an in-depth investigation for any near miss, fall, or serious incident in collaboration with Human Resources as needed.

4.8 RESPIRATORY PROTECTION

- A. Employees may be working in areas that kick up hazardous allergens such as dust and fibers.
- B. Types of respiratory protection:
 - 1) **Non-filtered dust masks** are not defined as a respirator.
 - 2) **Respirators** must meet or exceed OSHA standard 1910.134.
 - 3) **Fresh Air Systems** are to be used **Only** to provide fresh air and **NOT** respiratory relief from hazards.
- C. Non-Filtered dust masks will be provided when required by the job, OSHA, federal, state, and local, standard code, or law.
- D. NIOSH-certified Respirators shall be provided when the Safety Team has deemed it necessary based on the hazard exposure or when required by the job, OSHA, federal, state, and local, standard code, or law.

- E. Every employee required to wear a respirator shall be trained on how to properly wear, utilize, and care for any required respirators prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) The same training guidelines for all General PPE
 - 2) Respiratory Policy & OSHA standard 1910.134
 - 3) Reasons for using a respirator.
 - 4) Signs and Symptoms of respirator failure.
 - 5) Selection of the correct respirator
 - 6) Gas monitor usage.
- F. Employees who voluntarily use respiratory protection are not required to be fit tested or medically evaluated.
- G. Respirator Medical Evaluation will be conducted in accordance with the OSHA standard 1910.134 requirements and will be completed prior to being issued a respirator, if issues arise, or if an expiration is set at the prior evaluation.
- H. Medical Fit Testing will be conducted to ensure the proper fit of a respirator in accordance with the OSHA standard 1910.134 requirements and will be:
 - 1) Fit tests are only required for tight-fitting face pieces.
 - 2) Employees must pass a qualitative fit test prior to being issued a respirator and annually thereafter.
 - 3) A quantitative fit test shall be required if a qualitative fit test is not applicable for the respirator.
 - 4) Confidential records will be maintained for the most recent fit test results.
 - 5) Glasses and goggles cannot interfere with the seal of the respirator.
 - 6) Employees who are required to wear a respirator must not have facial hair that may prevent/interfere with the proper seal and function of the respirator.
 - 7) Seals shall be checked every time a respirator is donned.
- I. Respirator Inspection and Care:
 - 1) Respirators and their seals shall be inspected as outlined in section 3.4, cleaned, and disinfected upon:
 - a) Checkout
 - b) Prior to check-in
 - c) Pre- and post-use
 - d) If resistance is detected in the respirator.
 - 2) Cleaning and care must be conducted in a clean non-respirator-required area.
 - 3) Wash and change the respirator cartridge according to the manufacturer's regulations and guidelines.
 - 4) Store cleaned and sanitized respirator in the supplied bag when not in use.
- J. IDLH situation shall be treated the same as a confined space situation including, but not limited to:
 - 1) Attendant must be present.
 - 2) Communications must remain at all times.
 - 3) Rescue measures are in place.
 - 4) Supplied air respirators are required.

4.9 NOISE PROTECTION

- A. The Safety Team periodically evaluates dBA levels and makes recommendations for proper noise protection.
- B. Ear Protections must be worn while performing the following tasks:
 - 1) Welding

- 2) Cutting
- 3) Grinding
- 4) Operating and or working in the vicinity of:
 - a) Excavation equipment
 - b) Forklift
 - c) Impact tools
 - d) Powder-actuated tools.
 - e) As deemed necessary by the Safety Team or the customer such as when other heavy equipment or tools are in use.
- C. Brecke Mechanical shall provide approved ear protection with a rating of at least **NRR 25+**, higher if required.
- D. Dual protection is allowed (dBA reduction is the higher **NRR-2**) and shall be required if deemed necessary by evaluation or the customer.
- E. Ear protection with external audio input or audio Bluetooth shall not be permitted unless required by customer.
- F. Every employee required to wear noise protection shall be trained prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Training will follow the same general PPE guidelines.
 - 2) Importance of Noise Control
 - 3) Advantages and disadvantages of each type of hearing protection.
 - 4) NRR ratings
 - 5) Decibels, dual protection, and time-weighted average.
- G. The Safety Team will periodically evaluate dBA levels at each work site and make recommendations for hearing protection and audiograms. In the event an employee is exposed to levels exceeding 85dBA TWA Brecke Mechanical shall implement a hearing conservation program. Employees deemed to be affected will be required to be included in the hearing conservation program which includes:
 - 1) Baseline audiogram (within 6 months of exposure, and at least 14 hours without workplace noise).
 - 2) Annual audiograms (we will notify employees in writing within 21 days of the threshold shift re-evaluation or refitting required).
 - 3) All audiometric testing and record keeping will be kept according to all federal, state, and local laws and regulations.

4.10 SPECIALTY PPE

- A. Specialty PPE is any gear deemed necessary for the job outside of the PPE listed above.
- B. Specialty PPE will be issued by the Safety Team on a case-by-case basis if deemed necessary by the PJHA assessment or by the customer.
- C. Examples of specialty PPE include, but are not limited to:
 - 1) Specialty boots
 - 2) Specialty harness

SECTION 5: NON-CHEMICAL HAZARDS

5.1 PRE-JOB HAZARD ANALYSIS (PJHA)

- A. PJHA is the hazard assessment form that will be utilized to determine the current and potential hazards of a job.
- B. PJHA form will be completed/updated:
 - 1) Daily (more if unexpected hazards or potential hazards arise throughout the day).
 - 2) When the scope of the job has changed
 - 3) A new hazard is introduced.
 - 4) The information on the PJHA is no longer accurate.
 - 5) Stop work has been initiated.
- C. Supervisors and employees shall:
 - 1) All affected employees (workers, fire watch, attendant, etc.) shall review and sign the completed PJHA (if the signature is not legible the employee must clearly print their name next to their signature) prior to starting work on each job.
 - 2) Prior to returning to work after a “Stop Work” was initiated, any changes to the PJHA shall be reviewed by all parties.
- D. Completed PJHA forms must be turned into the Safety Team or the customer (if required) either electronically or physically at least once per week or at the end of the job.

5.2 WORK ALONE

- A. The supervisor and employee shall evaluate and discuss all risks of working alone and any needed control measures.
- B. The supervisor and employee shall establish:
 - 1) A communication schedule if necessary.
 - 2) Workers will carry a cell phone, walkie-talkie, or other acceptable communication device for the facility at all times.
 - 3) If there is no response to communication within 30 minutes of a scheduled check-in, the supervisor(s), a designated employee, or the Safety Team will go to the work site to conduct a safety check.

5.3 BLOODBORNE PATHOGENS

- A. Employees shall be provided required PPE when there is a known exposure risk.
- B. Brecke Mechanical employees are not “reasonably anticipated to be exposed” to bloodborne pathogens.
- C. Any potential exposure shall be reported to the Safety Team immediately.
- D. Any employee who is assisting in immediate first aid care of an injured employee shall use universal precautions (PPE provided at no cost to employees) including:
 - 1) Breathing barrier
 - 2) Safety glasses
 - 3) Latex and/or nitrile gloves
 - 4) Apron and/or body protection
- E. Employees shall have access to the exposure control plan (5.3.J of this section) on the company drive, the company website, or the Training Vault.
- F. Handwashing facilities or antiseptic solutions/towelettes shall be available at each site.
- G. Any time blood must be cleaned, it must be cleaned using universal precautions and using a 10:1 water: bleach mixture.
- H. Any employee who would be evaluated to have an occupational exposure shall have the option to receive the Hepatitis B vaccination at no cost.

- I. Every employee shall be trained on Bloodborne Pathogens prior to starting on a job as outlined in section 3.3; training shall include:
 - 1) OSHA standard (1910.1030)
 - 2) Brecke Mechanical policies & plan
 - 3) Bloodborne Pathogens potential exposure, how to keep safe, what to do if exposed.
- J. Bloodborne Pathogens Exposure Control Plan:
 - 1) An OSHA exposure control plan is not required due to Brecke Mechanical not having any employees in a role with an "Occupational Exposure" as defined by OSHA.
 - 2) The Safety Team shall review the need for an Exposure Control Plan annually to determine if an Exposure Control Plan compliant with OSHA regulations 1910.1030 is necessary.
 - 3) Brecke Mechanical shall follow the methods of compliance listed below:
 - a) Bloodborne Pathogens policy shall be followed including universal precautions.
 - b) Engineering controls such as sharps containers shall be provided if deemed necessary by the Safety Team.
 - c) Handwashing shall occur immediately after removing gloves and using restroom facilities, before and after eating and drinking.
 - d) Employees shall not eat, drink, smoke, apply cosmetics (lip balm, ChapStick), put in contact lenses, or store food or drinks in an area containing or potentially containing bloodborne pathogens.
 - 4) Post Exposure:
 - a) Hepatitis B Vaccine shall be available to any employee exposed at no cost.
 - i. If the Vaccine is declined, it can be received at a later date at no cost to the employee.
 - ii. Documentation of decisions shall be maintained in the employee records.
 - b) Post-exposure evaluation and follow-up shall be completed at no cost to the employee.

5.4 FATIGUE

- A. Fatigue may be caused by several factors. Brecke Mechanical works diligently to help prevent a work environment that may cause fatigue.
- B. The Safety Team shall assess fatigue control measures at least annually.
- C. Employees who work 14 or more consecutive hours, shall have at least 8 hours of rest time before their next scheduled shift.
- D. Brecke Mechanical promotes preventative behavior such as:
 - 1) Rotating job tasks (when possible)
 - 2) Scheduling work around the cooler parts of the day (when possible).
 - 3) Providing adequate rest time between shifts.
- E. Every employee required to work in a high heat/cold area shall be trained on fatigue prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Ergonomic equipment to prevent fatigue.
 - 2) Unhealthy effects of over-the-counter meds and/or energy drinks to stay alert.
 - 3) Periodic rest breaks
 - 4) Reporting fatigue/tiredness. It is the responsibility of every employee to report any signs or symptoms of fatigue to their supervisor(s) immediately.

5.5 GOOD MANUFACTURING PRACTICES (GMP):

- A. Brecke Mechanical shall follow all GMP policies and procedures set forth by the customer.

- B. Hairnets and beard snoots shall be worn in all required areas, hair shall:
 - 1) Be tucked inside the hairnet and the hairnet shall cover the ears.
 - 2) Beard snoots shall be worn to cover all facial hair including hair above the upper lip that is more than 1 day's growth.
- C. Handwashing must be completed:
 - 1) Before and after:
 - a) Meals
 - b) Breaks
 - c) Smoking
 - d) Using the restroom
 - 2) Upon entering and exiting raw food areas
 - 3) Prior to entering Ready to Eat (RTE) areas.
- D. Clothing and tools must be clean and sanitary.
- E. Tools shall not be placed directly on the floor.
- F. Glass shall not be taken into any food areas.
- G. Food shall not be consumed, disposed of, or stored in any area of the facility except in designated areas only.
- H. Every employee required to work in a GMP position will be trained on GMP prior to starting on a job site as outlined in section 3.3.

SECTION 6: HAZARDOUS CHEMICALS, GAS, & MATERIALS

6.1 HAZARD COMMUNICATION

- A. The Safety Team shall ensure that employees at each work site understand:
 - 1) SDSs and where to find them.
 - 2) Labels and other warning signs.
 - 3) Training required.
 - 4) Communication process.
- B. All parts of the program shall be followed at all times.
- C. Due to working at multiple worksites, the written program shall be available to any employee as necessary or as requested. The program is available anytime in the TrainingVault and on the company drive.
- D. A complete list of chemicals along with the SDS(s) provided by the manufacturer shall be kept on [sdsbinderworks.com](https://www.sdsbinderworks.com):
 - 1) SDS Binderworks is available to all employees at no cost.
 - 2) SDS Binderworks information shall be provided to customers as requested.
 - 3) An updated Binder of SDSs shall be provided for any site where electronic access is not readily available.
 - 4) Chemicals are listed by name on the SDS/Label and common name.
 - 5) Any employee purchasing or receiving any chemical must obtain an SDS and provide it to the Safety Team.
- E. Every employee shall be trained on HazCom prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) OSHA HazCom Standard (1910.200)
 - 2) Chemicals that employees may be exposed to.
 - 3) Care and use of SDS, Labels, and other means of warning such as:
 - a) Product Identifier

- b) Signal Words
 - c) Pictograms
 - d) Hazard Statements
 - e) Precautionary Statements
 - f) Supplier Information
 - g) Hazard Classifications
 - h) 16 Sections of SDS
 - i) Other warning methods such as HMIS diamond.
- 4) Other employers/contractors & SDSs
 - 5) Elements of the HazCom Program
 - 6) Exposure Routes for Chemicals
 - 7) Hazards associated with chemicals:
 - a) Physical hazards
 - b) Reactively
 - c) Toxicity including reproductive effects.
 - d) Compressed Gases
- F. Site-specific training for non-routine tasks includes:
- 1) Chemical exposure
 - 2) Providing and receiving customer SDS
 - 3) Providing and receiving contractor/subcontractor SDSs
- G. All received SDSs shall be reviewed with all employees with potential exposure as part of the PJHA process.

6.2 GENERAL CHEMICAL SAFETY

- A. All chemicals shall be properly stored, and good Housekeeping maintained to minimize the potential for a spill.
- B. Flammable chemicals shall be stored in a flammable storage cabinet and/or an approved safety container as required.
- C. Eyewash stations, safety showers, and eyewash bottles shall be provided where necessary.
- D. Prior to operations that could make a contaminant airborne, precautions must be reviewed with the Safety Team to plan ways to control fumes, contaminants, and necessary oxygen.
- E. Employees required to handle chemicals will be trained in spill response, PPE, equipment, and SDS reference for proper cleanup as outlined in section 3.3; training shall include:
 - 1) Storage location
 - 2) Equipment use and limitations
 - 3) Inspections and maintenance
 - 4) Disposal of chemicals and where they may be disposed of for example either:
 - a) Linn County Solid Waste Agency: 1954 County Home Road, Marion, IA 52302
 - b) Dubuque Metro Solid Waste Agency: 14501 Highway 20 West, Dubuque, IA 52002
 - 5) The process prior to taking chemicals/hazardous materials to the disposal agencies:
 - a) Waste Oil must be collected in 55-gallon drums.
 - b) Other items must be stored in their own containers and stored away from any potentially reactive chemical or physical hazards.
 - c) Do Not pour chemicals onto the ground, down a drain, or in a storm drain system.
 - d) Do not dispose of hazardous chemicals in the trash including spray cans.
- F. Spill response materials must be adequate for any anticipated spill.
- G. Employees experiencing signs and/or symptoms of chemical exposure and/or spills shall report the incident immediately to the supervisor(s), Team Leader, and the Safety Team.

6.3 PROCESS SAFETY MANAGEMENT (PSM)

- A. The purpose of PSM is to prevent or minimize the catastrophic release of toxic, reactive, flammable, or explosive chemicals.
- B. PSM shall be followed on all customer sites where the process or operations involve the use, production, or presence of explosive chemicals.
- C. Brecke Mechanical shall provide policies, procedures, SDS, and/or any other necessary documentation as required by the customer.
- D. Basic information regarding the process, hazard analysis, and chemicals shall be discussed during the PJHA review will all employees including potential fire, explosion, or toxic release.
- E. Any material replaced shall meet customer specifications and have prior approval before installation.
- F. Special hazards:
 - 1) Brecke Mechanical shall inform customers of any hazard presented by or found during work.
 - 2) Hot Work requires permits and shall be obtained by the customer.
- G. Every employee required to work in a PSM area shall be trained on PSM by the customer prior to starting on a job site; training shall include:
 - 1) The process involving chemicals.
 - 2) Hazard Analysis
 - 3) Chemicals used.
 - 4) Potential exposure and mitigation
 - 5) Emergency procedures

6.4 COMPRESSED GAS & CYLINDERS

- A. Storage & Transportation:
 - 1) All compressed gas cylinders shall be clearly identified.
 - 2) DOT placards and any other identification markings shall be clearly visible.
 - 3) Flammable compressed gases must be stored at least 20ft from any oxidizer or separated by a 5ft – ½ hour rated firewall.
 - 4) Store in areas protected from heat including sparks and/or slag from hot work.
 - 5) Store in areas and with methods where cylinders are protected from impact or tampering.
 - 6) Store and transport in the upright position secured to prevent tipping (such as a basket or cart).
 - 7) Store in well-ventilated areas that are protected from potential weather damage.
 - 8) Cylinder storage area shall be clearly divided, and each section shall be defined as full or empty, which shall be followed.
 - 9) Valve Caps must be used at all times when not in use.
- B. If the valve/cylinder cap cannot be removed, tag as “Do Not Use” and take the cylinder to the servicing company.
- C. Use of compressed gas & cylinders:
 - 1) Visually inspect cylinders, regulators, hoses, and connections prior to use as outlined in section 3.4.
 - 2) Do not expose cylinders to external heat sources.
 - 3) Only tools provided by the supplier should be used to open/close valves.
 - 4) Special shutoff/disconnect wrenches must be in place for emergency shutoff if necessary.
 - 5) Valves must be closed after use even when empty.
 - 6) Employees shall be trained in the proper use, handling, and storage of compressed gas cylinders.

- 7) Leaking cylinders shall be isolated from other cylinders and sources of ignition. Tag the cylinder "Do Not Use" and contact the servicing company to immediately correct the issue.
- 8) Cylinders no longer needed shall be stored as empty and returned to the supplier.

6.5 LEAD

- A. Materials that we use and may have the potential of containing lead include:
 - 1) Solder
 - 2) Pipes
- B. Brecke Mechanical shall use lead-free solder on all public water systems or facilities providing potable water.
- C. 50/50 solder may be used on drainage systems only.
- D. Areas with potential lead exposure above maximum exposure levels shall have warning signs posted.
- E. All Lead specific PPE shall be provided by Brecke Mechanical at no cost to the employee including but not limited to:
 - 1) Coveralls
 - 2) Gloves
 - 3) Goggles
 - 4) Respirators
- F. Every employee required to work in an area with potential lead exposure shall be trained on lead prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Locations of lead
 - 2) Operations with potential lead exposure
 - 3) Respirator training
 - 4) Medical Surveillance
 - 5) Adverse Health Effects of Lead
 - 6) Do not disturb any lead unless necessary for work.
 - 7) Mitigation methods
 - 8) Compliance plans in effect (if applicable)
 - 9) Medical record access
 - 10) Chelating agents (Are used only under medical supervision when instructed).
- G. Employees shall wash any skin that lead materials come into contact with.
- H. Lunchroom/clear break area, hygiene, shower & changing facilities will be provided if exposure exceeds maximum exposure levels.
- I. If an employee is exposed or potentially exposed at or above the action level of an airborne concentration of 30 micrograms per cubic meter calculated as an 8-hr TWA.
 - 1) Maximum Exposure:
 - a) 50 micrograms per cubic meter is calculated as an 8-hr TWA.
 - b) 400 micrograms per cubic meter per day regardless of length of time.
 - 2) If lead abatement is in progress by another contractor, Brecke Mechanical employees shall be protected from exposure by enclosures.
 - 3) Air sampling shall be conducted in a manner that reflects the employee's regular daily exposure and/or maximum daily exposure.
 - a) Air monitoring shall be repeated every 6 months if above the action level.
 - b) Air monitoring shall be repeated until 2 consecutive measures are below action level (at least 7 days apart).
 - c) Employees shall be given a written copy of the results and any corrective actions (if applicable).

- 4) For employees who have potentially been exposed or have been exposed in amounts at or above the action level for a day, an initial medical consultation shall be provided including blood sampling.
- 5) Blood sampling intervals shall be dependent on results and exposure levels.
- 6) If blood sample levels are elevated:
 - a) Employees shall be immediately removed from operations where lead exposure is present.
 - b) Employees shall be notified in writing of the elevated levels of lead in their blood samples.
 - c) During the period of an employee being removed from a lead exposure location, they shall have blood sampling conducted monthly until acceptable levels are reached.
- 7) Each site having lead exposure shall be reported to the Safety Team for evaluation. A written site-specific program to reduce and/or eliminate exposure to below-action levels shall be created.
- 8) Employees exposed shall wear respirators during the evaluation and/or until the implementation of mitigation of exposure.

6.6 HEXAVALENT CHROMIUM

- A. Employees shall not be exposed to levels above the Permissible Exposure Limit (PEL) of $5\mu\text{g}/\text{m}^3$ Time Weighted Average (TWA).
- B. Brecke Mechanical uses a combination of historical data and air monitoring to determine employee exposure.
- C. Brecke Mechanical employees have been shown to be below $2.5\mu\text{g}/\text{m}^3$ as an 8-hour TWA.
- D. Respiratory protection shall be required if exposure exceeds $2.5\mu\text{g}/\text{m}^3$.
- E. Any employee exposed to the PEL or higher for 30 days per year or during an emergency shall be medically evaluated at no cost to the employee.
- F. Employees shall follow customer requirements regarding Hexavalent Chromium including:
 - 1) PPE (provided at no cost to employees)
 - 2) Engineering and work practice controls to reduce to the lowest possible level.
 - 3) Regulated areas:
 - a) Areas where exposure could be in excess of the permissible exposure limit.
 - b) Access is restricted to authorized personnel.
 - c) Marked with warnings.
- G. Keeping areas clean: Any accumulation of chromium shall be cleaned appropriately to minimize exposure.
- H. Facilities such as hygiene areas for changing and decontamination shall be provided.
- I. Every employee required to work in an area with potential Hexavalent Chromium prior exposure shall be trained on Hexavalent Chromium prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Chromium hazards
 - 2) Control Methods
 - 3) Medical Surveillance
 - 4) Customer-specific policies and procedures

6.7 HYDROGEN SULFIDE (H₂S)

- A. Employees shall have an approved monitoring system as required, whenever there is a potential exposure to H₂S.
- B. H₂S can be found in operations that include:
 - 1) Sewage
 - 2) Landfills
 - 3) Mining
 - 4) Gas
 - 5) Oil
- C. H₂S is a flammable gas that is:
 - 1) Toxic
 - 2) Colorless
 - 3) Smells like sulfur (like rotten eggs in low concentrations)
 - 4) Is soluble in water.
- D. Health effects of H₂S exposure can include, but not limited to:
 - 1) Sore eyes, nose, and throat
 - 2) Loss of smell and nausea
 - 3) Irritated respiratory system.
 - 4) Effects oxygen utilization
 - 5) Central nervous system issues
- E. Employees must be aware of the customer's emergency plan(s).
- F. When the alarm sounds all employees must evacuate the area immediately.
- G. Any employee that must enter an area with H₂S above alarm levels must treat the area as an IDLH atmosphere.

6.8 ASBESTOS

- A. Brecke Mechanical does not remove or handle asbestos. Asbestos removal will be referred to those trained and equipped for safe handling, removal, and clear documentation. Brecke Mechanical shall strictly adhere to the guidelines set forth by the agencies with asbestos authority.
- B. If work is being completed in an area the customer is responsible for, the customer will provide the testing and/or removal. If work is being completed in an area outside of the customer's responsibility Brecke Mechanical shall contract an outside company for testing and/or removal.
- C. The most common form of potential asbestos exposure for Brecke Mechanical employees is from pipe insulation.
- D. Brecke Mechanical employees shall not cause materials containing asbestos or suspected of containing asbestos to become airborne hazards.
- E. Employees shall contact their supervisor(s), Team Leader, Safety Team, and customer contact immediately if any insulation that is to be removed potentially contains asbestos.
- F. Upon discovering material containing asbestos, employees shall verify the material has been tested and request a copy of the report from their supervisor(s), Team Leader, Safety Team, or customer contact.
- G. Record of any asbestos exposure shall be documented and maintained with medical records for the exposed employee.
- H. Every employee required to work in an area with potential asbestos exposure shall be trained on Asbestos prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Recognizing Asbestos.
 - 2) Working around Asbestos abatement
 - 3) Brecke Mechanical Asbestos policy.
 - 4) Governing agencies with authority.

- I. During asbestos abatement, Brecke Mechanical employees shall not be inside the contaminated area.
- J. In the event of a breach of contaminant, Brecke Mechanical employees shall evacuate the area and immediately contact the customer, supervisor(s), Team Lead, and the Safety Team.
- K. Possible health effects from asbestos exposure:
 - 1) Asbestosis – Serious, progressive, long-term non-cancer disease of the lungs. Asbestos fibers irritate the lungs, creating scar tissue resulting in difficulty getting oxygen to the blood.
 - 2) Cancer of the – Lungs, stomach, colon
 - 3) Mesothelioma – Cancer found in the thin lining (mesothelium) of the lungs, stomach, heart, or testicles.
 - 4) Many of the health issues associated with asbestos may not show up until many years after exposure.

6.9 SILICA DUST

- A. Silica Dust, also referred to as respirable crystalline silica, is governed by OSHA standard 1926.1153 including Table 1 of this standard (herein referred to as Table 1).
- B. A written copy of this manual, policy, and Table 1 shall be provided to employees as needed or upon request.
- C. The Safety Team shall assess the program's effectiveness as needed but no less than annually.
- D. The Safety Team shall be responsible for making frequent job-site inspections of the operations, materials, and equipment to ensure proper use.
- E. Operations that may expose employees to silica dust over the action level shall assess the situation with the Safety Team to determine necessary protection as described in Table 1.
- F. Exposure to silica dust can be created by cutting, grinding, drilling, or removing concrete, asphalt, or other silica-containing products.
- G. Cleaning of a silica operation shall be done with wet sweeping or a HEPA-filtered vacuum.
- H. For all operations that could produce silica dust, employees shall follow Table 1 including wearing respirators to lower the level of exposure to that below the action level.
- I. Any area of operations that could produce silica dust including those listed in Table 1 shall be barricaded off by:
 - 1) The use of marked yellow Caution or red Danger tape if indoors.
 - 2) Cones or other barricade equipment marked with the hazard shall be used if outdoors.
- J. If another employer is/has completed operations resulting in silica dust in the air, Brecke Mechanical employees are not permitted to enter and/or must evacuate the area immediately until the dust has been mitigated.
- K. Employees exposed to levels at the action level for at least 30 days per year shall undergo medical surveillance as described in OSHA standard 1926.1153.
- L. Every employee will be trained on Silica Dust prior to starting on a job site with potential exposure as outlined in section 3.3.
- M. Possible health effects from Silica Dust exposure:
 - 1) Silicosis
 - 2) Lung Cancer
 - 3) Other respiratory diseases such as – Chronic bronchitis or COPD.
 - 4) Kidney disease

6.10 OTHER SPECIALIZED HAZARDS

- A. Other hazardous chemicals, gas, and materials shall go through the Safety Team Leader for training, hazard mitigation, and control.
- B. Special circumstances resulting in temporary or adjusted policies and procedures such as Pandemic Plans or site-specific plans shall be controlled by the Safety Team Leader.

SECTION 7: WORKING SURFACES & SPACES

7.1 WORKING SURFACES

- A. Brecke Mechanical job sites have many different working surfaces such as unstable soil, solid flooring, unstable flooring, narrow halls, roofs, etc.
- B. Surface Opening Protection:
 - 1) Floor and wall openings shall be guarded and/or covered.
 - 2) Covers shall be secured and labeled clearly with "Hole" on the cover.
 - 3) Permanent floor or wall openings must have toe-boards and guard rails.
 - 4) Fall protection is required to be worn when working in areas that are unguarded or have uncovered openings as outlined in section 4.7.
- C. All areas must be kept clean and free from hazardous debris in the most environmentally safe manner:
 - 1) All employees will be made aware of proper waste disposal and segregation for the specific job site where they will perform work.
 - 2) Clean as you work immediately clean spills and throw away trash and debris in the assigned/designated trash receptacle.
 - 3) To minimize the negative impact on the environment, if recycling containers are available handle, separate, and store any waste and scrap metal in the designated recycle receptacles.
- D. Protruding steel from the concrete must be guarded to eliminate impalement.
- E. Do not place a load onto any portion of flooring or a structure including shelving, or concrete that exceeds the load limit.

7.2 ROADWAYS / IN PLANT RAIL SAFETY

- A. Employees shall follow all facility safety procedures and site-specific plans.
- B. When working on or near a roadway or a plant railway employees shall wear proper PPE at all times including but not limited to:
 - 1) Hi-Vis clothing or vests as outlined in section 4.6.
 - 2) Hard hats as outlined in section 4.2
- C. Roadway Specific:
 - 1) Work areas shall be marked off with safety cones/barricades prior to beginning work.
 - 2) Always stop, look, and listen before crossing traffic. Cross at appropriate crosswalks where available.
- D. Plant Railway Specific:
 - 1) Always stop, look, and listen before crossing a railway.
 - 2) Be cautious, rail cars/equipment may move in either direction.
 - 3) Cross railways at appropriate rail crossings when available and do not step on tracks.
 - 4) Do not cross rail crossings within 10 feet of an oncoming rail car and do not climb under or over rail cars.
 - 5) Prior to starting work within 6ft of rail tracks contact your supervisor(s) and site contact to take the tracks out of service.

7.3 TRENCHING & EXCAVATION

- A. Each excavation site shall have a competent person on site.
- B. Competent Person shall not be allowed to enter the trench/excavation site until replaced by another competent person.
 - 1) Competent person shall be responsible for:
 - a) Completing the daily inspection sheet for Trenches and Excavation.
 - b) Conducting periodic inspections throughout the day, after rainfall, or any other increasing hazard.
 - c) Create and enforce an excavation safety plan.
 - d) Ensure accurate Locates have been completed and verified.
 - e) Conduct soil testing daily and as necessary.
 - f) Ensure the Trench Box and any other necessary protection systems are on-site.
 - g) Complete a PJHA form and review the results with all affected employees.
 - h) Initiate "Stop Work" if a hazardous situation is evident.
- C. Soil Classification:
 - 1) There are four types of soil classifications as defined by OSHA 1926 Subpart P.
 - 2) If not assuming Type C soil, both visual and manual tests (at least 1 each) are required to determine soil type.
- D. Trenching/Excavation guidelines:
 - 1) Any trench or excavation greater than 4ft deep shall follow all rules of this policy and OSHA regulation 1926 Subpart P.
 - 2) Unless protected by equipment, all employees working in or around an excavation site shall be required to wear hi-vis clothing and/or vests as outlined in section 4.6.
 - 3) Barricades and/or cones must be set up prior to working in or on a roadway.
 - 4) Prior to any excavation and/or underground services, the utilities shall be located using a "Locate" service at least 24- hours prior to starting work (unless a longer time is required).
 - 5) Work sites shall be cleared of any hazards by removing anything that can be removed or for non-removable hazards placing a protective barrier by covering them.
 - 6) Any crossings or walkways must have guardrails to protect from falls.
 - a) Top rail height shall be 42 inches \pm 3 inches.
 - b) If conditions warrant an additional rail above 45 inches the lower rails must remain at the height requirements listed above in (a).
 - 7) Any trench or excavation at least 5ft deep shall have cave-in protection such as:
 - a) Benching
 - i. Must be Type A or Type B soil.
 - ii. Shall be completed at a 1:1 ratio.
 - iii. Each Bench shall not exceed 4ft.
 - b) Sloping
 - i. Type C soil shall be completed at a minimum ratio of 1.5:1 Horizontal to Vertical.
 - ii. Shall not exceed an angle of 34°.
 - iii. Type A or Type B soil shall be completed at a minimum ratio of 1 Horizontal to 1 Vertical and shall not exceed an angle of 45°.
 - c) Shoring
 - d) Trench Box(es)
 - i. That is capable of safely withstanding all loads applied or transmitted shall be used to protect employees from cave-ins.

- ii. Must be used in accordance with the manufacturer's recommendations and guidelines.
 - e) Engineered Method must be used if the depth is at least 20ft.
- 8) All employees in a trench must be within 25ft, horizontally from a ladder, stairway, ramp, or other safe means of egress.
- 9) No employee may work under any elevated load or equipment including digging equipment.
- 10) If digging equipment is raised or there is an elevated load:
 - a) Hard hats must be worn by all individuals not protected by the equipment.
 - b) The operator must remain in the operator's seat.
- 11) Spoil piles must be at least 2ft from the edge of the excavation and/or trench.
- 12) Employees shall NOT be allowed in a trench while equipment is:
 - a) Digging
 - b) Soil moving
 - c) Under the path of a load or in a position where an individual could be struck while materials are being lowered into the trench.
- 13) Air monitors (H2S, CO, LEL, and O2) shall be used prior to entry and used periodically during operations where:
 - a) Hazardous substances are stored or used nearby.
 - b) Areas near gas lines or sewer lines where a leak is confirmed or expected.
 - c) A hazard is being introduced that could cause atmospheric hazards.
 - d) Prior monitoring shows any levels of atmospheric hazards.
 - e) Where ventilation or heaters are used.
- 14) Underground utilities that may be exposed during excavation shall be protected, supported, or removed as the situation dictates.
- 15) In the event of water accumulation:
 - a) Each situation shall be evaluated by a competent person.
 - b) Employees shall NOT enter an area with water accumulation until the hazards have been determined and protected against.
 - c) Possible methods of hazard mitigation:
 - i. Support or shield system
 - ii. Water removal (Operations shall be evaluated by a competent person).
 - iii. Harness and retractable devices as used in confined spaces.
- 16) Only trained, qualified rescuers shall attempt rescue operations. In the event of an emergency call 911 immediately.

7.4 CONFINED SPACE

A. CONFINED SPACE ROLES:

- 1) **Supervisor, Planner, Permit Writer:**
 - a) Coordinate and verify that all necessary equipment is on-site prior to the start of the job (cones, road barricades, air monitors, etc.).
 - b) Ensure permits and plans are correct and up to date.
 - c) Complete and review the Permit/Plan with all employees.
 - d) Ensure air monitoring is being completed.
 - e) Complete and submit the daily Confined Space Entry Permit/Plan to the Safety Team electronically or physically upon completion of the job.
 - f) Suspend, cancel, and/or terminate the permit as necessary.
 - g) When transferring responsibilities, verify entry conditions are still within the conditions maintained by the permit.

2) **Attendant:**

- a) No attendant shall be permitted to monitor more than one confined space at a time or leave the confined space opening without being replaced by another attendant.
- b) The attendant is prohibited from performing any duties that may interfere with their duties as an attendant or breaking the plane of the confined space for any reason such as:
 - i. To hand tools and materials off
 - ii. Attempt rescue
- c) The Attendant shall:
 - i. Understand and familiarize themselves with hazards, equipment, work, and behavioral changes of the Entrant including signs and symptoms of exposure to hazards.
 - ii. Protect the space and keep unauthorized personnel from entry or alteration of the space or conditions.
 - iii. Assess the Entrant, procedures, and space for hazards and/or exposures.
 - iv. Maintain continuous communication with Entrant.
 - v. Communicate evacuation with the Entrant if/when necessary.
 - vi. Maintain communication with Supervisor(s) and Rescue Personnel as necessary.
 - vii. If Rescue Personnel are not on-site, communicate with them to perform a non-entry rescue if possible.

3) **Entrant:**

- a) The Entrant shall understand and familiarize themselves with hazards and proper use of equipment.
- b) Communicate with the attendant as necessary for attendant assessment.
- c) Immediately alert the attendant of any changes in conditions.
- d) Regularly monitor air quality and report the results back to the attendant.
- e) Immediately exit the workspace if/when:
 - i. Instructed to do so by the Attendant.
 - ii. A dangerous or "Stop Work" condition arises.
 - iii. Evacuation alarm sounds
- f) Safely complete work.

4) **Non-Brecke Mechanical Rescue Personnel:**

- a) Maintain and adhere to all rescue training.
- b) Maintain ability to rescue entrant.
- c) Remain on-site during entry operations.
- d) Maintain communication with the attendant.
- e) Employees and other personnel are prohibited from performing any duties that may interfere with rescue duties or entry operations.

B. CONFINED SPACE PLANNING & PERMIT

- 1) Prior to entering a confined space, a plan shall be established.
- 2) Planning guidelines:
 - a) The Confined Space Entry Permit/Plan is available electronically on the company drive.
 - b) Upon accepting a job, a plan shall be developed between the Foreman, Superintendent, Safety Team, and the customer via a site visit.
 - c) The plan shall address barriers and/or barricades that are needed to prevent unauthorized entry.

- d) The plan shall be completely filled out and reviewed by all individuals involved prior to work beginning.
- 3) Plan Execution:
- a) Once the Plan has been established the supervisor(s) shall communicate with the Team Leader or the Safety Team to ensure all equipment is or can be made available for the operation.
 - b) Any special provisions or procedures such as road barricades have been arranged and/or ordered for the day of work.
 - c) Arrange for entry rescue with the customer (if necessary)
 - d) The Plan shall be used as the baseline to begin Permit writing.
- 4) Permit Writing Guidelines:
- a) After reviewing the Confined Space Plan, the Supervisor and/or Permit Writer shall complete the entry permit with the assistance of the Entrant and Attendant where needed.
 - b) After reviewing “Stop Work” thresholds, the Supervisor/Permit Writer shall issue the permit to the Entrant and Attendant.
 - c) Issued permits must be posted outside the confined space by the Attendant.
 - d) Any adjustments not including recording of air monitoring readings shall require the removal of the Entrant and re-approval of the permit from the Permit Writer.
- 5) The permit may be altered, suspended, canceled, and/or terminated by the Permit Writer if:
- a) Operations change outside of the scope of work.
 - b) “Stop Work” thresholds have been reached.
 - c) Work must cease temporarily for any reason (the suspension cannot exceed the length of the shift).
 - d) Time for a permit has elapsed or work has been completed.
 - e) Any other safety concerns as recognized by the supervisor and/or Permit Writer.
- 6) Confined space equipment:
- a) Tripods, retrieval lifelines, air monitors, and any other necessary equipment shall be provided by Brecke Mechanical.
 - b) Air monitors shall be inspected and calibrated within the manufacturer’s recommendations monthly but not to exceed 3 months without calibration.
 - c) Brecke Mechanical air monitors are 4 gas monitors (CO, H₂S, LEL, O₂).
 - d) Fresh air system CO monitors and/or alarms are calibrated monthly or prior to each use, whichever is longer.
 - e) Calibration processes or data forms may be viewed by any Entrant or representatives.
 - f) Confined space operations may use the fresh air system for supplied air if no prior atmospheric hazards are present.
- 7) Operations:
- a) Take necessary readings.
 - b) Employees shall follow the training process as outlined in section 3.3.
 - c) At least one Attendant must be present at all times when the Entrant is in the confined space.
 - d) Air monitoring (continuous with periodic recording) shall be required during operations if there is a potential change in the space, continuous ventilation is applied, or any atmospheric hazard has been observed during testing.
 - e) Employees involved in entry operations, or their representatives, may request additional monitoring at any time.
 - f) In the event multiple employers are working in a confined space:

- i. A single supervisor must be determined to oversee all operations.
- ii. Each employer may provide their own Entrant or may use the same Entrant as long as communication can be maintained with all Entrants, Attendants, and rescue personnel.
- iii. There is an acceptable means of no-entry rescue that cannot be disabled by having multiple Entrants by methods such as tangling.
- iv. All employees involved in entry operations shall review permits and hazards including "Stop Work" and those caused by other Entrant's operations.

C. CONFINED SPACE GUIDELINES:

- 1) Confined space is defined as, and must show the space to:
 - a) Be large enough to enter and perform work.
 - b) Not designed for continuous occupancy.
 - c) Limited/restricted means of entry and/or exit.
- 2) Permit required confined space is defined as, and must show the space to:
 - a) Contain or could contain a hazardous atmosphere.
 - b) Has the possibility of entrapment, asphyxiation, or engulfment.
 - c) Assess and monitor for other hazards native to the space or introduced by the entrant.
- 3) Prior to entering a confined space, an established plan including "Stop Work" limits shall be reviewed with all employees.
 - a) All employees working in a confined space shall be required to wear hi-vis clothing and/or vests as outlined in section 4.6.
 - b) Barricades and/or cones must be set up prior to working in a confined space.
 - c) Air monitors (H₂S, CO, LEL, and O₂) shall be used prior to entry and used periodically during operations where:
 - i. A hazard is being introduced or changed that could cause atmospheric hazards.
 - ii. Prior monitoring shows any levels of atmospheric hazards.
 - iii. Where ventilation or heaters are used.
 - d) Brecke Mechanical does not have any employees trained in confined space rescue and shall use non-entry rescue wherever it does not increase the risk to the entrant.
 - e) Every employee required to work in a confined space will receive Confined Space training prior to starting on a job site as outlined in section 3.3; training shall include:
 - i. All confined space and safety practices
 - ii. Specific confined space roles prior to being assigned the role such as entrant, attendant, supervisor, etc.
 - iii. Customer required site-specific confined space plans.
 - f) Rescue services shall be provided by:
 - i. The customer and/or host employer
 - ii. An outside service is given an opportunity to examine the entry site, practice rescue, and decline as appropriate.
 - iii. Rescue services must be on-site in the event of IDLH conditions.
 - g) The Confined Space program shall be reviewed annually by the Safety Team using canceled permits.

7.5 WELDING/HOT WORK

- A. Hot work refers to any process that is flame, fire, and/or spark-producing: i.e., welding, cutting, grinding, brazing.
- B. Prior to starting hot work, remove all possible flammable material from the area including sweeping potential dust.
- C. Flammables that cannot be removed shall be guarded or covered by a flame-resistant barrier to protect the flammable object/material.
- D. Hot work should be completed in a designated hot work area with appropriate ventilation and free from flammable hazards if possible.
- E. Work that must be completed outside of a designated hot work area must have a hot work permit and have a constant fire watch. In the event the customer does not have a Hot Work permit the Brecke Mechanical permit shall be used.
- F. If hot work cannot be completed safely, it shall not be performed.
- G. Equipment that is defective or damaged shall not be used until a qualified person has repaired it.
- H. Employees shall be trained in the safe operation and use of equipment such as welding/cutting and other hot work functions prior to being assigned to hot work tasks or areas as outlined in section 3.3.
- I. Fire Watch:
 - 1) ABC-rated fire extinguishers with a minimum size of 5 lbs. shall be readily available.
 - 2) Fire watch shall remain during entire operations and at least 30 minutes after the completion of operations unless a longer period is required by the customer.
 - 3) Every employee required to work in an area with the potential for fire hazards shall be trained in Fire Watch prior to starting on a job site as outlined in section 3.3; training shall include:
 - a) Fire prevention and protection
 - b) Fire extinguisher operations
 - c) Constant supervision and other requirements/limitations of fire watch.
- J. Specific Hazards:
 - 1) Hot work operations need to have adequate ventilation or respiratory protection for all individuals in the area.
 - 2) Respiratory protection needs to be appropriate for hazards based on NIOSH evaluations of PPE and OSHA's action level.
 - 3) Local Exhaust Ventilation can be used to remove welding fumes in open areas.
 - 4) Confined Space hot work should use supplied air respirators or fresh air systems when applicable to ensure safe operations.
 - 5) Where there is a potential for hazardous fumes, gases, or dust these hazards shall be mitigated via ventilation, respiratory protection, or other means as deemed by the customer and Safety Team.
 - 6) Electrodes shall be removed, or torches closed, and gasses shut off:
 - a) During lunch
 - b) End of shift
 - c) Any prolonged break-in operation.
- K. After completion, hot metal shall be marked or otherwise notated/signed to warn other workers.

7.6 HOT/COLD WEATHER

- A. Employees required to work in hot/cold areas shall be trained in the effects of Hot/Cold Weather at the initial assignment and annually thereafter as outlined in section 3.3.
- B. Supervisor training including prevention, recognition, and emergency response to heat and cold-related illnesses shall be completed prior to allowing supervision of employees.

- C. Any employee may be assigned a task to be performed outside or in an area that would potentially put the employee at risk of heat/cold illness.
- D. Prior to assigning a task where a heat/cold illness is a potential, personal risk factors shall be taken into consideration.
- E. Personal risk factors include, but are not limited to:
 - 1) Employee health and fitness
 - 2) History of heat/cold illness
 - 3) Recent illness
 - 4) Physician recommendations
 - 5) Accommodations and availability of accommodations
- F. **Heat:**
 - 1) The risk of having a heat-related illness is greatest for new employees during the first 2 weeks of working in a high-heat environment.
 - 2) Supervisor(s) are to routinely check on new employees to ensure they are consuming enough water, and not showing signs and symptoms of heat illness.
 - 3) During high-heat days, if possible, work will be adjusted to have the majority of work completed during non-peak hours.
 - 4) In the event potable water is not available, Brecke Mechanical shall determine the method of correction on a case-by-case basis.
 - 5) Employees working in a high-heat area should drink at least 1 cup of water every 15 minutes.
 - 6) Employees are discouraged from consuming dehydrating drinks such as coffee, tea, soda, or energy drinks while working in the heat.
 - 7) If possible, employees may have access to shade or air conditioning during break times.
 - 8) Any employee feeling signs or symptoms of heat illness shall report to their Supervisor(s) and the Safety Team immediately.
 - 9) Resources are available through OSHA's website or the OSHA Heat Safety Tool mobile app.
 - 10) Call 911 if it is an emergency.
- G. **Cold:**
 - 1) All employees shall be familiar with the signs and symptoms of cold weather-induced health problems such as trench foot, hypothermia, and frostbite.
 - 2) Walkways and parking lots shall be kept as clean as possible from snow and ice and salted/sanded as soon as possible.
 - 3) Cold weather supplies shall be regularly inspected and restocked.
 - 4) Employees shoveling snow must be aware to not overexert themselves.
 - 5) Be aware of your surroundings and walk carefully in areas where there is the potential for the presence of snow and ice.
 - 6) Employees must wear proper cold weather protection when working in cold, wet, windy conditions.
 - 7) Employees working outside in the elements need to drink plenty of liquids to stay hydrated even in cold temperatures (avoid caffeinated beverages).
 - 8) If possible, avoid using vibrating tools or use a protective barrier such as gloves when using vibrating tools.
 - 9) Take measures to protect exposed skin from sun and windburn.
 - 10) Site supervisors or the Safety Team will notify employees of any hazards resulting from snow and ice accumulation.

SECTION 8: TOOLS/LADDERS/STAIRS

8.1 HAND & POWER TOOLS

- A. General guidelines and expectations include, but are not limited to:
- 1) Employees required to operate hand & power tools must be trained to operate any tool prior to initial operation as outlined in section 3.3.
 - 2) Inspect all tools prior to use as outlined in section 3.4.
 - 3) Use all tools as intended by the manufacturer and follow all operating instructions, safety standards, and guides provided. Use the correct tool for the job.
 - 4) Tools shall be cleaned and kept in good safe working condition.
 - 5) Employees shall perform required maintenance on all tools used as outlined by the manufacturer. Refer to your supervisor(s) or the manufacturer's guide regarding any questions about tool maintenance and care.
 - 6) Employees who are found to be using tools outside of the manufacturer's intended use or guidelines are careless, negligent, destructive, improper, or display unsafe use or operation of tools may be subject to disciplinary action, up to and including termination of employment.
 - 7) Secure items with clamps or vise to:
 - a) Keep items from moving.
 - b) Free both hands for safe operation
 - 8) Tools that can be anchored shall be appropriately anchored to prevent:
 - a) Unintentional movement
 - b) Tipping or falling
 - c) Excessive vibration
 - 9) Employees shall not use powder-actuated tools.
 - 10) When using tools, ensure long hair is securely tied back, avoid wearing jewelry or clothing that could pose hazards, and remain vigilant at all times of your surroundings.
 - 11) Always cut away from the body and never towards another individual.
 - 12) Never clear a jam with an unprotected body part, once the jam is clear it may cause a hazard resulting in a serious injury such as decapitation.
 - 13) Handles must be straight and tight.
 - 14) Impact Driven tools must be maintained to prevent/remove mushrooming.
 - 15) Set up screens when there is a chance for flying debris.
 - 16) PPE shall be worn as required by the manufacturer or as the hazard dictates.
- B. **Machine guarding:**
- 1) Guards shall be in place to protect against any employee coming into contact with the point of operation.
 - 2) Check all machine guards before and after use to ensure:
 - a) Proper setting
 - b) Good condition
 - c) Properly secured.
 - d) No missing guards
 - e) Mounted/positioned so as to not present a hazard.
 - 3) Do not disable machine guards unless instructed by the manufacturer for maintenance and only then follow the manufacturer's guidelines for maintenance including protection from accidental startup.
 - 4) Examples of some items that require guards:
 - a) Circular saws (above and below the base shoe)
 - b) Pulleys, fans, & belts 7 ft or less above the working surface.
 - c) All moving chains

d) Grinders (Multiple guards on bench grinders)

C. Power Tools:

- 1) Must be capable of being locked out.
- 2) Electrical tools must have a grounding plug, be double insulated, or have a low-voltage isolation transformer.
- 3) Extension cords must be at least the same configuration and size (can be larger) as the cord of the tool that is being used.
- 4) All tools and equipment shall be plugged in through a GFCI (Ground Fault Circuit Interrupter) outlet or pigtail.
- 5) All switches must work and shall not be tampered with.
- 6) Hydraulic tools shall be non-conductive when working around electrical equipment/lines.
- 7) Never carry or lift a tool by the cord and/or hose.
- 8) Disconnect all tools prior to completing any maintenance or changing blades.
- 9) Do not place a finger on the switch or trigger until you are ready to operate the tools.
- 10) Electric tools shall be kept dry and not used in damp or wet locations.
- 11) Always check pneumatic tools to ensure they are properly connected.
- 12) Do not point a tool at anyone including yourself.
- 13) Air compressors shall be periodically drained of any moisture and/or oil.
- 14) Fire-resistant fluid shall be used in hydraulic tools.

D. Grinders/Abrasive wheels:

- 1) Do not stand in front of the abrasive wheel as it accelerates in case the wheel explodes.
- 2) Guards:
 - a) Work rests within 1/8 inch of the wheel.
 - b) Rest on the top side of the grinder within ¼ inch of the wheel.
 - c) Side guard covers at least 75% of the wheel as well as the spindle, nut, and flange.
- 3) Max RPM of the wheel should be at least that of the motor.

8.2 LADDERS & STAIRS

A. Ladders or Stairs shall be used for a change in height of more than 18 inches, and at least one access/egress point shall be maintained at all times.

B. Ladder guidelines:

- 1) For the purpose of this manual, “rungs” shall be used for cleats and steps.
- 2) Wood job-made ladders shall NOT be permitted unless prior documented approval has been given. Only fiberglass ladders shall be permitted.
- 3) Always face the ladder when ascending or descending.
- 4) Do not carry items when ascending or descending ladders (employees shall use other methods such as rope, backpacks, etc. to raise tools, material, and equipment to the proper height).
- 5) Only use ladders on a stable, clean, level surface free from debris, and slip hazards, or in an area that does not have the potential for the ladder to be hit or moved. If these conditions are not possible the ladder shall be secured to prevent the ladder from moving.
- 6) Do not use a ladder by a door unless it is secured open, locked, or guarded/barricaded.
- 7) Area around the top and bottom of the ladder shall be free from debris or any other safety hazard.
- 8) Do not move a ladder during use.
- 9) Must meet or exceed OSHA/ANSI specifications (including having rungs spaced 10-14 inches apart).

- 10) Ladders that are designed to be leaned, such as single/extension ladders shall use the 4-to-1 rule.
 - 11) Employees shall not use the top two steps of a stepladder.
 - 12) Ladders shall extend at least three feet above the upper landing of a surface when used for access and secured if required.
 - 13) Ladders may be extended in a fashion designed by the manufacturer. Ladders shall not be extended by tying or fastening ladders together with rope or any other device not recommended by the manufacturer. Do not exceed load limits.
 - 14) Do not separate or dismantle a ladder in a way not intended by the manufacturer.
 - 15) Employees shall always maintain 3 points of contact while on a ladder.
 - 16) Any ladders failing inspection due to damage or defect shall be tagged "DO NOT USE" and removed from service immediately.
- C. Every employee required to utilize a ladder will be trained on ladders prior to starting on a job site as outlined in section 3.3; training shall include:
- 1) Selection and inspection of ladders
 - 2) Proper use
 - 3) Ladder load rating
 - 4) Hazard recognition
 - 5) Ladder Inspection Form
- D. Employees shall follow the inspection process as outlined in section 3.4.
- E. **Stair guidelines:**
- 1) Stairways with at least 4 steps or 30 inches shall have stair rails and handrails along any unprotected edge.
 - 2) Handrails and top of stair rails shall be able to support at least 200 pounds in any direction.
 - 3) Stair rails shall have a mid-rail, screen, mesh, or vertical beam less than 19 inches apart.
 - 4) No stair rails, handrails, or mid-rails shall be used as an anchor point for fall protection.
 - 5) Damaged stairways shall be reported immediately to the site supervisor(s) and secured by taping the stairway off with a sign "DANGER DAMAGED STAIRWAY"
 - 6) Stairways under construction shall not be used unless:
 - a) Sufficient lighting is available.
 - b) Handrails, landings, and treads are installed.
 - c) All parts are free from hazards such as slippery, obstructive, projections such as nails, screws, or any other hazardous debris.

SECTION 9: EQUIPMENT & VEHICLES

9.1 EQUIPMENT/VEHICLES/DOT REGULATIONS

- A. General guidelines and expectations for equipment and vehicle use include, but are not limited to:
- 1) Use all equipment and vehicles as intended by the manufacturer and follow all operating instructions, safety standards, and guides provided.
 - a) Employees shall not ride in or on equipment or vehicles unless the riding location is designed for that purpose by the manufacturer.
 - b) Equipment/vehicles must be of the correct size and shall only be used for tasks in a manner for which they are designated and intended by the manufacturer.
 - c) All loads shall be secured and within the manufacturers and legal limits.
 - 2) Employees who are found to be using equipment or vehicles outside of the manufacturer's intended use or guidelines, are careless, negligent, destructive, improper, or display unsafe use or operation of equipment, and/or vehicles, as well as excessive or avoidable traffic and

parking violations, may be subject to disciplinary action, up to and including termination of employment.

- 3) Employees must keep equipment and vehicles in good safe working condition by:
 - a) Performing minor maintenance on all equipment and vehicles used including but not limited to:
 - i. Topping off fluid levels.
 - ii. Maintaining proper air pressure in tires (if applicable)
 - b) Employees must immediately coordinate any maintenance requirements beyond their scope with their supervisor or the Shop Coordinator including but not limited to:
 - i. Regular scheduled maintenance, including but not limited to:
 1. Oil Change - every 5,000 miles
 2. Tire Rotation - every 10,000 miles
 3. Regular equipment maintenance
 - ii. Worn-out, damaged, or broken parts
 - iii. Malfunctioning parts.
 - iv. Expired tags and/or insurance cards.
- 4) The driver and passenger must always wear a seatbelt.
- 5) Employees shall report all accidents, incidents, near misses, and traffic violations to their Supervisor(s) and the Safety Team immediately.
- 6) Prior to leaving the vehicle and/or equipment, ensure:
 - a) The breaks are set (manual transmission)
 - b) The vehicle and/or equipment is in park (Automatic transmission)
- 7) Unattended equipment/vehicles must be locked unless prohibited by the customer.
- 8) When fueling:
 - a) The engine must be shut off.
 - b) The filler nozzle must be in contact with the tank.
 - c) No open flame or smoking in the immediate area.
- 9) Drivers/operators shall follow safe driving practices including but not limited to:
 - a) Obeying all Brecke Mechanical, customer/job site, federal, and state traffic, regulations, laws, and guidelines such as wearing your seatbelt, speed limit, red light cameras, and equipment zones.
 - b) Not driving/operating while under the influence of a controlled substance, alcohol, or medication that prohibits driving and/or operating equipment and/or vehicles.
 - c) Only authorized employees are permitted to operate Brecke Mechanical equipment/vehicles.
 - d) Practice defensive driving at all times.
 - e) Use hands-free options for cell phones or pull over to use a cell phone when possible. Do not check electronic communication such as email, text, etc. while in motion.
 - f) Be aware of your surroundings, when operating equipment/vehicle listen for backup alarms, make eye contact before crossing traffic and/or blind spots, and do not assume another individual sees you.
 - g) Smoking is prohibited in equipment and vehicles.
 - h) Direct equipment/vehicles from the driver's side.

B. Equipment:

- 1) Operators must possess a current valid license/certification for the equipment they are to operate.
- 2) While operating equipment stop and honk your horn around blind spots and at crossings.

C. Vehicle & DOT Regulations:

- 1) All Brecke Mechanical vehicles shall be equipped with:
 - a) Accident kit
 - b) First Aid kit
 - c) Fire Extinguisher
- 2) All equipment in the vehicle must be secured to either the floor or behind the seat to prevent a hazard in the event of an accident.
- 3) Brecke Mechanical will conduct an MVR on every employee:
 - a) Upon hire and every 3 years thereafter
 - b) Re-ran sooner if required.
- 4) DOT Regulations:
 - a) **All drivers** (DOT and Non-DOT) shall:
 - i. Know and do not exceed the capacity of the vehicle they are driving.
 - ii. Know and do not exceed the capacity of anything they are towing.
 - iii. Know if the gross combined weight rating (GCWR) exceeds 26,000 lbs.
 - iv. Follow all DOT/FMCSA Regulations.
 - b) **DOT ONLY Drivers:**
 - i. Drivers operating vehicles with a GVWR over 10,000 lbs., and drivers operating vehicles and trailers with a GCWR of 10,000 lbs. shall:
 1. Have a DOT number on the vehicle.
 2. Shall complete a daily pre- and post-trip vehicle inspection.
 3. If the vehicle alone or the vehicle with a trailer has a GCWR that exceeds 26,000 lbs. drivers must have a CDL license.
 - ii. Turn in daily inspection sheets weekly to the Team Leader. Any issues shall be reported immediately.
 - iii. Turn in completed logbooks quarterly to the Safety Team (if applicable).
- 5) Employees driving eligibility status will be determined by the following:
 - a) Ability to obtain and maintain a valid driver's license for the size and weight of the vehicle being operated.
 - b) Ability to pass an MVR
 - c) Has been approved to drive a Brecke Mechanical vehicle.
 - d) Employees who drive a company vehicle must immediately report to their supervisor(s), the Safety Team, and Human Resources the following license:
 - i. Restrictions
 - ii. Revocations
 - iii. Suspensions
 - iv. Any issued tickets that impact your license (including those related to the use of alcohol and/or a controlled substance in a personal vehicle).
 - e) Failure to immediately report any moving violations or loss of license may be subject to disciplinary action, up to and including termination of employment.
 - f) Employees are responsible for the full cost of any fines or citations received for violations including but not limited to:
 - i. Speed Cameras
 - ii. Red Light Cameras.
 - iii. The Iowa Smoke-Free Air Act
 - g) The cost of the citation will be deducted from the employee's pay unless other payment arrangements are made in advance.

- h) Any employee with three or more **minor** infractions/violations may not drive for Brecke Mechanical for three years from the date of the first infraction/violation. **Minor Infractions/Violations** include, but are not limited to convictions of:
- i. Moving violations such as speeding, improper lane change
 - ii. Failure to stop at a stop light/sign.
 - iii. Citation for following too close.
- i) Brecke Mechanical will use the matrix below for **MINOR** driving infractions/violations to determine driving eligibility.

Number of Minor Violations: Moving Violation Citations	Number of Minor Violations: Accident Citations			
	0	1	2	3
0	Clear	Acceptable	Probationary	Unacceptable
1	Acceptable	Probationary	Probationary	Unacceptable
2	Probationary	Probationary	Unacceptable	Unacceptable
3	Probationary	Unacceptable	Unacceptable	Unacceptable
4+	Unacceptable	Unacceptable	Unacceptable	Unacceptable

- j) Employees placed on a probationary period must:
- i. Successfully complete a Brecke Mechanical defensive driver, distracted driver, and seat belt training to maintain driving privileges.
 - ii. Based on the frequency and/or severity of a violation(s), additional training may be required to be eligible to operate a Brecke Mechanical vehicle.
 - iii. Employees placed on a probationary period for the second time within 7 years may be required to take a Certified Driver Improvement Program at their own expense.
- k) Any employee with one **major** infraction/violation may **NOT** drive for Brecke Mechanical for three years from the date of the infraction/violation. **Major Infractions/Violations** include but are not limited to convictions of:
- i. Speeding 25 miles or more over the legal speed limit.
 - ii. Leaving the scene of an accident
 - iii. Hit and run.
 - iv. Driving under the influence of a controlled substance and/or alcohol.
 - v. Driving with a denied, barred, revoked, or suspended license.
 - vi. Fleeing an accident or a police officer
 - vii. Vehicle theft
 - viii. Reckless driving
 - ix. Conspiracy and/or misrepresentation of identity
 - x. Use of a vehicle in drug or human trafficking, reckless homicide/manslaughter, unlawful use of a weapon, or any other criminal conviction
- l) Employees with an OWI conviction must complete the OWI 12/48 Hour Program if required by the state and/or court at their own expense.
- m) Employees must submit certification of successful completion of the Driver Improvement Program to the Safety Team Leader within 24 hours of completion or your next scheduled workday.

- n) Employees required to have SR-22 insurance, or a court-ordered ignition interlock device in the vehicle will not be allowed to drive a company vehicle until the SR-22 insurance and the ignition interlock requirement have been removed from their license. An MVR shall be re-run to verify the removal of these requirements.

9.2 HEAVY EQUIPMENT

- A. If the equipment does not have an enclosed cab, standard PPE is required.
- B. Equipment must have a working backup alarm. Listen for backup alarms but never assume they work.
- C. Do not walk or stand beneath or within fall distance of an overhead load.
- D. Overhead loads shall be routed and barricaded with Red Danger Tape so that no employees are exposed to the hazards of a falling load.
- E. Stand clear of any equipment that is moving/dumping a load.

9.3 FORKLIFTS

- A. Any employee operating a powered industrial truck (herein referred to as a forklift) shall be certified and trained prior to operating.
- B. Brecke Mechanical shall maintain 2 qualified trainers.
 - 1) All trainers must have the ability to teach and evaluate operators.
 - 2) Trainers shall be selected by Brecke Mechanical.
- C. In the event that a qualified trainer is not available, training shall be provided by an approved certified trainer.
- D. Seatbelts shall be worn during the operation of a forklift.
- E. The operator shall verify that all trailers and forklifts are chocked and secured during loading, transporting, and unloading.
- F. Appropriate loading and unloading equipment shall be used at all times.
- G. Trainees may operate a forklift **only**:
 - 1) Under the direct supervision of a trainer.
 - 2) Where the operation does not endanger the trainee or other individuals.
- H. Every employee required to operate a forklift will be trained on Forklifts prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Formal instruction, practical training, and operator evaluation.
 - 2) Formal (Classroom) training including, but not limited to:
 - a) OSHA standards
 - b) Brecke policies
 - c) Requirements for maintaining certification and recertification.
 - d) Hazards
 - e) Stability
 - 3) Practical training including, but not limited to:
 - a) Daily inspections
 - b) Instructions
 - c) Load capacities
 - d) Refueling
 - e) Controls
 - f) Visibility
 - g) Safety functions
 - h) Operation

- I. Forklift training evaluation/certification:
 - 1) Any employee operating a forklift shall be subject to safety evaluation by the Safety Team.
 - 2) All employees shall complete a written and practical (operating) evaluation upon the completion of training.
 - 3) Employees passing evaluation/re-evaluation shall be issued a new operator card/certification.
 - 4) Employees shall be re-evaluated at least every three years.
 - 5) Failure of re-evaluation:
 - a) Employees failing to pass re-evaluation shall surrender certification to the evaluator.
 - b) Employee will then be deemed a trainee and shall be retrained and must pass a re-evaluation.
 - c) Re-evaluations must occur prior to the expiration of certification.
- J. Forklift certification:
 - 1) Certifications shall be valid for 3 years.
 - 2) Certification shall be immediately revoked upon failure to pass a safety evaluation or post-incident until successful completion of re-evaluation.
- K. Inspections:
 - 1) Employees required to operate a forklift shall follow the inspection process as outlined in section 3.4.
 - 2) Operators shall complete the "Forklift Daily Pre-Operational Checklist" daily or prior to each shift.

9.4 SCAFFOLDS/AERIAL/SCISSOR LIFTS

- A. Any employee required to work on a scaffold, elevated platform, or operating an aerial/scissor lift shall be trained prior to use as outlined in section 3.3; training shall include:
 - 1) Hazard Analysis:
 - a) Falls
 - b) Falling objects
 - c) Electrical hazard
 - 2) Hazard Correction
 - 3) Fall protection & fall restraint systems.
 - 4) Proper use & inspection of scaffold and aerial lift.
 - 5) Load capacities
 - 6) Policies
 - 7) Site-specific items
 - 8) Special Hazards
 - 9) Pre-job Meetings
- B. A minimum clearance shall be maintained when working around power lines:
 - 1) 10ft for lines with less than 50KV
 - 2) 10 ft plus 0.4 inches for every 1KV over 50KV
- C. Modifications to equipment including lifts and scaffolding shall not be made without prior written approval from the manufacturer.
- D. Employees should stand firmly on the floor and avoid positioning themselves on the rails or the edge of the basket when possible. If this is not possible, appropriate fall protection measures must be implemented as outlined in section 4.7.
- E. **Scaffold guidelines:**
 - 1) Brecke Mechanical does not assemble or disassemble scaffolding.
 - 2) If scaffolding is required and the customer will not provide the scaffolding, Brecke Mechanical will subcontract the scaffolding.

- a) All scaffolding subcontractors must meet the guidelines as outlined in section 2.6
 - b) The subcontractor that is supplying the scaffolding shall be responsible for supplying the site with a “Competent Person”.
 - c) Subcontractors’ safety policies must include information about training, inspections, certifications, tagging, and competent personnel.
 - d) Subcontractors shall be responsible for the scaffolding for the entirety of the job.
- 3) Scaffolding inspections shall be conducted daily by a competent person prior to use as outlined in section 3.4.
 - 4) Any employee may bring concerns regarding the scaffolding to the competent person.
 - 5) Any issues with the competent person shall be brought to the attention of the supervisor(s) or the Safety Team immediately.
 - 6) Scaffolds ready to be used shall be tagged as such and clearly list any hazards.
 - a) **Green-Safe**: Scaffold is safe and ready to use.
 - b) **Yellow-Caution**: Permission is required from a competent person prior to using scaffolding, 100% fall protection is required.
 - c) **Red-Danger**: DO NOT USE any red-tagged scaffolding.

F. Aerial/Scissor lift guidelines:

- 1) Only authorized and trained individuals are to operate an aerial/scissor lift.
- 2) Work shall not exceed load limits.
- 3) If there is not a working backup alarm, a spotter is required.
- 4) Lifts shall not be operated if wind exceeds the manufacturer’s recommendations.
- 5) Lifts shall be lowered prior to moving.
- 6) Every employee operating an aerial/scissor lift will complete a daily inspection prior to starting and operating equipment as outlined in section 3.4; inspections shall include:
 - a) Following the manufacturer’s visual inspection procedures.
 - b) Inspection and testing of lift controls.
 - c) Working backup alarms
 - d) Load limits are clearly marked or defined.
 - e) Area shall be clear of hazards that may cause injury to the operator or cause the lift to tip over.

9.5 CRANES/HOISTING/RIGGING

- A. All rigging and signaling done by Brecke Mechanical shall be done by qualified employees.
- B. Any employee may stop work at any time if a safety concern is observed. Safety concerns must be addressed immediately.
- C. At no time is an employee allowed under a suspended load.
- D. All OSHA standards shall be followed.
- E. Brecke Mechanical employees will not assist in the inspection, documentation, assembly, or disassembly of any crane.
- F. Brecke Mechanical’s involvement in operations shall be limited to rigging and signaling.
- G. No employee is permitted to ride on a load or be suspended from equipment unless it is designed for that purpose by the manufacturer and is being used as recommended by the manufacturer’s guidelines.
- H. **Crane guidelines:**
 - 1) If a crane is required and the customer or other contractor will not provide one, Brecke Mechanical will contract the crane and qualified operator.
 - a) All crane subcontractors must meet the guidelines as outlined in section 2.6.

- b) The rental company and/or contractors shall be responsible for all documentation, qualifications, and certifications.
 - c) Crane shall have manufacturer documentation and procedures in the cab at all times including documentation from the manufacturer of any modifications or additions that may affect the capacity or safe operation of the equipment.
 - d) Contractors shall provide a fully assembled and inspected crane.
 - e) A competent qualified director shall have the needed understanding and knowledge of safe procedures in crane Assembly and Disassembly (A/D) prior to A/D.
 - f) A/D Director shall ensure that the manufacturer's procedures and prohibitions are followed.
 - g) The A/D Director shall be responsible for addressing specific hazards associated with A/D including working within load limits at all times.
 - h) Any qualified person participating in A/D must understand their role and any hazards related to their assigned task prior to starting A/D.
 - i) The A/D Director shall communicate with Brecke Mechanical and other A/D workers about hazardous positions or locations that must be avoided during A/D.
 - j) The crane operator must be qualified and will follow all operational functions of the manufacturer.
 - k) Adjustments to the location may be required to ensure the ground conditions are stable and able to safely support the equipment and any necessary materials as required by the manufacturer.
 - l) Notification to Brecke Mechanical if work cannot begin as planned (such as all safety devices are not in proper working order) and a timeline of when work can start/resume.
 - m) All pre- and post-inspections are completed prior to each shift and monthly by a competent person provided and retained by the company that owns/operates the crane.
 - n) If the equipment, line, or load will be within 20 ft of a power line, Brecke Mechanical shall contact the power company, customer, and general contractor to have said line(s) de-energized and grounded by a qualified individual.
 - o) The crane operator has the authority to stop or refuse loads for a safety concern as long as the concern is communicated to Brecke Mechanical.
 - p) Brecke Mechanical shall mark boundaries of hazardous areas identified by the operator or A/D director including swing radius with warning lines or similar barriers.
 - q) Contractors shall be responsible for the crane for the entirety of the job.
- 2) Signaler must be used if:
- a) Crane operator's view is obstructed.
 - b) Site concerns require it.
 - c) Crane operator determines it is necessary.
- 3) Signalers shall be in constant communication with the crane operator.
- I. Rigging guidelines:**
- 1) All rigging equipment must be inspected prior to each use as outlined in section 3.4.
 - 2) Daily inspections shall be completed and noted on the PJHA.
 - 3) Equipment shall be used within the safe working loads provided by the manufacturer.
 - 4) When rigging equipment is not in use, it shall be stored away from the immediate work area.
 - 5) Rigging equipment shall be used & stored in a manner and location so as to not cause damage or excess wear on the equipment.
 - 6) Tag lines shall be used unless they create an unsafe condition.

- 7) All hooks shall have latches or another acceptable method to eliminate the hook throat opening as provided/recommended by the manufacturer.

J. Hoist guidelines:

- 1) Employees shall follow and adhere to manufacturers' specifications and limitations for equipment.
- 2) Specific hoist items refer to, but are not limited to:
 - a) Rated local capacities.
 - b) Recommended operating speeds.
 - c) Special hazard warnings.
- 3) Every employee required to operate a hoist will be trained on hoist use prior to starting on a job site as outlined in section 3.3; training shall include:
 - a) General use and operation of hoists
 - b) Specific hoist items
- 4) Instructions shall be posted in all operating areas including specific hoist items.
- 5) All rules such as "No Riders Allowed" shall be clearly visible and followed.
- 6) Hoists shall be tested and inspected regularly according to the manufacturer's recommendations no less than annually as outlined in section 3.4.

SECTION 10: LOCKOUT/TAGOUT

10.1 LOTO Guidelines:

- A. Periodic inspections shall be completed by the Safety Team no less than annually to ensure procedures and requirements are being followed.
 - 1) Employees required to perform LOTO shall follow the inspection process as outlined in section 3.4 prior to performing a LOTO function.
 - 2) Any item not locked or tagged shall be treated as energized until the following is proven:
 - a) Equipment/machinery is completely de-energized.
 - b) Locked out and isolated.
 - c) The equipment/machinery can't be re-energized without removing the lockout device.
 - d) There can be no re-accumulation of energy.
- B. Locks and Tags:
 - 1) Each lock shall have a tag and one key.
 - 2) Brecke Mechanical shall issue employees their own lock and tag:
 - a) The tag shall have the employee's name and contact information legibly printed.
 - b) The lock and tag shall be the responsibility of the employee until turned in.
 - 3) Employees shall follow all customer procedures for their sites and equipment.
 - 4) Only the employee(s) whose name is on the tag shall remove the locking device.
 - 5) If an employee is unable to remove the locking device for any reason:
 - a) Contact the Safety Team
 - b) The Safety Team will discuss procedures for removing locking devices, such as cutting a lock and customer notifications.
 - 6) If a lock cannot be used, then tags must be placed at all points of entry/operation and an attendant must be used to ensure tags are followed.
- C. Process:
 - 1) Shutdown must be discussed with affected employees.

- 2) Authorized employees must be knowledgeable of the type, magnitude, and methods of controlling the energy and hazards.
 - 3) Shutting down equipment must be done using normal shutdown routines.
 - 4) The machine or equipment shall be turned off or shut down using the procedures established for that machine or equipment. An orderly shutdown must be utilized to avoid additional or increased hazard(s) to employees as a result of the machine or equipment stoppage.
 - 5) After the equipment is shut down lock out the equipment with the isolation device for that equipment.
 - 6) Equipment shall be tested to ensure stored energy has been removed and isolated.
 - 7) It shall also be verified that no energy can return during isolation.
 - 8) In group lockout situations such as a system lockout or lockbox, all employees must have their own lock and tag attached to the lockout.
 - 9) In the event that a shift or personnel change is necessary:
 - a) Briefings shall take place at shift change and with any personnel change.
 - b) Briefing discussions shall include work completed, work remaining, any safety concerns, and other vital information regarding potential hazards.
 - c) Foreman/Superintendent shall oversee these operations.
 - 10) Prior to unlocking equipment:
 - a) Verify all work has been completed and no Individual(s) is in the area of the equipment operation.
 - b) Verify there is no water or other material that could cause discharge.
 - c) Verify there are no other hazards that may be caused by re-energization.
 - 11) All locks and tags must be removed prior to re-energization.
- D. Every employee required to work in an area or with tools and equipment that have potential electrical exposure will be trained on LOTO prior to starting on a job site as outlined in section 3.3; training shall include:
- 1) Recognizing energy sources:
 - a) Types of energy include but are not limited to:
 - i. Electrical
 - ii. Hydraulic
 - iii. Steam
 - iv. Gas
 - v. Gravity
 - vi. Stored energy (tension)
 - b) Understanding the magnitude of the energy type.
 - 2) Methods for locking out energy sources.
 - 3) Correctly using and completing lock-out tags.
 - 4) Ensuring energy is discharged.
 - 5) Proper unlocking procedures.
 - 6) LOTO limitations.
 - 7) How to use an attendant and when using an attendant is necessary.
 - 8) Customer policies and site-specific items

SECTION 11: ELECTRICAL SAFETY

11.1 ELECTRICAL GUIDELINES

- A. All employees shall initiate the LOTO program prior to working on or near equipment or entering an area with potential exposure to:
 - 1) Exposed energized parts.
 - 2) Arch flash from energized parts.
 - 3) Electrical shock
 - 4) Direct or indirect electrical contact.
 - 5) Other potential electrical risks
- B. Before entering an area with energized electrical equipment always ensure the area is clean and dry unless rated for such conditions.
- C. Only qualified employees with proper PPE may work on energized parts (parts are considered live/energized until proven otherwise).
- D. Any work being conducted near or under overhead power lines requires the power lines to be de-energized and grounded unless a minimum clearance can be maintained:
 - 1) 10 Feet for 50KV or less
 - 2) 10 Feet plus 4 inches for each 10KV over 50KV
- E. Clearances outlined in 11.1.D are required for elevated and non-elevated work and vehicles shall be maintained from any tool, equipment, vehicle, part, pipe, individual, etc.
- F. No Brecke Mechanical employee is qualified to work on overhead power lines.
- G. Employees may not enter spaces unless proper lighting is provided that allows the employee to work safely, especially those containing energized parts.
- H. Protective shields, barriers, and/or insulating materials will be provided if necessary.
- I. Where there is a risk of electrical shock such as:
 - 1) Conductive equipment/tools including ladders shall not be used.
 - 2) Conductive apparel including jewelry shall not be worn or must be covered by non-conductive means.
- J. Flexible cords shall not be run through doorways or windows unless protected or designed for this purpose.
- K. Flexible cords may not be used as a substitute for fixed wiring.
- L. Every employee required to work in an area with potential electrical exposure will be trained in electrical prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Overview of applicable OSHA standards
 - 2) Relationship to job assignments
 - 3) Electrical hazards and exposure identification
 - 4) Possible electrical injuries
 - 5) Mitigation/avoidance of hazards

11.2 NFPA 70E

- A. The Safety Team shall audit this policy at least annually in the field and update it to ensure compliance and effectiveness as needed per findings.
- B. The customer shall be advised of:
 - 1) Any unique hazards presented by the work to be completed.
 - 2) Any unanticipated hazards found during the work.
 - 3) Any hazards corrected and how they were corrected.
- C. Only Qualified employees shall be permitted to work in an arc flash potential area unless it is in an electrically safe work condition.
- D. Limited approach boundary:
 - 1) Only qualified individuals shall complete testing, troubleshooting, and voltage measuring within these areas.

- 2) Arch Flash hazard rating must have been established prior to work beginning.
- 3) PPE must follow hazard rating.
- 4) All electrical policies and procedures must be followed.
- E. A PJHA form and any necessary permits such as Energized Electrical Work Permit shall be completed and reviewed by all affected individuals prior to work beginning.
- F. The customer is responsible for determining the arc flash hazard rating and necessary CAL rating for the areas being worked in/on. Signs, tags, and attendants may be used to alert employees of any hazards.
- G. Any evaluations or arc flash analysis that Brecke Mechanical is responsible for shall be contracted to an approved licensed subcontractor.
- H. Risk assessment review and hazard evaluation including severity, frequency, probability, and avoidance shall be completed during the PJHA process.
- I. Every employee who will be required to work within the limited Approach Boundary will coordinate with the Safety Team and will be trained on NFPA 70E/Arch Flash prior to starting work as outlined in section 3.3; training shall include:
 - 1) NFPA 70E:
 - a) Distinguishing energized exposed parts from other parts.
 - b) Determining nominal voltage of parts.
 - c) Approach distances
 - d) Ways to determine the degree and extent of hazards.
 - e) Job planning
 - 2) Arc Flash
 - 3) OSHA standards, including hazards associated with electrical energy.
 - 4) PPE
 - 5) Training shall be instructed by a third party and maintained for the duration of employment.
- J. Retraining shall be required at least every 3 years or as outlined in section 3.3
- K. Equipment:
 - 1) All equipment including test instruments, and any accessories shall be rated for the circuits and equipment they are to be used on.
 - 2) FR/AR Clothing will be compliant with NFPA 70E.
 - 3) Equipment shall be inspected to ensure it is in proper working order and not damaged or compromised in any way.
 - 4) Test instruments shall be verified before and after the absence of a voltage test.
 - 5) Employees shall follow the inspection process as outlined in section 3.4.
 - 6) Test intervals for rubber-insulating PPE shall not exceed:
 - a) Blankets – before first use and every 12 months after.
 - b) Gloves – Before first use and every 6 months after.
 - c) Sleeves – Before first use and every 12 months after.
 - d) Covers and line hose – if insulating value is suspect.

SECTION 12: EMERGENCY PREPARATION/ACTION PLAN

12.1 EMERGENCIES

- A. Brecke Mechanical's priority during every emergency is to protect personnel from injury or illness and to minimize property damage.

- B. It is the responsibility of every employee to know what to do in the event of an emergency. This plan shall be made available to every employee in printed form upon request and shall be available at any time on the Brecke Mechanical website on the [Safety page](#) in the Safety Manual.
- C. This plan shall be reviewed with employees:
 - 1) During the initial assignment
 - 2) If the plan changes
 - 3) If the responsibility of the employees under the plan changes.
- D. This plan covers actions to be taken under specific emergency conditions such as:
 - 1) Fire
 - 2) Tornado
 - 3) Medical emergencies
 - 4) Other emergencies such as, but not limited to:
 - a) Release (spill) of, or substantial threats of release of, hazardous substances within Brecke Mechanical premises.
- E. Anything of large scale that would require reporting to OSHA or may require coordination with multiple entities shall fall under the Crisis Management Plan.
- F. Emergency lighting shall be maintained in accordance with NFPA 101.
- G. Every Brecke Mechanical Controlled Location has a site-specific emergency disaster plan posted. The emergency disaster plan provides general guidelines on what to do in case of an emergency at that specific site. If you have any questions about what your role is during an emergency or where to locate the full disaster plans, reach out to your supervisor(s), the Safety Team, or Human Resources.
- H. Every location not controlled by Brecke Mechanical shall have a customer-specific emergency plan established by the customer with the assistance of Brecke Mechanical (if applicable).
- I. General supervisor(s)/employee(s) responsibilities in the event of an emergency:
 - 1) All emergencies must be reported immediately to Brecke Mechanical and customers (if required).
 - 2) During an emergency Supervisor(s) must:
 - a) Ensure all parts of the Emergency Preparation/Action Plan are being followed.
 - b) Render assistance to the individual in charge (if necessary).
 - 3) Any employee not involved in the emergency or emergency operations shall stay away from the scene and follow all instructions provided by the Supervisor(s)/personnel in charge.
 - 4) Some customers may have designated "Emergency Response Personnel".
 - 5) Emergency Response Personnel:
 - a) Are trained in the rapid procurement of safe critical plant operations.
 - b) Have a specific job to perform if the situation requires.
 - c) Ensure the overall safety of the plant/facility and take necessary steps to eliminate/minimize any increased severity of an emergency situation.
 - d) Brecke Mechanical employees may be listed as Emergency Response Personnel with prior written approval from the Safety Team.

12.2 MEDICAL/FIRST AID

- A. First Aid Kits shall be kept in/on every Brecke Mechanical vehicle and job site.
- A. Brecke Mechanical First Aid Kits are ANSI Class B rated.
- B. Class B requirements are for industrial settings as recommended by ANSI.
- C. First Aid Kits shall be easily accessible.
- D. First Aid Kits shall be checked weekly and refilled by the person assigned the kit.
- E. First Aid Kits shall be checked annually by a third party.

- B. In the event of an accident, Medcor can assist in walking through first aid operations.
- C. Medcor will refer an employee to a clinic/hospital or inform the employee to call 911 if necessary.
- D. The supervisor(s) shall be responsible for ensuring the employee can get to the hospital/clinic safely.
- E. Any first aid training shall be from the American Red Cross or similar organizations.
- F. Eyewash/safety shower or other suitable flushing methods shall be available for employees who may be exposed to corrosive materials.
- G. Cardiac Arrest:
 - 1) Call 911
 - 2) Then notify the Safety Team.

12.3 FIRE PREVENTION/PROTECTION

- A. Fire extinguishers shall be checked monthly.
- B. Completed checks shall be documented on the back of the fire extinguisher tag and will include:
 - 1) Name of inspector
 - 2) Date inspection was completed.
- C. Fire extinguishers shall be serviced annually on the posted date.
- D. Fire extinguisher tags shall be retained for one year following the annual Servicing.
- E. Trained employees may use the appropriate fire extinguisher to fight incipient stage fires only, and only if the trained employee feels comfortable doing so.
- F. Employees shall inspect their work area daily for potential fire hazards.
- G. Employees shall correct or report any safety hazards immediately to their supervisor(s) and/or the Safety Team.
- H. Electrical heaters may be used prior to inspection and approval by the Safety Team.
- I. Electrical heaters may not be plugged into surge protectors/power strips.
- J. Flammable substances shall be labeled appropriately and stored inside an appropriately labeled fire-rated metal safety cabinet.
- K. Smoking is prohibited in/on any Brecke Mechanical premises.
- L. Candles and other non-work-related open flames are prohibited in any Brecke Mechanical facilities.
- M. At least 18-inch clearance in all directions must be maintained around sprinkler heads.
- N. At least 36-inch clearance in all directions must be maintained around electrical panels and fire extinguishers.
- O. At least 3 feet should be maintained around water heaters and furnaces.
- P. Every employee required to operate a fire extinguisher will be trained on Fire Extinguisher use prior to starting on a job site as outlined in section 3.3; training shall include:
 - 1) Fire extinguisher training
 - 2) Fire classes
 - 3) Types and sizes of fire extinguishers used at Brecke Mechanical.
 - 4) Capabilities and limitations of fire extinguishers.
 - 5) PASS method of using a fire extinguisher.
 - 6) Hazards associated with fire extinguishers and incipient stage fire.
- Q. Fire protection/prevention training shall include:
 - 1) Fire classes
 - 2) Fire Tetrahedron
 - 3) Fire Alarm Systems
 - 4) Sprinkler Systems
 - 5) Fire Exits
 - 6) Boiling liquid Expanding Vapor Explosions.

- 7) Flammable Chemicals/Vapors
- 8) Emergency Action Plan

12.4 CRISIS MANAGEMENT PLAN

A. PURPOSE

- 1) This policy provides guidelines for planning and implementing an effective Crisis Management Program for all B.G. Brecke, Inc. projects.

B. SCOPE

- 1) This policy covers all B.G. Brecke, Inc. employees, subcontractors, vendors, and customers.

C. CRISIS DEFINED

- 1) A crisis is defined as a situation or event that causes or has the potential to cause, a keen public or media concern. Examples of a crisis include, but are not limited to:
 - i. Catastrophic damage to a work site caused by a gas leak, fire, or natural disaster.
 - ii. A major incident that led to multiple injuries or death.
 - iii. Exposure to hazardous substances or material originating from a site that is subject to an investigation or cleanup according to federal, state, or local environmental legislation.
 - iv. Threats such as active shooter or bomb threats directed at Brecke Mechanical that result in media presence.
 - v. Negligent claims alleging defective construction and/or products by Brecke Mechanical resulting in serious injury with media presence.
 - vi. Cyber-attacks such as sending out threats (bomb, active shooter, etc.) to the media and public with the appearance of originating from Brecke Mechanical.
- 2) If you know of a situation or event that could be of concern to the public or media, please contact the Brecke Mechanical Safety Team immediately. The Safety Team will help determine whether the crisis plan needs to be implemented or whether the situation needs to be monitored and handled carefully. If the Safety Team is not available, the crisis or potential crisis must be reported immediately to the Owner(s), Human Resources, and the IT Manager (**IT Manager for cyber-attacks only**) for further direction.

D. The Crisis Management Team includes:

B.G Brecke, Inc. Crisis Management Team			
NAME	TITLE	CELL PHONE	DIRECT LINE
Christian Schwartzhoff	Safety Team Leader	319-550-4558	319-396-7055 Ext. 1148
Terry Lange	Safety Supervisor	319-310-2609	319-396-7055 Ext. 1107
Bret Brecke	Executive Vice-President	319-310-2636	319-396-7055 Ext. 1126
Brad Brecke	President	319-310-2626	319-396-7055 Ext. 1147
Jennifer Lund	Human Resource Manager	319-654-3666	319-396-7055 Ext. 1112
Adam Carpenter (Cyber Crisis Only)	IT Manager	319-774-9233	319-396-7055 Ext. 1004
Crisis Team Email			
crisismanagement@brecke.com			

- E. If the media reaches out with questions regarding the crisis, **DO NOT** comment and direct them to the office for more information.
- F. Do not post anything on any social media platforms including but not limited to comments, photos, and videos.

12.5 HEADCOUNT

- A. A headcount shall be conducted in the event of an evacuation or shelter-in-place to ensure everyone on site made it to safety.
- B. The headcount documentation form is located electronically in the Training Vault or on the company drive and may be used to keep track of large groups spread throughout a large worksite.
- C. Headcount shall be tracked by the following, but not limited to:
 - 1) Visitor sign-in book
 - 2) Time collection system
 - 3) Site-specific staffing process
- D. Designated Individual(s) shall:
 - 1) Check the names of employees present against the names from the tracking lists (if applicable).
 - 2) Shall communicate with each department supervisor to ensure no one was missed (if applicable).
 - 3) Report any missing employees and/or vendors/visitors to emergency personnel.

12.6 SHELTER IN PLACE

- A. **Brecke Mechanical Controlled Locations:**
 - 1) Designated individual shall notify all employees through the phone intercom system by dialing "Paging" on the phone (if available) or by yelling. In a clear voice make the statement outlined in each section twice.
 - 2) A designated individual shall bring the first aid kit (if available), and flashlight (if available) to the shelter.
 - 3) Designated individual(s) will conduct a sweep of their assigned area to ensure everyone has taken shelter if safe to do so.
 - 4) Supervisors shall identify and review the "Shelter in Place" plan for the particular controlled location.
 - 5) Close and stay away from all windows and doors (if applicable) and move to the back of the shelter unless instructed otherwise by trained personnel.
 - 6) Ensure everyone has safely taken shelter by completing the Headcount Procedure as outlined in section 12.5.
 - 7) Trained employees may provide medical aid, but only if the trained employee feels comfortable doing so.
 - 8) Employees must stay in the shelter until the "All Clear" has been given by the fire department, appropriate agency, or a designated competent person.
- B. **Locations Not Controlled by Brecke Mechanical:**
 - 1) Site supervisors shall identify and review the "Shelter in Place" plan for the particular work site.
 - 2) All employees shall follow the shelter-in-place process for the worksite they are at.
 - 3) Close and stay away from all windows and doors (if applicable) and move to the back of the shelter unless instructed otherwise by trained personnel.
 - 4) Ensure everyone has safely taken shelter by completing the Headcount Procedure as outlined in section 12.5.
 - 5) Trained employees may provide medical aid, but only if the trained employee feels comfortable doing so.
 - 6) Employees must stay in the shelter until the "All Clear" has been given by the fire department, appropriate agency, or a designated competent person.

12.7 EVACUATION PLAN

A. Brecke Mechanical Controlled Locations:

- 1) Emergency exits and exit routes shall remain clear at all times.
- 2) Notify all employees through the phone intercom system by dialing "Paging" on the phone (if available) or by yelling. In a clear voice make the statement outlined in each section twice.
- 3) Employees shall evacuate the building immediately following the posted evacuation plan. If the primary exit is blocked by fire or other hazard(s), take an alternate route.
- 4) Designated employees will conduct an evacuation sweep of their assigned area to ensure everyone has evacuated if safe to do so.
- 5) Employees shall meet at the designated rally point.
- 6) Notify the appropriate agency immediately once safe to do so:
 - a) **Fire:** Fire department by (call 911).
 - b) **Gas Leak:** Gas company and the fire department (call 911).
 - c) **Power Hazards:** Local electric company to have all power shut.
- 7) Ensure everyone has safely evacuated the building by completing the Headcount Procedure as outlined in section 12.7.
- 8) Trained employees may provide medical aid, only if the trained employee feels comfortable doing so.
- 9) Employees must not reenter the facility until the "All Clear" has been given by the fire department, appropriate agency, or a designated competent person.

B. Locations Not Controlled by Brecke Mechanical:

- 1) Site supervisors shall review the "Evacuation" plan for that particular work site.
- 2) Emergency exits and exit routes shall remain clear at all times.
- 3) All employees shall follow the evacuation process for the location they are at.
- 4) Employees shall evacuate the building immediately following the posted evacuation plan (if available). If the primary exit is blocked by fire, take an alternate route.
- 5) Employees shall meet at the designated rally point for that particular worksite.
- 6) Notify the appropriate agency if/when needed:
 - a) **Fire:** Fire department immediately once safe to do so by calling 911.
 - b) **Gas Leak:** Gas company and the fire department 911 immediately once safe to do so.
 - c) **Power Hazards:** Electric company to have all power shut down.
- 7) Ensure everyone has safely evacuated the building by completing the Headcount Procedure as outlined in section 12.7.
- 8) Trained employees may use the appropriate fire extinguisher to fight incipient stage fires only, only if the trained employee feels comfortable doing so.
- 9) Trained employees may provide medical aid, only if the trained employee feels comfortable doing so.
- 10) Employees must not reenter the facility until the "All Clear" has been given by the fire department, appropriate agency, or a designated competent person.

12.8 FIRE

- A. Employees shall evacuate the building immediately following the posted evacuation plan as outlined in section 12.7.
- B. Pull the nearest fire alarm (if applicable)

- C. In a clear voice make this statement twice, **“Attention: There is a fire (state location of the fire) please evacuate the building immediately and meet at the designated rally point located (state the designated rally point location).”**
- D. Call 911 when safe to do so.

12.9 GAS LEAK

- A. Employees shall evacuate the building immediately following the posted evacuation plan as outlined in section 12.7.
- B. In a clear voice by making this statement twice, **“Attention: There is a gas leak in the building. Please proceed to the nearest exit immediately and meet at the designated rally point located (state the designated rally point location).”**
 - 1) Do Not use the intercom system or cell phones due to the danger of igniting the gas.
 - 2) Do Not turn light switches on or off (including breakers and overhead door openers).
- C. Once safe to do so call 911 and notify the gas company.

12.10 POWER FAILURE

- A. If power is restored within a short period of time work will resume. If Power is not restored and no other work can be performed the work site will be shut down until the power resumes. If there is a shutdown due to power failure Brecke Mechanical will not pay you for the time not worked.
- B. If there is a life-threatening situation call 911 immediately.
- C. If power lines are down:
 - 1) Do not approach or move power lines.
 - 2) Do not attempt to approach or move someone trapped by a power line.
- D. Call the electric company to have all power shut down.

12.11 TORNADO/SEVERE WEATHER

- A. **Tornado/Severe Weather Watch:** Weather conditions are such that the possibility of a tornado or severe weather exists. No alarm is given.
 - 1) Designated employees shall:
 - a) Monitor the progress of the tornado/severe weather warning.
 - b) Check flashlights (if available), first aid kits (if available), and shelters to ensure the area is ready in the event a Tornado/Severe Weather Watch becomes a Tornado/Severe Weather Warning.
- B. **Tornado/Severe Weather Warning:** An actual tornado or severe weather has been sighted or is in the imminent area.
 - 1) Employees shall take shelter immediately following the posted shelter-in-place plan as outlined in section 12.6.
 - 2) Designated individual shall:
 - a) In a clear voice make this statement twice, **“Attention: The emergency Tornado/Severe Weather sirens have sounded. Please proceed to the nearest designated emergency shelter (state the designated shelter location) immediately”.**

12.12 BLIZZARD

- A. Supervisor(s) shall notify employees of what steps to take.

- B. Remain inside the facility unless instructed otherwise by emergency personnel.
- C. **If driving:**
 - 1) Ensure your headlights are on so you are visible to other drivers.
 - 2) Drive slowly and allow longer distances to stop.
 - 3) Note your location in case you become stranded.
 - 4) Pull over if necessary.
- D. **If stranded:**
 - 1) Run the engine at 10-minute intervals to conserve fuel and heat.
 - 2) Keep the tailpipe clear from snow.
 - 3) Hang a piece of fabric from the window to remain visible to emergency personnel.
- E. Call 911 and the Safety Team immediately and let them know of your location.

12.13 CHEMICAL RELEASE - SPILL/TOXIC LEAK

- A. If the spill/leak is **inside the facility**, evacuate the area immediately following the posted evacuation plan as outlined in section 12.7:
 - 1) In a clear voice make this statement twice, **“Attention: There is a chemical release (state location of the chemical release) please evacuate the building immediately and meet at the designated rally point (state the designated rally point location)”**.
- B. If the spill/leak is **outside the facility**, shelter-in-place immediately following the shelter-in-place plan as outlined in section 12.6.
 - 1) Remain inside away from doors and windows.
 - 2) In a clear voice make this statement twice, **“Attention: There has been a chemical release. Please proceed to the nearest designated emergency shelter (state the designated shelter location) immediately”**.
- C. Call the applicable agencies:
 - 1) 911
 - 2) Poison Control (800) 222-1222
 - 3) The National Response Center (800) 424-8802

12.14 BOMB THREAT

- A. Bomb threats may be received via phone, email, letter, note, or in person.
- B. If you receive a bomb threat, follow your training and the steps outlined in the Bomb Threat Procedure form located electronically on the company drive.
- C. Call 911 immediately once safe to do so.

12.15 ACTIVE SHOOTER

- A. If an active shooter is on the premises, follow your training and the steps outlined in the Active Shooter procedure located electronically on the company drive.
- B. Call 911 immediately when safe to do so.

12.16 NUCLEAR EVENT

- A. Follow the Duane Arnold Emergency Preparedness Plan located in the Training Vault under the Company Resources tab, on NEXTere.Energy’s website and on the company drive.

12.17 CUSTOMER-SPECIFIC EMERGENCY PLAN

- A. A specific emergency plan for each customer facility shall be established by the customer with Brecke Mechanical's assistance (if applicable).
- B. Employees responsible for operations on that site have specific obligations including:
 - 1) Understanding Brecke Mechanical's responsibilities and actions required under this plan.
 - 2) Train employees at the worksite in emergency procedures.
 - 3) Complete the customer EAP form with the information pertaining to the customer's plan.
- C. If a site is not controlled by a particular customer and/or General Contractor:
 - 1) An action plan shall be created by the individual responsible for operations in coordination with the Safety Team (if requested).
 - 2) Prior to any construction or new site work, a site map of the project shall be developed or if it has already been developed, the completed map shall be obtained.
- D. The "Safe Work Plan" shall identify:
 - 1) Usage area
 - 2) Hazards
 - 3) Emergency Action Plan

12.18 WORKPLACE-RELATED INCIDENTS/ACCIDENTS

- A. All incidents/injuries involving vehicle, machinery, equipment, near misses, falls, radiation exposure, theft, property damage, or any other workplace incidents/injuries, must be reported to the supervisor(s), Team Leader, Safety Team, and customer (only if required or relevant to the customer) immediately. When an incident is reported promptly, we can provide immediate medical care, investigate promptly, follow all required laws, and start the insurance and workers' compensation process quickly.
- B. If the incident warrants, Brecke Mechanical shall cooperate with any customer or law enforcement agency in reviewing and investigating any incidents.
- C. Unless it is an emergency, under no circumstances are you to go to a doctor, medical clinic, or chiropractor without reporting to the safety team first for instructions.
- D. **Workplace incident/injury steps:**
 - 1) Assess the situation.
 - 2) If the individual is still in a dangerous location, remove them if safe to do so.
 - 3) Call 911 if necessary.
 - 4) Call the Safety Team
 - 5) Contact the supervisor(s). The supervisor(s) and employee will contact Medcor and follow up with the Safety Team.
 - 6) A Brecke Mechanical representative shall accompany any employee who is taken for medical treatment/care.
- E. **Incident/Accident Investigation:**
 - 1) All incidents will be investigated, and the level of investigation will be determined by:
 - a) Potential frequency.
 - b) Potential severity.
 - 2) An Incident/Accident Investigation form must be used for all investigations.
 - a) Provide all witness statements with the Incident/Accident Investigation form.
 - b) Corrective Actions and lessons learned must be communicated to employees with like exposure.
 - 3) The Safety Team and/or the Crisis Management Team shall be responsible for all aspects of the investigation including ensuring proper equipment is available for the investigation process.

- 4) The following individuals shall assist in the investigation process:
 - a) Supervisor(s)/Team Leader of the affected employees.
 - b) Affected employees.
 - c) Witness(es) to the incident/accident.
 - d) Safety Team
 - e) Human Resources
 - f) Brecke Mechanical President and/or Executive Vice President
- 5) Initial identification of evidence shall occur immediately or as soon after the incident/accident as is safe to do so.
- 6) Any evidence must be collected, preserved, and secured through:
 - a) Pictures
 - b) Notes and/or sketches
 - c) Barricade/quarantine off the area.
 - d) Impounding or confiscation of equipment.
 - e) Other means necessary and/or permitted.
- 7) The Safety Team and/or Crisis Management Team shall be trained in their roles, responsibilities, and incident investigation techniques.
- 8) Fatalities must be reported to OSHA & the customer (if applicable) within 8 hours.
- 9) Amputation, loss of an eye, and/or hospitalization must be reported to OSHA and the customer (if applicable) within 24 hours.

SECTION 13: VISITORS IN THE WORKPLACE

13.1 VISITORS/VENDORS/CUSTOMERS

- A. Brecke Mechanical is committed to keeping our employees, customers, visitors, and vendors safe while on the premises.
- B. Visitors are any non-Brecke Mechanical employee in/on the premises.
- C. Because visitors may be unaware of the hazards in/on our premises, they may inadvertently endanger themselves or others through improper practices.
- D. Some potential outcomes could be injury up to death, property damage, business interruption, mishandling of confidential material, and theft.
- E. Procedures and controls to keep all visitors safe (include, but are not limited to):
 - 1) Authorized visitors 18 years of age or older may enter any Brecke Mechanical premises where the business/visit will be conducted.
 - 2) Visitors under the age of 18 years old must always be accompanied by an adult. Visitors under the age of 18 years are prohibited from being in an area that is marked by a yellow safety line or requires the use of PPE even when accompanied by an adult.
 - 3) All visitors should enter Brecke Mechanical through the main entrance of the location they are visiting where they will sign in (if available) and be escorted by their POC.
 - 4) If you are the POC for a visitor, you are responsible for their safety, you must provide all required safety training and PPE for the areas they will have access to.
 - 5) If you see an unauthorized individual in the building, notify your supervisor(s) immediately and/or direct the individual to the main entrance.
 - 6) Animals other than service animals are prohibited from entering any Brecke Mechanical premises.

SECTION 14: DRUG & ALCOHOL-FREE WORKPLACE

14.1 SAFE AND HEALTHY WORKPLACE

- A. This policy shall apply to all applicants and current Brecke Mechanical employees.
- B. Our goal for the Drug & Alcohol-Free Workplace program and the regulated DOT Drug and Alcohol policy is to create and maintain a safe healthy workplace as well as encourage employees to voluntarily seek substance abuse help benefiting both the employee and Brecke Mechanical. If you have any questions or concerns regarding Brecke Mechanical's Drug and Alcohol policy, please reach out to your supervisor(s), the Safety Team, Human Resources, or any other Brecke Mechanical Safety Representative. Employees in violation and/or who refuse to comply with this policy may be subject to disciplinary action, up to and including termination of employment.
- C. All communications received relevant to an employee or prospective employee regarding drug and alcohol screening/testing results are kept confidential. Results are only shared with individuals/entities that have a legitimate business need and once proper employee/prospective employee consent has been obtained.
- D. It is well recognized that individuals who use illicit drugs, or abuse alcohol and prescribed drugs are more likely to have workplace accidents, incur greater amounts of lost time, and perform work in a substandard manner creating a serious production, safety, and health risk for you, other employees, customers, vendors, and the public.
- E. All applicants shall be notified of Brecke Mechanical's pre-employment drug screen process and shall have access to Brecke Mechanicals full Drug and Alcohol policy which includes:
 - 1) Screening/testing requirements.
 - 2) Available substance abuse assistance.
 - 3) Positive test/refusal to test.
 - 4) Prohibited conduct.
- F. Education/Information shall be provided on:
 - 1) Effects of drug and alcohol use.
 - 2) Signs and symptoms of substance abuse.
- G. Brecke Mechanical reserves the right to (including, but not limited to):
 - 1) Inspect lockers, packages, or containers of any kind (including shopping bags, lunch bags, purses, briefcases, backpacks, etc.,) that are on company premises regardless of working hours.
 - 2) Conduct drug and alcohol screening/testing.
 - 3) Require employees to report to a company-designated licensed healthcare provider for a physical examination (which may include breath, saliva, and urine testing for alcohol and/or chemical substances).
 - 4) Move an employee who has submitted to a drug and/or alcohol screen/test no matter the circumstance (post-accident, reasonable cause, etc.) to a non-safety sensitive job function or may choose to suspend the employee without pay pending the results of the screening/testing. If the results are "Negative" the employee may be paid for their time on suspension.

14.2 PROHIBITED CONDUCT

- A. Types of prohibited behavior (including, but not limited to):
 - 1) Refusal to submit to a drug or alcohol screen/test.
 - 2) Possession, use, and/or consumption, of prescribed, non-prescribed cognitive/mood-altering legal or illicit chemicals/drugs, inhalants, or substances (such as bath salts, paint,

glue, etc.) that mimic the effects of a cognitive/mood altering drug that affects an employee's ability to perform work safely.

- 3) Misuse of prescribed cognitive/mood-altering legal drugs or inhalants.
- 4) Buying, selling, soliciting, transporting, offering, and/or receiving illicit drugs or medication prescribed to another individual in/on any Brecke Mechanical premises.
- 5) Reporting to work, working while impaired, by alcohol, drugs, or inhalants, and/or consuming drugs, alcohol, or any other substance until tested post-accident/incident.
- 6) Use of Tobacco except in designated areas or the use of an ESD.
- 7) The use or consumption of alcohol on company premises is prohibited, except at company-sponsored events when authorized by the President, Executive Vice President, or Human Resources.
- 8) Alcohol possession (including prescribed or over-the-counter medications that contain alcohol) in any bottle or receptacle containing alcohol that has been opened, has the seal broken, or the contents of which have been partially or completely removed.
- 9) Employees may possess containers holding alcohol in/on Brecke Mechanical premises as long as the seal is unbroken (**closed, sealed, unopened**).
- 10) Employees shall not tamper, substitute, or adulterate any sample provided for drug and alcohol screening/testing to alter the results/outcome of the screening/testing.
- 11) Conviction, guilty plea, or otherwise accepts any form of legal reprimand for drug and/or alcohol-related matters.

14.3 PRESCRIPTION & OVER-THE-COUNTER DRUGS

- A. Employees may bring and take prescribed and over-the-counter drugs during working hours only if:
 - 1) The drug is prescribed for the employee taking it.
 - 2) The drug is being taken as prescribed by an authorized healthcare professional or Prescriptive Authority.
 - 3) The over-the-counter drug is being taken as intended by the manufacturer.
 - 4) The drug does not impair the employee's ability to perform their job satisfactorily and safely.
 - 5) All drugs must be stored in the container they were dispensed in by a legitimate pharmacy/dispensary/manufacturer.
- B. Employees must notify their supervisor(s) and the Safety Team immediately if they will be taking a prescribed drug or an over-the-counter drug that has a "Do not drive or operate machinery" warning label or may have side effects that could potentially create an unsafe work environment for you, other employees, customers, vendors, and the general public.

14.4 DRUG & ALCOHOL SCREENING/TESTING

- A. A Brecke mechanical authorized collector shall perform a drug screen/test on all potential and current employees.
- B. Brecke Mechanical authorized collectors shall complete initial training prior to performing a drug and/or alcohol screen and annually thereafter.
- C. Unless a specific method of collection is required, an authorized collector shall determine which method of testing will be performed (breath, saliva, urine, etc.).
- D. Once an individual has been notified of the start of the screening/testing process the individual shall not leave the supervision of the authorized collector until the collector has announced the process is over.
- E. If an alcohol screen/test is required, it shall be performed and completed prior to a drug screen/test.

- F. In the event a urine screen/test is not required by the DOT, customer, job site, legal documentation, or legal official, Brecke Mechanical may elect to use a saliva drug screen that replicates the 10-panel urine kit.
- G. The authorized collector shall complete the steps outlined below to ensure the correct identity of the individual being screened/tested as well as to verify the specimen has not been tampered with prior to the screen/test being performed.
 - 1) The individual shall provide a valid picture ID, and any other reasonable documentation requested to verify identity.
 - 2) Ensure the individual being screened/tested has inspected the testing kit to confirm the container has not been tampered with.
 - 3) Shall always follow the chain of custody throughout the process.
- H. Brecke Mechanical will conduct a 10-panel drug screen/test.
 - 1) Brecke Mechanical may expand screening/testing as permitted by law.
- I. Brecke Mechanical will be responsible for all required drug/alcohol screen/test costs that are associated with the contingency of employment.
- J. A sufficient breath, saliva, and/or urine specimen must be provided to successfully complete the drug and/or alcohol screening/testing process.
- K. If an individual is not able to produce a sufficient specimen, they shall complete the following:
 - 1) Non-DOT: Shall submit to a medical evaluation by a licensed medical practitioner to determine if the individual is medically unable to provide a sufficient amount of breath, saliva, and/or urine for testing. If a medical professional has determined and documented a medical condition the individual shall submit to a lab-based collection.
 - 2) DOT only: Shall follow the appropriate DOT regulation for the specimen and test.
- L. **Saliva** drug screening:
 - 1) Saliva screening shall be performed after a 10-minute waiting period where nothing is in the individual's mouth. A waiting period is not required between a saliva alcohol screen and a saliva drug screen being performed.
 - 2) If the individual is unable to produce a sufficient volume of saliva required in their first attempt or after 15 minutes of using the collection device, the individual may drink up to 8 ounces of water only and wait for an additional 10 minutes before beginning collection again. A period of one hour shall be provided or until the individual has provided a sufficient sample whichever occurs first.
 - 3) If the results of a saliva screen are non-negative, Brecke Mechanical may request an individual to provide a urine sample to be sent to the laboratory for confirmation testing.
- M. **Urine** drug screening/testing:
 - 1) An individual shall be permitted to provide a urine specimen in private unless there is just cause such as there is reason to believe the specimen may be altered or substituted.
 - 2) A minimum of forty-five (45) ml of urine must be provided in a single voided specimen. Specimens may be split after the initial collection to allow for laboratory confirmation.
 - 3) If the individual is unable to provide a sufficient volume of urine required in their first attempt, the individual will be encouraged to drink up to 40 ounces of fluid, distributed reasonably over a period of up to three hours, or until the individual has provided a sufficient urine specimen whichever occurs first.
 - 4) If the initial results of a urine screen are non-negative, Brecke Mechanical shall send the specimens that were split between two bottles by the collector to an approved laboratory under the Iowa Department of Public Health and Iowa Code 730.5 and subsequent amendments thereto for confirmation drug testing.
 - 5) **Both** bottles shall be sent to an approved laboratory for further analysis:

- a) A minimum of thirty (30) ml shall be collected in the first bottle and will be used for the primary analysis.
 - b) A minimum of fifteen (15) ml shall be collected in the second bottle and will be held by the laboratory pending a request by the individual who provided the specimen in the event of a verified positive result from the primary specimen.
- 6) Requests to have the second specimen tested at another facility following a verified positive result:
- a) **NON-DOT Individuals:** Must provide a written request within 7 days of being notified by Brecke Mechanical in person or by certified mail with a return receipt requested. The request shall include:
 - i. The desire to have the second confirmatory test completed.
 - ii. Identify the approved laboratory of the individual's choice to have the test conducted. The cost of the second confirmatory test is to be paid for by the employee.
 - iii. The payment shall be made payable to B.G. Brecke, Inc. and in the form of a cashier's check or money order in the amount of \$250.00. Should the second confirmatory test be reported as a "Negative", Brecke Mechanical shall reimburse the employee the \$250.00 fee.
 - b) **Additional steps for DOT only Individuals:**
 - i. In addition to the factors listed above (13.4.N.6.a.i through iii), DOT individuals must provide a written request within 72 hours of being notified by the MRO of their right to have the second bottle analyzed at a separate DHHS laboratory.
- 7) The confirmation drug analysis shall use gas chromatography/mass spectrometry (GCMS).
- 8) Prior to Brecke Mechanical being notified of a verified positive, the individual will be given the opportunity to speak with Brecke Mechanical's MRO to determine if there is a medical explanation regarding the results. This opportunity is given prior to the results being confirmed positive/negative and shared with Brecke Mechanical.
- a) If a medical explanation exists, the results will be reported as a "Negative" and no additional testing is required.
 - b) If a medical explanation exists, but the amount in the system exceeds the prescribed amount, the results will be reported as a "Confirmed Positive".
 - c) If a medical explanation does not exist, the results will be reported as a "Confirmed Positive".

N. Alcohol screening/testing:

- 1) An alcohol screen will show "non-negative" if the relative Blood Alcohol Concentration (BAC) is at or above 0.02%.
- 2) If an alcohol screen is "non-negative" employees shall be taken to a Brecke Mechanical-approved testing facility/lab, or to law enforcement for confirmation using a Breath Alcohol Test.
- 3) Breath Alcohol tests shall be administered by a trained Breath Alcohol Technician (BAT) and conducted with an Evidential Breath Tester (EBT).
- 4) Breath Alcohol test results that register less than 0.02% on the confirmation test will be reported as "Negative" and no additional alcohol testing is required.
- 5) Breath Alcohol test results that register 0.02% or higher on the confirmation test shall require a second confirmation test.
 - a) If the results register less than 0.02% on the second confirmation test it will be reported as "Negative".
 - b) **Non-DOT**

- i. For results that register at 0.02% but less than 0.08% on the second confirmation test the results will be reported as “Negative” but at a level too high to safely perform work and as such the employee shall be removed from duty, and they will not be eligible to return to work until the start of their first scheduled shift 24 hours from the time they tested and will require a second confirmation test.
 - ii. For results that register a 0.08% or higher on the second confirmation test, it will be a “Confirmed Positive”.
- c) **DOT**
- i. For results that register at 0.02% but less than 0.04% on the second confirmation test the results will be reported as “Negative” but at a level too high to safely perform work and as such the employee shall be removed from duty, and they will not be eligible to return to work until the start of their first scheduled shift 24 hours from the time they screened and will require a second confirmation test.
 - ii. For results that register a 0.04% or higher on the second confirmation test will be a “Confirmed Positive”.

O. Non-DOT and DOT Conditions for Testing:

1) Pre-Employment:

- a) Conducted once a job offer has been accepted, prior to the applicant being hired and performing any paid job duties and shall include:
- b) A specimen for a 10-panel instant pre-employment drug screen completed by an approved creditable collector at a collection site or laboratory facility.
- c) Brecke Mechanical may or may not require an observed drug screen/test.
- d) If an applicant can provide documentable proof of a negative drug screen/test performed within the last 90 days and the drug screen/test that was completed was a replication of the 10-panel instant pre-employment drug screen performed by Brecke Mechanical, the pre-employment drug screen/test may be waived.
- e) Refusal of a pre-employment drug screen/test or if the pre-employment drug screen/test is confirmed positive the applicant will not be eligible for hire without completing one of the steps as outlined in section 14.5.C.1.a.
- f) **Additional conditions of Pre-Employment testing for DOT employees ONLY:**
 - i. In addition to a 10-panel instant pre-employment drug screen, a DOT Federal drug test for all DOT drivers shall be conducted at a Brecke Mechanical-approved testing facility/lab.
 - ii. The urine sample for the DOT Federal test shall be collected first, and the 10-panel instant shall be collected second.

2) Random:

- a) Conducted randomly based on a computer-generated random list provided by Brecke Mechanical’s Third-Party Administrator (Brecke Mechanical has no influence over this list). Random drug screens/tests shall be unannounced.
- b) The random selection process shall ensure every Brecke Mechanical employee has the chance of being selected each time.
- c) An employee shall be notified of their selection and instructed to report to the Brecke Mechanical approved collection site immediately.
- d) Random drug screen/test means the screen/test may be performed before, during, or after performing a work-related function.
- e) **Additional conditions for Random screening/testing for DOT employees only:**

- i. If selected, in addition to the factors listed above, DOT employees may also be required to submit to an Alcohol test.
 - ii. The urine sample for the DOT Federal test shall be collected first, and the 10-panel instant shall be collected second.
- 3) **Post-Accident/Incident:**
 - a) Conducted as soon as practical post-incident/accident.
 - b) **For the purpose of this policy, an incident/accident is defined as:** A crash, collision, or disaster involving a Brecke Mechanical employee, location, vehicle, and/or equipment, resulting in injury requiring medical attention away from the scene of the incident/accident, death or:
 - i. Vehicle damage that has been reasonably assessed to have caused a minimum of \$1,000 in damage.
 - ii. Property damage that has been reasonably assessed to have caused a minimum of \$5,000 in damage.
 - c) **Testing shall occur in the event of:**
 - i. Incident/Accident that has caused bodily injury.
 - ii. Motor vehicle accident/collision involving one or more vehicles.
 - iii. Equipment incident/accident
 - iv. Employee received a citation under state or local law for moving traffic violation resulting from an accident.
 - v. Loss of human life
 - vi. Any other situation that has caused an injury or property damage.
 - d) A drug and/or alcohol test shall be performed if the accident/citation occurs within 2 hours and no later than 8 hours. If an alcohol test is performed at the scene by An EBT certified law enforcement officer and conducted with an Evidential Breath Tester (EBT) from the Confirmed Products List, it shall be accepted as Brecke Mechanicals post-accident screen/test. Employees must contact their supervisor(s) immediately with the officer's name, badge number, and contact information for verification.
 - e) A drug test ONLY shall be performed if the accident/citation occurs within 32 hours.
 - f) Contact your DER immediately for the proper protocol to follow regarding post-accidents.
 - g) **Failure to test within the required timeline shall result in:**
 - i. **Alcohol test:** If a required test is not performed within the first 2 hours and no later than 8 hours following the accident, Brecke Mechanical shall prepare and retain a written statement explaining the reason the test was not promptly performed. Records shall be submitted to the FMCSA upon request.
 - ii. **Controlled Substance Test:** If a required test is not performed within the first 32 hours following the accident, Brecke Mechanical shall cease attempts to administer a drug test and shall prepare and retain a written statement explaining the reason the test was not promptly performed. Records shall be submitted to the FMCSA upon request.
 - h) **DOT ONLY Employees Additional Conditions for Post-Accident:**
 - i. In addition to the factors listed above, DOT employees shall also be required to submit to a Federal DOT test.
 - ii. The urine sample for the DOT Federal test shall be collected first, and the 10-panel instant shall be collected second.
- 4) **Return to Duty/Follow-Up:**

- a) Conducted prior to returning to work or as required by the SAP program.
 - b) **Return to Duty Testing:**
 - i. Prior to returning to work after successful completion of a substance abuse treatment program
 - ii. Prior to returning to work after an extended leave of absence (length of time is at the discretion of Brecke Mechanical).
 - c) **Follow-Up Testing:**
 - i. Shall be conducted in accordance with the treatment schedule provided by Brecke Mechanicals SAP program.
 - ii. Screen/test shall be random and unannounced prior to the employee being notified.
- 5) **Reasonable Suspicion:**
- a) Conducted when an employee's behavior has been observed by a trained individual to raise concern that the employee may be under the influence of drugs and/or alcohol.
 - b) Reasonable suspicion is determined by assessing an employee's appearance, behavior, speech, odor (breath, clothes, etc.), or physical symptoms that align with drug and/or alcohol use and shall be documented on the "Observed Reasonable Suspicion Form" located on the company drive.
 - c) An observation must be made in person and by two individuals who have successfully completed the initial two-hour education program and the annual one-hour refresher course thereafter. The educational course shall include behavioral, physical, speech, and performance indicators of possible drug and/or alcohol use.
 - d) Employees shall be pulled aside to be notified of the observed reasonable suspicion requiring a drug and/or alcohol screen/test. The Employee shall be immediately taken to an approved Brecke Mechanical collection site by two Brecke Mechanical Safety Representatives.
 - e) After the reasonable suspicion drug and/or alcohol screen/test has been completed a Brecke Mechanical representative shall transport the employee home or line up other means of transportation by reaching out to the employee's emergency contact, family, or other person designated/requested by the employee.
 - f) If the employee refuses transportation, Brecke Mechanical reserves the right to take any appropriate means necessary to protect the well-being of the employee and the public including, but not limited to reaching out to local law enforcement.
 - g) **DOT ONLY Employees Additional Conditions for Reasonable Suspicion:**
 - i. In addition to the factors listed above, DOT employees may also be required to submit to an Alcohol test.
 - ii. The urine sample for the DOT Federal test shall be collected first, and the 10-panel instant shall be collected second.
- 6) **Customers Required:**
- a) Conducted at the request of a customer and may require a drug and/or alcohol test in lieu of a drug and/or alcohol screen for a specific job site.
 - b) A drug screen shall still be completed on the same sample.
 - c) A negative result is required to continue working on the specific job site for the customer.

14.5 CONFIRMED POSITIVE RESULT/FAILURE TO PRODUCE/REFUSAL TO DRUG SCREEN/TEST

A. Refusal/Failure is considered a Confirmed Positive and occurs when:

- 1) An individual refuses/fails to appear for any drug and/or alcohol screen/test within a reasonable time.
 - 2) An individual refuses/fails to remain at the testing site until the drug and/or alcohol screen/test process is complete.
 - 3) You refuse/fail to provide:
 - a) A saliva or urine specimen for a drug and/or alcohol screen/test.
 - b) A saliva and/or breath specimen for an alcohol screen/test
 - c) Refuse/fail to produce an adequate amount of breath, saliva, or urine and there is no medical explanation for the failure to produce an adequate specimen.
 - 4) In the case of a required directly observed or monitored drug and/or alcohol screen/test collection, you refuse/fail to permit the observation or monitoring of the collection of the specimen.
 - 5) An individual refuses/fails or declines to submit to an additional drug and/or alcohol screen/test when directed by Brecke Mechanical, a customer, or an authorized collector.
 - 6) An individual refuses/fails to undergo a medical examination or evaluation as part of:
 - a) The verification process for drug and/or alcohol screen/test or as directed by the designated employer representative (DER).
 - b) "Shy Bladder" procedures for drug and/or alcohol screen/test.
 - c) Insufficient breath and/or saliva procedures for alcohol screen/test.
 - 7) An individual refuses/fails to provide the required valid ID and/or documentation for identity verification requirements.
 - 8) An individual refuses/fails to cooperate with any part of the testing process.
 - 9) Employee has a verified adulterated or substituted drug screen/test.
- B. **Confirmed Positive** occurs when:
- 1) The specimen you have provided fails the drug and/or alcohol screen/test provided by Brecke Mechanical, and the results have been confirmed via a certified drug-testing laboratory and verified by an approved MRO.
- C. Confirmed Positive drug and/or alcohol screen/test next steps:
- 1) Upon a "Confirmed Positive" due to failure or refusal to submit to a drug and/or alcohol screen/test or upon a laboratory-confirmed positive result:
 - a) **Pre-Employment:** The applicant will not be eligible for hire without completing one of the following:
 - i. Complete a six-month waiting period from the date of the "Confirmed Positive" test and provide a negative result by completing an observed drug screen/test at an approved Brecke Mechanical collection site.
 - ii. Successful completion of a SAP evaluation and any recommended treatment by a Brecke Mechanical-approved Substance Abuse Professional. Certification of completion must be submitted directly to Brecke Mechanical by the SAP facility.
 - b) **Current Employees:** Employees will be considered medically unqualified to drive a Brecke Mechanical vehicle and physically unqualified to perform work duties without completing the following:
 - i. Employees must notify Brecke Mechanical in writing within 30 days of the "Confirmed Positive" test of their intention to be evaluated and complete the treatment as recommended by the Substance Abuse Professional (SAP).
 - ii. Successful completion of a SAP evaluation and any recommended treatment by a Brecke Mechanical-approved SAP. The evaluation/treatment must be started within 60 days of the confirmed positive test or refusal.

Certification of completion must be submitted directly to Brecke Mechanical by the SAP facility.

- iii. Must provide a "Return to Duty" negative result by completing an observed drug screen/test at an approved Brecke Mechanical collection site.
 - iv. If the employee fails to meet the deadlines as described in this section, it shall be treated as a "Refusal to be Evaluated".
 - v. Any refusal to be evaluated, or failure to successfully complete the recommended treatment within 60 days of the "Confirmed Positive" shall be considered a voluntary termination of employment by the employee, and they will not be eligible for rehire until they have successfully completed the required steps outlined above.
- 2) Any cost incurred for the SAP evaluation and treatment is the responsibility of the employee.
 - 3) Brecke Mechanical is not obligated to reinstate or retain any employee who violates any of Brecke Mechanical's prohibitions or requirements concerning drugs and/or alcohol.
- D. Exceptions per Iowa Code 730.5:
- 1) The cost for rehabilitation shall be apportioned as provided under the employee benefit plan.
 - 2) Under the following conditions, Brecke Mechanical may be required to pay up to \$2,000 in rehabilitation costs for an employee:
 - a) Upon receipt of a confirmed positive alcohol screen/test which indicates a concentration greater than the concentration level established by this policy (0.04% BAC for DOT employees and 0.08% for non-DOT employees).
 - b) If there are at least 50 people employed.
 - c) The employee has been employed by Brecke Mechanical for at least 12 of the preceding 18 months.
 - d) The employee is a first-time violator of Brecke Mechanical's substance abuse policy.
 - e) Employee has agreed to receive rehabilitation. Depending on employee benefit plan coverage.

14.6 FMCSA CLEARINGHOUSE

- A. FMCSA regulations require employers to inform drivers and driver applicants that the following information will be reported to the Clearinghouse.
- 1) Verified positive test, adulterated, or substituted drug test result.
 - 2) An alcohol confirmation test result with a concentration of 0.04% or higher.
 - 3) A refusal to submit to a drug and/or alcohol test that is required by FMCSA regulations.
 - 4) An employer's report of actual knowledge of:
 - a) On-duty alcohol use as outlined in 49 CFR §382.205.
 - b) Pre-duty alcohol use as outlined in 49 CFR §382.207.
 - c) Alcohol use following an accident as outlined in 49 CFR §382.209.
 - d) Controlled substance use as outlined in 49 CFR §382.213.
- B. A substance professional's report of the successful completion of the return-to-duty process.
- C. A negative return-to-duty test.
- D. An employer's report of completion of the follow-up testing.

14.7 ASSISTANCE

- A. Brecke Mechanical recognizes that drug and alcohol abuse/addiction are treatable illnesses. We also recognize early detection, intervention, and support greatly improve the success of rehabilitation. To support a successful recovery, we provide a current list of qualified community professionals.
- B. Employees are responsible for the full cost accrued for drug and alcohol treatment. There is potential that some or all of the recommended treatment may be covered by your healthcare benefit selections, reach out to your benefit plan provider for more information.

14.8 TOBACCO USE

- A. This policy applies equally to all employees as well as to our customers and visitors.
- B. In keeping with Brecke Mechanical's intent to provide a safe healthy workplace, the use of ESDs is prohibited. Tobacco use in any form in/on any Brecke Mechanical premises is also strictly prohibited, except in the locations that have been specifically designated as tobacco use areas.
- C. All employees are responsible for following the Iowa Smokefree Air Act. Employees in violation of this policy shall be responsible for any fines accrued due to violation of the Iowa Smokefree Air Act.

14.9 EMPLOYER IMMUNITY

- A. A cause of action shall not arise against an employer who has established a drug and alcohol policy and has initiated a testing program in accordance with the drug and alcohol testing and policy safeguards provided for under this section, for any of the following:
 - 1) Testing or acting based on the results of a positive drug and/or alcohol screen/test result, indicating the presence of drugs and alcohol in good faith or on the refusal of an employee or a prospective employee to submit a drug and/or alcohol test.
 - 2) **Failure to:**
 - a) Normal drug and/or alcohol screen/test panel or for a specific controlled drug/substance.
 - b) Drug and/or alcohol screen/test for, if screened/tested for, or failure to detect, a specific controlled drug and/or controlled substance.
 - 3) Termination or suspension of any substance abuse prevention or drug and/or alcohol screening/testing program or policy.
 - 4) Any action taken related to a false negative drug and/or alcohol screen/test result.

14.10 DANGERS OF DRUG AND ALCOHOL USE

What are the effects of Alcohol and Drugs on the Body?

Drug Name	Substances Detection in Urine	What to look for & Physical Symptoms	Dangers
Amphetamines Uppers •Speed •Meth •Dexies •Crank •Black Beauties	Methamphetamine, Amphetamine	Tablets of varying colors, possible chain-smoking, long periods without rest or sleep. Loss of appetite, irritability, rapid speech, tremors, mood elevations	Disorientation, severe depression, paranoia, possible hallucinations, increase in blood pressure, fatigue
Cocaine •Coke •Crack •Flake •White Candy •Free Base •Toot •Blow	Benzoylcegonine	Glassine envelopes, razor, small spoons, odorless, bitter white crystalline powder, granular rocks, short-lived euphoria changing to depression, irritability, nervous, tightness of muscles	Shallow breathing, fever, anxiety, tremors, possible death from convulsions or respiratory arrest
Marijuana •Dope •Pot •Reefer •Joint •Grass •Blow	11-Nor-delta9-tetrahydrocannabinol-9-carboxylic acid, THC	Plastic baggies, rolling paper, 'roach' clips, odor of burnt rope. Altered perception, dilated pupils, lack of concentration and coordination, craving for sweets, increased appetite, laughter	Psychological dependence, increased heart rate, impaired short-term memory, anxiety, lung damage, possible psychosis with chronic use
Opiates • Heroin (smack, horse, junk) •Morphine ('M', Miss Emma) •Codeine (schoolboy)	Codeine, Morphine	Glassine Envelopes, needles and syringes, caps or spoons, tourniquets, needle marks on arms. Insensitivity to pain, euphoria, sedation, nausea, vomiting, itchiness, water eyes, running nose)	Lethargy, weight loss, hepatitis, slow and shallow breathing, possible death
Phencyclidine •Angel Dust •Devil Stick •PCP •Dummy Dust	Phencyclidine	Liquid Capsules. White or brown powder can be put on paper stamps, sugar cubes, cigarettes, or joints. May be injected. Increased pulse and heart rate, blood pressure and temperature. Mood and perception alteration possible, paranoia, panic, anxiety, nausea, tremors, suicidal urge	Unpredictable behavior, flashbacks, possible emotional instability and psychosis, hallucination
Barbiturates •Downers •Dolls •Reds •Tuinal •Rainbows •Yellows •Blues •Goof Balls	Secobarbital Phenobarbital Pentobarbital Butobarbital Amobarbital	Capsules of varying colors, longer periods of rest or sleep, dizziness, cold and clammy skin. Depression, decreased alertness and muscle control, intoxication and slurred speech, drowsiness	Rigidity and painful muscle contraction, emotional instability, possible overdoses, and death, especially when mixed with alcohol
Benzodiazepines Downers	Diazepam Chlordiazepoxide Oxazepam Nordiazepam Temazepam	Oral/Injection. Slurred speech, disorientation, drunken behavior without odor of alcohol	Shallow respiration, cold and clammy skin, dilated pupils, weak and rapid pulse, coma, possible death
Methadone • Done •Dolophine •Methadose	Methadone	Tablets. Liquid injection. Euphoria, drowsiness, respiratory depression, constricted pupils, nausea	Slow, shallow breathing, clammy skin, convulsions, coma, possible death
Methaqualone •Ludes •Quaaludes	Methaqualone	Tablets. Slow heart rate and breathing, lowered blood pressure. Sleepiness, feeling of well-being, loss of coordination, dizziness, impaired perception, confusion, later hangover	
MDMA •Ecstasy •Adam •XTC •MDA •MDE •X	Methylenedioxyamphetamine	Tablets. Euphoria, confusion, anxiety, sleeplessness, drug craving and paranoia. Used at all night RAVE dance parties	Muscle tension, teeth clenching, nausea, tremors, rapid eye movement, chills, possible death
Alcohol	Ethanol	Dulled mental processes, Lack of coordination, Odor of alcohol on breath, Pupils will be constricted, Sleepy condition, slowed reactions, slurred speech, Anxiety or jumpiness, Shakiness or trembling, sweating, nausea and vomiting, insomnia, Irritability, headache	Depression, anxiety, and suicide, Social problems, liver damage, Inflammation of the esophagus, Aggravation of peptic ulcers, Acute and chronic pancreatitis, Malabsorption of food nutrients that will lead to malnutrition, Heart attack, Hypertension, Stroke Immune system depression, Brain damage (dementia, blackouts, seizures, hallucinations, peripheral neuropathy).

RESOURCES FOR MORE INFORMATION OR ASSISTANCE:

- A list of facilities that provide assistance and SAP services can be found on the company drive.
- Alcohol and Drug Abuse: (800) 729-6686
- Cocaine Anonymous: (800) 347-8998
- Substance Abuse – Center for National Clearinghouse for NIDA's Treatment Hotline: (800) 662-HELP (800-662-4357)

www.drughelp.org www.doj.gov www.dea.gov www.health.org www.samsha.gov www.aa.org

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EMPLOYEE ACKNOWLEDGMENT

I, _____ understand the goal of the Safety Manual is to

(Please Print Clearly)

provide useful information about my job and what it means to work safely in my role with B.G. Brecke, Inc. I understand that while this Safety Manual contains general standards, it by no means describes all the policies and practices I am expected to comply with, and more detailed information is available from my supervisor(s), the Safety Team, or Human Resources.

I understand my employment is "At-Will", which means I can terminate the employment relationship at any time for any reason without advance notice. I understand that B.G. Brecke, Inc. can also terminate the employment relationship at any time for any reason, not prohibited by law. Therefore, except for the policy of at-will employment, Brecke Mechanical policies, practices, and procedures, including the Safety Manual, do not constitute a contract, expressed or implied. I should not interpret any verbal or written statement, policies, practices, and procedures, including this safety manual, as altering my at-will status.

I understand the information in the Safety Manual revised on (revision date of) supersedes that of any prior manual. If I have one of Brecke Mechanical's earlier publications, I can dispose of it immediately. The policies and procedures listed in this manual are the only ones that will apply moving forward. The Safety Manual is subject to amendments or cancellations at any time at the discretion of B.G. Brecke, Inc.

I acknowledge I have received a copy of the Safety Manual which includes the Drug and Alcohol policy and have been shown where it is housed electronically. I understand it is my responsibility to read and understand the contents of this manual. I have been provided the opportunity to ask my supervisor(s), the Safety Team, and/or Human Resources questions and receive answers.

I acknowledge I can reach out to my supervisor(s), the Safety Team, or Human Resources at any time if I have additional questions concerning the contents of this Safety Manual or employment with Brecke Mechanical. I acknowledge if I lose my copy of this Safety Manual I may request a new one from my supervisor(s), the Safety Team, Human Resources, or obtain a copy in the Training Vault, on the company drive, online in the Employee Resources folder, or on the [Safety Page](#) of B.G. Brecke, Inc.'s web page.

Employee's Signature: _____ Date: _____

Supervisor's Name (Please Print Name Clearly): _____

Supervisor's Signature: _____ Date: _____