

Safety and Health Program

An Injury Prevention Program

Issue Date:

01/01/2010

Review date:

01/01/2011

Reviewer:

Lawrence W. Cosenza

Signature:

Headquarters:

4663 Route 9G

Germantown, NY 12526

(518) 537-7678

Operations

Greenville High School

Route 81

Greenville, NY 12083

TABLE OF CONTENTS

Part I: Safety and Health Plan Basic Principles	4
Management Commitment and Responsibilities	4
Employee Commitment and Responsibilities	4
Analysis of Workplace Hazards	5
Reporting Safety Concerns	6
Safety Call	6
Safety Incident Investigation.....	6
Annual Incident Review.....	6
Maintenance Program	6
Discipline Policy	7
Emergency Action Plans.....	7
Emergency Exit Routes	8
First Aid and Medical Emergencies	8
Medical Surveillance	8
Company Training Requirements	9
Company Safety Orientation	9
Job Specific Safety Training	9
Periodic Training.....	9
Designating Trainers	10
Company Safety Policy Review.....	10
Part II: OSHA Injury and Recordkeeping Program	11
Purpose	11
Program Coordinator	11
Determination of Work-Relatedness.....	11
Exceptions to Work Related Injuries or Illnesses.....	11
Working from Home.....	12
Travelling Employees	12
Types of Injuries and Illnesses	12
Procedure for Submitting Work-Related Injuries and Illnesses	13

Supervisor Actions	13
Recordkeeping Coordinator Actions	14
Privacy Cases	14
Annual Summary	14
Employee Review of Records	15
Record Retention and Updating	15
Reporting Fatalities or Catastrophes	15
Employee Training.....	15
Part III: Company Fire Prevention Program.....	16
Purpose	16
Program Responsibilities	16
Management.....	16
Fire Prevention Coordinator.....	17
Supervisors.....	17
Employees	17
Plan Implementation	17
Housekeeping.....	17
Maintenance of Fire Prevention Equipment	18
Maintenance of Safeguards on Heat Producing Equipment	18
Types of Hazards	19
Electrical Fire Hazards	19
Portable Heaters	19
Office Fire Hazards	20
Cutting, Welding, and Open Flame Work	20
Flammable and Combustible Materials	20
Smoking	22
Additional Fire Hazards	22
Training.....	22
Program Review.....	23

Part IV: Hazard Communication	24
Purpose	24
Container Labeling.....	24
Material Safety Data Sheets	24
Employee Information and Training	24
Hazardous Chemical List	25
Hazardous Non-Routine Tasks	27
Chemicals in Pipes.....	27
Informing Contractors.....	27
Part V: Personal Protective Equipment.....	28
Purpose	28
General.....	28
Responsibility and accountability.	28
PPE Selection Guidelines.....	30
Eye and Face Protection	30
Head Protection.....	30
Foot Protection.....	30
Hand Protection.....	30
Respiratory Protection.....	31
Fall Protection	31
Electrical Protection	31
Monitoring and Review	31

PART I: SAFETY AND HEALTH PLAN BASIC PRINCIPLES

C2 Biotechnologies, LLC and its management are completely committed to the safety and health of all employees. It is our priority that every employee goes home safe, every day.

MANAGEMENT COMMITMENT AND RESPONSIBILITIES

Our strong safety culture is achieved through collaboration and cooperation of employees and management. Management provides the resources for our safety program, and is committed to the following general responsibilities:

1. To provide a work environment that protects employees from occupational injuries and illnesses.
2. To design, implement, and monitor company safety policies and procedures.
3. To lead annual reviews in company safety programs and procedures, and to make corrections and improvements as necessary.
4. To provide methods for employee feedback and input on company safety and health programs.
5. To ensure that periodic work hazard assessments are conducted.
6. To set safety and health improvement goals, and create action plans for achieving those goals.
7. To clearly establish the safety and health responsibilities of all employees, and to include them in written job descriptions.
8. To provide required safety and health training to employees.
9. To include safety and health as part of employee periodic evaluations.
10. To ensure that visitors receive appropriated training on the hazards they will be exposed to.
11. To ensure that contractors employed on the site have a commitment to safety excellence and meet the same requirements of company safety programs.
12. To provide recognition to employees who demonstrate outstanding commitment to safety and health.

EMPLOYEE COMMITMENT AND RESPONSIBILITIES

Employee involvement in all aspects of the safety program is critical to its success. Employees are closest to the work processes, so they must actively communicate with management to facilitate pro-active solutions to safety problems. Our employees are committed to the following responsibilities:

1. To immediately stop work in any instance where they feel safety or health is in jeopardy.
2. To follow all company safety and health policies and procedures.
3. To complete all necessary training before performing work.
4. To inform management of all safety and health concerns.
5. To provide input and feedback to all company safety and health policies.

ANALYSIS OF WORKPLACE HAZARDS

C2B has performed a baseline hazard survey in all of its work areas. This was accomplished using a job hazard analysis process and outside consultants as necessary. All hazards found in these surveys are either eliminated or controlled. When dealing with workplace hazards, the company's hazard management priority is as follows:

1. Engineer out the hazard.
2. Change the work process to eliminate the hazard.
3. If the hazard cannot be eliminated through engineering or work controls, provide employees with proper personal protective equipment.

Work processes and hazards are both constantly changing. To ensure employee protection, new hazard analysis will be performed as work processes, equipment, and environments change. Employees will participate in these hazard assessments, which will be reviewed by management. Work will not be allowed to continue until these hazards are properly dealt with.

Hazard analysis will also occur on an as required basis. Management, with input from selected employees, organizes the site inspection team. Membership on these teams rotates with the goal that all site employees serve at least once each year. Teams consist of four people, two managers or supervisors and two employees. The team inspects the entire worksite, and in writing describing all hazards found, including their location. The team assigns appropriate persons responsible for seeing that the hazard is corrected and documenting the date of the correction. These inspection reports are posted in the lunch room, in the maintenance shop, and in the

owner's office. A hazard remains on the monthly report until it is corrected.

REPORTING SAFETY CONCERNS

Safety hazards must be reported immediately. Employees must report hazards or concerns to their supervisor or safety representative. This report may be written or oral, but is the responsibility of the supervisor or safety representative to ensure the concerns are recorded. The report will be entered into a safety log, where it will be tracked until the safety concern has been corrected. Serious safety concerns that immediately affect employees must be dealt with quickly. Work must be stopped until the problem is rectified.

The company also allows for employees to anonymously report their safety concerns. Any employee can submit an anonymous concern by dropping a note in the safety suggestion box that is located in the employee break room. The company has a strict no-retaliation policy. Suggestions are valuable for the improvement of safety, and employees can make suggestions without fear of reprisal or complaint.

SAFETY CALL

Any employee, no matter how junior, can stop all work by simply calling a "safety." When a safety is called, all work must stop until a supervisor addresses the concern and verifies that the problem has been corrected. Employees will not hesitate to call time outs when they are necessary.

SAFETY INCIDENT INVESTIGATION

Any near miss, first aid incident, or accident is investigated by the trained team designated by management. The team consists of two managers or supervisors and two hourly employees, each of whom has received training in accident investigation. All investigations have as a goal the identification of the root cause of the accident, rather than assigning blame. All accident reports are posted in the lunch room and are open to comment by any employee. The accident investigation team assigns responsibility to appropriate employees for correcting any hazards found and for assigning a date by which the correction must be completed.

ANNUAL INCIDENT REVIEW

As part of the annual safety and health program evaluation, management and selected employees will review all near misses, first aid incidents, and entries on the OSHA 300 Log, as well as employee reports of hazards, to determine if any pattern exists that can be addressed. The results of this analysis are considered in setting the goal, objectives, and action plans for the next year.

MAINTENANCE PROGRAM

Properly functioning equipment is a critical component of the company safety plan. Management uses a scheduled maintenance plan, and ensures that the worksite and all machinery is cared for properly so that the environment remains safe and healthy. If maintenance needs exceed the capability of the worksite employees, contract employees are hired to do the work and are screened and supervised to ensure they work according to the site's safety and health procedures.

DISCIPLINE POLICY

All employees, including all levels of management, are held accountable for obeying company safety and health rules. The following four step disciplinary policy will be applied to everyone by their supervisor.

1. Verbal Warning - The supervisor will provide a verbal warning to the employee for failing to adhere to a safety policy.
2. Written Reprimand - A reprimand will be written by the supervisor, and discussed and signed by the employee. The reprimand will be placed in the employee file.
3. Suspension - The employee will be suspended without pay for an amount of time determined by management.
4. Dismissal - The employee's employment will be terminated.

Employee discipline will typically occur in the order listed above. However, depending on the severity of the infraction, management may decide to skip steps in the process. **Any willful violation of policy that places the safety of any employee at risk may result in immediate dismissal.** Visitors, including contractors who violate safety and health rules and procedures, will be asked to leave the facility immediately.

EMERGENCY ACTION PLANS

The company will prepare an emergency action plan for all potential emergencies, and communicate the requirements of these plans to employees. The company works with appropriate outside agencies, such as the fire department, the police department, and the hospital to write emergency plans for all potential emergencies, including:

1. Fire.
2. Explosions.
3. Severe Weather.
4. Loss of Power.
5. Bomb Threats.

6. Chemical Spills.

7. Other Potential Emergencies

Each type of emergency will be practiced at least once a year. A total site evacuation drill focusing on one emergency type, with all work shut down, and coordinated with the appropriate agency, is conducted once a year. Each drill, whether simulated or actual evacuation, is evaluated by the drill planning committee, constituted each year with two managers or supervisors and two employee volunteers. This committee's written report is posted in the lunch room, and supervisors ensure that all employees know the results. When necessary, the emergency procedures are revised as a result of the evaluation report.

EMERGENCY EXIT ROUTES

Management will ensure that the facility has sufficient exit routes for both normal use and emergency evacuation. Exit routes will be clearly marked, and they will conform to OSHA and NFPA requirements. The company will periodically audit the exit routes to assure conformance.

FIRST AID AND MEDICAL EMERGENCIES

The company evaluates the need for first aid trained employees and ensures that there are enough to meet the needs of the facility. Onsite during all shifts designated persons fully trained in cardiac pulmonary resuscitation (CPR), first aid, and the requirements of OSHA's Blood borne Pathogen Standard, are the first responders to any emergency. The company will ensure that first aid kits are stocked and readily accessible in the marked locations throughout the facility. Appropriate personal protective equipment (PPE) is provided for the different types of accidents possible at the site.

In the event of a medical emergency that requires more than first aid, employees should immediately call 911 and report the emergency to a supervisor. Employees are transported by ambulance to:

<u>Name of Medical Facility</u>	<u>Address</u>	<u>Contact Number</u>	<u>Distance From Site</u>
Columbia Memorial Hospital	71 Prospect Avenue Hudson, New York 12534	518.828.7601	26 miles
Community Hospital-Dobbs Ferry	128 Ashford Ave, Dobbs Ferry, NY	914-693-0700	2.6 miles

MEDICAL SURVEILLANCE

For work hazards that require medical surveillance, such as hearing and respiratory protection,

the company will provide monitoring. Medical health professionals, working on contract for the site, examine health surveillance data to discern changes in overall employee health screening results to discern any trends that need to be addressed. Health professionals, appropriately trained and knowledgeable about site hazards, immediately treat employees for occupational health problems and follow each case until the individual can return full-time to all aspects of his assigned job. These professionals ensure that employee medical records are kept confidentially so that diagnosis and treatment are not divulged, but management does have information about the employee under treatment as to:

1. Ability to perform job tasks.
2. Job limitations or accommodations needed.
3. Length of time the limitations must be implemented.

Management ensures that supervisors honor these restrictions. This health care is provided free of charge for all employees. The total plan is reviewed annually to assess its effectiveness.

COMPANY TRAINING REQUIREMENTS

Proper training is the key to employee safety. Management believes that employee involvement in the site's safety and health program can only be successful when everyone on the site receives sufficient training to understand what their safety and health responsibilities and opportunities are and how to fulfill them. All training time will be paid according to normal company work hour policy.

COMPANY SAFETY ORIENTATION

All new employees receive a safety and health orientation before they begin work. This training will include a review of all the company safety policies. When they have learned this material, they begin their assigned job with a trained buddy. For the first day the employee only observes the buddy doing the job and reads the appropriate job hazard analysis and work procedures. The second day the new employee performs the work, while being closely observed. The new employee may not perform work on their own until approved by the appropriate supervisor.

JOB SPECIFIC SAFETY TRAINING

In addition to the company orientation safety training, employees will be required to complete training on the various topics that are required as part of their work assignment. Their immediate supervisor is responsible for assigning this training as described in the training matrix. The employee will not be permitted to work until the requisite training is completed.

PERIODIC TRAINING

The company will provide training events, at least monthly, that cover the relevant safety topics of the workplace. The training plan will be scheduled so that employees meet all refresher requirements for their safety training. Management will solicit suggestions from employees for timely and relevant training events.

DESIGNATING TRAINERS

Management will designate trainers for the company training program. All trainers must be:

1. Designated by management.
2. Skilled at communicating important safety concepts to employees.
3. Experts in their area of work.
4. Able to recognize the hazards of the workplace and take steps to mitigate those hazards.
5. Sufficiently qualified to train employees as determined by the relevant OSHA standards.

COMPANY SAFETY POLICY REVIEW

The company safety policy will be reviewed at least annually cooperatively by both management and employee representatives. The reviewers will consider:

1. The rate of injury and illnesses in the workplace.
2. The effectiveness of written safety policies.
3. The effectiveness of company safety training.
4. The overall company safety culture.

Once the review has been completed, the group will make recommendations for improvements and assist management in setting the next years safety and health goals. Recommendations will be presented to management and made available to employees for review.

PART II: OSHA INJURY AND RECORDKEEPING PROGRAM

PURPOSE

The purpose of the C2B Injury and Illness Policy is to record all work-related injuries and illnesses. C2B is committed to providing a safe work environment for all employees. Any identified causes of these injuries will be immediately corrected. All company employees and any outside workers that are supervised by company employees are covered by this program. The OSHA Recordkeeping program is for data recording only, and is separate from the company's incident investigation and correction program.

PROGRAM COORDINATOR

Lawrence W. Cosenza is in charge of the company injury and illness recordkeeping program. The responsibilities of the coordinator are as follows:

1. Maintain the OSHA 300 Log.
2. Review and file all OSHA 301 Incident Report Forms.
3. Complete the OSHA 300A Annual Summary every January.
4. Assist managers with to determine if injuries are work related.
5. Provide training to managers and employees on the company injury and illness reporting policies.

DETERMINATION OF WORK-RELATEDNESS

An injury or illness will be considered work related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a preexisting injury or illness. Work-Relatedness is presumed for all events or exposures that occur in the work environment, unless an exception specifically applies.

EXCEPTIONS TO WORK RELATED INJURIES OR ILLNESSES

The following are exceptions to the work-related injury policy:

(i)	At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
(ii)	The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
(iii)	The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.
(iv)	The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the

	<p>employer's premises or brought in). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related.</p> <p>Note: If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.</p>
(v)	The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
(vi)	The injury or illness is solely the result of personal grooming, self medication for a non-work-related condition, or is intentionally self-inflicted.
(vii)	The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.
(viii)	The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).
(ix)	The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

WORKING FROM HOME

Injuries or illnesses that occur while an employee is working at home, including work in the home office, will be considered work-related if it occurs while the employee is working for pay, and the incident is directly related to the performance of that work. Injuries or illnesses that are caused by the general home environment and are not related to work will not be considered work-related.

TRAVELLING EMPLOYEES

An injury or illness that occurs while the employee is in work-related travel status will be considered work-related. This includes injuries that may occur in the airport or other travel location. Injuries or illnesses that occur in the hotel room or temporary residence will not be considered work related. If the employee takes personal side trips, any injury or illness that occurs there will not be considered work related.

TYPES OF INJURIES AND ILLNESSES

Any injury or illness must meet one of the following criteria in order for it to be considered recordable.

1. General Criteria

- a. Death
- b. Days away from work
- c. Restricted work or job transfer
- d. Medical treatment beyond first aid
- e. Loss of consciousness
- f. A significant injury or illness diagnoses by a licensed health care professional.

2. Needle sticks and Sharp Injuries

All work-related needle sticks will be recorded. Cuts from sharp objects that are contaminated with blood or other potentially infectious material must be recorded.

3. Medical Removal

In an employee is removed from the workplace due to a medical surveillance requirement (such as lead exposure monitoring), the case will be recorded.

4. Occupational Hearing Loss

Any employee who experiences a standard threshold shift and demonstrates a hearing level 25 decibels above audiometric zero in the same ear will be recorded as a recordable injury. If this occurs, the case will be entered in the OSHA 300 Log and referred to the company's Occupational Noise coordinator.

5. Tuberculosis

If any employee has been exposed in the workplace to someone with an active case of tuberculosis, and that person develops the disease, it will be recorded. If the cause of the infection is determined to originate from outside the workplace, it is not a recordable event.

PROCEDURE FOR SUBMITTING WORK-RELATED INJURIES AND ILLNESSES

SUPERVISOR ACTIONS

- 1. Any employee who has a work-related injury or illness must immediately report it to his or her supervisor. The supervisor will consult the injury and illness decision flowchart to determine if this is a recordable event.
- 2. If the case is determined to be recordable, the supervisor will complete an OSHA 301 Injury and Illness Report and submit it to the OSHA Recordkeeping Coordinator.

3. The supervisor will also complete a C2B Incident Report and submit it to the Institutional BioSafety Committee or Safety Manager for further investigation and root cause analysis.

RECORDKEEPING COORDINATOR ACTIONS

1. Upon receiving an OSHA 301 Form, the Coordinator will review it for accuracy.
2. Once verified, the Coordinator will enter the information into the OSHA 300 Log.
3. For cases with days away from work, restricted or transferred, on the day after the injury or illness occurs, all days will be counted, including weekends and holidays. This count will stop at 180 days, or if the employee leaves the company for a reason unrelated to the injury or illness.
4. The OSHA 301 Injury and Illness Forms will be filed with the OSHA 300 Log.
5. The Coordinator will contact the Institutional BioSafety Committee or Safety Coordinator to ensure that an in-depth investigation of the event is occurring, and that the cause will be identified and eliminated.

PRIVACY CASES

The following categories are considered to be “Privacy Cases.” For these cases, the employee name will not be entered into the OSHA 300 Log. Instead, the Coordinator will enter “Privacy Case” for the name.

1. An injury or illness to an intimate body part or the reproductive system.
2. An injury or illness resulting from a sexual assault.
3. Mental illnesses.
4. HIV infection, hepatitis, or tuberculosis.
5. Needle stick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material.
6. Other illnesses, if the employee voluntarily requests that his or her name not be entered on the log.

ANNUAL SUMMARY

Every year in January, the Coordinator will review the OSHA 300 Log and verify that all entries are complete, accurate, and up to date. Any discrepancies will be corrected. The Coordinator will complete the OSHA 300A Summary of Work Related Injuries and Illnesses.

1. Summary Certification

The annual summary will be certified by the Corporate Office . The certifier will sign the OSHA 300A form declaring it the official document.

2. Annual Summary Posting

Once certified, the annual summary will be posted for employee review at the break room. This information will be posted from February 1st to April 30th of each year.

EMPLOYEE REVIEW OF RECORDS

1. OSHA 300 Log

The company will allow any employee or authorized representative to review the OSHA 300 Log. This information will be provided by the end of the next business day after it is requested.

2. OSHA 301 Injury and Incident Report Forms

The company will allow any employee or authorized representative to review OSHA 301 Forms that describe an injury or illness that pertain to that employee. This information will be provided by the end of the next business day after it is requested.

RECORD RETENTION AND UPDATING

The OSHA 300 Log and OSHA 301 Injury and Illness Report Forms will be retained for at least five years following the end of the calendar year the records cover. The Coordinator will keep the OSHA 300 Log current to reflect any changes in classification of injuries or illnesses.

REPORTING FATALITIES OR CATASTROPHES

Any fatality or incident involving three or more hospitalizations will be reported within eight hours to OSHA. The Coordinator will contact OSHA at (518) 464-4338 or by calling 1-800-321-OSHA.

EMPLOYEE TRAINING

All employees will be trained on how to identify workplace injuries and illnesses, and the proper process for reporting them.

PART III: COMPANY FIRE PREVENTION PROGRAM

PURPOSE

The purpose of this Fire Prevention Plan is to eliminate the causes of fire, prevent loss of life and property by fire, and to comply with the Occupational Safety and Health Administration's (OSHA) standard on fire prevention, 29 CFR 1910.39. It provides employees with information and guidelines that will them in recognizing, reporting, and controlling fire hazards.

C2B is committed to minimizing the threat of fire to employees, visitors, and property. The company will comply with all applicable laws, regulations, codes, and best practices pertaining to fire prevention. The Fire Prevention Plan serves to reduce the risk of fires at the workplace by:

1. Identifying materials that are potential fire hazards and their proper handling and storage procedures.
2. Distinguishing potential ignition sources and the proper control procedures of those materials.
3. Describing fire protection equipment and/or systems used to control fire hazards.
4. Identifying persons responsible for maintaining the equipment and systems installed to prevent or control ignition of fires.
5. Identifying persons responsible for the control and accumulation of flammable or combustible material.
6. Describing good housekeeping procedures necessary to insure the control of accumulated flammable and combustible waste material and residues to avoid a fire emergency.
7. Providing training to employees on fire hazards to which they may be exposed.

PROGRAM RESPONSIBILITIES

Fire safety is everyone's responsibility. All employees should know how to prevent and respond to fires, and are responsible for adhering to company policy regarding fire emergencies.

MANAGEMENT

Management will provide adequate controls and procedures to maintain a workplace safe from fires. They will ensure that regular fire hazard assessments are performed, and that employees are protected from these hazards. Management will provide adequate resources and training to

its employees to encourage fire prevention and the safest possible response in the event of a fire emergency.

FIRE PREVENTION COORDINATOR

Larry Cosenza shall manage the Fire Prevention Plan, and shall maintain all records pertaining to the plan. This person is responsible for both the administration of the plan, and control of the fuel source hazards in the workplace. The program coordinator shall also:

1. Develop and administer the fire prevention training program.
2. Ensure that fire control equipment and systems are properly maintained.
3. Control fuel source hazards.
4. Conduct fire risk surveys and make recommendations to management and/or the safety committee.

SUPERVISORS

Supervisors are responsible for ensuring that employees receive appropriate fire safety training. They must notify the program coordinator when changes in operation increase the risk of fire. Supervisors are also responsible for enforcing the fire prevention and protection policies.

EMPLOYEES

All employees shall:

1. Complete all required training before working without supervision.
2. Conduct operations safely to limit the risk of fire.
3. Report potential fire hazards to their supervisors.
4. Follow fire emergency procedures.

PLAN IMPLEMENTATION

HOUSEKEEPING

To limit the risk of fires, employees shall take the following precautions:

1. Minimize the storage of combustible materials.
2. Make sure that doors, hallways, stairs, and other exit routes are kept free of obstructions.
3. Dispose of combustible waste in covered, airtight, metal containers.
4. Use and store flammable materials in well-ventilated areas away from ignition sources.

5. Use only nonflammable cleaning products.
6. Keep incompatible (i.e., chemically reactive) substances away from each other.
7. Perform “hot work” (i.e., welding or working with an open flame or other ignition sources) in controlled and well-ventilated areas.
8. Keep equipment in good working order (i.e., inspect electrical wiring and appliances regularly and keep motors and machine tools free of dust and grease).
9. Ensure that heating units are safeguarded.
10. Report all gas leaks immediately. The program coordinator shall ensure that all gas leaks are repaired immediately upon notification.
11. Repair and clean up flammable liquid leaks immediately.
12. Keep work areas free of dust, lint, sawdust, scraps, and similar material.
13. Do not rely on extension cords if wiring improvements are needed, and take care not to overload circuits with multiple pieces of equipment.
14. Ensure that required hot work permits are obtained.
15. Turn off electrical equipment when not in use.

MAINTENANCE OF FIRE PREVENTION EQUIPMENT

Supervisors will ensure that fire prevention equipment is maintained according to manufacturers' specifications. The company will also comply with requirements of the National Fire Protection Association (NFPA) codes for specific equipment. Only properly trained individuals shall perform maintenance work.

The following equipment is subject to the maintenance, inspection, and testing procedures:

1. Equipment installed to detect fuel leaks, control heating, and control pressurized systems.
2. Portable fire extinguishers, automatic sprinkler systems, and fixed extinguishing systems.
3. Detection systems for smoke, heat, or flame.
4. Fire alarm systems.
5. Emergency backup systems and the equipment they support.

MAINTENANCE OF SAFEGUARDS ON HEAT PRODUCING EQUIPMENT

The area supervisor is responsible for maintaining the safe guards of heat producing equipment. These safe guards prevent accidental ignition of combustible materials. This will be accomplished by following the manufacturer's maintenance requirements and NFPA recommendations.

The following equipment has special procedures for maintaining fire safety:

<u>Equipment</u>	<u>Location</u>	<u>Fire Prevention Procedures or Requirements</u>

TYPES OF HAZARDS

The following sections address the major workplace fire hazards at the company facilities and the procedures for controlling the hazards.

ELECTRICAL FIRE HAZARDS

Electrical system failures and the misuse of electrical equipment are leading causes of workplace fires. Fires can result from loose ground connections, wiring with frayed insulation, or overloaded fuses, circuits, motors, or outlets.

To prevent electrical fires, employees shall:

1. Make sure that worn wires are replaced.
2. Use only appropriately rated fuses.
3. Never use extension cords as substitutes for wiring improvements.
4. Use only approved extension cords [i.e., those with the Underwriters Laboratory (UL) or Factory Mutual (FM) label].
5. Check wiring in hazardous locations where the risk of fire is especially high.
6. Check electrical equipment to ensure that it is either properly grounded or double insulated.
7. Ensure adequate spacing while performing maintenance.

PORTABLE HEATERS

All portable heaters shall be approved by the program coordinator. Portable electric heaters shall have tip-over protection that automatically shuts off the unit when it is tipped over. There shall be adequate clearance between the heater and combustible furnishings or other materials at all times. Portable heaters will not be left on unattended.

OFFICE FIRE HAZARDS

Fires in offices have become more likely because of the increased use of electrical equipment, such as computers and fax machines. To prevent office fires, employees shall:

1. Avoid overloading circuits with office equipment.
2. Turn off nonessential electrical equipment at the end of each workday.
3. Keep storage areas clear of rubbish.
4. Ensure that extension cords are not placed under carpets.
5. Ensure that trash and paper set aside for recycling is not allowed to accumulate.
6. Spills will be cleaned up immediately.

CUTTING, WELDING, AND OPEN FLAME WORK

Larry Cosenza will ensure the following:

1. All necessary hot work permits have been obtained prior to work beginning.
2. Cutting and welding are done by authorized personnel in designated cutting and welding areas whenever possible.
3. Adequate ventilation is provided.
4. Torches, regulators, pressure-reducing valves, and manifolds are UL listed or FM approved.
5. Oxygen-fuel gas systems are equipped with listed and/or approved backflow valves and pressure-relief devices.
6. Cutters, welders, and helpers are wearing eye protection and protective clothing as appropriate.
7. Cutting or welding is prohibited in sprinkler areas while sprinkler protection is out of service.
8. Cutting or welding is prohibited in areas where explosive atmospheres of gases, vapors, or dusts could develop from residues or accumulations in confined spaces.
9. Cutting or welding is prohibited on metal walls, ceilings, or roofs built of combustible sandwich-type panel construction or having combustible covering.
10. Confined spaces such as tanks are tested to ensure that the atmosphere is not over ten percent of the lower flammable limit before cutting or welding in or on the tank.
11. Small tanks, piping, or containers that cannot be entered are cleaned, purged, and tested before cutting or welding on them begins.
12. Fire watch has been established.

FLAMMABLE AND COMBUSTIBLE MATERIALS

The program coordinator shall regularly evaluate the presence of combustible materials in the workplace.

Certain types of substances can ignite at relatively low temperatures or pose a risk of catastrophic explosion if ignited. Such substances obviously require special care and handling.

Class A Combustibles

These include common combustible materials (wood, paper, cloth, rubber, and plastics) that can act as fuel and are found in non-specialized areas such as offices.

To handle Class A combustibles safely:

- a) Dispose of waste daily.
- b) Keep trash in metal-lined receptacles with tight-fitting covers (metal wastebaskets that are emptied every day do not need to be covered).
- c) Keep work areas clean and free of fuel paths that could allow a fire to spread.
- d) Keep combustibles away from accidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices.
- e) Store paper stock in metal cabinets.
- f) Store rags in metal bins with self-closing lids.
- g) Do not order excessive amounts of combustibles.
- h) Make frequent inspections to anticipate fires before they start.

Water, multi-purpose dry chemical (ABC), and halon 1211 are approved fire extinguishing agents for Class A combustibles.

Class B Combustibles

These include flammable and combustible liquids (oils, greases, tars, oil-based paints, and lacquers), flammable gases, and flammable aerosols.

To handle Class B combustibles safely:

- a) Use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets).
- b) Do not dispense Class B flammable liquids into containers unless the nozzle and container are electrically interconnected by contact or by a bonding wire. Either the tank or container must be grounded.
- c) Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks.
- d) Do not use a flammable liquid as a cleaning agent inside a building (the only exception is in a closed machine approved for cleaning with flammable liquids).

- e) Do not use, handle, or store Class B combustibles near exits, stairs, or any other areas normally used as exits.
- f) Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles.
- g) Do not generate heat, allow an open flame, or smoke near Class B combustibles.
- h) Know the location of and how to use the nearest portable fire extinguisher rated for Class B fire.

Water should not be used to extinguish Class B fires caused by flammable liquids. Water can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid. The following fire-extinguishing agents are approved for Class B combustibles: carbon dioxide, multi-purpose dry chemical (ABC), halon 1301, and halon 1211.

SMOKING

Smoking is prohibited in all buildings. Certain outdoor areas may also be designated as no smoking areas. The areas in which smoking is prohibited outdoors are identified by NO SMOKING signs.

ADDITIONAL FIRE HAZARDS

Additional fire hazards and their control measures are documented on company fire hazard analysis record forms.

TRAINING

The Designated Trainer shall present basic fire prevention training to all employees upon employment, and shall maintain documentation of the training, which includes:

1. Review of 29 CFR 1910.38, including how it can be accessed.
2. This Fire Prevention Plan, including how it can be accessed.
3. Good housekeeping practices.
4. Proper response and notification in the event of a fire.
5. Instruction on the use of portable fire extinguishers (as determined by company policy in the Emergency Action Plan).
6. Recognition of potential fire hazards.
7. The company Emergency Action Plan for fires.

Supervisors shall train employees about the fire hazards associated with the specific materials and processes to which they are exposed, and will maintain documentation of the training. Employees will receive this training:

1. Prior to starting work.
2. Annually.
3. When changes in work processes necessitate additional training.
4. If an employee demonstrates poor understanding of fire prevention practices.

PROGRAM REVIEW

The program coordinator and the safety committee shall review this Fire Prevention Plan at least annually for necessary changes.

PART IV: HAZARD COMMUNICATION

PURPOSE

The management of (C2B) is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable federal and state health and safety rules and provide a safe, healthful environment for all our employees.

This written hazard communication plan will be available at the following location for review by all employees: (All work locations).

The company Hazard Communication Program Coordinator is (Larry Cosenza) and can be contacted at (518.537.7678 / mobile: 205.586.9163)

CONTAINER LABELING

The Area Supervisor will verify that all containers received for use will:

- Be clearly labeled as to the contents
- Have the appropriate hazard warning
- List the manufacturers name and address

It is the policy of the company that no chemicals will be released for work until this information is verified. The supervisor of each work area will ensure that all secondary containers are labeled, and identify the chemical name and appropriate hazard warning.

MATERIAL SAFETY DATA SHEETS

Copies of Material Safety Data Sheets for all hazardous chemicals to which employees of this enterprise may be exposed will be stored at:

1. C2B Operation, Greenville, NY
2. C2B Headquarters, Germantown, NY

MSDSs will be available to all employees in their work area for review during each work shift. If MSDSs are not available or new chemicals in use do not have an MSDS, employees may not use the chemical, and they will immediately contact Larry Cosenza.

EMPLOYEE INFORMATION AND TRAINING

Prior to starting work, each new employee of (C2B) will attend a health and safety orientation and will receive information and training on the following:

- An overview of the requirements contained in 1910.1200 – Hazard Communication Rule.
- Chemicals present in their workplace operations.
- Location and availability of our written hazard communication program.
- Physical and health effects of the hazardous chemicals.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to these hazardous chemicals through the use of control/work practices and personal protective equipment.
- Steps the enterprise to reduce or prevent exposure to the chemicals.
- Safety emergency procedures to follow if they employee is exposed to these chemicals.
- How to read labels and review MSDSs to obtain proper hazard information.

After completing the training class, each employee will sign a form to verify they attended the training and understood the policies on hazard communication.

Prior to a new hazardous chemical being introduced into any area of this workplace, each employee of that area will be given training as outlined above. Larry Cosenza is responsible for ensuring that MSDSs on any new chemicals are available.

HAZARDOUS CHEMICAL LIST

The following is a list of all known hazardous chemicals used (C2B) employees. More information on each chemical noted is available by reviewing the MSDSs.

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees must perform hazardous non-routine tasks. Before starting work on such projects, each affected employee will be given information by the owner or area supervisor about hazardous chemicals to which they may be exposed during such activity.

This information will include:

- Specific chemical hazards.
- Protective/safety measures employees can take.
- Measures the enterprise has taken to reduce the hazard, including ventilation, respirators, presence of other employees, and emergency procedures.

CHEMICALS IN PIPES

Some work activities are performed by employees in areas where chemicals are transferred through pipes. Prior to starting work in these areas, employees will contact Larry Cosenza for information regarding:

- The chemicals in the pipes, or the insulation material on the pipe.
- Potential hazards.
- Safety precautions to be taken.

INFORMING CONTRACTORS

It is the responsibility of Larry Cosenza to provide contractors the following information:

- Hazardous chemicals to which they may be exposed to while on the job site, and the procedure for obtaining MSDSs.
- Precautions employees may take to lessen the possibility of exposure, by using appropriate protective measures, and an explanation of the labeling system used.

It is the responsibility of Larry Cosenza to identify and obtain MSDSs for the chemicals that contractors bring into the workplace.

PART V: PERSONAL PROTECTIVE EQUIPMENT

PURPOSE

The Personal Protective Equipment (PPE) Plan provides direction to managers, supervisors, and employees about their responsibilities in the selection, use, care and disposal of personal protective equipment.

GENERAL.

Personal protective equipment and devices should be used only when it is impossible or impractical to eliminate a hazard or control it at its source through engineering design. Wearing personal protective equipment does not eliminate the hazardous condition.

Every effort will be made to first eliminate the hazardous condition through engineering and/or administrative control strategies. If it is not possible or feasible to eliminate hazardous conditions, personal protective equipment will be used to establish a barrier between the exposed employee and the hazard to reduce the probability and severity of an injury.

RESPONSIBILITY AND ACCOUNTABILITY.

Managers are responsible to ensure supervisors conduct worksite/task analyses to identify hazardous conditions that may or may not be eliminated through engineering or administrative controls. In those tasks that expose employees to hazardous conditions which cannot be eliminated through engineering or administrative controls, managers will implement and monitor this plan to ensure area supervisors are properly trained, supervised and enforce PPE safety rules.

Supervisors are responsible, if directed, to carry out the provisions of this plan.

They will:

1. Conduct worksite/task analysis initially and as needed to assess the need for personal protective equipment. Sources of hazards include:
 - a. Hazards from impact/motion, high/low temperatures, chemicals, materials, radiation, fall objects, sharp objects, rolling or pinching objects, electrical hazards, and workplace layout.

2. Certify in writing the tasks evaluated, hazards found, and actions recommended:
Engineering controls, administrative controls, PPE.
3. Select appropriate PPE. If a task exposes an employee to hazards which cannot be eliminated through engineering or administrative controls, the supervisor will identify and select PPE suitable for the specific task performed, conditions present, and frequency and duration of exposure.
 - a. Supervisors are encouraged to take advantage of the services provided by OSHA consultants, our workers' compensation insurer consultants, and PPE suppliers for expert assistance in selecting PPE.
 - b. Supervisors should invite exposed employees to participate in PPE selection. Employees need to give feedback to the supervisor about the fit, comfort, and suitability of the PPE being selected.
4. Train exposed employees before they are assigned to the hazardous task.
 - a. Training should include:
 - (1 When PPE is necessary;
 - (2 What PPE is necessary;
 - (3 How to properly don, doff, adjust, and wear PPE;
 - (4 The limitations of the PPE; and
 - (5 The proper care, maintenance, useful life, and disposal of PPE.
 - b. After the employee(s) demonstrate correct use, care, and disposal procedures of the PPE, the supervisor and employee will certify completion of training.
5. Supervise employees on safe use and care of PPE. Supervisors will regularly monitor employees for correct use and care of PPE, and provide follow-up training if required to ensure each employee has adequate skill, knowledge, and ability to use PPE.
6. Enforce PPE safety rules. Supervisors will enforce PPE safety rules following provisions of the company progressive discipline policy.

Employees are accountable to comply with PPE safety rules including:

1. The correct use and care of PPE.
2. Reporting changes in exposure to hazardous conditions that might require a follow-up analysis of the task for PPE.
3. Reporting and replacing defective PPE.

PPE SELECTION GUIDELINES

EYE AND FACE PROTECTION

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation. Eye and Face PPE must comply with ANSI Z87.1-1989 or be demonstrated to be equally effective.

HEAD PROTECTION

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects. Protective helmets designed to reduce electrical shock hazards will be worn by each employee when near exposed electrical conductors which could contact the head. Helmets will comply with ANSI Z89.1-1986 or be equally effective.

FOOT PROTECTION

Employees must wear protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or from object piercing the sole, and where employees' feet are exposed to electrical hazards. PPE for foot protection must comply with ANSI Z41.1991 or be equally effective.

HAND PROTECTION.

Employees must use appropriate hand protection when their hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns and harmful temperature extremes. Supervisors must base the selection of hand protection on evaluation of the performance characteristics of the hand

protection relative to the specific tasks to be performed, conditions present, duration of use and the hazards and potential hazards identified.

RESPIRATORY PROTECTION

Employees will wear appropriate respiratory protection when adequate ventilation or substitution with non-toxic chemicals, etc., is not possible or feasible. Respirator protection must comply with ANSI Z288.2-1969 and provisions detailed in 29 CFR 1910.134.

FALL PROTECTION

Fall protection must be provided when employees are exposed to (1) a vertical fall of six feet or more over a lower level or (2) any height over dangerous equipment. Fall protection will consist of either passive or active fall protection. Fall protection must comply with ANSI A10.14-1991.

ELECTRICAL PROTECTION

Electrical protective equipment such as insulating blankets, mating, covers, line hoses, gloves, gloves and sleeves must be provided to employees who are exposed to electrical hazards. Electrical protective equipment will comply with the requirements in 29 CFR 1910.137.

MONITORING AND REVIEW

Supervisors will monitor worksite tasks for changes in, or the introduction of new hazards. If new hazards are discovered, they will conduct a task analysis for appropriate PPE. A worksite analysis will be conducted at least annually for each task that requires employees to use PPE.

The safety committee or equivalent entity will monitor the effectiveness of this plan and make recommendations to management to improve the plan.