

LEN-CO LUMBER

SAFETY POLICIES AND PROCEDURES MANUAL

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1. Each employee has a responsibility to notify their supervisor immediately of any unsafe condition noted in their work place.
2. Immediately report any/all workplace related injuries/illnesses to your supervisor.
3. Do not use damaged or unsafe equipment.
4. No employee should use any equipment or material for which he/she has not been trained for by their supervisor.
5. Employees must not attempt to repair, tamper with, or alter any equipment without prior approval from their supervisor.
6. Report frayed cords or worn plugs to your supervisor, and remove from service.
7. Always wear seatbelts when operating a vehicle (either company or personal) on company business.
8. Always utilize proper lifting techniques, manual lifting aids as provided, and lift with your **legs, not your back.**
9. Reporting to work while under the influence of illegal drugs or alcohol, or use of drugs or alcohol while at work, is grounds for immediate disciplinary action up to and including termination.
10. Smoking is prohibited anywhere within the gates of the lumber yard, as well as anywhere within any adjoining warehouses or showrooms.

PROCEDURES FOR LIFTING

Stooping

Stand close to the object, place feet about shoulder width apart, with one just ahead of the other, bend your hips and knees, lower your body keeping your back in good alignment, and bring your hands down to the object to be lifted.

Lifting

Grasp the object firmly and as close to the center as possible. Get set for the lift, which should be accomplished by pushing with the legs; straighten the ankles, knees, and hips to an upright position. Keep the load as close to the body as possible while lifting, and **DO NOT TWIST.** Change your direction if needed only by moving your feet.

Know where you are going with the lifted object before conducting the lift, and make sure that your pathway, and the location the object is to be placed are clear. If the object must be lowered, reverse the above and move with a fluid motion; do not make abrupt movements. If mechanical lifting aids are available, use them.

FAILURE TO FOLLOW THE PROPER WORKPLACE SAFETY PROCEDURES CAN MAKE THE WORKPLACE UNSAFE FOR OTHERS AS WELL AS YOURSELF. THEREFORE, WE WILL STRICTLY ENFORCE OUR POLICIES AND PROCEDURES TO ENSURE A SAFE WORKPLACE FOR ALL OUR EMPLOYEES. FAILURE TO COMPLY WITH ANY OF THESE POLICIES MAY RESULT IN DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.

I have read and understand my responsibilities under the Len-Co Lumber Safety Policies and Procedures Manual

Employee Signature

Date

EMERGENCY ACTION PLAN

FOR

Len-Co Lumber

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SCOPE AND APPLICATION

This written emergency action plan covers those designated actions our company will take to ensure employee safety from fire and other emergencies.

This program supports compliance with the Occupational Safety and Health Administration's Employee Emergency Plans as found in 29 CFR 1910.38.

PROGRAM ELEMENTS

The following elements will serve to outline our Emergency Action Plan:

1. Emergency escape procedures will be followed as stated.
2. No employee will remain in the facility during an emergency situation, but will instead evacuate the premises immediately.
3. During an emergency evacuation procedure, employees will gather together at pre-determined locations outside each of our facilities. Employees should remain there until instructed otherwise.
4. If employees or co-workers are in need of rescue or medical attention, appropriate outside authorities should be notified utilizing the 9-1-1 system on any accessible telephone.
5. All fires and other emergencies will be reported over the telephone using the 9-1-1 system.

ALARM SYSTEM

At our facility, we will utilize the facility paging system or vocal alarm to sound an alarm in the event of an emergency.

This procedure is in line with requirements for alarm systems, as defined in 29 CFR 1910.65(b) (5).

EVACUATION

Full and complete evacuation of facilities will occur in the event of any emergency circumstance warranting such actions. During an emergency, employees will be notified to evacuate by the manager on duty. Once evacuated, employees should gather outside the building at the designated evacuation location and await further instruction.

TRAINING

All employees will review this plan upon hire, or whenever a change in the plan is made.

HAZARD COMMUNICATION PROGRAM

I. General

The purpose of this instruction is to ensure that Len-Co Lumber is in compliance with the OSHA Hazard Communication Standard (HCS) 29 CFR 1910.1200.

The Location Safety Manager is the overall coordinator of the company safety program at their respective facility.

In general, each employee in the facility will be informed of the substance of the HCS, the hazardous properties of chemicals they work with, and measures to protect themselves from those hazards.

II. List of Hazardous Chemicals

The Location Safety Manager will maintain a list of all hazardous chemicals used in this facility and update the list as necessary. The hazardous chemical list will be updated upon receipt of hazardous chemicals at the facility.

III. Safety Data Sheets (SDS's)

The Location Safety Manager will maintain an SDS library on every substance on the list of hazardous chemicals used in daily operations at the facility.

The Location Safety Manager will review each SDS for accuracy and completeness, and will consult with Management or the Safety Consultant if additional research is necessary. All new procurements for the facility must be cleared by Management. Whenever possible, the least hazardous substance which meets the need will be used.

SDS's that meet the requirements of the HCS must be fully completed and received at the facility either prior to, or at the time of receipt of the first shipment of any potentially hazardous chemical purchased from a vendor. It may be necessary to discontinue procurement from vendors failing to provide approved SDS's in a timely manner.

IV. Labels and other Forms of Warning

The Location Safety Manager is designated to ensure that all hazardous chemicals in the facility are properly labeled. Labels should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer, or other responsible party. The Location Safety Manager will refer to the corresponding SDS to verify label information. Immediate use containers, small containers into which materials are poured for use on that shift by the employee drawing the material, do not require

labeling. To meet the labeling requirement of the HCS for other in-house containers, refer to the label supplied by the manufacturer. All labels for in-house containers will be approved by the Location Safety Manager prior to their use.

V. Training

Each employee who works with or is potentially exposed to hazardous chemicals will receive initial training on the HCS and the safe use of those hazardous chemicals. Additional training will be provided for employees whenever a new hazard is introduced into their work areas. Hazardous chemical training is the responsibility of the Location Safety Manager and will be conducted by the Location Safety Manager, or a qualified consultant.

The training will emphasize these elements:

A summary of the standard and this written program.

Hazardous chemical properties including visual appearance and odor, and methods that can be used to detect the presence or release of hazardous chemicals.

Physical and health hazards associated with potential exposure to workplace chemicals. How to read and understand the internationally accepted Pictograms, Signal Words, Hazard Statements and Precautionary Statements that provide the initial indication of the hazardous nature of a material.

Procedures to protect against hazards, e.g. personal protective equipment, work practices, and emergency procedures.

Hazardous chemical spill and leak procedures, and;

Where SDS's are located, how to understand their content, and how employees may obtain and use appropriate hazard information.

The Location Safety Manager will monitor and maintain records of employee training and advise the facility manager on training needs.

VI. Contractor Employees

The Location Safety Manager will advise outside contractors of any chemical hazards, which may be encountered in the normal course of their work on the premises.

VII. Non-Routine Tasks

Employees, when contemplating a non-routine task, will consult with the Location Safety Manager and will ensure that employees are informed of chemical hazards associated

with the performance of these tasks and appropriate protective measures. This will be accomplished by a meeting of supervisors and Management with affected employees before such work is begun.

VIII. Additional Information

Further information on this written program, the hazard communication standard, and applicable SDS's is available from Management.

HAZARDOUS ENERGY CONTROL PROGRAM (LOCKOUT/TAGOUT)

I. Purpose

The procedure establishes the minimum requirements for the lockout or tagout of energy isolating devices per 29 CFR 1910.147. It shall be used to ensure that the machines or equipment are isolated from all potentially hazardous energy, and locked-out or tagged-out before employees perform any servicing or maintenance activities where the unexpected energization, start-up, or release of stored energy could cause injury.

II. Responsibility

Appropriate employees shall be instructed in the safety significance of the lockout or tagout procedures. Each new or transferred affected employee and other employees whose work operations are or may be in the area, shall be instructed in the purpose and use of the lockout or tagout procedure.

III. Preparation for Lockout/Tagout

Conduct a survey to locate and identify all isolating devices to be certain which switch, valve, or other energy isolating device(s) apply to the equipment to be locked or tagged out. More than one energy source (electrical, mechanical or other) may be involved.

IV. Sequence of Lockout or Tagout Procedure

1. Notify all affected employees that a lockout or tagout system is going to be utilized and the reason therefore. The authorized employee shall know the type and magnitude of energy that the machine or equipment utilizes and shall understand the hazards thereof.
2. If the machine or equipment is operating, shut it down by the normal stopping procedures.
3. Operate the switch, valve, or other energy isolating device(s) so that the equipment is isolated from its energy source. Stored energy (springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure) must be dissipated or restrained by a method such as repositioning, blocking, bleeding down, etc.)

4. Lockout and/or tagout the energy isolating device(s) with assigned individual locks/tags.
5. To ensure that all energy sources have been de-activated, ensure that employees are not exposed, and then operate the push button or other normal operating controls to make certain the equipment will not operate. **CAUTION: *Return operating controls to neutral or off position after this test.***
6. The equipment is now locked/tagged out and work may proceed.

V. Restoring Machines or Equipment to Normal Production

1. After the servicing and/or maintenance work has been completed and equipment is ready for normal operation to resume, check the area around the machine/equipment to be certain that no one is exposed.
2. After all tools have been removed from the machine or equipment, guards have been re-installed and employees are now in the clear, check the machine controls once again to be certain that they remain in the neutral or power off position.
3. Remove all lockout/tagout devices from the energy isolating device(s) to restore energy to the equipment.
4. Power up the machine/equipment as you would for normal operations.

VI. Procedure Involving More Than One Person

In the preceding steps, if more than one person is required to lockout or tagout equipment, each shall place his/her own personal lockout device on the energy isolating device(s). When an energy isolating device cannot accept multiple locks or tags, a multiple lockout or tagout device (hasp) may be used. If lockout is used, a single lock may be used to lockout the machine or equipment with the key being placed in a lockout box or cabinet which allows the use of multiple locks to secure it. Each employee will then use his/her own lock to secure the box or cabinet. As each person no longer needs to maintain his or her lockout protection, that person shall remove his/her lock from the box or cabinet.

VII. Basic Rules for Using Lockout or Tagout System

All equipment shall be locked out or tagged out to protect against accidental or inadvertent operation when such operations could cause injury to personnel. **DO NOT ATTEMPT** to operate any switch, valve, or other energy-isolating device where it is locked or tagged out.

VIII. Training

1. All employees involved shall be trained in the correct implementation of this program and its elements and procedures.

IX. Periodic Inspection

1. At least annually, there will be an inspection and verification of these procedures and employee adherence to same.

PERSONAL PROTECTIVE EQUIPMENT POLICY AND HAZARD ASSESSMENT

I. General

The goal of this policy is to provide for the personal protection of employees engaged in work activities from the hazards associated with those activities. It is also the intent of this program to comply with the OSHA Standards 29 CFR 1910.132 and 1910.138 governing personal protective equipment for employees.

II. Hazard Assessment

Prior to determining what, if any personal protective equipment is to be used, the Location Safety Manager and/or Management shall have completed a hazard assessment to assess workplace hazards and determine what, if any, and what type of personal protective equipment would be appropriate to protect employees from such hazards. This policy will also cover proper selection of Personal Protective Equipment (PPE), fitting, and employee training in the proper use of such equipment.

III. PPE Selection and Inspection

Based upon the hazard assessment, appropriate PPE has been selected and provided for employees engaged in work activities requiring such protection. It is each employee's responsibility to routinely inspect his/her PPE for wear, damage, or other defect and notify immediate supervisor if such defect is found. Under no circumstances should an employee engage in work activities using damaged or defective PPE.

IV. Proper Use of Personal Protective Equipment

The company will train each employee in the selection, fit, inspection, and proper use and care of PPE required for his/her job activities. Each employee is required to maintain custody, take proper care of, and use such equipment as requested/required in the manner prescribed in all cases where its use is warranted or required. Misuse, alteration, improperly fitted or incorrectly worn equipment will not be allowed. It is the employee's responsibility to show up on the job ready for work with appropriate PPE.

V. Training

The company will provide initial training on all issued/required PPE, and/or other safety devices, when and where it is required, and provide periodic refreshers to review any changes to PPE requirements or safety device used, in compliance with the standard for PPE and any applicable specific standards.

LADDER SAFETY/FALL PROTECTION

LADDER SAFETY RULES

All ladders used on the job must be in good condition, and selected from the appropriate ladder classification for the job being done. Broken or damaged ladders may not be used. If any such defect is noted during routine inspection prior to placing the ladder into service, the ladder should be removed from service, and properly repaired or destroyed.

All straight ladders must be tied off at the top. Ladders must not be placed against movable objects. The base must be set back a safe distance (about 1/4 the working length of the ladder), and the top of the ladder, if used to access an elevated surface, must extend at least 3 feet beyond the landing.

Keep areas around the base and top of ladders free of tripping hazards, debris, cords, or loose materials. Face the ladder, at all times, during ascent/descent. Be sure shoes are free of mud, grease, or other substance which could cause slip/fall. Always maintain at least 3 points of contact with the ladder (two hands and a foot, two feet and a hand). Do not over-reach. Move the ladder if necessary.

Metal ladders must not be used for electrical work, or in areas where they could contact energized electrical wiring. In these areas, wooden ladders should be substituted. Stepladders must be fully open to permit the spreader to lock. You must not stand on the top two steps of a stepladder.

Fall Protection

The use of a man lift/aerial lift requires fall protection in the form of a body harness used in conjunction with anchor lines as a positional device, and tie offs such that the employee's position within the platform is maintained. If at any time it is determined that exiting of the protective platform becomes necessary, or other elevated work will be necessary requiring additional fall protection measures, such work will not proceed until full fall protection measures can be addressed. Such other fall protection measures may include full body harnesses with shock absorbing lanyard and properly anchored life line, safety lines/barriers, spotters, or combinations thereof. Fall protection for elevated work other than order pickers is required and would be determined on a job by job basis as encountered (if at all) during pre-job planning. Since these are not exposures which we would typically encounter, they are not addressed in detail within this policy manual.

ELECTRICAL SAFETY

1. All electrical wiring shall be installed and maintained by qualified personnel in accordance with the most recent publication of the National Electrical Code (NEC).
2. All electrical tools and equipment must either be grounded or double insulated and always connected to a grounded circuit and in specific situations where called for, protected by a Ground Fault Circuit Interrupter (GFCI).
3. Damaged or defective electrical tools/cords must be removed immediately from the work-site for repair or replacement.
4. Our employees are not authorized to work on high voltage energized lines. We are authorized to work on low voltage (below Xv) electrical only. If it becomes necessary to work on energized lines, prior approval must be obtained before work is begun, and only qualified electricians are to engage in such activity. Notify management prior to beginning work if this becomes necessary under any circumstance.

HAND AND PORTABLE POWER TOOLS/EQUIPMENT

1. Only company authorized tools and equipment will be used.
2. Hand and portable power tools will be inspected for wear and/or defect and if found defective will be removed from service until such time as they are repaired or disposed of.
3. Power tools will be used only with a properly grounded cord and/or receptacle, and in certain cases may need to be protected by GFCI.
4. Only three wire electrical extension cords, in good condition, are to be used. They must be rated for hard or extra-hard usage. They must be protected from damage at all times.

SAFETY INSPECTIONS

Periodic safety inspections will be conducted by the Location Safety Manager or their designee, both throughout the office areas, as well as the warehouse and dock areas. This section of the policy contains formats that may be used to conduct these inspections. Documented inspections will be conducted, and records of same maintained in file for a minimum of one year. Inspections should include identification of any noted deficiencies, suggested remedial actions, and follow up procedures to make certain that corrections have been made.

Len-Co Lumber
 Location Safety
 Inspection Record

Location: _____ Date: _____

Yes No Follow-up

A) Aisles, Floors, Hallways

- | | | | |
|---|-------|-------|-------|
| 1. Kept clean, dry, free of spills | _____ | _____ | _____ |
| 2. Floormats in good condition | _____ | _____ | _____ |
| 3. Carpets properly maintained | _____ | _____ | _____ |
| 4. Electric, phone cords minimized/properly covered | _____ | _____ | _____ |
| 5. Other | _____ | _____ | _____ |

B) Stairs:

- | | | | |
|--|-------|-------|-------|
| 1. Handrails provided | _____ | _____ | _____ |
| 2. Adequate stairway width, clearance height | _____ | _____ | _____ |
| 3. Emergency Lighting OK, working | _____ | _____ | _____ |
| 4. Tread covers in good condition | _____ | _____ | _____ |
| 5. Adequate housekeeping | _____ | _____ | _____ |
| 6. Other | _____ | _____ | _____ |

C) Egress:

- | | | | |
|--|-------|-------|-------|
| 1. Exits identified, illuminated and labeled | _____ | _____ | _____ |
| 2. Directional signs provided where needed | _____ | _____ | _____ |
| 3. Non-Exit doors identified/labeled | _____ | _____ | _____ |
| 4. All doors in exit paths free of obstacles | _____ | _____ | _____ |
| 5. Equipped with proper hardware | _____ | _____ | _____ |
| 6. Other | _____ | _____ | _____ |

D) Fire Protection:

- | | | | |
|---|-------|-------|-------|
| 1. Extinguishers mounted/charged, inspected/tagged | _____ | _____ | _____ |
| 2. Sprinkler system periodically inspected/tested | _____ | _____ | _____ |
| 3. Clearance of at least 18" below sprinkler heads | _____ | _____ | _____ |
| 4. Fire hoses inspected and continuously maintained | _____ | _____ | _____ |
| 5. Fire detection and alarm devices tested and maintained | _____ | _____ | _____ |
| 6. Flammables drums grounded, room door closed | _____ | _____ | _____ |
| 7. Other | _____ | _____ | _____ |

E) Employee Safety

- 1. Defective Equipment (ladders, tools, etc.) repaired or removed from service _____
- 2. Hazardous materials properly identified, inventoried, and stored _____
- 3. SDS File up to date, employee training records, Personal Protective Equipment _____
- 4. Machinery/Equipment guarding _____
- 5. Fall Protection In Use? _____
- 6. Dock Safety or Other _____

F) Emergency Evacuation

- 1. Staff properly trained _____
- 2. Written program provided to employees _____

G) Light/Power/Heat/HVAC

- 1. Exposed wires/frayed cords _____
- 2. Electrical equipment/tools properly grounded _____
- 3. Facility electrical equipment/panels accessible _____
- 4. HVAC equipment serviced by qualified contractor _____
- 5. Combustibles near boilers, furnaces, heating pipes _____
- 6. Other _____

H) Housekeeping:

- 1. Accumulation of rubbish in basement/alley/stairwell _____
- 2. Brooms and other cleaning equipment stored safely _____
- 3. Storage of combustibles done safety/clearances _____
- 4. Oily waste, paint rags, shop wastes in covered metal cans _____
- 5. Other _____

I) Maintenance/Work Shops:

- 1. Kept clean and orderly, secured against unauthorized access _____
- 2. Adequate room, uncongested _____
- 3. All combustible supplies stored safely _____
- 4. Waste material(s) removed daily _____
- 5. Equipment properly guarded _____
- 6. Personal Protective Equipment provided _____
- 7. Other _____

J) Personnel Observations:

- | | | | |
|---|-------|-------|-------|
| 1. Personnel wearing appropriate PPE for the task? | _____ | _____ | _____ |
| 2. Personnel using the appropriate tools for the job? | _____ | _____ | _____ |
| 3. Any work at height being performed? Safeguards? | _____ | _____ | _____ |
| 4. Work area clean, orderly, free from clutter? | _____ | _____ | _____ |
| 5. Safety Policy being observed? Lockout, task procedures? | _____ | _____ | _____ |
| 6. Machine guarding removed/tampered with/bypassed? | _____ | _____ | _____ |
| 7. Safe lifting, proper body mechanics, use of lift assists/aids? | _____ | _____ | _____ |
| 8. Other unsafe acts or behaviors observed/identified? | _____ | _____ | _____ |

Comments/Additional Corrective Measures:

FOR EMPLOYEES WHO OPERATE A VEHICLE ON COMPANY BUSINESS

This policy applies to all employees who regularly operate a vehicle on Company business and designated temporary replacements for employees who regularly operate a vehicle on Company business.

For the purposes of this policy, “regular” operation of a vehicle will be defined as weekly or more frequent operation of a vehicle.

I. REQUIREMENTS:

- A. All employees who operate a vehicle on Company business must:
 - 1. Maintain a satisfactory driving record.
 - 2. Satisfy all other terms of this policy.
 - 3. Meet any additional requirements as may be established by the Company or the insurance carrier.

II. DEFINITION OF SATISFACTORY DRIVING RECORD:

- A. An employee’s driving record will be considered satisfactory if the employee has had no more than two (2) convictions for moving violations of the State Motor Vehicle Law and/or chargeable traffic accidents during the most recent eighteen (18) month period, unless otherwise determined by the Company or the insurance carrier. An accident will be considered non-chargeable when:
 - 1. The employee’s auto is struck while legally parked.
 - 2. A judgment is obtained against the driver of another vehicle involved in an accident, and the Company is reimbursed by or on behalf of the person responsible for the accident.
 - 3. The operator of another vehicle involved in the accident is charged with a moving violation and the employee has not been convicted of a moving violation.
 - 4. The employee’s automobile is struck by another vehicle approaching from the rear and the employee is not convicted of a moving violation.
 - 5. An automobile operated by an employee is damaged by a “hit and run” driver, provided that the employee reports the accident to the proper authorities immediately.
 - 6. An accident involves damage by contact with animals or fowl.
 - 7. The employee’s automobile is damage by flying gravel, missiles, or falling objects.

An accident will be considered “chargeable” until a police report, accident report, and any other supporting evidence is received and reviewed by the Company to determine if the incident is non-chargeable.

An accident involving personal injury to an employee or a passenger while *NOT* using a seat belt/shoulder harness will be considered a “chargeable” accident regardless of contributing circumstances.

III. REINSTATEMENT TO OPERATE A VEHICLE ON COMPANY BUSINESS:

Any employee who is disqualified as a driver because of an unsatisfactory driving record may be reinstated when:

Time elapses until no more than two (2) convictions for moving violations and/or chargeable traffic accidents during the past eighteen (18) month period remain on the driving record; and

The employee has satisfactorily completed the Defensive Driving Course or an equivalent course since his disqualification; and

The employee has the approval of the responsible facility manager, Regional Sales Manager, or an organizational equivalent.

IV. SEAT BELT/SHOULDER HARNESS:

- A. All drivers who operate a vehicle on Company business must use a seat belt/shoulder harness at all times. It is the driver’s responsibility to encourage all passengers to use a seat belt/shoulder harness.
- B. All employees shall follow newly adopted NYS Law regarding cell phone usage. Cell phones shall be used only with hands-free devices and only when safe to do so.

V. DEFENSIVE DRIVING COURSE:

- A. Any employee who regularly operates a vehicle on Company business may be required to satisfactorily complete the National Safety Council Defensive Driving Course, or its equivalent as approved by the Company, within six (6) months of the time the employee begins the job assignment.

VI. MOTOR VEHICLE ACCIDENTS:

- A. Any employee who has an accident while driving a Company vehicle or while operating a personal vehicle on Company business must report the accident on the Automobile Accident Report, or a comparable form, to his/her immediate supervisor AND the insurance company within twenty-four (24) hours. This includes all types of claims, no matter what the dollar value, including comprehensive claims, i.e., theft, glass breakage, etc.
- B. An employee must also forward a report of the local police investigation of the accident along with the employee’s accident report and any other evidence in order to us to review the accident to determine if the accident is non-chargeable.

VII. COMPANY OWNED OR LEASED VEHICLES:

- A. All Company owned or leased vehicles shall be maintained in a safe and reliable condition.
- B. Only employees are authorized to operate a Company vehicle. An employee's spouse and children over twenty-one (21) years old are permitted to drive the vehicle only in emergencies.

SAFETY TRAINING

Len-Co Lumber will provide specific training as required under this policy as well as the specific provisions of the applicable standards referenced within this policy.

Records will be maintained by Management at each site on all such training, the dates and content of same, and the names/titles of attendees.

Refresher training and updates to such programs will be provided upon addition or change to existing exposures, changes to the standards applicable to our operation, or when such training is deemed necessary and appropriate by Management to protect the well being and health of our employees.

WORKPLACE VIOLENCE PREVENTION POLICY

It is Len-Co Lumber policy to provide the safest possible workplace for its employees. It is with this goal in mind that the following policies are outlined with respect to workplace security and employee behavior.

No employee will report to work carrying or in possession of weapons including but not limited to firearms, knives, or any other weapons. Weapons on premises or brought to the work site will not be allowed or tolerated and will be grounds for immediate disciplinary action up to and including termination. If special circumstances exist for any employee regarding this policy, that employee is required to discuss their needs with management and gain management approval and meet all requirements of such conditional approval prior to bringing such items to the workplace.

HARASSMENT POLICY

Our company simply will not tolerate harassment, be it physical, sexual, or verbal or any other behavior which constitutes harassment of any type. We **require** any employee who is aware of harassment occurring in our workplace, or who feels they have been a victim of harassment, sexual or otherwise, to report it. *Any* employee who is guilty of harassment will be disciplined, and likely discharged.

If you believe you have been harassed, or if you witness sexual or other harassment, you should report it to management. If there is some reason you cannot report it to your immediate supervisor, then you may report it to the President of the company or other senior management person.

If you are in doubt as to whether an action or occurrence is harassment, or sexual harassment, **report it**. It is better to report a situation and have it cleared up than to let it go because you do not think it is serious enough to report.

Your report will be acted upon in an appropriate and timely fashion, and **any** person found guilty of harassment will be disciplined and likely discharged.

Powered Industrial Truck Safety Program

1.0 Introduction

Various codes and standards govern powered industrial truck (PIT) safety. This document is based on those codes and standards set for PITs used for **Len-Co Lumber** activities. It contains requirements for PITs with electric motors or internal combustion engines and non-powered manually operated lifts, as these have similar hazards and operating rules. Powered industrial truck(s) is defined as a mobile, power-driven vehicle used to carry, push, pull, lift, stack, or tier material. (Note that for purposes of this document, the terms "powered industrial truck(s)" and PITs are used interchangeably.)

All workers must comply with the requirements set forth in this document. Any deviation from these requirements will require approval by the appropriate management chain.

2.0 Hazards

The following conditions can result in hazards from PIT operation:

- Mass-gravity responses to vehicle or load instability can cause material damage or personal injury up to and including death.
- Unapproved operation of an internal combustion engine vehicle indoors can cause asphyxiation or toxic exhaust gas exposure to personnel, leading to illness up to and including death.
- Unapproved environment or the use of inadequate controls for operations or maintenance activities can cause a fire or explosion, leading to material and facility damage or personnel injury up to and including death. In this case, a fire or explosion can result from the fuel source of the vehicle or the vehicle's engine or motor.

3.0 Controls for Safe Use of PITs

Powered industrial trucks are divided into several classes. This section provides requirements and best management practices for the various types of PITs used at **Len-Co Lumber**. When in doubt, default to the manufacturer's instructions for more detailed guidance.

3.1 General

All operators shall be licensed to operate PITs.

Len-Co Lumber no longer separates PIT operators into categories (incidental or professional). Operators are qualified to lift loads to the rated capacity of the equipment

for which they are trained and evaluated. All lifts shall be made safely and in accordance with accepted work practices. Directorates may impose additional capacity restrictions on their operators as necessary.

3.2 Mandatory Equipment

The use of safety and protective devices is an important factor in safe design and operation of PITs. The design of all PITs shall comply with the appropriate American National Standards Institute (ANSI) B56 series standard.

PITs need not be equipped alike; however, there are certain items found on all PITs:

- Nameplate(s) and markings (e.g. Capacity information; Limitations)
- Warning devices (e.g., Lights or blinkers, sound-producing devices, motion alarms)
- Overhead guards (required when a falling-object hazard exists for the operator)
- On-board, sealed fire extinguishers (10 ABC/BC) for PITs authorized to transport explosives or used in areas where there are explosives.

3.4 Pre-operational Inspection

At the start of each work shift during which the unit will be used, the operator on each work shift shall conduct a pre-operational visual inspection of the equipment. If a second operator wants to use a PIT but cannot verify that this inspection has been done, he/she shall complete the inspection prior to using the PIT. If any malfunctions or defects are found during the inspection, the PIT shall be parked (with the keys removed) and the manager on duty should be contacted for assistance.

3.5 Rules for Operators

The requirements below apply to all PIT operators.

- Use seat belts where provided.
- Operate internal combustion engine PITs only in designated areas with adequate ventilation.
- Do not exceed the floor load rating. (Remember that the total weight of the PIT equals the PIT's plus the load and any attachments.)
- Secure (tie down) unstable loads before starting the vehicle.
- Keep arms and legs inside the PIT structure, except when signaling for turns or stops.
- Do not jump from a moving PIT.
- Make sure that there is adequate clearance before passing under or between structures
- Yield to pedestrians.
- Do not carry passengers, except where **manufacturer-approved** seats are provided.
- Tilt the mast back before traveling
- Stay at least three vehicle lengths back when following another PIT.

- Maintain forks about 4 to 6 in. (10-15 cm) off the driving surface when traveling.
- Do not attach slings, cables, or chains to the forks to lift materials or objects from underneath them.
- When forward vision is obscured, drive in reverse.
- Observe all traffic signals.
- Solid tire PITs should be used indoors only. Solid tire PITs are not designed to operate on irregular surfaces or rough roads
- Never add a counterweight. Know the weight of the load being lifted.
- Never exceed the PIT's rated capacity.
- Do not lift material or equipment with which you are unfamiliar.
- Maintain at least a 10-ft (3 m) separation from overhead power lines.
- When crossing rails or other irregular areas, slow down and approach on a diagonal.

3.6 Parking

The requirements below apply when parking PITs.

- Park on level surfaces.
- Lower the forks to the ground.
- Tilt the mast forward.
- Set the parking brake.
- Place the controls in the neutral position.
- Turn off the engine.
- Chock the wheels if the PIT must be parked on a slope.
- Do not leave an unattended PIT running. A PIT is considered unattended if the operator is out of sight of the PIT or more than 25-ft (8 m) away.

3.7 Special Conditions

3.7.1 Loading Docks and Trailers

When operating a PIT on a loading dock or in a trailer, the operator shall

- Secure all dock plates.
- Ensure that the total weight of the equipment, attachments, and load do not exceed the floor weight capacity of the trailer. Also make sure that the trailer floor is in good condition and is able to support the load.
- Ensure trailer wheels are chocked or dock clamps are in place before driving onto or into a truck trailer.
- Ensure that trailers not attached to tractors have trailer-jacks in place.
- Drive the PIT slowly on wet and slippery docks.
- Slow down and sound your horn when proceeding through doorways.

3.7.2 Ramps

When operating a PIT on ramps, the operator shall

- Point the forks up the ramp when carrying a load, regardless of the direction of travel.
- Drive unloaded PITs with the forks pointing downhill for added stability.
- Obtain help to guide you when going up a ramp with a load and your vision is blocked.
- Never turn a PIT sideways on a ramp.

Exception: When operating a motorized hand truck, always ensure that the load-engaging means are facing downslope (loaded or empty).

3.7.3 Refueling and Recharging Batteries

Refueling. The following requirements apply when refueling PITs:

- Gasoline, diesel, and propane PITs shall only be refueled outdoors.
- Propane bottles shall be filled only by Fleet Management personnel or others authorized and trained by Fleet Management.
- The valve on the propane bottle shall be closed while the PIT's engine is running to consume all gas in the line.
- Liquid propane bottles shall be transported only in vehicles designated for this purpose and shall be properly secured during transport. *They shall not be transported in closed vehicles.*

Recharging Batteries. Recharge electric PIT batteries only in designated, posted, and well-ventilated areas. Do not smoke or conduct spark-producing operations near batteries being charged. Wear the appropriate PPE (e.g., aprons, goggles or face shields, and rubber gloves) when servicing batteries.

3.7.4 Indoor Operations

Following are the requirements for PITs operated indoors:

- Ensure that there is adequate ventilation for PITs powered by internal-combustion engines. Contact your area ES&H Team for an analysis of oxygen deficiency, carbon monoxide, and other contaminants in the atmosphere.
- Sound the horn when approaching intersections, pedestrians, doors, or corners. Slow down and sound the horn anywhere vision is blocked or impaired.

Electric PITs are preferred for indoor operations and required when working in confined spaces.

3.7.5 Pedestrian Areas

Pedestrians working near PIT operations should keep a safe distance from the operating equipment. This means staying clear of the PIT's turning radius and making sure that the PIT operator knows where you are at all times.

The PIT operator shall

- Yield the right-of-way to pedestrians.
- Prevent anyone from walking or standing under elevated forks.
- Slow down and sound the horn as a warning when approaching personnel.

3.7.6 Narrow-Aisle Equipment

Narrow-aisle equipment (e.g., rider-reach PITs, stock pickers, and stand-up counterbalanced PITs) may present unique safety hazards. This type of equipment is designed for specialized jobs and specific work environments. For example, there may be a need for a narrow-aisle stock picker in a warehouse for high-reaching racks. Fall protection devices and other PPE may be required while operating narrow-aisle equipment. Before purchasing this type of equipment, contact the area ES&H Team for an evaluation of the equipment and work area.

3.7.7 Road Use of PITs

PITs present special hazards when operated on roadways. Therefore, the following requirements apply:

- Only PITs recommended by the manufacturer shall be used on roadways. Hard-rubber tire PITs or "warehouse PITs" should not be used on roadways. If hard tire PITs require refueling, repair or maintenance at other locations that necessitate travel on roadways or irregular surfaces, extreme care shall be used. The Responsible Individual shall make an assessment of this activity for the safety hazards associated with travel on these surfaces. An Integration Work Sheet can be used for this purpose.
- PITs shall not carry loads that are wider than the widest dimension of the PIT or attachment being used.
- PITs being driven to a refueling point shall not carry loads.
- All loads shall be properly secured on the PIT prior to operation on roadways to prevent inadvertent load shifting, slippage, or dropping. The Responsible Individual shall determine proper methods of securing loads after all safety concerns have been addressed.
- PIT operators shall pay particular attention to motor vehicles and pedestrians while operating on passageways.
- PIT operators shall move to the right lane when traveling on roads to allow passing vehicles adequate clearance. Pull over and stop when necessary.

Note: When oversized loads are to be carried on roadways, the Responsible Individual shall determine the proper method of transport. PITs should only be used if safer methods (i.e. trailers, trucks, etc.) are not available. If trailers or trucks are not available for transport, and PITs are to be used, safeguards shall be implemented (i.e. observers, road guards, traffic escort, etc.) to ensure PIT operator and other vehicle operator safety.

3.8 Testing, Maintenance, and Modification

Only trained and authorized personnel shall maintain and inspect PITs. All work shall be done in accordance with the manufacturer's and **Len-Co Lumber's** specifications. Because PITs are used daily, it is particularly important to follow maintenance, lubrication, and inspection schedules. Special attention should be given to PIT control,

safety, and lifting features such as brakes, steering, lift overload devices, safety equipment, and tilt/lift mechanism.

3.8.1 Testing and Maintenance

The testing and maintenance requirements for PITs shall be done according to the manufacturer's instructions

3.8.2 Modification

Modifications or additions to PITs that affect their capacity or safe operation shall not be made without prior written approval from the manufacturer. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed accordingly.

3.9 Nonpowered Trucks/Lifts

Operators are not required to have a license to operate nonpowered trucks/lifts (e.g., pallet jacks, etc.). Work supervisors shall, however, only allow trained personnel to operate these units. At the start of each work shift during which the unit will be used, the operator shall conduct a pre-operational visual inspection. If any malfunctions or defects are found during this inspection, the truck shall be parked and the manager on duty shall be contacted.

Special lifting attachments approved by the truck manufacturer may be used on these units. The truck manufacturer's capacity plate shall be modified or a second plate added describing the attachment and any related capacity modifications.

3.10 Qualification and Training

A key element of operator certification is the education and training received. To become a PIT operator, candidates must successfully complete three phases of training: formal instruction, practical application (hands-on training), and a performance evaluation.

3.10.1 Formal Instruction

The candidate shall

- Complete Course "Powered Industrial Truck (PIT) Safety."
- Successfully satisfy the requirements listed on the PIT instructor's checklist.

3.10.2 Practical Application (Hands-on training)

Candidates shall successfully complete practical application (hands-on) training for equipment they operate in the workplace. The PIT proficiency instructor shall administer this instruction according to established training guidelines.

The organization authorizing the use of PITs is responsible for coordinating hands-on training with the appropriate PIT proficiency instructor. The length of this training varies, depending upon the level of skill, knowledge, and experience of the candidate.

3.10.3 Performance Evaluation

Upon successful completion of formal and hands-on training, the candidate is eligible for a performance evaluation by the PIT proficiency instructor. This evaluation determines how safely the candidate operates PITs in the workplace.

PIT Related Topics that will be Covered

- Operating instructions, warnings, and precautions for the types of PIT the operator will be authorized to operate.
- Differences between the PIT and the automobile.
- PIT controls and instrumentation (i.e., where they are located, what they do, and how they work).
- Engine or motor operation.
- Steering and maneuvering.
- Visibility (including restrictions due to loading).
- Fork and attachment adaptation, operation, and use limitations.
- Vehicle capacity.
- Vehicle stability.
- Any vehicle inspection and maintenance that the operator will be required to perform.
- Refueling, charging, and recharging of batteries.
- Operating limitations.
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the type(s) of vehicle that the employee is being trained to operate.

Workplace-related Topics

- Surface conditions where the vehicle will be operated.
- Composition of loads to be carried and load stability.
- Load manipulation, stacking, and unstacking.
- Pedestrian traffic in areas where the vehicle will be operated.
- Narrow aisles and other restricted places where the vehicle will be operated.
- Ramps and other sloped surfaces that could affect the vehicle's stability.
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust.
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

3.10.4 Requalification

To requalify for a PIT license, operators shall

- Have a performance evaluation conducted by a designated PIT proficiency instructor.

A record of training and skill evaluations shall be kept on file and made available upon request. **Len-Co Lumber** will maintain and archive training records in accordance with the **Len-Co Lumber** Training Program Manual and the **Len-Co Lumber** records retention schedule.

3.10.5 Refresher Training

Refresher training in relevant topics shall be provided to the operator when

- The operator has been observed to operate the PIT in an unsafe manner.
- The operator has been involved in an accident or near-miss incident.

- The operator has received an evaluation indicating that he/she is not operating the PIT safely.
- The operator is assigned to drive a different type of PIT.
- A condition in the workplace changes in a manner that could affect the safe operation of the PIT.

4.0 Responsibilities

4.1 Operators

- Take Course
- Receive hands-on training and a performance evaluation from a qualified PIT proficiency instructor.
- Safely operate PITs.
- Conduct daily pre-operational visual inspections.
- Notify your work supervisor if you are unfamiliar with or believe a load is not safe to lift, or if you believe an environment is not safe to enter.
- Inform your work supervisor of any safety-related problems involving PITs or operations.

4.2 Hazards Control Department

- Analyze accidents involving PITs, as appropriate.
- Determine hazard classifications of areas where PITs are used.
- Select and approve designations for PITs used indoors or in hazardous areas.
- Maintain training records of operator training.

4.3 Work Supervisors

- Select operators based on their experience and physical qualification.
- Assure that personnel under your supervision take the required training courses.
- Ensure that a designated PIT proficiency instructor provides practical application training and performance evaluations to applicants.
- Monitor the performance of PIT operators to ensure they comply with safety rules.
- Ensure that unauthorized persons do not operate PITs under your control.
- Monitor daily shift pre-operational visual inspections.
- Ensure that PITs are equipped with all applicable safety equipment (e.g., flashing lights and/or audible alarms) as required by the operating environment.
- Ensure that PITs are not operated if they are out of compliance with the applicable maintenance schedule.