



MADDISON
C O N S T R U C T I O N

HEALTH & SAFETY POLICY

2015 V.1

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1 – POLICY STATEMENT

Maddison Construction Limited (MCL) is committed to the safety of our work sites and the prevention of workplace accidents and exposures to harmful substances. This commitment includes not only our employees but also our subcontractors and their employees, client representatives, site visitors and the general public adjacent to our sites.

Maddison Construction Limited's management and site supervisors are accountable for the occupational health and safety of workers under their supervision.

Every worker must protect his or her own health and safety by working in compliance with regulations and with safe work practices established by the company. Every worker must also be vigilant in minimizing hazards that may place others at risk.

To this end, Maddison Construction Limited will:

- demonstrate personal commitment and leadership at the management and supervisory levels
- provide clearly-stated rules, monitoring compliance and taking appropriate corrective action
- ensure compliance with the Occupational Health and Safety Act (OHS)
- ensure that all employees are fully trained and qualified for the tasks they are asked to perform
- measure and reporting performance
- eliminate risks through regularly identifying hazards and implementing appropriate controls and corrective action
- investigate all significant accidents and health exposures and near misses, determining root causes, implementing broad-scale corrective action
- ensure a high standard of OHS performance from subcontractors by careful selection, performance monitoring and enforcement

Daniel Maddison
President
Maddison Construction Limited

2 – LEADERSHIP

2.1 Personal Leadership

Every management visit to a worksite must have visible safety aspects even though the main reason for the visit may relate to schedules, costs, material availability, etc. A safety leader will:

- be sure to have and wear the required Personal Protective Equipment (PPE)
- know and personally comply with the rules while on site
- immediately intervene and correct unsafe activities or conditions that are observed

This approach will result in a heightened awareness of the importance that MCL places on worksite safety rules. Always address safety issues first before getting into the details of the rest of the business.

Workers cannot be expected to comply with rules if managers and supervisors either:

- fail to personally comply, or
- fail to insist that workers comply, or
- express disagreement with the rules even though they may be complying, or
- are so wrapped up in other business that they let their safety focus slip

2.2 Organizational Definitions

- "Owner "
- "Management" includes the officers of the company and the project managers.
- "Supervisors" are the full-time project foremen and site supervisors.
- "Employees" are MCL workers on the work site.

2.3 Owner's Responsibilities

The owner of a workplace that is not a project shall ensure that:

- the workplace complies with the regulations, and no workplace is constructed, developed, reconstructed, altered or added to except in compliance with the OHS Act and regulations.
- the equipment, materials and protective devices as prescribed are provided
- the equipment, materials and protective devices provided by the employer are maintained in good condition.
- the measures and procedures prescribed are carried out in the workplace.

2.4 Management's Responsibilities

Management is responsible to support and execute the following management concepts:

- Demonstrating personal commitment and leadership at the management and supervisory levels
- Providing clearly-stated rules, monitoring compliance and taking appropriate corrective action
- Ensuring compliance with OHS legislation
- Ensuring that all employees are fully trained and qualified for the tasks they are asked to perform
- Setting annual OHS performance targets, measuring and reporting performance
- Eliminating risks through regularly identifying hazards and implementing appropriate controls and corrective action
- Investigating all significant accidents and health exposures and near misses, determining root causes, implementing broad-scale corrective action

- Ensuring a high standard of OHS performance from subcontractors by careful selection, performance monitoring and enforcement

More specifically, support activities and responsibilities include:

- Conducting Project Hazard Reviews in the planning stages of each project
- Providing safeguards in the form of procedures, training and equipment to minimize anticipated risks
- Coordinating and conducting pre-job safety meetings with employees, subcontractors and clients (See Section 12 – Safety Meetings and Communications)
- Ensuring the timely and accurate reporting of accidents to
 - Appropriate government authorities, immediately
 - MCL President, immediately by phone and in writing within 24 hours
 - Client representative in accordance with contract requirements, usually immediately (see Section 12.2)
- Conducting investigations into all significant accidents and near misses
- Managing the completion of corrective actions resulting from inspections, audits, and investigations
- Including subcontractor OHS performance as a significant determining factor in the selection process

2.5 Supervisors' Responsibilities

Supervisors are responsible to understand, support, comply with and enforce MCL procedures and rules and all associated OHS legislation.

- With the Project Manager, participating in Project Hazard Reviews in the planning stages of each project
- Implementing safeguards in the form of procedures, training and equipment to minimize anticipated risks
- Participating in pre-job safety meetings with employees, subcontractors and clients
- Ensuring the safety of everyone who enters the site
- Maintaining up-to-date site OHS records, including
 - Sign-in/out sheets (as applicable)
 - Safe Work Permits (as applicable)
 - Safety meeting minutes (form required)
 - Incident and Accident reports (form required)
- Controlling access to the project site
- Briefing all site visitors regarding hazards and site rules
- Reporting all accidents and near misses to:
 - Appropriate government authorities, immediately
 - MCL Management, immediately by phone and in writing within 24 hours
 - Client representative immediately, if MCL Management can not be contacted
- Assisting in investigations into all significant accidents and near misses
- Completing corrective actions resulting from inspections, audits, and investigations
- Monitoring and enforcing subcontractor OHS compliance
- Ensuring that Emergency Response plans and equipment are adequate and understood
- Taking command of response actions in case of emergency
- Ensuring that WHMIS Materials Safety Data Sheets (MSDS) are available on the job site for project specific hazardous materials
- Ensuring that hazardous or environmentally toxic materials are handled and disposed of in a responsible fashion to meet legislated standards.
- Ensuring equipment, tools and facilities are properly maintained.
- Ensuring good housekeeping practices.
- Ensuring an adequate supply of personal protective equipment is available and maintained in good condition.
- Maintaining a copy of the MCL Health & Safety Policy on the job site
- Honour the Company Environmental Policy

2.6 Employees' Responsibilities

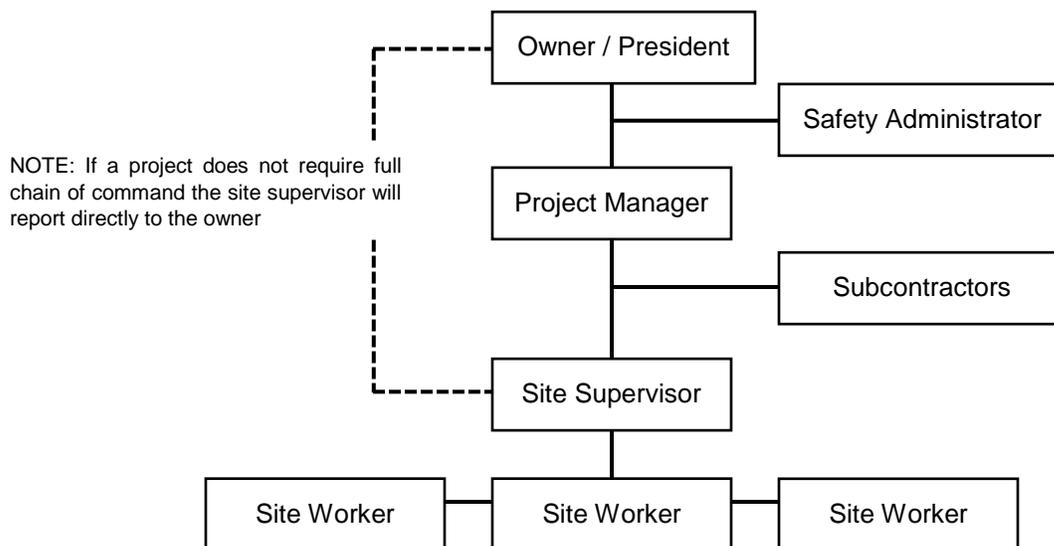
Employees are responsible to understand, support, comply with OHS policy, procedures and rules and all associated OHS legislation.

All employees are responsible for their own health and safety as well as the safety of their fellow workers.

Each employee is responsible to:

- Work safely with equal concern for the safety of co-workers, and all on-site personnel.
- Comply with Occupational Health & Safety legislation and MCL requirements
- Take precautions to ensure that no one is exposed to hazardous materials and that they are not released into the environment
- Understand the Workplace Hazardous Materials Information System (WHMIS) and know where Materials Safety Data Sheets (MSDS) are available on the job site for project specific hazardous materials.
- Wear personal protective equipment as required to safely complete their daily objectives/tasks
- Report all unsafe conditions to your supervisor
- Report all accidents and near misses immediately to your supervisor
- Understand the details of the Emergency Response Plan; signals, muster points, telephone and numbers, first aid and firefighting equipment, etc.
- Participate in the investigation into any accident or incident as required.
- Not perform an unsafe task.

2.7 Organization / Structure



2.8 WSIB Claims Management

MCL is fully supportive of the benefits to injured workers provided through the Ontario Workplace Safety and Insurance Bureau. We are also committed to managing premium expenses fairly and prudently.

Our claims management process is as follows:

The Project Manager and the Site Supervisor will review all claims with input from the claimant.

The objective is to find opportunities to return the injured employee to meaningful work in a manner that

- Does not interfere with rehabilitation
- May offer learning opportunities
- May involve work that is not normally part of the job
- Provides valuable service to the company

2.9 Return to Work Policy

A workplace injury can be devastating to the worker and his/her family. Our focus is the prevention of all workplace accidents and injuries. However, in the event of an occupational injury we have adopted the philosophy of returning an injured worker to meaningful and productive work, where possible, in order to protect their earnings ability and minimize the disruption to their personal lives.

A Return to Work Program has been developed which is committed to providing suitable work consistent with the functional capabilities of an injured worker. In almost every case we will be able to immediately accommodate the worker with modified work within their physical capabilities. The goal of the program is to return the worker to their pre-injury position through good communication with all parties involved and through fair and consistent treatment in the provision of modified duties.

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

3 – TRAINING AND QUALIFICATIONS

3.1 New Employee Orientations

All new employees shall receive a formal orientation program including:

- MCL Health and Safety Policy
- Responsibilities of employees for their position and any positions supervised
- Legal compliance
- Refusal of unsafe work
- Reporting of unsafe conditions
- Accident and near miss reporting
- Drug and Alcohol Policy
- General worksite rules
- PPE
- Employee's formal and informal training and qualifications
- Further training requirements and plan

Orientation must be provided by a Project Supervisor or higher, and documented in the employees personnel file. All new employees shall receive and sign for a personal copy of the MCL Health & Safety Policy.

3.2 General Training Requirements

The training required, received and planned for all employees must be included in personnel files and reviewed by the employee's supervisor and the employee at least annually in accordance with the following table:

Position	Training Requirement	Re-training Requirement	Planned
Project Manager	WHMIS	annual	
Site Supervisor	WHMIS	annual	
	Fall Arrest	annual	
Employee	WHMIS	annual	
	Fall Arrest	annual	
	First Aid*	3 years	
	Confined Spaces**	annual	

*one employee per project site required to have first aid training

** as required for specific projects

3.3 Legislated Training Requirements

Legislated safety related training requirement include:

- WHMIS
- First Aid/CPR (for selected employees)
- Basics of Fall Protection
- Confined Space (if applicable)

The MCL Health & Safety Administrator is responsible to:

- Maintain record of all legislated training requirements for MCL employees
- Schedule required training/retraining/refresher training sessions
- Arrange for individuals to attend
- Confirm that qualifications have been achieved or renewed

4 – Risk Management

4.1 General Requirements

Inherent in OHS legislation and expressed in the "MCL Health & Safety Policy" is the requirement for management, supervisors and employees to eliminate risks through regularly identifying hazards and implementing appropriate controls and corrective action.

4.2 Identifying Hazards, Assessing Risk

Hazards are situations or activities that may be dangerous. Assessing risk means looking at a hazard to determine

- What is the probability that an accident will happen?
- If an accident happened, how serious would it be?

This is an on-going process that starts with the project-planning phase and continues through to the end of the project. Typically the Project Manager, Project Supervisor, and client representative start with a review of the site and the project drawings and documents.

- Potential hazards are identified.
- Risks are assessed
- Safeguards such as special procedures, equipment and site controls are selected
- Requirements are introduced at the pre-job safety meeting

Hazards are also identified through observations and inspections on the project. Management, Supervisors and employees must also develop the personal habit of focusing on:

- Unsafe activities, such as improper ladder use, and/or
- Unsafe conditions such as faulty equipment
- Corrective actions such as stopping work, cautioning, reporting, fixing the problem

MCL Management personnel are required to

- communicate any potentially unsafe conditions to the Project Supervisor and/or subcontractors
- documenting the conditions identified
- ensuring that the unsafe conditions are corrected

Project Supervisors are required to

- Regularly observe, intervene and correct on a daily basis

- Once per week conduct a detailed site safety inspection

Employees are required to

- Regularly observe and consider what hazards exist or may be developing
- Stop the activity if deemed risky or hazardous
- Warn others of the potential hazards
- Make corrections, and
- Report hazards to the Project Supervisor

4.3 Risk Elimination

Trade Standards and Codes

The most common risks are routinely minimized through

- Following standard trade practices, carpentry, plumbing, excavation, masonry, etc.
- Complying with regulations and codes
- Equipment design, such as safety guards on power saws

Regulations and Client Requirements

It is possible that regulations, the client's requirements and MCL's Health & Safety Policy may govern a specific task. In all cases Project Supervisors must ensure compliance with regulations. Where there are differences between MCL Health & Safety Policy and the client requirements, the higher standard should be used. Any discrepancies between MCL's procedures and the client's requirements must be resolved at the project planning stage, between the Project Manager and the client's representative.

4.4 Site Controls

MCL closely controls its project sites to ensure that

- Members of the public, especially curious children are not allowed on site where they may become at risk
- Vehicle access does not put workers at risk
- Exposures to theft and vandalism are minimized
- Liabilities are minimized
- Controls include:
 - Secure perimeter fencing (if applicable)
 - Warning signs
 - PPE requirements for all on site
 - Sign-in and out procedure
 - Project Supervisor safety briefings
 - Worker observation and cooperation
 - Project Supervisor's full authority

5 – ACCIDENT AND INCIDENT MANAGEMENT

5.1 General Reporting Requirements

The law requires prompt and accurate reporting both by the project owner and MCL. The objectives are

- To ensure legal compliance
- To promptly and accurately record details for future investigation
- To assist in the prevention of future accidents

In many cases an incident results in an emergency situation that could worsen if not handled immediately. Taking care of the immediate emergency must always be the first priority. Once the situation has been stabilized, the

incident must be promptly reported, but only when it is safe to do so. When in doubt, report. It is always better to over-report than to fail to report.

Employees and subcontractors must

- Report all accidents, incidents and near misses immediately to the Site Supervisor.

The Site Supervisor shall

- Immediately advise the Project Manager by phone
- Investigate the incident and complete an Accident Investigation Report
- Submit the report to the office no more than 24 hours after the incident.

The Project Manager shall

- Ensure that reports to government are promptly and accurately made
- Report to the Project Owner as required
- Determine whether or not a formal detailed investigation is required
- Conduct or participate in the investigation and corrective action process

Definition of Critical Injuries

As defined in Regulation 834/90, under the *Occupational Health and Safety Act* of Ontario

"For the purposes of the Act and the Regulations, "critical injury" means an injury of a serious nature that,

- (a) place life in jeopardy;
- (b) produces unconsciousness;
- (c) results in substantial loss of blood;
- (d) involves the fracture of a leg or arm but not a finger or toe;
- (e) involves the amputation of a leg, arm, hand or foot but not a finger or toe;
- (f) consists of burns to a major portion of the body; or
- (g) causes the loss of sight in an eye."

5.2 Detailed Reporting Requirements

Incident/Accident Type	Government	Project Owner	Maddison Construction Limited
Critical or Fatal Injuries	Ministry of Labour (s.51) – immediately WSIB – within 3 days	Yes	Yes, immediately by phone, written report required
Serious Personal Injury (beyond first aid)	Ministry of Labour (s.52) – within 4 days if employee is injured party WSIB – within 3 days*	Yes	Yes, immediately by phone, written report required
Minor Injury (first aid only)	No	Yes	Yes, by phone on the same day, written report required
Occupational Illness	WSIB – within 3 days	Yes	Yes, by phone on the same day, written report required
Major Spill or Release of Hazardous Material	Yes – see note below**	Yes	Yes, immediately by phone, written report required
Significant Equipment Damage	No, unless specifically required	No	Yes, by phone on the same day, written report required
Theft or Vandalism	Yes, local police	No	Yes, immediately by phone
Fire or Explosion	Yes, Fire Department Ministry of Labour (s.53) - within 2 days	Yes	Yes, immediately by phone, written report required
Near Miss Incident (no accident, but a learning opportunity)	No, unless specifically required	Yes	Yes, by phone on the same day, written report required

* if the worker:

- loses time from work, or
- earns less than a regular day's pay, or
- gets health care treatment

** any quantity:

Spill Action Centre 1-800-268-6060

5.3 Investigations

Incident and accident reporting forms are useful for collecting the basic information and determining the "immediate cause". Depending on the nature and severity of the accident, a detailed investigation may also be conducted by a trained investigator (MCL, client, or government) to determine the "root causes" and recommend corrective action.

It is essential for the Project Supervisor to

- Preserve physical evidence
- Take photographs and/or make sketches of the accident scene
- Record witness's personal information
- Obtain witness statements

For example, an employee might receive an eye injury while using a power saw. The "immediate" cause might be the failure to wear safety glasses. The "root" causes may include

- Unclear company policy
- Poor training program
- Poor supervision and inspection

The investigator may make corrective action recommendations to MCL, for example improvements to

- The company's written rules
- Training of employees, or
- On-site supervision and inspection requirements

5.4 Contributing Causes of Accidents

An accident can be defined as an unplanned event that results in personal injury, damage to equipment or property, harm to the environment, or disruption to normal process.

Accidents happen suddenly, seemingly without warning. They do not happen without a cause. The contributing causes include:

- Inattention.
- Poor communication.
- Poor housekeeping.
- Fatigue.
- Not using proper personal protective equipment (PPE).
- Lack of adequate training/job instruction.
- Lack of inspection and/or maintenance.
- The use of improper tools or equipment.
- Following wrong or inappropriate methods.
- Carelessness with respect to the handling of hazardous materials.
- Operating equipment without the proper authorization.
- Taking shortcuts and unnecessary risks.

When any of the above is present in the work place an incident or serious accident is likely to occur. By maintaining a professional attitude toward workplace safety we can systematically eliminate the causes of accidents.

6 – HAZARDOUS MATERIALS AND WHMIS

6.1 Workplace Hazardous Materials Information System (WHMIS)

In Canada hazardous materials are regulated through the Workplace Hazardous Materials Information System. A hazardous material is defined as a solid, liquid or gas that may cause injury, illness or death by:

- Skin or eye contact
- Inhalation or swallowing
- Radiation
- Fire/explosion

Hazardous materials are common on industrial construction sites. For this reason all employees and supervisors are to have WHMIS training. And WHMIS Materials Safety Data Sheets for the controlled products on a particular project must be available for inspection on the job site.

6.2 WHMIS Symbols

WHMIS labels must appear on most controlled products and be clear, easy-to-read and prominently displayed on the container. There are 6 classes of controlled products and 8 hazard symbols. It is very important that you know the hazards associated with each symbol.

	<p>Compressed Gas – Class A</p> <ul style="list-style-type: none"> – explodes if heated or struck; can become a "missile" if punctured – contact with the liquid form causes frostbite – examples: compressed air, propane
	<p>Flammable and Combustible Material – Class B</p> <ul style="list-style-type: none"> – catches fire if exposed to a source of ignition or heated – direct sunlight can generate enough heat to ignite some materials – examples: gasoline, toluene, metallic sodium
	<p>Oxidizing Material – Class C</p> <p>NOTE: Keep these materials separated from flammables and combustibles.</p> <ul style="list-style-type: none"> – intensifies a fire – examples: oxygen, calcium nitrate, chlorine, acetylene
	<p>Materials Causing Immediate and Serious Toxic Effects – Class D Division I</p> <ul style="list-style-type: none"> – fast acting poisons with very serious effects – examples: creosote, hydrogen sulphide
	<p>Materials Causing Other Toxic Effects – Class D Division 2</p> <p>NOTE: The hazards in this division are not described by the symbol.</p> <ul style="list-style-type: none"> – effects on bodily organs after long exposure – examples: asbestos, lead, silica – cancer – example: benzene – reproductive toxicity – examples: many anaesthetic gases – teratogenicity and embryotoxicity – example: ethyl alcohol – mutagenicity – examples: the medical drug diethylstilbestrol – sensitization of the skin or respiratory tract – example: formaldehyde (skin) – skin and eye irritation – example: methanol
	<p>Biohazards Infections Material – Class D Division 3</p> <p>NOTE: Biohazards are normally found only in hospitals or special laboratory settings.</p> <ul style="list-style-type: none"> – containers of microorganisms and products extracted from them – examples: AIDS virus, Legionella, Rubella
	<p>Corrosive Material – Class E</p> <ul style="list-style-type: none"> – causes irreparable damage to skin or eyes on contact – examples: caustic soda, hydrochloric acid, slaked lime
	<p>Dangerously Reactive Material – Class F</p> <ul style="list-style-type: none"> – becomes unstable or reacts with other materials to cause fires or explosions – reacts with water to give toxic or flammable gases – examples: acetylene, potassium cyanide

6.3 WHMIS Training

- Initial WHMIS training is required for Project Supervisors and employees who work on project sites.
- Annual refresher training is also required
- Employee training records must be maintained and made available to authorities.
- Training is provided by an institution or an individual having skills and certifications meeting legal requirements and acceptable to the President.
- Subcontractors are required to confirm that their employees are trained in accordance with WHMIS requirements.
- Project binders must contain:
 - MSDS for all controlled substances on site
 - A supply of WHMIS workplace labels
 - A WHMIS reference manual
 - Current MSDS's on site

6.4 Hazardous Materials and the Environment

MCL follows strict compliance with all environmental rules and regulations governing the handling and disposal of materials potentially harmful to the environment.

These include:

- Hydrocarbons (petroleum products, solvents and cleaners)
- Fluorocarbons (refrigerants)
- Heavy metals (in paint and some coatings, for example)
- Construction waste products
- Industrial waste products

At no time can these materials be deliberately spilled or jettisoned and if they are released accidentally they must be cleaned up immediately.

7 – PERSONAL PROTECTIVE EQUIPMENT (PPE)

7.1 General

Personal protective equipment (PPE) provides the final barrier between a worker and a potential hazard. It is very important that PPE is selected, inspected, cared for and used properly to prevent injuries. MCL general requirements are stated below. Additional requirements may be necessary as determined by

- Regulations
- Project owner's requirements
- Project Supervisor's judgment

7.2 Head Protection

Hard hats are mandatory on all job sites. They must be worn properly and maintained in good condition. Head protection is to be worn any and all times including service and maintenance periods after turn over to client.

7.3 Eye Protection

While performing or exposed to certain higher risk tasks, the use of safety glasses is mandatory. Goggles and/or face shields shall be worn while grinding, cutting or welding. Eye protection is to be worn any and all times including service and maintenance periods after turn over to client.

7.4 Hearing Protection

Hearing protection is required in high noise level areas when the noise level is above 85db. Hearing protection shall be worn when exposed to acute and prolonged exposures.

7.5 Foot Protection

All workers shall wear approved steel-toed work boots.

- CSA green tag rated
- Oil resistant soles
- Above ankle height
- Electrically resistant

Steel toes shoes or sneakers are only allowed during the finishing stages of a project.

7.6 Fall Protection

Full body harness must be worn when working in excess of 10 feet above grade when no other means of full arrest is present (e.g. scaffolding, staging, etc.). Fall protection gear shall also be worn above open water, operating equipment or other hazardous materials.

7.7 Life Jackets

Ministry of Transportation approved personal floatation devices (PFD) must be worn when working within 6 ft. of liquid edge or an unguarded dock. PFD's are also required when working in an open boat. In addition MCL will provide rescue ring buoys whenever employees will be working near a water related hazard.

7.8 Respiratory Protection

Respiratory protection is required in areas where the person is exposed to airborne substances that are harmful on inhalation or in atmospheres that are deficient in oxygen.

- Particulate respirators and masks provide protection against airborne dust caused from grinders, buffers, cleaning of furnaces, asbestos.
- Cartridge respirators with organic vapour cartridges protect against solvent or petroleum vapours.
- The correct cartridge must be used and must be changed frequently
- The type of respirator is determined by
- The nature of the contaminant
- The protection factor and
- The provincial exposure limit regulations.

In atmospheres that are deficient in oxygen or when working in equipment containing hydrogen sulfide (H₂S), fresh air breathing equipment must be worn.

7.9 Hands

All workers must carry work gloves on their person and must use them when performing tasks or handling materials that may result in injury due to cuts, slivers etc. Inferior quality gloves such as cotton or polyester with leatherette palms or gloves of „leatherette“ and ill fitted design, are not acceptable. Rubber or neoprene gloves must be used for work where petroleum absorption is likely. Hand protection is to be worn any and all times including service and maintenance periods after turn over to client. It is the responsibility of each employee to wear appropriate gloves as required for specific task.

7.10 Safety Vests

High visibility safety vests are a requirement on all MCL project sites. Safety vests are to be worn any and all times including service and maintenance periods after turn over to client.

7.11 Clothing

Work clothing must be kept in good repair and cleaned regularly

- Shorts are not permitted
- Long sleeves are recommended
- Clothing with at least 35% natural fibres such as wool or cotton is recommended. This is more important for workers in the vicinity of petroleum vapours. In the event of fire, clothing with high synthetic content (such as nylon, polyester, or acrylic) may melt onto the skin, causing additional burn injuries. 100% cotton or wool is recommended. Fire retardant materials such as Nomex are also recommended in high exposure (petroleum) work.
- One hard hat and one high visibility vests will be provided by MCL for each employee. Replacements will be the responsibilities of the employee. Employees will be removed from duties if no PPE available.

7.12 Exemptions

The Project Supervisor must specifically approve any exemptions to PPE rules. For example, in later stages of the project, indoor workers may be exempted from wearing vests.

8 – EMERGENCIES

8.1 Planning and Preparation

The Project Hazards Review, conducted by the Project Manager in the planning stages is the ideal time to assess what kinds of emergencies might arise. Standard MCL procedures may be adequate, or there may be a requirement for project-specific procedures.

- Emergency response procedures whether they are standard or special must be included in the project binder.
- Emergency response plans must be reviewed and discussed with employees and subcontractors at the pre-job safety meeting and at the mid-project safety meeting.
- After any emergency response, the project Manager and the Project Supervisor must review the procedures to ensure that they are optimum.

Before any project is started, and weekly during the project, the Project Supervisor is required to ensure that

- Emergency fire spill and medical aid numbers are adequately posted
- Response equipment including fire extinguishers, spill kits and first aid kits are in place, and adequate
- Emergency vehicle access is adequate

8.2 Standard Accident Response Procedures – Project Supervisor

(Camera and notebook required)

Make site safe: take control of the scene and ensure that no further injury contamination or damage occurs.

Protect people: Provide rescue, evacuation first aid, summon medical/emergency services, and ensure that any injured persons are cared for.

Protect the environment by containing a spill

Protect property by fighting fire, calling fire department

Preserve site conditions: tape area if needed, restrict access, and preserve the evidence. Look for any immediate conditions that may have contributed to the incident.

Identify witnesses: name, occupation and company, phone number, reason(s) on site. People involved in or connected to the incident. More is better than less.

Take photos: immediate area of incident/accident, tools & defence barriers or PPE (Personal Protective Equipment) that failed, injured party if appropriate, property damage & overall condition of the site.

Make sketches: same as item #5 and overall site area (sketch of the site with an X locating the incident/accident).

Make preliminary assessments: overall assessment of what appears to be the cause. The investigation will identify actual cause(s). Get the big picture first. Don't dismiss info that does not fit. Determine how the system should work.

Notify relevant parties: MCL management immediately

8.3 Standard Response Procedures – Management

1. Notify government authorities (WSIB, police, environment, etc.)

2. Notify Client's representative

3. Supply as much as possible the following info:

- What happened (nature/description of incident or accident, individual or property damage i.e. type of injury, part of body, what building part or whole, what vehicle, etc.)
- Who was involved (name of individual, who does he/she work for, sub trade, supplier, client, GC, site operator, visitor, etc.), occupation, phone number, property damage. Who did we send with injured individual? Do we have a direct communication link with assisting party? Do we have our list of witnesses completed?
- Where did it happen (site location - address, site specific - store, car wash, forecourt, pump island, washroom, bodily injury specific), where has individual been sent for treatment, type of treatment received, medical aid, first aid, hospitalisation, police report, etc. follow up with injured parties, hospital and employer.
- When did it happen (date, time, weather conditions, level of activities on site), when is individual expected to return to work. Can he/she perform light duty work?
- Why: don't focus on incident as much as barriers, defences and procedures that failed. The incident is only the resulting effect of the actual cause(s) failing. Preliminary/best assessment only at this point. A thorough investigation might be required by Client
- How same as above. A thorough investigation might be required by Client

9 – GENERAL WORKSITE RULES

9.1 Smoking

- Smoking is no longer permitted in site trailers, company vehicles or in enclosed work environments.
- Smoking is permitted in off-site designated areas only.
- Check with job supervision before smoking.
- No smoking while refueling equipment or tools or in close proximity to flammable gases.

9.2 Excavations

- All excavations must comply with Occupational Health & Safety (OH&S) regulations.
- Excavations must be properly barricaded and/or plated.
- Excavations may be considered a confined space if an atmospheric hazard exists or may exist.
- Never dig unless you are certain of what is in the ground. (CALL BEFORE YOU DIG!)
- Ensure project initiation is within 30 days of locate date and have private locate sheet if applicable.

9.3 Housekeeping

- All equipment, tools and materials must be neatly stored when not in use
- Keep all walkways, stairs, platforms and accesses free from tripping hazards.
- Clean up spills immediately
- Sand icy areas

9.4 Ladders

- Inspect ladders for defects before use.
- Ladders to be construction grade.
- Ladders must be tied off at the top to prevent accidental movement if possible.
- Do not work off the top 2 rungs.
- Stepladders are to be fully open when in use.
- Any wooden or fiberglass ladders are to be used when working on electrical equipment or circuits.

9.5 Hand Tools/ Power Tools/Machinery

- Hand tools are to be in excellent working order
- Knives to be of the highest quality, fit for purpose and to a standard to the satisfaction of the site superintendent
- Electric power tools must be grounded or double insulated.
- Keep guards on power tools and machinery.
- Before using pneumatic tools, inspect all hoses, couplings and connections to ensure they are in good condition. Chicago-type air hose connections **must be wired**.
- Protect cords and hoses on roadways with a ramp.
- Fire extinguishers are required at locations with potential for combustion. i.e. Gas/diesel engines, welders, generators.

9.6 Scaffolding & High Work Platforms

- All scaffolds, swing stages and temporary work platforms must be erected to comply with the Provincial Occupational Health & Safety Regulations.
- Scaffolding guardrails must be properly equipped with top rails and mid rails.
- Mobile scaffolding must be locked in place when in use
- When using an elevated work platform, it is a requirement that workers tie off with an approved lanyard or fall arrest system.

9.7 Welding and Torch Cutting

- Hot Work Permits are required, if applicable.
- During overhead welding all combustible materials below the work site shall be removed or protected and any persons below the work site shall be warned of operations.
- No work shall be performed on tanks or containers without prior knowledge of the contents of the tanks or containers.
- Combustible roofs and floors in the immediate vicinity of the work will be wetted down.
- The job location must be examined and found to be safe before any welding is performed.
- A fire watch equipped with an extinguisher shall be present during welding operations and for a minimum period of 30 minutes after the cessation of operations.
- Check conditions of all burning and welding equipment before use.
- Eye protection must be worn when cutting, grinding, welding or chipping,
- Welding machines must be shut down and allowed to cool down before refueling.
- All cables shall be checked regularly for cuts or frays in the insulation. Minor cuts can be repaired with electrical tape.
- Compressed gas cylinders must be kept in an upright position and secured to prevent falling.
- Hoses must be disconnected and valves locked each night.
- Hot welding and cold cutting of petroleum piping shall only be done under the supervision of qualified personnel.

9.8 Rigging and Lifting

- Only qualified workers can perform a rigger's duties.
- Ensure all slings and chokers are in good condition.
- Know the weight of the object to be lifted and ensure the crane capacities and reach are not exceeded.
- Never stand under any suspended load unless it is properly blocked.
- All lifting hooks must have a safety latch.

9.9 Confined Spaces – General

A *confined space* means a fully or partially enclosed space,

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

"atmospheric hazards" means,

- (a) the accumulation of flammable, combustible or explosive agents,
- (b) an oxygen content in the atmosphere that is less than 19.5% or more than 23% by volume, or

(c) the accumulation of atmospheric contaminants, including gases, vapours, fumes, dust or mist, that could, result in acute health effects that pose an immediate threat to life, or interfere with a person's ability to escape unaided from a confined space.

If any of the above conditions exist the company should treat that space as a confined space, unless otherwise instructed by the Minister of Labour.

Examples of confined spaces include

- Sumps for submersible turbine pumps (STP)
- Septic system components
- Oil/water separators
- Petroleum tanks

Confined space entry shall be restricted to fully trained and qualified and properly equipped workers under direct supervision operating under a safe work permit.

Equipment may include

- Safety harness and life line
- Portable gas monitor, properly calibrated
- Respirators
- Flame retardant clothing
- Ventilation equipment

9.10 Vehicles

- Only licensed workers are permitted to drive MCL vehicles.
- Workers must report any all changes in their driving status to MCL immediately.
- Only authorized personnel are permitted to operate company equipment and vehicles.
- All vehicles must be maintained in good working order with proper registration and inspection certificates.
- Obey all traffic signs and maintain speeds under 10 km/hr. on job sites.
- Backup alarms are required on all truck type vehicles over 1 ton, and on all backhoes, tractors, etc.

9.11 Inappropriate Behaviour

Inappropriate behaviour includes "rough housing", "horseplay", "goofing-off" and violence.

MCL has a "Zero Tolerance" policy towards violence in the workplace. We are committed to maintaining safe workplaces free from violence of any kind.

Violent behaviour includes:

Threatening Behaviour- such as shaking fists, destroying property, throwing objects etc...

Verbal or Written Threats- any expression of intent to inflict harm.

Harassment- includes harassing words, gestures, intimidation, bullying or any other inappropriate activities.

Verbal Abuse- insults or condescending language

Physical Attacks- hitting, shoving, pushing, kicking etc...

You are encouraged to report any workplace violence you are subject to or witness **immediately** to the Site Supervisor/Project Manager.

Rest assured that the incident will be dealt with in an appropriate and timely manner. Consequences for workplace violence will be at the discretion of the Project Manager on a case per case basis.

9.12 Manual Lifting

Many back injuries result from poor lifting techniques or over lifting. Injured workers are almost always aware of their mistakes beforehand. A back injury often happens more easily the second time.

- Poor techniques include
 - Using the back instead of the legs
 - Off-balance lifting
- Over lifting includes
 - Too much weight
 - Lifting too high

Always be prepared to consider asking for help or using mechanical equipment

9.13 Lockout and tag-out

Applies to all workers involved in managing, administering or completing work on energized equipment.

Applies to all energy sources: kinetic, chemical, thermal, electrical, radiation, gravitational, potential.

Workers may be severely injured by electrocution if someone inadvertently energizes an electrical circuit that someone else is working on. For this reason lockout /tag-out regulations must be followed on all project sites.

9.14 Cell phones

Many subcontractors depend heavily on the ability to be contacted by cell phone. However, phone conversations can be distracting, and many people have the habit of walking about with their head down while talking. This creates an unsafe condition in the presence of moving vehicles and equipment.

MCL cell phone rules are:

- Cell phones may be carried on the site
- People may answer their phones, but must stop work safely and leave the work zone to conduct the conversation.
- Excessive personal cell phone use is not acceptable.

9.15 Personal Music Devices

Earphones and personal music devices while working are not acceptable.

9.16 Fall Prevention

General

Where workers must be protected from falling hazards, MCL's preferred choice is to use wooden *guardrails*. For a horizontal opening on a work surface, a *protective cover* may be used in place of a guardrail. Where a guardrail or protective cover is not practical, a *travel restraint system* may be used. MCL projects will not normally require more complicated protection such as:

- Travel restraint systems
- Fall restricting systems
- Fall arrest systems
- Safety nets

Hazard Assessment Procedure

Question 1

Is the worker exposed to any of the following hazards?

- Falling more than 3 meters.
- Falling more than 1.2 meters, if the work area is used as a path for a wheelbarrow or similar equipment.
- Falling into operating machinery.

- Falling into water or another liquid.
- Falling into or onto a hazardous substance or object.
- Falling through an opening on a work surface

If **yes**, protection is required.

Question 2

Does the worker have access to the perimeter or an open side of any of the following work surfaces and exposure to a fall of 2.4 meters or more?

- A floor, including the floor of a mezzanine or balcony
- The surface of a bridge
- A roof while formwork is in place
- A scaffold platform or other work platform, runway or ramp

If **yes**, protection is required. If **no**, protection is not required by regulations, but it may be a good idea any way.

Question 3

If protection is required, can a guardrail or protective cover be used?

If **yes**, install guardrail or protective cover (See specifications below)

If **no**, a *travel restraint* system or even more sophisticated system is required.

- Full body harness or safety belt, attached by lifeline or lanyard to a fixed support
- Design by a Professional Engineer
- Specific training for workers
- Regular testing and inspection of equipment

MCL employees will normally use only guardrails and protective covers. Where more sophisticated systems are required, MCL will use only selected subcontractors who

- Have the required equipment and qualifications, and
- Provide the Project Manager with satisfactory Safety Program documentation

Standard Wooden Guardrail Specification – MCL

The wood

- Shall be spruce, pine or fir (S-P-F) timber of construction grade quality or better
- Shall be free of sharp objects such as splinters and protruding nails.

The rails

- Minimum dimensions 38mm X 89mm (nominal 2" X 4")
- Top rail, an intermediate rail and a toe board
- Top rail must be at least 0.9 meters but not more than 1.1 meters above the surface
- Toe board rests on the surface

The posts

- Minimum dimensions 38mm X 89mm (nominal 2" X 4")
- Must be located not more than 300mm back from the edge of the work surface
- Maximum spacing of 2.4 m (8 ft)
- Securely fastened to the surface

The strength – must withstand

- Sideways push on top rail of 150 lb (675 newtons)

- Downward push on top rail of 100 lb (450 newtons)
- Sideways or downward push on middle rail of 100 lb (450 newtons)
- Sideways push of 50 lbs (225 newtons) on toe board

Specification for a protective covering

- Adequate to support all loads to which the covering may be subjected
- Capable of supporting a live load of at least 2.4 kilonewtons (540 lb) per square meter without exceeding the allowable unit stresses for the material used
- Typically construction grade plywood, 20 mm for small man-ways
- Completely covers the opening
- Securely fastened
- Adequately identified as covering an opening

9.16 Receiving Big Material Deliveries

All construction projects involve receiving large deliveries of materials and equipment. Inadequate attention to planning, communication and control can injure people, damage the load, and delay the project. Project Supervisors should follow the checklist as appropriate for the type of materials being delivered and the type of site.

BIG MATERIAL RECEIVING CHECKLIST

GENERAL	
What is the preferred direction and gate for arrival?	
Back in or drive in? Back out or drive out?	
Overhead obstacles? (canopy, trees, electrical wires)	
Ground obstacles? (trenches, other materials or equipment)	
Type of truck (flat deck, cube van, tanker, semi/straight truck)	
On-site roadway (slope, width, turning, bearing capacity)	
Size and weight of load components?	
Type and capacity of equipment required for off-loading?	
Off-loading equipment supplied and operated by whom? (MCL, trucker, other)	
Material storage site type? (accessible, level, weather protection or base required)	
Flagmen, backing guides and signs	
Driver instructions given to carrier/supplier (approach route, check-in procedure, PPE requirements, Project Supervisor's phone number, street address and intersection)	
ARRIVAL	
Driver reports to Project Supervisor	
Confirm PPE	
Review Bill of Lading to confirm correct receiver and load	
Confirm site access path and storage site	
Confirm off-loading equipment and operator	
Confirm condition of access route, including overhead and on-ground obstacles	
Assign and brief flagmen / guides	
OFF-LOADING	
Examine the load in detail (refer to Bill of Lading, check description, number of units, condition)	
Reject load of components, if appropriate	
Review off-loading procedures, responsibilities and worksite rules	
Off-load and re-examine load condition	
Confirm exit path	
Sign Bill of Lading and release truck, under guide if appropriate	

10 – PETROLEUM HAZARDS AND PROCEDURES

10.1 Petroleum Products - General

The term means fuels such as gasoline, diesel, propane, aviation gasoline and jet fuels. It also includes lubricating oils and solvents.

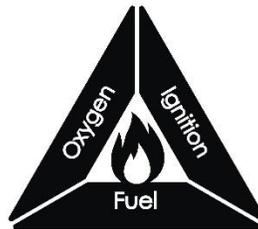
Petroleum products are derived from crude oil through the refining process.

Liquid petroleum products are made up of many individual chemical substances, all of them composed of various combinations of hydrogen and carbon molecules. Because of this, petroleum products are also referred to as "hydrocarbons".

Propane is a single type of hydrocarbon or petroleum product. Gasoline and diesel fuel are made up of many types.

10.2 Fires or Explosions

The "Fire triangle"



The 3 components necessary for a fire or explosion are

- Fuel vapours - often present at construction sites due to handling petroleum liquids, ventilating tanks, or handling contaminated soil.
- Oxygen - all around us in the air (about 20%).
- Ignition source - include open flames, electrical or static sparks, hot metal components, etc.

Fuel vapours and oxygen must be present in the right mixture in order to ignite. If the vapour concentration is too low or too high the mixture will be either too "thin" or "too rich". However, since vapour concentrations constantly change due to evaporation and air currents, it is very difficult to know when concentrations are safe and when they are hazardous.

To prevent fires

- Contain the vapours where possible, and
- Eliminate ignition sources in all vapour areas.

10.3 Asphyxiation

The vapours are inhaled and prevent your body from getting the oxygen you need to live. First you quickly pass out. Usually you will fall to the ground where vapours are thickest. Death can come quickly if you are not rescued immediately. Most petroleum vapours are heavier than air, and they tend to accumulate in low areas such as excavations and ditches. Natural gas is an exception and is lighter than air.

10.4 Long Term Health Impacts

Breathing petroleum vapours frequently over a long period of time can cause significant health problems. One type of vapour called benzene is particularly hazardous and has been linked with leukemia, a type of blood cancer. Avoid breathing vapours whenever possible by staying up wind, keeping your head high, and by wearing an approved respirator when required.

10.5 Eye Irritation

Petroleum splashed in the eyes should be rinsed out thoroughly and immediately with water to avoid irritation. See MSDS for additional information.

10.6 Skin Irritation

Petroleum on the skin can cause severe irritation if not washed off immediately. Use soap and cool water, as hot water causes pores to open and petroleum enters the pores.

10.7 Static

A static charge is created whenever there is friction. It can be two materials being rubbed together, or pulled apart. It is also produced by friction and turbulence as liquids flow through piping systems, especially filters.

Droplets of fuel, steam or water sprayed through air also become charged.

If static is allowed to keep building up on an object, and another object with a different charge approaches it, a spark can jump from one object to the other. If oxygen (air) and fuel vapours are also present, an ignition can occur.

10.8 Controlling the Static Hazard

If possible reduce the production of static by

- Slow flow rates for pumping petroleum
- Don't use sprays of water, steam, or fuel
- Avoid removing clothing in a vapour situation
- Prevent static build up by bonding and grounding when vapours may be present.

10.9 Bonding and Grounding

- "Bonding" means that a conductor such as a wire connects two or more objects. The charge from one object is automatically shared with the other connected objects so that they all have the same charge. Therefore no spark can jump between objects.
- "Grounding" means that a conductor such as a wire connects one or more objects to the earth. Any charge on the object goes immediately to the ground, and the object remains neutral. Often several objects will be bonded together, and one of them will also be grounded. This results in all of the objects being effectively grounded. Caution: Never attach or remove bonding or grounding cables in a vapour area, in case an unexpected spark occurs. Always make and break the connections away from the vapour area, or before or after the vapours are present.

11 – SUBSTANCE ABUSE POLICY

11.1 POLICY STATEMENT

MCL is committed as a matter of policy to having a workforce and workplace, that is free from unauthorized, prohibited, illegal or controlled substances including alcohol. Involvement with substances of abuse does compromise employee safety, public safety, environmental safety, job performance as well as employee health and safety. The Company expects employees to perform their duties safely and efficiently. The Company encourages employees who have a substance abuse problem to seek assistance. Accordingly, as a term and condition of employment and/or the privilege of entering onto or remaining on Company premises or performing Company work, it is important to note the following:

1. All employees must be fit for duty and in a condition to carry out their assignments and responsibilities. It is therefore a violation of this Policy for employees to work or to be on Company premises or assignment while under the influence of alcohol or unauthorized, prohibited, illegal or controlled substances.
2. The consumption, use, manufacture, dispensation, possession, distribution, promotion, provision, purchase, sale, transportation, concealment, transfer or storage of unauthorized, prohibited, illegal or controlled substances and/or substance-related paraphernalia while performing Company work, on Company assignment or on Company premises, is strictly *prohibited*.
3. The Company's employees shall not attempt to destroy **or** tamper with drug-testing specimens or records or adulterate specimens,
4. It is the employees responsibility to make sure that when he/she is using a *prescription or over-the-counter* product (whether physician-approved or not) that these products do not affect work performance by altering the mind, mood, behaviour, emotions, reasoning performance or physical job functions. Prescriptions and over-the-counter products are to be kept in the original container clearly marked with all pertinent information about usage, date, employee's name, prescribing physician's name and prescription number. They are to be used in a manner consistent with the instructions of the prescribing physician or as documented in the manufacturer's instructions.
5. An employee whose off-duty involvement with unauthorized, prohibited, illegal or controlled substances becomes known to the Company may be considered to be in violation of the policy depending on any adverse effect the employee's actions may have on the Company, including its reputation.
6. Any suspicion of unauthorized, prohibited, and illegal or controlled substances or paraphernalia on company property may be turned over to appropriate law *enforcement* authorities *in lieu of searches*.
7. All contractors, visitors, vendors, consultants or other individuals working on company property or assignment must comply with this Policy. While the Company has no direct control or direct interest in the personal actions or discipline of contractor employees or any outside vendors, these persons can affect the Company's employees, property and company reputation. Any contractor employee, consultant or vendor found or suspected to be in violation of this Policy will be dealt with through the appropriate contractor management and will be denied access to the job site or work assignment by the Company. Visitors found or suspected to be in violation of this Policy will also be denied access-to company property.
8. Some violations of this Policy may result in disciplinary action up to and including termination of employment.

11.2 APPLICATION

This policy applies to all new or existing employees in safety sensitive positions on the effective date of this policy and prohibits them from engaging in activity that would *contradict* the goals of this Policy.

11.3 SUBSTANCE TESTING

REASONABLE SUSPICION

Positions within the Company where impairment clearly impacts the ability of an employee to safely complete their duties and there is a reasonable cause, suspicion or belief that an individual employee may be using or abusing unauthorized, prohibited, illegal or controlled substances or when job performance appears to have changed or become erratic or impaired they may be subject to substance testing for reasonable cause, suspicion or belief.

POST INCIDENT /ACCIDENT TESTING

Any employee may be subject to substance testing after a significant incident or safety violation involving the employee. This will be done whether or not the use or abuse of substances is apparent in the circumstances. Testing will be conducted as soon as reasonably practicable following the incident. If the testing does not occur within four (4) hours after the incident it shall be documented with a valid reason for the delay. This is under the sole discretion of the supervisor on site at the time of the incident.

RETURN TO WORK

Any employee who has previously failed any drug or alcohol test administered by this Company and who has undergone a counselling or a rehabilitation program for substance or alcohol abuse, and has successfully completed such a program to the satisfaction of the substance abuse professional, and who then returns to employment with the Company shall be subject to a return-to-work test and follow-up testing as required.

STATUTORY OR CONTRACTUAL TESTING

Employee will be tested as and when required by contractual, federal or provincial statutes, regulations or orders.

11.4 TESTING PROCEDURES AND CONFIRMATION TESTS

Test samples will be collected by qualified staff, reviewed by a Medical Review Officer/Physician and kept confidential with only the interpretation of the results released to the appropriate Company contact. Approved methods of Immunoassay screening testing with GC/MS confirmation of all positive tests by a designated, accredited and approved laboratory will be completed. A consent form will be obtained and stored in the employee's file.

SUBSTANCES AND THRESHOLD DETECTION LEVELS

SUBSTANCE	IMMUNOASSAY SCREENING
Amphetamines	-1000 ng/mL
Opiates	-300 ng/mL
Cannabinoids (THC Metabolites)	-50 ng/mL
Cocaine	-300 ng/mL
Phencyclidine (PCP)	-25 ng/mL

Alcohol	-0.04 gms%
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11.5 CONSEQUENCES OF POSITIVE TEST RESULT

The Company will not permit any employee to perform safety-sensitive functions, if it has been determined that an employee has violated this Policy. When the employee violates this Policy, he/she will be reinstated after referral, evaluation and treatment are completed to the satisfaction of the Company and a negative substance test and/or negative alcohol test at the expense of the employee. Employees may refuse to participate in this policy and the refusal shall be considered a refusal to accept the Company's terms and conditions of employment and thereby resign his/her employment.

11.6 COUNSELING AND REHABILITATION

Employees who voluntarily admit to having a substance problem or test positive are eligible for a one-time leave to enrol in a Company approved rehabilitation program, providing there are no other violations of this Policy and providing that the employee has not previously been through a rehabilitation program while employed by the Company. This one-time Crisis Suspension Leave should be no longer than thirty calendar days without pay but could be less than thirty days depending on a determination of the treatment facility. As a term and condition of continued employment, employees who participate in an approved rehabilitation program must provide proof of successful completion of their rehabilitation and a negative test (return-to-work) and follow-up substance tests as recommended by the substance abuse professional in order to continue work.

11.7. COMPANY APPROVED FUNCTIONS

Authorization of the storage of alcoholic beverages on company premises is recognized. The use of alcohol at company-approved functions does not relieve employees from responsibility for maintaining sobriety and control over their actions and behaviour so as not to represent a hazard or danger to themselves, other employees, the general public or the Company's reputation.

11.8. DISTRIBUTION

Each employee will be asked to review this policy and invited to sign an acknowledge/consent making this „Policy“ a Terms and Condition of their employment with the Company. Employees are invited to contact their immediate supervisor or manager if they do not believe that they can comply with the Policy and that they refrain from providing any further duties to the Company.

11.9 GLOSSARY OF TERMS

The following terms, which are used in the Policy, have generally accepted meanings. The definitions and examples below are illustrative. They are not intended to be, nor should they be, construed as exclusive of any other consistent interpretation.

"Abuse" The use of any substance in a manner that may tend to incapacitate, impair or influence an individual, or the use of any substance in a manner that deviates from the medical or legal norms or from Company rules, policies or expectations. This includes recreational use of a substance, as well as dependence or addiction to a substance. It also includes misuse of substances that are permitted legally authorized or uncontrolled.

"Active employee" All regular, temporary, intermittent, hourly, salaried, supervisory, management and executive-level personnel on the payroll of the Company.

"Approved rehabilitation program" A substance rehabilitation and maintenance program that is recognized and meets the criteria established by the Company.

"Confidentiality" Personal information on employees testing and rehabilitation will be released by the Medical Services only on a need-to-know basis or as required by law to the appropriate Company contacts.

"Company premises" Includes all property, offices, facilities, land, parking lots, buildings, structures, fixtures, installations, areas, boats, vessels, aircraft, automobiles, trucks and any other vehicles, equipment or property, whether owned, leased, used or controlled by a Company entity. Also includes an employee's private mode of transportation while used for Company work or located on Company premises.

"Company work" Includes all authorized work, job assignments, or job-related activities performed for, or on behalf of, the Company.

"Confirmation test" In the case of drug testing, a second analytical procedure to identify the presence of a specific drug or metabolite that is independent of the initial test, which uses a different technique and chemical principle from that of the initial test.

"contractor", "vendor", "consultant", "visitor" or "other individual" all persons under the direction of or under contract to an independent contractor or subcontractor, including the owner or manager of the independent operations, and also including suppliers, visitors and other persons working on Company premises or performing Company work.

"Detectable" or "detection level" the level at which a substance(s) will be detected in the screening test.

"Drug panel 5" An approved drug test protocol which tests for the presence of PCP, cocaine, amphetamines, marijuana and opiates.

"Final test results" Test results after all testing under the Policy has been completed.

"Paraphernalia" Equipment, apparatus or other devices used in conjunction or associated with substances.

"Possession" Means to have either in or on the employee's person, personal effects, motor vehicles or areas substantially entrusted to the control of the employee.

"Safety sensitive position" Means a position having duties, as defined by the employer, involving responsibilities affecting such matters as health, personal safety, safety of other people or of the environment, or other responsibilities requiring a high degree of trust and confidence or working in isolation with limited supervision.

"Substances of abuse" Alcohol, drug(s), chemical(s) or other substances. These terms may be generally used interchangeably and the term „substance“ may be used to refer to alcohol, drugs, chemicals and substances in the Policy or in communications relating thereto.

12 – SAFETY MEETINGS AND COMMUNICATIONS

12.1 Pre-Job Safety Meeting

Before each project commences, a pre-job, or kick-off safety meeting is required. The Project Supervisor conducts the meeting assisted by the Project Manager. Attendees are

- Representatives of each sub trade that will be present on the site in the early stages
- MCL employees who are assigned to work on the site
- Typically a client representative
- Occasionally a MCL officer

The intent of the meeting is to

- Emphasize MCL and Client safety policies

- Communicate the general and site - specific safety rules
- Identify special safety issues and precautions
- Address concerns and questions from attendees
- Gain commitment from all participants

The agenda typically includes

- Introduction of participants
- Project overview and schedule
- Emergency procedures
- Safe Work Permits and Critical Tasks
- Incident/accident/near miss reporting requirements and procedures
- General safety rules
- Site-specific safety rules
- Questions and action items

12.2 MCL Safety Board

A large safety board is provided in each project where MCL acts as the General Contractor to display safety-related information such as

- MCL Safety Policy statement
- Client Safety Policy statement
- The Emergency response plan
- Safe Work Permits (for work in progress)
- OHS Regulations
- Loss Control Committee communications
- Safety bulletins from Client, WSIB, or MCL

12.3 Tool Box Meetings

Once per week throughout the project, the Project Supervisor will conduct a brief "Tool Box" safety meeting involving all on-site workers. Minutes will be recorded and provided to the Project Manager. The intent of the meetings is to

- Reinforce the safety message
- Identify specific concerns by the workers
- Identify specific concerns by the Project Supervisor
- Identify and implement improvements and corrective action
- Discuss up-coming activities

12.4 Mid – Project Safety Meeting

MCL requires a mid-project safety meeting for each project. The process and content is the same as for the pre-job meeting. The intent is to

- Refresh the commitment for all parties
- Include sub trades that were not involved at the pre-job stage

13 – REQUIRED FOR THE SAFETY BOARD

1. First Aid Kit
2. Eye Wash Station w/mount
3. Map to closest hospital
4. Occupational Health and Safety Act and Regulations for Construction Projects (Green Book) attached to chain
5. Hospital forms- 6, 7 and return to work forms (WSIB)
6. Safe Work Permits if applicable
7. MCL Safety Policy
8. "In Case of Injury at Work" poster
9. Emergency numbers form