



**(Accident Prevention Program)**  
Formally known as the  
**Safety Manual 3.0 & Management System**

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## **Article I. INTRODUCTION AND PURPOSE**

**Section 1.01** The purpose of the Pyramid Acoustics Safety Policy manual is to define a set of standards, basic responsibilities, guidelines, rules and regulations. Pyramid Acoustics believes that no job or task is more important than the employee's health and safety. If a job presents a potential safety or health threat, the Company will take the appropriate steps to ensure that the work is performed safely. Pyramid Acoustics plans to achieve employee safety and health by employing a qualified safety person, making regular jobsite inspections, enforcing the use of safety equipment, following safety procedures and rules, on-going safety training, enforcing safety rules and using appropriate discipline. Pyramid Acoustics exists because of its employees; we must protect them.

**Section 1.02** Safety is more important than ever today. It's getting to the point where customers will not accept the bid for a potential job without obtaining a certain safety rating. Working safely improves productivity by cutting down lost work days due to injuries. Serious injuries involve big company costs, which cuts into the bottom line. But, the most important reason to work safely is to avoid serious injuries. Pyramid Acoustics wants every employee to go home to his/her friends and family every night. Workplace deaths happen at a rate of 1 per 19 seconds, or 10,000 per year! Another 9,000 people are disabled daily.

## **Article II. STATEMENT OF POLICY**

**Section 2.01** As employees, you have a right to expect a safe place in which to work, and it is management's responsibility to provide you such a place. Having accepted this responsibility, we feel that each of you, in turn, must accept the responsibility to work safely so that your life and the life of your coworker is not endangered. This means working intelligently, with common sense, and with forethought.

**Section 2.02** Management believes that it must set a policy which you can follow and on which you can rely. This policy is simply this:

- (a) *We do not want you to perform an act of work which is dangerous to the physical well-being of yourself or your fellow workers. In support of this policy, we have instructed our work supervisors that we do not want them to continue to employ a person who does not cooperate by conducting this work in a safe manner.*
- (b) *If at any time an employee or subcontractor on a jobsite believes he or she is being placed into an unsafe or dangerous situation or is witness to another person in a dangerous situation, that person should immediately stop work and ask for the supervisor to take appropriate steps to remedy the concern. We want to emphasize that every employee not only has the right to stop work, but should stop work, until the unsafe condition is rectified without fear of reprisal, discipline, or suspension or termination of employment.*

**There are endless examples of unsafe acts in this type of work. The safety rules are only a starting point. The situation itself will be the control. You must use your own judgment and experience to complete this list.**

### **Article III. CORPORATE EMPLOYEE SAFETY POLICY & RULES**

**Section 3.01** This company is sincerely interested in the safety of each and every employee. We have developed, promoted, and are enforcing a safety program designed to keep accidents to an absolute minimum, plant and work area conscientiously maintained, equipment mechanically sound, and hazardous substances controlled. Everything reasonably possible will be done to maintain safe work conditions. Each individual in a supervisory capacity is responsible for the safety of those in his/her charge. This company strives to comply with the Federal OSHA (Occupational Safety and Health Act of 1970), the Michigan Occupational Safety and Health Act (MIOSHA) and Act 154 of the Public Acts of 1974 effective January 1, 1975. Each employee is also expected to cooperate fully in helping to protect himself/herself and his/her fellow workers as outlined in the Federal and State OSHA requirements. Areas of responsibility and enforcement as outlined by this company are to be followed without exception. Violation of this policy, or failure to enforce it, will result in disciplinary action up to and including discharge.

### **Article IV. COMPANY SAFETY POLICY**

**Section 4.01** The Michigan Department of Labor and the US Occupational Safety and Health Administration have very strict and specific laws and attending rules and regulations concerning safety and accident prevention on the job site. The Company is bound by law to observe all state and federal rules which apply to your operation and to maintain and to post accurate records of any lost-time accidents by employees.

**Section 4.02** The Company Safety Policy prescribes the administration and methods by which a company can meet the requirements of federal and state rules and to ensure a safe work place for all of our employees. To accomplish this task, the prevention of accidents shall be considered an integral part of all operational activity and not as a separate program functioning independently from other activities. The same lines of responsibility shall be followed for accident prevention functions that are presently described for other operational or production functions. All personnel shall be responsible for safe work practices as prescribed by state and federal rules.

**Section 4.03** Disciplinary action may be taken against any employee or supervisor who willfully, knowingly or repeatedly violates any state or federal construction safety rules or any of the provisions within this Company Safety Policy.

### **Article V. SAFETY AND HEALTH OBJECTIVES**

**Section 5.01** Pyramid Acoustics plans to achieve worker safety and health through creating awareness in all employees in the following ways:

- (a) *By seeking to make an easy to remember lists of principles and procedures that, does not become over burdensome, and therefore unrealistic to implement we seek to create an awareness of hazards using mindsets and tools rather than strictly safety rules.*
- (b) *Designate a person responsible to coordinate the program.*
- (c) *Plan for safety before each job, using the tools provided herein. (Quick Mental Checklist)*
- (d) *Make regular job site safety inspections and conduct health monitoring.*
- (e) *Provide on-going safety training.*
- (f) *To take prompt action appropriate action in a timely manner.*

## Article VI. THE SAFETY WEBSITE

Section 6.01 The SDS information is online at our website: [www.pyramidacoustics.net](http://www.pyramidacoustics.net)

## Article VII. RESPONSIBILITIES

Section 7.01 It is the responsibility of each employee to develop a safety conscious attitude. It goes without saying, but must be said in today's culture of wanting to avoid responsibility that: **YOU ARE RESPONSIBLE FOR YOUR OWN SAFETY AND WELLBEING MORE THAN ANYONE ELSE.** The rules are meant for your protection, but if at some point wisdom must override a rule then ask questions. It is not just enough to know the rules but also why they are in place and how they came to be. Understanding the concept of safety means understanding and paying attention to the nature of things.

Section 7.02 Safety is not meant to slow productivity, we are here to do a job and not get hurt or die in the process. It is the responsibility of the foremen to look ahead to any safety precautions needed and arrange to pick them up or have them brought out to the site. This should be done long before it is to be used so as to not slow job flow.

### Section 7.03 General Safety Rules for everyone

- (a) *While we believe that it is a good idea to often wear hearing protection, it also may prohibit hearing warnings and communication. Therefore, because of liability and the nature of warnings through verbal communication we leave it up to the individual to use their best judgment to protect their ears and hearing and when to use protection.*
- (b) *Report unsafe conditions to your immediate supervisor. You are not required to work under unsafe conditions.*
- (c) *Promptly report all injuries to your immediate supervisor. Being injured on the job and not reporting same is cause for disciplinary action. Submit your report in writing, using the Accident/Injury Report from your supervisor.*
- (d) *Wear hard hats on the job site at all times.*
- (e) *Use approved eye and face protection where there is danger from flying objects or particles, such as when grinding, chipping, burning, welding, etc.*
- (f) *Dress properly. Wear appropriate work clothes, gloves, and shoes or boots. Loose clothing and jewelry must not be worn. Long hair must either be contained within a hairnet or cut to protect the employee from entanglement in rotating equipment.*
- (g) *Properly care for, and be responsible for all personal protective equipment.*
- (h) *Never operate any machine unless all guards and safety devices are in place and in proper working order.*
- (i) *Machine guards and safety devices must not be removed except for the purpose of repairs.*
- (j) *Cleaning, oiling, greasing and adjusting of machinery must not be done while the machine is in motion. All power sources must be disconnected. Lock-out or tag a machine when working on it.*
- (k) *Do not operate machinery if you are not an authorized operator.*
- (l) *Be alert and keep out from under overhead loads.*
- (m) *If a cable is damaged or shows that it is unsafe, no hoisting shall be done until the cable is thoroughly inspected and replaced, if necessary.*
- (n) *When riding in trucks, sit down. Do not ride fenders or stand up.*
- (o) *Do not jump off any vehicle while it is still in motion.*
- (p) *Riding material hoists or other moving equipment is prohibited except on seats provided.*

### Section 7.03 General Safety Rules for everyone (Continued)

- (a) *Moving of rolling scaffolds when men are on platforms is forbidden.*
- (b) *Wheels or casters of rolling scaffolds must be kept locked when employees are climbing or working on scaffold.*
- (c) *Before doing work where there is danger of coming in contact with electrical wires or equipment, notify your supervisor.*
- (d) *Do not leave materials in aisles, walkways, stairways, road or other points of egress.*
- (e) *Pile material safely. Use proper blocking, and never exceed a safe height.*
- (f) *Do not drop materials or tools from scaffolds or ladders.*
- (g) *Pull out or bend projecting nails.*
- (h) *Practice good housekeeping at all times.*
- (i) *Keep all tools in safe working condition. Never use defective tools or equipment. Damaged or worn parts must be promptly repaired or replaced.*
- (j) *Do not use frayed, broken, or ungrounded lead wires on electrical tools.*
- (k) *Do not use lock-on switches on electrical tools.*
- (l) *Place ladders on a substantial base, and do not use ladders with broken, split, or missing rungs or rails. All ladders are to extend at least three (3) feet above the landing platform and be securely fastened.*
- (m) *Metal ladders shall not be used where they may come into contact with an electrical circuit.*
- (n) *Always face the ladder when ascending or descending.*
- (o) *Portable ladders shall be used at such a pitch that the horizontal projected distance from the top support to the base is not greater than one-quarter the vertical distance between these points.*
- (p) *A step ladder shall not be used as a straight ladder by leaning it against a wall or other support.*
- (q) *A portable metal step ladder shall not be used where it or an employee may contact electrical conductors.*
- (r) *The height of a freestanding mobile scaffold shall not exceed four times the minimum base dimension. The scaffold then must be securely braced, guyed, anchored or be equipped with outriggers.*
- (s) *When a work platform is 6 feet or more in height, guard rails not less than nor more than 42 inches shall be used. Toe boards four inches high around the working platform shall be used.*
- (t) *Gasoline must be stored and transported in authorized cans only. Engines must be shut off when refueling, and no smoking is allowed anywhere near flammable liquids.*
- (u) *Compressed gas cylinders must be secured in an upright position.*
- (v) *When burning or welding is done, a fire extinguisher must be close at hand at all times. A person should stand fire watch while cutting or welding.*
- (w) *The use of, or being under the influence of intoxicating beverages, or illegal drugs while on the job is prohibited. Also, notify your supervisor when you are using drugs prescribed by a physician that could inhibit your ability to perform on the job.*
- (x) *All posted safety rules must be obeyed and must not be removed except by management's authorization.*
- (y) *Comply at all times with all known federal, state and local safety laws, employer regulations and policies.*
- (z) *Horseplay causes accidents and will not be tolerated.*
- (aa) *Outriggers should be used on lifting equipment for stability.*
- (bb) *When forklifts are not being used, leave forks on the ground so people will not walk into them.*

**VIOLATIONS OF ANY OF THESE RULES WILL BE CAUSE FOR IMMEDIATE DISCIPLINARY ACTION.**

## Article VIII.EMPLOYEE REPORT OF HAZARDS

Section 8.01 Our employees play a key role in identifying, controlling, and reporting hazards that may occur or already exist in the workplace. Employee reports of potential hazards can be an effective tool to trigger a closer look at a piece of equipment, operation, or how work is being performed. Reports of potential hazards can also provide suggestions to eliminate a hazard.

## Article IX. ACCIDENT/INCIDENT INVESTIGATION

Section 9.01 We will conduct an investigation for all accidents/incidents and near misses. Our primary goal of conducting an investigation is to determine the “root cause” to prevent the risk of a future occurrence. Investigation reports can help determine injury and illness trends over time, so that patterns with common causes can be identified and prevented. Investigations are not intended to place blame.

Section 9.02 Accidents and “near-miss” incidents will be investigated by The Safety Coordinator or Office Representative the reports will be reviewed by The Safety Coordinator or Office Representative within 12 normal hours during normal business hours of an accident/incident.

## Article X. ACCIDENT INVESTIGATION PROCEDURES

Section 10.01 All accidents resulting in injury or property damage will be investigated. The purpose of the investigation is NOT to find fault, but to find the cause of the accident so similar incidents can be prevented in the future.

Section 10.02 All accidents, no matter how minor must be reported to the Foreman immediately.

Section 10.03 Foremen must report all accidents to the Safety Coordinator as soon as possible.

Section 10.04 Foremen must complete an initial written accident investigation the day of the accident, if possible.

Section 10.05 All workers involved in the accident or who witnessed the accident must complete a written statement describing the incident.

Section 10.06 The Safety Coordinator will complete a thorough accident investigation to determine root causes and corrective actions.

Section 10.07 Near misses (situations where an accident almost happened) should be reported. Corrective action must be taken to prevent the same situation from occurring again with the potential for serious injury. Foremen should make a note of near misses and the corrective actions taken and report them to the Safety Coordinator, so that the same corrections may be made on all the company’s job sites.

## Article XI. HAZARD COMMUNICATIONS PROGRAM

**Section 11.01** Hazard communication means ensuring that all workers know about the chemicals that they work with and work around. Often called “Right to Know,” the hazard communication program involves the following elements.

- (a) *Written hazard communication program*
- (b) *Training on the chemicals this company uses.*
- (c) *Labeling: using properly labeled containers.*
- (d) *Safety Data Sheets (SDS): SDS (formerly known as Material Safety Data Sheets or MSDS) must be readily available onsite. Workers must know where to find SDS and be able to read and properly utilize an SDS.*
- (e) **Posting signs to inform employees of the location of SDS and when new chemicals are brought on the job site.**
- (f) *Informing other contractors: If we use chemicals around other contractors, it is our responsibility to inform other contractors of the hazards involved. We will make every effort to keep other contractors safe from the chemicals we use. Typically, the general contractor onsite will need to coordinate all chemical use of all contractors to maintain a safe workplace.*

**Section 11.02** This program has been prepared to comply with the requirements of the Federal OSHA standard 1926.59 and to ensure that information necessary for the safe use, handling and storage of hazardous chemicals is provided to and made available to employees.

**Section 11.03** This program includes guidelines on identification of chemical hazards and the preparation and proper use of container labels, placards and other types of warning devices.

### Section 11.04 CHEMICAL INVENTORY

- (a) *Pyramid Acoustics, Inc. maintains an inventory of all known chemicals in use on the worksite in MSDS and SDS binder. **The chemical inventory list is available from the Warehouse and Equipment Manager.***
- (b) *Hazardous chemicals brought onto the worksite by Pyramid Acoustics, Inc. will be included on the hazardous chemical inventory list.*

### Section 11.05 CONTAINER LABELING

- (a) *All chemicals on site will be stored in their original or approved containers with a proper label attached, except small quantities for immediate use. Any container not properly labeled should be given to the Warehouse and Equipment Manager for labeling or proper disposal.*
- (b) *Workers may dispense chemicals from original containers only in small quantities intended for immediate use. Any chemical left after work is completed must be returned to the original container or the Warehouse and Equipment Manager for proper handling.*
- (c) *No unmarked containers of any size are to be left in the work area unattended.*
- (d) *Pyramid Acoustics, Inc. will rely on manufacturer applied labels whenever possible, and will ensure these labels are maintained. Containers that are not labeled or on which the manufacturer's label has been removed will be relabeled.*
- (e) *Pyramid Acoustics, Inc. will ensure that each container is labeled with the identity of the hazardous chemical contained and any appropriate hazard warnings.*

(f)

#### **Section 11.06 MATERIAL SAFETY DATA SHEETS (MSDS)**

- (a) *Employees working with a Hazardous Chemical may request a copy of the material safety data sheet (MSDS). Requests for MSDS's should be made to the Warehouse and Equipment Manager.*
- (b) *MSDS should be available and standard chemical reference may also be available on the site to provide immediate reference to chemical safety information.*
- (c) *An emergency procedure to gain access to MSDS's information will be established.*

#### **Section 11.07 EMPLOYEE TRAINING**

- (a) *Employees will be trained to work safely with hazardous chemicals.*
- (b) *Employee training will include:*
- (c) *Methods that may be used to detect the release of hazardous chemical(s) in the workplace,*
- (d) *Physical and health hazards associated with chemicals,*
- (e) *Protective measures to be taken,*
- (f) *Safe work practices, emergency responses and use of personnel protective equipment,*
- (g) *Information on the Hazard Communication Standard, including*
- (h) *-- Labeling and warning systems, and,*
- (i) *-- An explanation of Material Safety Data Sheets.*

#### **Section 11.08 PERSONNEL PROTECTIVE EQUIPMENT (PPE)**

- (a) *Required PPE is available from the Warehouse and Equipment Manager. Any employee found in violation of PPE requirements may be subject to disciplinary actions, up to and including discharge.*

#### **Section 11.09 EMERGENCY RESPONSE**

- (a) *Any incident of over exposure or spill of a hazardous chemical/substance must be reported to the Human Resource Department.*
- (a) *The foremen or immediate supervisor will be responsible for ensuring proper emergency response actions are taken in leak/spill situations.*

#### **Section 11.10 HAZARDS OF NON-ROUTINE TASKS**

- (a) *Supervisors will inform employees of any special tasks that may arise which would involve possible exposure to hazardous chemicals.*
- (b) *Review of safe work procedures and use of required PPE will be conducted prior to the start of such tasks. Where necessary, areas will be posted to indicate the nature of the hazard involved.*

#### **Section 11.11 INFORMING OTHER EMPLOYERS**

- (a) *Other on-site employers are required to adhere to the provisions of the Hazard Communication Standard.*
- (b) *Information on hazardous chemicals known to be present will be exchanged with other employers. Employers will be responsible for providing necessary information to their employees.*
- (c) *Other on-site employers will be provided with a copy of Pyramid Acoustics, Inc.'s hazard communication program.*

#### **Section 11.12 POSTING**

- (a) *Pyramid Acoustics, Inc. has posted information for employees on the Hazard Communication Standard. This information can be found on the bulletin board in the warehouse lunch room.*

#### **Section 11.13 THE HAZARD COMMUNICATIONS STANDARD**

- (a) *The purpose of this standard is to make sure information on working safety with hazardous chemicals on the*

*jobsite is given to workers.*

- (b) *The standard requires manufacturers and distributors of chemicals to properly label chemical containers and to provide Materials Safety Data Sheets to downstream users of their products.*
- (c) *Employers must have a written Hazard Communication Program, [a chemical inventory list for each work site](#), and must train workers about chemicals and make available information on the chemicals in use in their workplaces.*
- (d) *Employers must provide training to workers in: the provision of the Hazard Communication Standard, physical and chemical properties of chemicals in use, protective measures for workers in using these chemicals in normal and non-routine tasks, and appropriate personnel protective equipment, safe work procedures and first aid measures. This training must be provided initially and when new chemical hazards are brought into the workplace.*
- (e) *The employers must also ensure that all chemical containers are labeled and train employees in the labeling, hazardous warning and monitoring (if any) systems in use at the jobsite.*
- (f) *Employees have the right to review the written Hazard Communication Program and chemical list for their jobsite. Employees can also request a copy of the Material Safety Data Sheet for any chemical they are using. Your foreman will tell you who to talk to review programs, obtain MSDS or receive more information.*
- (g) *Working safely with chemicals is a two-way street. Your employers will provide you with access to the needed information, but it's up to you to handle chemicals safely, and to use the proper protective equipment and safe work procedure whenever you are working with chemicals.*

#### **Section 11.14 CHEMICAL FACTS OF HOW CHEMICALS ENTER YOUR BODY**

- (a) *In order for a chemical to have any effect on you, you have to come in contact with a chemical in its solid, liquid or gas form. There are four "routes of entry" or paths a chemical can take.*
- (b) *Breathing (Inhalation)*
- (c) *Chemicals can enter through your lungs as you breathe the air around you. Some chemicals can irritate your lungs, nose and throat, like ammonia. Others can be absorbed into your blood, traveling to and affecting the organs in your body. Prolonged exposure to hazardous substances like asbestos and other solid fiber materials can cause serious health problems. Dusts and fibers can become trapped in your lungs causing irritation, scarring and damage.*
- (d) *Regardless of the type of chemical you work with, your first line of defense against breathing in hazardous chemicals is to use an approved respirator.*
- (e) *Through Your Skin (Absorption)*
  - (i) *Although the skin is a very effective barrier to most chemicals, it can be penetrated. Damage to the skin from cuts, scrapes, cracking, dryness or other conditions can allow a chemical to enter into the body. Some chemicals can damage the skin on contact, and others pass through the skin and into your bloodstream. A group of chemical solvents, such as toluene, gasoline and mineral spirits, are absorbed easily through your skin. Some pesticides like parathion can easily pass through the skin, building up to poisonous levels in the body.*
  - (ii) *There are two easy steps which will prevent absorption -- wearing gloves that are chemical resistant, and washing off any chemical that contacts the skin as soon as possible. When you're washing, make sure you use a product designed for washing skin, and not products like paint thinner, turpentine and benzene.*
- (f) *Swallowing (Ingestion)*
  - (i) *A chemical can enter your body if you accidentally swallow it or if your food or drink becomes contaminated. Simply by not washing your hands before you eat after working with chemicals, or eating, smoking or drinking in an area where chemicals are in use, could lead to trouble.*

(g) *Injection*

- (i) Like the shot you get from your doctor when you're ill, chemicals can be accidentally injected into your body. If you work around high pressure equipment of any kind, like compressed air, grease guns, or hydraulic lines, the potential exists for this kind of accident. Be extra cautious around any kind of pressurized spray equipment or high pressure lines, and never use compressed air to clean off your hands, arms or clothing.

**Section 11.15 FOREMEN/SUPERVISORS**

- (a) *Will inspect sites daily for violations and correct them*  
(b) *Will enforce Pyramid Acoustic safety standards and require employees to practice these safety standards*  
(c) *Foremen will report any unsafe working condition to the proper personnel.*

**Section 11.16 EMPLOYEES**

- (a) *Will use common sense*  
(b) *Will be attentive to possible dangers*  
(c) *Will use appropriate personal protective equipment*  
(d) *Will abide by Company rules and regulations*  
(e) *Will question others if something looks or could be potentially be unsafe. If in doubt ask questions.*  
(f) *Employees are encouraged to contact the Safety Director if a safety issue is noted and has not been addressed by the foremen/supervisor.*

**Article XII. JOBSITE INSPECTIONS**

**Section 12.01 THE SAFETY DIRECTOR or other designated individual will make inspections of each jobsite, observe potential safety or health hazards and develop a plan for keeping the Company's employees safe, which may include the following:**

- **Removing the hazard**
- **Guarding against the hazard as required by MIOSHA**
- **Providing personal protective equipment and ensuring its use**
- **Regularly training employees in safe work practices**
- **Coordinating the protection of employees with other companies**
- **If necessary, placing a call to MIOSHA to help in the training process**
- **Records of inspections may be reviewed by the safety committee**

## Section 12.02

### Article XIII. SAFETY DIRECTOR

**Section 13.01** THE SAFETY DIRECTOR is in charge of the safety program at Pyramid Acoustics. The Safety Director reports directly to Company officials. The responsibilities of the Safety Director include:

- Being knowledgeable of potential job hazards
- Ensuring compliance with MIOSHA construction safety standards
- Making regular safety inspections
- Establishing safety procedures
- Conducting regular safety training
- Maintaining safety records
- Continued training of safety practices and procedures
- Understand potential job hazards and how to eliminate them.
- Conduct or assist with Job Safety Analysis.
- Assure compliance with MIOSHA construction safety and health standard requirements.
- Conduct regular job site safety and health inspections.
- Establish safety and health procedures.
- Coordinate regular safety and health training.
- Conduct or assist with Tool Box Talks or Five Minute Safety Talks.
- Maintain documentation of training, inspections, injuries and illnesses, and other safety records.
- Participate in accident investigations and implementation of corrective actions.
- Involve employees in the implementation of the SHMS.
- Create statistical reports that compare severity and frequency rates against prior records.

## **Article XIV. SAFETY COMMITTEE**

**Section 14.01** Our management will take an active role on the safety and health committee. At least annually the safety and health committee will develop written safety and health goals and track monthly progress. These goals will be communicated to all employees. Our committee will be comprised of management and hourly employees. Depending on the size of the company at the time and people available we will seek to staff the committee with the following employees:

- (a) *The Safety Director*
- (b) *A Steel Foreman*
- (c) *A Drywall Foreman*
- (d) *The Field Superintendent*

**Section 14.02** The purpose of the safety committee is to bring employees and the employer together in a cooperative effort to promote safety at each worksite. The intentions of the committee are to make recommendations regarding methods of addressing safety issues. Committee members will assist the Safety Director by keeping an eye on practices and correcting them. Safety Committee meetings will be conducted as needed, with attendance records kept. Attendance records are available for review upon request. Accidents, injury reports, employee eligibility and other safety topics will be reviewed.

**Section 14.03** Another purpose of our safety and health committee is to participate in the implementation of the safety and health system at Pyramid Acoustics, Inc.

**Section 14.04** Our committee will be comprised of management and employee representatives. Our committee will meet periodically. This includes quarterly in Jan, April, July, and September/October. Foreman, the owner or the safety director may call a meeting. If you have safety concerns that are not being address please contact the safety director. You may be asked to participate in the meeting.

**Section 14.05** The committee will:

- (a) *Have defined goals and objectives.*
- (b) *Speak to the spirit of the law*
- (c) *Address safety and health issues.*
- (d) *Review and discuss any new OSHA Law and why it is important and what issue it is really addressing.*
- (e) *Record and post minutes of the meetings.*
- (f) *Involve employees in problem solving.*
- (g) *Document action taken and post on the bulletin boards for all employees to read and-or comment.*
- (h) *Have a formal agenda.*
- (i) *Committee members are: (List members)*

## **Article XV. RESPONDING TO SAFETY AND HEALTH ISSUES**

**Section 15.01** OUR MANAGEMENT will take prompt consistent action when responding to safety and health issues. They will demonstrate our management commitment to addressing safety and health concerns and encourage employee participation. Management will respond to employees' reports of hazards or potential hazards in a timely manner.

**Section 15.02** IMMEDIATE SUPERVISORS WILL REVIEW, INVESTIGATE, and take any necessary and appropriate action on all employee reports of hazards or potential hazards. *The employee reporting the hazard or potential hazard will be notified of the outcome.* Reporting of hazards or potential hazards will be without fear of reprimand.

## Article XVI. MATERIAL SAFETY DATA SHEETS (MSDS)

### Section 16.01 USING AN MSDS:

- (a) *An MSDS provides information the manufacturer of a chemical considers necessary for you, the worker, to determine what chemicals are in a product, and what steps to take to protect yourself when using the products.*
- (b) *Although MSDSs from different sources may look very different, they will contain the same type of information. MSDS may look difficult, and yes, there is a lot of technical language and data, but the information you need to identify, understand, and work safely with a chemical product is fairly easy to find.*
- (c) *MSDSs are divided into sections usually beginning with the chemical and common name of the product. Besides knowing what this product is called, it's important to know who makes it and where to reach the manufacturer. The manufacturer can answer questions about his product and help you if an emergency arises. You will usually find a phone number for the manufacturer in this section.*
- (d) *An important section to look for is usually called "Health Hazards" which tells you how dangerous the product can be, the type of danger it represents, and what happens if you are overexposed to this product.*
- (e) *Equally important is the section that deals with "First Aid." This section will give you some basic steps to take if you or another person are affected by the chemicals in this product.*
- (f) *Another section deals with "Protective Equipment." Here, specific recommendations for safety equipment and procedures are listed. This section tells you how to protect yourself from exposure when working with or near this product.*
- (g) *By taking the time to read the MSDS you have found some important basic information about the chemical(s) you work with, including:*
  - *What's it called*
  - *What's in it*
  - *What happens if the chemical affects you*
  - *What first aid steps to take if exposure occurs*
  - *And, how to protect yourself and work safely with the chemical.*
- (h) *Other sections of a MSDS will tell you what the chemical looks, smells and feels like; how to safely handle and store the chemical; what happens to the chemical in the event of a fire; and what if any exposure limits have been set or recommended for the chemical(s) or product.*
- (i) *More information on MSDS, chemical information references and chemical safety can be obtained by asking your supervisor.*
- (j) *Under the provisions of the Hazard Communication Standard, you have the opportunity to review your company's HCS program, chemical inventory list and copies of MSDSs for chemicals you are working with.*

### Section 16.02 SOLVENTS

- (a) *A solvent in simple language is a liquid that dissolves another substance. In construction, we most often see them as cleaners, degreasers, thinners, fuels and glues.*
- (b) *Solvents are lumped into three main types or classes. Those containing water (aqueous solutions) like liquid forms of acids, alkalis and detergents; those containing carbon (organic solvents) like acetone, toluene and gasoline; and the third group contains chlorine in their chemical makeup and are called chlorinated solvents like methylene-chloride and trichloroethylene.*
- (c) *Solvents can enter into your body in two ways; by breathing or by contact with your skin.*
- (d) *Any solvent you breath (inhalation) can cause dizziness or headache as it affects your central nervous system. If you continue to breath the vapors of a solvent you could develop nose, throat, eye and lung irritation, and even*

*damage to the liver, blood, kidneys, and digestive system.*

- (e) *Solvents on your skin can be absorbed into the body. Because solvents dissolve oils and greases, contact with your skin can dry it out, producing irritation, cracking and skin rashes. Once a solvent penetrates through the skin, it enters into the bloodstream and can attack the central nervous system and body organs.*
- (f) *Like all chemicals, the effect upon you will depend on a number of factors -- how toxic it is, how long you were exposed, your own body's sensitivity, and how concentrated or strong the solvent is.*
- (g) *You can protect yourself from solvent hazards by following a few simple rules:*
- Know what chemicals you are working with.
  - Use protective equipment such as gloves, safety glasses, and proper respirators recommended for that chemical.
  - Make sure your work area has plenty of fresh air.
  - Avoid skin contact with solvents.
  - Wash with plenty of soap and water if contact with your skin and a solvent occurs.
  - If a solvent splashes into your eye, flush with running water for a minimum of 15 minutes, and get medical help.

### **Section 16.03 ACIDS, BASES, ALKALI**

- (a) *Acids and Bases (Caustics) can easily damage skin and eyes. How serious the damage depends on how strong the chemical is, how long contact is maintained, and what actions you take.*
- (b) *Acids and bases can be liquids, solid granules, powders, vapors, or gases. A few commonly used acids include: sulfuric acid, hydrochloric acid, muriatic acid, and nitric acid. Some common bases (caustics) are lye (sodium hydroxide) and potash (potassium hydroxide).*
- (c) *Acids and bases can be corrosive, causing damage to whatever they come in contact with. The more concentrated the chemical the more dangerous it can be. Vinegar is a mild form of acetic acid, and as such, it can be swallowed or rubbed into the skin with no damage, but a concentrated solution of acetic acid can cause serious burns.*
- (d) *Different acids react differently when they contact your skin. Sulfuric acid mixes with water to produce heat; when it contacts your skin, it reacts with moisture, causing burns. Hydrofluoric acid may not even be noticed if it spills on your skin, but hours later, as the acid is absorbed into the muscle tissue, it can cause deep burns that are very painful. Most acids, in a gas or vapor form when you breathe them in, react with the moisture in your nose and throat, causing irritation or damage. Acetic and nitric acids don't react with water, so when these vapors are breathed in, they quickly penetrate into the lungs, causing serious damage.*
- (e) *Bases as a class of chemicals feel slippery or soapy. In fact, soap is made from a mixture of a base (lye) and animal fat. Concentrated bases dissolve tissue easily, and therefore can cause severe skin damage on contact. Concentrated caustic gases like ammonia vapors can damage the skin, eyes, nose, mouth and lungs. Even dry powder forms of bases can damage you when you breathe them in because they react with the moisture in your skin, eyes and respiratory tract.*
- (f) *Cement and mortar are alkali compounds in their wet or dry form. As dust and powder they can cause damage to skin and eyes when they react with moisture in your body. Concrete and mortar can also cause an allergic reaction in people who become sensitive to them. These compounds are abrasive, and can damage your skin by the sandpaper-like quality they possess.*

### **Section 16.04 METALS**

- (a) *We don't usually think of chemicals when we talk about metals, but the fact is that every time we weld, braze, torch cut, solder, grind, polish, coat, finish or drill metals, we may be producing dust, fumes and vapors containing that metal.*

- (b) *The metal in dust, fumes and vapors can easily be deposited in the lungs and then into the blood stream. Although breathing in the dust or fume form of a metal is the most common way for metals to get into your body, you could swallow metal particles or compounds if you smoke, drink, chew gum or eat your lunch in an area where these compounds are present. Some metals like mercury and certain compounds of lead can be absorbed by your skin.*
- (c) **COMMON CONSTRUCTION METALS:**
- (i) **Cadium:** And its compounds can be toxic. A condition called metal fume fever, with flu-like symptoms can occur when small doses are inhaled. In larger doses, cadium inhalation can be fatal. Small repetitive doses can cause kidney damage or lead to emphysema. Welding cadium coated metals is the most common cause of exposure. Adequate ventilation and an approved respirator will protect you.
- (ii) **Nickel.** Exposure to metal dust or fumes containing nickel and nickel compounds can inflame and irritate the skin, causing an itching rash. Inhalation of nickel compounds has been linked to cancer of the lungs and nasal sinuses.
- (iii) **Lead.** Lead exists normally in the body, but can easily build to a level that is toxic. Early signs of lead poisoning -- fatigue, irritability, headache, cramps, stomach pain, loss of appetite -- are likely to be ignored. Continual buildup can damage the nervous system, brain, kidneys and reproductive system. Soldering pipes, casting lead seals and repairing piping are common lead producers; but lead is also found in gasoline, canned food, and most city water supplies.
- (iv) Zinc, Copper, Brass and Magnesium
- (v) Fumes, powders and compounds of these metals are sometimes encountered in welding, brazing, cutting and spray metallizing work. Inhalation of these metals can cause metal fume fever, a flu-like condition, with coughing, shortness of breath, fatigue, fever, chills, profuse sweating, and chest pains.
- (d) *Following a few simple procedures will protect you from metal exposure:*
- (i) -- Know what is in the metals you are working with.
- (ii) -- When dust or fumes are produced, use the appropriate respirator properly.
- (iii) -- Always make sure you have plenty of ventilation.
- (iv) -- Pay attention to personal hygiene and housekeeping. Before eating, drinking and Smoking, wash your hands, and keep your work area separate from you lunch area.

**Section 16.05 CHANGES TO MSDS/SDS FORMAT effective June 1, 2015 - Chemical manufacturers or importers shall ensure that MSDS/SDSs for their products includes the following Sections in order:**

Section 1, Identification;  
 Section 2, Hazard(s) identification;  
 Section 3, Composition/information on ingredients;  
 Section 4, First-aid measures;  
 Section 5, Fire-fighting measures;  
 Section 6, Accidental release measures;  
 Section 7, Handling and storage;  
 Section 8, Exposure controls/personal protection;  
 Section 9, Physical and chemical properties;  
 Section 10, Stability and reactivity;  
 Section 11, Toxicological information.  
 Section 12, Ecological information;  
 Section 13, Disposal considerations;  
 Section 14, Transport information;  
 Section 15, Regulatory information; and  
 Section 16, Other information, including date of preparation or last revision.

**Section 16.06** The Safety Director will be responsible for compiling and maintaining the master MSDS/SDS file. The file will be kept in the job truck or at Job site gang box and online with a UR codes on gang box for online access.

**Section 16.07** Additional copies of MSDS/SDSs for employee use are located at.

**Section 16.08** MSDS/SDSs will be available for review to all employees during each work shift. Copies will be available upon request to the supervisor or safety director.

**Section 16.09** If a required MSDS/SDS is not received, the supervisor/ foreman will notify the safety director and he shall contact the supplier, in writing, to request the MSDS/SDS. If an MSDS/SDS is not received after two such requests, The Safety Director shall contact the MIOSHA's Construction Safety and Health Division at (517) 322-1856 or General Industry Safety and Health Division (GISHD) at (517) 322-1831, for assistance in obtaining the MSDS/SDS.

**Section 16.10** The MIOSHA program does not maintain a library of MSDS/SDSs. However, either of the above divisions will assist an employee in obtaining a copy of an MSDS/SDS by contacting the employer or supplier.

#### **Section 16.11 Further Explanation of MSDS/SDS**

For decades, the material safety data sheet (MSDS) has been the back-bone of OSHA's Hazard Communication Standard (HCS). As most safety professionals know by now, the Hazard Communication Standard has been revised by OSHA to align with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), the result of which will include substantial changes to the MSDS.

*Note: OSHA is referring to the pre-revision HCS as HazCom 1994, and referring to the post-revision HCS as HazCom 2012.*

##### **(a) An SDS is an MSDS**

Based on the MSDS provisions in HazCom 1994, there are currently a number of different MSDS styles and formats in use in the United States, the most common being the 8 section OSHA MSDS and the 16 section ANSI standard MSDS. OSHA's adoption of GHS via HazCom 2012, on the other hand, mandates the use of a single GHS format for safety data sheets, a format which features 16 sections in a strict ordering.

Another change, thanks to GHS, is the renaming of material safety data sheets from MSDSs to simply safety data sheets, or SDSs.

Unfortunately, this dropping of the M has caused more consternation than is warranted. The truth is, an SDS is an MSDS, they are really the same thing, especially in terms of the role they play in the HCS. In fact, the GHS SDS format is nearly identical to the ANSI Standard 16 section MSDS – with a couple of modifications.

One question a number of safety professionals have asked is, "Will we have to have two safety data sheet libraries – one for MSDSs and one for SDSs?" The answer is no. During the transition to HazCom 2012, employers should expect their MSDS library will have a mix of non-GHS formatted and GHS formatted safety data sheets until the transition is complete and chemical manufacturers have reclassified all of their chemicals using GHS criteria and updated all of their chemical documents.

However, employers should expect and prepare for all of their MSDSs to be replaced with GHS formatted SDSs in the next couple of years. For employers with hundreds or thousands of chemicals, or many facilities with lots

of binders...this will likely be a major undertaking. Employers should also consider how they would like to handle the outdated safety data sheets.

While there are no provisions in HazCom 2012 that require the archiving of older MSDSs, it is a best practice that can be easily done using an electronic system. In fact, an electronic system will make the entire switch over to HazCom 2012 easier.

**(b) What Are the 16 Sections of an SDS?**

As mentioned above, the GHS formatted SDS has 16 sections as follows (source: [OSHA SDS Quick Card](#)):

- (i) **Section 1, Identification** includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
- (ii) **Section 2, Hazard(s) identification** includes all hazards regarding the chemical; required label elements.
- (iii) **Section 3, Composition/information on ingredients** includes information on chemical ingredients; trade secret claims.
- (iv) **Section 4, First-aid measures** includes important symptoms/ effects, acute, delayed; required treatment.
- (v) **Section 5, Fire-fighting measures** lists suitable extinguishing techniques, equipment; chemical hazards from fire.
- (vi) **Section 6, Accidental release measures** lists emergency procedures; protective equipment; proper methods of containment and cleanup.
- (vii) **Section 7, Handling and storage** lists precautions for safe handling and storage, including incompatibilities.
- (viii) **Section 8, Exposure controls/personal protection** lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).
- (ix) **Section 9, Physical and chemical properties** lists the chemical's characteristics.
- (x) **Section 10, Stability and reactivity** lists chemical stability and possibility of hazardous reactions.
- (xi) **Section 11, Toxicological information** includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
- (xii) Section 12, Ecological information\*
- (xiii) Section 13, Disposal considerations\*
- (xiv) Section 14, Transport information\*
- (xv) Section 15, Regulatory information\*
- (xvi) **Section 16, Other information**, includes the date of preparation or last revision.

\*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15(29 CFR 1910.1200(g)(2)).

Additional information on the use of GHS formatted SDSs in HazCom 2012 is available in [Appendix D](#) of the HazCom 2012 regulatory text.

**(c) How to Manage the Transition to HazCom 2012**

The bulk of the heavy lifting during the transition to GHS belongs to the chemical manufacturers and distributors. However, employers have a few key obligations related to SDSs that they will need to stay on top of. The good news is that with a solid strategy in place, employers should be able to not only maintain compliance, but also make considerable improvements to their HazCom Programs.

The first thing employers should do is make sure they understand the compliance deadlines laid out under HazCom 2012. There are four key deadlines:

- (i) *December 1, 2013* – By this date, employers must train employees on how to read GHS formatted labels and SDSs. Changes to labels are probably more substantial, however, employees need to understand where to find information on the SDS, especially in section 2 where critical hazard information is located.
- (ii) *June 1, 2015* – By this date, chemical manufacturers and distributors should have completed their reclassification of chemicals and be shipping GHS formatted SDSs and labels with their shipments. By this time too, a majority of your library will have turned over.
- (iii) *December 1, 2015* – Distributors have an additional 6 months beyond the June 1, 2015 date to pass along manufacturer labels and SDSs in the older formats. However, beyond December 1, 2015, all SDSs and labels in the U.S. should adhere to HazCom 2012 provisions.
- (iv) *June 1, 2016* – By this date employers should be fully compliant with HazCom 2012. That includes making any necessary updates to their HazCom program, training employees on any newly identified chemical hazards (identification of new hazards is likely during the reclassification process chemical manufacturers undertake), and updating safety data sheets libraries and secondary labels.

Looking at the deadlines, one key obligation that employers have, which hopefully jumped out for you, is that incoming SDSs will need to be checked against the older MSDSs to see if there are any new hazards or precautions. Why? It's likely that some of the chemicals you've used for years, on which all of your employees have already been trained, will by the end of the transition have new hazards or changes to handling recommendations that will require updated training. As you know, employees must be trained on all of the hazards of the chemicals to which they are exposed.

To comply, it will help if you have a system in place for catching new changes to safety data sheets. For example:

1. Have a designated employee in charge of the transition to GHS
2. Make sure your employees, especially those on the front lines in procurement and the loading dock (where MSDSs are likely to first enter the facility), are on the lookout for updated SDSs
3. When a new safety data sheet comes in – have a system in place for comparing it to the earlier version, making note of any relevant changes
4. Plan/execute training
5. Update your MSDS library / archive old MSDS

As mentioned earlier, an electronic MSDS management system can be a great resource during this time. A great system gives easy access to millions of MSDSs and tools for managing them; flags SDSs in the GHS format;

kicks out inventory reports; offers container tracking across the facility with mobile barcode scanning; checks chemicals and ingredients against various hazardous substance lists; provides chemical banning and approval tools, is sustainable, cloud-based, and has a high ROI paired with a low cost of ownership.

Going forward, whether called an MSDS or an SDS, safety data sheets will continue to be the back-bone of HazCom compliance. What you do now to prepare for the document churn will likely set the table for success or frustration over next several years. Big changes are coming, but that doesn't mean it has to be a big problem.

**Article XVII. EMPLOYEE INFORMATION AND TRAINING**

**Section 17.01** The safety Director shall coordinate and maintain records of employee hazard communication training, including attendance rosters.

**Section 17.02** Before their initial work assignment, each new employee will receive hazard communication training. This will include the following information and training:

**Section 17.03 INFORMATION:**

- (a) *The requirements of the MIOSHA Hazard Communication Standard*
- (b) *All operations in their work area where hazardous chemicals are present*
- (c) *Location and availability of the written hazard communication program, the list of hazardous chemicals, and the MSDS/SDS*

**Section 17.04 TRAINING:**

- (a) *Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area;*
- (b) *The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;*
- (c) *Measures the employees should take to protect themselves from these hazards;*
- (d) *Details of the hazard communication program-- including an explanation of the new label elements [product identifier; signal word; hazard statement(s); pictogram(s); and, precautionary statement(s)] on shipped containers and the workplace labeling system used by their employer; the new SDS format/sections; and,*
- (e) *How employees can obtain and use hazard information*

**Section 17.05 THE EMPLOYEE SHALL BE INFORMED THAT:**

- (a) *The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.*
- (b) *As an alternative to requesting an MSDS/SDS from the employer, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517) 322-1856, or the MIOSHA General Industry Safety and Health Division at (517) 322-1831, to obtain the desired MSDS/SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.*

**Section 17.06** Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training.

## **Article XVIII. MULTI-EMPLOYER WORKSITES -- INFORMING CONTRACTORS**

**Section 18.01** If our company exposes any employee of another employer to any hazardous chemicals that we produce, use, or store, the following information will be supplied to that employer:

- (a) *The hazardous chemicals they may encounter.*
- (b) *Measures their employees can take to control or eliminate exposure to the hazardous chemicals.*
- (c) *The container and pipe labeling system used on-site.*
- (d) *Where applicable MSDS/SDSs can be reviewed or obtained.*

**Section 18.02** Periodically, our employees may potentially be exposed to hazardous chemicals brought on our site by another employer. When this occurs we will obtain from that employer information pertaining to the types of chemicals brought on-site, and measures that should be taken to control or eliminate exposure to the chemicals.

**Section 18.03** It is the responsibility of Job Foreman to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. To ensure that this is done the following mechanism will be followed: List all method(s) used to ensure the required information is provided or obtained.

## **Article XIX. PIPES AND PIPING SYSTEMS**

**Section 19.01** Information on the hazardous contents of pipes and piping systems will be identified by: List means of identification for pipes and piping systems (i.e., label, sign, placard, written operating instructions, process sheet, batch ticket, etc.). Natural gas, steam and compressed air lines (with pressures exceeding 25 psig) must be identified in all industrial facilities. ANSI A13.1-1981 recommends the following colorations: blue for low-medium pressure oxygen and compressed air lines, yellow for variable-high pressure oxygen and compressed air lines, and yellow for acetylene and natural gas lines.

## **Article XX. LIST OF HAZARDOUS CHEMICALS**

**Section 20.01** [A list of all hazardous chemicals used by Pyramid Acoustics is located at the gang box and posted with an UR code.](#) Further information regarding any of these chemicals can be obtained by reviewing its respective MSDS/SDS.

**Section 20.02** Materials which can be purchased by the ordinary household consumer, and which are used for the intended purpose and amount as by the ordinary household consumer, are not required to be included in this list. (It is suggested that you maintain a separate list of all materials you consider to be "consumer use" materials.)

## Article XXI. FIRST AID/CPR

**Section 21.01** In order to ensure immediate response to emergency situations, the Company will provide First Aid and Basic Adult CPR and AED training to all foremen and field employees who are interested. Foremen/lead men personnel are required to maintain their First Aid/Adult CRP certifications at all times. To assist in this, Pyramid Acoustics will offer these classes. The cost of the class is covered by Pyramid Acoustics with a passing grade. Failure to pass the class will result in the cost of the class to be reimbursed by the employee. Class time spent in obtaining these certifications will not be paid for/reimbursed by Pyramid Acoustics. If certification class is done outside of the classes offered by Pyramid Acoustics then the employee will incur all expenses without reimbursements from the company.

**Section 21.02** All non-foremen/lead men personnel that are interested in participating in these classes, are encouraged to do so upon space and availability, with the same pass/fail qualifications as the foremen/lead men personnel.

**Section 21.03** Employees who do not successfully complete the course are encouraged to re-take the course on their own time and expense. Review pages are located in our MSDS books to all those who wish to keep up on their training. These pages are available upon request. Failure to maintain a CPR and First Aid certification will be reflected in performance reviews.

## Article XXII. PERSONAL PROTECTIVE EQUIPMENT

**Section 22.01** Each employee will be furnished, at no charge, the following personal protective equipment:

**Section 22.02** Safety glasses (two pair per year)

**Section 22.03** Hard hat (replaced as necessary) Hard hats will be worn on job sites at all times.

- (a) Replacement equipment must be purchased from the office or the supervisors. If equipment is damaged despite proper usage, replacements will be provided.
- (b) Head injuries can cause loss of memory, speech, vision, or other problems. 12,000 disabling head injuries occur each year at work. That's 300 per day! Most could have been prevented by wearing hard hats. **Company policy is as follows: hard hats will be worn at all times while on the site!**
- (c) **Safety glasses will be worn every time a power tool is being used, or when a possibility of an eye injury exists,** or potentials of hazards from flying objects or particles, chemicals, arcing, glare, or dust such as demolition work or other work that creates flying particles. If prescription safety glasses or frames and lenses are required by an employee to perform his/her task, then this will be done at the expense of that employee. According to optical specialists, eye exams should be done every two years. In the event that safety glasses are damaged or scratched up where seeing becomes difficult, please get a new pair immediately.
- (d) Protective gloves and clothing shall be worn when required to protect against a hazard. Use common sense. Leather work boots shall be worn to protect from falling objects, chemicals, or stepping on sharp objects. Safety toe footwear may be necessary in some instances. Athletic or canvas-type shoes shall not be worn.
- (e) Footwear must be leather, work-rated boots. Steel toes are not required, but are recommended. (note: some contractors insist on wearing steel toe shoes.
- (f) First Aid kits and ear plugs will be located in job trailers, tool boxes, and Company vehicles. Respirators and hard hat chinstraps are available at employee's expense unless deemed necessary by Pyramid Acoustics for a specific job-related task.

*Project owners or general contractors hold the right to enforce the use of any additional Personal Protective equipment or other safety related regulations they deem necessary. Our primary goal is to please the customer; however all of Pyramid's rules are still in effect. In general the stricter shall be observed. All reasonable requests by the general contractor shall be observed. In the event of working in a hospital, lab, food and drug manufacturing or processing where a sterile field shall be observed all rules and procedures of the owner/contractor shall be observed strictly. If the employee is asked to do something that puts himself in danger then he or she shall contact the supervisor for Pyramid Acoustics or secondly, if the supervisor is not available, the office. Failure to comply with the contractor or owner's simple and reasonable requests regarding safety and protecting the integrity of their systems exactly may likely lead to termination forthwith.*

**Article XXIII. FALL PROTECTION**

**Section 23.01** Fall protection is very important to avoiding serious injuries. For Pyramid Acoustics, fall protection means using:

- (a) *Personal fall arrest systems such as roof cable systems*
- (b) *Self-retracting lanyards when erecting trusses*
- (c) *Guardrails*
- (d) *Positioning devices such as plywood or other hole coverings*
- (e) *Working off elevating work platforms such as man lifts, picks, or OSHA approved Pettibone cages*
- (f) *Visual borders*
- (g) *An employee should not work at heights they are not comfortable with.*
- (h) *Roof cable systems and harnesses must be used when working within 6 ft. from any unprotected roof edge.*
- (i) *Employees doing initial connections (trusses, purlins, etc.) must use fall protection, such as beam walkers, or fall restraints such as lanyards at heights greater than 30 ft. above a lower level or ground. In cases of other job specific dangers, working over industrial machinery for example, fall protection is required. If any other work is performed 6 ft. or more above a lower level or the ground, fall protection must be used. Roof borders must be placed no less than 6 ft. from each exposed edge and marked with flags or other highly visible material. The minimum height for fall protection, as of January 1, 2002, is 6 ft.*

## Article XXIV. SCAFFOLDING

**Section 24.01** Scaffolding must be equipped with guardrails, mid-rails, and toe boards if it is 10' or taller, and must be in safe working condition. If guardrails are not used on scaffolding, the area where work is being performed *must be bordered with caution tape*. Anyone other than those using the scaffold must not enter. Any time that a scaffold is 10' or taller, an extension ladder must be used to access the platform.

**Section 24.02** **Perry scaffolding is to be used in accordance with MIOSHA regulations: Mobile Scaffolding**

- (a) *When free-standing, mobile scaffolding is used, the height shall not be more than 4 times the minimum base dimension.*
- (b) *Outriggers should be used when stacking perry scaffolding and may be considered as part of the base dimension.*
- (c) *All floors must be clean of debris, holes, pits, and cannot be on more than 3 degrees of level.*
- (d) *All tools and material must be secured or removed before scaffolding can be moved.*
- (e) *Scaffolding is equipped with guardrails on all sides when platform is higher than 4 ft.*
- (f) *Scaffolding brakes must be applied after a move has been completed. Personnel are not allowed to ride on scaffolding unless guardrails are in place, obstructions are cleared and an additional employee is guiding the scaffolding. The person that is pushing the scaffolding needs to alert them before moving them.*

**Section 24.03** **The use of common sense is a must when maintaining safe work practices and procedures.**

- (a) *Ladders which are used to enter or exit onto another level must extend 3ft. above the working surface and be secured at the top. Step ladders must be used in the fully extended position. Step ladders are not to be used in any other way than what a step ladder is designed for. Defective ladders should be taken out of commission and replaced immediately. Areas around the top and bottom of the ladder should be kept clean to avoid tripping. Ladders should be placed at an angle of 1' of base for every 4' of height. An easy way to check is to put your feet at the base of the ladder; your finger-tips should be nearly touching the ladder when your arms are fully extended in front of you.*
- (b) *Danger areas such as floor openings, wall openings, etc. must be protected by guardrails or covers and be marked with caution tape or other highly visible material. Rebar must be capped or bent over to avoid impalement. If other potential fall hazards are noticed, use common sense and inform the Safety Director so that the issue may be addressed.*

## Article XXV. HAND AND POWER TOOLS

**Section 25.01** Hand and power tools must be kept in safe working condition. All damaged tools should be tagged and taken out of commission to be repaired or replaced. When power tools are designed to have guards, the guards must be used. Do not use power tools that you are unfamiliar with. Power tools should be used correctly (Ex: cut away from body, clamp materials, etc.). Gas powered equipment should not be used in unventilated areas. Electric tools must be unplugged before changing bits and chucks, or making minor adjustments/repairs. Company-owned tools are the responsibility of the employee to whom they are entrusted. Keep tools locked up when not in use. \*As noted earlier, safety glasses will be required when using any power tool.

**Article XXVI. EQUIPMENT-PETTIBONES, FORKLIFTS, ETC.**

**Section 26.01** Equipment must be operated only by trained and licensed persons. Permits, other than those required by the state, can be obtained through the office.

**Section 26.02** Harnesses must be worn at all times when operating a boom lift. Only the operator may ride equipment unless proper seating is provided. The equipment used to lift personnel such as pettibone cages, or man lift baskets which are fully enclosed by guardrails, midrails, and toekicks, must be OSHA approved. All other cages may be used only to carry materials or supplies. All personnel must exit the cage after being lowered down to the ground before moving the pettibone cage to another location.

**Section 26.03** Employees are not to stand on or climb outside of the railings of any elevating work platform/lift.

**Section 26.04** If any flaws affecting the safe operation of equipment are noticed, that equipment must be tagged, recorded, and repaired by a qualified person before being used. Do not disconnect warning alarms on any equipment.

**Article XXVII. VEHICLES**

**Section 27.01** Company vehicles must be operated only by licensed employees to whom they are issued. Persons riding in the vehicles must sit in a seat designed for that purpose and seat belts must be worn at all times. When transporting supplies that extend more than 5 ft. in front of or behind a vehicle, the supplies must be marked with red caution tape. Never overload a trailer and be sure to secure any loads being hauled. Practice safe driving habits, obey the traffic laws, and drive defensively. It is also the policy of Pyramid Acoustics to maintain a clean vehicle as much as possible.

**Article XXVIII. HOUSEKEEPING**

**Section 28.01** Employees are to practice good housekeeping. A clean jobsite is a safe jobsite. Jobsites are a reflection of the Company. Use proper waste disposal services and regularly clean up the site. Cleaning includes scraps of drywall, steel, grid, ceiling tile, lunch debris and all other material waste are to be disposed of at the end of the day. We will not tolerate debris lying around to be a hazard for us or anyone else. Extra material is to be managed so that it does not conflict with safety or productivity.

**Article XXIX. EMPLOYEE CONDUCT**

**Section 29.01** Each employee is responsible for his/her conduct. While on the jobsite, employees are prohibited from engaging in unsafe activities, including, but not limited to, the following:

- (a) *Possession of drugs, alcohol, and/or firearms*
- (b) *Careless operation of equipment or vehicles*
- (c) *Threatening behavior*
- (d) *Horseplay*
- (e) *Distracting fellow employees*
- (f) *Engaging in any acts which might endanger another employee*

**Section 29.02** Appropriate clothing should be worn. Anything that can be seen as offensive should not be worn. Remember, you are representing the Company as well as yourself. It is the policy of Pyramid Acoustics that no shorts are to be worn unless prior permission has been given. Tee-shirts must have a collar on them as well as sleeves. These may not be cut off for any reason while working.

## **Article XXX. DISCIPLINARY ACTIONS**

**Section 30.01** Each employee needs to comply with the safety rules pertaining to his/her specific job and to the general safety rules of the Company. Any employee who fails to follow the training and rules for safety and health will be disciplined to the extent possible under given circumstances. The Company will follow a policy of progressive discipline for unsafe conduct and related matters. Therefore, the Company will attempt to resolve such problems first by oral warnings, with documentation and generally followed progressively by suspension, termination or other appropriate remedies, as needed. Nevertheless, at any time and according to its sole discretion, the Company reserves the right to not follow any progressive discipline whatsoever and to utilize any form of discipline it deems appropriate, including immediate termination.

*(a) 1<sup>st</sup> Offense*

(i) Verbal warning:

(ii) The incident is discussed between the employee and the Safety Director. A record of the meeting is prepared by the Safety Director, reviewed by the safety committee, signed by the employee and placed in the employee's personnel file.

*(b) 2<sup>nd</sup> Offense*

(i) Written warning:

(ii) The incident is discussed between the employee, foreman, and the Safety Director. A record of the meeting is prepared by the Safety Director, reviewed by the safety committee, signed by the employee and placed in the employee's personnel file.

*(c) 3<sup>rd</sup> Offense*

(i) Suspension without Pay:

(ii) The employee is suspended without pay for a day and a written violation/warning will be issued and recorded. This will be signed by the employee and placed in the employee's personnel file. The employee may incur more days off or termination at the discretion of the management team, depending on the severity of the offense.

*(d) 4<sup>th</sup> Offense*

(i) Termination:

(ii) Termination of an employee may be immediate or be preceded by written warnings or longer suspensions without pay. Each action will also be recorded, signed by the employee and put into his/her file.

**Section 30.02** Employees will each be held responsible for using appropriate personal protective equipment and using fall protection. If fall protection is not provided, request it from the supervisor. Additional jobsite violations, correctable by foremen or supervisors, will be addressed by the Safety Director. If the problem continues, it will be brought to the attention of Company executives and they will handle discipline or corrective actions. \*Disciplinary steps will apply for one calendar year, with a fresh start each January. \*This policy does not change an employee's "at will" status.

## Article XXXI. REPORTING ON-THE-JOB ACCIDENTS AND NEAR MISSES

**Section 31.01** Any employee involved in a job related accident resulting in either a injury, non-injury or “near-miss” incident, must notify the Safety Director immediately to ensure coverage provided under the Worker’s Compensation Act.

**Section 31.02** An [accident report](#) must be completely filled out and signed by the employee and the employee’s supervisor, then submitted to the Safety Director within 24 hours of the accident and/or incident.

**Section 31.03** Injuries requiring professional care or accidents involving Company equipment must be reported to the Safety Director immediately. [The Safety Protocol standard](#) must be followed as to ensure proper care and communication for the benefit of the employee; this is located in the MSDS book. It is the responsibility of both the employee and the supervisor to do the following:

- (a) Administer and/or obtain proper medical care for the injured person(s).
- (b) Call 911 or the appropriate medical response team
- (c) Note the time of the accident as well as changes in status of the injured and when first aid attention is given as well as major changes in treatment such as using an AED or a tunicat or the loss of a digit or extremity.
- (d) Report all accidents and/or incidents to the Safety Director immediately, regardless if medical treatment is needed or not
- (e) If professional medical treatment is needed, a phone call will need to be made to the Safety Director to ensure that medical treatment will be authorized under the Worker’s Compensation Act. If the Safety Director is unavailable, the Company’s Management will be able to authorize treatment as well.
- (f) Complete the [accident/incident form](#) and return it to the office within 24 hours of the accident/ incident. Copies of an accident/injury [form can be found at the following locations](#):
  - (i) Nearest first aid kit –in the job box on site or in a foreman’s truck on site
  - (ii) Supervisor’s vehicle – if there is not a job trailer
  - (iii) In the back of your safety policy book – given at orientation

## Article XXXII. WELDING/BURNING PERMITS

**Section 32.01** Employees must have their welding/burning certification present at all times. Certifications can be obtained from night courses. Pyramid Acoustics will pay for these courses, however the class time will not be paid to the employee. It is important to be familiar with the equipment and how it works. While welding or torching, there should be adequate ventilation. Respirators must be used in certain cases. A fire extinguisher will be readily accessible. It is necessary to wear safety glasses when cutting or torching and welding masks when welding. Never torch or weld near flammable or combustible containers.

**Section 32.02** Oxygen and acetylene tanks must be handled with care. Don’t roll them. Tanks not in use must have their caps on and they must be stored vertically and secured in place. The area below any welding or burning must be barricaded to ensure that other employees are not exposed. A fire watch must be maintained for ½ hour after any cutting or welding when there is a possibility of a smoldering fire. Oxygen and acetylene tanks must be stored at least 20 ft. apart when not in use.

## **Article XXXIII. ACCIDENT PREVENTION PROGRAM**

**Section 33.01** Employees will receive, at a minimum, monthly training for specific safety related issues. Employees will sign an acknowledgement verifying that they have received the training, understand the training and agree to follow rules regarding the issue(s) discussed. Foremen and supervisors will be included in this training, and may receive additional training as required. New employees will receive a basic overview of safety procedures at orientation. Employees will also be informed of harmful plants, reptiles, animals, or insects that they may encounter in their workplace.

## **Article XXXIV. ELECTRICAL SAFETY**

**Section 34.01** Electrical safety involves two primary issues:

- (a) *Power lines,*
- (b) *Temporary and permanent electrical wiring and equipment.*

**Section 34.02** To avoid electrical incidents, several basic safety rules must be followed:

- (a) *Stay at least 10 feet back from power lines, in ALL directions. Stay further back if voltages are greater than 50,000 volts*
- (b) *Do not store materials under power lines.*
- (c) *Mark power lines on the job site with warning signs below.*
- (d) *Use ground fault circuit interrupters (GFCI) whenever plugging into temporary power or using an extension cord.*
- (e) *Extension cords and trailing cords with missing ground prongs must be removed from service.*
- (f) *Extension cords and trailing cords with cuts must be removed from service.*
- (g) *Do not operate wet power tools.*
- (h) *Keep extension cords from being damaged in doorways or being run over.*
- (i) *Keep extension cords out of wet areas.*
- (j) *Never wire anything yourself or attempt to make electrical repairs. Leave that for an electrician.*
- (k) *Assume all wires and electrical boxes are live, unless you are certain they are not.*
- (l) *Do not store any materials within 3 feet of electrical boxes.*

**Section 34.03** Careful monitoring and proper procedures are necessary to avoid electrical burns and electrocutions. 9% of work-related deaths are a result of electrocutions. Never work within 15 feet of live power lines. Temporary power must conform to the National Electric Code and meet local regulations.

**Section 34.04** Extension cords may not be damaged (cut, frayed, burned) and must be equipped with a ground. If cords are damaged, they are to be taken out of service and replaced or fixed by a trained employee. GFCI's should be used on each cord run to prevent over-current. All cords should be checked daily for damage.

**Section 34.05** Tools should not have damage to the cord or internal damage and must be grounded and/or double insulated. In cases of extremely wet conditions, rubber gloves and rubber-soled boots are recommended.

**Section 34.06** When doing extension cord inspections, cords may not be fixed on site without the supervision of a licensed electrician. However, the cords may be fixed off site by a trained Pyramid employee at the warehouse.

**Article XXXV. CRANE SAFETY**

**Section 35.01** Crane operators are to be authorized personnel and be properly trained. Unauthorized personnel are prohibited from entering the crane. No modifications are to be made to the crane. Operators must comply with the crane specifications and limitations. A crane should not be left unattended while loads are suspended.

**Section 35.02** The crane should be inspected daily for flaws. Monthly and yearly inspections must be made with written records kept.

**Section 35.03** Proper lifting devices such as straps, cables, chains etc. must be used. Employees should never walk underneath a suspended load. It is important that straps, chains, or other lifting devices be checked for wear before each use. Do not use lifting devices if they appear to be damaged. Man-lifting devices such as a "lift seat" may be used only as a last resort. The Safety Director must be contacted prior to the lift seat being used. Ball-rides are strictly prohibited!

**Article XXXVI. TRENCHING/EXCAVATIONS**

**Section 36.01** Pyramid Acoustics does not perform their own excavations; therefore, the following information is meant only to be an informative section and to provide knowledge to exposed employees so that they may be able to spot hazards. Employees should not enter a trench that is 5' or more in depth without the authorization of a supervisor.

**Section 36.02** An excavation is any man-made cut, cavity or trench in the ground formed by earth removal. Verify the location of underground lines and cables by first contacting the proper utility providers. If the location is still unclear, probing or hand excavation should be used to determine the location of such lines and cables. In a case where a power line or cable is exposed, contact the local authorities and evacuate the area.

**Section 36.03** Slope or Shore - The proper slope must be used if the excavation is more than 5 feet deep, or where employees are exposed to the danger of moving ground.

**Section 36.04** An employee should not work in a trench where water is accumulating. Excavated earth or loose materials should be stored 2 feet or more from the excavation. Trench supports should be used in a trench that is 5 feet or more in depth and a ladder or earth ramp should be located within 25 feet for quick exiting.

**Section 36.05** Always be sure that the power shovel, truck, or dozer operators can see you at all times.

**Article XXXVII. PERIMETER GUARDING FLOOR, WALL, AND ROOF OPENINGS/ SIGNS**

**Section 37.01** A roof perimeter must be bordered with roof sanctions and highly visible flags while employees are working on a roof. All roof borders must be 6' back from leading edge work.

**Section 37.02** When doing any overhead construction, including rafter connections, purlins, joists, girts, etc., signs need to be posted stating that overhead construction is in progress and persons entering the area should proceed with caution.

**Section 37.03** While doing conventional steel decking, the area below construction must be roped off and a sign posted stating that overhead construction is in progress and that others may not enter the area.

**Section 37.04** Floor, wall, and roof openings should be marked with caution tape or guardrails, or covered with a covering strong enough to withstand at least twice the maximum pressure than might be applied to it. These coverings must be labeled "hole" or "cover."

**Section 37.05** Stairs with three or more risers must be equipped with a handrail 30-37 inches above the stair, in line with the riser. Signs stating "hard hat area," "caution," "do not enter," and "overhead danger" must be posted when appropriate.

**Article XXXVIII. FIRE PROTECTION**

**Section 38.01** It is important to spot fire hazards, to know where fire protection is located and how to use it. Fire extinguishers are located in Company vehicles and trailers. They must be certified and marked up to date by a trained inspector.

**Section 38.02** When welding or torching near any possible fire hazard, an extinguisher must be close at hand.

**Section 38.03** When working in an existing building of another company, be familiar with their fire emergency evacuation plan and procedures, and where their fire extinguishers are located.

## **Article XXXIX. EMERGENCY PROCEDURES, RESCUE, AND EVACUATION**

**Section 39.01** While working in another company's building, be familiar with their emergency evacuation procedures. In case of an emergency, use the following procedures:

- (a) *Secure the area – eliminate immediate danger.*
- (b) *Call the appropriate emergency personnel (fire department, ambulance, etc.).*
- (c) *Administer proper First Aid or CPR.*

Do not move a seriously injured person, unless absolutely necessary.

- (d) *After these steps are taken, contact the Safety Director. If you are a witness to an accident and you intend to help, assess the situation before offering assistance. Do not endanger yourself; it does not help to have two injured people as a result of attempting to help one injured person. Don't panic; remain calm but act efficiently.*
- (e) *In case of a weather emergency, proceed to a safe place such as a ditch or hallway.*
- (f) *In case of a fire in the building you are working, employees should exit the building by the nearest exit and meet at the designated area communicated from the job site foreman. There will then be a count taken to account for each person and ensure full evacuation.*
- (g) *If you are in the West Michigan area, dial 9-1-1 for emergencies. [Emergency numbers must be posted along with the site location.](#) Employees with cellular phones, USE THEM.*

## **Article XL. TOXIC SUBSTANCES**

**Section 40.01** Toxic substances can be described as substances that are ignitable, corrosive, reactive, poisonous, or other dangerous materials. It is important that all personnel know the MSDS procedures for all chemicals prior to using them. If this information is not available on site, contact the job supervisor or safety director before using unfamiliar materials. If you come into contact with a toxic substance, do the following:

- (a) *Rinse immediately*
- (b) *Get fresh air*
- (c) *Remove contaminated clothing*

**Section 40.02** Check with Material Safety Data Sheets (MSDS) for further procedures. Be aware of dangerous materials, their hazards, and the precautionary procedures involved in protection. Toxic substances should be listed in the MSDS binder. If not listed, contact the Safety Director and proceed with caution.

**Section 40.03** While handling toxic substances, be sure to take the following precautionary measures:

- (a) *Know the MSDS information and safety procedures prior to engaging activities.*
- (b) *Splashes – wear safety glasses*
- (c) *Inhalation – use respirator*
- (d) *Hand contact – wear gloves*

**In case of a major spill or serious contact, use the steps outlined in the Emergency Procedures section.**

## Article XLI. CONFINED SPACES

**Section 41.01** Pyramid Acoustics does not perform its own confined space work with the exception of shaft walls. Therefore, the following information is meant only to be an informative section and to provide knowledge to exposed employees so they may be able to spot hazards. If necessary, Pyramid Acoustics will hire a company that specializes in confined space work.

**Section 41.02** Confined spaces are locations that present the potential danger of entrapment, engulfment, or atmospheric conditions. These locations have limited or restricted means of entry and exit, are large enough for an employee to fully enter, and are not designed for continuous occupancy by an employee.

**Section 41.03** Confined spaces include underground vaults, tanks, storage bins, pits, diked areas, vessels, silos, etc. Pyramid Acoustics must inform all employees of the existence and location of such confined areas, and the potential dangers involved.

**Section 41.04** Around such spaces, signs must be posted stating “Danger: Permit Required”, “Confined Space”, “Do Not Enter.” If you encounter a job that involves entering a space that fits the description listed above, DO NOT ENTER IT, and contact the Safety Director. The space should be blocked so that others cannot enter it.

## Article XLII. LOCKOUT/TAGOUT

**Section 42.01** Pyramid Acoustics does not perform work on machines that require the use of a Lockout/Tagout program. Therefore, the following information is to inform exposed employees so they may be able to identify hazards. Supervisors must verify that equipment is locked out or tagged out when employees are working above or around dangerous machinery.

**Section 42.02** Lockout/Tagout safeguards employees from hazardous energy while they are performing service or maintenance on machines and equipment, or while working near or above machinery. It covers the unexpected start-up of machinery. Make certain that when the possibility of unexpected start-up exists, the equipment is isolated and energy sources are assured as inoperable prior to service. The steps to be taken are as follows (examples in parenthesis):

- (a) *Shut down equipment (turn it off)*
  - (b) *Isolate equipment from energy sources (unplug it)*
  - (c) *Apply lockout/tagout device*
  - (d) *Release any stored energy (like a hose - after water is turned off; release the pressure)*
  - (e) *Verify the isolation (try to turn it on)*
- (i) The lockout/tagout must not be removed by anyone other than the person who applied it. Tags must be legible, understandable, and strong enough to withstand their surrounding environment (can not be accidentally detached).
  - (ii) \*The lockout/tagout will usually apply when working in another company's existing building, around their machines and presses. If possible, ask their employees to implement their lockout/tagout when you are working near their machines. If they will not, or cannot, inform the supervisor of the situation.

### **Article XLIII. BLOODBORNE PATHOGENS**

**Section 43.01** A universal precaution to ensure safety is to approach all human blood and bodily fluids as if they are infected with HIV, Hepatitis B, or other blood borne pathogens.

**Section 43.02** Gloves must be worn when employees come into contact with blood. Do not handle bloody clothing without gloves on. If a person does come into contact with blood, wash hands as soon as possible. In case of blood contact, a Hepatitis B shot should be received. Confidential records will be kept for each exposed employee. Records of training will be kept for three years.

### **Article XLIV. SAFETY AND HEALTH TRAINING**

**Section 44.01** (Pyramid Acoustics, Inc.) will provide training to assure the requirements of MIOSHA standards are met and continuously evaluate employee training needs to keep workers safe and healthy on the job.

- (a) 1. *New Employee Orientation: New employees will receive training on the company safety and health management system, safe work practices and expectations, and specific safety and health training for the tasks that they will perform.*
- (b) 2. *After inspecting a job site, (Name/Title) will identify and evaluate all potential hazards for potential of serious injuries and probability of an accident. Actions will be taken to minimize the hazards and protect the workers.*
- (c) 3. *The Safety Coordinator or other designated site person will appraise the skill and knowledge level of exposed workers, and provide any needed training.*
- (d) 4. *Where safety and health training is needed, appropriate training will be provided.*
  - (i) Hazards will be identified.
  - (ii) Necessary precautions will be explained.
  - (iii) Training length and level of detail will be determined by the severity of the hazards and the requirements of MIOSHA.
- (e) 5. *Records will be maintained for all training sessions with descriptions of topics covered and names of workers trained.*
- (f) 6. *Toolbox Talks: Toolbox talks will be conducted regularly (weekly/daily). Topics covered will include:*
  - (g) *The safe work practices necessary for that day's work.*
  - (h) *Any safety concerns workers may have.*
  - (i) *Brief refresher training on relevant safety topics (topics to be provided by the Safety Coordinator).*

## **Article XLV. SAFETY AND HEALTH WORK OBSERVATIONS**

**Section 45.01** Safety and health work observations will be performed periodically by supervisors or designated observers.

**Section 45.02** Safety and health work observations ensure: 1) an employee has the knowledge to perform the work as trained, and 2) is actually performing their work task safely. Specific observations or audits are especially critical for lockout/tag out, confined space, or where the risk of exposure is high. Results will be documented and follow-up training will be provided as needed. This process helps assure safety and health training is effective.

## **Article XLVI. TOOLBOX TALKS**

**Section 46.01** Foremen or supervisors shall conduct bi-weekly conferences with all employees on their job sites regarding safety issues specific to the job. There will be written documentation of these "talks".

## **Article XLVII. Hazard Communication Program**

### **Section 30.01 Purpose of Program**

- (a) *This program has been established to meet the requirements of the Hazard Communication Standard of MIOSHA. The purpose of this program and its set of standards is to ensure that employees are made aware of the hazards of chemicals found in their work environment. This information is to be transmitted by means of a written hazard communication program. [Container labeling and other forms of warning, Material Safety Data Sheet and employee education and training programs.] A copy of this written program will be available in the construction trailer and Company vehicles for review by any interested employee.*
- (b) *A survey has been conducted to identify all known hazardous chemicals used by employees here at Pyramid Acoustics. A list of these chemicals and the department in which they are used, as well as copies of the Material Safety Data Sheets for each, appear later in this report. The list of hazardous chemicals and Material Safety Data Sheets will also be available for employee's to review in job trailers.*

### **Section 30.02 Material Safety Data Sheets (MSDS)**

- (c) *The Safety Director will be responsible for obtaining and maintaining the data sheet system for the Company. This individual will review incoming data sheets for new and significant health/safety information. He/she will see that any new information is passed on to the affected employees.*
- (d) *MSDS books will be available to all employees in their work area for review during each work shift. If the MSDS is not available or new chemicals in use do not have an MSDS, immediately contact the Safety Director.*
- (e) *Container Labeling*

### **Section 47.02 The Safety Director will verify that all containers received for use are:**

- (a) *Clearly labeled as to their contents*
- (b) *Note the appropriate hazard warning*
- (c) *Listing the name and address of the manufacturer*

### **Section 47.03 The Safety Director will review the Company labeling system and update as needed.**

- (a) *Employee training and education*

- (i) The Safety Director is responsible for the employee training program. He/she will ensure that all elements specified below are carried out.
- (ii) Prior to starting work, each new employee of Pyramid Acoustics, Inc. will attend a health and safety orientation and will receive information and training on the following:
  - (iii) An overview of the requirements contained in the Hazard Communication Standard
  - (iv) Chemicals present in their work place operations
  - (v) Location and availability of our written hazard program
  - (vi) Physical and health effects of the hazardous chemicals
  - (vii) Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area
  - (viii) How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices, personal protective equipment and good personal hygiene practices
  - (ix) Steps the Company has taken to lessen or prevent exposure to these chemicals
  - (x) Emergency procedures to follow if they are exposed to these chemicals or if there is a chemical spill
  - (xi) How to read labels and review MSDS to obtain appropriate hazard information; and Location of MSDS file
  - (xii) After attending the training class, each employee will sign a form to verify that he/she attended the training, received our written materials, and understood this Company's policies on Hazard Communication.
  - (xiii) Prior to a new chemical hazard being introduced on the job site, each employee of that department will be given information as outlined above. The Safety Director is responsible for ensuring that MSDS on the new chemical(s) are available.

*(b) Informing Contractors*

- (i) It is the responsibility of the Safety Director to provide contractors and subcontractors the following information:
  - a) Hazardous chemicals to which they may be exposed while on the job site,
  - b) Precautions the employees should take to lessen the possibility of exposure by using appropriate protective measures
- (ii) The Safety Director will be responsible for contacting each contractor or subcontractor, prior to beginning work, to gather and disseminate any information concerning chemical hazards that the contractor or subcontractor will be bringing to any Pyramid Acoustics workplace.

## **Article XLVIII. CLOSING**

**Section 48.01** It is our desire here at Pyramid Acoustics that each employee has a safe and enjoyable working experience daily. Working safe is a team effort, and comes from the desire to look out for fellow man. It is our intent with this manual not to just make rules and policies, but to make it a way of life for all who work here. We have provided these policies to let our employee's know as well as those we work with on the job site, that we are serious and driven about protecting our employee's as well as those around us.

**Section 48.02** Our commitment to safety is strong and resolute. We will continue to move forward and strive to set the standard of safe work practices. It is the employees' responsibility to read, understand, and execute these regulations. Each employee must sign an acknowledgement which states that he/she has agreed to these policies and regulations. He/she must also understand the potential for risk and acceptance of those risks when performing certain tasks.

**Section 48.03** The Company guidelines are not all inclusive concerning the measures which should be taken, but meant to be a summary of what Pyramid Acoustics believes to be the most pertinent issues, to provide a source of information, and to outline the minimum guidelines. By your acknowledgement of these guidelines and standards, you agree to abide by the company's rules and regulations.

## **Article XLIX. FINES AND PENALTIES:**

**Section 49.01** **Section 31.01** If a fine has been levied by MIOSHA for the items discussed above, the fine may be assessed partially or in whole to the responsible person or people, and method of payment will be addressed at that time. The owner/management has the right to at their discretion to decide if this will occur and how much of the fine will be assessed.

**Section 49.02** **Section 31.02** Pyramid Acoustics will add charges and addendums as necessary to this manual and review with each employee prior to implementation with a signed safety policy acknowledgement sheet for the changes.

# Pyramid Acoustics, Inc.

## Safety Policy Acknowledgement

**Section 32.01** As an employee of Pyramid Acoustics, Inc., I have read the policy (, understand it and agree to abide by its rules and standards. I will be a part of the effort to make our job safer for everyone involved.

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Employee Name

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Employee Signature

---

Date

Witness

Date

Please read the policy, sign the acknowledgement, and return this form to the office. Keep your copy of the policy in your vehicles; this will ensure that there is a copy on each job site.

## Forms

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### **JOB SITE INSPECTIONS**

(Pyramid Acoustics, Inc.) will conduct daily job site inspections. Hazards will be documented, reviewed, and corrections will be made in a timely manner. More detailed, written inspections will be conducted by (Name/Title) on a (Weekly/Monthly) basis. The Safety Coordinator or other designated safety person will tour each job site and observe potential safety/health hazards, and develop a plan for safeguarding this company's workers which may include the following:

1. Removing the hazard.
2. Guarding against the hazard as required by MIOSHA.
3. Providing personal protective equipment and enforcing its use.
4. Training workers in safe work practices.
5. Coordinating protection of workers through other contractors.

A record of all safety inspections and correctional steps will be kept.

Note to employer: Some sample checklists for inspections can be found at this link:

[Hazard Prevention and Control](#)

*Or go to: [www.michigan.gov/miosha](http://www.michigan.gov/miosha), select "A-Z Topic Index," "Toolbox," and "Module 3 - Hazard Prevention and Control."*

During your inspections, some of the important things to look for are the [Top 25 Serious Violations for Construction](#) that MIOSHA safety officers find.

*Or go to: [www.michigan.gov/mioshapublications](http://www.michigan.gov/mioshapublications), select "Sample Plans and Special Programs" and "SP #11."*

## Exhibits

Safety Plan Check list

Chemical Inventory List

Foreman daily safety inspection list.

New Employee Training Outline

Employee Hazard communication Training worksheet

Msintsinig worksheet for maintaining msds and sds sheets

UR Code Business card for location of this document and msds sheets

Commercial use materials list

End of the day Housekeeping list

Welding Checklist

Designated area for fire, tornado,

Earthquake, flood

Confined space signs

List of possible things to be trained on.

Things outside of this Manual that affect other things that will need to be changed

Foreman Job description

Safety Director Job description