



PROVIDUS

CONTRACT AND PERMANENT
ATTORNEYS • PARALEGALS

Health and Safety Manual

Effective August 15, 2002

Chapter 1

Injury and Illness Prevention Program

Written Plan

Every employer should have a written Injury and Illness Prevention plan. This is our plan. Please read it carefully. While no plan can guarantee an accident free work place, following the safety procedures set forth in this manual will significantly reduce the risk of danger to you and your co-workers.

Introduction to Our Program

State and federal law, as well as Providus policy, make the safety and health of our employees the first consideration in operating our business. Safety and health in our business must be a part of every operation, and every employee's responsibility at all levels. It is the intent of Providus to comply with all laws concerning the operation of the business and the health and safety of our employees and the public. To do this, we must constantly be aware of conditions in all work areas that can produce or lead to injuries. No employee is required to work at a job known to be unsafe or dangerous to their health. Your cooperation in detecting hazards, reporting dangerous conditions and controlling workplace hazards is a condition of employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct. Employees will not be disciplined or suffer any retaliation for reporting a safety violation in good faith.

Safety First Priority

The personal safety and health of each employee of Providus is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity. To the greatest degree possible, management will provide all mechanical and physical protection required for personal safety and health, but our employees must bear primary responsibility for working safely. A little common sense and caution can prevent most accidents from occurring.

Individual Cooperation Necessary

Providus maintains a safety and health program conforming to the best practices of our field. To be successful, such a program must embody proper attitudes towards injury and illness prevention on the part of supervisors and employees. It requires the cooperation in all safety and health matters, not only of the employer and employee, but between the employee and all co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved. Safety is no accident; think safety and the job will be safer.

Safety Program Goals

The objective of Providus is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing the best experience of similar operations by others. Our goal is zero accidents and injuries.

Safety Policy Statement

It is the policy of Providus that accident prevention shall be considered of primary importance in all phases of operation and administration. It is the intention of Providus' management to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees.

The prevention of accidents is an objective affecting all levels of our Providus and its operations. It is, therefore, a basic requirement that each supervisor make the safety of all employees an integral part of his or her regular management function. It is equally the duty of each employee to accept and follow established safety regulations and procedures.

Every effort will be made to provide adequate training to employees. However, if an employee is ever in doubt about how to do a job or task safely, it is his or her duty to ask a qualified person for assistance. Employees are expected to assist management in accident prevention activities. Unsafe conditions must be reported immediately. Fellow employees that need help should be assisted. Everyone is responsible for the housekeeping duties that pertain to their jobs.

Every injury that occurs on the job, even a slight cut or strain, must be reported to management and/or the Responsible Safety Officer as soon as possible. Under no circumstances, except emergency trips to the hospital, should an employee leave the work site without reporting an injury. When you have an accident, everyone is hurt. Please work safely. Safety is everyone's business.

Safety Rules for All Employees

It is the policy of Providus that everything possible will be done to protect you from accidents, injuries and/or occupational disease while on the job. Safety is a cooperative undertaking requiring an ever-present safety consciousness on the part of every employee. If an employee is injured, positive action must be taken promptly to see that the employee receives adequate treatment. No one likes to see a fellow employee injured by an accident. Therefore, all operations must be planned to prevent accidents. To carry out this policy, the following rules will apply:

1. All employees shall follow the safe practices and rules contained in this manual and such other rules and practices communicated on the job. All employees shall report all unsafe conditions or practices to the proper authority, including the supervision on the project, and, if corrective action is not taken immediately, a governmental authority with proper jurisdiction over such practices.

2. Your supervisor shall be responsible for implementing these policies by insisting that employees observe and obey all rules and regulations necessary to maintain a safe work place and safe work habits and practices.
3. Good housekeeping must be practiced at all times in the work area. Clean up all waste and eliminate any dangers in the work area.
4. Suitable clothing and footwear must be worn at all times. Personal protection equipment (hardhats, respirators, eye protection) will be worn whenever needed.
5. Anyone under the influence of intoxicating liquor or drugs, including prescription drugs which might impair motor skills and judgment, shall not be allowed on the job.
6. Horseplay, scuffling, and other acts which tend to have an adverse influence on safety or well-being of other employees are prohibited.
7. Work shall be well planned and supervised to avoid injuries in the handling of heavy materials and while using equipment.
8. No one shall be permitted to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might expose the employee or others to injury.
9. There will be no consumption of liquor or beer on the job.
10. Employees shall not handle or tamper with any electrical equipment, machinery, or air or water lines.
11. All injuries should be reported to a supervisor so that arrangements can be made for medical or first aid treatment.
12. When lifting heavy objects, use the large muscles of the leg instead of the smaller muscles of the back.
13. Do not throw things, especially material and equipment. Dispose of all waste properly and carefully.
14. Do not wear shoes with thin or torn soles.

Agreement to Participate

Every employer is required to provide a safe and healthful workplace. Providus is committed to fulfilling this requirement. A safe and healthful workplace is one of the highest priorities of Providus.

The information in this manual constitutes a written injury and illness prevention program. While Providus cannot anticipate every workplace hazard, the following general principals should guide your conduct. To be safe, you must never stop being safety conscious.

Study the guidelines contained in this manual. Discuss the workplace situation with your supervisor. Read all posters and warnings. Listen to instructions carefully. Follow the Code of Safe Work Place Practices contained herein. Participate in accident investigations as requested. Accept responsibility for the safety of others. Maintain all required documentation.

By signing the acknowledgement at the end of this handbook, each employee promises to read and implement this injury and illness prevention program. If you don't understand any policy, please ask your supervisor.

Training

Employee safety training is another requirement of an effective injury and illness prevention program. While Providus believes in skills training, we also want to emphasize safety training. All employees should start the safety training by reading this manual and discussing any problems or safety concerns with your direct supervisor. You may wish to make notes in the margins of this manual where it applies to your work.

Employee Responsibility

Safety is a two-way street. Providus can preach safety, but only employees can practice safety.

Remember, the following general rules apply in all situations:

- a) no employee should undertake a job that appears to be unsafe.
- b) no employee is expected to undertake a job until he/she has received adequate safety instructions, and is authorized to perform the task.
- c) no employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with these chemicals safely.
- d) mechanical safeguards must be kept in place.
- e) employees must report any unsafe conditions to the job site supervisor and the Responsible Safety Officer.
- f) any work-related injury or illness must be reported to management at once.
- g) personal protective equipment must be used when and where required. All such equipment must be properly maintained.

Communication

Employers should communicate to employees their commitment to safety and to make sure that employees are familiar with the elements of the safety program. Providus communicates with its employees orally, in the form of directions and statements from your supervisor, written, in the form of directives and this manual, and by example. If you see a supervisor or manager do something unsafe, please tell that person. We sometimes forget actions speak louder than words.

Accident Prevention Policy Posting

A copy of this manual will be posted in the work area.

It is the policy of Providus to provide a safe and clean workplace and to maintain sound operating practices. Concentrated efforts shall produce safe working conditions and result in efficient, productive operations. Safeguarding the health and welfare of our employees cannot be stressed enough.

Accident prevention is the responsibility of all of us. Department heads and supervisors at all levels shall be responsible for continuous efforts directed toward the prevention of accidents. Employees are responsible for performing their jobs in a safe manner.

The observance of safe and clean work practices, coupled with ongoing compliance of all established safety standards and codes, will reduce accidents and make Providus a better place to work.

Each employee has a personal responsibility to prevent accidents. You have a responsibility to your family, to your fellow workers and to Providus. You will be expected to observe safe practice rules and instructions relating to the efficient handling of your work.

Your responsibilities include the following:

- Incorporate safety into every job procedure. No job is done efficiently unless it has been done safely.
- Know and obey safe practice rules.
- Know that disciplinary action may result from a violation of the safety rules.
- Report all injuries immediately, no matter how slight the injury may be.
- Caution fellow workers when they perform unsafe acts.
- Don't take chances.
- Ask questions when there is any doubt concerning safety.
- Don't tamper with anything you do not understand.
- Report all unsafe conditions or equipment to your supervisor immediately.

Hazard Identification & Abatement

This written safety and health plan sets out a system for identifying workplace hazards and correcting them in a timely fashion. Please review it carefully with your supervisor. Remember, safety is everyone's responsibility.

Safety Audits

The best method to establish a safer workplace is to study past accidents and worker compensation complaints. By focusing on past injuries, Providus hopes to avoid similar problems in the future. Therefore, whenever there is an accident, and in many cases upon review of past accidents, you may be requested to participate in a safety audit interview. During the interview, there will be questions about the nature of the investigation and the workplace safety related to the incident. Please answer these questions honestly and completely. Also, please volunteer any personal observations and/or suggestions for improved workplace safety.

In addition to historical information, workplace safety depends on workplace observation. Your supervisor is responsible for inspecting your working area daily before and while you are working, but this does not mean you are no longer responsible for inspecting the workplace also. Each day, before you begin work, inspect the area for any dangerous conditions. Inform your supervisor of anything significant, so other employees and guests are advised. You may also be given written communications regarding unsafe conditions or serious concealed dangers. Review this communication carefully and adjust your workplace behavior to avoid any danger or hazards. If you are unclear or unsure of the significance of this written communication, contact your supervisor and review your planned actions before starting to work. It is better to wait and check, then to go ahead and possibly cause an injury to yourself and others.

Managers must provide written notice to employees of any serious concealed dangers of which they have actual knowledge. In addition to providing written notice of all serious concealed dangers to employees, managers are required to report serious concealed dangers to either OSHA or an appropriate administrative agency within fifteen days, or immediately if such danger would cause imminent harm, unless the danger is abated.

Merely identifying the problem is not sufficient. The danger must be reported to the appropriate supervisor and the Responsible Safety Officer, who then will correct the problem. If the danger cannot be corrected, then all employees will be warned to take protective action so that the danger will not result in any injuries.

Accident Investigation

A primary tool used by Providus to identify the areas responsible for accidents is a thorough and properly completed accident investigation. The results of each investigation will be reduced to writing and submitted for review by management and Providus' insurance risk management advisors, and, if the accident resulted in serious injury, to Providus attorneys. If the accident resulted in serious injury, the procedure will be directed by the attorneys to provide the most reliable evidence or description legally permissible. All investigations pursuant to the directions of

legal counsel will be protected by all applicable privileges, if any. The attorneys will provide more detail on this topic during the investigation.

If a formal police report or other official investigation is conducted by any government agency, get the name and badge number of the official, or a business card, and find out when a copy of the official report will be available to the public. If you are requested to make a formal statement, you have the right to have Providus' lawyer attend at no cost to you.

A satisfactory accident report will answer the following questions:

1. What happened? The investigation report should begin by describing the accident, the injury sustained, the eyewitnesses, the date, time and location of the incident and the date and time of the report. Remember: who, what, when, where and how are the questions that the report must answer.
2. Why did the accident occur? The ultimate cause of the accident may not be known for several days after all the data are analyzed. However, if an obvious cause suggests itself, include your conclusions as a hypothesis at the time you give your information to the person in charge of the investigation.
3. What should be done? Once a report determines the cause of the accident, it should suggest a method for avoiding future accidents of a similar character. This is a decision by the Responsible Safety Officer and the supervisor on the project, as well as top management. Once a solution has been adopted, it is everyone's responsibility to implement it.
4. What has been done? A follow up report will be issued after a reasonable amount of time to determine if the suggested solution was implemented and, if so, whether the likelihood of accident has been reduced.

General Statement on Safety

Each employee has an individual responsibility to prevent accidents. It is to the benefit of all employees and Providus that you report any situation or condition you believe may present a safety hazard, including any known or concealed dangers in your work area. Providus encourages you to report your concern either to your immediate supervisor or to a member of Providus' Senior Management. The supervisor or Providus' Senior Management will take immediate action to investigate the matter.

Safety Equipment

Proper safety equipment is necessary for your protection.

Use all safeguards, safety appliances, or devices furnished for your protection and comply with all regulations that may concern or affect your safety. Wear your gear properly—all snaps and straps fastened, cuffs not cut or rolled.

Your supervisor will advise you as to what protective equipment, if any, is required for your job.

No jewelry shall be worn around power equipment.

Smoking and Fire Safety

Fire is one of the worst enemies of any facility. Learn the location of the fire extinguishers. Learn how to use them.

You can help prevent fires by observing the smoking rules:

- Smoking is not allowed on the site, except in designated areas.
- Smoking is not permitted in rest rooms.
- If you are not sure about where you may smoke, ask the supervisor.

Reporting

All serious accidents must be reported to OSHA. In cases of hospitalization or death, a full investigation with copies to governmental authorities will be required. In less serious cases, the investigation report must be presented to Providus for disclosure to its insurance carrier and for remedial action at the work site.

Chapter 2

General Code of Safe Work Practices

General Fire Safety

The Fire Department is well acquainted with our facility, its location and specific hazards.

All fire doors and shutters must be maintained in good operating condition. Fire doors and shutters should be unobstructed and protected against obstructions, including their counterweights. Fire door and shutter fusible links must be in place. All automatic sprinkler water control valves, if any, air and water pressures should be checked routinely. The maintenance of automatic sprinkler systems is assigned to the Responsible Safety Officer. Sprinkler heads should be protected by metal guards if they could possibly be exposed to damage. Proper clearance must be maintained below sprinkler heads.

Portable fire extinguishers are provided in adequate number and type and are located throughout the facility. Fire extinguishers are mounted in readily accessible locations. Fire extinguishers are recharged regularly and the date of last inspection noted on their tags. All employees are

periodically instructed in the use of extinguishers and fire protection procedures. Notify the Responsible Safety Officer of any damage to fire protection equipment.

Electrical

The workplace will be aware of the OSHA Electrical Safety Orders and will comply with the same. Employees will be required to report any hazard to life or property that is observed in connection with a job, electrical equipment or lines.

Equipment such as electrical tools or appliance must be grounded or of the double insulated type. Extension cords being used must have a grounding conductor. The workplace supervisor must be aware if multiple plug adaptors are prohibited.

Ergonomics

With the introduction of computers into the workplace, new areas of physical debilitation have been recognized. These new potential hazards have required a redesigning of both the workplace and how employees work. A set of standards will be developed and practiced with this new technology.

Safety Posters

Providus is required to post certain employment related information. The required information is maintained in the common area where employees can find the following required posters:

Various state and federal orders regulating the Wages, Hours and Working Conditions in certain industries.

Pay Day Notice

Anti-Discrimination Poster

Equal Employment Opportunity is the Law (EEOC form)

OSHA Safety and Health Protection on the Job

Notice of Workers Compensation Carrier

Notice to Employees: Unemployment Insurance and Disability Insurance

Notice: Employee Polygraph Protection Act (form WH 1462)

Access to Medical and Exposure Records

Notice to Employees: Time Off to Vote

In addition to the above listed notices, a copy of this injury prevention program, a log and summary of Occupational Injuries and Illnesses, a copy of Providus' code of Safe Work Practices and a Fire Prevention and Evacuation Plan will be posted.

In addition to these required safety postings, emergency numbers are maintained in the corporate office.

In most cases of real emergency call 911. State your name, the nature of the emergency, and exact location of the injury. Answer all questions completely. Do NOT use 911 for routine calls to police or fire departments.

Licenses and Permits

In addition to other postings required by law, Providus maintains a copy of all necessary business licenses, permits, and notices required by the National Labor Relations Board or other governmental bodies, notices of citations during abatement periods, and other required information which are posted during the appropriate times in the common area.

Work Environment, General

Work sites must be clean and orderly. Work surfaces must be kept dry or appropriate means taken to assure the surfaces are slip-resistant. Spills must be cleaned up immediately

Walkways

All aisles and passageways must be kept clear. Also, aisles and passageways should be clearly marked. Wet surfaces must be covered with non-slip material and all holes properly covered or marked with warning guards. All spills must be cleaned up immediately, and a caution sign placed on all wet or drying surfaces.

If an employee is aware of any breach of these standards, please inform the workplace supervisor.

Work Area, General

Fire extinguishers must remain accessible at all times. Means of egress should be kept unblocked, well-lighted and unlocked during work hours. Excessive combustibles (paper) may be not stored in work areas.

Aisles and hallways must kept clear at all times. Designated employees have been trained to respond to a fire or other emergency. Workplaces are to be kept free of debris, floor storage and electrical cords.

Adequate aisle space is to be maintained. File cabinet drawers should be opened one at a time and closed when work is finished.

Proper lifting techniques are to be used by employees to avoid over exertion and strain when carrying loads. No alcohol or any intoxicating substance may be consumed prior to or during work.

Driving

Drive safely. If vehicles are used during the work day, seat belts and shoulder harnesses are to be worn at all times. Vehicles must be locked when unattended to avoid criminal misconduct. Do not exceed the speed limit. Vehicles must be parked in legal spaces and must not obstruct traffic. Defensive driving must be practiced by all employees. Employees should park their vehicles in well-lighted areas at/or near entrances to avoid criminal misconduct.

Cleanliness

All work sites must be clean and orderly. All work surfaces must be kept dry or appropriate means taken to assure that surfaces are slip-resistant. All spill materials or liquids should be cleaned up immediately and combustible scrap, debris and waste stored safely and removed from the work site promptly.

First Aid Kits

First-aid kits and required contents are maintained in a serviceable condition. Unit-type kits have all items in the first-aid kit individually wrapped, sealed, and packaged in comparable sized packages. The commercial or cabinet-type kits do not require all items to be individually wrapped and sealed, but only those which must be kept sterile. Items such as scissors, tweezers, tubes of ointments with caps, or rolls of adhesive tape, need not be individually wrapped, sealed, or disposed of after a single use or application. Individual packaging and sealing shall be required only for those items which must be kept sterile in a first-aid kit.

First-aid kits shall contain at least the following items:

10 Package Kit:

- 1 Pkg. Adhesive bandages, 1" (16 per pkg.)
- 1 Pkg. Bandage compress, 4" (1 per pkg.)
- 1 Pkg. Scissors* and tweezers (1 each per pkg.)
- 1 Pkg. Triangular bandage, 40" (1 per pkg.)
- 1 Pkg. Antiseptic soap or pads (3 per pkg.)

16 Package Kit:

- 1 Pkg. Absorbent gauze, 24" x 72" (1 per pkg.)

- 1 Pkg. Adhesive bandages, 1" (16 per pkg.)
- 2 Pkgs. Bandage compresses, 4" (1 per pkg.)
- 1 Pkg. Eye dressing (1 per pkg.)
- 1 Pkg. Scissors* and tweezers (1 each per pkg.)
- 2 Pkgs. Triangular bandages, 40" (1 per pkg.)
- 1 Pkg. Antiseptic soap or pads (3 per pkg.)

24 Package Kit:

- 2 Pkgs. Absorbent gauze, 24" x 72" (1 per pkg.)
- 2 Pkgs. Adhesive bandages, 1" (16 per pkg.)
- 2 Pkgs. Bandage compresses, 4" (1 per pkg.)
- 1 Pkg. Eye dressing (1 per pkg.)
- 1 Pkg. Scissors* and tweezers (1 each per pkg.)
- 6 Pkgs. Triangular bandages (1 per pkg.)
- 1 Pkg. Antiseptic soap or pads (3 per pkg.)

36 Package Kit:

- 4 Pkgs. Absorbent gauze, 24" x 72" (1 per pkg.)
- 2 Pkgs. Adhesive bandages, 1" (16 per pkg.)
- 5 Pkgs. Bandage compresses, 4" (1 per pkg.)
- 2 Pkgs. Eye dressing (1 per pkg.)
- 1 Pkg. Scissors* and tweezers (1 each per pkg.)
- 8 Pkgs. Triangular bandages, 40" (1 per pkg.)
- 1 Pkg. Antiseptic soap or pads (3 per pkg.)

*Scissors shall be capable of cutting 2 layers of 15 oz. cotton cloth or its equivalent.

The first-aid kits are maintained at the ten, sixteen, twenty-four or thirty-six package level.

Chapter 3

Electrical Safety

Policy

It is the policy of Providus to take every reasonable precaution in the performance of work to protect the health and safety of employees and the public and to minimize the probability of damage to property. The electrical safety requirements contained in this chapter are regulations set forth by Providus.

Employee Responsibility

All Providus personnel are responsible for all aspects of safety within their own groups. The Responsible Safety Officer is responsible for providing information, instruction, and assistance, as appropriate, concerning Providus' electrical safety requirements and procedures.

Individual employees are responsible for their own and their co-workers' safety.

This means:

Become acquainted with all potential hazards in the area in which they work.

Learn and follow the appropriate standards, procedures, and hazard-control methods.

Never undertake a potentially hazardous operation without consulting with appropriate supervision.

Stop any operation you believe to be hazardous.

Notify a supervisor of any condition or behavior that poses a potential hazard.

Wear and use appropriate protective equipment.

Immediately report any occupational injury or illness to the Responsible Safety Officer, any on site Medical Services Department and the appropriate supervisor.

Each employee acting in a supervisory capacity has specific safety responsibilities. These include:

Developing an attitude and awareness of safety in the people supervised and seeing that individual safety responsibilities are fully carried out.

Maintaining a safe work environment and taking corrective action on any potentially hazardous operation or condition.

Ensuring that the personnel he/she directs are knowledgeable and trained in the tasks they are asked to perform.

Ensuring that safe conditions prevail in the area and that everyone is properly informed of the area's safety regulations and procedures.

Ensuring that contract personnel are properly protected by means of instructions, signs, barriers, or other appropriate resources.

Ensuring that no employee assigned to potentially hazardous work appears to be fatigued, ill, emotionally disturbed, or under the influence of alcohol or drugs (prescription, over the counter, medicinal or otherwise).

Management at every level has the responsibility for maintaining the work environment at a minimal level of risk throughout all areas of control.

Each manager:

Is responsible for being aware of all potentially hazardous activities within the area of responsibility.

May assign responsibility or delegate authority for performance of any function, but remains accountable to higher management for any oversight or error that leads to injury, illness, or damage to property.

Chapter 4

Emergencies

Organization

Providus requires that during every emergency an organized effort be made to protect personnel from further injury and to minimize property damage.

All of Providus' resources can be made available to respond to an emergency. Each supervisor must know what to do during an emergency in his or her area and must be certain that his or her employees understand their roles.

Supervisors Responsibilities

During an emergency, the supervisor must:

- Ensure that those under his or her supervision are familiar with the plan for the building, particularly the recommended exit routes and how to report an emergency.

- Render assistance to the person in charge during an emergency, as required.

- Know the location and use of all safety equipment on his or her floor.

- Keep employees from reentering an evacuated area until reentry is safe.

No Loitering Policy: Employees not involved in the emergency must stay away from the scene and follow the instructions issued over the public address system or directly from the person in charge. The sounding of a fire bell means immediate evacuation by the nearest exit. Employees must not reenter an area that they have evacuated until notified that it is safe to return.

Employee Responsibilities

Employees, other than emergency-response groups, involved in any emergency greater than a minor incident are expected to act as follows:

- If there is threat of further injury or further exposure to hazardous material, remove all injured persons, if possible, and leave the immediate vicinity. If there is no threat of further injury or exposure, leave seriously injured personnel where they are.

Report the emergency immediately by phone. State what happened, the specific location, whether anyone was injured, and your name and phone number.

Proceed with first aid or attempt to control the incident only if you can do so safely and have been trained in first aid or the emergency response necessary to control the incident.

Show the ranking emergency-response officer where the incident occurred, inform him or her of the hazards associated with the area, provide any other information that will help avoid injuries, and do as he or she requests.

Chapter 5

Fire Safety

Introduction

Policy and planning for fire safety at Providus takes into account the special fire hazards for specific operating areas, the protection of high-value property, and the safety of employees. These ends are met by:

Non-combustible or fire-rated materials and construction practices suitable to the assigned uses of buildings and facilities.

Alarm systems and automatic extinguishing systems.

Availability of suitable hand extinguishers and local hose lines for use before firefighters arrive.

Access to professional fire department, always staffed and trained in the control of emergencies that could occur at Providus.

The Fire Department makes the initial response to all requests for emergency aid received on the emergency telephone number, 911. This chapter covers the fire safety responsibilities of employees and supervisors and sets forth the fire safety rules and procedures.

Fire Department

The Fire Department is responsible for protecting people and property from fires, explosions, and other hazards through prevention and expeditious control of such events. In addition, the Fire Department provides first-response rescue and transportation services in medical emergencies.

The Fire Department's inspection staff is responsible for ensuring compliance with fire safety and protection requirements and for reviewing all plans and procedures for compliance with these requirements; for inspecting and testing automatic fire protection and alarm systems and ensuring their maintenance and repair; for conducting fire safety and protection inspections; and for providing fire prevention recommendations. Other responsibilities include training employees in fire safety equipment, practices, and procedures.

All these fire protection and response functions are performed in conformance with OSHA regulations, State law, Providus policies, and nationally recognized standards and guidelines for fire and life safety. The Fire Chief and the Fire Marshal have the authority to enforce applicable requirements of the Uniform Building Code; the Uniform Fire Code; National Fire Protection Association Codes (including the Life Safety Code), Standards, and Recommended Practices; and the fire protection provisions of OSHA Orders.

All employees must immediately report fires, smoke, or potential fire hazards to the Fire Department (dial 911).

All employees must conduct their operations in such a way as to minimize the possibility of fire. This means applying rules such as keeping combustibles separated from ignition sources, being careful about smoking, and avoiding needless accumulations of combustible materials.

Supervisors are responsible for keeping their operating areas safe from fire. The Responsible Safety Officer and the Fire Department will provide guidance and construction criteria with respect to fire and life safety as well as inspections. The provision and maintenance of fire detection systems and both automatic and manual fire extinguishing equipment is the responsibility of the Responsible Safety Officer. But the supervisor, who best knows the day-to-day nature of his/her operations, is responsible for notifying the Responsible Safety Officer of operations that change the degree of fire risk and will therefore require a change in the planned fire protection provisions.

Supervisor Responsibilities

Supervisors must ensure that their personnel are properly instructed regarding potential fire hazards involved in their work and around their workplaces, the proper precautions to minimize fires, and the procedures in case of fire. The local Fire Department and the Responsible Safety Officer also offer formal courses and training materials on fire prevention and response:

- Fire Safety

- Fire-Extinguisher Operation

- Self-Contained Breathing Apparatus

Class A Combustibles

Class A combustibles are common materials such as wood, paper, cloth, rubber, plastics, etc. Fires in any of these fuels can be extinguished with water as well as other agents specified for Class A fires. They are the most common fuels to be found in non-specialized operating areas of the work place such as offices.

Safe handling of Class A combustibles means:

Disposing of waste daily.

Keeping work area clean and free of fuel paths, which can spread a fire, once started.

Keeping combustibles away from accidental ignition sources such as hot plates, soldering irons, or other heat or spark-producing devices.

Keeping all rubbish, trash, or other waste in metal or metal-lined receptacles with tight-fitting covers when in or adjacent to buildings. (Exception: wastebaskets of metal or of other material and design approved for such use, which are emptied each day, need not be covered.)

Using safe ashtrays for disposal of smoking materials and making sure that the contents are extinguished and cold to the touch before emptying them into a safe receptacle.

Planning the use of combustibles in any operation so that excessive amounts need not be stored.

Storing paper stock in metal cabinets and rags in metal bins with automatically closing lids.

Making frequent inspections and checks for noncompliance with these rules in order to catch fires in the potential stage.

Class B Combustibles

Class B combustibles are flammable and combustible liquids (including oils, greases, tars, oil-base paints, lacquers) and flammable gases. Flammable aerosols (spray cans) are treated here. Cryogenic and pressurized flammable gases are treated elsewhere in this manual.

The use of water to extinguish Class B fires (by other than trained firefighters) can cause the burning liquid to spread carrying the fire with it. Flammable-liquid fires are usually best extinguished by excluding the air around the burning liquid. Generally, this is accomplished by using one of several approved types of fire-extinguishing agents, such as the following:

Carbon dioxide

ABC multipurpose dry chemical

Halon 1301 (used in built-in, total-flood systems)

Halon 1211 (used in portable extinguishers)

Fires involving flammable gases are usually controlled by eliminating the source of fuel, i.e., closing a valve.

Technically, flammable and combustible liquids do not burn. However, under appropriate conditions, they generate sufficient quantities of vapors to form ignitable vapor-air mixtures. As a general rule, the lower the flash point of a liquid, the greater the fire and explosion hazard. It should be noted that many flammable and combustible liquids also pose health hazards.

NOTE: The flash point of a liquid is the minimum temperature at which it gives off sufficient vapor to form an ignitable mixture with the air near the surface of the liquid or within the vessel used.

It is the responsibility of the user to ensure that all Class B combustibles are properly identified, labeled, handled, and stored. If assistance is required, contact the Responsible Safety Office. Safe handling of Class B combustibles means:

Using only approved containers, tanks, equipment, and apparatus for the storage, handling, and use of Class B combustibles.

Making sure that all containers are conspicuously and accurately labeled as to their contents.

Dispensing liquids from tanks, drums, barrels, or similar containers only through approved pumps taking suction from the top or through approved self-closing valves or faucets.

Storing, handling, and using Class B combustibles only in approved locations, where vapors cannot reach any source of ignition, including heating equipment, electrical equipment, oven flame, mechanical or electrical sparks, etc.

Never cleaning with flammable liquids within a building except in a closed machine approved for the purpose.

Never storing, handling, or using Class B combustibles in or near exists, stairways, or other areas normally used for egress.

In rooms or buildings, storing flammable liquids in excess of 10 gallons in approved storage cabinets or special rooms approved for the purpose.

Knowing the locations of the nearest portable fire extinguishers rated for Class B fires and how to use them.

Never smoking, welding, cutting, grinding, using an open flame or unsafe electrical appliances or equipment, or otherwise creating heat that could ignite vapors near any Class B combustibles.

Electrical Fires

There are many combustible materials, including electrical equipment, oxidizing chemicals, fast-reacting or explosive compounds, and flammable metals, which present specialized fire safety and extinguishing problems.

Refer to other appropriate chapters of this manual for safe handling advice. If in doubt, request advice from the Responsible Safety Officer.

Portable Heaters

The use of these devices, whether privately or Providus owned, is allowed only where there is no chance of causing injury to personnel or of creating a fire hazard. This provision obviously requires common sense in safely locating such devices and ensuring that they do not operate when they are unattended. These devices may not be used in locations where:

Flammable or explosive vapors or dusts may be present.

Smoking, eating, or drinking is prohibited because toxic or radioactive materials may be present.

The area has been designated as unsafe for such devices.

The following practices should be carried out when operating portable heating appliances:

Do not place the appliance on unstable or readily combustible materials.

Maintain a clearance of at least 12 inches between the appliance and combustible materials.

Ensure that the appliance is approved by either Underwriters Laboratories, Inc., or Factory Mutual Research Corporation.

Connect the appliance directly to a proper electrical outlet using only the cord with which it was originally equipped. Do not use extension cords in lieu of permanent wiring.

Do not operate appliances during off hours if they are unattended unless they are controlled by a timer installed by a licensed electrician. The timer will automatically de-energize the appliance during off hours and energize it not more than 30 minutes before the arrival of personnel. If 24-hour operation is desirable, the proposed operation and arrangement must be reviewed by the local Fire Department and a permit obtained. This permit must be posted near the operating appliance for the information of off-shift personnel who may be checking the area.

Fire Fighting Equipment

This section describes the fixed and portable equipment that is provided in working areas for fire protection. The fixed equipment includes automatic sprinklers, detectors and alarms, fire doors, etc. The portable equipment consists of fire extinguishers and hoses to be operated by employees before the arrival of the local Fire Department.

Fire Detectors

Several types of automatic fire detectors are used throughout Providus, according to particular needs and purposes. All of them will detect fire (by one of several means) and transmit an alarm to the fire station. In the many buildings equipped with evacuation alarm bells, the automatic detectors activate those alarms, as do the manual pull boxes. In some cases, automatic extinguishing systems are activated by automatic detectors. The Fire Department always dispatches firefighters and apparatus to the scene of any automatically actuated alarm.

Fire Doors

Automatic fire doors and dampers are provided at strategic points to close and block the spread of smoke and fire when these are sensed by automatic detectors. Automatic fire doors must never be blocked or left in disrepair so that they cannot close and latch automatically as intended in the event of a fire.

Self-closing fire doors are those doors designed and installed to close each time after being opened. They too must never be blocked, wedged, or tied open. If such doors must be kept open, the self-closers must be replaced with approved automatic smoke-activated release hold-open devices.

Fire Exits

Exit corridors must not be used for storage. The Life Safety Code, NFPA 101, requires that buildings designed for human occupancy must have continuous and unobstructed exits to permit prompt evacuation of the occupants and allow necessary access for responding emergency personnel. The intent of the Code is to keep exits free from obstructions and clear of combustible materials. Attention to housekeeping, therefore, is very important. "Temporary" storage of furniture, equipment, supplies, or anything else is not permitted in exit ways. Combustibles, including recyclable waste paper, are not permitted in exit ways.

Metal lockers with ends and tops ferried to the walls and that do not interfere with minimum exit width requirements may be installed in exit corridors when approved by the Fire Department and the Responsible Safety Officer.

The following requirements must be met for storage locker/cabinets:

Lockers will be permitted on one side of the corridor only.

Lockers must end at least 6 ft from the corridor exit door.

Locker ends must be at least 12 in. from the edge of the doorway on the latch side and from the edge of the door leaf when fully opened into the corridor.

The lockers must not be more than 20 in. deep by 37 in. wide by 72-3/4 in. high.

The lockers must be all metal construction with positive latches to prevent spillage of contents in the event of an earthquake.

All doors must return automatically to the closed position when not held open manually.

A 45 degree-angle fairing must be provided from the wall to the corridor corner of the cabinet. Fairing must be provided at both ends of locker or bank of lockers.

A 45 degree-angle fairing must be provided at the top of the lockers from the outside corridor edge of locker to the wall.

All lockers must be anchored to the wall firmly enough to withstand 0.5g of lateral acceleration (or a lateral load equal to ½ the total dead weight of the locker and its contents) in the event of an earthquake.

Liquids and chemicals are not to be stored in corridor lockers.

All lockers must be kept locked, with one key being retained by the Building Manager.

All lockers must be labeled with the contents and the name, address, and telephone number of the assigned user.

Any deviation from the above requirements must be approved by Responsible Safety Officer.

Mechanical Equipment Rooms

Mechanical equipment rooms contain boilers, blowers, compressors, filters, electrical equipment, etc. Such rooms must be separated from other areas of a building by fire-resistant walls and doors. To maintain the integrity of these separations, the fire doors must never be left open.

Fan rooms house ventilation equipment which often includes automatic shut down and dampers activated by interlocking with the building smoke and fire detectors. Fire dampers and other automatic shut-down provisions must not be disabled without Fire Department approval (as for temporary maintenance procedures).

Mechanical equipment rooms and fan rooms must not be used for storage of any kind.

Life Safety Code

The Life Safety Code of the National Fire Protection Association, NFPA 101, requires that emergency lighting be provided for means of egress in certain areas.

The Code states emergency lighting is required in exit corridors in any office-type building where the building is two or more stories in height above the level of exit discharge.

In industrial occupancies such as laboratories and shops, the Code requires emergency lighting in all exit aisles, corridors, and passageways. Emergency lighting may be installed in areas where not required by the Code when such areas present an egress hazard during a power failure.

Although elevators are not considered a means of egress within the jurisdiction of the Life Safety Code, they do require emergency lighting. (Titles 8 and 24 require that emergency lighting be maintained in an elevator for a period of at least four hours.)

Several types of emergency lights that satisfy the specifications of the Life Safety Code are:

Battery Type - Only rechargeable batteries may be used. The rating of the battery must be such that it provides power for illumination for one and one-half hours in the event of a failure of normal lighting.

Generator Type - When emergency lighting is provided by an electric generator, a delay of not more than 10 seconds is permitted.

Exit sign lights, when burned out, should be reported to Maintenance for service.

Exit Corridors

Exit corridors must not be used for storage. The Life Safety Code, NFPA 101, requires that buildings designed for human occupancy must have continuous and unobstructed exits to permit prompt evacuation of the occupants and allow necessary access for responding emergency personnel. The intent of the Code is to keep exits free from obstructions and clear of combustible materials. Attention to housekeeping, therefore, is very important. "Temporary" storage of furniture, equipment, supplies, or anything else is not permitted in exit ways. Combustibles, including recyclable waste paper, are not permitted in exit ways.

Metal lockers with ends and tops ferried to the walls and that do not interfere with minimum exit width requirements may be installed in exit corridors when approved by the Fire Department and the Responsible Safety Officer.

The following requirements must be met for storage locker/cabinets:

Lockers will be permitted on one side of the corridor only.

Lockers must end at least 6 ft from the corridor exit door.

Cabinet ends must be at least 12 in. from the edge of the doorway on the latch side and from the edge of the door leaf when fully opened into the corridor.

The lockers must not be more than 20 in. deep by 37 in. wide by 72-3/4 in. high.

The lockers must be all metal construction with positive latches to prevent spillage of contents in the event of an earthquake.

All doors must return automatically to the closed position when not held open manually.

A 45 degree-angle fairing must be provided from the wall to the corridor corner of the cabinet. Fairing must be provided at both ends of cabinet or bank of lockers.

A 45 degree-angle fairing must be provided at the top of the lockers from the outside corridor edge of cabinet to the wall.

All lockers must be anchored to the wall firmly enough to withstand 0.5g of lateral acceleration (or a lateral load equal to ½ the total dead weight of the cabinet and its contents) in the event of an earthquake.

Liquids and chemicals are not to be stored in corridor lockers.

All lockers must be kept locked, with one key being retained by the Building Manager.

All lockers must be labeled with the contents and the name, address, and telephone number of the assigned user.

Any deviation from the above requirements must be approved by Responsible Safety Officer.

No Smoking

Smoking is forbidden in certain areas for fire safety reasons. Such areas include the following:

Where flammable gases or liquids are stored, handled, or used.

Where significant quantities of combustible materials, such as paper, wood, cardboard, or plastics are stored, handled, or used.

Where liquid- or gaseous-oxygen is stored, handled, or used.

Within 20 ft of a smoke detector.

In tape and record storage vaults and computer equipment areas.

Areas that are designated “No Smoking” areas for fire safety reasons are indicated by large rectangular signs consisting of white backgrounds with red letters stating “NO SMOKING.”

Chapter 6

Materials Handling

Introduction

Providus requires that safety planning and practices for commonplace tasks be as thorough as for operations with unusual hazards. Commonplace tasks make up the greater part of the daily activities of most employees and, not unexpectedly, offer more potential sources of accidents with injuries and property damage. Every operation or work assignment begins and ends with handling of materials. Whether the material is a sheet of paper (paper cuts are painful) or a cylinder of toxic gas, accident risks can be reduced with thorough planning. Identifying obvious and hidden hazards should be the first step in planning work methods and job practices. Thorough planning should include all the steps associated with good management from job conception through crew and equipment decommissioning.

Most of the material presented in this chapter is related to the commonplace and obvious. Nevertheless, a majority of the incidents leading to injury, occupational illness, and property damage stem from failure to observe the principles associated with safe materials handling and storage.

A less obvious hazard is potential failure of used or excessive motorized handling or lifting equipment. The Responsible Safety Officer must be notified whenever it is desired to acquire a crane, forklift truck, or other motorized handling or lifting equipment from excessed sources.

Lifting and Moving

Lifting and moving of objects must be done by mechanical devices rather than by manual effort whenever this is practical. The equipment used must be appropriate for the lifting or moving task. Lifting and moving devices must be operated only by personnel trained and authorized to operate them. Employees must not be required to lift heavy or bulky objects that overtax their physical condition or capability.

The supervisor must make certain that personnel know how to move objects safely by hand or with mechanical devices in the operations normal to the area and must permit only those employees who are formally qualified by training and certification to operate a fork truck, crane, or hoist. The supervisor must enforce the use of safe lifting techniques and maintain lifting equipment in good mechanical condition.

Employees are required to observe all established safety regulations relating to safe lifting techniques.

Manual Lifting Rules

Manual lifting and handling of material must be done by methods that ensure the safety of both the employee and the material. It is Providus' policy that employees whose work assignments require heavy lifting be properly trained and physically qualified, by medical examination if deemed necessary.

The following are rules for manual lifting:

Inspect the load to be lifted for sharp edges, splinters, and wet or greasy spots.

Wear gloves when lifting or handling objects with sharp or splintered edges. These gloves must be free of oil, grease, or other agents that may cause a poor grip.

Inspect the route over which the load is to be carried. It should be in plain view and free of obstructions or spillage that could cause tripping or slipping.

Consider the distance the load is to be carried. Recognize the fact your gripping power may weaken over long distances.

Size up the load and make a preliminary "heft" to be sure the load is easily within your lifting capacity. If it is not, get help.

If team lifting is required, personnel should be similar in size and physique.

One person should act as leader and give the commands to lift, lower, etc.

Two persons carrying a long piece of pipe or lumber should carry it on the same shoulder and walk in step. Shoulder pads should be used to prevent cutting shoulders and help reduce fatigue.

To lift an object off the ground, the following are manual lifting steps:

Make sure of good footing and set your feet about 10 to 15 inches apart. It may help to set one foot forward of the other.

Assume a knee-bend or squatting position, keeping your back straight and upright. Get a firm grip and lift the object by straightening your knees - not your back.

Carry the load close to your body (not on extended arms). To turn or change your position, shift your feet - don't twist your back.

The steps for setting an object on the ground are the same as above, but in reverse.

Load Path Safety

Loads moved with any material handling equipment must not pass over any personnel. The load path must be selected and controlled to eliminate the possibility of injury to employees should the material handling equipment fail. Equipment worked on while supported by material handling equipment must have a redundant supporting system capable of supporting all loads that could be imposed by failure of the mechanical handling equipment. A suspended load must never be left unattended but must be lowered to the working surface and the material handling equipment secured before leaving the load unattended.

Off Site Shipping

Material being shipped off site must be packed or crated by competent shipping personnel. Boxes, wooden crates, and other packing materials must be safely consigned to waste or salvage as soon as practicable following unpacking.

Clean Work Areas

All areas controlled by Providus must be kept in orderly and clean condition and used only for activities or operations for which they have been approved.

The following specific rules must also be followed:

Keep stairs, corridors, and aisles clear. Traffic lanes and loading areas must be kept clear and marked appropriately.

Store materials in work rooms or designated storage areas only. Do not use hallways, fan lofts, or boiler and equipment rooms as storage areas.

Do not allow exits, passageways, or access to equipment to become obstructed by either stored materials or materials and equipment that is being used.

Arrange stored materials safely to prevent tipping, falling, collapsing, rolling, or spreading - that is, any undesired and unsafe motion.

Do not exceed the rated floor capacity of stored material for the area. The load limit and the maximum height to which material may be stacked must be posted.

Place materials such as cartons, boxes, drums, lumber, pipe, and bar stock in racks or in stable piles as appropriate for the type of material.

Store materials that are radioactive, fissile, flammable, explosive, oxidizing, corrosive, or pyrophoric only under conditions approved for the specific use by the Responsible Safety Officer.

Segregate and store incompatible materials in separate locations.

Remove items that will not be required for extended periods from work areas and put them in warehouse storage. Call for assistance.

Temporary equipment required for special projects or support activities must be installed so that it will not constitute a hazard. A minimum clearance of 36 inches must be maintained around electrical power panels. Wiring and cables must be installed in a safe and orderly manner, preferably in cable trays. Machinery and possible contact points with electrical power must have appropriate guarding. The controls for temporary equipment must be located to prevent inadvertent actuation or awkward manipulation. When heat-producing equipment must be installed, avoid accidental ignition of combustible materials or touching of surfaces above 60 degrees C (140 F). Every work location must be provided with illumination that meets OSHA requirements. Evaluation of illumination quality and requirements is made by the Responsible Safety Officer, but the supervisor of an area is responsible for obtaining and maintaining suitable illumination.

Areas without natural lighting and areas where hazardous operations are conducted must be provided with enough automatically activated emergency lighting to permit exit or entry of personnel if the primary lighting fails.

Chapter 7

Traffic and Transportation

Safety Belts

Employees operating or riding in Providus-furnished vehicles, or personal vehicles on official Providus business, are required to wear safety belts at all times. The driver should instruct the passengers to fasten their safety belts before operating the vehicle.

Accidents

Any accident involving Providus vehicles (included private, rented, or leased vehicles used on official Providus business) must be reported to the driver's supervisor. If the driver is unable to make a report, another employee who knows the details of the accident must make the report.

It is Providus' policy that employees should not admit to responsibility for vehicle accidents occurring while on official business. It is important that such admissions, when appropriate, be reserved for Providus and its insurance carrier. The law requires that each driver involved in a vehicle accident must show his/her license on request by the other party. Be sure to obtain adequate information on the drivers involved as well as on the owner of the vehicles. Names, addresses, driver's license numbers, vehicle descriptions, and registration information are essential. In addition, a description of damages is needed for completion of accident reports. If the accident is investigated by off-site police agencies, request that a copy of the police report be sent to

Providus, or obtain the name and department of the investigating officer. A printed card titled “In Case of Accident” is kept in each official vehicle to assist in collecting required information.

In case of collision with an unattended vehicle (or other property), the driver of the moving vehicle is required by law to notify the other party and to exchange information pertaining to the collision. If unable to locate the other party, leave a note in, or attached to, the vehicle (or other property) giving the driver’s name, address, and vehicle license number.

The driver of any Providus vehicle involved in an accident must also complete a Providus Motor Vehicle Accident Report and submit it to his/her supervisor within one work day of the accident.

The supervisor should interview the driver and complete the supervisor’s portion of the report. Within two work days of the accident, the completed form and vehicle must be taken to the Administration Office so that damages may be estimated and repairs scheduled.

Forms for obtaining appropriate information about an accident are carried in the vehicle or may be obtained from Administration. The Responsible Safety Officer will receive copies of all accident reports and will prepare any required OSHA reports.

Chapter 8

Hazard Warnings

Introduction

Every reasonable method to warn employees of hazards and dangers and to inform them of the actions required must be utilized. Signs, characteristic lights, and audible alarms as additional safeguards for built-in mechanical and physical protection must be used. To ensure uniform response by personnel, the warning signs and devices must be of the same type for similar hazards. Obtaining and installing the warning systems is the responsibility of the group needing them.

Contents and Configuration

Signs must conform to the colors, symbols, lettering size, and proportions as specified by Providus, except that radiation signs must conform to the requirements stated in 10 CFR 20. Every warning sign must include the following components:

An approved heading that indicates the relative hazard.

A statement of the type of hazard.

A statement of what to do or not to do in the area.