

Metal Locking Service Inc.

216 Colgate Avenue Buffalo, NY 14220
Phone (716) 824-4359 Fax (716) 824-0903

SAFETY PROGRAM

POLICY STATEMENT ON SAFETY AND HEALTH

The safety of all employees of Metal Locking Service Inc. is of primary importance. The prevention of work-related injuries shall be given precedence over operating productivity. Safety shall be practiced by all personnel at all times. Only safe methods and equipment shall be used.

Recognizing that the responsibilities for safety must be shared by all, we establish the following:

Metal Locking Service Inc. accepts responsibility for enacting, maintaining and improving our company's safety and health standards and expects full cooperation toward the prevention of occupational (job related) accidents, injuries and/or illness.

Crystal Newman is hereby designated as the Metal Locking Service Inc. safety coordinator and is responsible to Matthew Gehman, on all matters relating to safety and health.

The Safety Coordinator will be responsible for developing the proper attitudes toward safety and health in all employees and for insuring that all operations are performed with the utmost regard for safety of all.

Each employee is responsible for wholehearted cooperation with all aspects of safety and health, including compliance with all rules and regulations and for continuously practicing safety while performing his or her duties.

Metal Locking Service Inc. safety standards include:

- * Compliance with all applicable safety laws, rules and regulations.
- * Regular safety meetings to provide education and training.
- * Regular safety inspections to identify and eliminate unsafe working conditions and practices.
- * Prompt and thorough investigation of every accident to determine what caused it and to correct the problem so that it will not happen again.

The Metal Locking Service Inc. safety and health program is designed to reduce the number of injuries to a minimum. Our goal is zero accidents, injuries and illnesses.

General Manager

Signature

President

Signature

Safety Coordinator

Signature

COMPANY SAFETY PROGRAM

1. Each supervisory personnel is to be advised of the requirements that must be met and maintained at all time.
2. Each employee is issued the attached general policy to his commencing work and will be asked to read and acknowledge his/her willingness to comply with our safety policy.
3. "Tool Box" safety meetings will be held at least one (1) time each month for all employees. The "Tool Box" meetings will be recorded indicating topic and names of those in attendance.
4. Refusal to follow safety rules and regulations can be cause for dismissal, based on our standard disciplinary procedures.

POLICY

- A. Safety is recognized as a major area of concern requiring constant vigilance and cooperation in preventing disabling injuries and accidents by all supervisory personnel.
- B. The primary objective of accident prevention is the physical well being of the employee by protecting him/her from injury or death. In addition, accidents to employees on the job and vehicle and equipment accidents involving property damage contribute to time consuming interruptions to work progress and are very costly.
- C. Each employee must remain constantly alert to the possibility of accidents and exert effort to minimize such possibility by detecting and eliminating job hazards.
- D. Safety consciousness must be induced and consistently maintained on each job. Management will assist supervisory personnel in controlling accident exposures. However, the responsibility for actually preventing job accidents and injuries rests upon each (senior) lead men. It must follow that each employee will be expected to play a definite active and sustained part in this program. Good accident prevention results are expected.
- E. This Accident Prevention Program will be a continuing policy of management who will review its effectiveness periodically with all supervisors; however, this shall not be construed as an alternative for a supervisor to exercise good judgment.

POLICY CONT....

F. If the nature of the injury requires an ambulance, the following procedure will be followed:

(1) One of the senior lead men/lead men will request an ambulance be sent to the project site.

(2) One of the (senior) lead men will immediately notify the company of the accident.

G. Emergency telephone number list **MUST** be included in the safety plan and posted at the jobsite. Every workman on the job must know where this list is.

GENERAL SAFETY RULES

1. All persons must wear safety glasses with side shields at all times.
2. All persons must wear steel-toed shoes - no sneakers or sandals -all leather.
3. All persons must wear long pants - no shorts or cut-offs.
4. All persons must wear at least a T-shirt at all times to prevent sunburn.
Long sleeve shirts are required when working with “hot” materials.
5. Wear goggles when using power tools and other designated machinery; and face shields when using grinders, etc.
6. Hearing protection should be worn when exposed to high level noise.
7. Hard hats shall be worn when exposed to overhead hazards.
8. Protect your hands - wear gloves when necessary, avoid pinch points, sharp edges, hot materials, etc.
9. Lift properly - bend your legs - not your back. Get help if the load is too great.
Be sure you have a firm hold and a clear pathway.
10. Watch your step - falls can kill. Be especially careful near roof edges, skylights, and when working on steep roofs. Wear a safety belt and lifeline when necessary. Use warning lines and barricades as appropriate.
11. Specialized training will be provided to employees as needed.
12. If injured, report it immediately to your foreman/supervisor and get first aid.
13. Obey all warning signs and safety rules. They are for your protection.
14. All employees will comply with our Customer’s Safety Rules and Regulations when working at that particular plant.
15. Apparatus, tools and machinery shall not be repaired or adjusted while in operation, nor shall oiling of moving parts be attempted.
16. Boots are to be tied at all times.
17. Shirts are to be tucked in to avoid injury.

JOB CONTROL

SHOP:

The General Manager (Shop Foreman), and all Project Managers, as well as shop employees, in accordance with their union contract will see that all shop machinery is used in a safe manner and that all personnel operating shop machinery is used in a safe manner and that all personnel operating shop equipment have had adequate training in the operation of this equipment.

JOB SITE:

Each job site senior lead man or lead man on each project will be assigned the responsibility for coordination of his/her job program with the overall company program. He/She will determine that safe practices and conditions are observed throughout the job, that lead men do not require or permit their men/women to take unnecessary chances but rather are giving them proper instructions, including safety. He/She will also see that proper arrangements are made for the care of the injured, review all accident reports and take necessary corrective action where indicated.

SAFETY STANDARDS

The safety standards herein established will be made known to all employees on each job. These standards are:

HOUSEKEEPING - Good housekeeping is the first rule of accident prevention in construction and should be a primary concern of all senior lead men and lead men. Good housekeeping should be planned at the beginning of the job, carefully supervised and followed to the final clean-up.

1. Provide adequate and proper storage place for tools so they will not be needlessly scattered around. All electric power tools will have necessary guards in place and will be properly grounded. All welding and cutting tools will be provided in good condition. All scaffolds and ladders will be inspected for structural stability and used in accordance with O.S.H.A. standards.
2. See that material (in storage area, in transit or at the working area) is piled or stacked properly so it cannot fall.
3. See that working area is well lighted.
4. Provide safe and sufficient containers for rubbish and waste and place them so they can be used easily.
5. Designate one "dumping area" for worn out parts and obsolete equipment
6. Prevent unnecessary accumulation of dirt, refuse paper, and obsolete equipment.
7. Provide safe storage of oxygen and acetylene tanks; never allow tanks to lay in dirt or mud, maintain them upright at all times and replace caps when not in use.
8. Fire Prevention and Protection - "No Smoking" signs will be posted and complied with; flammable liquids will be stored in approved containers; fire extinguishers of proper size and type will be provided when needed.
9. Drinking water will be from an approved source and toilet facilities will be provided and kept in a sanitary condition.

PROPER WORK CLOTHING

- A. Proper work clothing plays an important part in a safety program. Much research has gone into the development of clothing that provides not only protection but reasonable comfort as well.
- B. Safety shoes are required by all Metal Locking Service Inc. employees - they are no more expensive than a pair of good working shoes. Shoes must be kept in good repair. Slipping accidents are most likely to occur when shoe heels are worn; nails and other sharp objects will easily penetrate a sole that has been worn thin. Workers are not allowed to wear slip-on sandals, sneakers or shoes that have been split or have had holes cut in them. Boot allowance is made available on a yearly basis.

All employees should procure and wear proper work clothing and safety shoes for their own well-being and safety. Uniforms are provided by the company and are expected to be worn.

PERSONAL PROTECTIVE EQUIPMENT

The following protective equipment will be issued to those employees who are exposed to the hazards indicated and its use must be consistently enforced by the senior lead men. Employees will be responsible for the careful use of such equipment issued to them and the return thereof when use is completed; employees failing to turn in issued equipment will be responsible for the cost of such items.

- A. Hard Hats - Employees will wear hard hats when exposed to overhead hazards.
- B. Safety Glasses - At all times while in the shop, designated by signs.
- C. Face Shield - To be worn while grinding with the belt sander, the pedestal, pneumatic, and electric grinders. Welders must wear welding helmets.
- D. Gloves - To be used when exposed to sustained heat and sparks, acids, corrosives, electrical exposure.
- E. Respirators - To be used under severe conditions of dust, fumes, gases, and oxygen deficiency.

- F. Safety Belts and Lanyards - To be worn when working at elevated heights, in confined spaces, and other similar conditions.

FIRST AID & MEDICAL

- A. Provide a first aid kit for treatment of minor injuries in each job office.
Unitized kits are recommended for construction projects and are available in various sizes depending on the number of employees. Keep supplies replenished.
- B. Whenever possible, arrange to have at least one man take first aid training.
- C. Serious or emergency cases will be taken to the emergency facilities.

The following actions will not be tolerated by this company and are grounds for immediate dismissal:

1. Consumption of alcoholic beverages or use of illegal drugs during working hours.
2. Reporting for work while under the influence of alcoholic beverages or illegal drugs.
3. Horseplay or fighting during working hours.
4. Possession of firearms or weapons during working hours.

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I acknowledge that I have received a copy of the company safety rules,
and I will make every effort to abide by the same.

Name (please print)

Signature

Date

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ALCOHOL & DRUG USE POLICY

ALCOHOL AND DRUG USE POLICY

It is the policy of Metal Locking Service Inc. that the unauthorized use, possession, distribution, sale or being “under the influence” of alcohol or drugs on Company job sites, warehouse, shop, offices, parking lots or Company vehicles is strictly prohibited and may be cause for disciplinary action up to and including termination.

With these objectives in mind, the Company has established the following guidelines with regard to unauthorized use, possession, distribution, sale or being “under the influence”.

“Under the influence” is defined as, the employee is affected by alcohol or other drugs or the combination in any detectable manner. The detectable manner includes: impairment of physical or mental ability (e.g. slurred speech or difficulty in maintaining balance), professional opinion, a scientifically valid test or a supervisor’s observation.

Use of Alcohol

No employee will report to work while “under the influence” of alcohol. The use, sale, purchase, transfer or possession of any amount of alcohol by an employee at any time during working hours (including the time provided for lunch and breaks) at a job site, at the Company office, warehouse, shop, parking lots, or in any Company provided vehicle is prohibited.

Exception: The use of alcohol in moderation at a Company sponsored function where the consumption of alcohol has been authorized or its storage in a container with an unbroken seal in the employee’s personal vehicle parked on Company property is not prohibited.

Exception: Employees may use alcohol in moderation at conferences or conventions when alcohol is being served. Nevertheless, Metal Locking Service Inc. does not encourage the use of alcohol and such use must be limited so that it does not affect the employee’s safety, the safety of co-workers, members of the public or the employee’s job performance.

Use of Legal Drugs

A “legal drug” is a prescribed or over-the-counter drug which has been legally obtained and is being used for the purposes for which it was prescribed or manufactured.

Being “under the influence” of any legally obtained drug by any employee while performing Company business or while at a Company facility including: parking lots, job sites, or in any Company provided vehicle is prohibited to the extent that such use or influence may affect the employee’s safety, the safety of co-workers or members of the public or the employee’s job performance.

ALCOHOL AND DRUG USE POLICY CONT.....

Prior to commencing work, employees taking drugs prescribed by an attending physician must advise their supervisor of the possible effects of such medication regarding their job performance and physical/mental capabilities for the safety of the workforce and in no way punitive actions. Upon receiving the notification from the employee, the supervisor will take one of the following actions, depending on the severity of the employee's reaction to drugs:

1. Place the employee in restricted job.
2. Give the employee altered responsibilities.
3. Consult with the prescribing physician to determine if the employee should be placed on an alternate drug or dosage.
4. Approve the employee to perform his/her regular job duties.
5. Temporarily layoff the employee.

Use of Illegal Drugs

An "illegal drug" is any drug which cannot be legally obtained (e.g., marijuana, narcotics, hallucinogens, etc.), or which although legal has been illegally obtained, or prescribed drugs not being used for prescribed purposes or used in larger doses than recommended. No employee will report to work while under the influence of illegal drugs. The use, sale, purchase, transfer or possession in any amount of illegal drugs by an employee at any time during working hours (including the time provided for lunch and breaks) at a job site, at any Company facility including parking lots, while on Company business or in a Company provided vehicle is prohibited.

Disciplinary Action

Possession, sale, distribution or witnessed use of alcohol or illegal drugs will result in an immediate suspension with the possibility of termination of employment, following an investigation.

Employees who appear to be "Under the influence" of alcohol and/or drugs, will be subject to immediate suspension and will be requested to submit to a health examination which may include a blood test, urinalysis, or other drug or alcohol test. Refusal by the employee to comply with the request will result in an immediate termination of employment.

Employees who appear to be "under the influence" of alcohol or drugs, who agree to voluntarily submit to the appropriate test will be treated in the following manner.

1. A negative test conclusion will result in the employee being immediately returned to work with payment of any loss of normal wages or benefit suffered during the period of suspension from work.
2. A positive confirmed test will result in a thirty (30) day suspension from work and the employee will be referred to a health care institution for a chemical dependency assessment. The employee is responsible for the cost of the health care institution and/or treatment. The employee will be required to follow the

appropriate plan of corrective action recommended by the institution.
Reinstatement will be contingent upon successful rehabilitation for chemical dependency or strict post evaluation.

3. Employees testing positive for a second time in a twelve (12) month period will be subject to immediate termination of employment.

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EMPLOYEE ACKNOWLEDGMENT OF METAL LOCKING SERVICE INC. ALCOHOL AND DRUG USE POLICY

I, _____, hereby acknowledge that my employer has given me a copy of the Company's Alcohol and Drug Use Policy, and I have read and understand the objectives of the policy. I also understand that the intent of this policy is to maintain a safe, healthful and efficient working environment for all of the Company's employees to protect Company property, equipment and operations.

Employee

Date

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HAZARDOUS COMMUNICATIONS STANDARD WRITTEN PROGRAM

PREFACE

This document fulfills the requirement of Paragraph (e) of the Federal OSHA Hazard Communication Standard (29 CFR 1910.1200) for Metal Locking Service Inc., 216 Colgate Avenue, Buffalo, New York. This document will be made available, upon request, to employees, their designated representatives, the Assistant Secretary of Labor for Occupational Safety and Health (or Designee), or the director of the National Institute for Occupational Safety and Health (or Designee) in accordance with the requirements of 29CFR1910.10 (e). This program or future revisions of it will be maintained by Crystal Newman - Safety Officer.

INTRODUCTION

Paragraph (e) of the Federal OSHA Hazard Communication Standard (29 CFR 1910.1200) requires all employers subject to this rule to develop and implement a written hazard communication program. The following pages detail the program for Metal Locking Service Inc. facilities. This document will also be used as a vehicle for providing information to employees about the specifics of this site's hazard communication program. Any questions regarding the written program should be referred to Crystal Newman - Safety Officer.

POLICY

The policy of Metal Locking Service Inc. is to perform work in the safest manner possible. Metal Locking Service Inc. will provide the safest possible working conditions for its employees' workplace. It is a condition of employment for employees of Metal Locking Service Inc. to acknowledge, in writing, that they have received a briefing on this program and that they agree to follow all directions, written, verbal, and visual pertaining to this program. This written Hazard Communication program will be available upon request to employees, their designated representative(s), Emergency Personnel, and interested members of the community.

PURPOSE

The purpose of the Metal Locking Service Inc. Hazard Communication Program is to inform its employees of the Occupational Safety and Health Administration (OSHA) Regulation which requires that employees be informed concerning hazards from chemicals that they may encounter at the workplaces and appropriate protective measures they can take. The objective of the Hazard Communication program is:

- To safeguard our employees' health by providing a management guide for safe compliance.
- To provide our employees, subcontractors and licensed vendors with necessary information concerning health and physical hazards of the chemical materials in use at the workplace.

CHAPTER 1: IMPLEMENTATION PROCEDURES FOR SECTION 1910.1200 (f) LABELS AND OTHER FORMS OF WARNING

HAZARDOUS CHEMICALS PURCHASED FROM SUPPLIERS

- A. Metal Locking Service Inc. will rely on the labeling information provided by the vendors. Existing labels will not be removed or defaced unless the container is immediately marked with the required information. Any missing or defaced Labels will be replaced as soon as possible.

- B. When a hazardous chemical is transferred from a shipping container to an in-house container, the latter must be appropriately labeled with the required information.

- C. Labels for in-house containers will either be one (1) obtained from the supplier two (2) obtained from a label vendor and prepared by Metal Locking Service Inc.

- D. Responsibility for ensuring of proper labeling to in-house containers will be that of the Safety Officer.

CHAPTER 2: IMPLEMENTATION PROCEDURES FOR SECTION 1910.1200 (g) MATERIAL SAFETY DATA SHEET MSDS'S

I. HAZARDOUS CHEMICALS PURCHASED FROM SUPPLIERS

A. Metal Locking Service Inc. will rely on the MSDS's prepared by the manufacturer (the term used in this document also includes "importer") and sent by the supplier.

B. The Safety Officer at this facility will have the responsibility of ensuring that MSDS's are received on all purchased hazardous chemicals. If an MSDS is not received on a hazardous chemical within thirty (30) days of the receipt of the product, a letter will be sent to the supplier.

C. Copies of MSDS's will be kept on file and be made available for employee inspection during each workshift. The MSDS files will be maintained in the following location:

COUNTER OF TOOL ROOM

Maintenance of MSDS general file for these facilities will be the responsibility of the Safety Officer. Any missing, incomplete, or apparently inaccurate MSDS's are to be reported to the Safety Officer who will initiate the acquisition of new or revised sheets.

D. If user person or persons becomes aware of incomplete or apparently inaccurate MSDS's, he/she will work with the Safety Officer to obtain a revised MSDS from the manufacturer.

CHAPTER 3: IMPLEMENTATION PROCEDURES FOR SECTION 1910.1200 (h) EMPLOYEE INFORMATION AND TRAINING

I. CORE TRAINING

A. All current employees subject to the Standard will receive basic training on the following:

1. Requirements of the Standard.
2. Description of MSDS's and how to read them.
3. Description of labels and/or other forms of warning and how to read them.
4. The location and availability of this written hazard communication program (including the required hazardous chemicals list).
5. The location and availability of MSDS's.
6. How employees can get access to and use the appropriate hazard information.

B. All newly hired employees exposed to hazardous chemicals for the first time at this facility will receive the core training before starting their new positions.

C. The Safety Officer will be responsible for overseeing the presentation of the core training program to all current and new employees.

D. Core training will be documented by having all employees who receive such information sign a form attesting to this training.

E. Hazards of Non-Routine Tasks

1. Supervisors will inform employees of any non-routine tasks that may arise which would involve possible exposure to hazardous materials.
2. Review of safe work procedures and use of required personal protective equipment will be conducted prior to the start of such tasks. Where necessary, areas will be posted to indicate the nature of the hazard involved.

CHAPTER 3 CONT.....

Informing other Employees

1. Other site employees are required to adhere to the provisions of the Hazard Communication Standard.
2. Information on hazardous materials known to be present will be exchanged with other employers. Employers will be responsible for providing necessary information to their employees.
3. Other on- site employers will be provided with a copy of our hazard communication program by our shop supervisor.

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216 Colgate Avenue Buffalo, NY 14220

Phone (716) 824-4359 Fax (716) 824-0903

I acknowledge that I have received a copy of the company hazardous communications standard written program, and I will make every effort to abide by the same.

Name (please print) _____

Signature_____

Date_____

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LOCKOUT/TAGOUT SYSTEM

WRITTEN PROGRAM

PREFACE

GENERAL

Lockout is the preferred method of isolating machines or equipment from energy sources. To assist employers in developing a procedure which meets the requirements of the standard, however, the following simple procedure is provided for the use in both lockout or tagout programs. This procedure may be used when there are limited number or types of machines or equipment or there is a single power source. For more complex systems, a more comprehensive procedure will need to be developed, documented and utilized.

PURPOSE

This procedure establishes the minimum requirements for the lockout or tagout of energy isolating devices. It shall be used to ensure that the machine 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.

RESPONSIBILITY

Appropriate employees shall be instructed in the safety significance of the lockout (or tagout) procedure including the shop senior leadmen, leadmen and/or foremen. 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.

PREPARATION FOR LOCKOUT OR TAGOUT

Make a survey to locate and identify all isolating devices to be certain switches, valves or other energy isolating devices apply to the equipment to be locked or tagged out. More than one energy source (electrical, mechanical, or others) may be involved.

SEQUENCE OF LOCKOUT OR TAGOUT SYSTEM PROCEDURE

1. Notify all affected employees that a lockout or tagout system is going to be utilized and the reason therefor. 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 procedure (depress stop button, open toggle switch, etc.)
3. Operate the switch, valve, or other energy isolating device(s) so that the equipment is isolated from its energy source(s). Stored energy (such as that in springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc.) must be dissipated or restrained by methods such as repositioning, blocking, bleeding down, etc.
4. Lockout and/or tagout the energy isolating devices with assigned individual lock(s) or tag(s).
5. After ensuring that no personnel are exposed, as a check on having disconnected the energy sources, operate the push button or other normal operating controls to make certain the equipment will not operate.

CAUTION: Return operating control(s) to “neutral” or “off” position after the test.

6. The equipment is now locked out or tagged out.

RESTORING MACHINES OR EQUIPMENT TO NORMAL PRODUCTION OPERATIONS

1. After the servicing and/or maintenance is complete and equipment is ready for normal production operations, check the area around the machines or equipment to ensure no one is exposed.
2. After all tools have been removed from the machine or equipment, guards have been reinstalled and employees are in the clear, remove all lockout or tagout devices. Operate the energy isolating devices to restore energy to the machine or equipment.

PROCEDURE INVOLVING MORE THAN ONE PERSON

In the preceding steps, if more than one individual is required to lockout or tagout equipment, each shall place his/her own personal lockout device or tagout device on the energy isolating device(s). When an energy isolating device cannot accept multiple locks or tags, a multiple lockout or tagout system (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 allow 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/her lockout protection, that person will remove his/her lock from the box or cabinet.

BASIC RULES FOR USING LOCKOUT OR TAGOUT SYSTEM PROCEDURE

All equipment shall be locked out or tagged out to protect against accidental or inadvertent operation when such operation 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.

BASIC RULES FOR USING LOCKOUT OR TAGOUT AT CUSTOMER'S FACILITIES

All employees will comply with the customer's lockout or tagout procedures and regulations while working at that particular plant. Also, if the procedure is questionable or inadequate, contact your immediate supervisor for procedure.

Should the customer have no lockout or tagout procedure, refer to our company procedure.

LOCK OUT

There is only one sure way you can **protect yourself** from unexpected operation of a piece of equipment - and that is to **lock it out**.

A lockout is simply a lock put on a power source to prevent accidents that might be caused by catching someone in the wrong place at the wrong time.

1. Identify all the energy sources on a piece of equipment to determine where it can be isolated.
 2. Find the energy-isolating devices and be sure they are properly labeled. Don't rely on memory, especially where complex machinery is involved.
 3. If the system is complex, make a checklist of de-energizing and startup procedures.
 4. An electrical lockout is normally done with an ordinary padlock. When more than one person is going to work on equipment, a multiple lockout device should be used. Each person should have an individual lock on the device. That way, the disconnect switch cannot be closed until everybody is in the clear.
 5. Before you turn off the power, check to be sure nobody is operating the equipment. A sudden loss of power could cause an accident.
 6. After the switch has been opened, snap your own lock on the lockout device. Anyone else involved must put a separate lock on at this time.
 7. Check the lockout device to be sure the switch, breaker or valve cannot be operated. Then try the controls on the equipment itself. After you have checked the disconnect, test to be sure the power source is de-energized.
 8. After the maintenance or repair work has been done, you are responsible for removing your own lock promptly.
 9. Once work on the equipment is finished, it is important to follow a regular procedure for releasing the equipment to production operations.
 10. Be sure all equipment components are operationally intact, including guards and safety devices. Repair or replace any defective safeguards or safety devices before you remove the lockouts.
- **Always do a lockout**, whenever you have to **be sure a machine will not operate**.
 - **Don't take shortcuts** with your lockouts - follow the rules to the letter.

- **Remember**-the lock you put on that power source is there for one reason-to protect you!

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I acknowledge that I have received a copy of the company
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Name (please print) _____

Signature _____

Date _____

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RESPIRATORY PROTECTION PROGRAM

WRITTEN PROGRAM

PURPOSE

The purpose of this Regulation is to define Metal Locking Service Inc.'s respiratory protection program. The objective of this standard is to protect employees from inhalation and ingestion of harmful levels of air contaminants.

POLICY

Employees shall not be exposed to air contaminants which exceed the limits detailed in OSHA Regulation CFR 1910.1000. When there is a probability of exposure of air contaminants exceeding these limits, proper respiratory protection shall be required.

SCOPE

This policy applies to all personnel in the performance of their jobs at Metal Locking Service Inc.

PROCEDURE

A. Determination of Need of Respiratory Protection

1. The supervisor of any operation involving the release, or possible release, of airborne contaminants such as dusts, gases, fumes, mists, etc. should contact the Safety Department or management for advice on precautions to be taken.
2. The Shop Supervisor will make a decision on the need for respirators on the basis of material safety data sheets, industrial hygiene monitoring, medical experience, or other information as necessary.

B. Selection and Procurement of Respirators

1. Respirators shall be selected on the basis of the hazard to which the worker is exposed, recognizing the physical, chemical, and physiological properties of the air contaminant and the concentration likely to be encountered.
2. Respirators are available from the facility. These respirators remove particulate gaseous materials through filtration and/or absorption. They must not be used in atmospheres containing less than 19.5% oxygen by volume. Respirators will be permanently assigned to employees that require their use routinely. For operations involving short-term use, respirators will be temporarily assigned to employees. These respirators shall be returned to the facility upon completion of the operation.

C. Operations Requiring Respiratory Protection

All employees performing jobs which are designated mandatory respirator jobs shall be informed of this requirement. This shall be done through:

1. Specifying the correct respirator in the Job Description or other such written procedure for that job.
2. Postings in the department or signs in that area where the job exists.

D. Training

Employees required to use a respirator shall be trained annually by supervision in the need, selection, fitting, use and care of respirators. This training must be documented and shall include:

1. Instruction in the nature of the hazard for which the respirators are being worn.
2. Discussion of why the respirator designated is the proper type for the particular purpose, and the extent and limit of protection of the respirator.
3. Fitting and use shall include demonstration and practice in correct fitting, adjusting and using as recommended by the manufacturer.
4. Care shall include instruction in cleaning and disinfecting, checking of valves, applying and removing prefilters and cartridges, and obtaining and storing respirators.
5. As an aid in training, instructions from the manufacturer are helpful.

E. Fit Testing

1. Qualitative Fit Testing

Each employee required to wear a respirator will be annually fit tested in a test atmosphere. This is done to ensure that each employee is able to obtain a good face to piece seal. The fit test will be performed by the Training Coordinator under guidelines established by Metal Locking Service Inc.

a) Positive and Negative Pressure Tests

- a. Respirator users shall be trained in how to perform positive and negative pressure tests and should use them each time the respirator is donned as a means of quickly checking respirator fit.
- b. **Positive Pressure Test** - This test is performed by closing off the respirator exhalation valve using the palm of the hand and exhaling gently into the face piece. The fit is considered satisfactory if slight positive

pressure can be built up inside the face piece without any evidence of outward leakage.

- c. **Negative Pressure Test** - In this test, the user closes off the air inlet of the respirator by covering it so that it cannot pass air, inhales gently so that face piece collapses slightly; and holds breath for about ten (10) seconds. If the face piece remains slightly collapsed and no inward leakage is detected, a suitable fit exists.

Inspection, Cleaning, Maintenance and Storage

1. Respirators permanently assigned to employees should be thoroughly cleaned with sanitizing solution after each use. Clean respirators should be stored either in a clean bag or in a clean cabinet located near the operating area or in the employee's locker. To prevent damage, respirators should not be stored in tool boxes unless they are in carrying cases or cartons.

Program Evaluation

Random inspections should be conducted frequently by the supervisor to assure that respirators are properly selected, used, cleaned and maintained.

Respirator Approval

Only the National Institute for Occupational Safety & Health (NIOSH) and Mine Enforcement & Safety Administration (MESA) approved (tested and certified) respirators should be used. Respirators shall be used only for the substances for which they are designed.

Medical Approval

Persons should not be assigned to tasks requiring use of respirators unless it has been determined that they are physically able to perform the work while wearing a respirator. Persons who will be assigned to the mandatory use of respirators will have their medical history reviewed by a Medical Department before starting employment. The medical status of those required to use respirators should be reviewed periodically thereafter. Based on the overall

health of the individual, the doctor determines if the employee shall be restricted from wearing respiratory protective equipment. If a restriction is applied, supervision is notified and this fact is indicated on the employee's medical records.

Metal Locking Service Inc.

216 Colgate Avenue Buffalo, NY 14220

Phone (716) 824-4359 Fax (716) 824-0903

I acknowledge that I have received a copy of the company Respiratory Program and I will make every effort to abide by the same.

Name

Signature

Date

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Phone (716) 824-4359 Fax (716) 824-0903

www.castironrepair.com

CONFINED SPACE PROGRAM

CONFINED SPACE ENTRY

PERMIT REQUIRED CONFINED SPACE ENTRY

I. GENERAL POLICY AND PURPOSE

The purpose of this program is to inform all employees of Metal Locking Service Inc. of this company's efforts and methods in complying with the OSHA Confined Space Entry Standard and the OSHA Permit Required Confined Space Entry Standard.

Under this program each employee will be informed of all the sections of these standards. Our goal is to utilize the requirements of the Confined Space Entry Standard and the Permit Required Confined Space to increase the awareness level and safety of all employees who work in or near confined spaces, and to provide confined space workers (authorized entrants, attendants, entry supervisors, and rescue and emergency services personnel) with the information and skill training needed to safely do their jobs.

Crystal Newman, Safety Officer, is the designated program coordinator and has overall responsibility for the program. Crystal Newman will ensure that the program is updated as necessary and reviewed at least annually to ensure that employees participating in entry operations are protected from confined space hazards.

DEFINITIONS

Confined space: An area that is large enough for an employee to enter and is not designed for continuous occupancy and has either limited or restricted access points.

Non-permit confined space: A space that does not contain or have the potential to contain any hazard capable of causing serious injury. A space may be classified as such only if there are no actual or potential atmospheric hazards and all other hazards have been eliminated.

Permit-required confined space: A confined space that contains or has the potential to contain a hazardous atmosphere, contains a potentially engulfing material or has an internal configuration such that the entrant could be trapped.

RESPONSIBILITIES

ENTRANT SUPERVISOR (Leadman/Mechanic-Foreman)

- Initiates the required work documents for the specific operation and oversees the confined space operation.
- Confirms that all emergency response procedures are in place for the appropriate situation.
 1. Non-permit confined spaces.
 2. Permit-required confined space.
- Grants final approval for the confined space operation.
- Verifies that only authorized personnel participate in the confined space operation.
- Ensures that all persons have exited the confined space and terminate the confined space operation.

ATTENDANT (*Facility staff*)

- Performs only the assigned duties of an attendant.
- Reads and understands the requirements of the confined space operation including the behavioral effects of exposure to potential hazards.
- Maintains the count and identity of the entrants and restricts access into confined spaces to authorized entrants only.
- Maintains continuous communications between the entrants and confined space supervisor.
- Initiates evacuation of the confined space if one of the following criteria exists:
 1. Entrants exhibit signs of duress.
 2. A hazardous condition arises either inside or outside the confined space.
 3. Attendant cannot perform in the required capacity.
 4. If a rescue team is called out to perform a confined space rescue, all confined space operations are immediately canceled until the rescue team becomes available again.
- Calls emergency personnel if required, and performs non-entry rescue if possible.
- Does not leave post unless replaced or relieved by another authorized attendant. All personnel involved in the confined space operation must be aware that the personnel change is to occur.

AUTHORIZED ENTRANT (Mechanic-Foreman on duty)

- Reads and understands the stated conditions or hazards related to the confined space.
- Is trained in the use and utilization of the proper personnel protective equipment (PPE) required in the particular situation.
- Alerts attendant if a hazardous condition becomes evident and exits the confined space.
- Immediately exits confined space when directed by the attendant or supervisor. Does not re-enter until authorized by the entrant supervisor.
- Preplans work activities to minimize the time required in the confined space.

PERMIT REQUIRED CONFINED SPACE

PRE-ENTRY ACTIVITIES

- Entry Supervisor shall conduct a pre-job briefing with all personnel involved with the permit required confined space operation. Entry Supervisor shall ensure that the required documentation (Metal Locking Service Inc. Confined Space Entry Permit) is completed and shall read the restrictions identified to the affected personnel during the pre-job brief.
- Entry Supervisor shall insure that pre-entry testing has been completed.
- Attendant shall set up barriers as required around entrance to the permit required confined space.
- Attendant shall set up and test the communications system utilized with the entrant as well as the emergency response. Attendant shall maintain radio contact with the rescue team if required.
- All authorized entrants shall wear the required PPE.
- Attendant shall check each entrants PPE to ensure they are being worn correctly and physically acceptable.

ENTRY ACTIVITIES

- Attendant shall remain stationed at the entrance of the permit required confined space at all times unless properly relieved.
- Authorized entrants shall enter the permit required confined space to perform the assigned task.

POST ENTRY PROCEDURES

- Attendant shall secure the confined space from re-entry.
- Attendant shall notify the entry supervisor that the entrants have completed their assigned task and have exited the permit required confined space.
- Entry Supervisor shall confirm that entry operations have been completed and that all entrants have left the confined space. Entry supervisor shall notify the rescue team that the permitted confined space entry has been completed.

Non-Permit Required Confined Spaces

WARNING: Initial entry into a confined space may be immediately dangerous to life or health (IDLH) due to unknown conditions within the confined space. If an initial entry is required to obtain acceptable entry conditions for the purpose of a non-permit entry, this initial entry shall be performed in accordance with the permit required entry procedure.

PRE-ENTRY ACTIVITY

- Entry Supervisor shall conduct a pre-job briefing with all personnel involved with the non-permit required confined space operation. Entry Supervisor shall ensure that the required documentation is completed and shall read the restrictions identified to the affected personnel during the pre-job brief. All persons entering the confined space shall sign an attendance sheet confirming that they were briefed and are aware of any potential hazards.
- Entry Supervisor shall insure that pre-entry testing has been completed and shall be tested periodically to ensure that acceptable entry conditions are being maintained.
- Entry Supervisor shall ensure all necessary equipment is available at the job site and in proper repair. This may include barriers, shields, tools/equipment needed to complete the job, PPE and equipment for communication, ventilation, lighting, and rescue/emergency services.
- Entry Supervisor shall set up barriers around job site if there are any exterior exposures that may harm entrants authorized to enter or interfere with the job.
- Entry Supervisor shall verify that all necessary controls are in place and verify that acceptable entry conditions have been established. These actions authorize entry operations to begin.

ENTRY ACTIVITIES

- When all necessary controls have been established and the entry supervisor has authorized entry operations to begin, proceed with entry as follows:
 1. Authorized entrant(s) shall lower all the necessary equipment/tools into the confined space (CS) first to avoid injury from any overhead falling items.
 2. The authorized entrant(s) shall establish communication between the authorized entrant(s) and the entry supervisor.
 3. Authorized entrant(s) wear PPE as directed.
 4. Authorized entrant(s) may now enter CS to perform assigned work within CS.
 5. Confirm communication between authorized entrant(s) and Entry Supervisor.
 6. If a hazardous atmosphere is detected during entry:
 - a) Authorized entrant(s) shall immediately exit the space.
 - b) Authorized entrant(s) shall notify the entry supervisor immediately after exiting the CS.
 - c) Entry Supervisor shall evaluate the space to determine how the hazardous atmosphere developed.
 - d) Entry Supervisor shall ensure measures have been implemented to protect authorized entrant(s) before subsequent entry operations begin.

ENTRY ACTIVITIES CONT....

- a) Authorized entrant(s) shall exit the CS immediately when:
 - a) Ordered to exit by the Entry Supervisor.

- b) Authorized entrant recognizes any warning sign or symptom of exposure to danger;
or
- c) Authorized entrant detects prohibited condition;
or
- d) Any evacuation alarm sounds;
or
- e) Work has been completed.

POST ENTRY ACTIVITIES FOR NPCS ENTRY

A. Entry Supervisor shall confirm that entry operations have concluded, that all entrants have exited the CS, and that all equipment/tools have been removed from the CS.

B. Information describing any hazards confronted/created during CS entry operations or specific problems related to the CS shall be noted by the Entry Supervisor for future review.

C. All personnel/departments previously notified shall be further notified that equipment/systems have been returned to service by the Entry Supervisor.

GENERAL

Confined space work shall be performed only by personnel trained in confined space safety. The communication utilized between the attendant and entrant may be by direct voice contact, by pull rope or by radio contact. Communications between the attendant stationed at the confined space entrance and rescue service may be by telephone or radio contact (normally radio contact since phones are not necessarily at the confined space entrance). In all cases, the communication system shall be tested prior to initiating confined space orientation. Oxygen levels in a confined space must be between 19.5% and 23.5%. If any operation such as burning or welding is to be conducted in the confined space, then, adequate ventilation must be provided to maintain a safe atmosphere.

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I acknowledge that I have received a copy of the company Confined Space Program and I will make every effort to abide by the same.

Name _____

Signature _____

Date _____

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SAFETY FOR FORK LIFT/POWERED INDUSTRIAL TRUCKS

GENERAL SAFETY RULES: FORK LIFT / POWERED INDUSTRIAL TRUCKS

1. When an employee is certified to operate a lift truck, it shall be so noted in his/her personnel record.
2. In the event of an accident involving a lift truck and involving personal injury or damage to company property or product, the driver must report the incident to one of his/her senior lead men or lead men immediately. The (senior) lead man will make a complete report on the occurrence.
3. The company reserves the right to suspend or cancel a driver's certification for reckless or careless operation, abuse of equipment, for failing to report an accident, for unauthorized use of equipment, or driving violations of a serious nature.
4. Use of any lift truck by unauthorized personnel is prohibited.

POLICY STATEMENT: FORK LIFT/POWERED INDUSTRIAL TRUCKS

Fork Lift Trucks and similar Power Actuated Vehicles - Operating Instructions

1. Only authorized personnel may operate power trucks.
2. Drive at safe speed: Recommended maximum speed is 5 mph, but consider the condition of the floor, the size of aisles, corners encountered, load being carried, and then set your speed accordingly.
3. Lift with mat vertical or tilted slightly back - **Never forward** : This rule is related to the rated capacity. The farther away the load is from the front wheels when tilted forward, the smaller the load that can be carried. This loss in capacity can amount to as much as 300 lbs. at a height of 9 ft.
4. Make certain the load on the pallet is distributed evenly: The pallet should be loaded correctly and picked-up by the power truck at the right angle to avoid the dangers of too much overhang, uneven distribution, top heaviness, and slipping of the pallets on the forks.
5. Never travel with load lifted high: 6 inches from the floor is a practical safe height to carry forks. Do not lift load while traveling. The stability of the load is greatly lessened by lifting the load while in motion.
6. Go slow around corners: Give pedestrians the right of way. Always signal by blowing your horn. Do not cut corners. This practice results in upset loads, damaged goods and serious injury.
7. Be prepared to stop immediately without overturning any part of the load being carried. You may be able to stop the truck in time, but an upset load can seriously injure pedestrians.
8. Drive backwards while looking in different directions when bulky loads interfere with (front) vision.
9. When traveling on grades, always keep load on uphill side of truck: That is, when traveling downhill, the truck should be driven backward and when traveling uphill, the truck should be driven forward.
10. When driving power trucks onto trailers: Make sure that trailer brakes are set and wheel blocks are in place. Be sure bridge plates into trucks and railroad cars are wide, strong, and secure.

Fork Lift Trucks and Similar Power Actuated Vehicles - Operating Instructions Cont.....

11. Prior to loading and unloading a trailer, operators must make certain that the tractor is attached or the nose of the trailer is properly supported by jacks, barrels, braces, or other safe means.
12. Watch overhead clearances for masts and loads.
13. Only the operator should ride power truck: Riding on forks can cause serious injury and is prohibited.
14. Shut off motor and apply emergency brakes when truck is not in use: If the truck is left unattended, remove the ignition key so that persons not authorized to drive the power truck will not do so. Do not leave power truck with forks off the ground. Be careful that the forks do not create a tripping hazard which could mean serious bodily injury.
15. Operator should not make repairs on a power truck: Defects or adjustments which need to be repaired should be reported immediately to one of the lead men. Every morning - report visual damage, leaks and operational checks (horn, steering, breaks).
16. Never place your arms or legs between the uprights of the mast or outside the running lines of the truck.
17. Smoking is strictly forbidden when filling, changing, adjusting propane tanks.
18. Failure to observe the above rules will endanger the lives of your fellow workers and may result in costly damage to equipment and product. Violations may result in disciplinary action, up to and including discharge.
19. Employees will be subject to disciplinary action for violation of any safety rules or practices.

Fork Lift and other similar vehicle's fueling requirements

1. Specific procedures must be followed when handling LPG fuel.
 - A. LPG containers should be stored in the same relative position as they are installed in the truck.
 - B. Containers must be carried, not dropped, rolled, or dragged.
 - C. Removable tanks must be securely mounted to prevent them from jarring loose.
 - D. Only trained, designated personnel should fill or exchange LPG tanks.
 - E. Smoking is prohibited in the refueling area and when exchanging tanks.

2. **Procedures for battery changing and charging**
 - A. Facilities for flushing and neutralizing spilled electrolyte and venting fumes from gassing batteries must be available in the immediate area.
 - B. Use on properly designed lifting equipment for handling batteries.
 - C. When mixing electrolyte, acid should always be poured into water, never water poured into acid.
 - D. The truck shall be properly positioned and the brakes locked before battery changes are made.
 - E. Due to hydrogen emission from charging batteries, no smoking will be allowed in charging areas.

Reference
N.F.P.A. 505
N.F.P.A. 58

Fork Lift and other similar vehicle's fueling requirements cont.....

3. Fueling procedures for gasoline powered industrial trucks.

- A. Fill tanks in the open at a prescribed location.
 - B. Use care to avoid spilling gasoline during the fueling operations.
 - C. Motor exhaust pipes should be cool. Fires have been caused when gasoline dripped onto them while hot.
 - D. Ignition switches must be turned off. Accidental spills should be allowed to evaporate before turning switches on.
 - E. Ignition systems should be inspected frequently for shorts, worn or naked wires. Defects should be repaired promptly.
 - F. No smoking rules apply when filling tanks. The area should be posted to avoid smokers approaching the operating area.
 - G. In filling tanks with a hose, the metal nozzle should always contact the side of the tank opening to prevent static sparks.
 - H. When filling from a can, only U.L. approved safety dispensing cans with a flexible metal spout may be used. The spout must contact the tank to prevent static sparks.
 - I. Gasoline powered trucks may be brought inside buildings only for maintenance or with permission of the safety department.
4. All repairs should be made in an adequately protected area and suitable fire protection provided.

Color Coding of Fork Lift Trucks and Similar Equipment

1. Solid yellow is the standard color identification for all power operated in-plant vehicles (fork lift trucks, industrial tractors, etc.)
2. New trucks and equipment being acquired should be painted yellow by the vendor.
3. When re-painting of existing equipment is required, equipment shall be thoroughly cleaned. Do not paint or deface the manufacturer's tag showing capacities, attachments, etc.

References: American National Standards Institute, code 253.1-1967
"Safety Color Code for marking Physical Hazards", OSHA 1910.44

Design Requirements for Fork Lift Trucks and Similar Equipment

1. All high lift rider type trucks must be equipped with an overhead guard, providing that operating conditions permit.
2. If loads being handled present a hazard, a load back rest extension must be employed to minimize the possibility of the load, or part of it, falling backwards.
3. No fork lift or similar equipment shall be modified or changed where such changes affect the capacity and safety operation of the truck, without prior written approval from the manufacturer.
4. All fork lifts acquired from vendors shall be equipped with back-up alarms and flasher light.
5. An alarm to sound when failing to set parking brake will be included on all newly acquired trucks.

References

OSHA 1910.178
A.N.S.I. B56.1-1969

Chock Blocks, Stops and Ramps for Power Driven Equipment Protection

1. Chock blocks should be used to keep fork lift trucks, payloaders, and similar equipment from moving when parked for any reason on inclines.
2. Stops and ramps should be sufficiently high, and so constructed that vehicles cannot run off when traveling forward or backward, and cannot topple off from the side.
3. All ramps are to be provided with curbing so the wheels cannot run off or skid off.
4. Truck and freight car ramps are to be provided with stops so that they cannot move in any direction during loading or unloading operations.
5. When freight car doors are opened on the off loading side, the opening should be protected with a barrier to prevent a lift truck or payloader from falling through that side.
6. No fork truck is to enter any trailer or rail car unless they are protected with chocks or derail devices with warning signs.
7. Trailers shall not be entered with a lift truck unless they are designed for trucks and have either the tractor or jacks under the front. Trailer wheels shall be chocked.

Reference

OSHA 1910.176, .78

DAILY SAFETY CHECK PROCEDURE

A qualified employee:

1. Inspects the truck at the start of the shift using the standard check-off sheet.
2. If a truck passes its daily safety check, the inspecting employee may place the truck in service. If the truck has major defects that require immediate attention, as described by the check-off sheet, the inspector tags the truck, notifies one of the senior lead men or lead men who will send the truck to the repair area. If the truck is found to have minor defects, as described by the check-off sheet, the inspector notifies the senior lead man who make the decision to put the truck in service or to tag the truck. If the senior lead man decides to put the truck in service with minor defects, one of the senior lead men must sign the check-off sheet for that day to show he is aware of the truck's minor defects. A senior lead man does not have the authority to put a truck in service that has major defects as described by the check-off sheet.

POWER TRUCK INSPECTION EXPLANATION

ELECTRIC PALLET TRUCK

- *A. Brake functions properly.
 - 1. Test both forward and reverse, trying brake in handle up position. Do not release handle during the test. Vehicle to stop in not more than one foot of travel.
 - 2. Test both forward and reverse, trying brake in handle down position. Vehicle to stop in not more than one foot of travel. "Old automatic" trucks may not have handle down brake. (Look for a connecting linkage at the base of the handle).
 - *B. Power is shut off in handle up position.
 - 1. Test by applying power switch in both directions with handle at rest in the up position. Must not make audible sound or move physically. (Some old style Moto-Trucks will make a clicking sound since low speed solenoid is energized but no complete circuit is made).
 - *C. Directional control contacts release.
 - 1. Test by holding handle in normal operating position. Apply power switch release, motor drive, on and off, should respond without lag. Perform more than once in both directions.
 - D. Low speed functioning (Moto-Trucks).
 - 1. Check for slow speed, forward and reverse, with slight turn of control switch.
 - 2. Turn (to complete) to full speed position. Must make a noticeable difference between the two speeds. (Some old style trucks slow speed is regulated by position of handle)
- Items marked with asterisk require immediate attention if defective or inoperative as they relate directly to safe operation.

POWER TRUCK INSPECTION EXPLANATION CONT.....

E. Tires O.K.

1. Visual Inspection for worn tires (i.e. flat spots, severed sections) by operating the truck and observing for bouncing type of action. Such could throw a load and cause undue wear of parts within the truck.

F. Battery.

1. Cable O.K. - Visually check the battery cable for frayed, cut or missing insulation. Also, any damage to the connector at the end of the cable. (If possible, visually check cable from stationary connector to motor).
2. Cover Secure - Visually check that necessary bolts are present and secure. Cover must rotate properly and be free of damage that would prevent proper closing.
3. Adequate Water - (Danger - Sulfuric Acid). Carefully remove cell cap and carefully (from a minimal distance) visually check for presence of water on disc above plates.
4. Case free of Acid Stains - Visually check for acid residue build up on sides of battery cases.

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I acknowledge that I have received a copy of the company Fork Lift/Powered Industrial Trucks Program and I will make every effort to abide by the same.

Name

Signature

Date

Metal Locking Service Inc.

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SAFETY FOR SUPERVISORS

SAFETY FOR SUPERVISORS

The supervisor is the one who controls men, machines, and working conditions in the area supervised on a daily, knowledgeable full time basis. He or she is the only one who can keep employees safety conscious all of the time; and do so by applying the overall safety and health program to the specific conditions in his or her area of supervision. The good supervisor will know how to delegate and how to enforce safety practices. So, the supervisor is the key person in any company's safety effort.

By his or her actions, the supervisor sets the workmanship standards in his or her area, including safety. Line management, from the "head of the house" to supervision, must show a visible interest in safety. A supervisor must not walk by an unsafe situation without taking corrective action immediately; silence gives consent.

The supervisor should counsel an employee on safety and health lapses without talking down to him - even during a reprimand. The purpose should be to keep the employee as part of the team, avoid personal resentments, and instill well-learned lessons as effectively as possible.

Employees prefer to work in safe environments with firm, fair supervision. Leniency has its limitations in promoting good safety and health practices.

SAFETY FOR SUPERVISORS CONT.....

Supervisors should involve their work crews in the safety program by holding short meetings on the job that concentrate on one or two safety subjects, or recent accidents. Employees' suggestions should be listened to and utilized if at all possible. When a suggestion cannot be used, tell the employee why.

Supervisors should always point out the hazards of the job when assigning work and explain to the workers - including the experienced ones - how to do the job safely. Knowledge and experience should be shared.

The last line of defense from injury is personal protective equipment. Specify it. See that it is used. A supervisor should never enter a job site without the appropriate personal protective equipment. A supervisor must set a good example. The highest safety performance that a supervisor can expect from people reporting to him is the level of minimum standards that he establishes and maintains by his actions.

PRINCIPAL DUTIES OF SUPERVISORS IN DISCHARGING RESPONSIBILITIES FOR SAFETY

The principal duties of supervisors in discharging responsibilities for safety are as follows:

- G. Endorse all safety regulations in effect and make employees aware that violation of safety rules will not be tolerated.
- H. Make sure all injuries are reported promptly and all accidents are reported even if injury is not apparent.
- I. Conduct thorough investigations of all accidents and take necessary steps to prevent recurrence through employee safety education, operating procedures or modification of equipment.
- J. Provide employees with complete safety instructions regarding their duties prior to the employee's actual start of work.
- K. Conduct regular safety checks, including a careful examination of all new and relocated equipment before it is placed in operation.
- L. Properly maintain equipment and issue instructions for the elimination of fire and safety hazards.
- M. Continuously inspect for unsafe practices and conditions and promptly undertake any necessary corrective actions.
- N. Develop and administer an effective program of good housekeeping and maintain high standards of personal and operational cleanliness throughout all operations.
- O. Provide safety equipment and protective devices for each job based on knowledge of applicable standards.
- P. Conduct safety briefings at organizational meetings and encourage the use of employee safety suggestions.
- Q. Give full support to all safety procedures, activities and programs.

NEW EMPLOYEE INDOCTRINATION

At the beginning of his/her employment, each employee should know the company's safety policy, though the amount he/she can learn during the new employee orientation is limited. Unfamiliarity with his/her surroundings, interest in many matters of seemingly more immediate concern, the detailed procedure of getting onto payroll etc., all make it difficult for the new employee to absorb and retain detailed safety instructions. It is necessary, therefore, for the senior leadman/leadman to consider what safety information must be given first and the best way to present it.

EACH NEW EMPLOYEE SHOULD KNOW THE FOLLOWING:

1. Management is sincerely interested in preventing accidents.
2. Each employee is expected to report unsafe conditions which he encounters to his immediate supervisor.
3. The supervisor will give job instructions. No employee is expected to undertake a job until he/she has learned how to do it and is authorized to do it by his/her supervisor.
4. No employee should attempt a job that appears to him to be unsafe.
5. If an employee suffers an injury, even a slight one, he is required to report it at once.
6. Each employee is expected to understand and follow all company safety rules.

What to do if an employee sustains an injury while on the job

1. Determine the severity of the injury –does the employee require first aid or emergency care?
 - a. For first aid – take employee to Healthworks (1900 Ridge Road)
 - b. For emergency care – take employee to Mercy Hospital (565 Abbott Road)
 - c. If out of town – Ask customer where nearest facility is
2. Notify management (with-in 24 hours) of the incident, regardless of severity
3. Assist Safety Officer with the completion of an injury report
4. Do an accident investigation (including taking pictures)
5. Determine cause of accident and corrective action
6. Inform all employees of the accident as well as corrective action at next Tool Box talk
7. Implement necessary procedures to prevent accident from re-occurring

When a healthcare facility is looking for billing information, please give them our company address:

Metal Locking Service Inc.
216 Colgate Avenue
Buffalo, NY 14220

It is this company's policy to treat each injury as first aid until it is determined otherwise.

ACCIDENT INVESTIGATION

A. WHY SHOULD WE INVESTIGATE ACCIDENTS ?

The purpose of accident investigation is to discover the causative factors, the hazardous conditions, and the practices that brought the accident about, so that proper action may be taken to prevent a recurrence.

The need is for full information as to the causes - all the correctable causes that led to the accident, not just the major causes. This point brings out the importance of eliminating the factors of "fixing blame". If part of the purpose is to fix blame, or if any workers think it is, vital information will often be withheld or facts might be distorted.

So, planned investigation of accidents also has other purposes and advantages. When a good investigation procedure is in effect, it indicates to the employees involved that Management, represented by the Supervisor, very definitely is displaying its interest in finding out the "why" of accidents, and then doing something about correcting them, it is further proof to the employee that Management means business.

B. HOW SHOULD ACCIDENTS BE INVESTIGATED ?

1. Act at once. See the injured person immediately if at all possible.
2. Get the complete story of the case. Ask him or her or a witness to demonstrate how it happened. (If the accident involves a machine, never permit a person to demonstrate how it happened with the power on.)

C. REVIEW THE PHYSICAL CAUSES THAT MIGHT HAVE BEEN INVOLVE

1. Poor housekeeping.
2. Lack of proper guards.
3. Improper apparel (goggles, shoes, aprons, gloves, etc.)
4. Defective equipment, floors etc.
5. Poor working conditions.

ACCIDENT INVESTIGATION CONT....

D. REVIEW THE PERSONAL CAUSES

1. Dangerous practices.
2. Inability to perform job properly (inexperience, poor judgment).
3. Disobeying rules (poor attitude etc.)

E. FIND AS MANY CONTRIBUTORY CAUSES AS POSSIBLE; TRACE EACH ITEM DOWN TO WHY THAT CONDITION EXISTED.

F. DECIDE ON A GOOD PREVENTIVE REMEDY AND TAKE CARE OF IT.

G. TELL YOUR EMPLOYEES ABOUT THE ACCIDENT, AND SHOW THEM HOW TO AVOID IT.

H. DO A THOROUGH HONEST-TO-GOODNESS, FACT FINDING AND CORRECTIVE JOB.

CAPITALIZE ON THE ACCIDENT: DON'T REPEAT IT.

CAUSE CLASSIFICATION OF ACCIDENTS

UNSAFE ACTS

1. Working without authority.
2. Operating or working at unsafe speed.
3. Making safety devices inoperative.
4. Using improper tools or appliances.
5. Unsafe piling of materials.
6. Unsafe material handling.
7. Assuming hazardous position or posture.
8. Working on moving or dangerous equipment.
9. Distraction, teasing, abusing or startling.
10. Failure to use, or improper use of safe attire or personal protective equipment.
11. Failure to give or receive proper signals.
12. Working without instructions.
13. Failure to coordinate or cooperate.
14. Error in judgment.
15. Violations of specific instructions.
16. Failure to recognize an unsafe condition or practice.
17. Lack of inspection and maintenance.
18. Failure to establish safe working procedures.

UNSAFE CONDITIONS

19. Improperly guarded equipment.
20. Faulty design and installation of equipment or building.
21. Failure of machinery, equipment, structures, materials.
22. Hazardous arrangement, poor housekeeping, etc.

- 23. Improper illumination.
- 24. Hazardous dusts, gases, fumes and mists.
- 25. Physical defects of employees.
- 26. Natural condition beyond human control (Acts of Gods).

**ACCIDENT PREVENTION BEGINS WITH AN ACCURATE PIN-POINTING OF
THE CAUSES OF CONTRIBUTING FACTORS.**

Metal Locking Service Inc.

216 Colgate Avenue Buffalo, NY 14220

Phone (716) 824-4359 Fax (716) 824-0903

I acknowledge that I have received a copy of the company Safety for Supervisors program and I will make every effort to abide by the same.

Name

Signature

Date

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FALL PROTECTION POLICY

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The Company is committed to continuous Fall Hazard Control wherever the potential exists for personnel falls from heights of at least 6 feet. Accordingly, the Company will take all practical measures to eliminate, prevent, and control fall hazards. Work sites and activities shall be surveyed to identify all hazards of personnel falling from elevations. First consideration shall be given to the elimination of those hazards and, if a fall hazard cannot be practically eliminated, second consideration shall be given to implementing effective permanent means of fall protection.

If a fall hazard cannot be eliminated or fall prevention assured, effective fall protection means shall be planned, implemented, and carefully monitored to control the risks of personnel injury due to falling. Fall protection systems shall be continuous by design and supervision shall control against the intermittent or improper use.

All personnel (and their supervisors) working where fall hazards cannot be eliminated, or the onset of falls prevented, shall be uniformly equipped, trained, and given refresher training at specified intervals to minimize adverse effects of accidental falls. Fall protection equipment and training standards shall be established and compliance with the same shall be mandatory for all organizations. Furthermore, compliance by outside contractors shall be required when working on Company projects. **No exceptions.**

Elimination of Fall Hazards Elimination of fall hazards is the first and best line of defense against falls from heights. This task requires careful assessment of the workplace and the work itself. The “who, what, when, where, why, how, and how much” of each exposure is considered. Often, pre-consideration of the work and site not only leads to elimination of the hazard, but also identifies alternative approaches to the work that can measurably enhance productivity. The idea is to design safety directly into the work process and not simply try to add safety as an afterthought to an inherently unsafe work procedure. Examples include but are not limited to: servicing a pile hammer when laid down, back filling abutments, walls, etc., before employees access structures; using radios for signaling instead of employees hanging over the edge giving signals; and other mechanical devices that can be controlled from the ground.

Prevention of Falls Preventing falls is the second line of defense when fall hazards cannot be entirely eliminated. This also requires assessment of the workplace and work process. It involves making changes to the workplace so as to preclude the need to rely on the worker's behavior and personal protective equipment to prevent falls. Examples include but are not limited to: use of stairs, guardrails, barriers, and travel restriction systems to prevent the worker from direct and unprotected exposure to the fall hazard. These techniques deal with preventing the fall before the onset.

Control of Falls Controlling falls is the last line of defense. It should be considered only after determining that the fall hazard cannot be eliminated or the possibility of falling prevented. This is the domain of fall protection and calls for equipment such as: safety nets or harnesses, lanyards, shock absorbers, fall arresters, lifeline, and anchorage connectors. It deals with reducing the risk of injury in falling after onset of the fall. This fall protection also necessitates workplace and work process assessment and planning in order to select the proper equipment, installation and proper use of gear.

Evaluation of Fall Hazards The first step in evaluation of fall hazards is to identify the fall hazards. This is done by reviewing accident records, doing a canvas survey, and interviewing the workers themselves. Once a list of fall hazards has been collected, each hazard must be evaluated and prioritized in order of the most dangerous to determine which should be controlled immediately. Therefore, address these as rapidly as possible since there is no objective scientific method to make the distinction between those hazards most likely to produce harm with those least likely to produce harm.

Factors affecting probability of fall hazards include:

Proximity to the Edge Workers who must traverse or perform their work within 3 ft. of the edge of a fall hazard.

Type of Walking/Working Surface Workers traversing or working on ice, snow, oily surfaces, surfaces with trip hazards near the edge, and surfaces not recently inspected for capacity verification.

Type of Work Performed Workers who must push or pull tools or material are more likely to lose their balance and fall. Also, workers who cannot maintain three-point contact (two feet and one hand or two hands and one foot).

Particularly Dangerous Work Workers who must maintain good balance while walking I-beams; workers who must jump across floor openings or across edges; workers exposed to high winds, workers in poor lit areas or who work over water.

Exposure Time The longer a worker is exposed to a hazard, the greater the likelihood of an accident occurring. Thus, exposure time is a function of the frequency of exposure, the duration of the exposure, and the number of workers exposed.

The Bottom Line

Five construction workers are killed each day in America due to falls from elevated surfaces. Falls are the number one of cause of serious injuries in construction. Therefore, OSHA has prioritized fall protection enforcement and the Company will implement 100 percent fall protection to protect our employees and eliminate needless losses from falls. This will be enhanced through training, supervision monitoring, and most importantly, from employees who support Zero Lost Time Safety Excellence. And always, the safety department will be available for technical support and advisement.

HAZARDS IDENTIFIED at 216 COLGATE AVENUE

It had been identified that anytime one must use a ladder from atop the mill table to strap an object for movement, a hazard is present. Due to the inability to maintain three-point contact while strapping the object to the crane, personal protective equipment is required. The worker must use safety harnesses/lanyards and tie off whenever working on the ladder atop the mill table.

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