



CORPORATE SAFETY POLICY

2014

OCCUPATIONAL HEALTH AND SAFETY POLICY STATEMENT

The management of LEN CORCORAN EXCAVATING LTD is committed to keeping our jobsites safe and healthy for our employees. We personally assure you that the Company will make every reasonable effort to provide a safe and healthy work environment. In order to keep our work areas safe everyone including the management, supervisors and workers must be committed to reducing the risk of injury at all times.

MANAGEMENT and SUPERVISORS are required by law to follow and enforce the Occupational Health and Safety Act and Construction Regulations as well as the safety policies of the Company and they can be held accountable if they fail to do so. They are responsible for making sure everyone works in a safe manner, wears protective equipment, follows safe operating procedures and ensure workers are properly trained to do the job safely. Managers and supervisors must take every reasonable action to make sure that everyone on the site is working in a safe environment.

WORKERS are also required by law to follow the rules of the Occupational Health and Safety Act and Construction Regulations as well as the safety policies of the company and can also be held accountable if they fail to do so. Workers are required to wear protective equipment, follow safe operating procedures and to report any defects in equipment that would make the jobsite unsafe. Workers who do not follow these rules can be fined or could face imprisonment under the Occupational Health and Safety Act. They could also face Company discipline up to and including job termination.

It is in the best interest of everyone to think about safety in every activity. Commitment to Health and Safety must form an integral part of this Company from the President through to the workers.

(President)

(Date)

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1. LCE 2013 SAFETY TARGETS

- * Maintain 2012-2013 goal of 100% compliance from ENTIRE workforce with respect to hardhat usage and wearing of safety vests on all Len Corcoran Excavating job-sites
- * As required by OHSA, Len Corcoran Excavating will conduct an annual review of our corporate safety policy with the entire workforce
- * Conduct required re-certification and training (i.e. first-aid, propane, fall-arrest, WHMIS, confined spaces etc.)
- * Review the implementation of our Confined Space program and conduct refresher and hands on rescue training with 'confined space teams'
- * Continue to enforce daily hazard awareness discussions onsite delivered by the supervisor or their designate
- * Begin to cultivate awareness about MSDs and their prevention
- * Focus efforts on creating safe workplaces that meet or exceed legal requirements and not on merely meeting industry standards

2. RESPONSIBILITIES

Health and safety activities are based on specific individual responsibilities. Most of these responsibilities can be found in the Occupational Health and Safety Act and in the Regulations for Construction Projects. Outlined are details of responsibilities in the workplace to assist in carrying out health and safety functions. All individuals in the Company are responsible for understanding and carrying out their duties and responsibilities.

RESPONSIBILITIES ARE ASSIGNED TO THE FOLLOWING PARTIES:

- Constructor
- Employer
- Supervisors
- Workers
- Subcontractors
- Health and Safety Representatives
- Health and Safety Coordinator

The CONSTRUCTOR shall ensure that:

- Appropriate documentation for project startup has been processed
- Measures and procedures required by the Occupational Health and Safety Act and Regulations of Construction Projects are carried out
- Employers and employees on the project comply with the Act and Regulations
- Health and safety of employees on a project is protected by following the Safety Policy as stated
- Establish for the project written emergency procedures and post them in a conspicuous location
- Ensure that these procedures have been reviewed with the Onsite Supervisor and Site Health & Safety representative

The EMPLOYER shall ensure that:

They fulfill the duties for Employers outlined in the Occupational Health & Safety Act Sections 25 & 26 including the following:

- Workers have been provided information, trained and supervised to protect their safety
- A competent person is appointed as the supervisor
- Support & assistance are provided to the Joint Health & Safety Committee, Site Health & Safety Representatives and the Health & Safety Coordinator in the carrying out of any of their functions
- Every reasonable precaution is taken for the protection of workers
- Develop a health and safety program that is updated, maintained and reviewed annually with all of the Joint health & Safety Committee, Supervisors and the Workforce
- Post in a conspicuous location a copy of the Corporate health & Safety Policy and the Occupational Health & Safety Act and regulations for Construction Projects

- Provide safety equipment required by law and maintain said equipment to protect the safety of the Workforce
- Conduct company safety meetings monthly
- Provide training to the workers, Supervisors and JHSC as needed and keep record of this training on file at the Office. At minimum an annual review of the Corporate safety Policy, OHS & Construction Regulations, WHMIS, First Aid training and Confined Space Hazard Awareness Refresher courses will be held

The SUPERVISOR shall ensure that:

- Their workers work in the manner and with the protective devices, measure & procedures required by the Occupational Health & Safety Act, Regulations for Construction Projects and the Corporate Health & Safety Policy
- The worker wears the personal protective equipment and other protective devices provided and required by the Employer
- They advise workers immediately if they become aware of the existence of any potential or actual dangers to the health & safety of the worker
- They take every precaution reasonable in the circumstances for the protection of the worker
- The workers are aware of the site-specific emergency procedures, hazards and traffic control procedures
- They supervise the work on their site at all times or, if they must leave the site, appoint someone in charge who is a competent person as defined in Section 1 (1) of the Occupational Health & Safety Act
- They submit paperwork and follow procedures as outlined in the Corporate Health & Safety Policy
- All accidents are reported to management immediately
- Sub-trades are familiar with and work in a manner with protective equipment and procedures as required by the Occupational Health and Safety Act and the Corporate Health & Safety Policy
- They perform weekly inspections of their jobsites and record completion and any findings in their daybook
- They support and assist the Site Health & Safety Representative in the completion of their duties and functions
- All disciplinary warnings given to workers are appropriately conducted and documented according to Section 4 of this Policy

The WORKER shall:

- Work in compliance with the Occupational Health and Safety Act and the Regulations for Construction
- Take every reasonable precaution to prevent accidents
- Use or wear all equipment, protective devices or clothing that the Employer or Constructor requires to be used or worn
- Not use or operate any equipment, machine, device or thing or work in a manner that will endanger anyone
- Report to their supervisor any breaking of the Occupational Health & Safety Act, Construction Regulations or Corporate Health & Safety Policy or the existence of any hazard of which the worker is aware
- Report unsafe situations such as absence or defect in any equipment or protective device of which the worker is aware immediately to the supervisor

- Report illness or injury immediately to the supervisor and to the office
- Help new employees recognize hazards and follow proper procedures and answer questions from fellow employees to which they know the answer
- Be aware that disciplinary action will be carried out if Company Safety rules, Corporate Health & Safety Policy, Occupational Health & Safety Act, or Construction Regulations are not followed

The SUBTRADES shall:

- Work in compliance with the Occupational Health & Safety Act, Construction Regulations and the Len Corcoran Excavating Corporate Health & Safety Policy
- Take every reasonable precaution to prevent accidents
- Not use or operate any equipment, machine, device or thing or work in a manner that will endanger anyone
- Report unsafe situations such as absence or defect in any equipment or protective device of which the worker is aware immediately to the Len Corcoran Excavating Onsite Supervisor
- Use or wear all equipment, protective devices or clothing that the Constructor requires to be used or worn

The HEALTH AND SAFETY REPRESENTATIVE shall:

- Attend and participate in all Company-sponsored safety training to maintain familiarity with the Occupational Health and Safety Act and the Regulations for Construction Projects
- conduct monthly workplace inspections and identify sources of danger; all observations should be reported to the Supervisor and recorded in representative's day-timer
- relay concerns of workers and make recommendations to the Employer and the Health & Safety Coordinator

The HEALTH & SAFETY COORDINATOR shall:

- maintain records of training, inspections, disciplinary warnings, injuries and reports at the Office
- ensure the Corporate Safety Policy is kept up-to-date, enforceable and reflects any rule changes
- conduct an annual safety policy review with the workforce
- liaise between all workplace members who have responsibilities under this Policy. Includes answering questions, researching solutions and providing council

3. COMPANY HEALTH AND SAFETY RULES

In addition to the rules of the Occupational Health and Safety Act and the Construction Regulations the following safety rules must be followed as a condition of employment with Len Corcoran Excavating Ltd. Disciplinary action will be carried out if any of these rules are not followed

- ☪ All managers, supervisors and workers must be trained on and be familiar with the most recent version of the Occupational Health and Safety Act and Construction Regulations sections that apply to their particular work activities
- ☪ All workers must be trained on and become familiar with the Company's Health and Safety Program and comply with the Safe Work Procedures
- ☪ All supervisors must carry out the Company's Enforcement Policy as noted in the following section
- ☪ All managers, supervisors and workers shall be especially familiar with the regulations relating to trenching, sloping and shoring
- ☪ Every work related accident must be immediately reported to the supervisor
- ☪ Any hospital visit related to a workplace incident must be reported to the office **immediately** by calling 613-542-0820 or 613-548-7604 (Note that 613-542-0820 will allow you to reach someone in the evenings or on weekends)
- ☪ Everyone entering the workplace must wear as a minimum a CSA approved hardhat and CSA approved footwear.
- ☪ An approved fluorescent safety vest must be worn at all times when the jobsite could involve vehicular or construction equipment traffic
- ☪ Additional protective equipment must be worn when required
- ☪ No employee shall work in a manner that will endanger anyone
- ☪ The use of drugs or alcohol or persons under the influence of drugs or alcohol will not be permitted on the jobsite
- ☪ Ensure that all Ministry of Labour Officers are accompanied by the supervisor or his designate while on the jobsite
- ☪ Any worker that visits the hospital must be accompanied by another employee where possible and must have the doctor sign a Modified Work Form. These forms are available from the Onsite Supervisors' Safety Binders
- ☪ Horseplay & fighting are forbidden on company jobsites
- ☪ Firearms are not permitted on Corcoran Excavating jobsites or property
- ☪ Len Corcoran Excavating prides itself on excellent relations with the public. Our employees are front-line advertising for this company on a daily basis so we expect polite and courteous interaction with the public at all times

4. ENFORCEMENT POLICY

All employees must comply with the rules of the Occupational Health and Safety Act and the Regulations as well as the Safe Work Procedures in Section 8 and the Safety Policy of Len Corcoran Excavating Ltd. If these rules and policies are violated, the Company has implemented the following disciplinary actions:

LEVEL 1 WARNING

- will be given where the Supervisor interprets the violation to be of a minor nature and does not endanger the safety of any person or is a first offense
- disciplinary action will consist of a safety talk regarding the severity of the incident, ramifications of the offense and how to avoid further offenses
- Supervisors will document (by way of signatures and brief description) that the safety talk has occurred. A copy of this record will be kept in the employee's file

LEVEL 2 FORMAL WRITTEN WARNING

- will be given where the Supervisor interprets the violation to be of a major nature that directly endangers the safety of a person on the jobsite or is a second offense
- disciplinary action will consist of a safety talk regarding the incident and a possible suspension
- a written Notice of Infraction will be issued and a copy will be kept on file
- repeat violations requiring written warnings will lead to suspension and possibly to job termination

NOTICE OF SERIOUS INFRACTION (RED WARNING)

- will be given where the Supervisor interprets the violation to be life threatening to one or more individuals on the jobsite
- disciplinary action will consist of a safety talk regarding the incident and an immediate suspension or job termination

****NOTE**** The following are exceptions to the enforcement policy:

- Employees caught operating LCE licensed vehicles without a valid driver's license or with a driver's license under suspension **WILL BE FIRED IMMEDIATELY**
- Employees entering a confined space without confined space training **WILL BE FIRED IMMEDIATELY**
- Employees entering a confined space who **have** training but are not following all of the required procedures will receive a 3 day suspension without pay. Any further offenses will result in job termination
- Supervisors who knowingly or unknowingly allow an illegal confined space entry to happen on their site will receive a one-week suspension without pay. Any further offenses will result in job termination.

5. HEALTH AND SAFETY TRAINING

The management of LEN CORCORAN EXCAVATING LTD is committed to ensuring that all employees be adequately trained to perform their job safely. The Company believes that training is crucial to establish and maintain the high standards we expect for performing job functions. Training records for each employee shall be managed by the Health & Safety Coordinator and kept on file at the Office.

Training shall include as required:

- Overview of the Occupational Health and Safety Act and the Regulations for Construction Projects
- Review of the Company's Health and Safety Program (annually for all workers)
- WHMIS Information and Reviews (annually for all workers)
- Specific Supervisor Training
- New Worker Training (for all new workers)
- Trenching and Shoring Techniques
- Use of Personal Protective Equipment
- Confined Space Entry
- Traffic Control
- First Aid and CPR (minimum of one trained first aider for every 5 workers onsite)
- 20 Minute Monthly Safety Meetings (monthly- at office by management)
- Hazard Awareness Discussions- (daily- onsite by supervisor or designate)

6. WHMIS

(Workplace Hazardous Material Information System)

WHMIS is a Canada-wide system designed to protect workers by providing information about hazardous materials on the jobsite. This system is administered through a three-pronged approach including **labels** on containers of hazardous materials, **Materials Safety Data Sheets (MSDSs)** providing further detailed information and **worker training** on how to use the information on the labels and in the MSDSs. It is the **law** that all Supervisors and Workers must receive construction-specific WHMIS training and then participate in an annual WHMIS review course delivered by qualified instructors.

The Employer will ensure that all hazardous materials on the jobsite are correctly labeled and that their MSDS is onsite and available for review by the worker. MSDS must be updated every **three years** and are brand & product specific. A MSDS for Chevron oil **cannot be used** for Texaco oil as the formulation & ingredients may be different. It is the *worker's responsibility* to report to the Supervisor or the Health & Safety Coordinator any illegible or missing supplier labels or missing or out-of-date MSDS Sheets. The Health & Safety Coordinator will then provide a workplace label until a supplier label can be produced or will procure the required MSDS. Workers who purchase or pick-up materials with WHMIS labels are asked to request MSDS from the supplier at the time of pick-up to help ensure current MSDS are available onsite.

For a chart of WHMIS classes & symbols please refer to the Procedures Section of this Health & Safety Policy.

There are four ways a worker can be exposed to hazardous materials: **Inhalation** (most common- from dust & vapors, smokers are especially at risk), **Absorption** (through the skin- many solvents fall into this category and can get into the bloodstream or cause dermatitis), **Ingestion** (seems unlikely, but chemicals on your skin are easily transferred to food or cigarettes without proper hand-washing), and **Injection** (through accidental punctures from nails or staples or high pressure hoses).

Len Corcoran Excavating recognizes the potential damage to employee health from prolonged & repeated exposure to hazardous materials. We are therefore committed to controlling hazards at the source if possible through the elimination of the hazard by the substitution of a safer product or process. For example when cutting concrete dust is a potential health hazard. By wet cutting instead of dry cutting we are eliminating this hazard at the source. If it is not possible to eliminate at the source we will attempt to control along the path by placing a barrier between the worker and the hazard. An example would be providing local or specific ventilation or providing a barrier or screen. The final method for hazard control is control at the worker. This method involves using personal protective equipment and is less desirable because it relies heavily on the worker's understanding of the proper use of the PPE, their specific training and understanding and the Supervisor to monitor proper use. If a control at the worker is being used it is important that **all workers** potentially exposed to the hazard wear PPE. This means that not only should the worker running the saw wear a mask and earplugs but others nearby who may be exposed to the dust or noise as well.

7. NEW WORKER ORIENTATION

Inexperienced workers are generally involved in more accidents than veteran workers. Although experience increases safety awareness, early education in health, safety and job skills can improve the safety record of new employees right from the start.

New worker orientation shall include:

- review and discussion of the Company Health and Safety Policy with the Health & Safety Coordinator
- introduction to the Supervisor, workers, Site Health and Safety Representative and identification of co-workers trained in first aid
- identification of the jobsite with specific attention to hazards
- location of first aid equipment, fire extinguishers, phone and toilet
- explanation of emergency procedures
- site specific WHMIS requirements
- Description of the location of site safety binder, WHMIS sheets, safe work procedures and copy of OHS & Construction Regulations

8. HAZARD AWARENESS DISCUSSIONS

These discussions will be held **DAILY** onsite before work commences. The supervisor or their designate shall review hazards specific to the worksite or work being conducted that day or the discussion will constitute a review of 'best practices' for routine work activities such as digging around underground plant, confined space entry, trenching etc. While the supervisor is free to use the "safety Talks" reference book provided, they are encouraged to respond to the dynamic conditions found on our sites. This forum is also the place to review MOL site visits/inspections, near misses, and other safety concerns. The discussion leader will provide an opportunity for questions and clarification and all questions will be answered carefully.

The topic of the daily hazard awareness discussion will be recorded on the supervisor's daily sheet. Attendees will also sign the separate record sheet that has space for attendance lists for an entire week and will keep this list onsite in the job binder. Once the job is complete the job binder will be submitted to the office where it will be kept on file in case it is needed to form the basis for a Due Diligence defense in the future.

The Company will ensure that copies of all relevant Safe Work Procedures are available at each worksite and that they are updated annually or as necessary. Through these Hazard Awareness Discussions the Employee shall become completely familiar with all of the Safe Work Procedures.

9. TRENCHING SAFETY

The guidelines with respect to trenching and excavations are described in Part III of the Construction Regulations beginning with Section 222. As a significant number of the injuries and deaths in the heavy construction- civil construction sector are directly related to trenching (primarily due to cave-ins), it is absolutely imperative that all workers who may enter excavations read and are familiar with, at minimum, this section of the Corporate Safety Policy. Safety Talks about trenching will be popular topics for weekly tailboard talks and monthly Corporate Safety Meetings.

As indicated in Section 228 of the Construction regulations, it is the responsibility of the Employer conducting the excavation to ensure that all underground gas, electrical or other services are accurately located and marked by the owner of the service before an excavation is begun. This procedure usually consists of paint markings on the ground accompanied by a drawing provided by the service's owner. A copy of the service locates will be kept onsite and reviewed with the machine operator and swamper before commencing an excavation.

The rules concerning sloping and safe structure of an excavation depend on the soil type being excavated. The details are laid out in Section 226 of the Construction Regulations but in general:

● **Rock Trenches**

- Excavations made by hydraulic breakers or blasting in previously unexcavated rock
- Banks can be vertical all the way to the top provided they are scaled to protect workers from loose rocks

● **Type 1 Soil**

- Is hard and can only be excavated by mechanical equipment
- Has low internal moisture content and a high degree of internal strength
- Has no sign of moisture seepage
- Beyond a depth of 1.2m the slope should be 1:1

● **Type 2 Soil**

- Is very stiff and dense and can be penetrated with moderate difficulty by a small sharp object
- Has low to medium moisture content and medium degree of internal strength
- Has a damp appearance after it has been excavated
- Beyond a depth of 1.2m trenches should be sloped 1:1

● **Type 3 Soil**

- Exhibits signs of surface cracking
- Exhibits signs of water seepage
- When dry may run into a conical pile
- Example: previously excavated soils
- Trenches should be sloped from the bottom of the ditch at 1:1

● **Type 4 Soil**

- Runs easily or flows

- Is wet or muddy
- Exhibits almost no internal strength
- Example: loose sand
- Trenches must be sloped from the bottom with a minimum gradient of 3:1

If the worksite restrictions does not allow for the sloping described above, a worker is required to enter the excavation **and** the excavation is more than 1.2 meters deep then that excavation must be supported by a support system that complies with Sections 235 through 239 and 241 of the Construction Regulations (please refer to these sections for details).

If the excavation occurs in a mixture of soil types, then the soil shall be qualified as the highest number present (i.e. if Types 1, 3 and 4 soils are present then the soil will be classified as Type 4)
Every excavation a worker is required to enter:

- Shall be kept free of water
- Shall have the walls stripped free of loose rock or other material that may slide or fall on the worker
- Shall have a level area extending at least one meter from the edge of the excavation kept free of equipment, excavated material, rock or construction materials

No machines are to be operated in such a way that they endanger the stability of the walls of an excavation. It is particularly important to keep vibratory compaction equipment away from the edge of an excavation a distance that is equal to the depth of the excavation.

It should be noted that excavations required to be left open for an extended duration (and especially following heavy rain) may collapse without apparent reason. This applies for all soil types except rock trenches.

For company procedures for excavations and procedures for conduct in the event of contact with underground plant please refer to *Procedures to Accompany Safety Policy* attached.

In conclusion, no worker should enter a trench without understanding the soil type and ensuring the slope is adequate. If you are unsure ask your supervisor and if you are still not sure contact the Health & Safety Coordinator.

10. CONFINED SPACE POLICY

Purpose: to ensure that all employees of Len Corcoran Excavating are able to recognize all confined spaces and be aware of the applicable hazards and plans for entering a confined space

Definitions: for the purposes of this policy these are the applicable terms and definitions

Atmospheric Hazard:

- a) the accumulation of flammable, combustible or explosive agents
- b) An oxygen content in the atmosphere that is less than 19.5% or more than 23% (by volume)
- c) The accumulation of atmospheric contaminants including gases, vapors, fumes, dusts or mists that could,
 - i. Result in acute health effects that pose an immediate threat to life
 - ii. Interfere with a person's ability to escape unaided from a confined space

Competent Person: for the purpose of confined space work is someone authorized by the supervisor and,

- a) has knowledge of all the regulations and this program and its associated documents
- b) Is familiar with the work

Confined Space: means a fully or partially enclosed space that meets **both** of the following criteria,

- a) That is not both designed and constructed for continuous human occupancy
- b) In which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it

Restricted Space: we accept the Utilities Kingston definition of a restricted space as any space that has limited access or egress but does not have any potential atmospheric hazard

Hot Work: work that is capable of producing a source of ignition

Confined Space Inventory & Identification: Since the confined spaces typically entered by Len Corcoran Excavating depend on current contracts, we do not have an inventory of permanently occurring confined spaces maintained by us. Len Corcoran Excavating has developed 6 categories of Confined Spaces (Appendix A) that describes the defining characteristics of each type and provides a framework for assessing potential hazards. If a team in the field encounter a confined space that does not fall into any of these categories they shall fill out an entirely new assessment, develop a plan and notify the office of the new confined space so a new group can be created

Confined Space Assessment

Prior to any worker entering a confined space (note that as per the OSHA "entering" refers to any part of the worker's body breaking the plane of the confined space), an adequate assessment of the hazards related to the confined space shall be completed by a competent person. The hazards assessment will identify both those hazards that exist due to design, construction, location, use or contents of the confined space and the hazards that may develop while work is done inside the confined space.

The confined space assessment shall be conducted using Len Corcoran Excavating's Confined Space Assessment Form. Only persons authorized by a Supervisor or Manager can be deemed competent to complete this assessment

Any time a person must enter a confined space they shall determine if an assessment exists, obtain a copy of the assessment and review it. Any time a person enters a confined space for which an assessment is not completed they shall ensure that the supervisor is made aware that an assessment has not been completed. The supervisor will ensure that an assessment is completed and submitted to the Health & Safety Coordinator at the Office.

Confined Space Plan

Prior to any work entering a confined space, the worker shall be knowledgeable and understand the contents of the Len Corcoran Excavating Confined Space Plan (Appendix B). The plan includes:

- a. the duties of the entrant and attendant
- b. Co-ordination documents with other employers if applicable
- c. On-Site rescue procedures
- d. Protective clothing and personal equipment and device requirements
- e. Requirements for isolation of energy and control of materials movement
- f. Designation of an attendant(s)
- g. Atmospheric testing requirements
- h. Ventilation & purging requirements

The plan will outline the general requirements for entry and the need to review the assessment for specific requirements to include in the entry permit

Confined Space Entry Permit

Every time an employee is required to enter a confined space an Entry Permit must be completed. All Len Corcoran Excavating staff shall use Len Corcoran Excavating Entry permit unless they are not the lead employer and are working under the coordination plan of another lead employer.

The entry permit shall be verified by a competent person and shall remain at the site of the confined space entry the entire time any work in or associated with the entry is being completed

Rescue Plan

A rescue plan shall be written and included in the Confined Space Entry permit. The Rescue Plan shall ensure that workers are able to facilitate a rescue without relying solely on emergency services. The plan shall ensure that all equipment and the adequate number of persons required to conduct a rescue are identified in the plan.

Any rescue equipment determined to be required as indicated on the plan shall be available and ready for use the entire time that anyone is in the confined space.

No person shall enter a confined space unless a plan outlines an adequate means of rescue.

Training

All Len Corcoran Excavating staff who enter, act as an attendant or act as a rescuer shall, at a minimum, have a general Confined Space Training Session once every 5 years. This training shall include instruction on the hazards associated with confined spaces, gas monitoring and a general understanding of the regulated requirements.

All Len Corcoran Excavating workers who enter, act as an attendant or act as a rescuer shall **annually** review the requirements of this program. Prior to any entry into a confined space any persons acting as an attendant, entrant or rescuer shall review the contents of the specific confined space assessment and plan.

Any person who acts as an attendant, entrant or rescuer shall have a valid first aid and CPR certificate.

Records

A Entry Permit must be completed every time a confined space entry is occurring. In the following situations the original permit will need to be readdressed, updated or redone:

- * The foreperson or acting sub foreperson changes
- * The conditions in or of the confined space change
- * During the course of work a person becomes concerned about the safety of the workers or the general public because of factors not considered in the original permit

At any point in time that a new crew member is added to the confined space work, the permit shall be reviewed with the new member and the person who verified the permit.

All Entry Permits shall be submitted to and stored by the Supervisor or Health & Safety Coordinator at the Office upon completion of work. The permits shall be kept for 1 year or the 2 most recent records for each category of Confined Space whichever comes first.

Gas Monitoring

All gas monitoring in a Confined Space shall be done with a calibrated gas monitor.

Gas monitors shall be worn on the outside of the clothing at chest level. At any time that an alarm sounds the entrant shall leave the confined space immediately. In areas of high noise, alarm adapters or other solutions shall be used to ensure workers are able to hear the alarm.

Unless otherwise indicated, all gas monitors shall be set at 10% LEL, the allowable limit for cold work. If there is a chance you will be conducting hot work, it will be the responsibility of the supervisor to ensure that a competent person changes the settings on the gas monitor to 5% LEL (the allowable limits for hot work)

Entry into a Confined Space

Shall be done in accordance with the Plan and Permit for that particular Confined Space

Responsibilities

Supervisor/Leader

- Shall deem an employee competent to conduct a Confined Space Assessment or validate a Confined Space Permit
- Ensure proper training for entry & rescue teams
- Provide proper equipment for entry & rescue teams
- Ensure confined space assessments have been conducted
- Ensure confined space plans have been developed
- Ensure that applicable workers have reviewed this program, plan and the Entry permit
- Evaluate rescue Teams/Service to ensure they are adequately trained and prepared

Entry Attendants

At least one attendant is required outside the permit space into which entry is authorized for the duration of the entry procedure. Responsibilities include:

- To know and understand the hazards that may be faced during entry
- To be aware of possible behavioral effects of hazard exposure on entrants
- To track all entries and exits from the confined space
- To remain outside the permit space during entry operations until relieved by another attendant
- To communicate with entrants as necessary
- To monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space and order the entrants to immediately evacuate if the attendant has any concerns
- To summon rescue and other emergency services when required
- To perform non-entry rescues as specified by the rescue procedure

Entrant

- Shall wear a body harness at any time they enter a confined space
- Shall identify the attendant on the Entry Permit
- Shall follow program requirements
- Report any previously un-identified hazards associated with the confined space
- Participate in completion of the Entry Permit

Confined Space Rescuer

- Shall be appointed and trained to conduct the type of rescue required
- Shall ensure that all rescue equipment is available and inspected as required
- Shall be readily available to conduct a rescue when required
- Shall develop a space-specific rescue plan prior to any person entering a confined space and document the rescue procedure

Health & Safety Coordinator

- Shall ensure that the program is in compliance with the regulations
- Shall act as a resource for any confined space questions

****NOTE that all forms and a copy of the Confined Space Plan can be found in the Procedures section of this Policy****

11. FALL PROTECTION

Section 26 of the Construction Regulations addresses fall protection. In general, workers are required to be protected at minimum when:

- * They may fall more than 3 meters
- * They may fall more than 1.2 meters if the work area is used as a path for a wheelbarrow or similar
- * They may fall into operating machinery, water or another liquid
- * They may fall onto a hazardous substance or object
- * They may fall through an opening in a work surface

It is important to remember that the Construction Regulations represent the minimum standard. Len Corcoran Excavating will require that site supervisors evaluate hazards on their sites and provide adequate protection as required. If a worker could be seriously injured but the fall does not explicitly meet any of the above criteria fall protection must still be provided.

The 'gold standard' of fall protection is the guardrail and the requirements for guardrails are found in 26.3. As indicated in Section 26.1(1) the guardrail shall be the first choice to protect workers from falls. If a guardrail cannot be installed then the following methods may be used (with applicable sections listed)

- * A travel restraint system that meets the requirements of 26.4
- * A fall restricting system that meets the requirements of 26.5
- * A fall arrest system that meets the requirements of 26.6
- * A safety net that meets the requirements of 26.8

If a fall arrest system is to be used then the employer must develop a written procedure to rescue the worker after their fall has been arrested.

Regardless of the system used, the employer must ensure employees have received verbal and written instruction from a competent person in the use of that fall protection system. The employer must also ensure workers are able to recognize fall hazards by providing some basic fall protection training.

12. EMERGENCY PROCEDURES

Stay Calm	<ul style="list-style-type: none"> - it is important that everyone remain calm to allow emergency workers to do their jobs as efficiently as possible
<i>Assess the Situation</i>	<ul style="list-style-type: none"> - determine what happened and what the emergency is - identify the cause that needs to be controlled to eliminate immediate, ongoing or further damage
<i>Take Command</i>	<ul style="list-style-type: none"> - the most senior person on the site should take charge and call- or send another person to call- emergency services (911) and explain the situation - assign tasks for controlling the emergency (i.e. first aid) - it is important to maintain order and prevent panic
<i>Provide Protection</i>	<ul style="list-style-type: none"> - eliminate further losses and safeguard the area - control the energy source causing the emergency - protect victims, equipment, environment and accident scene from continuing damage or further hazards - divert traffic, put out fires, prevent objects from falling, shut down equipment or utilities and take other necessary measures - preserve the accident scene: only move what is necessary to preserve life or relieve human suffering and prevent immediate or further losses
<i>Aid & Manage</i>	<ul style="list-style-type: none"> - provide first aid or help those already doing so - organize the workforce for a headcount and to receive emergency assignments - direct all workers to a safe location as this makes it easier to identify who is missing, control panic and dispatch people for emergency duties - dispatch personnel to guide emergency vehicles upon arrival
<i>Maintain Contact</i>	<ul style="list-style-type: none"> - keep emergency services informed of the situation - contact utilities such as gas or hydro if applicable - contact the office (613-542-0820) and keep them informed
<i>Guide Emergency Services</i>	<ul style="list-style-type: none"> - meet emergency service workers onsite, lead them to the emergency scene and explain ongoing or potential hazards if known

13. FIRST AID AND CPR

- Only individuals with valid first aid certificates should administer first aid onsite
- There must be one first aid trained worker on every site and one first aider for every 5 workers onsite
- All Supervisors and Health and Safety Representatives must have first aid training
- The following table details those employees who have a valid first aid certificate:

Adam Metcalfe	Steve Clark	Ron Beach	Tom Rose
Dave MacLean	Roy Sheldon	Wally Stanton	John Hoogwerf
Terry Allen	Shawn Major	Josh Brown	Mitch Austin
Angus Walker	Tim Dunn	Andrew Murphy	Jeremy Menzies
Tyler Edgar	Tim Edgar	Llyod Anderson	Rob Rumbolt
Bob McCullum	Glen Martin	Steve Tennyson	Andrew Acton
Lucas Townsend	Pete Prue	Paul Gourdier	Matt Nieckar
Tim Howes	Kevin Mills	Stuart Johnson	Len Carr
Dave Gourley	Lane Guthrie	Jeff Clark	Jim Bush
Steve MacLean	Ed Parsons	Michelle Godfrey	Tyler Mederios

14. WORKPLACE INSPECTIONS AND HAZARD REPORTING

Workplace inspections of construction projects are vital in maintaining a safe workplace and identifying existing or potential hazards in order that appropriate corrective action can be taken. An assessment should be made by the Health and Safety Representative in conjunction with the supervisor and the Joint Health & Safety Committee. These inspections must be conducted on a monthly basis as a minimum and should follow the Company's Site Evaluation Checklist form included as an example in the back. Reports must be forwarded to the office.

Supervisors are required by the Construction regulations and Len Corcoran Excavating Policy to inspect their workplace weekly to ensure that machinery & equipment do not endanger any worker. Special attention should be paid to fire extinguishers, first aid kits, access & egress to worksites, sources of electricity (power tools, generators etc) and jobsite plans (traffic, emergency etc). Their findings and the record of the inspection should be noted in their day-timer and any problems should be reported to the office immediately.

The Employer shall ensure that these inspections are being completed and that inspectors are receiving the support they need to conduct thorough and timely reviews. The Employer will also ensure that issues are dealt with in a timely fashion and that solutions are discussed with onsite personnel &/or the JHSC to make sure solutions are practical for application in the field.

It is important to observe both conditions and procedures during the inspection. If a hazard poses an immediate threat, take immediate action to eliminate the hazard.

15. REPORTING AND INVESTIGATING ACCIDENTS

All accidents and injuries, no matter how minor, must be reported to the supervisor who will in turn inform the office. All accidents and injuries will then be investigated once the site has been secured and further risks have been eliminated.

Accidents and incidents vary in severity. The reporting requirements of accidents and incidents to the Ministry of Labor and the WSIB vary. Table 6 in the procedures section of this Policy describes these reporting requirements.

An investigation is required as soon as an accident has been attended to and the risk of further damage is eliminated. The investigation will be performed by Management with the assistance of the Health and Safety Representative or Joint Health & Safety Committee worker rep as stipulated in Section 15 of the Act.

The key steps in an investigation are as follows:

<i>Preparation</i>	<ul style="list-style-type: none"> - A complete investigation kit is available at the office and should be brought to the site by the Management representative - Each supervisor has a copy of this policy and several copies of Accident Investigation forms in their safety binder - Tables 1-7 are posted in the worksite and attached to this policy in the 'Procedures' section to enable quick reaction time and familiarity with the procedures of an accident investigation
<i>Emergency Response</i>	<ul style="list-style-type: none"> - Emergency response is covered in Sections 12 & 13 of the corporate Health and Safety policy - Table 1 (see Procedures Section) also lays out emergency procedures in an easy-to-follow manner
<i>Secure Scene</i>	<ul style="list-style-type: none"> - Once injured have been attended to and threat of further damage eliminated, the accident scene must be secured and witnesses identified - Investigation will proceed more smoothly if the accident scene is not altered; leave physical evidence undisturbed as much as possible - See Table 2 (Procedures Section) for more details
<i>Identify Witnesses</i>	<ul style="list-style-type: none"> - It is important to identify and interview anyone who saw the accident and/or was in the vicinity immediately before, during or after the accident including injured workers - Table 3 (Procedures Section) outlines steps for identifying witnesses

<p><i>Survey the Scene</i></p>	<ul style="list-style-type: none"> - This step is particularly important when the accident occurs outdoors and evidence such as slip, tire or impact marks can be wiped out by weather conditions - Survey the accident scene to collect and double-check evidence, confirm witnesses' statements, determine inconsistencies, establish cause of accident - Use measuring tape, camera and sketches to record the scene as found by the investigating team - Detailed and accurate documentation is important for consistency - All information recorded must be corroborated with witnesses and other facts- take lots of pictures - List and tag equipment and material involved before, during and after the accident, include items that might have been struck during the accident. Do not overlook any piece of evidence until the investigation is final - List any environmental conditions at the time of the accident - Survey the scene and try to picture how the accident may have occurred - Table 4 (in the Procedures Section) lists specific areas to investigate
<p><i>Gather Evidence</i></p>	<ul style="list-style-type: none"> - Evidence is of two kinds: physical objects and verbal testimony - The best time to gather evidence is when witnesses are being interviewed; they can then point to or reference objects as they walk the scene with the investigator
<p><i>Interview Witnesses</i></p>	<ul style="list-style-type: none"> - Interviews are best done when memories are fresh so conduct them as soon as possible after the accident - Interview witnesses to confirm and explain what has happened, corroborate other witnesses' accounts of the accident and obtain suggestions on how the accident could be prevented - It is important to pay attention to details on events before the accident as accidents usually occur as a result of these preceding events - During the interview the investigator should determine: <ul style="list-style-type: none"> ✓ Identity of people involved in the accident ✓ Identity of people with possible knowledge of the accident ✓ Events that occurred before, during and after the accident ✓ Timing and sequence of events ✓ Location and direction of actions and events ✓ Possible causes of each action and event ✓ Witness' suggestions for preventing similar incidents - Table 5 (in the Procedures Section) outlines how to conduct an interview

<p>Analyze Facts</p>	<ul style="list-style-type: none"> - Information should be sorted and analyzed to: identify what has been found, identify what might be missing, determine next course of action, eliminate unnecessary duplication - Accidents are often symptomatic of hidden deficiencies. Some problems are direct causes, others are indirect. All deficiencies should be accounted for when determining accident causes
<p>Prepare Report</p>	<ul style="list-style-type: none"> - Report is designed to help people learn from the accident. A copy will be kept in out case history binder at the office to be available for employees to look at and provide a reference for case studies at future safety meetings - Recommendations must be evaluated and implemented by those with authority - The report should include the following: <ul style="list-style-type: none"> ✓ Project Location ✓ Date & time of accident ✓ Name & address of injured ✓ Nature of injuries ✓ Attending physician ✓ Names & addresses of persons involved ✓ Names & addresses of constructor & employer ✓ Material damage including costs ✓ Names & addresses of witnesses ✓ Description of accident including equipment & machinery involved and type and circumstance of occurrence ✓ Immediate & underlying causes ✓ Recommendations for corrective action ✓ Signatures of those conducting the investigation and preparing the report - Four factors are essential for the report to be easy to understand and effective: <ul style="list-style-type: none"> ✓ Outline all events contributing to the accident in sequential order ✓ Point out deficiencies or breakdowns in the system as they occurred ✓ Summarize deficiencies ✓ List all recommendations to deficiencies
<p>Follow Up</p>	<ul style="list-style-type: none"> - Circulate results of the investigation to all company sites so others can learn - Make changes in company operations and raise key issues with trade associations, other contractors, unions and other groups as necessary

16. INVESTIGATING 'NEAR MISSES'

LCE has decided that we will investigate all "near misses" that occur on our jobsites in hopes of gathering valuable information that will help us avoid a serious incident in the future. A "near miss" is any situation that could have potentially been serious or caused an injury but by pure luck or good-fortune does not. An example would be a worker who gets into the operator's swing radius, the operator does not see him, swings in his direction and the bucket misses hitting the worker by inches. This "near miss" should be documented and discussed so that both involved parties can be educated to make sure such an incident does not happen again. Again, we want to stress that the purpose of this exercise is not to find fault or point fingers but rather to acknowledge and record close calls so we can learn from them and prevent more serious accidents in the future.

In these situations the Onsite Supervisor will use the form provided in his Safety Binder to describe and document the 'near-miss'. The Onsite Health & Safety Representative will also review and sign-off that the summary of the events are as he witnessed (if applicable) and that all the required information has been provided. If the Health & Safety rep was not a witness, another witness will initial the report to confirm the sequence of events.

All 'Near Miss' reports will include the following:

- ◆ Project location
- ◆ Date and time of near-miss
- ◆ Names of persons involved
- ◆ Names of constructor and employer(s)
- ◆ Material damage (if any) including costs
- ◆ Names (and addresses if not employees of LCE) of witnesses
- ◆ Description of 'near miss' including equipment and machinery involved and type and circumstances of occurrence
- ◆ Immediate and underlying causes
- ◆ Recommendations for corrective action
- ◆ Signatures of the Onsite Supervisor and the Onsite Health & Safety Representative
- ◆ If the Site Safety rep was not a witness please have a witness initial the description to confirm validity

The Form to complete a "Near Miss" evaluation can be found in the Procedures Section of this Policy

17. RETURN TO WORK POLICY STATEMENT

A workplace injury can be devastating to any worker and their family. Our focus is the prevention of all workplace accidents and injuries. However, in the event of an occupational injury we have adopted the philosophy of returning an injured worker to meaningful and productive work, where possible, in order to protect their earning ability and minimize the disruption to their personal lives. We have developed a *Return to Work Program* that is committed to providing suitable work consistent with the functional capabilities of an injured worker. In almost every case we will be able to immediately accommodate the worker with modified duties within their physical capabilities. The goal of the program is to return the worker to their pre-injury position through good communication with all parties involved and through fair and consistent treatment in the provision of modified duties.

The worker is responsible for having the Functional Abilities Form for Timely Return to Work (available from the Onsite Supervisor at the time of the accident or from the Office at any time) completed and returned to the company within 24 hours so that the workplace parties can jointly develop an early and safe return to work plan.

The co-operation and positive attitude needed to maintain the effectiveness of this program is essential by everyone. The program also requires respect for the returning injured worker by all employees and management. We therefore ask that everyone does their part to keep our valuable team together and keep us all working.

PRESIDENT

18. ROLES & RESPONSIBILITIES OF THE WORKPLACE PARTIES (WPP)

Both the Worker and the Employer have a responsibility to participate in an Early and Safe Return to Work (ESRTW) Plan

The Worker Shall:

- 1) Contact the accident employer during the recovery period. Contact must occur regularly to determine when a worker is fit to return to work
- 2) Assist in the collection of job description(s), task analysis, etc.
- 3) Provide such medical information as the employer requires to facilitate an early and safe return to work
- 4) Participate in the ESRTW Plan and immediately report any task difficulties
- 5) Ensure that ongoing treatment does not interfere with the ESRTW Plan
- 6) Work within the established company rules, procedures and the ESRTW Plan

The Supervisor Shall:

- 1) Promote and participate in the objectives of the program and discuss with the employee(s)
- 2) Provide ESRTWs for workers as required
- 3) Assist in the collection of medical information, job description(s) for job task analysis and the development and implementation of workplace modifications

Management Shall:

- 1) Promote and implement an ESRTW Plan and ensure the policy is up-dated as required
- 2) Discuss the plan with the worker(s) and supervisor(s) and ensure that the objective of the ESRTW Plan is understood
- 3) Determine the frequency of conducting evaluations of the ESRTW and the worker's progress in the plan
- 4) Ensure the worker signs all formal ESRTW plan(s)
- 5) Monitor the progress of the worker participating in an ESRTW plan and maintain records of the worker's progress and up-to-date restrictions.

19. RETURN TO WORK POLICY

Section 41 of the Workplace Safety and Insurance Act legislates that employers have a duty to re-employ the injured worker. Effective September 2008, construction companies are now bound by Section 41 and have a duty to re-employ. However as stated in the Return to Work Policy Statement, LCE has always believed that an early and safe return to work (ESRTW) program is in both the employee and LCE's best interests so we will continue and try to return the injured individual to work as soon as possible under an ESRTW or modified duties program.

It is the policy of LCE to accommodate a worker that is temporarily disabled **as a result of an accident that arose in and out of the course of employment**. Our objective is to return and rehabilitate the worker to his/her maximum level of ability enabling them to be capable of effectively and efficiently performing the assigned job/ tasks.

The employer is responsible for keeping the Workplace Safety and Insurance Board (WSIB) informed of the availability of modified work and of the worker's progress during the return to work and the rehabilitation process.

The worker is responsible for fully co-operating with the return to work process and for ensuring that the employer is provided with such medical information and/or functional abilities information that will assist in a successful and safe return to work through participation in a modified duties program.

Some examples of modified duties include:

- ◆ Housekeeping or inventory control
- ◆ Traffic control or security
- ◆ Assistant to foreman or grade man
- ◆ Performing regular duties with a helper
- ◆ Alterations to rest periods or exercise breaks
- ◆ Altered or reduced hours

It should be noted that modified duties in no way affect an individual's right to compensation benefits or future benefits should they ever be required. **However**, if modified work is offered and a WSIB appointed physician deems the worker physically able to participate and the worker declines the modified work offer then the worker's claim will almost certainly be denied.

The possibility of modified duties must be discussed with the physician, the injured worker and the company's representative at the time of the hospital visit. Included in this Return to Work program is a letter to the attending health care practitioner that, along with the WSIB's Functional Abilities Form for Timely Return to Work, will be made available to the injured worker prior to the hospital visit. This form should be returned to the office within 24 hours of the accident to ensure all parties can be involved in developing an ESRTW program.

20. JOINT HEALTH & SAFETY COMMITTEE

In accordance with section 9(2a) of the Act Len Corcoran Excavating will create a Joint Health and Safety Committee (JHSC) comprised of two members. Our JHSC will be comprised of the Site Health & Safety Representatives for each of our worksites plus management representatives. LCE will ensure that the ratio of management to worker representation on the JHSC is never more than 1:1. The workforce will choose their site's Health & Safety representative in an unbiased election as described in the next section. Since this JHSC will represent LCE corporately, at least one worker and one management delegate must be certified members. LCE will ensure that at least one worker and one management representative have their Part 1 Certification Training for JHSC as required by the Act & Regulations. Part 2 (Hazard Training) will be administered as required (requirement for training to be reviewed annually by the Health & Safety Coordinator).

The function and powers of the JHSC are outlined in sections 8 & 9 of the OHSA. In general, the JHSC has the power to shut a job-site down due to unsafe working conditions, make recommendations to the owner about safety concerns, the responsibility to **conduct monthly inspections** and identify potential hazards and dangers in the workplace. The JHSC must **meet at least once every three months** and members shall be paid for time they spend on the committee. The minutes of the JHSC meetings will be recorded and kept on file at LCE.

21. HEALTH & SAFETY REPRESENTATIVE

The Act states that at projects where the number of workers regularly exceeds 5 but is no more than 20 a Health and Safety Representative must be selected by those workers who do not exercise managerial function in an unbiased election. Each of our construction crews falls under this umbrella and as such each crew will have a qualified Health and Safety Representative. The individual selected by the Crew as their representative will receive training for a Health & Safety Representative within one month of election. Elections should be conducted in Oct-Dec for the following year so training can be conducted in the off-season. Elected individuals will receive training but must also familiarize themselves with the Corporate Safety Policy of Len Corcoran Excavating Limited and also possess a good working knowledge of the latest edition of the Occupational Health and Safety Act and Regulations for Construction Projects. If they have any questions they are to contact the Health & Safety Coordinator.

The Health and Safety Representative shall inspect the workplace at least once per month. The results of these inspections as well as any recommendations must be submitted to the owner to ensure there is adequate communication between both parties and to keep the required 'paper trail' up-to-date. Representatives shall use the same checklist as the Supervisors to conduct their inspections and shall record any observations in their logbook. LCE will provide each Health & Safety Representative a day-timer/logbook in which they will record inspections, accidents, tailboard talks issues/complaints from fellow employees and note when issues were resolved by the Employer. It is important that this logbook be kept up-to-date and accurate as its contents would help form the basis for a defense in the event of a serious accident or investigation.

22. HEALTH & SAFETY COORDINATOR

The Health & Safety Coordinator shall be responsible for maintaining up-to-date records at the Office regarding training for all employees, inspections, confined space entry and any injuries. They will be the communication arm for the Employer for all issues related to Health & Safety and will liaise between the WSIB, JHSC, Onsite Supervisors, Site Health & Safety Reps and the Employer. The Health & Safety Coordinator will ensure that the Corporate Safety Policy is current and enforceable and that any rule changes are reflected in the policy. They will conduct, on minimum, an annual review of the Safety Policy and ensure that such a review is conducted with the workforce and supervisors as well. They will also be the person workers, Supervisors, Health & Safety Reps or the JHSC contact when they have a question related to the Corporate Safety Policy, Occupational Health & Safety Act or Construction Reg. and if the Coordinator does not know the answer they will have access to people who do. The Coordinator shall participate on behalf of the Company in Safety Groups and/or other community or industry-specific safety initiatives to improve the culture of Safety at LCE.

23. TRAFFIC SAFETY

Sections 67 through 69 of the Construction regulations address traffic safety with the focus on non- construction traffic. In general, if a worker can be endangered by vehicular traffic unrelated to the project then the Employer must take steps to protect the worker from this hazard. There are many protections that might be used including flashing lights, barricades, delineators, warning signs crash trucks etc. If it is not feasible to close the project to non- construction traffic and the posted speed limit is less than 90km/h then a worker may be used to direct traffic through the site. The traffic control workers must be competent persons, not be asked to perform any other work while directing traffic, be positioned in such a way that they are endangered as little as possible by vehicular traffic, be equipped with a sign that meets the requirements in Section 68 of the Construction Regulations and be given adequate explanation and instructions by the site supervisor. Traffic Control Persons are **NEVER** allowed to flag or direct traffic in contravention to traffic lights at an intersection. If it is necessary to flag traffic in an intersection controlled by traffic lights the supervisor should arrange to have the lights decommissioned for the duration of the work.

These workers must wear approved safety vests (described in Section 69 of the Construction Regulations) in addition to the regular PPE required on Len Corcoran Excavating jobsites (see Section 4 of this policy for details). Traffic Control workers must be relieved of their post at regular intervals so they can use the washroom, eat and re-hydrate. It is important that all other crew members recognize that the Construction Regulations strictly requires traffic control measures where non-construction vehicular traffic poses a threat and so without these persons, we cannot work on such sites.

Supervisors are required by Section 67 of the Construction Regulations to design a traffic protection plan for each jobsite. This plan should identify the possible sources of non-construction vehicular traffic hazards and describe the protections being used to limit the potential for incident. A copy of the plan shall be kept on site where it can be made available to an inspector or worker on request. The Employer will provide each supervisor with a Book 7 (Highway Traffic Act) which provides detailed descriptions of how to set up traffic control plans and should form the basis of all traffic control planning.

The other aspect of traffic safety concerns construction traffic. This part is multi-faceted with the need to protect both our own workforce and the public from these hazards. Dump-trucks and heavy equipment are equipped with back-up alarms; it is against the law to disable these alarms and any hired trucks found to have non-functional back-up alarms must be reported to the Supervisor and sent off-site. Equipment or trucks are not permitted to reverse on any LCE site unless they are under the direction of a signal-person. Truck drivers have been instructed to pull onto site and wait until someone arrives to direct them. Any truck reversing without a signal-person must be reported to the Supervisor; drivers will receive one warning before they are removed from the site. Individuals responsible for traffic control need to remember that the general public has very little appreciation for the speed and movement of construction equipment; they WILL sit in blind spots and try to fit into places they shouldn't out of ignorance. It is our responsibility to protect them from themselves while they are on our sites so please remain vigilant and stop people cutting through areas travelled by construction equipment and give our operators plenty of room to maneuver.

24. HEAT STRESS

Heat stress occurs when the body's core temperature begins to rise above the normal range of 36-38 degrees Celsius. When the body is unable to adequately cool, a series of heat-related illnesses including heat stroke & heat exhaustion may occur.

How to recognize heat stress disorders:

- * **Heat Exhaustion** occurs when the body cannot adequate blood flowing to vital organs and send blood to the skin to reduce body temperature. Symptoms of heat exhaustion include:
 - Weakness
 - Difficulty continuing work
 - Headache
 - Breathlessness
 - Nausea or vomiting
 - Feeling faint or actual fainting
- * Workers suffering from **heat exhaustion** should do the following:
 - Rest in a cool place
 - Drink cool water
 - Remove unnecessary clothing
 - Loosen clothing
 - Shower or sponge with cool water
- * REMEMBER it takes **30 MINUTES** for the body to cool down once a worker is suffering from heat exhaustion. Without treatment heat exhaustion can lead to heat stroke
- * Heat Stroke occurs when the body can no longer cool itself and core temperatures rise to critical levels. Symptoms include:
 - Confusion
 - Irrational behavior
 - Loss of consciousness
 - Convulsions
 - Lack of sweating
 - Hot, dry skin
 - Abnormally high body temperature i.e. 41 C
- * HEAT STROKE REQUIRES IMMEDIATE MEDICAL ATTENTION
 - Call 911
 - Provide immediate, aggressive cooling
 - Immerse casualty in a tub of cool water, place in cool shower or spray with cool water from a hose
 - Transport casualty to hospital
 - Do not give anything by mouth to an unconscious person

There are many factors that influence an individual's susceptibility to heat stress including: age, weight, physical fitness, previous heat illness, heart disease or high blood pressure, recent illness, alcohol consumption, medication, lack of acclimatization

Steps management can take to control heat stress include:

- * Give workers frequent breaks in a cool area away from heat--around 25°C is ideal
- * Provide unlimited amounts of cool (not cold) drinking water conveniently located

- * Allow workers time to get acclimatized (gradual increase from 50% to 100% over 4 days for workers with experience working in heat)
- * Make allowances for workers who must wear personal protective clothing and equipment that retains heat and restricts the evaporation of sweat
- * Schedule hot jobs for the cooler part of the day
- * Consider the use of cooling vests containing ice packs or ice water to help rid bodies of excess heat

Steps workers can take to control heat stress include:

- * Wear light, loose clothing that permits the evaporation of sweat
- * Drink small amounts of water--8 ounces (250 ml)--every half hour or so. Don't wait until you're thirsty
- * Avoid beverages such as tea, coffee, or beer that make you urinate more frequently.
- * Avoid eating hot, heavy meals. They tend to increase internal body temperature by redirecting blood flow away from the skin to the digestive system
- * Don't take salt tablets unless a physician prescribes them. Natural body salts lost through sweating are easily replaced by a normal diet
- * Tell co-workers & supervisor if they experience any heat exhaustion symptoms and watch co-workers for unusual behavior that may indicate heat stress

25. MUSCULOSKELETAL DISORDERS (MSDs)

MSDs are injuries of the muscles, tendons, ligaments, joints, cartilage, or spinal discs. They can be from an instantaneous event but are more commonly develop gradually. Some examples you may be familiar with are carpal tunnel disorder and tendinitis.

MSDs occur when the following risk factors occur at high levels or in combination:

- * **Forceful Exertion:** force is the amount of effort necessary to perform the job; the more force required the greater the stress on the body and the greater the risk of injury
- * **Repetitive Movements:** movements performed over and over place stress on the body without sufficient time for muscle recovery
- * **Awkward Postures:** are those where the joints are held or moved away from the body's natural range of motion

Secondary risk factors include vibration and temperature. The risk of injury is significantly increased when there is combination of risk factors; one factor alone is unlikely to cause an injury.

The following table details the two types of controls that can be implemented to reduce the risk of MSDs. Supervisors must consider the potential for MSDs when they assign a job and take appropriate action to mitigate the risk. If workers are finding themselves tired or taxed beyond their abilities they need to speak to their Supervisor, Health and Safety Representative or the Safety Coordinator; having an exhausted or overmatched worker continue at a job significantly increases the risk of an injury.

Engineering Controls	Administrative Controls
Measures taken to modify the forcefulness, repetitiveness, vibration, awkwardness, physical pressures or environmental extremes associated with a job. Examples include: <ul style="list-style-type: none">• Selection and use of tools• Work materials• Work methods	Management-directed work policies and procedures <ul style="list-style-type: none">• Changes in job rules and procedures (i.e. more rest breaks)• Rotate workers through jobs that are physically difficult or tiring• Train workers to recognize ergonomic risk factors and learn techniques to reduce stress and strain in their job

26. OTHER CORPORATE POLICY DIRECTIVES

- * We have asked all of our suppliers to ensure that all delivery slips have the signature of a LCE employee on the copy they send to us. Further, we ask that in these days of carbon-less slips that employees take care to sign BOTH copies of any packing slips
- * Employees who sign for materials are the person we will contact if the order is incomplete or there are other questions. Please make sure if you sign for something you have counted and verified that you are signing for the same as was actually received. If you are unsure, get someone more informed to sign.
- * Timecards: there will be only one weeks grace for delinquent timecards. After this period your cheque will not be deposited or released until the cards are submitted.
- * Cell Phones: Private cell phone use on jobsites and in company vehicles and equipment is increasing to the point, in some cases, to where it interferes with the worker's ability to safely and effectively do their job. There are liability issues as well as using a cell phone is certainly distracting and could lead to an incident. If management or a supervisor observes/decides that your cell phone is interfering with your work, you will be asked to refrain from using it on company time. Please be respectful of the company and your co-workers in this regard.
- * Equipment Damage: If you are operating equipment or driving vehicles owned or leased by LCE and damage occurs that is obviously due to operator or driver error you are asked to safely park the equipment, tell the supervisor what happened, agree the damage was in fact operator error, and leave the site for the balance of the day. Please call Dan Corcoran (613-542-0820) to arrange for a meeting the following morning to discuss the situation. If it is a licensed vehicle, please call the office to discuss the next step.
- * Personal Music Devices: the use of ipods or other personal music devices is strictly forbidden during working hours on all jobsites. Employees are permitted to listen to these devices during breaks or lunch. Violators will be disciplined under the enforcement policy

27. Accessibility for Ontarians with Disabilities Act (AODA)

Len Corcoran Excavating Ltd. (LCE) is committed to excellence in serving all customers including those with disabilities.

We will ensure that our staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods and services. We will communicate with people with disabilities in ways that take into account their disability. We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public. Persons with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

In the event that our office at 2212 Sydenham Rd. Elginburg, Ontario has a planned or unexpected disruption to services or facility for customers with disabilities, LCE will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternate services, if available. This notice will be placed on the front accessible entrance of the office.

LCE will provide training to employees who deal with the public. Customer service representatives in the office, Managers and Supervisors will be trained and familiar with AODA and how to best serve those with disabilities. This training will be conducted and refreshed annually along with our corporate health and safety policy. This training will consist of an overview of the Accessibility for Ontarians with Disabilities Act (AODA). How it is related to the various levels of customer service and how applies to LCE. How to interact and communicate with people with various types of disabilities. How to interact with people with disabilities who use assistive devices or require the assistance of a service animal or support person, and what to do if a person with a disability is having difficulty accessing LCE's services. Staff will also be trained when changes are made to this plan.

Customers that wish to provide feedback can do so by contacting LCE office at 2212 Sydenham rd. in Elginburg Ontario or phone 613-542-0820. All feedback will be handled by the Customer Service Representatives. Customers can expect to hear back within 5 business days.