



OCCUPATIONAL HEALTH AND  
SAFETY  
MANAGEMENT SYSTEM  
OH&S MANUAL

***McCabe, Hamilton, and Renny Co., Ltd.***

*Honolulu, Hawaii*

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## Introduction

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McCabe, Hamilton, and Renny has developed and implemented an Occupational Health and Safety Management System in order to support and promote good health and safety practices. The Occupational Health and Safety Management System meets the requirements of the international standard OHSAS 18001:2007.

This manual is an effort by the Company to manage a workplace safety and health program using a systemic approach. The structure of this manual closely follows that of a typical management system based on the Plan-Do-Check-Act (PDCA) continual improvement cycle.

This manual delineates authorities; inter relationships and responsibilities of the personnel responsible for performing within the system. The manual also provides procedures, instructions, and references for the activities comprising the health and safety management system to ensure compliance to the necessary requirements of the standard.

The manual is used internally to guide the company's employees through the various requirements of the standard that must be met and maintained in order to ensure Occupational Health and Safety stewardship, customer satisfaction, continual improvement and provide the necessary instructions that create an empowered work force.

This manual is used externally to introduce our health and safety management system to our customers and other external organizations or individuals. The manual is used to familiarize them with the controls that have been implemented and to assure them that the integrity of the health and safety management system is maintained and focused on Occupational Health and Safety stewardship, customer satisfaction and continuous improvement.

President: \_\_\_\_\_ Date: \_\_\_\_\_

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## **1.0 LEADERSHIP, RESPONSIBILITIES, AND COMPLIANCE**

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### **1.1 HEALTH AND SAFETY POLICY STATEMENT**

Everyone employed by McCabe, Hamilton and Renny has a personal responsibility to become involved in solving health and safety problems. The Company's goal is to have all employees working together to identify and control situations that could cause harm and to integrate health and safety practices into their daily activities. Worker participation is crucial to effective health and safety.

The Company shall:

- Recognizes that each employee has a right to a work environment which will not adversely affect his or her health and safety
- Be committed to providing safe workplaces for all its employees
- Diligently carry out the employer duties contained in OSHA's directives.
- Minimize the risk of occupational injury, illness, and property damage through:
  - Implementing a comprehensive health and safety program;
  - Ensuring the Safety Manager, Safety Committees, and supervisors identify and control workplace hazards and communicate information about those hazards throughout the workplace;
  - Provide training, support, and work cooperatively with the Company Safety Manager and Safety Committees.
- Require supervisors to be informed of all the known or foreseeable hazards in the areas where they work.
- Ensure workers are familiar with these hazards and the acceptable ways to control them.

### **1.2 RESPONSIBILITY AND ACCOUNTABILITY**

The goal of the internal responsibility system is to have all employees working together to identify and control hazards that could cause harm. The word 'internal' in the internal responsibility system refers to both internal to each workplace as well as internal to each individual employee at that workplace.

**The Internal Responsibility System shall:**

- Place responsibility for controlling hazards on those in the workplace, making everyone a contributor to workplace safety.
- Encourage management and workers to take joint action to identify and control hazards.
- Promote cooperation and motivate everyone to protect their health and safety and that of their fellow workers

As an individual, everyone is responsible and accountable for health and safety and must "... take every precaution reasonable to avoid a work related injury or illness." While an individual with formal authority in a workplace may delegate responsibility and authority to others to perform certain work, he or she cannot delegate their accountability to ensure the work is carried out safely.

**Management is responsible for:**

- Providing a safe and healthy workplace including properly maintained equipment, systems, and tools;

- Providing information, training, instruction, and supervision to protect the health and safety of workers;
- Establishing, supporting, and consulting with the Company's Safety Manager and Safety Committees on all matters to improve workplace health and safety including regular safety inspections of the workplace.

**Supervisors are responsible for:**

- Knowing and complying with health and safety requirements;
- Ensuring workers under their direction know and comply with health and safety requirements;
- Ensuring workers under their direction receive adequate supervision.

**Workers are responsible for:**

- Cooperating with management, supervisors, and the Company's Safety Manager;
- Following safe work practices and procedures and using safeguards and personal protective equipment;
- Reporting hazards (such as unsafe situations and activities) to their supervisor immediately.

**Safety Manager and Safety Committees are responsible for:**

- Identify conditions of the workplace that may be unhealthy or unsafe;
- Receiving complaints from workers as to their concerns about health and safety in the workplace;
- Making recommendations to management to protect the health, safety, and welfare of workers at the workplace.

**1.3 PROGRESSIVE DISCIPLINE PROCESS**

The Company makes all reasonable efforts to conduct its operations in compliance with OSHA standards. Willful non-compliance with these standards by managers, supervisors, or workers shall be regarded as a serious breach of expected performance and shall be cause for progressive discipline.

Disciplinary action resulting from a violation of OSHA requirements shall be progressive and shall be appropriate to the nature of the violation, the seriousness of the offence, previous violations, and any mitigating circumstances:

**Verbal Warning**

The first occurrence of a 'less serious offence' shall be dealt with in an informal manner. A less serious offence is one that poses minimal risk of injury to the employee, fellow employees or other people in or near the workplace, or where there is minimal risk of damage to property and equipment. The employee shall be advised of the proper procedure. Where lack of training or supervision is identified as a contributing factor, arrangements shall be made to fill this need. No written record of the verbal warning is put on the employee's official employment file, but the supervisor may make a note in their daily log. If the employee is covered by a collective agreement, the provisions of the agreement will apply.

## Written Warning

A second occurrence of the same or related offence or the first occurrence of a more serious offence shall be dealt with in a formal manner by a written warning. The supervisor responsible for the employee shall arrange a meeting with the employee to ensure the employee understands the nature of the violation and the importance of compliance. If the employee is covered by a collective agreement, the provisions of the collective agreement will apply. A copy of the warning shall be forwarded to the Human Resources Division to be placed on the employee's official employment file Disciplinary Action.

Subsequent occurrences may result in the employee being suspended without pay for a period to be determined up to and including termination. If the employee is covered by a collective agreement, the provisions of the collective agreement will apply.

## 1.4 COMPLAINT RESOLUTION

Workers shall initially report their Safety and/or Health concerns to their supervisors and if the "Internal Responsibility System" is functioning, the concern or complaint will usually be resolved between the workers and supervisor. However, when the worker and supervisor cannot agree that the matter is satisfactorily resolved, the worker shall report the matter to MHR's SAFETY MANAGER. MHR's SAFETY MANAGER must decide if the matter is urgent and if so, call an emergency meeting of the committee and initiate an investigation to find out what corrective action should be recommended and/or taken. If the matter is not urgent, it should be discussed at the next regular meeting with a view to resolving the issue. The "MHR HAZARD REPORT FORM" (Attachment A) and "EMPLOYEE SAFETY SUGGESTION FORM" (Attachment B) are available for workers and supervisors to document their concerns and recommendations.

All workers, at all times have a right to report unresolved safety hazards to the Occupational Safety & Health Administration. However, each worker has a duty to act in accordance with the internal responsibility system. This implies that a worker will make every effort reasonable under the circumstances to resolve the matter utilizing the resources within the workplace and department before reporting it to the Occupational Safety & Health Administration.

## 1.5 OSHA INSPECTIONS

**Reasons for Inspection** – An OSHA inspector may visit a site or facility at any time and without notice. McCabe employees shall be familiar, and comply, with OSHA rules and regulations. An OSHA inspection is likely when any of the following occur:

**Imminent danger situations** – Hazards that could cause death or serious physical harm receive top priority. Compliance officers will ask employers to correct these hazards immediately or remove endangered employees.

**Fatalities and catastrophes** – OSHA is required to investigate incidents that involve a death or the hospitalization of 3 or more employees and employers must report such catastrophes to OSHA within 8 hours.

**Complaints** – Allegations of hazards or violations receive a high priority. Employees may request anonymity when they file complaints.



**Referrals** – Hazard information received from other federal, state or local agencies, individuals, organizations or the media receive consideration for inspection.

**Follow-ups** – Checks for abatement of violations cited during previous inspections are conducted by the agency in certain circumstances.

**Planned or programmed investigations** – OSHA conducts inspections aimed at specific high-hazard industries or individual workplaces that have experienced high rates of injuries and illnesses.

**Designated Representatives** – The designated representatives and alternates shall have a basic understanding of OSHA regulations applicable to the operations being conducted. The following personnel are designated as McCabe’s representatives: Honolulu – Primary Jimmy Zane, Honolulu Terminals Alternate - Camy ChinMeun, Shop Alternate – Andrew Souza, Maui & Kauai - Primary Jimmy Zane, Alternate – Kim Guard.

**OSHA Inspector’s Arrival** – The receptionist, security guard, or on-site supervisor shall have the OSHA inspector wait until the designated person or alternate is located. Additionally the ship’s agent will be notified that OSHA will be conducting an inspection.

*Note: Once either the Primary or Alternate representative has made contact with the OSHA inspector he/she shall continually accompany the inspector while on the premises.*

**Request Identification** – Ask the OSHA inspector for credentials (copy of photo ID and serial number) and record his/her name.

**Opening Conference** – Take the inspector into a private office or conference room and ask the following questions:

- What is the reason for the inspection?
- If the reason is an employee complaint, ask for a copy of the complaint.
- What specific areas will be inspected?

**Walk- Around** – The representative or alternate shall bring a camera, pen, and notepad and adhere to the following protocol during the physical inspection of the facility or operation:

- Accompany the inspector at all times unless he asks to interview a non-management employee in private, which is permissible. Management can request to be present if a manager or supervisor is interviewed.
- Do not agree to a tape recorded interview.
- It is the employee’s decision as to whether to sign a statement.
- Take notes of what the inspector looks at, his questions, and his comments.
- Take a photo of whatever the inspector photographs.
- Answer the inspector’s questions briefly and factually.
- Do not volunteer information.
- If you do not know the answer to a question, tell the inspector that you will get back to him/her with the information. Do not guess.
- Do not demonstrate equipment or re-create an accident.
- If the inspector wants to do air or noise sampling, arrange a mutually convenient time when you can have an industrial hygienist present to do side-by-side testing.
- If requested, show the inspector documents such as procedures from our safety manual, company web, and OSHA 300 logs. Keep a list of requested documents.

**Closing Conference** – Take the inspector into a private office or conference room and ask the following questions:

- What are your findings?
- Did you find any violations? If you do not understand the violation, ask for an explanation. If you corrected the violation on the spot, point that out to the inspector.
- Will any citations be issued?
- How will any penalty be computed?
- What would constitute abatement of the alleged violation?
- Do not argue with the inspector.

**Citation** – If you receive a citation in the mail, report it to the President and Safety Manager immediately who will in turn post the citation in the workplace.

**Prompt Notification** – Prompt notification is crucial because only 15 working days are allowed to file a notice of contest. We will request an informal conference as the initial step in the appeal process.

## **1.6 OCCUPATIONAL INJURY AND ILLNESS RECORDING AND REPORTING REQUIREMENTS**

Pursuant to Occupational Injury and Illness Recording and Reporting Requirements 29 CFR 1904.39(a) requires employers to report all work-related fatalities and all work-related in-patient hospitalizations that require care or treatment, all amputations, and all losses of an eye to OSHA within 24 hours.

OSHA's regulation at 29 CFR part 1904 requires records to kept of occupational injuries and illnesses on an OSHA Form 300, which is the "Log of Work-Related Injuries and Illnesses", or equivalent. Additionally a supplementary OSHA Form 301 "Injury and Illness Incident Report" or equivalent that provides additional details about each case recorded on the 300 Log. At the end of each year a summary report of all injuries and illnesses OSHA Form 300A, "Summary of Work-Related Injuries and Illnesses", must be prepared and posted.

## **2.0 MHR's SAFETY MANAGER AND SAFETY COMMITTEES**

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### **2.1 POLICY**

McCabe, Hamilton, and Renny recognize the valuable contribution made by the Company's Safety Manager and the Safety Committees toward maintaining safe and healthy workplaces. Both play an integral part in the Company's inspection program, hazard identification and control program, development of safe work practices and procedures, as well as identifying training and education needs and promoting safety awareness programs. Members of Safety Committee because of their direct involvement with the day-to-day operations are in a good position to recognize essential problems and make practical recommendations. The Company shall actively seeks their advice on the best ways to prevent workplace accidents.

As a demonstration of its commitment to working with both the Safety Manager and Safety Committees, the company shall provide support in the following ways:

- Clerical support and supplies;
- Meeting room;
- Documentation and information resources; and copies of all relevant documents pertaining to health and safety, which may include documents such as accident investigation reports, health and safety audit reports, reports of hygiene testing, and the reports of special health and safety related consultants.
- Provide committee/representative training to meet or exceed OSHA Standards.
- All the equipment, materials, and supplies necessary to conduct periodic safety inspections.

The Safety Committee will provide support in the following ways:

- Post on the company's web page a copy of the minutes and written recommendations from committee meetings along with the Executive Safety Steering Committee written response to all committee recommendations for all employees to review.
- The committee will hold special meetings as required to formulate recommendations pertaining to work refusals where the matter was not settled to the ILWU's satisfaction.
- One committee members will accompany the Company's Safety Manager during routine inspections.

### **2.2 ESTABLISHMENT OF MHR'S SAFETY COMMITTEE & EXECUTIVE SAFETY STEERING COMMITTEE**

Employees shall be encouraged to participate in all aspects of the safety and health program, from developing and planning to implementing and evaluating. A fundamental aspect of employee participation is encouraging employees to report work-related injuries, illnesses, and hazards and to recommend appropriate ways to address them.

MHR has formed an Executive Safety Steering Committee and a Safety Committee to help employees and management work together to identify safety problems, develop solutions, review incident reports, and evaluate the effectiveness of our safety program.

**The Safety Committee** will be made of a representative from each department and if possible union representation. The Safety Manager will schedule and chair the committee meetings on a monthly basis.

The duties and responsibilities of the Safety Committee are listed in detail under section 2.7.

**The Executive Safety Steering Committee** includes the President, Department Directors, Safety Manager, and Training Director. The Safety Manager shall schedule and chair the committee meetings on a quarterly basis.

- Duties and responsibilities:
  - establish compliance assessment priorities;
  - review and address Safety Committee recommendations; and
  - resolve any resource issues or areas of concern in maintaining compliance and preventing accidents.

## **2.3 COMMITTEE TRAINING**

Committee members will be empowered with the knowledge and skills needed to carry out their duties and activities.

The training course content is outlined below:

- Introduction to Occupation Health and Safety
- Definition of key terms
- Building a safety culture
- Safety policies and programs
- Fundamentals and benefits of accident prevention
- OSHA Regulations
- The purpose and duties of committee members
- Procedural rules for effective meetings
- The process of making, communicating and following up on recommendations records and minute keeping
- Hazard, Recognition, Evaluation and Control
- Types of, and contributing factors to hazards
- Methods of recognizing, evaluating and controlling hazards
- Accidents/incident investigation outcomes
- Workplace Inspections
- The need for inspections, planning, conducting and reporting of inspections and monitoring corrective actions

## **2.4 SAFETY COMMITTEE'S DUTIES AND RESPONSIBILITIES**

The main task of the Safety Committee is to monitor the internal responsibility system. By meeting regularly, and discussing and resolving concerns, the committee can demonstrate that health and safety is taken seriously. The following is a list of suggestions which may be helpful to ensure the committee is effective in performing its duties:

**Work together as a team.**

- A group of individuals working together as a team to achieve agreed upon goals are more effective than any individual member working alone.
- Do not deal with issues that are not health and safety matters.
- Each member must feel free to express their views without risk of retaliation.

**Establish roles and responsibilities for each member.**

- Each member must be clear about knowing their roles and what to do.
- Establish procedures for assigning responsibilities, making decisions, communicating and coordinating efforts, monitoring progress and evaluating results.

**Agree on ways of handling disagreements. From time to time members may disagree, for example, on how a hazard should be handled. Methods to resolve disagreements include:**

- Using consensus to make decisions
- Asking a neutral third party to mediate
- Negotiating mutually acceptable compromises using project teams to recommend options to solve difficult technical problems

**Agree upon goals.**

- Effective committees have a clear idea of what they want to accomplish over the short and long term.
- The chairperson should provide leadership and help set the tone for the committee.
- Each member should have a chance to participate and contribute toward goal setting.
- The goals of the committee should be clearly stated and understood by each member
- Consider circulating a list of committee goals and objectives with the agenda of meetings or posting them with the minutes.

**Consider expectations placed on the committee**

- Consult workers, supervisors and managers about their expectations for the committee and consider how these needs can be served most effectively.
- Make sure everyone knows what the committee can do and what it cannot do.
- State how concerns should be brought to the committee and how to deal with them.
- Consider how to handle complaints about the committee's performance.
- Consider how to evaluate the performance of the committee.
- Each year the committee should compare its performance against its stated goals.
- Draw up a plan to deal with short comings.
- Tell workers about successes so they will have confidence in the committee.
- Let the department's management know about committee members who have performed well so they can be recognized for their service.

**Plan meetings and use an agenda.**

- Provide members with a chance to contribute to the agenda.
- Put unresolved concerns from previous meetings on the agenda.
- Distribute meeting announcement and agenda before the meeting so members can prepare.
- Keep meetings focused on the agenda.
- Allow full, but business like discussion on each agenda item.
- Discourage any one person from dominating the meeting. Impose reasonable time limits for each agenda item. Follow rules of order.

### **Adopt a problem-solving approach.**

- Clearly define the problem - the immediate problem, its components and the root cause.
- Research issues where necessary. Do not jump to conclusions.
- Review relevant legislation, standards, manuals, etc.
- Select practical choices, those with the greatest chance of success.
- Corrective action is taken to protect workers and improve performance. Consider cost-effective ideas to help the department meet both objectives.
- Reach agreement through discussion and consensus rather than voting which can split the group into competing factions.
- Present recommendations. Ensure recommendations are practical and all relevant background information is included. Forward recommendations in a way that supports agreement and promotes action.
- Follow-up the corrective action taken.

**Prepare minutes promptly after meeting.** These minutes should be accepted by the committee and signed by both co-chairpersons. Once the minutes are accepted and approved by the committee, they will be distributed to committee members and posted on bulletin board.

## **2.5 MAKING RECOMMENDATIONS**

The primary function of Safety Committee is to make recommendations to improve health and safety and not to make policy. If the Safety Committee decides there is an issue on which they need to make a formal recommendation, then the following process will be adopted:

### **Identify the occupational health and safety issue**

- Determine that the issue relates to occupational health and safety and not something else (i.e. labor relations)
- Look beyond the obvious
- Identify the root cause (not just the symptom) and utilize additional internal and external resources as required

### **Provide supporting information**

- OSHA Regulations (minimum standard)
- Industry specific standards
- Technical manuals or manufacturer's specifications
- Statistical analysis where appropriate
- Staff/supervisor comments
- Workplace inspection reports
- Accident/incident investigation reports

### **Recommend reasonable solutions**

- Ensure solutions do not create additional hazards
- Attain OH&S committee consensus
- Prioritize the hazard and address how urgently the issue needs to be resolved
- Emphasize there is often more than one solution
- Short-term recommendations are acceptable until longer term solutions are implemented
- Set target dates for implementation

**Present the recommendations**

- Date the hazard complaint was received by the Safety Committee
- Identify the process by which the hazard was recognized; for example, workplace inspection
- Provide supporting information
- Set a target date for short and long term recommendations
- Set time frames and responsibilities
- Date, sign and send recommendations to Executive Safety Steering Committee to make changes

## **3.0 EDUCATION AND TRAINING**

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### **3.1 POLICY**

The policy of McCabe, Hamilton, and Renny is to meet all the requirements to provide health and safety related training for its employees. It recognizes the parallel results of integrating safe work practices and procedures into the workplace operations with the achievement of quality of services and maintenance of optimum productivity.

It is management's responsibility to ensure training needs are identified, appropriate training is provided to all employees and that records of all training are maintained. Supervisors have a critically important role with respect to safety related training. Their frontline observations allow them to assess whether employees are properly trained for their assigned tasks. They are in the best position to evaluate the training which has been provided, and where necessary, provide supplementary coaching or recommendations for improvements to training regimes. Workers have a duty to participate in health and safety related training provided to them by the company and apply this training to their work practices and procedures.

### **3.2 TRAINING DEPARTMENT**

The Company's Training and Employee Development Director has a shared responsibility with the Company Safety Manager for safety related and other types of training. Specifically, the Training and Employee Development Director shall be involved with:

#### **Identification of training needs**

- Recognition of specific workplace deficiencies (i.e. Ineffectiveness and/or inefficiency) which can be addressed through training
- Provision of refresher training, including training for re-certification where necessary
- Compliance with regulatory requirements for training
- Consultation and cooperation with recommendations for training by Safety Committees
- Establishment of training objectives on the basis of identified training needs
- Arrangement for providing training through:
  - Contracting with recognized, outside training providers
  - Organizing and utilizing departmental, in-house training
- Fostering formal and informal training provided by supervisors (eg. pre-op safety briefs and pre-project planning)

#### **Evaluation of training outcomes:**

- Where specific course training objectives were achieved (eg. test scores)
- When operational deficiencies were addressed and newly trained skills were applied and sustained in the workplace
- Success of the training in terms of costs versus benefits to the company
- Maintenance of records of training



- All records of training must be reported within one month after training to the Training and Employee Development Director
- Implementation of modifications to training objectives and/or delivery of training on the basis of evaluations of training effectiveness

### **3.3 SAFETY RELATED TRAINING**

McCabe, Hamilton, and Renny requires the following safety related training for all employees:

#### **General Orientation for all New Employees**

- To familiarize with general safe work practices and general safety rules
- To acquaint with safety legislation and worker duties

#### **Job Specific Orientation**

- To familiarize one with job specific hazards and means to control those hazards
- To familiarize with relevant safe work practices and safe work procedures

#### **Workplace Hazardous Materials Information System (WHMIS)**

for persons working with or near hazardous chemicals to know how to safely handle, use, store, and dispose of the specific hazardous chemicals used at the workplace and to understand the requirements for labeling and how to consult Material Safety Data Sheets. Department Directors must annually review the adequacy of Workplace Hazardous Materials Information System training and provide refresher training if needed

**First Aid Training** is to provide emergency first aid services at the workplace and must meet the following requirements:

- The number of persons trained at each workplace depends on the number of workers at the workplace: where there are 2-14 employees, at least one worker must be trained to the “emergency level” of training; where there are 15 or more but less than 200 employees, one worker must have a standard first aid certificate
- There will also be one additional worker trained to the emergency level for each group of 25 workers or part thereof (i.e. 105 workers requires 5 workers trained in the emergency level)
- First aid certificates must be issued by the American Red Cross. They normally expire after three years from date of training
- “Emergency first aid certificate” is issued upon successful completion of an eight hour training program; “standard first aid certificate” is issued upon successful completion of a 16 hour training program names of persons holding valid first aid certificates must be posted at the workplace

## Fall Arrest

- Workers who may be required to use fall arrest equipment must be trained in the proper use and inspection of the equipment
- The regular detailed inspections of fall arrest equipment must be performed by a certified “competent person”

**Operation Powered Industrial Truck Training:** MHR will develop and implement a training program based on the general principles of safe truck operation, the types of vehicle(s) being used in the workplace, the hazards of the workplace created by the use of the vehicle(s), and the general safety requirements of the OSHA standard. Trained operators must know how to do the job properly and do it safely as demonstrated by workplace evaluation. Formal (lecture, video, etc.) and practical (demonstration and practical exercises) training must be provided. The following topic will be included:

### Truck-related Topics

- operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate
- difference between the truck and the automobile
- truck controls and instrumentation: where they are located, what they do, and how they work
- engine or motor operation
- steering and maneuvering
- visibility (including restrictions due to loading)
- fork and attachment adaptation, operation and use limitations
- vehicle capacity
- vehicle stability
- any vehicle inspection and maintenance that the operator will be required to perform
- refueling and/or charging and recharging of batteries
- operating limitations

### Workplace-related Topics

- surface conditions where the vehicle will be operated
- composition of loads to be carried and load stability
- load manipulation, stacking, and unstacking
- pedestrian traffic in areas where the vehicle will be operated
- narrow aisles and other restricted places where the vehicle will be operated
- hazardous (classified) locations where the vehicle will be operated
- ramps and other sloped surfaces that could affect the vehicle's stability
- closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust
- other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

### Refresher training and evaluation

- Refresher training, including an evaluation of the effectiveness of that training, shall be conducted as required to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely. Details of Refresher training and evaluation are contained in Attachment E.

## 4.0 COMMUNICATIONS AND SAFETY

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The importance of good communications to ensure the safety of our employees cannot be overstated. Everyone on or at a worksite has a right to receive information needed to identify and control the hazards to which they may be exposed on the job in order to protect themselves. The Company's management, and particularly its supervisors, has a duty to obtain accurate and sufficient information about those hazards and communicate it effectively to the workers. Workers have a duty to report hazards to their supervisors and ask questions about any aspect of the job which they are unsure of.

There are many different ways to communicate and learn about health and safety including the following:

**Formal training** - courses, seminars, and conferences presented by authorized trainers focusing on specific topics.

**General safety meetings** - usually hosted by either the Department Director or the Senior Supervisor and held for both full and part time employees. Held periodically covering current issues in the workplace, review of safe work practices or procedures, emergency preparedness, and safety related general interest.

**Pre-project meetings** - usually hosted by either the Department Director or the Senior Supervisor and held prior the start of a new operations, intended to heighten general awareness of safe work practices specifically for the project.

**Pre-Shift Safety Brief** - brief (5 - 10 minutes), informal meetings led by the supervisor attended by the entire gang, and held at the beginning of each new shift consisting of informal review of the hazards likely to be met at the particular work site and how to control them. Provides opportunity for workers to ask questions.

**Individual work coaching** - this is one of the most important ways for workers, particularly new workers, to learn about the hazards of a job and the appropriate safe work practices. Usually the "coach" is the Foreman but may also be an experienced co-worker. Coaching is based on observing the worker performing the task and providing instructions to ensure development of the correct, safe procedures.

**Posting warning signs** - Posting of signs, in conspicuous locations containing warnings or cautions to be heeded so that workers may be alerted to particular hazards in the area.

**Hazard alerts** - single pages which may be circulated at the workplace, posted on the bulletin boards, or back of paychecks. Ideally it would describe how an accident happened and how to avoid similar accidents. Can describe hazards which are not readily noticeable.

**Safe work procedures** - step-by-step procedures developed especially for hazardous or critical tasks.

**Safety posters** - posted at workplaces to increase general safety awareness.

**Newsletters** - provide discussion of particular safety issues.

## **4.1 COMMUNICATIONS REQUIRED BY LEGISLATION**

McCabe, Hamilton, and Renny has assigned responsibilities to all employees to communicate with one another about safety and to control hazards and preventing injuries. Some of the responsibilities are listed below:

### **Management Duties**

- provide information, instruction, training, and supervision to ensure the health, safety, and welfare of workers
- consult with the Safety Committee on all matters pertaining to occupational health and safety at the workplace
- respond in writing within 30 days to formal recommendations made by the Safety Committee
- consult with the Safety Committee about scheduling workplace inspections
- ensure that workers, and particularly supervisors, are made familiar with health and safety hazards that may be met by them in the workplace
- establish and maintain an occupational health and safety program
- post the names of Executive Safety Steering and Safety Committee members in the workplace as well as the names of persons holding valid first aid certificates
- immediately report all accidents which resulted in serious injuries or death or had the potential to result in serious injuries or death
- maintain records and statistics on significant matters pertaining to health and safety including safety inspections and accident investigations

### **Worker Duties**

- immediately report a hazardous condition to one's supervisor
- bring outstanding safety concerns to the attention to the Safety Manager

### **Safety Committee Duties**

- receive complaints from workers as to their concerns about the health and safety of the workplace and keep records of the complaints and how they were dealt with
- make formal (written) recommendations to the Executive Safety Steering Committee regarding necessary improvements for the benefit of workplace health and safety
- hold regular committee meetings at least monthly and record and post minutes of the meetings
- keep records of workplace inspections and communicate findings to the Executive Safety Steering Committee

## **5.0 SAFE WORK PRACTICES AND PROCEDURES**

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### **5.1 POLICY**

McCabe, Hamilton, and Renny shall establish safe work practices at all its workplaces to minimize the risk of injury, illness and property damage. Specific safe work procedures will be developed for particularly hazardous and critical tasks. Safe work practices and procedures are written documents used to train and guide workers in performing their jobs safely.

Employees have a duty to comply with the safe work practices and procedures and utilize all safety devices provided to them. One of the important safe work practices required by the Company is personal protective equipment. All employees and other persons present at a workplace shall wear the personal protective equipment required for the work being performed. All persons needing to wear personal protective equipment shall be instructed in its proper use, and where appropriate, in its service and maintenance. All personal protective equipment shall be inspected routinely, kept in good working condition, and maintained in accordance with the manufacturer's instructions. Any personal protective equipment found to be of questionable reliability, damaged, or in need of service will be removed from use, reported to the supervisor, and repaired or replaced.

### **5.2 GENERAL SAFETY RULES**

All accidents, incidents, and injuries as well as unsafe acts and conditions observed by an employee are to be reported promptly to their immediate supervisor, and not later than the end of the working day. The supervisor shall prepare an Accident/Incident Report and Investigation Form (Attachment C) and submit to management through the Safety & Incident Group Email address.

- Employees are also required to report any concerns about poor workstation/task design and any early signs or symptoms of soft tissue injuries they may experience.
- All work must be carried out according to appropriate safe work practices and safe work procedures where applicable.
- Employees must wear proper Personal Protective Equipment (PPE) in accordance with safe work practices, and shall maintain and clean personal protective equipment which is issued to them.
- Equipment and Tools are to be used only for the purpose for which they were intended.
- Only Equipment and Tools which are in good repair shall be used.
- Equipment and Tools which are designed for use with guards and safety devices shall not be used if those guards or safety devices have been removed or tampered with.
- All Equipment and Tools which have been damaged or become worn are to be promptly tagged and taken out of service for repair or replacement.
- Good housekeeping practices must be maintained daily in all work areas and equipment. This includes personal work areas/offices.

- Employees are prohibited from arriving at work or remaining at work when their ability to perform the job safely is impaired for any reason.
- Horseplay, fighting, harassment of any kind, and otherwise interfering with another worker is strictly prohibited.
- Where there is a danger of entanglement, employees may not wear rings, watches, or other jewelry or loose fitting clothing, and shall confine long hair.

### **5.3 SAFE WORK PRACTICES AND PROCEDURES**

Safe work practices and procedures are ways of controlling hazards and doing jobs with a minimum of risk to people and property. Safe work practices are general in nature and can be applied to many different situations (i.e. use of ladders, hand power tools, etc.). Safe work procedures are designed to create a standard method of dealing with the specific situation whenever it comes up. They facilitate training, supervision and ensure employee protection from hazards.

Safe work procedures are a general requirement at all the Company work sites. They are written guidelines and methods for approaching and conducting work to prevent accidents and incidents. They also ensure the Company meets the relevant regulatory and industry standards. Safe work practices may be combined with safe work procedures.

The Company recognizes that certain jobs or tasks may be particularly hazardous or critical and therefore require more specific, step-by-step procedures to ensure work is carried out safely. Each Safe Work Procedure must be developed to fit the particular worksite, equipment and process. The Safe work procedure should identify the hazards associated with the situation and describe the relevant regulations, standards to be met, and practices to be followed.

Safe work procedures provide standards for how work is carried out. Employees who actually do the job must be involved in the development of safe work procedures. They are the ones who know the tasks and can provide the best information. If those who carry out the work are not involved, there is a chance the safe work procedure will not reflect real life in the workplace. If this is the case, workers will be reluctant to follow the written procedure.

A number of safe work practices and procedures are included in Attachments D through G. Additional safe work procedures will be developed in accordance with recommendations from Safety Committee as well as indications from job hazard analysis which may be conducted by supervisors.

### **5.4 HOUSEKEEPING**

The importance of good housekeeping at a workplace is to prevent accidents and injuries.

- Workplace housekeeping is traditionally defined as keeping the job site clean and orderly. Such as:
  - maintaining floors and surfaces
  - keeping aisles, exits and stairs free of clutter, clearly marked and well-lit
  - controlling minor spills and responding to them quickly when they occur
  - ensuring adequate and safe storage areas

- handling and disposing waste
- proper stowage of equipment and materials not in use,
- clear of debris, projecting nails, strapping, and other sharp objects not necessary for the work in progress.
- hatch beams, covers, and pontoons placed in terminal working areas shall be stowed in stable piles with beams secured against tipping or falling;
- beams and pontoons are stowed in tiers more than one high, dunnage or other suitable material shall be used under and between tiers
- cargo and material shall not obstruct access to vessels, cranes, vehicles, or buildings.

Good housekeeping includes management planning – the planning of the movement of materials from the point of entry to the point of exist, and planning of the workplace environment to ensure the safe movement of people and materials on a daily basis.

## **5.5 HAZARD RECOGNITION, EVALUATION, AND CONTROL**

McCabe, Hamilton, and Renny is committed to doing all that is reasonable and practicable to protect the health, safety, and welfare of its employees. Because most workplace injuries and illnesses are directly or indirectly attributable to workplace hazards, the Company has implemented a program to identify and control the hazards at each workplace. The program includes the following elements:

- Consistent monitoring of each workplace to identify existing and potential hazards.
- Monitoring is accomplished through comprehensive inspections of tools, equipment, and facilities as well as work practices.
- Periodic reviews of relevant industry and legislative standards.
- Maintaining a system of hazard reporting and assessing the risk of actual harm to employees or damage to equipment and/or cargo.
- Implementing effective controls of identified hazards.

The Company recognizes that hazard identification and control are a critical part of preventing workplace injuries, illnesses, and damage. All employees are required to participate in hazard identification by reporting to their supervisor any situation which they believe could cause harm.

Additionally MHR will support the monitoring efforts of the Safety Manager and the Safety Committee and consult with them on their findings. All hazards identified shall be addressed in accordance with the hazard assessment.

### **5.5.1 HAZARD REPORTING**

The Company has adopted a formal hazard reporting system to ensure that all hazards identified are duly reported and receive appropriate corrective action.

Two forms have been developed to support the company’s hazard reporting policy;

MHR HAZARD REPORT FORM Attachment (A) is a mandatory report that will be submitted by the onsite supervisor to the Safety Manager, the Safety Committee, and the Executive Safety Steering Committee when a hazard has been identified and either temporary or permanent controls have been put in place.

All employees have the right and the responsibility to immediately report a hazardous condition to one's supervisor or bring safety concerns to the attention to the Safety Manager; to facilitate the reporting procedure, the EMPLOYEE SAFETY SUGGESTION FORM shown on Attachment (B), is available for workers to submit when they believe it would be the best way to identify the Hazard and ensure that a permanent control is put in place.

The completed forms will ensure that appropriate assessment and controls have been taken, monitoring is in place, and that an appropriate record is kept

A worker who identifies a hazard can report it to the on-site supervisor verbally and the supervisor in turn, shall ensure that appropriate controls have been put in place to eliminate the hazard. If the worker believes that the matter has been adequately dealt with, it may not be necessary to complete the form.

### **5.5.2 HAZARD ASSESSMENT AND CONTROL PROCESS**

The supervisors must identify, assess, and control worksite hazards. This includes hazards that OSHA standards cover as well as other recognized hazards that are causing or likely to cause death or physical harm to workers. To identify such worksite hazards, the supervisors shall:

- inspect the worksite
- review past safety and health information
- evaluate the seriousness of identified hazards.

After identifying and assessing worksite hazards, the on-site supervisor needs to control them. The process of controlling hazards should include:

- correcting unsafe or unhealthy conditions immediately
- providing interim employee protection where hazards cannot be corrected immediately, and monitoring progress toward correction

McCabe, Hamilton, and Renny has established a hazard assessment and control process that is systematic and is conducted by the supervisors prior to the start of every operation no matter how often the operations has been conducted in the past.

The hazard assessment and control process should address workplace hazards that cause or are likely to cause death, illness, or serious physical harm to employees. As part of the process the following shall be used to identify and evaluate serious workplace hazards:

**Reviewing records of injuries:** The Safety Committee will review injury logs to learn what caused problems in the past and how they can be avoided in the future.

**Reviewing other safety and health information:** The Company's Safety Manager will review all information and reports from MHR's insurance company, "safety alerts" distributed by trade associations and other organizations, employee safety and health complaints, material safety data sheets, and safety and health warnings from equipment manufacturers.

**Workplace walk around inspections:** Supervisors will conduct a walk around inspection at the worksite prior to the start of each shift and record hazardous conditions and actions that were taken. The walk around should be comprehensive -- from one end of the worksite to the other.



**Checklists to inspect the worksite:** Checklists have been developed based upon common hazards that have occurred or are known to be present in particular operations or processes.

**Job Hazard Analyses (JHAs):** By identifying hazards associated with specific tasks, the company will be more successful in finding ways to eliminate or control the hazards. The Company Safety Manager and Safety Committee will divide all jobs into components or tasks to pinpoint factors that may be contributing to the problem.

**Investigating accidents:** These investigations can reveal the root cause, chain of events or unsafe acts or conditions that led up to the accident.

**Evaluating new equipment, materials, and processes.** These can bring new hazards into the workplace, and the best time to address them is before they are introduced.

### 5.5.3 CONTRIBUTING FACTORS

When hazards are identified, there may be more than a single factor; therefore the Executive Safety Steering Committee, the Safety Manager, the Safety Committee, and supervisors shall consider the relative contributing factors when identifying a hazard. These contributing factors are:

**People:** contractors, visitors, suppliers, and the general public, management who establish departmental policies, practices, and standards, engineers and designers who create the workplace environment, preventive maintenance workers, supervisors and workers

**Equipment:** tools, machines, vehicles, and personal protective equipment are often a significant contributing factor to creating hazards

**Materials:** chemicals, used in the workplace can also contribute to the formation of hazards

**Environment:** the physical environment, such as the weather, or the non-physical environment such as leadership style, workplace culture, and labor relations tensions

### 5.5.4 HAZARD ASSESSMENT

The purpose of hazard assessment is to assist the Executive Safety Steering Committee, the Safety Committee, the Safety Manager and supervisors in making decisions about how to address and control workplace hazards (Attachment (H) "Hazard Assessment Form"). Full and accurate information, including all possible alternatives, should be provided to the Committees they can make intelligent, informed decisions concerning hazard control. Additionally the level of risk associated with the hazard shall be established in order to prioritize the corrective action. Hazards should be addressed in accordance with the principle of - "correct the hazards with the highest risk first", or "worst first". Another possible reason estimating the risk associated with a hazard would be when one or more members of the workplace begin to overreact because of the presence of a hazard, expressing a level of fear or agitation which is disproportionate to actual risk of harm. In this situation, a careful and reasoned evaluation of the risk may help to restore a more rational outlook and attitude about the hazard.

Risk analysis, involves a careful prediction of the consequences of an accident caused by the hazard. The level of risk associated with a hazard is estimated by considering a combination of two factors:

(1) the likelihood of the hazard causing an accident and, (2) the consequences if it did happen, in terms of harm to people and/or damage to property.

## HAZARD RISK ASSESSMENT MATRIX

Frequency of Occurrence	Hazard Categories			
	1 Catastrophic	2 Critical	3 Serious	4 Minor
(A) Frequent	1A	2A	3A	4A
(B) Probable	1B	2B	3B	4B
(C) Occasional	1C	2C	3C	4C
(D) Remote	1D	2D	3D	4D
(E) Improbable	1E	2E	3E	4E



### Hazard Likelihood Category

Probability estimates based on frequencies or actual occurrences shown in past experience are desirable. If that data is not available, the following definitions may be used:

- Almost Certain:** likely to occur immediately or within a short period of time when exposed to the hazard
- Likely:** will occur in time, eventually
- Possible:** possible to occur in time; could occur at some point
- Unlikely:** unlikely to occur
- Rare:** very unlikely

### Hazard Severity Category

A severity estimate is based on the potential destructive consequences; the following definitions may be used:

- Catastrophic** - may cause death or loss of a facility
- Major** - may cause serious injury, severe occupational illness or major property damage
- Moderate** - may cause minor injury, or illness resulting in lost work days, or minor property damage
- Minor/Insignificant** - probably would not affect personal safety or health and thus, less than a lost work day, but nevertheless is in violation of specific criteria

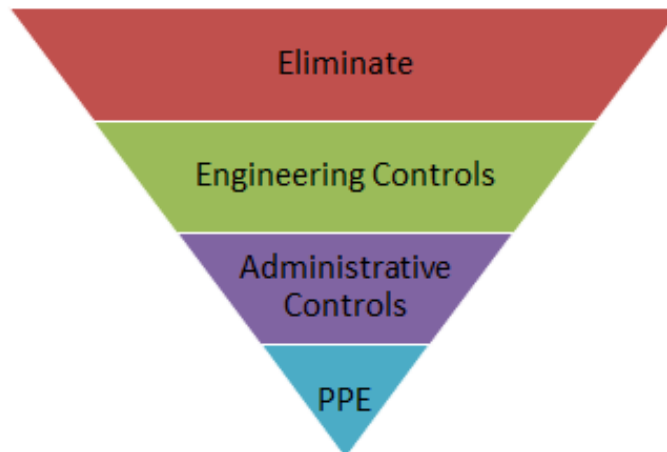
## Ranking Hazards

Once hazards have been identified or anticipated, they must be ranked to set corrective action priorities based on the case with the highest risk. Corrective action is to develop or improve controls and reinforce safe work practices. Attachment (H) contains a “Hazard Assessment Form” that shall be used when doing a risk evaluation.

### 5.5.5 HAZARD CONTROL

Assessing and controlling hazards are interrelated. Often the assessment process will reveal workplace hazards that need to be corrected. After serious hazards have been identified and analyzed, the Company needs to control them. In workplaces where the hazard assessment indicates that quite a few serious hazards are present and may take time to correct, the Executive Safety Steering Committee will set priorities for controlling the most serious hazards first. In such cases, the Executive Safety Steering Committee will set timetables for correcting these hazards and carefully track progress in achieving these fixes.

Where hazards are present in the workplace, the Executive Safety Steering Committee, the Safety Committee, and supervisor needs to implement feasible controls to eliminate or reduce them. To control hazards, McCabe, Hamilton, and Renny will use the following hierarchy of hazard control to minimize or eliminate exposure to hazards:



#### Control of the Hazards through:

**Elimination the hazard** - The very best method of controlling a hazard is to eliminate it completely, if possible. Elimination of the hazard is not always achievable though it does totally remove the hazard and thereby eliminates the risk of injury. This is the best a way to protect workers.

**Engineering Controls** - Engineering Controls involve redesigning a process to place a barrier between the person and the hazard or remove the hazard from the person, such as machinery guarding, proximity guarding, extraction systems or removing the operator to a remote location away from the hazard.

**Administrative Controls** - Administrative controls include adopting standard operating procedures, safe work practices and providing appropriate training, instruction and/or information to reduce the potential for harm and/or adverse health effects to person(s).

- **Work Procedures, Training, and Supervision** - Supervisors will be trained to apply modern safety management and supervisory practices. The Safety Committee and Safety Manger shall help the other departments periodically review and update operating procedures and worker training.
- **Emergency Planning** - Written plans should be in place to handle fires, chemical spills, and other emergencies. Workers should be trained to follow these procedures and use appropriate equipment. Refresher training should be provided regularly.
- **Housekeeping, Repair, and Maintenance Programs** - Housekeeping includes cleaning, waste disposal, and spill cleanup. Tools, equipment, and machinery are less likely to cause injury if they are kept clean and well maintained.

**Personal Protective Equipment (PPE) and Clothing** - Personal protective equipment and clothing must be used at all times. However, Personal protective equipment is much less effective and it is not a substitute for other controls since it does not eliminate the hazard. PPE is usually seen as the last line of defense and is usually used in conjunction with one or more of the other control measures. Note: The Company requires workers to use personal protective equipment wherever its use is prescribed by regulations or internal work procedures. Workers must be trained to use, store, and maintain their equipment properly. Management, supervisors, and workers must understand the limitations of their personal protective equipment.

## 5.5.6 SELECTING AND MONITORING CONTROLS

**Selecting Controls** – After identifying the hazards the Executive Safety Steering Committee, the Safety Committee, and/or the supervisor, shall assess the risks and review any existing controls, all hazards must be managed before people are hurt, become ill or there is damage to cargo, equipment or the environment. The most effective control option/s should be selected to eliminate or minimize risks.

There are several factors to consider when selecting or rejecting control measures. These factors have a bearing on the fundamentally important requirement to:

- Justify the adequacy of control measures (where “adequacy” means “adequate to eliminate risk or reduce it so far as practicable”);
- Identify potential failures; and
- Define performance indicators for the control measures.

The following sets out a series of core questions that shall be considered when selecting or rejecting control measures:

- Are there controls clearly linked to each hazard,
- Has the hierarchy of control measures been considered, with measures to eliminate the hazard adopted first if practicable, followed by measures to prevent, reduce and mitigate?
- What is the functionality of a control measure against the relevant hazards?
- Is it sufficient to control the hazard in the intended manner, i.e. is it fit for purpose, will it suppress the hazard completely, prevent escalation or simply mitigate effects?

- Is the control measure able to function as intended during the types of accidents it is intended to reduce or mitigate?
- Is the reliability of individual control measures, and of all control measures in combination, appropriate to the level of risk presented by the associated hazards?
- Are the control measures maintainable?
- Are new control measures compatible with the operation being conducted, and any other control measures already in use?
- Can the control measures be implemented considering their availability and cost?

**Monitoring the effectiveness of controls** – Sometimes hazard controls do not work as well as expected. Therefore, the Safety Committee or Safety Manager should monitor the effectiveness of the corrective action taken by the department during their inspections. The following are appropriate questions:

- Have the controls solved the problem?
- Is the risk posed by the original hazard contained?
- Have any new hazards been created?
- Are new hazards adequately controlled?
- Have workers been adequately informed about the situation?
- Have orientation and training programs been modified to deal with the new situation?
- Are any other measures required?

The effectiveness of hazard controls should be documented in the inspection report, and if appropriate, in the Safety Committee minutes.

## **5.6 PERSONAL PROTECTIVE EQUIPMENT**

In terms of hazard control, personal protective equipment (PPE) is considered a method of last resort and should not be used as a substitute for other reasonable measures in the control of a hazard. The proper use of this equipment may reduce or eliminate the extent of harm or injury and therefore its importance must not be under-estimated. It is critical that the appropriate personal protective equipment for the situation is used, and that:

- its limitations are fully understood
- the person using the personal protective equipment is trained in its use, care and maintenance
- is regarded by the person using it as normal attire for working in that environment or with the particular hazard

The Company holds each individual to whom personal protective equipment has been issued fully accountable for maintaining it in good operating condition. The Safety Manager will purchase all PPE and will distribute to either the individual employees or to the onsite supervisors, depending on the circumstances i.e. sufficient gloves will be provided to the supervisor for further distribution to the workers performing the tasks that require it.

### **5.6.1 SKIN, HANDS, AND BODY PROTECTION**

Clothes are a major line of defense against hazards on the job. Employees must always dress suitably for work. Work such as the discharge of coal, cement and or loading scrap metal may require special clothing such as disposable coveralls. Gloves should be worn if what is being handled that may cause puncture, cut or abrade the skin.

### **5.6.2 EYE AND FACE PROTECTION**

The supervisor shall ensure that each affected employee uses appropriate eye and/or face protection where there are exposures to eye and/or face hazards. Such equipment shall comply with American National Standards Institute, ANSI Z-87.1-1989

For employees wearing corrective spectacles must be of a type which can be worn over spectacles. Prescription ground safety lenses may be substituted if they provide equivalent protection.

Eye protection equipment shall be maintained in good condition.

### **5.6.3 HEAD PROTECTION**

The supervisor shall ensure that each affected employee wears a protective helmet when working in areas where there is a potential for injury to the head from falling objects.

Such equipment shall comply with American National Standards Institute, ANSI Z-89.1-1986, "Personnel Protection -- Protective Headwear for Industrial Workers-Requirements."

### **5.6.4 FOOT PROTECTION**

The supervisor shall ensure that each affected employee wears protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects or objects piercing the sole.

Such equipment shall comply with American National Standards Institute, ANSI Z-41-1991, "American National Standard for Personal Protection-Protective Footwear."

### **5.6.5 HEARING PROTECTION**

Where the level of noise is sufficiently intense, it will pose a potential hazard to the hearing of employees who are exposed to it for long periods of time. The supervisor shall ensure hearing protection (disposable ear plugs) is available for all operations.

### **5.6.6 RESPIRATORY PROTECTION**

#### ***5.6.6.1 General Information***

In the control of those occupational exposures related to the inhalation of breathing air contaminated from gases, aerosols, vapors, dusts, fumes, and mists. The primary objective is to safeguard the employees' health and prevent excessive exposures.

This should be accomplished as much as possible by engineering control measures, e.g., general and local ventilation, enclosure or isolation, substitution of a less hazardous process or material.

When effective engineering controls are not feasible, or while they are being instituted, appropriate respiratory protection will be required.

A respiratory protection device, commonly known as a respirator, includes devices that provide the human respiratory system with protection from toxic substances. Respirators include, but are not limited to, self-contained breathing apparatus (SCBA), supplied air systems and air purifying types that filter out nuisance dust, toxic dust, cynic vapors, metal fumes, etc.

#### **5.6.6.2 Responsibilities:**

**The Safety Manager** has the overall responsibility for the Respiratory Protection Program (RPP) and has the responsibility for and authority to:

- Serve as the primary OSHA contact and program administrator.
- Ensure the overall program complies with applicable regulatory standards.
- Ensure an appropriate training program is established for potential respiratory uses.
- Check that only appropriate and approved respirators are stocked.
- Work with company responsible individuals to make sure that preventative maintenance and recording keeping are maintained for the Respiratory Protection Program.
- Act as the technical consultants on matters of respiratory fit testing, selection, care, and use.

**All supervisory personnel** are responsible for:

- Making sure the proper respirators are available as needed for their employees.
- Ensuring their employees are properly trained, fitted, and enforce the wearing respirators as required.
- Preventing the use of unauthorized respirators in their area of responsibility.

**The employee** is responsible for:

- Using the respirator supplied to him/her in accordance with instructions and training.
- Reporting any problems with use of the respirator to their supervisor such as facial fit, broken parts, breathing problems, etc.

#### **5.6.6.3 Respirator Selection**

- Respirators are selected and approved by the Safety Manager in consultation with Department Directors.
- The choice is based on the physical and chemical properties of the air contaminants and the concentration likely to be encountered.
- The quality of fit and the nature of the work being done also effect the choice of respirators. The capability of the respirators chosen is determined from appropriate government approvals, manufacturers' test and facility experience with the particular type of respirators.

#### **5.6.6.4 Respirator Source and Distribution**

- Respirators are issued to individuals by the Safety Manager.
- All approved respiratory protection devices are available from places designated by the Safety Manager.
- Respiratory equipment, testing and monitoring shall be provided by the company at no cost to employees.
- Under no circumstances will a respirator be issued to an employee who has not been properly trained in its use.

#### **5.6.6.5 The Effects of Personal Factors in the use of Respirators**

There are a number of personal factors affecting the use of respirators by an individual. Some of the factors included facial features, such as the absence of dentures, facial scars, size and shape of one's face, eyeglasses, facial hair, and physical capability, i.e., medical factors. Further discussions of these factors are presented below:

##### **Facial Features**

The variation in size and shape as well as scars, disfigurement and/or the absence of dentures have to be considered when selecting the correct respirator. This is especially important for the air purifying type respirators, because they operate with negative pressure. There is no margin for error. They must fit properly to do the job.

During training and fit testing for air purifying respirators, multiple sizes and/or types should be tested until a good fit and seal is achieved. Then the employee should always wear that style and size respirator. Although these personal factors are not as critical when wearing air supplied positive pressure respirators, employees must be capable of clearly demonstrating effective fitting and use of that respirator.

##### **Corrective Eye Wear**

Any normal pair of glasses can be work with a half-face respirator because the temple pieces of the glasses do not interfere with the seal. They cannot be worn with any full face piece respirators because the temple pieces will prevent a proper seal. This applies to both positive and negative pressure respirators.

Employee who wears glasses in order to perform work safely while wearing a full face piece respirator must obtain a set of specially framed corrective glasses that fit inside the face piece. Contact lenses should never to be worn in a shipyard environment.

##### **Facial Hair**

Facial hair will affect the quality of the seal and can cause leaking to occur. Because of this, a respirator cannot be worn by an employee with facial hair that interferes with the seal of the respirator. A small mustache will be permitted as well as neatly trimmed sideburns, but only if they do not prevent a good seal.



While OSHA does not require an employee who wears a respirator to be clean shaven, it is recognized that optimal protection occurs if the employee is clean shaven. In certain cases, it may be necessary for employees working potentially dangerous jobs to be clean shaven.

### **Physical Capability (Medical Problems)**

These are some physical conditions, e.g., cardiovascular diseases and/or decreased pulmonary functions, that could make wearing a respirator difficult or impossible. In order to identify these employees, a brief questionnaire will be filled out during the respirator training program. Any answers that may indicate a problem will be reviewed by management and the Safety Department, who will decide what action, is to be taken. If the employee is restricted from wearing respiratory protection, it will be noted in his record in order to prevent his assignment to a job requiring respiratory use.

#### **5.6.6.6 Training**

General Requirements:

- Employees who are required to wear respirators in the performance of their regular assigned job must receive training on an annual basis.
- Employees who are not normally required to wear a respirator, but are assigned to a specific job requiring the use of a respirator must receive training prior to using the respirator.
- Respiratory training will be conducted by the Training Director. Training will consist of the following:
  - A description of the human respiratory tract
  - The limitations and uses of the respirator
  - How to properly wear, fit and make necessary adjustments, including the changing of filters
  - Identification of major parts of the respirator and how they work
  - Cleaning, storage and inspection of respirators
  - A negative, positive pressure test and qualitative fit test
- This training will be done on an annual basis. Employees will be retrained if there is a change in respiratory policy, a change in the style or brand of respirator, or when an employee experiences a physical change in facial features. New employees will be trained prior to starting work if their job requires respiratory protection.
- The training program will be periodically evaluated by both the Training Director and the Safety Manager.

### **5.6.6.7 Inspection, Cleaning, and Maintenance**

This section will apply only to non-disposable respirators and to self-contained breathing apparatus. It does not apply to any disposable type of respirator such as the Modex 3400 or the 3M9920.

All respirators shall be inspected routinely by the user before and after each use. The employee will check for the condition of the face piece, head bands, valves and hoses.

Items that should be checked are:

- Air purifying respirators, rubber face piece, check for:
  - Excessive dirt
  - Cracks, tears or holes
  - Distortion from improper storage
  - Cracked, scratched or loose fitting lens (full face piece)
  - Broken or missing mounting clips
  
- Head straps, check for:
  - Breaks
  - Loss of elasticity
  - Broken or malfunctioning buckles or attachments
  - Excessively work head harness which might allow the face piece to slip
  
- Inhalation valve, exhalation valve, checks for:
  - Detergent residue, dust particle or dirt on valve or valve seat
  - Cracks or tears in valve material
  - Missing or defective valve cover
  - Filter elements, check for:
    - Proper filter for the hazard
      - Approved designation
      - Missing or work gaskets
      - Worn threads (both filter threads and face piece)
      - Cracks or dents in filter housing

The supervisor and/or foreman shall make periodic assessments of the respirators to determine cleanliness and physical condition.

*Note: Worn or dirty respirators shall be taken out of service and appropriate actions taken to assure future compliance with program guidelines.*

Maintaining Respirators failing the inspection will be replaced or repaired immediately. Repairs will be performed by a third-party service provided. The user is not authorized to make repairs. He will turn in any unsafe respirator to the tool room where it can be repaired by experienced personnel. No attempt is to be made to replace components, or make adjustments, modifications or repairs beyond the manufacturer's recommendation.

### **5.6.6.8 Storage**

Disposable single use respirators shall be stored in their original, unopened containers until needed.

Non-disposable respirators should be packed or stored so the face piece and exhalation valve will rest in a normal position. They need to be protected against extreme heat and cold, dust, excessive moisture, or damaging chemicals by placing them in a sealed container or bag.

### **5.6.6.9 Records**

The following records should be maintained:

A record of employee training programs and attendance, medical evaluation, questionnaire, and fit testing results shall be maintained at the facility.

Records of any medical problems preventing an employee from wearing a respirator under his given work conditions shall be kept on file in the Human Resource Department.

## **5.6.7 FALL ARREST/RESTRAINT SYSTEMS**

Supervisors shall ensure that body belts and harnesses are used to provide workers working at heights above ground a level of freedom to move and protection from falls. The Fall Protection requires that, where a person is exposed to the hazard of falling from a work area that is:

- 6 feet or more above the nearest safe surface or water
- above a surface or thing that could cause injury to the person on contact
- a guardrail may be used instead of a fall arrest system
- a fall-arrest system consists of:
  - full body harness
  - lanyard

All safety belts, full body harness and lanyards must be ANSI-certified. Full body harnesses must be snug-fitting and worn with all hardware and straps intact and properly fastened.

## **5.6.8 OTHER PROTECTIVE MEASURES**

### **5.6.8.1 Protective clothing:**

Supervisor shall direct employees to wear the necessary special protective clothing when performing work that requires special protective clothing.

### **5.6.8.2 Personal Flotation Devices (PFDs).**

The supervisor shall provide and direct the wearing of PFDs for those employees, who are engaged in work in which they may be pulled into the water such as:

- line handlers
- employees are working in isolation
- where physical limitations of available working space creates a hazard of falling into the water

- where the work area is obstructed by cargo or other obstacles which prevents employees from obtaining safe footing for their work
- PFDs (life preservers, life jackets, and work vests) worn by each affected employee must be United States Coast Guard (USCG) approved pursuant to 46 CFR part 160 (Type I, II, III, or V PFD) and marked for use as a work vest, for commercial use, or for use on vessels. Personal flotation devices shall be maintained in safe condition and shall be considered unserviceable when damaged so as to affect buoyancy or fastening capability.

**5.6.8.3 Emergency facilities** - When employees are exposed to hazardous substances which may require emergency bathing, eye washing or other facilities, the MHR shall provide such facilities and maintain them in good working order.

## 6.0 INSPECTION PROGRAM

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### 6.1 POLICY

It is the policy of the McCabe, Hamilton, and Renny to maintain a comprehensive program of health and safety inspections at all its workplaces and facilities. Inspections are an essential method of identifying existing and potential hazards for corrective action. They are also a means of determining the level of compliance with established standards for hazard controls, safe work practices, job procedures and safety rules.

All members of the Company have a role in conducting workplace inspections.

All employees are required to participate in the Inspection Program through informal inspections of their workplaces.

Employees are expected to maintain a practiced awareness which identifies potential hazards.

Employees have a duty to report all hazards to their supervisors.

Supervisors are responsible for conducting pre-operation and pre-shift inspections of all their workplaces and correcting or controlling all hazards noted.

Safety Committees or Safety Manager shall be all involved in formal inspections. They shall participate in inspections, record and analyze results, make recommendations for corrective action and follow up to ensure proper corrective actions have been taken.

As part of its Inspection Program, the Company shall ensure that preventative maintenance of all its tools and equipment is being conducted as required.

The Executive Safety Steering Committee will administer an annual audit of the overall Occupational Health and Safety Management System to ensure it is successfully implemented and kept current with changing conditions.

### 6.2 TYPES OF INSPECTIONS

Inspections usually consist of walking through the workplace to determine the level of compliance with OSHA standards for hazard controls, safe work practices and procedures. It is often advisable to speak with workers and supervisors in the area to find out if they are aware of possible problems. Unlike accident investigations which are usually conducted in reaction to an event, scheduled inspections are usually proactive measures.

- The purpose of inspections is to identify:
  - potential problems
  - equipment deficiencies
  - improper employee action
  - inadequacies in hazard controls or remedial actions
  - the effects of change, including new hazards that were not previously identified

The Company conducts three types of inspections:

Formal inspections are scheduled on a monthly basis and are conducted by the Safety Manager along with one member of either the Executive Safety Steering Committee or Safety Committee. The findings of formal inspections must be recorded in an inspection report which is filed with the Safety Committee.

Pre-use inspections refer to inspections of equipment before it is put in operation. OSHA requires that all Power Industrial Trucks be examined at least daily before being placed in service. Equipment used on a round-the-clock basis must be examined prior to the start of each shift. All equipment in need of repair, defective or in any way unsafe, shall be taken out of service immediately. Any problems should be recorded on the appropriate documents and reported to a supervisor.

Pre-shift inspections are ongoing inspections conducted by the supervisors as part of their job responsibilities. Hazardous conditions are to be reported using the MHR HAZARD REPORT FORM Attachment (L) and are either corrected immediately or reported for corrective action. The Pre-shift shall be comprehensive -- from one end of the worksite to the other. The Pre-Shift inspection reports shall be forwarded to the Quality Management Team along with the daily logs.

### **6.3 INSPECTION RELATED FORMS**

A number of forms are available to assist Safety Committees and on-site supervisors in doing inspections. The available forms shown in the list below may be found in the following attachments:

Attachment I Administration Office Inspection Checklist  
Attachment J Shop Safety Inspection Checklist  
Attachment K Pier Inspection Checklist  
Attachment L Pre-Shift Inspection Checklist and Report  
Attachment M MHR EQUIPMENT Pre-Use INSPECTION FORM

**Note:**

- ***Inspectors should not avoid inspecting any aspect of the workplace because it does not appear on the checklist.***
- ***Pre-Shift inspections of the worksite and Pre-Use inspections of equipment are not optional; they are mandatory.***

## 7.0 ACCIDENT/INCIDENT INVESTIGATION PROGRAM

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### 7.1 POLICY

It is the policy of McCabe, Hamilton, and Renny to thoroughly investigate all accidents when an employee is injured, if there was significant damage to property, as well as accidents which did not result in injury and/or significant property damage but had reasonable potential to do so (“near misses”). All employees have a duty to report accidents and incidents to their supervisors. Supervisors have a responsibility to investigate all accidents and incidents to determine the causes of the accident, and in particular, the root causes, so that corrective measures can be put in place to prevent similar events. Attachment (C), Accident/Incident Report and Investigation Form has been developed to standardize the report and to ensure that all issues are addressed.

### 7.2 LEGAL REQUIREMENTS TO REPORT SERIOUS ACCIDENTS

OSHA’s updated recordkeeping rule expands the list of severe injuries that MHR must comply with the new requirements on January 1, 2015 and report the following to OSHA:

- All work-related fatalities;
  - must be reported within 8 hours of finding out about them and/or within 30 days of a work-related incident
- All work-related inpatient hospitalizations of one or more employees;
  - must be reported within 24 hours of the incident
- All work-related amputations;
  - must be reported within 24 hours of the incident
- All work-related losses of an eye
  - must be reported within 24 hours of the incident

MHR has three options for reporting the event; by telephone to the nearest OSHA Area Office during normal business hours or by telephone to the 24-hour OSHA hotline at 1 800-321-OSHA (6742).

**Note: OSHA is developing a new means of reporting events electronically, which will be available soon at [www.osha.gov](http://www.osha.gov)**

When reporting a fatality, inpatient hospitalization, amputation or loss of an eye to OSHA the following information must be provided:

- Company name
- Location of the work-related incident
- Time of the work-related incident
- Type of reportable event (i.e., fatality, inpatient hospitalization, amputation or loss of an eye)
- Number of employees who suffered the event
- Names of the employees who suffered the event
- Contact person and his or her phone number
- Brief description of the work-related incident

## **7.3 GUIDELINES FOR INVESTIGATING ACCIDENTS/INCIDENTS**

### **Investigation Team**

The supervisor is responsible for the initial investigation of all accidents and incidents as well as submitting relevant reports as required in this manual. The supervisor may request assistance from members Safety Committee or the Safety Manager, if he/she is having difficulty and/or he/she believes due to the seriousness of the incident dictates assistance.

### **Conducting an Investigation**

The supervisor or investigating team will gather all the relevant information about the accident with a view to identifying and recording the causes of the accident, the time, location, conditions, work being performed, etc. If possible relevant, photos should be taken, sketches drawn and witnesses interviewed. Often the immediate causes of the accident will be readily apparent. The task of the investigators is to determine the root causes as well asking the question “why” the immediate causes were allowed to develop. The contributing factors of people, equipment, materials and environment shall also be analyzed.

### **Reporting the Findings of the Investigation**

The findings of the investigation must be reported by the supervisor or the investigation team using the Accident/Incident Investigation Report form (Attachment (C)). Completion of all the questions on this form will guide the investigators to gather the necessary information, perform analysis of the information to identify the causes of the accident, and make recommendations for hazard controls so that similar accidents will not recur. The report must be signed by the supervisor and, where applicable, other members of the investigating team. The supervisor must forward the completed report to the SafetyIncident email group, which includes all those individuals required in accordance with this manual i.e. the Safety Committees members and Safety Manager

## **7.4 FOLLOWING UP ON RECOMMENDATIONS**

After identifying the immediate causes and root causes of the accident or incident, the investigator(s) must recommend corrective measures to be put in place to prevent similar accidents or incidents. The supervisor responsible for the worksite, in combination with other management personnel where necessary should implement the hazard control measures. Follow up in terms of monitoring the effectiveness of the control measures, is necessary.



## 8.0 EMERGENCY ACTION PLAN

The objective of the McCabe, Hamilton, and Renny's Emergency Action Plan is to comply with the Occupational Safety and Health Administration's (OSHA) Emergency Action Plan Standard, 29 CFR 1910.38, and to prepare employees for dealing with emergency situations. This plan is designed to minimize injury and loss of human life by training employees, procuring and maintaining necessary equipment, and assigning responsibilities. This plan applies to all emergencies that may reasonably be expected to occur at McCabe, Hamilton, and Renny all Honolulu offices and piers, as well as facilities in Nawiliwili, Kauai and Kahului, Maui.

### 8.1 ASSIGNMENT OF RESPONSIBILITY

#### 8.1.1 Emergency Plan Manager

The Safety Manager shall manage the Emergency Action Plan as well as schedule routine tests of the MHR emergency notification system with the appropriate authorities. The Training and Employee Development Director shall maintain all training records pertaining to this plan.

The Safety Manager shall also coordinate with local public resources, such as fire department and emergency medical personnel, to ensure that they are prepared to respond as detailed in this plan.

#### 8.1.2 Responsible Persons

The Responsible Persons are as follows:

Bldg./Dept.	Primary Name and Position	Primary Phone #	Alternate Name and Position	Alternate Phone #
Admin Office	<b>Kim Hudson Chock</b> CFO	808-224-7665	<b>Nalani Foreman</b> HR Director	808-630-0112
Piers	<b>Jimmy Zane</b> VP of Operations	808-864-2245	<b>Arne Pelesasa</b> Sr. Supervisor	808-864-2242
Shop	<b>Andrew Souza</b> Director of Equipment & Maint.	808-479-0356	Safety Manager	
All others	Safety Manager			

The Responsible Persons are responsible for instituting the procedures in this plan in their designated areas in the event of an emergency. *(Note: Coordinators may also be given the responsibility of accounting for employees/visitors after an evacuation has occurred.)*

The following individuals shall be responsible for assisting employees who have disabilities or who do not speak English during evacuation:

Bldg. Number/Section/Dept.	Name of Person Requiring Assistance	Phone #	Assigned Assistant's Name & Position	Assistant's Phone #
	None required			

**Management** – will provide adequate controls and equipment that, when used properly, will minimize or eliminate risk of injury to employees in the event of an emergency. Additionally Management will ensure proper adherence to this plan through regular review.

**Supervisors** - Supervisors shall follow and ensure that their employees are trained in the procedures outlined in this plan.

**Employees** - Employees are responsible for following the procedures described in this plan.

## **8.2 PLAN IMPLEMENTATION**

### **8.2.1 Reporting Fire and Emergency Situations**

All fires and emergency situations will be reported as soon as possible; verbally during normal work hours; or by telephone if after normal work hours or on weekends to the following:

Piers –Supervisor/s

Admin Office – CFO

Shop – Director of Equipment & Maintenance Department

To eliminate confusion and the possibility of false alarms, only the personnel listed above are authorized to contact the appropriate community emergency response personnel. The telephone numbers and contact information for the emergency response personnel are:

FIRE DEPARTMENT: 911

PARAMEDICS: 911

AMBULANCE: 911

POLICE: 911

MCCABE, HAMILTON & RENNY SHOP (808)479-0356

CIVIL DEFENSE AGENCY :( 808)723-8960

FEDERAL PROTECTIVE SERVICE: (808)356-4100

SECURITY (If applicable): (808)347-8348

ALOHA TOWER 24/7 (808)587-2076

Under no circumstances shall an employee attempt to fight a fire nor shall any employee attempt to enter a burning building to conduct search and rescue. These actions shall be left to emergency services professionals who have the necessary training, equipment, and experience (such as the fire department or emergency medical professionals). Untrained individuals may endanger themselves and/or those they are trying to rescue.

### **Informing McCabe, Hamilton, & Renny Employees of Fires and Emergency Situations**

In the event of a fire or emergency situation in the Admin Office or the Shop the Responsible Persons as listed above shall ensure that all employees are notified of the emergency, and shall provide special instructions to all employees by whatever means are available.

In the event of a fire or emergency situation on the pier or other worksite the Responsible Person shall ensure that all employees are notified as soon as possible and provide any special instructions to all employees by whatever means are available.

If a fire or emergency situation occurs after normal business hours, the Dispatchers shall contact all employees not on shift of future work status, depending on the nature of the situation.

Corporate Notification – the Responsible Person shall contact the President as soon as possible with information on employee injuries and/or loss of life, property damages, theft, or cargo losses.

**8.2.3 Emergency Contact Information** - A list of all employees' personal emergency contact information and shall be maintained on the company web for easy access in the event of an emergency.

### **Evacuation Routes**

Emergency evacuation escape route plans will be posted in Designated Areas (including Piers). In the event that a fire/emergency alarm is sounded or instructions for evacuation are given by Responsible Person, all employees shall immediately exit the building(s) at the nearest exits as shown in the escape route plans, and shall meet as soon as possible at the Designated Assembly Area. Employees with offices shall close the doors (unlocked) as they exit the area.

- Attachment N Admin Office Evacuation Plan
- Attachment O Shop Evacuation Plan
- Attachment P Piers 1 & 2 Evacuation Plan
- Attachment Q Piers 10 & 11 Evacuation Plan
- Attachment R Pier 29 Evacuation Plan
- Attachment S Piers 5, 6, & 7 Kalaeloa, Barbers Point
- Attachment T Piers 1, 2, & 3 Nawiliwili Harbor
- Attachment U Piers 1, 1C, & 3 Kahului Harbor

Mobility impaired employees and their assigned assistants if required will gather at the Designated Area within the building to ensure safe evacuation in the pre-determined fashion.

**8.2.5 Advanced Medical Care** - Under no circumstances shall an employee provide advanced medical care or treatment. These situations shall be left to emergency services professionals, who have the necessary training, equipment, and experience. Untrained individuals may endanger themselves and/or those they are trying to assist.

**8.2.6 Accounting for Employees/Visitors After Evacuation** - Once an evacuation has occurred, Responsible Person(s) shall account for each employee/visitor assigned to them at the Designated Assembly Area. Each employee is responsible for reporting to the appropriate Responsible Person(s) so an accurate head count can be made. All employee counts shall then be reported to the Safety Manager as soon as possible.

**8.2.7 Re-entry** - Once the building has been evacuated, no one shall re-enter the building for any reason, except for designated and properly trained rescue personnel. Untrained individuals may endanger themselves and/or those they are trying to rescue.

All employees shall remain at the Designated Assembly Area until the fire department or other emergency response agency notifies Responsible Person that either:

- the building is safe for re-entry, in which case personnel shall return to their workstations; or

- the building/assembly area is not safe, in which case personnel shall be instructed by Responsible Person on how/when to vacate the premises

## **Sheltering in Place**

In the event that chemical, biological, or radiological contaminants are released into the environment in such quantity and/or proximity, authorities and/or Responsible Person(s) may determine that it is safer to remain indoors rather than to evacuate employees. The Safety Manager shall announce Shelter in Place status by immediate notification available at worksite.

Responsible Person(s) shall immediately close the business or stop all work. If there are customers, clients, or visitors in the building, they shall be advised to stay in the building for their safety.

Unless there is an imminent threat, employees, customers, clients, and visitors shall call their emergency contacts to let them know where they are and that they are safe.

Responsible Person(s) shall turn on call-forwarding or alternative telephone answering systems or services. The recording for voice mail or automated attendant shall be changed to indicate that the business is closed, and that staff and visitors will be remaining in the building until authorities advise that it is safe to leave.

Responsible Person(s) shall quickly lock exterior doors and close windows, air vents, and fireplace dampers. Responsible Person(s) familiar with the building's mechanical systems shall turn off, seal, or disable all fans, heating and air conditioning systems, and clothes dryers, especially those systems that automatically provide for exchange of inside air with outside air. If there is a danger of explosion, Responsible Person(s) shall close the window shades, blinds, or curtains.

Responsible Person(s) shall gather essential disaster supplies (i.e., nonperishable food, bottled water, battery-powered radios, first-aid supplies, flashlights, batteries, duct tape, plastic sheeting, and plastic garbage bags), which are stored in the storage room, and shall take them to the Shelter in Place Location(s) within the building as designated by the State of Hawaii.

All employees, customers, and visitors shall move immediately to the Shelter in Place Location within the building. Responsible Person(s) shall seal all windows, doors, and vents with plastic sheeting and duct tape.

Responsible Person shall write down the names of everyone in the room, and call the designated emergency contact outside of the building to report who is in the room, and their affiliations with Company Name (employee, visitor, client, and customer).

Responsible Person(s) shall monitor telephone, radio, television and Internet reports for further instructions from authorities to determine when it is safe to leave the building.

**8.2.9 Severe Weather and other Natural Disasters action plans are provided in separate Company policies and procedures.**

## 8.3 EMERGENCY ACTION PLAN TRAINING

### Employee Training

All employees shall receive instruction on this Emergency Action Plan as part of New Employee Orientation upon hire. Additional training shall be provided:

- when there are changes to the plan and/or facility
- when an employee's responsibilities change
- annually as refresher training

Items to be reviewed during the training include:

- proper housekeeping
- fire prevention practices
- fire extinguisher locations, usage, and limitations
- threats, hazards, and protective actions
- means of reporting fires and other emergencies
- names of Emergency Action Plan Manager and Coordinators
- individual responsibilities
- alarm systems
- escape routes and procedures
- emergency shut-down procedures
- procedures for accounting for employees and visitors
- closing doors
- sheltering in place

**Fire/Evacuation Drills** - Fire/Evacuation drills shall be conducted at least annually, and shall be conducted in coordination with local police and fire departments. Additional drills shall be conducted if physical properties of the business change, processes change, or as otherwise deemed necessary.

**Training Records** – Training and Employee Development Director shall document and maintain records of all training pertaining to this plan.

## 8.4 PLAN EVALUATION

The Training and Employee Development Director shall evaluate all drills for effectiveness and weaknesses following each fire drill or as needed if changes to the worksite are made, by. The Executive Safety Steering Committee shall review all Emergency Action Plan evaluations, and shall implement changes to improve it.

## 9.0 OTHER RELATED SERVICES

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### 9.1 DISABILITY MANAGEMENT

McCabe, Hamilton, and Renny is committed to providing early and safe transition back to work programs and services to all its employees who are absent from their workplace because of occupational or non-occupational illness or injury. It will actively seek to establish and maintain partnerships with employees, unions, health care providers, and the Workers Compensation Insurance Company to ensure the success of these programs at each workplace.

When an employee has not fully recovered from an injury/illness but is able to return to work in some limited capacity, the Company will make every reasonable effort to find suitable assignments for that employee. The Company recognizes the mutual benefits for both the employee and the employer in sponsoring early and safe return-to-work programs.

Individual transition back to work plans will be developed through consultation with all the relevant partners. Each plan will positively focus on the individual's capabilities and be sufficiently flexible to accommodate the employee's changing condition towards optimal recovery. The shared goal of the early and safe transition back to work programs is to have employees re-gain their pre-injury vocational status and economic benefits as quickly as possible.

There are basically two different options for transition back to work.

**Ease back to Work** – Ease back is a temporary program in which fewer hours of work per shift are arranged so that a worker can gradually regain sufficient tolerance and strength to perform the original job duties for the full shift. For example, a worker recovering from an injury may be able to work initially four hours per shift, and after a few weeks, manage six hours per shift, and eventually the full shift.

**Trial Work** - A trial work period is an opportunity for the worker, the Company, and the health care provider to see if an injured worker can safely perform all the duties of his/her job or some other job.

### 9.2 EMPLOYEE ASSISTANCE of the PACIFIC PROGRAM

McCabe, Hamilton, and Renny recognize that personal problems can interfere with an employee's work and peace of mind. From time to time, each of us can use some assistance coping with life's problems. The purpose Employee Assistance of the Pacific Program is to provide any employees an opportunity to obtain help for personal problems that are either affecting, or have the potential to affect, work performance. Problems may be marital, family, financial, emotional or those associated with substance abuse, or gambling.

Recognizing that a problem exists, an employee may seek assistance on their own initiative by making an appointment at 808-597-8222 or toll free 877-597-8222. If work performance has deteriorated, the supervisor may make the referral on behalf of the employee, if the employee agrees to participate. Confidentiality is protected. This program provides the following services:

- Confidential assistance for personal difficulties
- Crisis debriefing & grief counseling for individuals & groups
- Help with workplace interpersonal conflicts
- Workshops on the EAP process, stress management & managing change
- Wellness promotion seminars

- Depression and anxiety
- Concerns regarding children and adolescents
- Elder care issues
- Substance abuse (alcohol and other drugs)
- Financial or legal referrals
- Other personal concerns.

### 9.3 RESPECTFUL WORKPLACE PROGRAM

This program provides an effective way to resolve conflicts without resorting to formal measures. Responsibility for resolving the conflict is placed primarily with the individuals involved. Without a Respectful Workplace process, conflicts too often escalate over time and become more difficult to resolve. Although all employees have a right to address workplace conflicts in a manner which promotes resolution, employees must access this program willingly. Under some circumstances disciplinary action within the collective agreement framework will be the appropriate response to an incident of misconduct. The services provided under the respectful Work Program include:

**Coaching & Consultations** - This service provides managers and employees with confidential advice and support on how to constructively respond to situations of conflict and / or explore available avenues of recourse.

**Mediation** - This service is conducted by a trained and impartial mediator who assists two or more parties to reach a resolution to their differences in a respectful manner. This requires initial separate meetings between the mediator and each of the parties involved, prior to the scheduling of the mediation.

**Facilitations** - Work groups can access impartial facilitation services for meetings and other problem solving sessions which might benefit from such a support. The focus of such sessions is on building interpersonal relationships rather than resolving labor relations disputes.

**Training** - Work groups can receive a range of training services which can include short presentations, awareness sessions, team building workshops and skills training.



## MHR HAZARD REPORT FORM Attachment A

### Hazard Classification:

- **Almost Certain:** likely to occur immediately or within a short period of time when exposed to the hazard
- **Likely:** will occur in time, eventually
- **Possible:** possible to occur in time; could occur at some point
- **Unlikely:** unlikely to occur
- **Rare:** very unlikely

**Description of Hazard:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Risk the Hazard Presents** (to people, property, etc.): \_\_\_\_\_

\_\_\_\_\_

**Location** (be specific as possible): \_\_\_\_\_

\_\_\_\_\_

**Action Needed** (please note if intermediate steps were taken to alleviate the hazard): \_\_\_\_\_

\_\_\_\_\_

**Other Comments** (continue on back if necessary): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Immediate Corrective Action** (describe who will correct the situation, what will be done & when): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Follow Up:** \_\_\_\_\_

\_\_\_\_\_

**Reported By:** \_\_\_\_\_

**Date:** \_\_\_\_\_





## EMPLOYEE SAFETY SUGGESTION FORM Attachment B

It is McCabe, Hamilton, & Renny's policy to maintain open communication between management and staff on matters pertaining to safety. Your thoughts regarding safety are considered important and we encourage your active participation in our company safety program. Please feel free to express any of your safety concerns or suggestions during safety meetings, individually to your supervisor, or in writing on this Safety Suggestion Form. Using this form will allow you to remain anonymous if you so desire; however, this will make it difficult to provide you special recognition if your suggestion is put to action. Be assured that all safety suggestions will be given serious consideration and that each will receive a response.

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This form can be used by employees who wish to provide a safety suggestion, or report an unsafe workplace condition or practice.

Description of Unsafe Condition or Practice:

Causes or Other Contributing Factors:

Employee's Suggestion for Improving Safety:

Has This Matter Been Reported to the Area Supervisor? Yes or No (circle one)

Name: \_\_\_\_\_ Bango: \_\_\_\_\_ Date: \_\_\_\_\_

**Employees are advised that the use of this form or other reports of unsafe conditions or practices are protected by law. It would be illegal for the MHR to take any action against an employee in reprisal for exercising rights to participate in communications involving safety.**

The employer will investigate and advise the employee who provided the information or the workers in the area of the employer's response.

## Accident/Incident Report and Investigation Form Attachment C

**Instructions:** Complete this form as soon as possible after an incident that results in serious injury or illness as well as to investigate a minor injury or near miss that *could have resulted in a serious injury or illness*.

This is a report of a: Death\_\_\_ Lost Time\_\_\_ Dr. Visit Only\_\_\_ First Aid Only\_\_\_ Near Miss \_\_\_  
Date/Time of incident: \_\_\_\_\_ Report made by: Employee\_\_\_ Supervisor\_\_\_

### **Step 1:** Injured employee (Complete this part for each injured employee).

Name: \_\_\_\_\_ Bango: \_\_\_\_\_

Telephone #: \_\_\_\_\_ Sex: Male\_\_\_ Female\_\_\_ Date of Birth: \_\_\_\_\_

Address: \_\_\_\_\_

Employee is: Full Time\_\_\_ Part Time\_\_\_ Clerk\_\_\_

Department: \_\_\_\_\_ Job Title/Position at time of incident: \_\_\_\_\_

Nature of Injury: Abrasion/Scrapes\_\_\_ Amputation\_\_\_ Broken Bone\_\_\_ Bruise\_\_\_ Burn (Heat)\_\_\_  
Burn (Chemical)\_\_\_ Concussion to head\_\_\_ Crushing Injury\_\_\_ Cut, Laceration, Puncture\_\_\_  
Hernia\_\_\_ Illness\_\_\_ Sprain/strain\_\_\_ Damage to a body system\_\_\_

Explain, if necessary: \_\_\_\_\_  
\_\_\_\_\_

Did Employee stop working immediately: Yes\_\_\_ No\_\_\_

Date/Hour Returned to Work: \_\_\_\_\_ Did injury cause loss of 1 or more shifts: \_\_\_\_\_

Date and Time pay stopped: \_\_\_\_\_

### **Step 2:** Describe the Incident

Exact location of the incident: \_\_\_\_\_

Exact Time: \_\_\_\_\_

What part of the employee's workday? Starting/Ending Shift\_\_\_ Normal Work Activities\_\_\_

During Meal Period\_\_\_ During Break\_\_\_ Working Overtime\_\_\_

Names & Phone numbers of witnesses (if any):

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Witness statements attached: \_\_\_ Photographs attached: \_\_\_ Drawings attached: \_\_\_

What Personal Protective Equipment was being used (if any)?

Hardhat \_\_\_ Gloves \_\_\_ Reflective Vest \_\_\_ Ear Plugs \_\_\_ Safety Glasses \_\_\_ Steel Toed Shoe \_\_\_  
Other (Explain) \_\_\_

Describe, step-by-step the events that led up to the injury. Include names of any machines, parts, objects, tools, materials and other important details:

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Description continued on attached sheets: \_\_\_\_\_

**Step 3: Why did the Incident happen? (Check all that apply)**

Unsafe workplace conditions:

- inadequate guard
- unguarded hazard
- safety device is defective
- tools or equipment defective
- workstation layout is hazardous
- unsafe lighting
- unsafe ventilation
- lack of needed PPE
- lack of appropriate equipment/tools
- unsafe clothing
- no or insufficient training
- other

Unsafe acts by people:

- operating without permission
- operating at unsafe speed
- servicing equipment that has power
- making a safety device inoperative
- using defective equipment
- equipment used in an unapproved way
- unsafe lifting
- taking an unsafe position or posture
- distraction, teasing, horseplay
- failure to wear PPE
- failure to use available equipment/tools
- other

Why did the unsafe conditions exist? \_\_\_\_\_

It is a pre-existing condition on the pier? \_\_\_\_\_

Why did the unsafe acts occur? \_\_\_\_\_

Was there a reward (i.e. "the job can be done more quickly" or "the product is less likely to be damaged") that may have encouraged the unsafe conditions or acts? Yes \_\_\_ No \_\_\_

If yes, describe: \_\_\_\_\_

Were the unsafe acts or conditions reported prior to the incident? Yes \_\_\_ No \_\_\_

Have there been similar incidents or near misses prior to this one? Yes \_\_\_ No \_\_\_ (Not in the same location)

**Step 4: How can future incidents be prevented?**

Stop this activity \_\_\_ Guard the Hazard \_\_\_ Train the employee(s) \_\_\_ Train the Supervisor(s) \_\_\_

Redesign task steps \_\_\_ Redesign work station \_\_\_ Write a new policy/rule \_\_\_

Enforce existing policy \_\_\_ Routinely inspect for the hazard \_\_\_ Personal Protective Equipment \_\_\_

Other: \_\_\_\_\_

What should be (or has been) done to carry out the suggestions(s) checked above?

\_\_\_\_\_  
\_\_\_\_\_

Description continued on attached sheets: \_\_\_\_\_

**Step 5: Who completed and reviewed this form?**

Written by: \_\_\_\_\_ Title: \_\_\_\_\_

Department: \_\_\_\_\_ Date: \_\_\_\_\_

Names of investigation team members:

\_\_\_\_\_  
\_\_\_\_\_

Reviewed by Department Director: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed by Corporate Safety Director: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed by President/General Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed by Executive Safety Steering Committee: \_\_\_\_\_ Date: \_\_\_\_\_



## LOCK OUT/TAG OUT PROCEDURES Attachment D

**Purpose:** This establishes McCabe, Hamilton, & Renny's procedures for protecting employees who operate, service or performs maintenance on the company's machines and/or equipment and who could be injured by using defective equipment, unexpected start-up or release of hazardous energy.

Service or maintenance includes erecting, installing, constructing, repairing, adjusting, inspecting, unjamming, setting up, trouble-shooting, testing, cleaning, and dismantling machines, equipment or processes.

This policy will prevent use of machinery or equipment that is not safe to operate and is properly locked or tagged out until repairs have been completed.

**Scope:** This policy applies to all McCabe, Hamilton, & Renny's employees who may be exposed to hazardous energy during service or maintenance work. Uncontrolled energy includes potential, kinetic, flammable, chemical, electrical, and thermal sources.

### **Employer and employee responsibilities:**

- McCabe, Hamilton & Renny is responsible for implementing and enforcing this policy.
- All employees must comply with this policy.
- Supervisors must enforce the use of lockout and tagout devices when machines and/or equipment is found to be unsafe to operate as well as when employees do service or maintenance work and may be exposed to hazardous energy.
- Employees who do service and maintenance work must follow the lockout/tagout procedures described in this policy.
- Employees who work in areas where lockout/tagout procedures are used must understand the purpose of the procedures and are prohibited from attempting to restart machines or equipment that are locked or tagged out.

**Lockout and tagout devices** shall meet the following criteria to ensure that they are effective and not removed inadvertently:

- Lockout devices must work under the environmental conditions in which they are used. Tagout device warnings must remain legible even when they are used in wet, damp, or corrosive conditions.
- Lockout and tagout devices must be designated by color, shape, or size. Tagout devices must have a standardized print and warning format.
- Lockout devices and tagout devices must be strong enough that they can't be removed inadvertently. Tagout devices must be attached with a single-use, self-locking material such as a nylon cable tie.

- Any employee who sees a lockout or tagout device must be able to recognize who attached it and its purpose.
- Each lock must have a unique key or combination.

Energy-isolating devices are the primary means for protecting **McCabe, Hamilton, & Renny's** employees who service equipment and must be designed to accept a lockout device. Energy isolating devices must clearly identify function.

### **Electrical energy sources**

Lockout or tagout of electrical energy sources must occur at the circuit disconnect switch. Electrical control circuitry does not effectively isolate hazardous energy. See also, **Alternative methods**.

### **Exposure survey**

The Director Equipment and Maintenance Department will conduct a hazardous-energy survey to determine affected machines and equipment, types and magnitude of energy, and necessary service and maintenance tasks. Each task will be evaluated to determine if it must be accomplished with lockout or tagout procedures.

### **Energy control procedures**

Authorized employees who lockout or tagout equipment or do service and maintenance must follow specific written energy-control procedures. The procedures must include the following information:

- The intended use of the procedure
- Steps for shutting down, isolating, blocking, and securing equipment
- Steps for placing, removing, and transferring lockout devices
- Equipment-testing requirements to verify the effectiveness of the energy-control procedures

When re-energizing equipment is necessary — when power is needed to test or position the equipment, for example — temporary removal of lockout or tagout devices is allowed. This applies only for the time required to perform the task and the procedure must be documented.

### **Employees must do the following before they begin service or maintenance work:**

1. Inform all affected employees of equipment shutdown.
2. Shut down equipment.
3. Isolate or block hazardous energy.
4. Remove any potential (stored) energy.
5. Lockout or tagout the energy sources.
6. Verify the equipment is isolated from hazardous energy and de-energized.

**Employees must do the following before they remove lockout or tagout devices and re-energize equipment:**

1. Remove tools and replace machine or equipment components.
2. Inform coworkers about energy-control device removal.
3. Ensure all workers are clear of the work area.
4. Verify machine or equipment power controls are off or in a neutral position.
5. Remove the lockout or tagout device.
6. Re-energize equipment.

**Special lockout/tagout situations**

**Energized testing:** When an energy-isolating device is locked or tagged and it is necessary to test or position equipment, do the following:

1. Remove unnecessary tools and materials.
2. Ensure that all other employees are out of the area.
3. Remove locks or tags from energy isolating devices.
4. Proceed with test.
5. Reenergize equipment and lockout or tagout energy-isolating devices.
6. Operate equipment controls to verify that the equipment is de-energized.

**Shift changes and long-term shutdowns**

Employees must follow McCabe, Hamilton, & Renny’s specific written procedures when it is necessary to continue lockout/tagout when work shifts change and during long-term shutdowns. Director Equipment and Maintenance Department is responsible for monitoring lockout and tagout devices that control the energy to equipment during long-term shutdowns

**Alternative methods**

When lockout or tagout is *not* used for tasks that are routine, repetitive, and integral to the production process, or prohibits the completion of those tasks, then an alternative method must be used to control hazardous energy.

Selection of an alternative control method must be based on a risk assessment of the machine, equipment, or process. The risk assessment must consider existing safeguards provided with the machine, equipment or process that may need to be removed or modified to perform a given task.

For example, when control circuits are used as part of the safeguarding system, the system must be designed to ensure protection as effective as a mechanical disconnect switch or master shut-off valve. A control-reliable dual channel hardwired circuit of industrially-rated components that satisfies the design features as specified in ANSI B11.19, with a safety relay or safety PLC to ensure integrity and performance of the safeguarding system, must be used.

Under all circumstances, the individual must have exclusive personal control over the means to maintain the state of the control circuit in a protective mode.

## Training

Employees who may be exposed to hazardous energy will receive training before assignment to ensure that they understand **McCabe, Hamilton, & Renny's** energy-control policy and have skills to apply, use, and remove energy controls. The training will include the requirements of 1910.147 and the following:

- Affected employees will be trained in the purpose and use of energy-control procedures. *An affected employee uses equipment that is being serviced under lockout or tagout procedures or works in an area where equipment is being serviced.*
- Authorized employees will be trained to recognize hazardous energy sources, the type and magnitude of energy in the workplace, the methods and means necessary for isolating and controlling energy, and the means to verify that the energy is controlled. *An authorized employee locks out or tags out equipment to do service work. An affected employee becomes an authorized employee when that employee's duties include service or maintenance work on equipment.*
- Employees whose jobs are in areas where energy-control procedures are used will be trained about the procedures and the prohibition against starting machines that are locked or tagged out.
- Employees will be retrained annually to ensure they understand energy-control policy and procedures.
- Authorized and affected employees will be retrained whenever their job assignments change, energy-control procedures change, equipment or work processes present new hazards, or when they don't follow energy-control procedures.

Current training records will be maintained for each authorized and affected employee including the employee's name and the training date.

## Inspections of written energy-control procedures

McCabe, Hamilton, & Renny's will perform and document annual inspections of energy-control procedures to ensure that employees understand and use them effectively. Documentation will include the following:

- equipment on which the procedure is used
- date of the inspection
- employees included in the inspection
- inspector's name

If an inspector finds that employees are not following an energy-control procedure or that the procedure is not protecting them, employees must be retrained and the procedure's deficiencies corrected.

The inspector must understand the procedure and must be someone other than those following the procedure at the time of the inspection. Each procedure's accuracy, completeness, and effectiveness must be verified.

If the inspection covers a procedure for equipment with an energy-isolating device that can be *locked out*, the inspector must review the procedure with the employees who use it to service the equipment. The inspector can review the procedure with the employees individually or in a group.



If the inspection covers a procedure for equipment with an energy-isolating device that can only be *tagged out*, the inspector must review the procedure with the authorized employees who service the equipment and with affected employees who may work in the area when the equipment is serviced. The inspector can review the procedure with the employees individually or in a group.

# REFRESHER TRAINING AND EVALUATION

## Attachment E

Purpose: To develop and implement a Refresher Training program when an operator demonstrates a deficiency in the safe operation of the truck.

Scope: Refresher training, including an evaluation of the effectiveness of that training, shall be conducted to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely. Refresher training in relevant topics shall be provided to the operator when:

- When an operator has been absent from work 120 consecutive days or more, or 240 days out of one calendar year. Includes Foreman and Crane Operators.
- When operator reaches or exceeds a total amount of \$8000 of damage in a rolling 90-day period. Damages that fall under this policy will include damages documented from August 1, 2015. All damages will be investigated in order to positively identify an operator who operated machinery unsafely and directly caused an incident.
- When the operator has been observed to operate the vehicle in an unsafe manner.
- The operator has been involved in an accident or near-miss incident. Near-miss and unsafe operating incidents which are determined to result in a "Medium," "High," or "Unacceptable" level using the Hazard Risk Assessment Matrix contained in the MHR Occupational Health & Safety Manual.

Note: Risk Assessments will be completed by the Supervisor assigned or the Safety Manager.

- The operator is assigned to drive a different type of truck.  
A condition in the workplace changes in a manner that could affect safe operation of the truck.
- Each operator's performance must be evaluated at least once every three years.

Action: For the first incident training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), and a review of their incident. As well as a practical exercise with a trainer for a minimum of 5 hours. Upon satisfactory completion of re-training, the operator will be re-assigned to their respective skilled jobs.

Additional incidents will require retraining that shall include all requirements established above as well as a minimum of 8 hours of demonstrations performed by the trainer and practical exercises performed by the trainee.

Repeated incidents of the same nature will result in a proposal to remove the MO title from the Operator.

## HAZARD ASSESSMENT FORM

### Attachment H

Types of Work List all types of work done at the work site.	Work Related Activities List all work related activities for each type of work.	Hazards List the hazards for each work related activity. List both health and safety hazards.	Risk (1-4)				Rank (Priority)	Controls List the proposed control(s) for each hazard.	Completion Date List the date the controls will be in place.
			Consequences	Frequency	Probability	Total			

# ADMINISTRATION OFFICE INSPECTION CHECKLIST

## Attachment I

Inspector(s): \_\_\_\_\_  
 \_\_\_\_\_

Date: \_\_\_\_\_

This checklist provides guidance only; it is not intended as a definitive list for the identification of all hazards. The inspection team is encouraged to make modifications to suit the specific environment. Note: There may be hazards/deficiencies not mentioned on this checklist that will need to be identified.

**\*\*See President/General Manager for instructions on the appropriate corrective action and department/person responsible.**

			Corrective Action	
EMPLOYER POSTING	YES	NO	Department/Person Responsible	Date Completed
Is there required OSHA poster displayed in the breakroom?				
Are emergency telephone numbers and evacuation route posted in the breakroom and by the exit door?				
Is the Summary of Work-Related Injuries and Illnesses (OSHA Form 300A) posted during the months of February, March, and April?				

			Corrective Action	
FIRST AID	YES	NO	Department/Person Responsible	Date Completed
Are fully supplied first aid kits easily accessible?				
Are the first aid kits replenished? (Check for expired supplies and low stock)				

			Corrective Action	
FIRE PROTECTION	YES	NO	Department/Person Responsible	Date Completed
Are fire exit doors in good operating condition?				
Are fire exit doors unobstructed and protected against obstruction?				
Is proper clearance maintained below sprinkler heads?				
Are portable fire extinguishers mounted in readily accessible locations?				
Are fire extinguishers recharged regularly with it noted on the inspection tag?				
Are employees periodically instructed in the use of fire extinguishers and fire protection procedures?				

			Corrective Action	
GENERAL WORK ENVIRONMENT	YES	NO	Department/Person Responsible	Date Completed
Are all work areas clean, sanitary, and orderly?				
Are work surfaces kept dry and appropriate means taken to assure the surfaces are slip-resistant?				
Are the toilets and washing facilities provided and maintained in a clean and sanitary fashion?				
Are all work areas adequately illuminated?				

			Corrective Action	
WALKWAYS	YES	NO	Department/Person Responsible	Date Completed
Are aisles and passageways kept clear?				
Are possible wet surfaces covered with non-slip materials/mat?				
Are holes/disturbances in the floor, sidewalk, or other walking surface repaired properly, covered, or otherwise made safe?				
Are materials or equipment stored in such a way that sharp projections will not interfere with the walkway?				
Are spilled materials cleaned up immediately?				

			Corrective Action	
FLOOR AND WALL OPENINGS	YES	NO	Department/Person Responsible	Date Completed
Are floor openings guarded by a cover, a guardrail, or equivalent on all sides (except at stairways or ladder entrances)?				
Is the glass in windows, doors, glass walls, etc., not subject to possible human impact, of sufficient thickness and type for the condition of use?				

			Corrective Action	
EXITING	YES	NO	Department/Person Responsible	Date Completed
Are all exits marked with an exit sign and illuminated by a reliable light source?				
Are exit signs labeled with the word "EXIT" in lettering at least 5 inches high and the stroke of the lettering at least 1/2 inch wide?				
Are all exits kept free of obstructions?				
Are doors that are required to serve as exits designed and constructed so that the path of exit travel is obvious and direct?				
Are exit doors able to be opened from the direction of exit travel without the use of a key or any special knowledge or effort when the building is occupied?				

PORTABLE LADDERS	YES	NO	Corrective Action	
			Department/Person Responsible	Date Completed
Are all ladders maintained in good condition, joints between steps and side rails tight, all hardware and fittings securely attached, and moveable parts operating freely without binding or undue play?				
Are non-slip safety feet provided on each metal or rung ladder, and are ladder rungs and steps free of grease and oil?				
Are employees prohibited from placing a ladder in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded?				
Are employees prohibited from placing ladders on boxes, barrels, or other unstable bases to obtain additional height?				
Are employees instructed not to use the top step of ordinary stepladders as a step?				
Are portable metal ladders legibly marked with signs reading "CAUTION - Do Not Use Around Electrical Equipment" or equivalent wording?				

ENVIRONMENTAL CONTROLS	YES	NO	Corrective Action	
			Department/Person Responsible	Date Completed
Are employees instructed in proper first aid and other emergency procedures?				
Is the work area ventilation system appropriate for the work performed?				
Is PPE provided, used and maintained wherever required? (gloves for changing toner)				
Is all water provided for drinking, washing, and cooking potable (clean)?				
Are employees instructed in the proper manner for lifting heavy objects?				
Where heat is a problem, have all fixed work areas been provided with spot cooling or air conditioning?				

ELECTRICAL	YES	NO	Corrective Action	
			Department/Person Responsible	Date Completed
Are exposed wiring and cords with frayed or deteriorated insulation repaired or replaced promptly?				
Are all cord, cable, and raceway connections intact and secure?				
Are all disconnecting switches and circuit breakers labeled to indicate their use or equipment served?				
Is sufficient access and working space provided and maintained around all electrical equipment to permit ready and safe operations and maintenance?				
Are electrical enclosures such as switches, receptables, junction boxes, etc., provided with tight-fitting covers or plates?				

COMMENTS:

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REVIEWED BY:

\_\_\_\_\_

Safety Manager

\_\_\_\_\_

Date

\_\_\_\_\_

President/General Manager

\_\_\_\_\_

Date

## SHOP SAFETY INSPECTION CHECKLIST Attachment J

Inspector(s): \_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_

This checklist provides guidance only; it is not intended as a definitive list for the identification of all hazards. The inspection team is encouraged to make modifications to suit the specific environment. Note: There may be hazards/deficiencies not mentioned on this checklist that will need to be identified.

**\*\*See President/General Manager for instructions on the appropriate corrective action and department/person responsible.**

GENERAL WORK ENVIRONMENT	Y	N	Corrective Action	
			Department/Person Responsible	Date Comp.
Are emergency phone numbers posted near a phone?				
Do employees know where to gather in case of an evacuation?				
Do employees know where and how receive care for an injury?				
Are signs present for emergency safety equipment (eyewash, exits etc.)?				
Are emergency evacuation drills regularly conducted?				
Are all exits and paths free of obstruction?				
Are first aid kits fully stocked and inspected monthly?				
Are fire extinguishers present and inspected within the past year?				
Are oily rags kept in a metal bin and removed from the shop daily?				
Are flammable materials in excess of 10 gallons stored in appropriate containers and storage cabinets?				
Have all employees received general safety training, personal protective equipment (PPE), fire and back safety, etc.?				
Have all employees been trained on the equipment that they operate?				



			<b>Corrective Action</b>	
<b>Are all employees current on specialized training:</b>	<b>Y</b>	<b>N</b>	<b>Department/Person Responsible</b>	<b>Date Comp.</b>
<input type="checkbox"/> Ladders				
<input type="checkbox"/> Fall Protection				
<input type="checkbox"/> First Aid				
<input type="checkbox"/> Lockout/Tagout				
<input type="checkbox"/> Respirators				
<input type="checkbox"/> Injury and Illness Prevention				
<input type="checkbox"/> MSDS				
Are all safety trainings documented and filed?				
Are regularly scheduled safety meetings conducted in the shop?				
Are safety meeting minutes posted and implemented?				
Do all employees have access to the shop safety guide?				
Is PPE provided and used whenever necessary?				
<b>ENVIRONMENTAL CONTROLS</b>	<b>Y</b>	<b>N</b>	<b>Department/Person Responsible</b>	<b>Date Comp.</b>
Are filters changed routinely?				
Are all worksites clean and orderly?				
Are waste containers kept clean and emptied daily?				
Is food kept in the designated area at all times?				
Are all cabinets and shelves secured or anchored?				
Are all machines secured or anchored?				
Are floors in good condition and kept dry?				
Are all light fixtures adequate and functioning properly?				
Is the ventilation system adequate for the work being performed?				
Are filters changed routinely?				

<b>ELECTRICAL</b>	<b>Y</b>	<b>N</b>	<b>Corrective Action</b>	
			<b>Department/Person Responsible</b>	<b>Date Comp.</b>
Are all plugs, cords, and panels enclosed, free from splices with insulation in good condition?				
Do all extension cords have grounding conductors?				
Are extension cords used only temporarily?				
Do cords secured so they do not run across pathways, under doors or the walls?				
Is the breaker panel accessible with labels identifying the function of each switch?				
Are ground fault circuit interrupters available for use in wet areas?				
Are hand-tools effectively grounded or an approved double insulated type?				
<b>Tools &amp; Equipment</b>	<b>Y</b>	<b>N</b>	<b>Department/Person Responsible</b>	<b>Date Comp.</b>
Is defective equipment promptly reported, labeled, and repaired?				
Do all machines have guards to protect against points of operation, nip points, rotating parts, moving parts, flying chips, sparks, etc.?				
Are start, stop, emergency and other operating controls within the operator's reach?				
Are written standard operating procedures (SOPs) for each machine available and executed by all employees?				
Are machines regularly cleaned and maintained?				
Are maintenance records, calibrations, certifications of each machine kept on file?				
Do only authorized employees perform repairs?				
Are all electrical hand tools in good operating condition?				
Are tools free from cracks and broken parts?				
Are ladders free from dents, splinters, grease, dirt etc.?				
Do the spreaders lock in place?				
Are all safety feet on the ladder in good condition?				
Are only approved welding equipment used?				
Are all welding equipment properly insulated?				

			Corrective Action	
	Y	N	Department/Person Responsible	Date Comp.
Are fuel gas hoses red, oxygen green and inert gas black?				
Are cylinders legibly marked?				
Are cylinders and hoses free from cracks or dents?				
Are cylinders secured upright with a double chain and valve protector caps?				
Are materials stored to prevent falls and spills?				
Do signs designate storage areas?				
Are all storage containers labeled with their contents?				
Are storage racks free from sagging?				
Are employees taught how to stock and unstock shelves safely?				
Are combustibles and chemicals kept in closed containers when not in use?				
Do workers use the appropriate PPE when handling materials?				

COMMENTS:

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REVIEWED BY:

\_\_\_\_\_  
Safety Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
President/General Manager

\_\_\_\_\_  
Date

# PIER INSPECTION CHECKLIST

## Attachment K

Inspector(s): \_\_\_\_\_  
 \_\_\_\_\_

Date: \_\_\_\_\_

This checklist provides guidance only; it is not intended as a definitive list for the identification of all hazards. The inspection team is encouraged to make modifications to suit the specific environment. Note: There may be hazards/deficiencies not mentioned on this checklist that will need to be identified.

**\*\*See President/General Manager for instructions on the appropriate corrective action and department/person responsible.**

GENERAL WORKING CONDITIONS	YES	NO	Corrective Action	
			Department/Person Responsible	Date Completed
Are active work areas free of equipment and materials not in use?				
Is the work area clear of debris, projecting nails, strapping, and other sharp objects?				
Are hatch beams, covers, and pontoons stowed in stable piles with beams secured against tipping or falling?				
Does cargo and material obstruct access to vessels, cranes, vehicles, or buildings?				
Are access and egress within the pier sheds unobstructed?				
Are there any conditions causing slippery working and walking surfaces in immediate work areas?				
Is loose dunnage or debris hanging or protruding from loads removed?				
Are telephones or equivalent means of communication readily available?				
Are there vehicle curbs, bull rails, or other effective barriers at least six inches in height, provided at the waterside edges of aprons and bulkheads?				
Are ditches, pits, excavations, and surfaces in poor repair guarded by readily visible barricades, rails, or other equally effective means?				

SANITARY FACILITIES	YES	NO	Corrective Action	
			Department/Person Responsible	Date Completed
Are washing and toilet facilities accessible and sufficient for the sanitary requirements of employees?				
Do they have running water, including hot and cold or tepid water at a minimum of one accessible location?				
Is soap, clean individual sections of continuous toweling or warm air blowers, and are there fixed or portable toilets in separate compartments with latch-equipped				
Is there separate toilet facilities provided for male and female employees?				
Are they regularly cleaned and maintained in good order?				
Is potable drinking water accessible to employees at all times?				

CARGO HANDLING ENVIRONMENT	YES	NO	Corrective Action	
			Department/Person Responsible	Date Completed
Is a first aid kit available at the worksite and is at least one person holding a valid first aid certificate?				
Are first aid kits weatherproof and contain individual sealed packages for each item that must be kept sterile.				
Are the contents checked at intervals that allow prompt replacement of expended items?				
Is there at least one Stokes basket stretcher, or its equivalent, permanently equipped with bridles for each vessel being worked on the pier?				
Are the stretchers kept close to vessels and positioned to avoid damage?				
Is a blanket or other suitable covering available?				
Do the stretchers have at least four sets of effective patient restraints in operable condition?				
Are the lifting bridles of adequate strength, capable of lifting 1,000 pounds with a safety factor of five, maintained in operable condition?				
Is a U.S. Coast Guard approved 30-inch life ring, with at least 90 feet of line attached, available and readily accessible points at each waterside work area?				
Are the locations of first-aid facilities, telephones, and firefighting and emergency equipment as well as fire exits?				

FIRE PROTECTION	YES	NO	Corrective Action	
			Department Person Responsible	Date Completed
Is there an alarm system in place to provide warning for necessary emergency action and for the safe escape of employees from the workplace or the immediate work area?				
Are supervisors reviewing emergency action plans prior to the start of each shift?				
Is a written emergency action plan kept at the workplace and available for employee review?				
Are portable fire extinguishers mounted in readily accessible locations and mounted on Machines?				
Are fire extinguishers recharged regularly with it noted on the inspection tag?				
Are employees periodically instructed in the use of fire extinguishers and fire protection procedures? (who, when/how many times a year)				
Are open fires and fires in drums or similar containers prohibited?				

PORTABLE LADDERS	YES	NO	Corrective Action	
			Department Person Responsible	Date Completed
Are all ladders maintained in good condition, joints between steps and side rails tight, all hardware and fittings securely attached, and moveable parts operating freely without binding?				
Are non-slip safety feet provided on each metal or rung ladder, and are ladder rungs and steps free of grease and oil?				
Are employees prohibited from placing a ladder in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded?				
Are employees prohibited from placing ladders on boxes, barrels, or other unstable bases to obtain additional height?				

COMMENTS:

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REVIEWED BY:

\_\_\_\_\_ Safety Manager

\_\_\_\_\_ Date

\_\_\_\_\_ President/General Manager

\_\_\_\_\_ Date

## PRE-SHIFT INSPECTION CHECKLIST AND REPORT Attachment L

Superintendent:	Operation/Customer:	Date:
Pier:	Vessel:	Time:
		Job Number:

**Section I: Safety**

INDEX	DESCRIPTION	Yes	No	N/A
1	Operation safety brief conducted (Highlighting safety focus and safety hazards)			
2	Emergency communication available			
3	Gear/First aid boxes well stocked			
4	Tools and gear in safe working condition			
5	Access to all work areas available			
6	Lighting – available			
7	Trip/Fall hazards identified prior to operation			
8	Injuries reported prior to operation			
9	Machine Inspection from completed prior to shift			
10	Mechanical failures reported prior to shift			
11	Machine operators reminded to use seat belt and of speed limits			
12	PPE Requirement communicated and checked			
13	MHR Hazard Report Form submitted <b>(Note: Must be submitted when a hazard has been identified)</b>			

**Safety Brief:** *(Supervisor shall give a brief summary on the day's safety focus and what he/she may have done to insure the safety of the work force.)*

**Notes/Exceptions:**



## MHR EQUIPMENT PRE-USE INSPECTION FORM Attachment M

Status:

**✚ EQUIPMENT: GOOD TO GO**



OPERATION:			
MECHANIC:		EQUIPMENT#	
2nd MECHANIC:		Y CHARGE:	
OPEN DATE:		CLOSING DATE:	
OPEN HOUR METER:		CLOSED HOUR METER:	
	COMPONENT:	STATUS:	
1	OIL ENGINE		
2	COOLANT ENGINE		
3	RADIATOR / HOSES		
4	BELTS		
5	BATTERY		
6	GAUGES / INSTRUMENTS		
7	LIGHTS		
8	HORN		
9	SEAT / SEAT BELTS		
10	BRAKES		
11	PARKING BRAKES		
12	FIRE EXTINGUISHER		
13	GLASS		
14	MIRRORS		
15	TIRES		
16	EXHAUST SYSTEM		
17	CHARGING SYSTEM		
18	TRANSMISSION / SHIFTING		
19	HOIST CYLINDERS		
20	TILT CYLINDERS		
21	SIDE SHIFT CYLINDERS		
22	TWISTLOCK CYLINDERS		
23	EXTENTION CYLINDERS		
24	LIGHTS / TWIST LOCKS		
25	STEERING		
26	REVERSE ALARM		
27	HOSES / HYDRAULIC		
28	AIR COMPRESSOR		
29	AIR LEAKS		
30	OIL LEAKS		
REMARKS:			



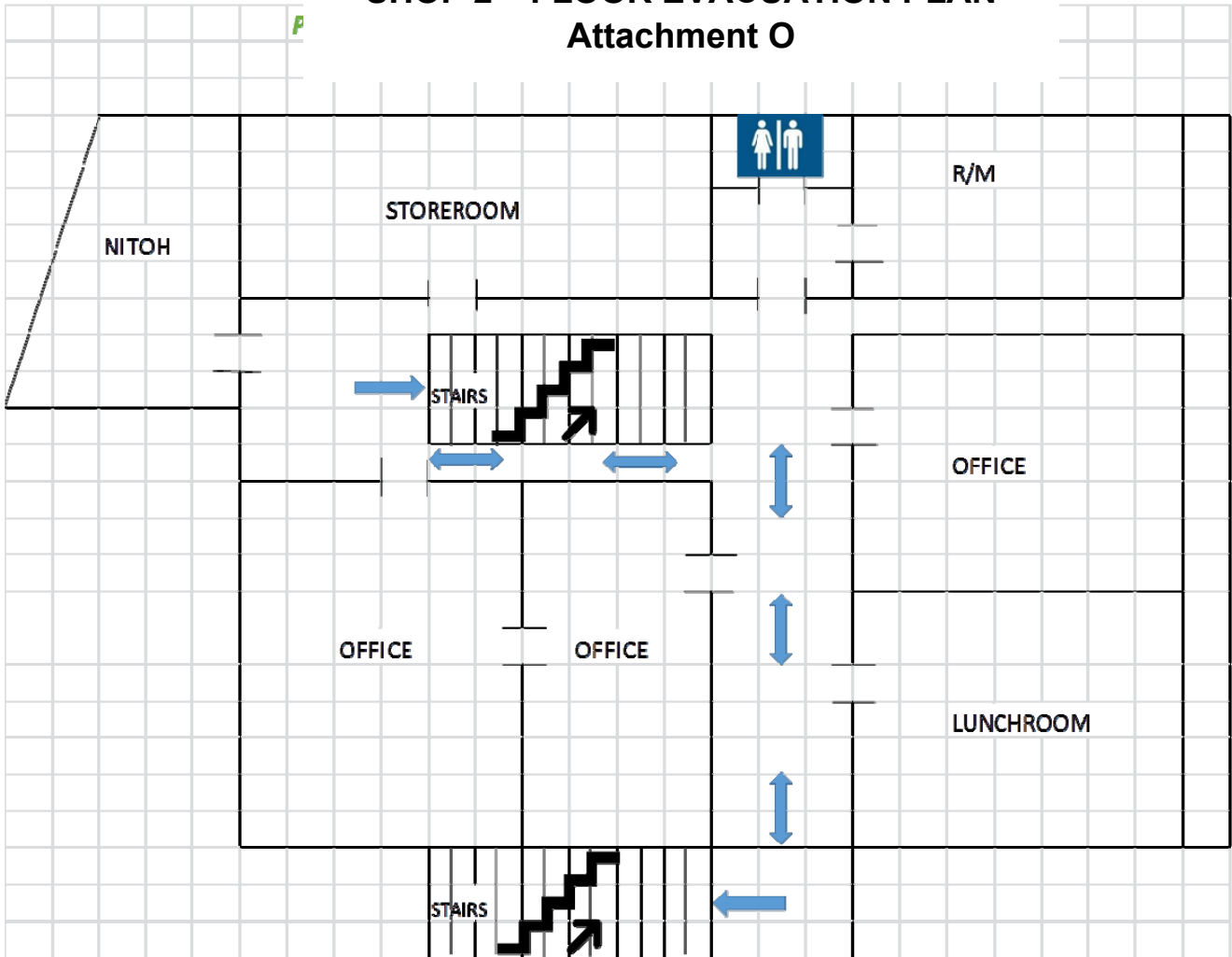
ADMINISTRATIVE OFFICE EVACUATION PLAN  
Attachment N



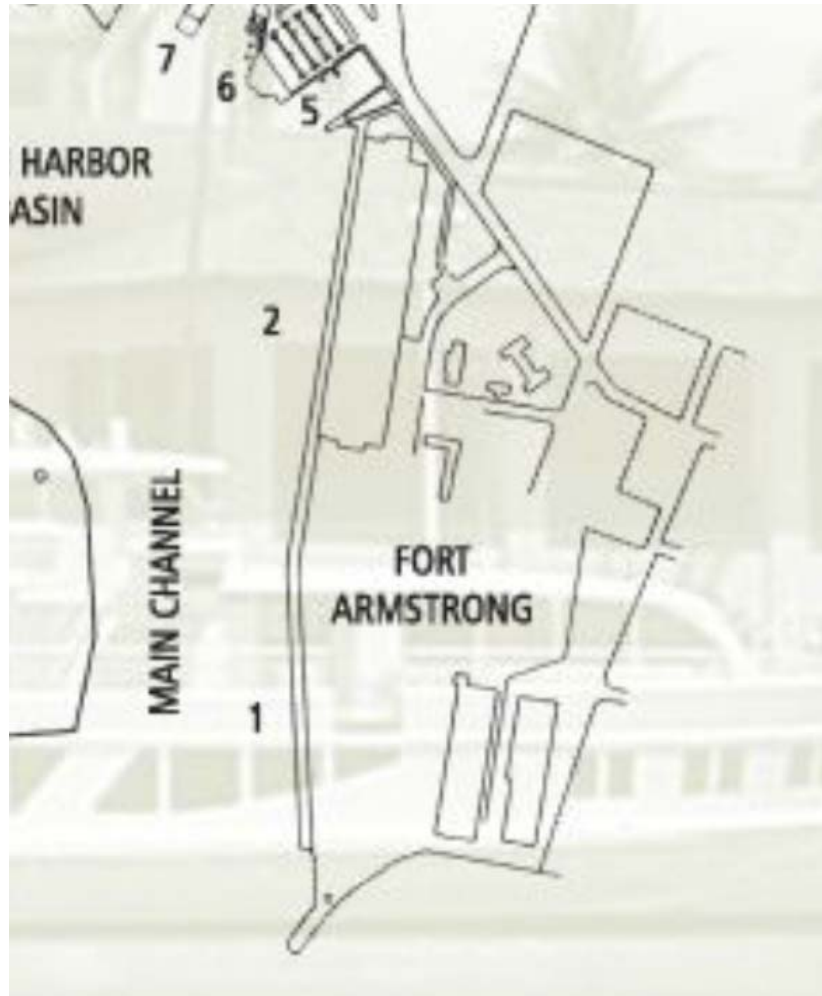
All personnel will assemble in the parking lot in the vicinity of Punchbowl Street and will check-in with the CFO

- Legend**  
Primary routes  
Secondary routes

# SHOP 2<sup>nd</sup> FLOOR EVACUATION PLAN Attachment O



**PIER 1 & 2 EVACUATION PLAN  
Attachment P**



The Supervisor using the diagram above shall designate emergency escape routes and meeting place prior to the start of Operations/Shift.

All employees assigned will be briefed on the evacuation plan during pre-shift safety briefing.

The Supervisor shall consider the work being performed, the location on the pier, and prevailing winds when developing the evacuation plan.

## PIER 10 & 11 EVACUATION PLAN Attachment Q

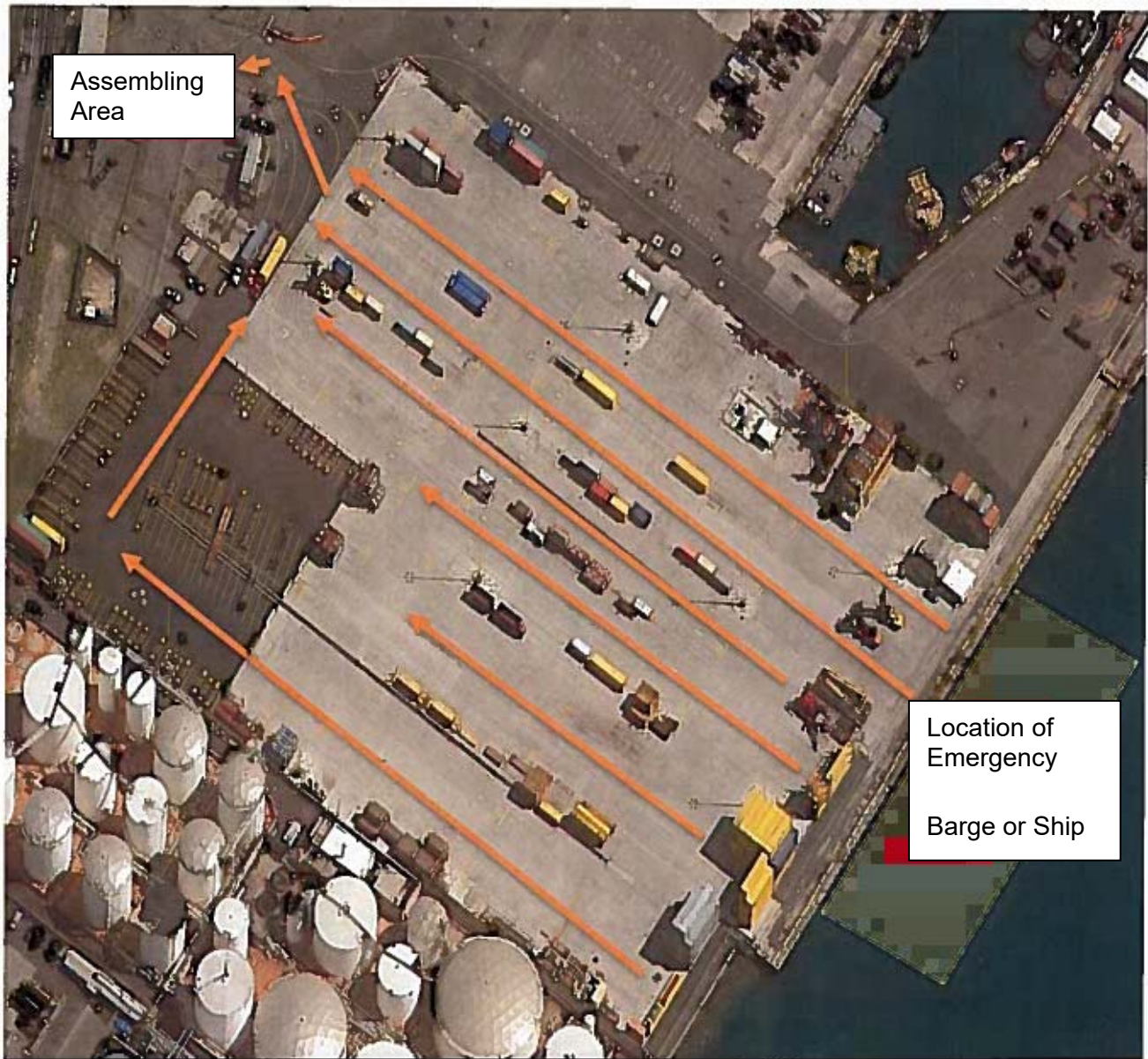


The Supervisor using the diagram above shall designate emergency escape routes and meeting place prior to the start of Operations/Shift.

All employees assigned will be briefed on the evacuation plan during pre-shift safety briefing.

The Supervisor shall consider the work being performed, the location on the pier, and prevailing winds when developing the evacuation plan.

## PIER 29 EVACUATION PLAN Attachment R

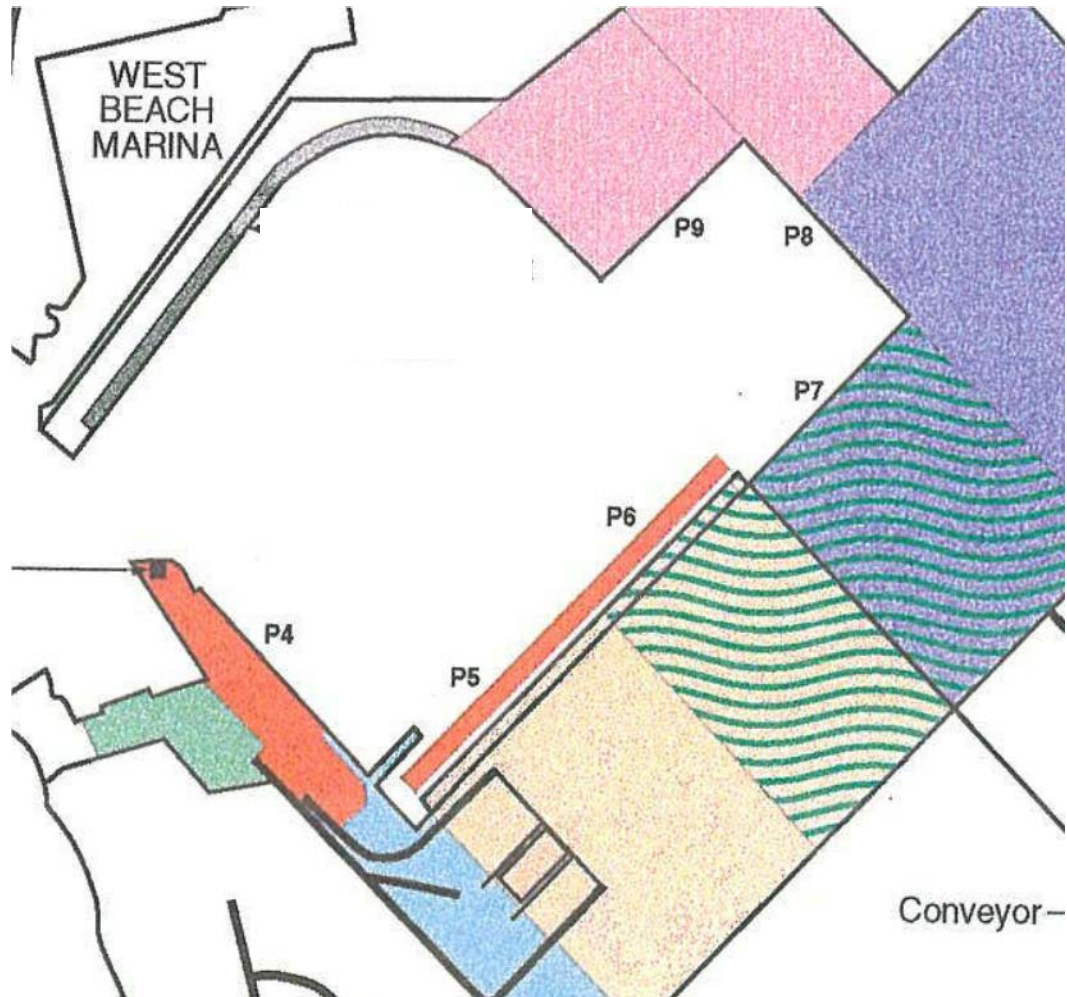


The Supervisor using the diagram above shall designate emergency escape routes and meeting place prior to the start of Operations/Shift.

All employees assigned will be briefed on the evacuation plan during pre-shift safety briefing.

The Supervisor shall consider the work being performed, the location on the pier, and prevailing winds when developing the evacuation plan.

## KALAELOA, BARBERS POINT EVACUATION PLAN Attachment S

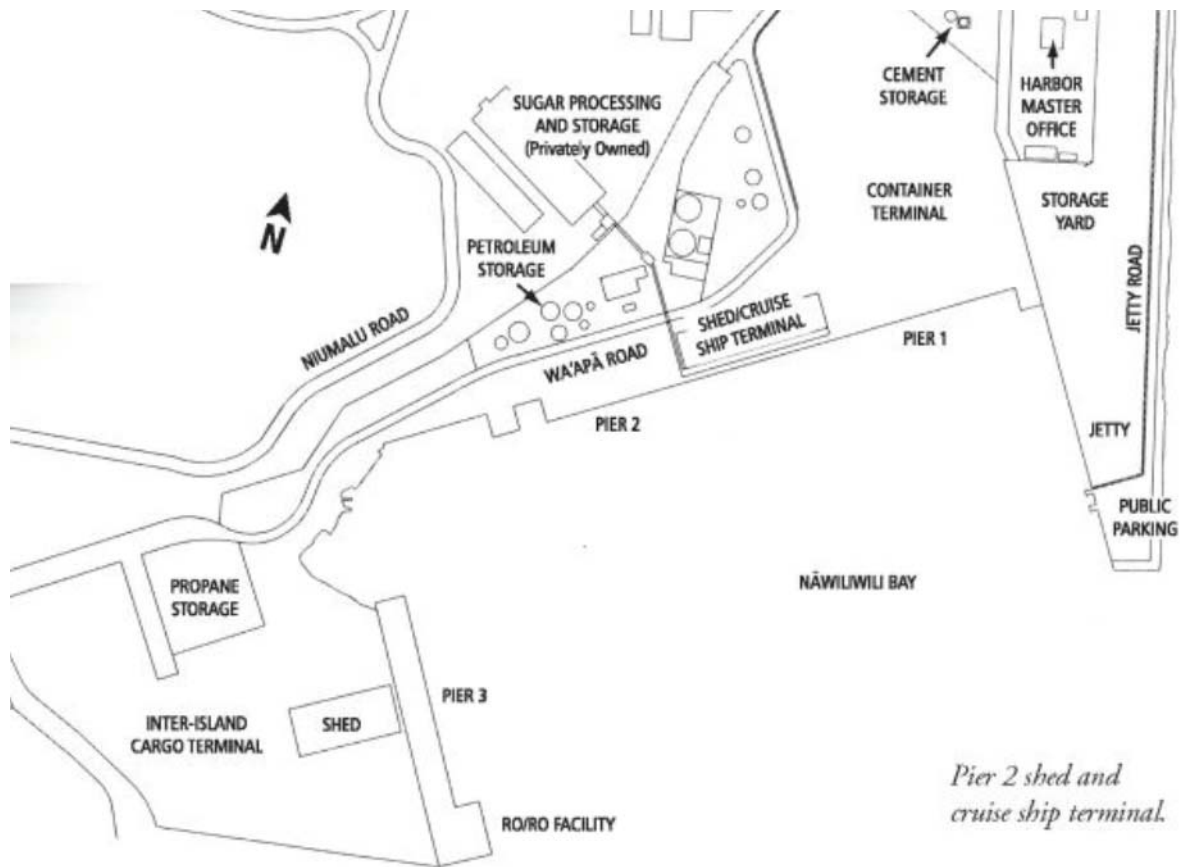


The Supervisor using the diagram above shall designate emergency escape routes and meeting place prior to the start of Operations/Shift.

All employees assigned will be briefed on the evacuation plan during pre-shift safety briefing.

The Supervisor shall consider the work being performed, the location on the pier, and prevailing winds when developing the evacuation plan.

## NAWILIWILI EVACUATION PLAN Attachment T



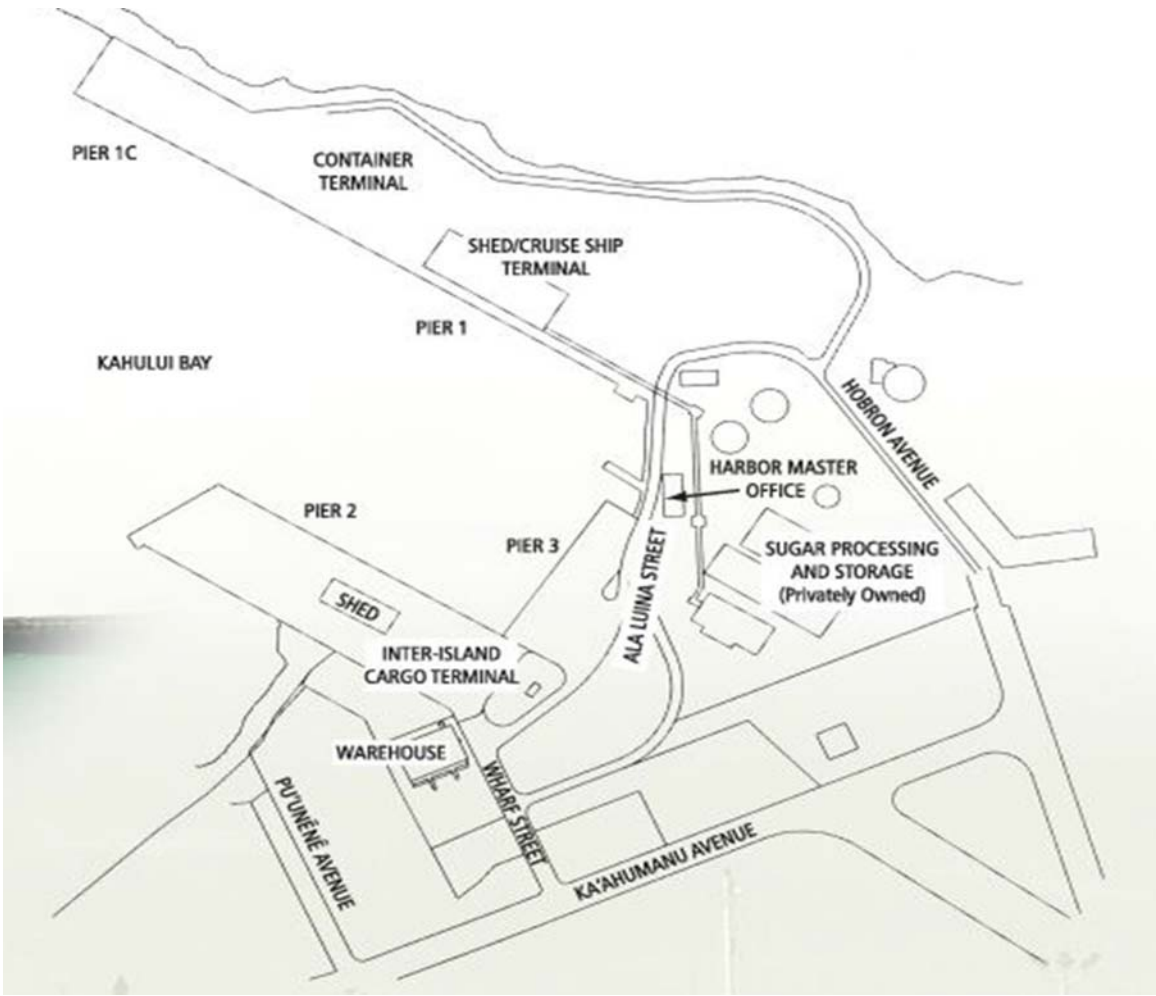
*Pier 2 shed and  
cruise ship terminal.*

The Supervisor using the diagram above shall designate emergency escape routes and meeting place prior to the start of Operations/Shift.

All employees assigned will be briefed on the evacuation plan during pre-shift safety briefing.

The Supervisor shall consider the work being performed, the location on the pier, and prevailing winds when developing the evacuation plan.

**KAHULUI EVACUATION PLAN  
Attachment U**



The Supervisor using the diagram above shall designate emergency escape routes and meeting place prior to the start of Operations/Shift.

All employees assigned will be briefed on the evacuation plan during pre-shift safety briefing.

The Supervisor shall consider the work being performed, the location on the pier, and prevailing winds when developing the evacuation plan.



## Change Log

Revision #	Document Revision Date	Description of Change	Approval(s)
Rev. 001	11/02/15	Add Refresher Training Requirement	John Fahling