



Health and Safety Manual

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Everything Ice, Inc.

Safety Policy Statement

In all operations, Everything Ice shall be guided by an established accident/incident prevention policy. This policy is based on the sincerest desire to eliminate personal injuries, occupational illness and damage to equipment and property.

All members of Everything Ice management and supervision are charged with the responsibility of preventing incidents and conditions that could lead to occupational injuries or illness. While the ultimate success of our safety and health program depends upon the full cooperation of each individual employee, it is management's responsibility to ensure that safety and health policies and procedures are adequate and enforced, and to see that effective training and education programs are employed to the best advantage.

Safety shall never be sacrificed for production. It will be considered an integral part of our daily operations. Every supervisor will be held accountable for the safety and performance demonstrated by employees under their supervision.

Everything Ice and its subsidiaries are the leaders in their respective markets. Our statistics and programs reflect the quality of management, supervision and the workforce.

Our policy is to provide our employees with a safe, drug and alcohol free workplace. We will accomplish our work in the safest possible manner and consistent with good work practices. Management at every level is charged with the task of translating this policy into positive actions.

Everything Ice, Inc. Health and Safety Manual

Index

- Section 1 Personal Protective Equipment**
- Section 2 Fall Protection**
- Section 3 Hazard Communication**
- Section 4 Lockout/Tagout**
- Section 5 Confined Space Entry**
- Section 6 Excavations**
- Section 7 Reporting Injuries/Incident**
- Section 8 Safety Techniques**
- Section 9 Discipline**
- Section 10 Fire Prevention**
- Section 11 Training**
- Section 12 Operations Involving Lead Paint**
- Section 13 Spill Prevention Response**
- Section 14 Respiratory Protection**
- Section 15 Motorized Vehicles/Equipment**
- Section 16 Equipment/Tool Guarding**
- Section 17 Material Handling**
- Section 18 Drug/Alcohol Policy**

FORMS

- Section 19 Supervisor's Accident/Incident Survey**
- Section 20 Job Hazard Analysis**
- Section 21 Job Site Assured Grounding Program**
- Section 22 Confined Space Permit**
- Section 23 Safety Meeting Attendance Roster**

2. Head Protection

- a. All employees are required to wear hard-hats on industrial project work sites.
- b. Hard-hats must conform to Z89.1-1969, approved hard-hats will bear this stamp or updated version.
- c. Hard-hats may be removed in office areas, the Everything Ice shop, inside enclosed vehicle cabs and on approved job sites.
- d. Employees exposed to high voltage areas shall wear head protection that conforms to ANSI Z89.2-1971.
- e. Everything Ice supervision may disallow any employee's hard-hat that does not conform to the established standards or that has painting, decals or markings that are distasteful.
- f. No damaged hard-hat shall ever be worn on a job site.
- g. Hard-hats must be worn as intended by the manufacturer, any deviation must be pre-approved. Hard-hats bills will be worn to the front.

3. Eye and Face Protection

- a. All employees are required to wear protective eyewear with fixed side shields at all times except in office areas or other safe areas.
- b. Eye protection must conform to ANSI Z87.1-1968. Safety glasses must bear the Z87 stamp.
- c. The wearing of dark colored safety glasses is prohibited in buildings unless the job has specific requirements or the dark glass provides additional needed protection.
- d. Face shields will be worn during certain operations such as grinding, buffing, sanding, chipping and other operations as required.
- e. All eye and face protection must be kept clean and in good repair. Damaged or severely scratched items must not be worn.
- f. While welding and cutting, employees must utilize shading filters of proper tint.

4. Hearing Protection/Noise Control

- a. The criteria and requirements for protection of occupational noise exposure are contained in 29 CFR 1926.52 and 29 CFR 1910.95. The requirements contained in this procedure are minimum requirements and are to be adhered to at all Everything Ice job sites.

Section 1.3

Hazard Communication

1. Overview

This written program is intended to ensure Everything Ice's compliance with the Hazard Communication Standard, 29 CFR 1910.1200 and additional requirements contained in 29 CFR 1926.59.

The purpose of this policy is to establish a written program that applies to all Everything Ice employees.

2. Chemical Hazard Determination

- a. Everything Ice manufactures no chemicals within its facilities. Manufacturers, suppliers and plant facilities will be relied upon to furnish application Material Safety Data Sheets. Everything Ice will compile and retain all MSDS's that apply to normal daily work activities, and they will be made available to employees, customers or other entities as required.
- b. MSDS information will be updated regularly as a new chemical is added to the workplace. When working on a customer site, the job site supervisor and each employee is responsible for the acquisition of MSDS information on chemicals they may encounter. Employees will ensure that the MSDS is current and has been updated appropriately. No job site work must ever begin until each employee knows the location of MSDS information.

2. Material Safety Data Sheets (MSDS) and Chemical List

The Company will ensure that MSDS information is compiled and updated as necessary. Additionally these requirements will apply;

- a. When a new chemical is purchased, an MSDS will be obtained and filed.
- b. All MSDS will be retained in a binder type enclosure and clearly marked for identification. They will be placed in an easily accessible area and made available to all employees.
- c. When bringing a chemical into a customer site, great care will be taken to ensure that the customer has been given a copy of the applicable MSDS.
- d. A chemical list will be maintained of all chemicals in the inventory and should be utilized as an index of the MSDS binders.

3. Markings, Labels and Product Identification

The following rules will apply to chemical containers stored or utilized on the work site(s).

- a. The contents of all storage and portable containers at Everything Ice will be readily identifiable.

- b. At no time, may a different chemical be placed in a receptacle marked for another material.
 - c. The supplier will mark purchased chemicals accordingly. Labels must never be removed or altered unless the chemical has been removed and the container properly decontaminated.
 - d. A container that is to be utilized to temporarily store a material must be appropriately marked and the product identified.
 - e. Any label produced by Everything Ice must conform to ANSI Z129.1-1982 and applicable DOT regulation(s).
4. Employee Training and Awareness

All operational employees will complete the Everything Ice Hazard Communication, Right to Know Training. The training will be documented and a record will be retained of the employees' attendance and examination.

Additionally, the following requirements are imposed:

- a. A program of update training will be implemented and maintained.
- b. Job site specific training will be completed as required.
- c. New chemical or hazard information will be relayed as it is made available.
- d. Any training presented will include hazard identification, chemical classes, MSDS and the uses, location and how to attain them, personal protective equipment and other relative data.

Everything Ice works in many facilities, creating a problem in specific training in job site chemical hazards. It is the intent of this program to equip personnel with a basic understanding of the Haz-Com Standard and prepare them for working in varied environments. The job site supervisor, plant personnel or other contractor as applicable can conduct specific job site training.

Section 1.4

Lockout/Tagout

1. Overview

It shall be the policy of Everything Ice to operate in a work environment free from the hazard of release of stored or potential energy. The purpose of this policy is to prevent injuries to employees from the unexpected energization, start-up or release of energy from machines, equipment or processes when an employee is servicing systems, machines or equipment.

It is realized that specific operations will have specific requirements, therefore this policy is intended as a guideline for the development of “site specific” lockout/tagout procedures. When a “site specific” procedure is developed, the procedure must be reviewed and approved by the customer.

Responsibility

The company President has overall responsibility for the implementation of this program by allocating resources, assigning authority and ensuring accountability.

The company is responsible for training and retraining in the event the situation warrants. Additionally the company will specify the equipment used for energy control and will develop and revise procedures as necessary.

Each supervisor is responsible for the proper application of all energy control procedures and by the employees under his/her supervision, and to recommend changes if needed.

2. Important Terms

- a. affected employee; a person, other than the authorized employee, whose job includes activities covered by this standard.
- b. authorized employee; a qualified person to whom the authority and responsibility to perform a specific lockout and/or tagout assignment has been given by the employer.
- c. energy isolating device; a device utilized to physically restrain the transmission or release of energy, the term does not extend to the use of push buttons, switches or other control circuit devices.
- d. energy source; any electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other energy source that is capable of causing injuries.
- e. hot tap; a procedure used to repair, for maintenance or service activities which involves welding on a pipe or vessel that is under pressure.
- f. lockout device; a device that utilizes a lock and single key to hold an energy isolating device in a safe position.

Attempts must never be made to operate any switch, valve or other energy-isolating device bearing a lock and/or tag. Never remove anyone else's lock or tag. The supervisor should render guidance on the location for employees to lockout processes.

- g. When equipment is locked out/tagged/and tried, work operations may now begin. Employees must be ever wary during their work shift for evidence that an energy source has been re-energized or conditions have changed in some way. If this occurs work must be stopped immediately and the situation corrected.
- h. When the job is complete, a survey is to be made of the process area to ensure that no one is exposed. When the area(s) are clear, the lock(s) and tag(s) may be removed and energy isolating devices operated to restore the energy.

Additional care must be taken to ensure that all tools and equipment have been removed from the process. All guards must be replaced and all controls must be in the "off" position before any locks are removed.

4. Hot Taps

- a. Qualified personnel may only complete hot taps. No hot tapping operation may ever be completed unless the proper safety precautions have been completed.
- b. A job site hazard assessment and procedure should be completed for every hot tap operation. The assessment must take into consideration the type of product in the line/vessel and the materials hazardous properties.

5. Outside Contractors

- a. When outside servicing personnel or other contractors are to be engaged in activities covered in this policy/program, Everything Ice personnel must coordinate with and each inform the other of their lockout/tagout procedures.

6. Shift/Personnel Changes

- a. Continuity of lockout/tagout protection must be maintained during shift and personnel changes. There must be an orderly transfer of lockout/tagout device protection between off-going and oncoming employees.

7. Group Lockouts

- a. When work is to be performed by a crew or group, they will utilize a procedure, which affords the employees a level of protection equivalent to that provided by the implementation of a personal lockout/tagout device(s).
- b. Primary responsibility is vested in an authorized employee for a set number of employees working under the protection of a group lockout, such as a facility operations lock(s). The proper procedure would be for the keys to the group locks are placed in an adequate lock box, and then each employee would individually place his/her lock onto the box/device ensuring protection for the individual.

Section 1.5

Confined Space Entry

1. Overview

The intent of this program/policy is to establish criteria for evaluating confined spaces for acceptable entry conditions, appropriate emergency procedures, required personal protective equipment and employee training requirements.

2. Definitions

The following definitions are provided for the purpose of clarification and to inform the employee of definitive descriptions of important terms commonly utilized during pre-entry and entry operations.

- a. a confined space; is any space that is large enough for an employee to enter and work, has limited entrance and exit and is not designed for continuous human occupancy.
- b. a permit required confined space; is defined as any space that contains one or more of the following hazards:
 1. contains or may contain a hazardous atmosphere
 2. can engulf an entrant with loose material
 3. has an internal design that can trap an entrant, like inwardly sloping floors
 4. contains any other safety or health hazard
- c. the entry supervisor; knows the potential hazards of the space, potential health effects, verifies the pre-entry conditions including air monitoring, ensures the proper PPE is utilized and issues and cancels the permit that also includes emergency procedures, communication types and employee training verification
- d. the authorized entrant; knows the hazards of the space, is authorized to enter the space to perform work, knows the uses and limitations of his PPE, communicates with the attendant, evacuates the space when a potentially hazardous condition exists.
- e. the attendant; knows the hazards of the space, potential health effects of materials that may be encountered, communicates with the entrants, maintains a roster of entrants, and gives evacuation directions whenever a condition exists that may endanger any entrant, additionally the attendant would summon rescue services and keep unauthorized persons from entering the space.

3. Atmospheric Testing and Entry Permits

No Everything Ice employee may enter a confined space unless the proper air monitoring, protection procedures, planning and permitting are completed. This includes pre-enter check list, control of energy sources, wearing of proper PPE and retrieval apparatus and other measures as required. Additionally, the following procedures/rules will apply:

4. Employee Training

All Everything Ice employees who are to be assigned or potentially assigned to confined space entries will be subjected to a training program and examination. The training will include, at a minimum:

- a. The definition of a confined space and permit required space.
- b. The duties of the authorized entrant, attendant and the entry supervisor.
- c. A review of the Everything Ice safety policy.
- d. The use and/or requirement of air monitoring equipment.

Section 1.7

Reporting Injuries

1. Overview/General Application

Every injury must be reported to the employee's supervisor. No matter how small the injury, it must be documented in case medical attention may be required at a later date.

2. Reports

Supervisors are required to complete an incident investigation. The report must be completed the day the injury occurs.

Reports must contain information that may prevent a similar injury in the future.

3. Major Injuries

Supervisors are required to seek medical attention for the employees at once. Notifications will then be made to the customer and Everything Ice management.

4. Minor Injuries

The supervisor is responsible for contacting the customer and Everything Ice management of the injury. The supervisor will confirm the location of treatment for the employee. Medical facilities will be identified in advance for this type of treatment.

Section 1.9

Progressive Discipline Policy

1. Overview

Everything Ice has a basic set of work rules with which all employees are expected to abide. Supervisors and Managers are expected to monitor and enforce these work rules equally. Employees are subject to disciplinary action for any of the offenses listed. This list is not all inclusive and does not limit the company's discretion to discipline or discharge for any reason the company deems sufficient. The disciplinary actions listed may be affected by the circumstances surrounding the offense. In the event of an employee's suspension for disciplinary reasons, benefits will not accrue nor be recoverable during the suspension period.

2. Severe Misconduct

Includes offenses such as; falsification of company documents, gambling or fighting on job sites, concealing defective work, unethical conduct or serious conflicts of interest, gross insubordination, stealing, possession of weapons on company or customer property, violating equal opportunity or harassment policies, sleeping on duty, misuse of company property, violating the company's drug and alcohol policy, willful violation of company safety policies, plant safety rules or applicable laws and regulations, or any other offense considered severe in nature.

1st Offense: 3 days off without pay to termination

2nd Offense: termination

“A positive drug screen will result in termination of employment”

3. Very Serious Conduct

Includes offenses such as; insubordination, failure to follow reasonable orders or violating safety rules, violating company policies, misuse of company equipment or vehicles, speeding or reckless driving in a company vehicle, or any other offense considered very serious in nature.

1st Offense: written warning to termination

2nd Offense: 3 days off without pay to termination

3rd Offense: immediate termination

4. Serious Misconduct

Includes offenses such as; profane, threatening or abusive language, lack of courtesy towards other employees, customers or vendors, failure to report a work related injury, tardiness or unexplained absence from work, or any other offense considered serious in nature.

1st Offense: verbal or written warning to 1 day off without pay

2nd Offense: written warning to 2 days off without pay

3rd Offense: 3 days off without pay to termination

Section 1.10

Fire Prevention

1. Overview

The purpose of this policy is to establish basic guidelines to assist in the prevention of job site fires and immediate response procedures. Everything Ice employees must never endanger their lives or the lives of others in attempting to extinguish a fire.

2. General Requirements

- a. Employees may only smoke in designated areas. If an employee is uncertain about smoking policies for a particular facility he/she must ask the supervisor or designated plant representative.
- b. Strike anywhere matches are prohibited in most plant sites. They are discouraged on Everything Ice job sites and shop areas.
- c. Employees must ensure that they have the appropriate hot work permits before working in most facilities.
- d. Designated special fire watches should not engage in work activities not related to their safety role.
- e. Employees must become acquainted with plant/facility fire and warning alarms. Everything Ice employees must adhere to all plant/facility emergency response procedures.
- f. Employees must ensure that they know the location of fire extinguishers on the job site and be advised of their proper use. The job site must be inspected for combustible and flammable materials that may catch fire and remove them from the possibility of exposure to sparks/flame.
- g. Employees must be aware of all escape exits in their work area, alternate stairways and doors etc.
- h. Fire extinguishers must be inspected daily by employees on job sites. Any extinguisher found to be damaged or discharged must be turned in immediately for repair and replacement.

Section 1.11

Employee Training

1. Overview

The focus of the training program will always ensure “real world” applications of applicable federal, state and local regulations. The training will contain the required information and the application to the job sites.

2. New Employee Training

As a minimum, new employees will receive training on the following topics and their applications to Everything Ice job sites:

- a. Hazard Communication Standard
- b. Confined Space Entry
- c. Personal Protective Equipment
- d. Lockout/Tagout/Tryout
- e. Respiratory Protection
- f. Fall Protection
- g. General Job Site Safety
- h. Scaffold User
- i. Process Safety Management

Section 1.12

Operations Involving Lead Paint

1. Overview

It is recognized that operations involving the removal of lead paint present an obvious health risk to Everything Ice employees. This policy is intended as a basic guideline only. Operations involving lead must be researched thoroughly and well coordinated with the plant/facility safety personnel. All operations must meet the requirements set forth in 29 CFR 1926 and other applicable regulations.

2. Minimum Requirements

For operations involving a potential exposure to lead, the following guidelines must be met in addition to other requirements, regulations and directives:

- a. A competent person will be designated for each job site. This person must be qualified to fulfill the duties for which they will be tasked.
- b. All personnel will be trained on the appropriate rules and regulations, and the potential health effects of lead exposure and decontamination procedures.
- c. The proper respiratory protection will be determined and utilized in the work area at all times when work operations are ongoing.
- d. A blood analysis will be conducted of all potentially affected employees before and after the job site operation. A baseline will be established and then the employees will be tested for any potential exposure.
- e. All work areas will be barricaded, identified and controlled. Special attention must be given to areas in which contaminated dust may be blown.
- f. A job site hazard analysis and site safety plan will be completed before any operation may begin. Plant safety personnel must approve any plan.
- g. Good housekeeping practices will be enforced at all times.
- h. All contaminated clothing must be disposed of properly on the job site.
- i. All contaminated equipment must be decontaminated before removal from the job site.
- j. All disposal procedures must be approved by the host facility and must be approved before any job site operation may begin.
- k. Certain job site operations may be performed without total compliance to this policy. Some operations such as ultrasonic testing, pre-project walk throughs and quality inspections may receive a deviation from policy. The company President must approve any deviation.

Proper planning and training is the key to conducting operations in environments that may expose employees to lead. Everything Ice employees will ensure that no job operation proceeds that may involve an exposure to lead unless the company President and plant safety personnel are notified and the proper planning and procedures occur.

Section 1.13

Spill Prevention and Response

1. Overview

The purpose of this policy is to establish basic job site guidelines to prevent spills of hazardous materials. In the unlikely event that a spill does occur, basic guidelines are also specified to assist in response to the incident.

2. Prevention Measures

- a. Employees will ensure that they are fully aware of the physical state and the hazardous properties of the materials on their job sites.
- b. Employees will ensure that they have the proper PPE and respiratory protection on the job site before work begins.
- c. Employees will ensure that any valves or other closing devices work properly before work operations begin.
- d. Hoses and pipes will be inspected for defects before use.
- e. Employees will determine the proper hose, fittings and appliances to be used before job functions begin.
- f. Gaskets, o-rings and seals will be inspected before use in any process.
- g. Valves must always be opened and closed slowly to prevent water hammer and damage to a system.
- h. Tops, caps and lids will be replaced after any use of a liquid from a container of any type.
- i. Manways, hatches and doors will not be opened unless assurances are made that no product may escape when opened.
- j. Whenever a portable pump is utilized, discharge ends should be secured to ensure control of the end of the hose and proper disposal of the pumped material.
- k. Any employee that becomes contaminated must be cleaned immediately. Spread of the contamination throughout the plant must be prevented, especially in restrooms and wash areas.

3. Response Procedures

- a. All spills will be reported to the facility as soon as possible.
- b. The spill will then be reported to Everything Ice management.

Section 1.14

Respiratory Protection

1. Overview

This program/policy is to ensure that Everything Ice employees and any subcontractors are provided the proper respiratory protection for the job site operation to be performed. Oversight responsibility for the program is given to the Everything Ice President. This policy is intended to provide guidance for situations in which employees may need to wear respiratory protection. It is understood that all situations encountered may not be addressed in this program, in which case, plant safety personnel will provide specific guidance.

2. Recognizing and Evaluating Respiratory/Atmospheric Hazards

The selection of proper respiratory protection depends initially on the evaluation of the atmosphere to be worked in, or potentially exposed to. Several factors must always be considered in evaluating an atmosphere to determine the requirement for respiratory protection and proper hazard identification. The following guidelines are to be considered when any evaluation is made concerning the requirement for respiratory selection.

- a. A determination must be made if the atmosphere is oxygen deficient. Any oxygen level below 19.5% is to be considered deficient. This atmosphere would prohibit the use of negative pressure/air purifying respirators.
- b. A determination must then be made concerning the nature of other known or potential hazardous atmospheres. The following criteria is established and required for consideration:
 1. Type of hazard; gases, dust, fumes, mist etc.
 2. Seriousness of the hazard. Is it immediately dangerous to life and health?
 3. Airborne concentrations and how long will employees be potentially working in the atmosphere.
 4. Chemical properties, permissible exposure limits (PEL) and threshold limit values (TLV) must be determined.
 5. The odor threshold, or at what concentration could the material be smelled is a very poor indicator of airborne concentrations and is never to be used in a job site evaluation.
 6. Once determination is made concerning atmospheric concentrations, consideration must be given to the PEL and TLV. The lower of the two will be utilized in making an evaluation of the work site.

3. Selecting a Respirator/Engineering Controls

The level selected of respiratory protection must always be made after considering carefully the known and potential hazards. The following procedure will be followed when selecting a respirator:

Step 1 . . . Engineering Controls

- a. Can the potential exposure be controlled through the use of engineering or administrative controls? If not, a respirator will be required.

6. Physician Certification

- a. Medical certification is required for employees to wear respirators.
- b. The medical facility will base their determination on an examination, health history and pulmonary function test.
- c. A medical facility will be identified and this policy/program furnished to the facility and its medical staff for evaluation.

7. Training

Employees required to wear respiratory protection will receive training on the following material. Training should be renewed at least annually.

- a. Why respiratory protection is required
- b. Identification and evaluation of hazards
- c. Respirator selection/to include common cartridge types and colors
- d. Importance of proper fit/fit testing requirements
- e. Limitations of respirators
- f. Care, inspection and maintenance of respirators
- g. Proper donning and doffing procedures

8. Evaluation of Program

The Everything Ice respiratory protection program will be evaluated at least annually. Changes in policy, new or upgraded procedures and specific guidelines may be established as needed.

Section 1.18

Drug and Alcohol Policy

Program Statements

This program will apply to all regular full-time, part-time, probationary, casual or contract employees, and job applicants. Where the company deems it appropriate to do so, this program will also be applied to subcontractors, visitors, vendors and invitees.

The use of illegal drugs, or the abuse of alcohol, on or off duty, may impair the ability of workers to perform tasks that are critical to proper work performance. The result is an increase in accidents, which pose a serious threat to the safety of all workers and the general public. Impaired workers also tend to be less productive, less reliable and prone to greater absenteeism, resulting in the potential for increased cost and delays in the timely completion of work projects.

Everything Ice believes that the employee has the right to work in a drug-free environment and to work with persons free from the effects of drugs and alcohol. Workers who abuse alcohol or drugs are a danger to themselves and others.

All employees are notified that the following is strictly prohibited from any and all work sites during working hours; the use, or abuse, presence in the body, reporting to work under the influence; bringing onto the work site; the unlawful manufacture, distribution, possession, transfer, storage, concealment, transportation, promotion or sale of illegal and unauthorized drugs, controlled substances, alcoholic beverages or drug-related paraphernalia by employees. Violations of this program will subject the employee to disciplinary action, up to and including termination. Everything Ice will require compliance with this program as a condition of employment for qualified applicants or continued employment for other employees.

The Federal Drug Free Workplace act will be applied to meet the specific requirements of a particular site or jurisdiction or to comply with the contractual obligations of customer or government agencies in order to perform work on their project or property.

1. Goals of the Program

The objective of this policy/program is to provide objective, fair and manageable procedures for drug screening of employees for the presence of ingested drugs. The purpose of this program is to assist in the identification of those individuals who may have substance abuse problems, and to increase on-the-job safety and productivity by denying job site presence to individuals whose abilities are believed impaired by drugs or alcohol. This program along with an Employee Assistance Referral Program, will help produce a drug-free workplace and improve workplace safety.

2. Types of Testing Conducted

The type of testing conducted under this program shall include pre-employment, random, post incident, for cause, customer required and annual testing. The random screening will be conducted monthly, a minimum 2% of all employees will be tested. The random screening will be administered without regard to title or position. The testing will be conducted in addition to other screening required by DOT regulations. Percentages of personnel screened may increase without notice. A National Institute for Drug Abuse certified laboratory shall analyze all urine samples collected under this program. The laboratory utilized by Everything Ice is in compliance with these guidelines.

3. Post Incident/Accident Testing

Any Everything Ice employee involved in an accident, incident or near miss will be administered a post incident drug, and/or alcohol screen as appropriate. Incidents covered by this policy include situations that involve personal injury, property damages, dangerous acts or incidents that had the potential to cause personal injury or property damages. If the employee is injured, efforts should be made for the screen to be conducted at the medical facility that rendered the initial medical care. In signing the appropriate area designated at the end of the employee handbook, the employee hereby agrees to the release of any/all medical and drug/alcohol screening records that pertain to any injury, alleged injury or condition that occurred while involved in activities for Everything Ice.

4. Testing for Cause

Employees may be tested for cause under the following conditions:

- a. The facts available indicate the suspected employee is using prohibited drugs or has consumed alcoholic beverages.
- b. The facts must be based on evidence of observed use, job performance, unusual behavior or other activities/conditions to support the screening.
- c. The evidence must be documented, and had been observed by a Foreman, Supervisor or any other member of management. Annual training shall be provided for supervisors and managers to ensure their competence in this area.
- d. It shall be determined prior to the screen that the employee received a copy of the drug/alcohol screening policy.

5. Annual and Customer Required Testing

Everything Ice does not require fitness for duty medical examinations for all employees, but all employees will be administered drug screening at least annually. This screening will occur at the time of the employee's hiring anniversary.

Certain Everything Ice customers require testing more stringent or frequent than this policy indicates. In these cases, the employee must complete the required testing and will be considered a condition of employment.

6. Positive Results/MRO Review

Drug screening results that return from the laboratory with non-negative results will receive review by the company MRO (medical review officer). The employee will be contacted first by the MRO and the results reviewed. An employee may request, in writing, a second screen of the same specimen. (In some situations, laboratories conduct the second screen without being prompted.) The MRO will review the non-negative results of the screen with the employee and attempt to determine if the non-negative results can be attributed to the legal and proper use of the substance in question. If this is the case, Everything Ice will not be notified of the initial non-negative (positive) result. After the MRO has verified the "positive" result, and consulted with the employee, the company plan administrator may then be notified. If the MRO has attempted to contact the employee for three calendar days without success, the MRO may contact the company plan administrator and relay the results of the screen. Employees and applicants whom receive a verified positive test result from

the MRO may contest or explain the results to the employer within (5) days after written notification of the test results. In signing the appropriate area designated at the end of the employee handbook, the employee agrees to have any/all information related to his/her drug and alcohol screening released to Everything Ice for any testing that occurred at the expense of Everything Ice.

7. Pre-Employment Testing

Pre-employment drug screening will be conducted on all applicants. A non-negative (positive) drug screen, refusing to submit to testing and rendering an altered/diluted screen will end the individuals employment opportunity at Everything Ice. Applicants may re-apply after a period of 90 days. Drug screening at this time will be at the individuals expense, and at a Everything Ice approved location.

8. Refusing Testing and Altering Specimens

Employees who refuse to be screened within the guidelines of this policy or who attempt to/or alter the composition of a rendered specimen will cease work activities immediately and their employment terminated. Any employee terminated for refusing screening/altering specimens may be reconsidered for employment after 90 days. At this time, a screen indicating negative results must be submitted to Everything Ice for review. The screen must be completed at the individuals expense, occur within 48 hours of in-processing and have been completed at a location approved by Everything Ice.

9. Positive Test Results

Employment will terminate for any employee that tests “non-negative” (positive) during their employment with Everything Ice. The termination will occur for a violation of company policy. Any employee terminated for a non-negative screen may be reconsidered for employment after a period of 90 days from the screen date. At this time, a drug/alcohol screen indicating negative results must be submitted to Everything Ice for review. The screen must have been completed within 48 hours of re-hire, be at the individuals expense and have occurred at a location approved by Everything Ice. Individuals, at their own expense, may “complete” a program of drug and/or alcohol rehabilitation or counseling and may be reconsidered for employment after a period of 60 days. At which time the individual would have to present a negative drug and/or alcohol screen to Everything Ice for review. This screen will be at the individuals expense, occur within 48 hours of re-hire and have been completed at a location approved by Everything Ice. Any individual re-hired after a non-negative screen result will be considered “on probation” and must submit to 1 screening within the first 6 months of re-employment. This screen will be conducted at the discretion of the company at an unannounced reasonable time with no previous warning to the employee and will be the financial responsibility of the individual.

10. Alcoholic Beverages

It shall be the policy of Everything Ice that no operational employee may consume alcoholic beverages while in an on-duty status.

Employees will ensure that they do not report for work status after they have consumed alcoholic beverages. The employee must act responsibly and recognize that intoxication at any level can be detrimental to the safe operations on a job site. Employees believed to have

been involved in consuming alcoholic beverages will not be allowed to perform work activities of any nature. Any employee that is tested under this policy and whose blood alcohol level tests above the level of 1.0 will be considered intoxicated and their employment terminated.

11. Possession of Illegal Drugs and Alcohol

Employees will not possess any alcoholic beverage, illegal drug or substance at any time on Everything Ice job site or operation. This policy will extend to the use of company vehicles. At no time may these items be stored, transported or allowed in any company vehicle or Everything Ice toolbox. Everything Ice property is subject to inspection at any time by supervisors and members of management.

12. List of Prohibited Substances and Testing Limits

For the purposes of this policy, the following drugs and substances are to be considered prohibited:

Drug	Screening Limit	Confirmation Limit
1. marijuana/cannabinoids	100ng/ML	15 ng/ML
2. cocaine/all forms and usage	300ng/ML	150ng/ML
3. opiates/opium	300ng/ML	300ng/ML
4. PCP/phencyclidine	25ng/ML	25ng/ML
5. Amphetamines	1000ng/ML	500ng/ML
6. barbiturates	200ng/ML	200ng/ML
7. propoxyphene	300ng/ML	300ng/ML
8. methadone	300ng/ML	300ng/ML
9. benzodiazepines	200ng/ML	200ng/ML
10. improper use of prescription drugs/determined by MRO		
11. improper use of alcohol in violation of this policy		

13. Employee Assistance Referral and Training

1. Everything Ice realizes that chemical dependence and other medical behavior conditions are highly complex problems, which can be successfully treated. Each employee is responsible for seeking help before an alcohol or drug problem leads to disciplinary action. The employee’s decision to seek assistance (self-referral) prior to violation of the program will not be used as a basis for disciplinary action and will not be used against the employee in any disciplinary proceeding. Employees are encouraged to contact their individual health program for assistance. Everything Ice will maintain a resource file of assistance programs but will accept no financial responsibility for any treatment the employee seeks. Employees will be provided with information or training twice annually on the contents of this program and referral services available.

14. Job Announcements and Postings

1. All job announcements will include notice of substance abuse testing for all positions.
2. Notice of substance abuse testing will be displayed in a conspicuous and appropriate manner on Everything Ice premises.

3. All employees and applicants may request a copy of this policy at any time and will be available from the President.

15. Confidentiality

1. The employee's expectation of privacy and confidentiality is a top priority of this program. Accordingly, all testing results will be considered a confidential record and will not be disclosed except as authorized by the employee, as legally required or on a need to know basis.

SECTION 1.15

MOTOR VEHICLES/EQUIPMENT

Introduction

The act of driving or riding in a motor vehicle, in and of itself, places individuals at increased risk of suffering serious injury or death. In an effort to reduce the potential for vehicle accidents, all Everything Ice motor vehicles shall be kept in good operating condition and shall be equipped with appropriate safety equipment. Drivers and passengers must obey all traffic laws when operating or riding in Everything Ice owned vehicles and, in addition, are expected to follow the requirements outlined in this section.

- Good driving is based on practice and being alert at the wheel.
- Good drivers know that driving is a full time job. They give driving their full attention.
- Good drivers drive defensively, scanning the road ahead as well as objects to the side and rear.
- Good drivers know, understand and respect the rules.
- Good drivers keep their vehicle in safe operating condition.
- Good drivers do not drive when they are ill, upset or angry.

Driver Requirements

Persons other than Everything Ice employees are not permitted to operate Everything Ice owned vehicles unless authorized by the Company President or his designee, and then only for official Everything Ice business.

All drivers of Everything Ice vehicles must have a valid driver's license.

Individuals responsible for Everything Ice vehicles must visually inspect the driver's license of a prospective driver to ensure it is valid, before allowing him/her to operate the vehicle. These visual inspections should be done on all drivers at least once annually to ensure that the license continues to be valid. This review should give special attention to any restrictions, such as corrective lenses, daylight driving only etc. imposed on the driver as a condition of being licensed.

Service vehicles and equipment shall comply with the Department of Transportation rules and regulations and with appropriate State requirements regarding such items as safety equipment, lights, and placards. Vehicles and equipment must be maintained according to manufacturer's recommended guidelines. If operating manuals are not available, contact should be made with a dealer or the manufacturer. Vehicles and equipment on loan to Everything Ice shall also be operated in compliance with Everything Ice safety regulations.

Passengers are allowed only in vehicles designed to carry passengers.

Required Safety Equipment and Insurance Documents

The following safety equipment is required on all Everything Ice automobiles and trucks and must be maintained in good operating condition at all times:

- adequate rearview mirrors,
- safety belts,
- windshield wipers,
- horn,
- correctly adjusted headlights,
- brakes with adequate stopping power,
- emergency brakes,
- directional signals,
- good tires with adequate tread,
- safety glass,
- brake lights,
- tail lights,
- license plate light,
- tight muffler system,

Unsecured seating, such as chairs or benches, is not permitted in Everything Ice vehicles for the purpose of transporting passengers.

Maintenance and upkeep of required safety equipment shall be given a high priority for attention. The appropriate supervisor shall take prompt action to correct deficiencies noted. If such corrections cannot be accomplished in a timely fashion, the vehicle in question is to be taken out of service until repairs can be made.

Special attention should be given to the following items:

- **Brakes:** Check to see that the pedal stays well above the floor when you step on it. If the vehicle pulls to one side when you use the brakes, or you hear any scraping or squealing noises, the brakes may need to be repaired.
- **Lights:** Check for burned-out bulbs and clean the light lenses often. Dirty headlights can cut your night vision by one half. Burned-out signal lights or brake lights mean you can't tell other drivers what you are doing.
- **Windows and Windshields:** Keep the glass clean, inside and out, to reduce glare and improve vision. Windshields should be intact. Cracked windshields should be replaced.

Use of Safety Belts

One of the most important safety devices in any vehicle is the passenger restraint or seat belt. The use of safety belts is required in all vehicles operated on the roads and highways in accordance with state law. All operators and their passengers will utilize their seat belts in the prescribed manner when operating and/or riding in a Everything Ice vehicle. Failure to wear a seat belt may result in disciplinary action and reduced workers' compensation benefits in the event of an accident resulting in injury or death.

In the unlikely event a Everything Ice vehicle is not equipped with safety belts, it should be immediately retrofitted with this equipment in order to ensure compliance with the statutes.

Backing of Vehicles

Backing of vehicles should be avoided, whenever possible. Routes of travel should be planned to avoid backing. If backing a vehicle is necessary, the following steps should be followed to avoid accident:

- If two people are in the car, one should be stationed outside to direct the backing action. The driver should keep the helper in view to ensure that he is not struck by the automobile. Backing is the driver's responsibility, even with a helper.
- If there is no helper, the driver must get out and walk around the vehicle prior to backing.
 - Look up to ensure that overhead wires or structures can be safely cleared.
 - Look down to identify any unusual depressions, holes or debris that may interfere with safe backing.
 - Observe pedestrian traffic patterns.
 - Observe fixed objects or parked, unoccupied vehicles.
 - Back slowly using rear view mirrors frequently. Less damage will occur if the backing action is very slow.
 - If backing vision is obscured, stop the vehicle every few feet to exit and recheck the backing route.
 - Remain constantly alert at all times while backing a vehicle for the potential for an automobile or pedestrian to appear unexpectedly in the path of travel.

In Case of an Accident

If you are involved in an accident while driving, you must stop. If anyone is hurt, you must get help.

Contact the appropriate law enforcement agency and request immediate assistance.

Obtain completed copies of the Driver Exchange Information Form from all drivers involved in the accident. This form contains valuable information, which will help facilitate resolving insurance claims.

Notify the appropriate supervisor of the details of the accident as soon as possible. The supervisor should, in turn, notify Environmental Health and Safety so that important insurance functions can be initiated.

Safety Guidelines for Hauling Loads

Loads subject to tipping or shifting shall be securely fastened to the vehicle.

Vehicles shall not be loaded beyond their capacity, whether it be for transporting personnel, goods, or equipment.

All tools, equipment and cargo, when transported along with personnel, shall be loaded, placed or secured in such a manner that they will pose no hazard, in any way, to personnel.

Whenever a load extends four feet or more beyond the rear bed or body of a vehicle there shall be displayed:

- At night, or when visibility is reduced to less than 1,000 feet, sufficient red reflectors to make the load clearly visible to traffic approaching from any direction.
- During the daytime, red flags, not less than twelve (12) inches square, must be placed on the overhanging load to mark its length and width at each place where a red lamp is required on this load at night.

A close-fitting tarpaulin or other cover is required to be used when hauling dirt, sand, lime rock, gravel, or other similar material, including trash or garbage.

Motor Equipment

Motor equipment is required to be equipped with a reverse signal device if there is an obstructed view of the rear and there is not a designated observer available to signal the operator when it is safe to move the equipment to the rear. The reverse signal device must be audible and sufficiently distinct to be heard over prevailing conditions. The device must be operational automatically upon commencement of backward motion, be continuous or intermittent (not to exceed 3-second intervals), and be operational during the entire backward movement.

Belts, gears, shafts, pulleys, sprockets, spindles, drums, flywheels, chains, or other reciprocating, rotating, or moving parts of equipment are to be guarded if such parts are exposed to contact by any person or otherwise create a hazard. All hot surfaces of equipment, including exhaust pipes or other lines, are to be guarded or insulated to prevent injury and fire. Exhausts or discharges from equipment should be directed so that it does not endanger any person or obstruct the operator's view. Platforms, footwalks, steps, handholds, guardrails, and toe boards are to be provided on machinery and equipment to provide safe footing and accessways. Guards and safety appliances or devices shall not be removed from machinery, equipment, or made ineffective except for the purpose of making immediate repairs, lubrications, or adjustments, and then only after the power has been shut off. All guards and devices shall be replaced immediately after completion of repair and adjustments and before power is turned on.

To protect the operator from falling and/or being hit by flying objects, all bulldozers or similar equipment used in clearing operations shall be provided with guards, shields, canopies, and grills appropriate to the nature of the operations. The overhead cover on this canopy structure shall be not less than 1/8 inch steel plate, or 1/4 inch woven wire mesh with openings no greater than 1 inch or equivalent. The opening in the rear of the canopy structure is covered with not less than 1/4 inch woven wire mesh with openings no greater than 1 inch.

Rollover Protective Structures (ROPS) and seat belts are to be installed on crawler and rubber-tired tractors such as dozers, push and pull tractors, winch tractors, mowers, water tank trucks having a tank height less than the cab; off-the-highway self-propelled pneumatic-tired earth movers such as trucks, pans, scrapers, bottom dumps, end dumps, and motor graders; and other self-propelled construction equipment such as front-end loaders, backhoes, and rollers. ROPS shall not be required on crane-mounted dragline type backhoes, rollers, and compactors of the tandem steel-wheeled and self-propelled pneumatic-tired type, self-propelled rubber-tired lawn and garden tractors under 20 drawbar horsepower, or steel rollers used exclusively for asphalt, bituminous surface work, and preparation of paving sub-base materials, cranes, draglines, or equipment on which the operator's cab and boom rotate as a unit. Each ROPS is required to have:

- Manufacturer's or fabricator's name and address.
- ROPS model number, if any.
- Machine make, model, or series number for which the structure was designed.
- Certification which meets the American Welding Society Standards D2.0, Part II, or equivalent.
- Two-piece seat belts and anchorages.

Each heavy equipment operator is provided with a helper on the ground to assist with work when necessary. Helpers must wear high visibility vests. Night operation of heavy equipment is restricted to fires or similar emergencies.

Ample clearance is provided for personnel between any solid material and the tail swing of a dragline, shovel, or crane. Barriers preventing access to the pinch point should be provided.

Service equipment with parts or accessories lowered by gravity or hydraulic levers, such as shovels, buckets, and bulldozer blades, shall have such parts or accessories resting on the ground and the controls in gear when equipment is shut down, unless the manufacturer's instructions state otherwise. The brakes should be secured and the wheels blocked if the equipment is on an incline.

Slow moving vehicle signs shall be mounted on wheeled tractors and all other units that travel public roadways at speeds of 25 mph or less.

Fork trucks must be equipped with a vertical load back rest extension manufactured in accordance with the ANSI Standard for Powered Industrial Trucks, where the type of load presents a hazard.

Powered Industrial Truck Operations.

No person shall be permitted to stand or pass under the elevated portion of any powered industrial truck.

Unauthorized personnel shall not be permitted to ride on a powered industrial truck.

An overhead guard shall be used as a protection against falling objects. This is not required for powered hand trucks.

In those instances where the truck is equipped with vertical only or vertical and horizontal controls elevatable with lifting forks for lifting personnel, a safety platform firmly lifting carriage and/or forks must be used. The employee on the platform must be able to shut off power to the truck. Protection from falling objects necessitated by operating conditions shall be provided.

A safe operating distance shall be maintained from the edge or platform while on an elevated dock or platform.

Vehicle Towing and Trailers.

All towing devices used on any combination of vehicles shall be structurally adequate for the weight drawn and be properly mounted.

A locking device or double safety system shall be provided on every fifth-wheel mechanism and tow bar arrangement which shall prevent the accidental separation of towed vehicles.

Every full trailer shall be coupled to the towing vehicle with safety chains or cables to prevent the separation of the vehicles in the event of a failure of the tow bar.

Trailers should be loaded so that the weight is distributed evenly on all wheels. When properly balanced, approximately 15 percent of the total weight rests on the trailer hitch, the heaviest items should be on the bottom in order to maintain a low center of gravity and aid in stability.

Electric hookups shall activate the tail lights, brake lights, and turn signals. Trailers of 6.6 feet or more in width at any point, including the load, shall have front and rear side marker lights.

Proper emergency gear shall include prescribed flares and reflectors required by law and be available when a trailer is operated on a public road. The emergency gear shall also include adequate strength chain and/or cable to be used for extraction purposes.