



Corporate Health & Safety Policy and Accident Prevention Program

Prepared on January 1, 2023 by:
Embassy Corporation

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THE PRESIDENT'S MESSAGE

TO: All employees

SAFETY TAKES PRIORITY

It is the purpose of Embassy Corp. to have the commitment to prevent occupational illness and injury in the workplace, comply with all Occupational Health and Safety Acts & Regulations, and maintain our equipment and premises in a safe condition.

In fulfilling our objectives, Embassy Corp. will comply above and beyond the Occupational Health & Safety Act & Regulations with acceptable diligence practices. In addition, we will strive to eliminate any foreseeable hazards, which may potentially cause injury or harm to our workers.

Embassy Corp. management, in co-operation with workers, is responsible to implement and maintain a safe and healthy work environment. All supervisors and workers will receive training about their respective health and safety responsibilities, and will be individually accountable for fulfilling those responsibilities. Supervisors will ensure that safe and healthy work conditions are maintained in his/her assigned work area.

To be effective, safety must be a shared responsibility among all levels in the company, management and employees working on our job sites proactively. Accordingly, Embassy Corp. employees all shall work in compliance with the Occupational Health & Safety Act and Regulations and with safe working practices and procedures as established by the company and as is customary in the construction industry. To achieve this objective, Embassy Corp. its supervisors and all workers have the obligation and responsibility to work in compliance with our safety policy.

Embassy Corp. is committed to maintaining open lines of communication between management and its supervisors and/or workers. All workers must report all unsafe or unhealthy conditions to their supervisors or management as soon as they are observed.

All contractors, subcontractors and their workers will be made aware of Embassy Corp. health and safety rules and shall work in compliance with these requirements as well as the Occupational Health and Safety Act.

Embassy Corp. wishes to stress that all individuals on the company's job sites, at all levels and functions, must accept their specific responsibilities in achieving the objectives of this Health & Safety Policy.

Yours truly, *Peter Leone*

Peter Leone
President

Date: Jan.01/2023

COMPANY POLICY ON HARASSMENT AND DISCRIMINATION IN THE WORKPLACE

The Embassy Corporation is committed to providing its employees with a workplace that is free of harassment and discrimination. Relationships between Embassy Corporation employees will be non-discriminatory with respect to race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offences, marital status, same-sex partnership status, family status, or handicap status. Harassment or discrimination, whether verbal, physical or environmental is unacceptable.

Contractors hired by the Embassy Corporation are also required to abide by our Harassment and Discrimination Policies. Failure on the part of any contractor, its sub-contractors or their employees, including our own employees, to comply with these requirements will not be tolerated and may result in termination of the contract and/or immediate removal of the offending contractor employee, subcontractor or its employee, either temporarily or permanently.

WORKPLACE VIOLENCE, HARASSMENT AND DISCRIMINATION PREVENTION AND RESPONSE PROGRAM

PURPOSE:

To proactively assess the risks of workplace violence and harassment that may arise in the course of our work and to support our direct hired workers, supplied labour and subcontracted employees who raise issues of workplace harassment and /or violence at our workplaces.

DEFINITIONS:

Workplace Violence:

- “exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker,
- An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker,
- A statement or behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker”

Workplace Harassment:

“Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome” Workplace harassment may include bullying, intimidating or offensive jokes or innuendos, displaying or circulating offensive pictures or materials, or offensive or intimidating phone calls.

SCOPE:

This policy applies to all employees, subcontractors and persons hired on a temporary basis or hired through a temporary help service. It applies not only to incidents which occur at work but may also apply to incidents of violence in the course of an employment relationship involving individuals away from the workplace or outside working hours or in any situation where this protocol can help an employee with a response or solution.

STANDARDS AND PROCEDURES:

Our policy statement on workplace violence and harassment:

Embassy Corporation is committed to providing a workplace that does not tolerate threats, or acts of violence of any sort, or harassment by or against its employees. The management team of Embassy Corporation will respond to every incident of actual or potential violence or harassment immediately, in a manner that is proportionate to the seriousness of the situation. Any violent behavior or actions as well as any verbal threat of violence or harassment, will be taken with the utmost seriousness and can be considered as grounds for dismissal.

CONFIDENTIALITY

Embassy Corporation management will ensure the confidentiality of the information collected and used in this Policy in accordance with the privacy principles (*Freedom of Information and Protection of Privacy Act*).

Employee Reporting Procedures:

In the case of a violent act resulting in serious injury - CALL 911 IMMEDIATELY, then contact your crew foreman. The crew foreman of the work area shall immediately call our company health and safety coordinator and the project manager to notify them of the event.

Behavior You Should Report:

- A. A threat or threatening behavior may consist of word or actions that create a perception that there may be an intent to harm persons or property, or actions or words that actually bring about harm, such as:

- ✓ A threat can be explicit or implied.
- ✓ A threat can be the result of verbal, written or non-verbal actions.
- ✓ Statements made in the guise of a joke may be considered threatening in the circumstances.

Examples of threats include but are not limited to:

- ✓ physical contact or force by a person against a worker that causes or could cause physical injury
- ✓ Verbal / written statements or behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury.
- ✓ Gestures or comments implying that physical contact will be used, such as gestures of punching, choking, or stabbing.
- ✓ Stalking behavior.
- ✓ Possessing a weapon in the workplace or on company property.

B. Actual physical violence is the unwanted touching of a person or his/her possession with an intent to create fear or cause harm, or which does create fear or harm.

- ✓ An act may constitute physical violence even if no injury or harm occurs.
- ✓ The used of an object to cause unwanted touching may also constitute physical violence.

Note: These examples are not all-inclusive; they are merely to assist the reader in understanding what behavior is prohibited and what may be construed to be threatening.

PROCEDURE

Protocol for a Response to an Incident of Violence, Harassment or Discrimination

Step 1 – Call the local emergency number (911) or the police if a situation is deemed life threatening or a threat to individual safety.

Step 2 – Speak with your manager, foreman, or another member of the company management team immediately.

Step 3 – Manager, foreman, or management team representative gathers the facts of the incident.

Step 4 – The General Manager is contacted and the facts of the incident are reviewed.

Step 5 – General Manager identifies lead role, determines action plan, assigns responsibilities and follows up. A file is created containing all of the information gathered regarding the incident.

RESTRAINING ORDER

All employees of Embassy Corporation who apply for or obtain a protective or restraining order which lists company locations as being protected areas, must provide management a copy of the petition and declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and a copy of any protective or restraining order which is made permanent.

RESPONSIBILITIES ROLES:

Employer Responsibility:

- Post a policy statement on our central communicate board regarding workplace violence.
- Ensure workers are made aware of our workplace violence program and trained on how to recognize workplace violence through New Hire orientation and our workforce safety meetings.

- Ensure that appropriate procedures are in place to minimize the risk to our employees from violence.
- Inform employees if they are working in an area where there is a potential for violence and identify any risks that are specific to that area.
- Ensure that every reported incident of workplace violence is investigated, and potential areas for improvement are identified.

Project Manager Responsibility:

- During PJO (planned job observation) routines or through employee conversations, establish whether workers have any issues regarding workplace violence.
- Investigate any report forwarded to you regarding any complaint /event of workplace violence and forward investigation results to the company health and safety coordinator.

Supervisor Responsibility: Defined as:

"Supervisor" means a person who has charge of a workplace or authority over a worker;

*A Supervisor must also be a **competent person**.*

"Competent person" means a person who,

- i. Is qualified because of his knowledge, training and experience to organize the work and its performance,*
- ii. Is familiar with the provisions of the Act and the Regulations that apply to the work, and*
- iii. Has knowledge of any potential or actual danger to health or safety in the work place;*

- a) Ensure that the Company's Safety System is followed at the work level, and maintain responsibility for on-site accident prevention.
- b) Ensure applicable washroom/clean-up facilities are on the project, as well as potable drinking water
- c) Ensure all workers are informed of hazards, and have been provided with training on how to work with the identified hazards.
- d) Report accidents and injuries to management as required by the program and regulations.
- e) Obtain and submit all training and safety documentation to the Safety Consultant promptly, and maintain on-site documents and materials as required.
- f) Provide and enforce corrective actions for violations of the Company's Safety System.
- g) Consult and co-operate with the Health and Safety Representative/Committee where appropriate.
- h) Discuss hazards and controls with workers and complete the Hazard Identification form, respond to workers concerns by the next shift, ensure that the form details the action or non - action which will be taken, and provide a copy of the completed Hazard Identification form to middle management.

Employee Responsibility:

- Workers are expected to notify their foreman or a member of our management of any threats, which you have witnessed, received, or have been told that another person has witnessed or received. All investigations will be handled in as discreet and confidential a fashion as possible. No person will be adversely affected in employment as a result of bringing complaints or participating in an investigation under this policy.
- Employees are not to bring or be in possession of any types of weapons whatsoever while at work, or use (or threaten to use) any object as a weapon. Such behavior is subject to disciplinary action including termination.
- Employees are required to be familiar with and follow the procedures that are in place to protect them from workplace violence.

COMMUNICATION:

Our workplace violence program will be communicated through the following methods:

- Workplace Violence Policy shall be posted on our central communicate board at headquarter facility.
- New Hire worker safety program orientation session will give mention of our program.
- Also to be communicated during our workforce safety meetings.
- Our Joint Health and Safety Committee will be kept informed of any workplace violence event.

The Policy will be reviewed each year and any changes will be communicated by the supervisor to workers immediately, or as soon as possible, after the changes are made.

TRAINING:

The Embassy Corporation will ensure that the individual(s) responsible for this Policy has (have) training and understanding of the confidentiality and security of employee information as well as privacy principles. Training in workplace violence identification and reporting procedures will be through our safety meetings and crew safety talks.

EVALUATION:

This program will be evaluated on an annual basis by our company management, with collaboration by the Joint Health and Safety Committee. The purpose of the evaluation is to determine if we are meeting the objectives of zero incidents. The program standards and its effectiveness shall be assessed and revisions made as required to address areas of deficiencies noted. We are committed to using the results of our evaluation to improve this program.

REFERENCE: LEGISLATED AUTHORITY

- *Health & Safety Act (OHSA), SECTION 25 as amended by Bill 168*
- *Freedom of Information and Protection of Privacy Act (FIPPA)*

FORMS:

- *Harassment / Violence Incident Form*
- *Workplace Violence Assessment Form*

REPORTING FORM

HARRASSMENT IN THE WORKPLACE ☐

VIOLENCE IN THE WORKPLACE ☐

Incident Report Form

Complainant Information

Last Name

First Name

Phone Number

Date/Month/Year of Incident _____

Time of Day: _____

Respondent Information

Name, if known: _____

Relationship: ____ Co-worker ____ Client ____ Supervisor ____ Member of the Public

____ Other (please specify)

Name of Witnesses and/or those providing assistance

____ Co-worker ____ Client ____ Supervisor ____ Member of the Public

____ Other (please specify)

Description

Give a thorough description of the incident (what happened, where it occurred, what led up to the incident, who else was present, what action was taken at the time, what impact the incident had on you).

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Medical Attention Required

_____ Yes _____ No

The purpose of this form is to document your claim to assist in a thorough investigation of the complaint.

Signature of person reporting incident

Today's Date _____

Upon completion, please forward to: _____

2.0 THE INTERNAL RESPONSIBILITY SYSTEM:

2.1 PRESIDENT:

The President has issued a corporate health and safety message related to the Embassy Corporation Health and Safety Program. The President's statement provides a commitment that the health and safety of our workers and our working environment is of the highest priority. The President may instruct periodically, that changes be made in the overall program design, objectives, implementation methods, planning and control of operations and expected levels of performance. The President maintains overall control of budgets and funding for sponsored safety training and awareness programs.

Our Safety Program Review Process – Annual Workforce Safety Meeting

The President shall on a annual basis, arrange to hold a general workforce level safety meeting to receive performance and statistical feedback on the status of our safety program. The President will order changes to the safety program as required to create improvements.

Open Door Policy:

The President extends an open door policy where any worker can directly arrange to meet with him to discuss any safety concern that is not being addressed by management.

2.2 MANAGER OF CONSTRUCTION OPERATIONS:

The Manager of Construction Operations will ensure that all aspects of our Health and Safety Program are being applied and that all established safety policies and procedures are administered and enforced at the administration level. The Manager of Construction Operations shall assist the President in the implementation and planning of our safety program such as in the establishment of guidelines and safety training pertaining to healthy work conditions and worker practices, with professional institutions, associations and professional safety consultants. The Manager of Construction Operations is also responsible for ensuring that hired management and field personnel are given a safety orientation to the Embassy Corporation Health and Safety Program within 48 hours of assuming their position.

Our Safety Program Review Process – Bi-Annual Supervisor Safety Reviews

The President shall arrange to hold bi-annual safety reviews (every six months) with the Manager of Construction Operations, Project Managers and Supervisors to review safety performances based on internal observations and external (professional safety auditing reports). Constructive dialogue in accurately assessing our safety performances and how enhance and improve our safety program is the key focus of these meetings. This meeting shall be minuted and improvements targeted based on discussions.

2.3 CORPORATE SAFETY OFFICER:

The corporate safety officer is accountable to the President for ensuring that all aspects of the Embassy Corporation health and safety program is being administered and enforced at all levels of our organization. The corporate safety officer (consultant) shall ensure that Job Task Safety Analysis studies are done by our trade contractors for critical tasks performed on our projects. The JSA study must include the appropriate methods of controls, to eliminate or reduce hazards on our projects.

2.4 PROJECT MANAGER:

The Project Manager will assist the Manager of Construction Operations by ensuring that all field operations personnel are aware of, understand and effectively practice the safety policies and procedures as set out in our safety program. Together with the crew foremen, the Project Manager shall insist on compliance with the Ontario Occupational Health and Safety Act and its Regulations for Construction Projects, from both our own staff and that of our subcontractor companies. The Project Manager shall ensure that our safety program is being routinely assessed for its degree of effectiveness, on all our projects, by a competent person such as our professional Health and Safety Consultant. Our professional safety consultant will routinely assess our projects for hazards and poor work practices and make recommendations for improvement. The professional consultant will review these safety inspection report findings and recommendations with our project superintendent on site. The project superintendent is expected to forward his copy of the safety inspection report to the Project Manager within 24 hours, with explanations of the corrective action taken. The Project Manager shall in turn (after review) forward these reports to the Manager of Construction Operations for review.

2.5 PROJECT SUPERINTENDENTS:

The responsibility for safe work operations of a specific project is generally that of the project superintendent or his competent replacement who, as the on-site "COMPETENT PERSON" (as defined in Ontario's Occupational Health & Safety Act for Construction Projects), carries the legal responsibility for the work site conditions and work practices. The project superintendent or his competent replacement shall assist the Project Manager in carrying through with all the specified management responsibilities as outlined in our corporate health and safety policy.

The project superintendent together with the Project Manager has the responsibility to ensure the health and safety of his or her crew and that each worker under his supervision is fully aware of the company safety policy and rules of conduct. The project superintendent must ensure that each member of his or her crew, understand the safe procedures of the work, the actual and potential hazards of the work and the safety regulations that apply to the work.

Supervisor Work Area Safety Checks:

Safety checks for hazards should be done by the project superintendent or his designate who is competent to do so (safety consultant), before the commencement of work and as often as necessary to ensure the health and safety of workers on the project. In addition, the practice of routine hazard checks by trade supervisors demonstrates leadership and genuine concern for his/her workers and will set a good example to the crew. All safety checks shall be documented.

Injury reporting and investigations:

The trade supervisor must also insist his or her workers report all injuries and hazards of which they become aware to him/her directly. In the event of an accident or incident, the trade supervisor must immediately notify the project superintendent and protect the accident / incident scene for the purposes of the follow-up investigation. Upon completion of the investigation, the trade supervisor shall review the cause, contributing factors and measures to prevent a recurrence, with his or her crew. This is the time for the supervisor to conduct further coaching to the crew so they clearly understands these corrective measures and what is expected of them.

CREW SAFETY TALKS

It is expected that all trade contractor supervisor shall conduct weekly safety talks with their crews and address the safety concerns brought forward. These crew safety talks shall be rostered and minuted, and copies of these minutes shall be forwarded to the Manager of Construction Operations within 24 hours. The project superintendent is encouraged to use the assistance of our professional safety consultants for such meetings if deemed necessary, however the prime responsibility lies with the project supervisor to hold these meetings.

Supervisor Job Task Safety Analysis Reviews:

For operations involving critical tasks (high risk component), the trade supervisor should conduct a JSA (Job Safety Analysis) study. The JSA is a study of the sequential steps of the job task. The actual or potential hazards associated with each step of the task will be listed along with the necessary controls needed to eliminate or reduce the level of risk. The supervisor's workers should be included in this JSA process so their input can be considered and if warranted implemented into the JSA documents. The final JSA must be communicated to the workers involved in the job task. It is recommended that a daily review of the JSA be conducted by the trade supervisor and the crew involved to determine whether any changes to risk exists due to procedural changes, weather, collateral work by other trades, etc. All workers and the supervisor should sign in on the initial JSA and daily JSA review sheets. A sample JSA document is shown on the following page. Safe work procedures can be developed through the use of such Job Safety Analysis studies.

JOB SAFETY ANALYSIS (JSA) FORM

Pg 1 / 4

Site/Project:		
Name of Contractor/Subcontractor:	Date:	Weather:
Task/Activity:		
Check applicable anticipated or potential hazards:		
<input type="checkbox"/> Work Affecting Integrity of Critical Control Systems <input type="checkbox"/> Electrical (Live) <input type="checkbox"/> Electrical (Isolation) <input type="checkbox"/> Hot Work <input type="checkbox"/> Confined Space Entry <input type="checkbox"/> Equipment Handling & Dismantling <input type="checkbox"/> Excavation <input type="checkbox"/> Stored Pressure Systems (e.g. Propane, NH ₃) <input type="checkbox"/> Radiography/X-Ray Testing	<input type="checkbox"/> Heavy Equipment Lifting <input type="checkbox"/> Traffic Patterns (Mobile Equipment / Pedestrian) <input type="checkbox"/> Temporary Pumping & Transfer Facilities <input type="checkbox"/> Extreme Weather <input type="checkbox"/> Pile Driving / Drilling Equipment <input type="checkbox"/> Borehole drilling / Test pit excavation <input type="checkbox"/> Pressure Testing <input type="checkbox"/> Overhead Power Lines <input type="checkbox"/> Hydroblasting/Sandblasting	<input type="checkbox"/> Work at Height (scaffolds, ladders, roofs, canopies, etc.) <input type="checkbox"/> Underground Tank Removal/Disposal <input type="checkbox"/> Demolition <input type="checkbox"/> Exposed Handling of Petroleum Products <input type="checkbox"/> Mobile Equipment <input type="checkbox"/> Drilling, Grinding, and Cutting <input type="checkbox"/> Work in Hazardous Area (e.g. designated substances) <input type="checkbox"/> Other: <input type="checkbox"/> Other:
Ensure that all hazards identified are addressed in JSA below (refer to existing generic SMS/JSAs as required)		
Sequence of Basic Job Steps	Potential Hazards	Safety Controls to Reduce or Eliminate Hazard
1.		
2.		
3.		
4.		
5.		

Where necessary, insert additional pages to complete JSA

Sequence of Basic Job Steps	Potential Hazards	Safety Controls to Reduce or Eliminate Hazard
6.		
7.		
8.		
9.		
10.		
11.		
12.		

Where necessary, insert additional pages to complete JSA

<u>Tools / Equipment:</u> <i>(List of tools / equipment to be used and their storage on site including ladders, steps, mobile scaffold, harness etc., if relevant to safety at the site)</i>
<u>Personal Protective Equipment:</u> <i>(Minimum requirement: safety shoes / hard hat / visi-vest / gloves on person and used as required)</i> Additional PPE: <input type="checkbox"/> Eye Protection <i>(type required)</i> <input type="checkbox"/> Other <i>(e.g. fire retardant coveralls, breathing apparatus, etc.)</i> <input type="checkbox"/> Hearing Protection <input type="checkbox"/> Fall Protection <input type="checkbox"/> Rubber footwear and gloves if in damp area
<u>Outside Authorities:</u> <i>(Any authorities who need to be advised including site operator)</i>
<u>Disposal of surplus or contaminated materials:</u> <i>(Disposal details, e.g. when, where to, how, etc)</i>

PREPARED BY: _____	POSITION: _____	DATE: _____
PERSON(S) CARRYING OUT WORK: NAME(S):	SIGNED:	DATE:
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
JSA APPROVED BY (SUPERVISOR):	SIGNED:	DATE:
_____	_____	_____

Note: For tasks/activities that extend beyond a single day, use attached DAILY RENEWAL form for review of crew of JSA with current crew and weather.

JOB SAFETY ANALYSIS (JSA) - DAILY RENEWAL <small>(For JSA activities that extend beyond one day)</small>		
Date:	Weather:	
Changes noted:		
Supervisor (Print & Sign):		
Participant name(s):		
Date:	Weather:	
Changes noted:		
Supervisor (Print & Sign):		
Participant name(s):		
Date:	Weather:	
Changes noted:		
Supervisor (Print & Sign):		
Participant name(s):		
Date:	Weather:	
Changes noted:		
Supervisor (Print & Sign):		
Participant name(s):		

2.6 **WORKER:**

The worker has a personal responsibility to work safely and in accordance with our corporate health and safety policy and Ontario's Occupational Health and Safety Act and its Regulations for Construction Projects.

The worker is also obligated by law to report any unsafe condition, practices, or injuries of which he is aware, to his supervisor immediately so appropriate action may be taken. The worker also has the right to inform his safety representative of any safety issues. The Worker is expected to help new employees recognize job hazards and follow proper safe work procedures.

Work Refusal where worker is endangered

The worker has the right to refuse work, which he feels is unsafe to perform but may, by the same right, be refused permission to work by management if he or she fails to perform safely and in accordance to the Occupational Health and Safety Act and it's Regulations. All work refusals by a worker must be promptly investigated by the project superintendent and Project Manager and all measures must be taken to resolve the source of the work refusal.

Worker participation in Job Task Safety Analysis Reviews:

During JSA studies (Job Safety Analysis), workers are to be included in this process so their input can be considered and if warranted implemented into the JSA documents. The JSA is a study of the sequential steps of the job task. The actual or potential hazards associated with each step of the task will be listed along with the necessary controls needed to eliminate or reduce the level of risk. The final JSA must be communicated to the workers involved in the job task. It is recommended that a daily review of the JSA be conducted by the project superintendent and the workers involved. All should sign in on the initial and daily JSA review sheet.

2.7 SAFETY REPRESENTATIVE:

Where required under the Occupational Health and Safety Act, a Labour Safety Representative shall be appointed at the work site and he or she shall be responsible for identifying situations that may be a source of danger or hazard to workers. The Safety Representative also has the right to conduct a monthly inspection of the work areas and report his findings and recommendations to his or her supervisor or project manager and to the Joint Health and Safety Committee (if applicable) so corrective action may be taken. Crews of over five workers by law, is required to have a labour safety representative appointed by the workers or their respective union.

2.8 THE JOINT HEALTH AND SAFETY COMMITTEE REQUIREMENTS:

Under the Occupational Health and Safety Act, employers numbering over twenty employees must organize a Joint Health & Safety Committee for their headquarter operations. If Embassy Corporation takes on a constructor role, such a committee would have to be formulated for the project. Embassy Corporation management shall cause their employees or their unions to select at least one employee to act as the Labour Health & Safety Representative for this JH&S Committee, and this representative shall have the appropriate training for this function. In addition Embassy Corporation management shall also select a management member to act as the Management Health & Safety Representative for the J.H.&S. Committee. Both the Management and Labour Safety Representatives for the Joint Health and Safety Committee, shall, if the numbers require it, become "CERTIFIED MEMBERS" as defined under the Occupational Health and Safety Act.

POWERS OF THE JOINT HEALTH AND SAFETY COMMITTEE:

For the Committee to be effective, it should deal solely with safety issues and must not be allowed to become a general complaint session. Management response and involvement will determine the overall success of the Committee.

The primary function of the Joint Health and Safety Committee is to identify hazards at the workplace and to come up with solutions to safety concerns. Members of this committee should actively take part in the development, implementation and monitoring of all phases of the Embassy Corporation Health and Safety Program. *Copies of the meeting minutes* shall be distributed to J.H.&S. Committee members and shall post the meeting minutes for worker review. The Committee shall assist in resolving work refusals and promptly investigate reports of "dangerous circumstances" at the workplace.

2.8

PERIODIC WORK SITE INSPECTIONS BY SAFETY REPRESENTATIVES:

In accordance with the Occupational Health and Safety Act, the Joint Health and Safety Committee shall cause a labour safety representative to conduct a workplace safety inspection at least once a month and any circumstances that may be a source of danger to workers shall be reported to and considered by the Committee. Unsafe situations requiring prompt attention must be reported to the project superintendent or his competent replacement immediately. Recommendations for remedial action on safety issues will be listed on the Committee meeting minutes and assigned to the responsible party.

REQUIREMENTS FOR HEALTH AND SAFETY REPRESENTATIVES AND JOINT HEALTH AND SAFETY COMMITTEES FOR THE WORKPLACE

NUMBER OF WORKERS AT A PROJECT REGULARLY

GENERAL REQUIREMENTS

5 (five) or more

one health and safety representative [section 8(1)]

20 (twenty) or more

joint health and safety committee of two persons. One committee representative selected by management and one committee representative selected by the workers or if it is a unionized project, their unions. [see sections 9(2), 9(5)(a) & 9(5a)]

50 (fifty) or more

A joint health and safety committee of at least four persons. Two management committee representatives and two labour committee representatives. At least one labour and one management representative must be certified. [see sections 9(5f), 9(5g) and 9(8a)]

Trades Committee:

The joint health and safety committee shall cause a worker trades committee to be formed. All trade contractors having five or more workers should have a labour safety representative who shall participate in these worker trades committees. [see section 10]

THE DURATION OF A PROJECT MUST EXCEED 3 (three) MONTHS before the Joint Health and Safety Committee, Safety Representative Certification, and Worker Trades Committee requirements apply. [see sections 9(1); 9(5f) and 9(5g); and 10(1) respectively]

2.9

EMBASSY CORPORATION

SAFETY MEETING SCHEDULE

MEETING TYPE AND FREQUENCY

GENERAL PURPOSE

Annual Safety Forum
- all employees

Annual Seminar on safety performance of previous years, educational sessions, targeting goals for upcoming year.

Construction Manager's bi-annual meeting with project managers and supervisors

Review of safety performances in the field and improvement strategies to be implemented. Assessment of safety training needs.

Quarterly Joint Health and Safety Committee Meetings

Certified members of our corporate health and safety committee shall meet and discuss safety concerns raised by our field labour safety representatives or by management. This meeting frequency can be stepped up to monthly on our projects if deemed practical.

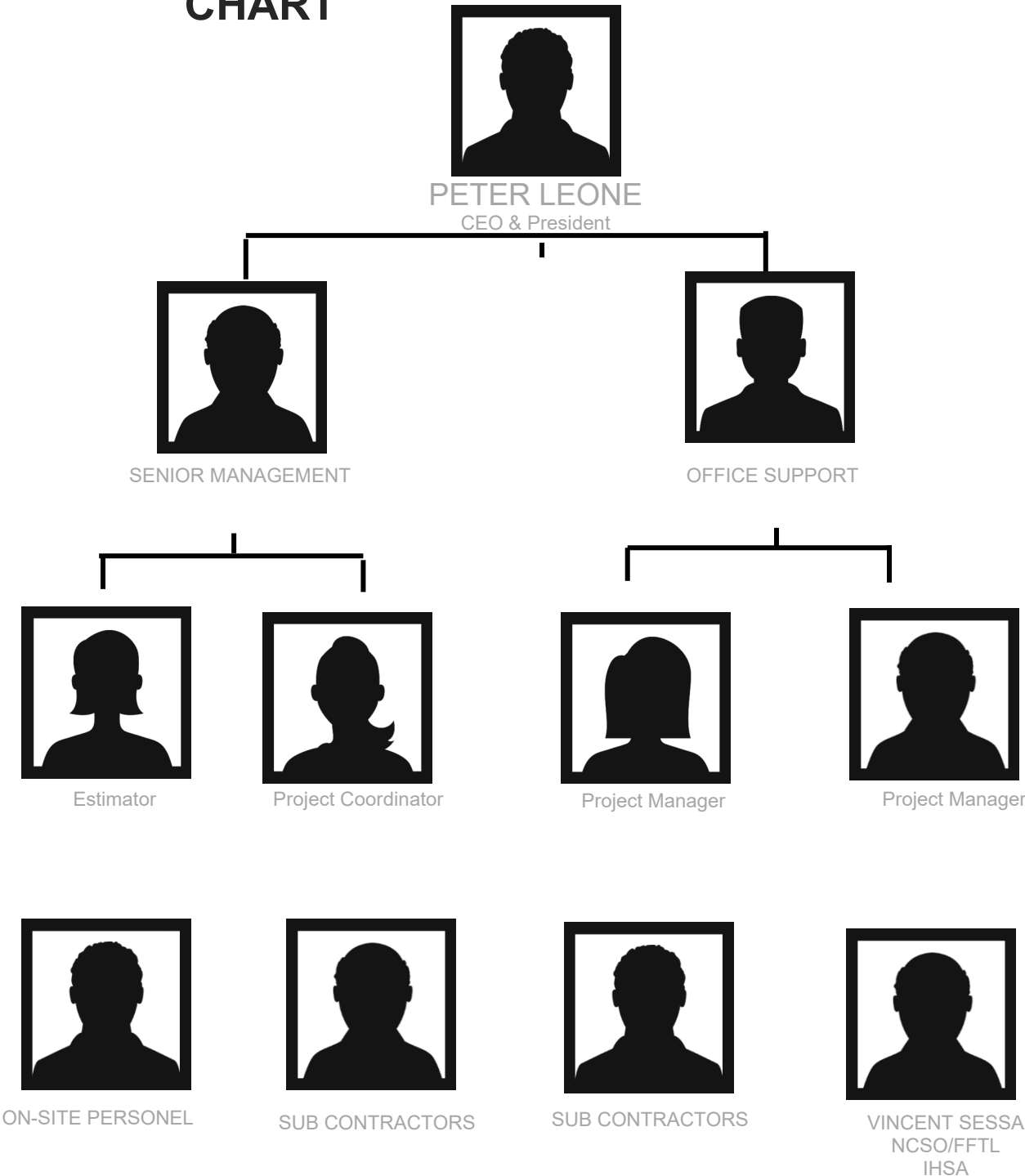
Contractor Weekly crew safety talks

Project superintendents are to hold weekly crew with their workers to ascertain employee safety concerns, and methods of controls to implement. These crew safety talk minutes should be forwarded to the Manager of Construction Operations for review.

3.0 COMMUNICATIONS AND SPECIFIED RESPONSIBILITIES:

The following pages outline the flow of communications within our organization and the specified responsibilities for management, supervisors and workers.

COMMUNICATION FLOW
CHART



3.1 SPECIFIED MANAGEMENT RESPONSIBILITIES

Management's primary responsibility is to provide a safe and healthy work environment and to ensure that the measures and procedures required by the Occupational Health and Safety Act and its regulations and our corporate safety policy are carried out on our projects.

The Embassy Corporation requires all management personnel, including trade contractors on our projects, to ensure that:

1. All employers and employees on our projects comply to the Ontario Health and Safety Act and its regulations.
2. Safe work procedures and practices are in place and adhered to.
3. The equipment and protective devices required by law are provided, maintained in good condition and used as prescribed.
4. Only competent persons, based on their knowledge, experience and training, are to be appointed as supervisors and that these supervisors are capable of safely organizing their work and its performance with an awareness of the hazards and safety laws applicable to their work.
5. Information, instruction and supervision is provided to workers for their health and safety.
6. Every precaution reasonable in the circumstances is taken to protect the health and safety of the workers.
7. Accidents and incidents are fully investigated and the findings forwarded to senior management for appropriate action.
8. All workers are aware of any actual or potential hazards that may be present in their jobs and at the workplace.
9. All employers and employees comply to the WHMIS (workplace hazardous materials information system) regulations and that all material safety data sheets and corresponding labeling are provided for all hazardous materials delivered, stored, handled or used in the workplace.
10. Safety violations are dealt with in accordance to the governing safety policy and result in warnings and disciplinary action.

3.2 **SPECIFIED SUPERVISOR RESPONSIBILITIES**

All supervisors, including TRADE CONTRACTOR SUPERVISORY PERSONNEL shall supervise the work of workers under their authority, either personally or by having an assistant who is a competent person, do so personally.

All supervisors must:

1. Ensure all workers including subcontractor employees are to be orientated to the Embassy Corporation corporate health & safety policy and program.
2. Ensure that all workers work in a manner that will not endanger themselves or other workers.
3. Ensure that workers wear and use the proper personal protective equipment, devices or clothing that is required by the employer to prevent injury.
4. Advise worker and management of any potential or actual health and safety hazard of which he may be aware.
5. Provide the information, instruction, and supervision to protect the workers health and safety.
6. Take every precaution reasonable in the circumstance to protect the health and safety of workers.
7. Where prescribed by law, provide oral and/or written instruction to a worker (in a language he understands), as to the measures and procedures the worker is to follow for his/her protection.
8. Hold weekly safety meetings with the crew and provide minutes of these meetings to Embassy Corporation Manager of Construction Operations for review.
9. Investigate all accidents/incidents promptly and provide a written report of the findings, with corrective measures to prevent a recurrence, to the Embassy Corporation head office immediately.
10. Deal with worker safety violations in a responsible and disciplinary manner, and provide documentation of the circumstances and action taken to management

3.3

SPECIFIED WORKER RESPONSIBILITIES

ALL WORKERS SHALL:

1. Work in compliance to the occupational health and safety act and it's regulations.
2. Work in compliance to the governing corporate health and safety policy.
3. Wear and use any personal protective equipment/clothing that is required for his or her health and safety.
4. Report any hazardous conditions or unsafe practices immediately to their supervisor.
5. Work in a manner that will not endanger his/her self or other workers.
6. Report any accidents/incidents regardless of its severity, to his/her supervisor, without delay.
7. Not remove or make ineffective any protective device required by the regulations or by the employer without providing an adequate temporary protective device and when the need for removing or making ineffective the protective device has ceased, the protective device shall be replaced immediately.
8. Not engage in any prank, contest, feat of strength, unnecessary running or rough boisterous conduct.
9. Shall exercise his or her right to know and undertake the precautions to be taken when working with hazardous materials in the workplace, by reviewing the material safety data sheets for the particular material in question and follow the instructions outlined in addition to any further measures, for his/her protection.
10. Obtain first aid promptly and notify their supervisor of any first aid situation that becomes a medical aid condition so the proper authorities can be notified.
11. Designated Substance Notification:
Should a worker suspect or know he or she has disturbed or otherwise come into contact with a "designated substance" as prescribed under Ontario's Occupational Health and Safety Act and its regulations, the worker shall immediately report the finding or suspicious material to his or her supervisor for further investigation.

3.4

WORK REFUSAL PROCESS WHERE HEALTH & SAFETY IS IN DANGER

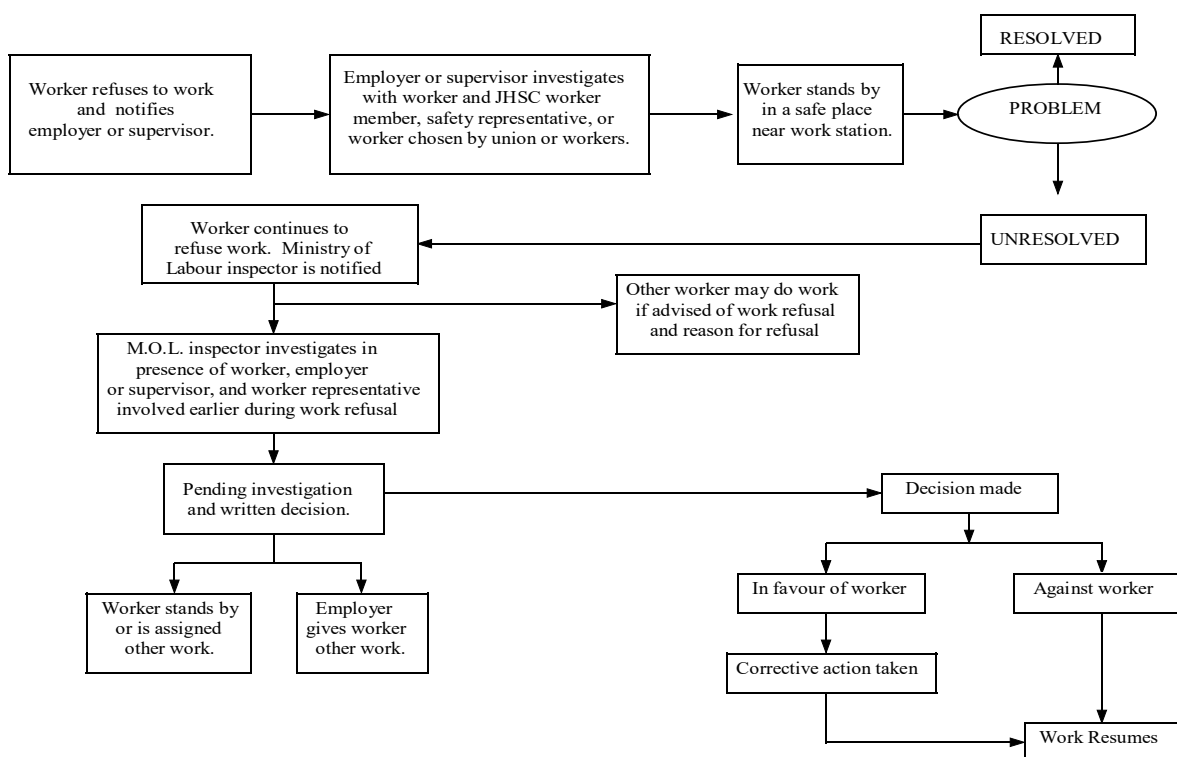
Should a worker feel that the assignment given to him may place his health or safety in danger, the worker has a right to refuse, what he perceives to be unsafe work. The worker will notify his immediate supervisor or employer of the work refusal and the supervisor and /or employer must immediately assess the situation in the presence of the a Joint Health & Safety Labour Committee member, his labour safety representative or a worker chosen by his union or fellow workers.

The employer and / or supervisor have a legal responsibility to investigate and make a determination whether the work refusal is substantiated and if so, make the necessary corrections. Another worker may perform the work being refused provided he is informed that a unsafe work refusal is in process and is explained the reasons for the work refusal.

If the employer and / or supervisor do not agree that a “dangerous circumstance” exists, the Ministry of Labour inspector for the area must be notified and this M.O.L. inspector will investigate the work refusal in the presence of the employer, supervisor, labour safety representative. Pending the results of the investigation, the worker refusing the work may be assigned other work during the investigation process or stands for further direction by the employer. The Ministry of Labour inspector’s decision is final.

RIGHT TO REFUSE WORK WHERE HEALTH AND SAFETY IS IN DANGER

(Occupational Health and Safety Act, - Part V)



4.0 ENFORCING H&S POLICY:

4.1 COMPANY CONDUCT RULES

Company conduct rules are established to ensure the protection of each employee and the company itself. These rules are designed to establish a safe and healthy work place that protects workers while minimizing the risks of hazards.

Additionally, these conduct rules will aid the company in maintaining its reputation as a leader in the construction industry. Failure to comply with these rules will result in corrective actions being administered to the employee(s) in breach of the rules and therefore may result in applicable corrections up to and including immediate dismissal if warranted.

Each employee is expected to act in a mature responsible and professional manner at all times. Each employee shall be knowledgeable of and follow all established safety rules.

Employees must maintain customer and supplier confidentiality. This includes all business transactions, pricing, material storage, construction techniques and all printed or electronic documentation.

Each employee shall meet the reasonable standards of efficiency and quality with a minimum of waste.

While in the employment of the Company, employees shall refrain from any employment with a competitive company.

Each employee will promptly report any sickness or injury to their Supervisor. All employees shall be fit and healthy to perform the work for which they are employed, or insure their physical capabilities will not pose a hazard to themselves or others.

As all situations cannot be accounted for, the following is a list of many **obvious unacceptable** activities for your guidance. If you have any questions concerning what may constitute an acceptable or unacceptable act, contact your supervisor for clarification prior to performing the act.

- Willful violation of any company, security or safety rule; or any deliberate action that is extreme in nature which is detrimental to the Company's efforts to operate profitably or which may damage the Company's reputation.
- Insubordination or failure to follow the instructions of the duly appointed and recognized supervisor, unless they are actively involved in exercising their right to refuse work under Section 43 of the OHSA.
- Negligence or any careless action which endangers the life or safety of yourself or any other person.
- Theft, dishonesty or unauthorized possession or removal from the premises of property belonging to the Company or another employee. This includes willful falsification or misrepresentation of work, employment or company records or documents.
- Engaging in criminal conduct, acts of violence by physical, threatening, or implying actions toward anyone on company premises or when representing the Company, or toward a fellow employee at any time.
- Being intoxicated or under the influence of any controlled substance while at work.
- Smoking in any enclosed space or vehicle which is contrary to the Provincial Jurisdictional Regulations
- Using or possessing any alcohol, controlled substance, weapon or firearm while on company premises.

- Failure to co-operate with other employees of the Company, and all those they come into contact with while working for the Company.
- Distracting or otherwise interfering with another employee's performance of duties.
- Using or failing to report defective or faulty work/equipment to the Supervisor upon discovery.
- Making or publishing any false or malicious statements concerning another employee, the Company or its products.
- Engaging in any immoral or indecent conduct on Company property, or workplace.
- Engaging in an act of harassment, sexual, racial or other; or creating an unwelcome atmosphere through jokes, slurs or innuendo.
- Fighting, horseplay and careless or disorderly conduct. Damaging the property of employees or of the Company.

4.2

SAFETY RULES

Safety rules are established to ensure the protection of each employee while in the employment of the Company. They are designed to establish safe and healthy work habits and minimize the risks of hazards that can result in work related illnesses or injuries. Failure to comply with these rules will result in corrective actions being administered to the employee(s) in breach of the rules and therefore may result in applicable corrections up to and including immediate dismissal if warranted.

All workers have the right to refuse to perform hazardous work, and shall request instruction on work procedures for work that is unfamiliar.

All managers, supervisors and workers shall be familiar with the current version of the Occupational Health and Safety Act and Regulations for Construction Projects as they apply to their particular work activities.

Hazardous conditions or practices must be reported to the Supervisor or lead hand immediately.

Any illness or injury (no matter how slight) must be reported to the Supervisor or lead hand immediately.

Procedures regarding the safe use of hazardous substances or agents shall be implemented immediately upon instruction and no hazardous substance or physical agent shall be used without having received information about safe usage.

All persons entering a work area must wear as a minimum:

- An approved hard hat
- CSA certified footwear
- An approved safety vest, or shirt
- Additional personal protective equipment must be worn according to the work performed.

Work areas and passageways must be kept clean. Debris, materials or any item that might cause a trip/fall hazard must be cleared or cleaned up immediately. Employees shall not create any unsafe or unsanitary conditions.

Workers who operate company vehicles must have a valid driver's license. Operate equipment and machinery only when trained and authorized to do so.

Use Lockout Procedures when adjusting or doing maintenance work or repairs on equipment.

Safety appliances and guards shall never be removed except when performing authorized maintenance procedures and the appliances and guards must be replaced before the equipment is put back into use.

Only trained, experienced and authorized personnel may operate material handling equipment. All lifting devices (chains, slings, and beams) must either be tagged or stamped with the safe working load, or have the safe working load known by the user.

A lifting device shall be operated in such a way that no part of the load passes over an employee. Repair work of any kind is not permitted under a suspended load unless the load is properly supported. Employees shall not walk under a suspended load.

When lifting, or pushing loads employees must not exceed their capacity. If an employee finds the load excessive or awkward, assistance must be asked for and provided. When manual lifting is required, the worker's back should be straight and the knees bent. The lift is made with the legs.

Rings, earrings or jewelry that is loose or dangling shall not be worn near any rotating shaft, spindle, gear, belt or other source of entanglement.

All fire extinguishers and firefighting equipment shall be kept clear for easy access at all times.

All portable ladders will be used with non-skid feet and placed on a firm level surface, tied or secured, with the safe angle of the distance from the base between 3:1 and 4:1 in terms of rise to run.

Horseplay, pranks, fighting, physical and verbal abuse, and harassment of any kind are all strictly prohibited.

4.3 **WARNING TO SUB CONTRACTORS:**

Embassy Corporation requires all subcontractors, vendors and/or suppliers of goods and services, to comply to the Occupational Health and Safety Act and its Regulations for Construction Projects (current edition). Subcontractors are also required as part of the Embassy Corporation subcontract agreement to comply with the Embassy Corporation Corporate Health and Safety Policy.

ANY HEALTH AND SAFETY CONTRAVENTION OBSERVED AT THE WORK SITE IS TO BE DEALT WITH IMMEDIATELY BY THE PROJECT SUPERINTENDENT OR HIS COMPETENT REPLACEMENT OR HIS/HER AUTHORIZED REPRESENTATIVE, THROUGH A DOCUMENTED WRITTEN WARNING FORM.

AS A MINIMUM SUCH WRITTEN WARNINGS SHALL INCLUDE:

- PROJECT NAME AND NUMBER
- SUB CONTRACTOR / VENDOR RESPONSIBLE

- IDENTITY OF SUBCONTRACTOR'S SUPERVISOR / SUPERVISOR IN CHARGE OF THE WORK, AND HIS SIGNATURE OF ACKNOWLEDGMENT.
- NAMES OF INDIVIDUAL VIOLATORS IF ANY
- AN EXPLANATION OF THE HEALTH AND SAFETY VIOLATION OBSERVED
- REASONABLE DATE AND TIME AS TO WHEN THE INFRACTION IS TO BE RECTIFIED
- THE SIGNATURE OF EMBASSY CORPORATION PROJECT SUPERVISOR AND THE LABOUR SAFETY REPRESENTATIVE.

In the event that a subcontractor refuses or neglects to rectify a hazardous condition, practice or any violation, the Embassy Corporation shall exercise the right to take immediate steps to correct the unsafe condition at the expense of the responsible parties. The Embassy Corporation may also remove from the work site any individual whom continues to cause the unsafe condition to remain or performs in a manner inconsistent with the guidelines of Ontario's Occupational Health & Safety Act, its Regulations or our corporate safety program.

DISTRIBUTION OF SAFETY DIRECTIVES SHALL BE AS FOLLOWS:

- COPY TO THE SUPERVISOR IN CHARGE OF THE SUBCONTRACT WORK
- COPY TO THE PROJECT SUPERINTENDENT OR HIS COMPETENT REPLACEMENT
- COPY TO THE TRADE CONTRACTOR'S HEAD OFFICE
- COPY TO EMBASSY CORPORATION PRESIDENT

4.4

ACCOUNTABILITY

Employees of Embassy Corporation including trade contractor employees working on our sites, will be held accountable for their actions and any violation of this safety policy.

<< NOTICE >>

Violations to the following represent a serious level of neglect and the Embassy project superintendent or his competent replacement has the right to exercise a “ZERO TOLERANCE” policy and have the violator(s) dismissed from the project. No further warnings are required or will be given:

Fall protection violations
Work platform use violations
Lock-out and tagging violations
Confined space work violations

A three phase disciplinary system will be exercised for all other contraventions to our policy rulings or the Occupational Health & Safety Act.

a) EMBASSY CORPORATION EMPLOYEES

1st	violation	- a recorded verbal warning
2nd	violation	- written warning
3rd	violation	- suspension or termination

b) TRADE CONTRACTOR EMPLOYEES

1st	violation	- a recorded verbal warning
2nd	violation	- written warning
3rd	violation	- dismissal from the project

c) ARCHITECTS/OWNERS AND REPRESENTATIVES

1st	violation	- a recorded verbal warning
2nd	violation	- written warning
3rd	violation	- dismissal from the project

These notices and penalties shall be enforced as written on all projects.
Dismissal of an employee shall be reviewed with a party of three:

- Embassy Corporation Project Superintendent
- Management Safety Representative
- J.H.&S. Safety Committee Labour Safety Representative member

Employee Warning Report

Employee's Name _____

Date of Warning _____

Project _____

Issued by _____

Type of Violation Safety ☐ Other ☐**Company Statement** (Supervisor's Report)

Signature _____

Employee Statement (check the appropriate statement)I agree with the Company's statement ☐I disagree with the Company's statement, for the following reasons ☐ (state below)

I have entered my statement of the above matter.

Employee Signature _____ Date _____

Witness Name _____ Signature _____

I would like to receive a copy of this statement for my records. ☐**Please be aware that this report will be kept in the personnel file.**

5.0 THE CORPORATE SAFETY EVALUATION SYSTEM:

5.1 MEASURING SAFETY PERFORMANCE AND COMPLIANCE:

The responsibilities of Managers, Supervisors, Workers and Sub-trades are broadly outlined in this Corporate Health and Safety Policy. Although responsibilities are defined, they tend to be very broad statements that are difficult to measure and accordingly, accountability is for general actions, rather than for specific tasks.

It is not a Embassy Corporation policy to keep score on Safety. However, specific and realistic measurement of individual or project performance and compliance is an ongoing concern and will, in part, be assessed through professional safety audits. On a company wide basis, since Embassy Corporation is a registered construction employer, paying Insurance premiums to the WORKERS' SAFETY AND INSURANCE BOARD of Ontario, it is vitally important that our "experience rating" be maintained and improved. Experience rating is a (WSIB) method of adjusting compensation insurance premiums based on our record of injury frequency and costs. Significant rebates are rewarded to firms whose records are better than average, while surcharges are levied against firms with poor records.

Workers' Compensation is not cheap insurance. Rebates translate into significant savings in labour costs on our projects, which make us more cost competitive. By way of example, our experience rating assessment could easily equal the salary cost of a project superintendent or his competent replacement for one year. The measure of a Company's accident prevention performance is based on how severe its injuries are (costs) and how many injuries it has (frequency).

The firm's Performance Index is the number expressing this combined performance:

Average Performance Index	0.00
Best Performance Index	+1.00
Worst Performance Index	-2.00

Over the past several years, Embassy Corporation has maintained a Performance Index of : ____ .

It will continue to be a Embassy Corporation objective is to have our supervisors achieve a positive Performance Index of not less than $P = 0.850$ on each of our projects. $P = 0.850$ indicates a better than average accident prevention performance and accordingly, significant rebates from the WORKERS SAFETY AND INSURANCE BOARD of Ontario.

6.0 EMERGENCY RESPONSE PLANNING

This plan outlines the fundamental generic aspects of emergency planning. An *EMERGENCY* is general defined as any event causing loss of life, immediate property loss or an immediate threat to the public or workers.

PROJECT EMERGENCY PLAN ANALYSIS:

Prior to mobilizing on site to do work, Embassy Corporation management will collaborate with the project superintendent in formulating an emergency response plan specific to the project. Consideration should be given to:

- transportation issues and hospital emergency routing
- hoisting and material handling, particularly as it relates to injured worker evacuation
- potential hazards involving collateral work near our operations.
- review of hazardous materials as it relates to controlled materials under WHMIS
- affects of emergency response to the public and traffic control flow

All contractors working on Embassy Corporation projects will be orientated on the project emergency procedures through a pre-construction safety meeting and through the constructor's worker orientation process.

PROJECT LAYOUT AND EMERGENCY RESPONSE INFORMATION

WORK SITE LAYOUT, ACCESS AND ROUTING:

The project layout posting should contain the following minimum information and be posted in the site trailer and at each First Aid Station:

This emergency layout and access plan should be communicated to all subcontractors:

- Location of entrances and major access routes to site
- Location of evacuation collection zone
- Location of the constructor's site office
- Location of Emergency Telephones
- Location of First Aid Stations
- Location of Washroom Facilities
- Location of storage and parking areas
- Location of Fire Hydrants
- Location of other fire protection equipment, (Eg. Fire Extinguishers)
- Location of Overhead Power Lines
- Location and Street names of streets around site

AMBULATORY ROUTE TO NEAREST HOSPITAL

The constructor shall post an ambulatory route map indicating the most direct route to the nearest hospital from the project. Emergency contact numbers must accompany this posting.

COMMUNICATING OUR EMERGENCY PROCEDURES

For any emergency response plan to be effective, these procedures must be clearly communicated to all persons involved on our projects. As soon as practical, during the on-site mobilization process, Embassy Corporation management will review the project layout and emergency access and emergency vehicles routing requirements with all trade contractor supervisors.

Embassy Corporation management will also include the project emergency response plan criteria in our safety orientation meetings with our workers prior to their commencement of work on site. Minutes of such meetings will be produced and kept on file at our offices.

WORK SITE EMERGENCY COMMUNICATIONS AND RESOURCES:

The Embassy Corporation project superintendent shall ensure all trade contractor supervisors, are briefed and aware of the emergency procedures and contact numbers to use in notifying emergency personnel. Contact numbers for the following authorities shall be posted at the site trailer:

- 911 response
- Telephone No. of local Police
- Telephone No. of local Fire Department
- Telephone No. of local Hospital Emergency Ward
- Telephone No. of nearest Ministry of Labour office

The Embassy Corporation project superintendent will determine through discussion management, the emergency retrieval equipment and first aid supplies required to effectively stabilize and package the injured for safe removal from work locations on the project. Such equipment as indicated below may be required to treat and affect a rescue or evacuation of injured worker(s):

- appropriate first aid supplies for workforce size as per WSIB regulations 1101
- spine board and basket stretcher with four way spreader slings, equipped with blankets
- rescue boxes designed to carry personnel and injured from multi-levels
- firefighting equipment stations and spill containment kits to control risks
- ventilators and other respiratory equipment necessary to move in to affect a rescue
- first aid personnel who are trained in the use of such equipment and rescue response

MAINTENANCE OF PROJECT ROUTES

It is imperative that all route ways to and from work locations are maintained for safe access and evacuation of the injured. Ambulance personnel will at times have to wheel in their rollable stretchers and equipment. Interference with emergency personnel's ability to do this will cause complications in the rescue and prompt them to report such obstructive routing to the Ministry of Labour.

EMERGENCY ALARM SYSTEMS:

The Embassy Corporation project superintendent shall establish an Alarm Alerting System protocol for the project. In any case, access to emergency communications is a must and an alarm system such as sound horn stations at key locations on the project will quicken response times. Workers will need to be orientated to the locations of the sound horn stations and the sound signaling sequences to be used in the case of an emergency.

INCIDENTS REPORTABLE TO THE MINISTRY OF LABOUR:

Specifically, an *EMERGENCY* can be any of the following incidents as prescribe in section 11 of the construction regulations for the purposes of Section 53 of the Act:

- a) Any critical injury or death as defined by the Occupational Health & Safety act.
- b) A worker falling a distance of three metres or more.
- c) A worker who falls and is arrested by a fall arrest system.
- d) A worker becoming unconscious for any reason.
- e) Accidental contact by a worker or by a worker's tool or equipment with a live electrical conductor or live electrical equipment [fuses, switches, disconnects].
- f) Contact by a backhoe, shovel, crane or similar lifting device or its load with an energized power line rated at more than 750 volts.
- g) Structural failure of all or part of false work designed by, or required by the Act or its regulations to be designed by a professional engineer.
- h) Structural failure of a principal supporting member, including a column, beam, wall or truss, of a structure.
- i) Failure of all or part of the structural supports or a scaffold.
- j) Structural failure of all or part of an earth or water retaining structure, including a failure of the temporary or permanent supports for a shaft, tunnel, caisson, cofferdam or trench.
- k) Failure of a wall of an excavation or of similar earthwork with respect to which a professional engineer has given a written opinion that the stability of the wall is such that no worker will be endangered by it.
- l) Overturning or the structural failure of all or part of a crane or similar hoisting device

DEALING WITH THE PRESS AND PUBLIC IN EMERGENCIES

The initial response to a catastrophic event on site will have a significant impact on the publicity, public relations and legal actions that follow. Giving some consideration now to your methods of dealing with an emergency will prevent the common errors made “in the heat of the moment”. Barring reporters from site or offering a “No Comment” is the *wrong way* to handle publicity as it invites the press to write only what it hears and sees. This prevents favorable facts about prompt action, public safety and relief of distress to the injured from becoming part of the early public record.

In every situation considered to be catastrophic, the following personnel are to be contacted through the Embassy Corporation head office:

1. Peter Leone Mobile: _____ Home: _____

An alternate contact would be:

2. Catherine Leone Mobile: _____ Home: _____

PRIMARY CONSIDERATIONS:

Stabilize the situation to the extent possible:

- ensure medical assistance is provided
- preserve the accident scene
- ensure no further damage occurs by:
 - cutting off power, gas, water lines, ect.
 - shore, brace, secure or stabilize area from further damage
 - isolate the area where it is not practical or safe to stabilize
 - insure the public and/or workers are protected

Restore access and services as soon as possible when permitted by the authority in charge – eg. Police, Fire Department, Ministry of Labour, Gas Company, Utility Company, Property Owner or Agent ...

Comply immediately with any instruction or order given by the authority in charge, eg. – Police, Fire Department, Ministry of Labour, Gas Company, Utility Company, Property Owner or Agent ...

The **Press Liaison** person for Embassy Corporation should be one designated person only (*usually from management*) to provide information to the press. Instruct all employees and trade contractors not to provide information to the press but to direct them to the designated spokesperson [project superintendent]. This information should be provided at the time of hiring, transferring or mobilization. The designated **Corporate Liaison** spokesperson for which follow up and background information can be obtained from the press and authorities will be:

Peter Leone ---- Mobile: _____ Home: _____

Press Liaison code of conduct:

- Do **not** speculate
- Do **not** assess blame or fault
- Do **not** use unnecessarily inflammatory language when describing the situation
 - eg. refer to it as an emergency not a disaster.
- Do provide the names and telephone number of the designated corporate spokesperson who will provide follow up and background information to the press and authorities.
- Do provide the designated corporate spokesperson with accurate information as soon as it becomes available. Names, ages, addresses, occupations, etc. of the injured parties. Also all pertinent information relating to the actual situation – who, what, where, when, how. Include actions taken or planned. Retain all information relating to the emergency services attending the site. Service, name, rank, actions, follow up, etc....

EVACUATION CONTINGENCY PLAN:

The Embassy Corporation project superintendent will collaborate with management in organizing a suitable evacuation contingency plan and follow the response procedures if personnel are required to vacate the project buildings due to emergencies.

In a critical emergency (eg.- uncontrollable fire), the evacuation plan should contain the minimum as follows:

- Evacuate the site and office areas through the nearest exits (see site layout).
- Meet in a designated gathering zone as stipulated in the evacuation layout plan, as far from the fires, spills, or other hazard as necessary so a head count can be taken. Notify adjoining neighbors. This will be appropriately integrated with external authorities (police, fire department).
- The Embassy Corporation project superintendent shall notify the Embassy Corporation head office immediately of the fire, spill or other hazard. The Embassy Corporation project superintendent will be responsible to ensure our emergency responses procedures and evacuation plan are appropriately exercised on the project.

DEBRIEFING AND POST-TRAUMATIC STRESS PROCESS:

Following any emergency event and based on its severity, a follow-up debriefing meeting will be held with those people involved, who may have been psychologically affected by the traumatic event. A senior member of Embassy Corporation management will hold a debriefing session and determine the need for professional counseling for those experiencing post-traumatic stress. If needed such professional counseling will be provided to those affected.

HAZARDOUS SPILLS CONTINGENCY PLAN

In the event of a hazardous spill, the following contacts should be made:

- SPILLS CO-ORDINATOR: _____ - Mobile: _____

<< EMERGENCY RESPONSE >>

1. Ensure no danger to personnel - Evacuate then from the spill scene.
2. Assess the situation and notify the site spills coordinator.
3. The spills coordinator shall notify his senior management.
4. The site spills coordinator shall assess the situation and call the Spills Action Centre and provide notification and any other related information they request.

SPILLS ACTION CENTER EMERGENCY PHONE NUMBER: 1-800-268-6060

5. The spills coordinator shall begin organizing the containment and removal of the hazardous spill through the assistance of the local authorities and the Spills Action Centre Duty Officer.
6. The spill action coordinator shall contact and notify the owner of the property.
7. Clean-up efforts shall be dictated by the requirements set out by the Federal, Provincial and / or Municipal authorities.

FIRE PROTECTION POLICY:

Localized or minor fires may be handled by trade workers, trained in how to properly use fire extinguishing equipment.

- a) Fire extinguishers shall be readily available near all open-flame operations, including welding operations, fuel fired equipment, where combustible or flammable liquids are stored, handled or used, and at each workshop of 300 or fewer square meters of floor area. All trades to comply.
- b) Fire extinguishers are to be marked with their appropriate manufacturer symbols designating its class and use and its W.H.M.I.S. supplier label. The fire extinguishers are to be routinely inspected on a monthly basis and tagged as such, indicating the date of inspection and by whom. 4A40BC class fire extinguishers are required.
- c) CLASSIFICATION OF DRY CHEMICAL FIRE EXTINGUISHERS:

Class A
Ordinary flammable

Trash Cloth
Wood Rubber
Paper Plastics

Class B
Flammable liquids and Gases

Oils Gasoline
Oil based paints Propane
Acetylene Gases
Solvents

Class C
Electrical

Motors
Switch-gears
Electrical Panels
Electrical Wiring

TRAFFIC CONTROL PLANNING:

In some instances where the maneuvering of vehicular traffic poses risks to workers or the public, there will be a requirement for our supervisors to devise a Traffic Control Plan as specified as per section 67 (4) & (5) of Ontario's Regulations for Construction Projects. The plan shall be in writing, outlining the hazards associated and the measures to be taken to protect workers from vehicular traffic. The written traffic control plan must remain on the project and provided to a Ministry of Labour inspector if requested.

The traffic control plan shall be developed in writing and implemented and shall specify the identified hazards and the control measures to be used to adequately protect the workers.

Such measures as:

- | | |
|-------------------------|--|
| 1. Barriers | 8. Traffic control devices |
| 2. Barricades | 9. Blocker trucks |
| 3. Delineators | 10. Crash trucks |
| 4. Lane control devices | 11. Sign trucks |
| 5. Warning signs | 12. Speed control devices |
| 6. Flashing lights | 13. Longitudinal buffer areas |
| 7. Flares | 14. Trained traffic control persons |

Such traffic control planning requires us to minimize the need for our construction vehicles to back up. When vehicles must back up, our supervisors are expected to have competent signalers available to assist the operators.

A worker who is required to direct vehicular traffic, shall be a competent worker and shall not perform any other work while directing vehicular traffic. The worker (traffic control person) shall be positioned in such a way that he or she is endangered as little as possible by vehicular traffic and shall be given adequate written and oral instructions, in a language that the he or she understands, with respect to directing vehicular traffic, and those instructions shall include a description of the signals that are to be used.

1. A worker acting as a Traffic Control Person shall not direct traffic for more than one lane in the same direction.
2. A worker acting as a Traffic Control Person shall not direct traffic if the normal posted speed limit of the public way is more than 90 kilometres per hour.

Police officers are required in situations where multi-lane traffic must be controlled for the progress of our work.

7.0 HEALTH AND SAFETY TRAINING & ORIENTATIONS:

7.1 SAFETY ORIENTATION:

It is a Embassy Corporation policy that each trade contractor ensure its workers engaged on our projects, are aware of:

- Their obligations under the Occupational Health and Safety Act.
- Specific hazards of their work and that of the project.
- Embassy Corporation safety policies and procedures.

It is a Embassy Corporation policy during pre-award negotiations with any trade contractor, that the trade contractor be made aware of and become contractually bound to the Embassy Corporation Health & Safety Policy. This process fosters the desired attitudes and reinforce the Embassy Corporation commitment to a safe work environment. The project superintendent or his competent replacement in collaboration with the project manager shall ensure that all employees, direct or sub-contractual, are orientated to our safety policy and program. Personal protective skills in the proper use of safety equipment and in construction hazards recognition, specific to the project should be communicated to all employees before commencement of work.

CONTRACTOR NOTIFICATION PROCEDURES:

No contractor shall commence work on a Embassy Corporation work site until expressed written permission is given by a management member of Embassy Building Corporation. The hours of operation for the project will be clearly specified in our contracts with the contractor and it is the responsibility of each contractor to notify Embassy Corporation management of their request to work beyond these specified hours of operation. Again, no work shall commence until expressed written permission is given.

7.2 SAFETY TRAINING:

The Embassy Corporation objective is to deliver health and safety related training to our direct hired employees in our organization. Some of the safety related training courses available are:

- SUPERVISOR SAFETY LEADERSHIP PROGRAMS
- FIRST AID AND CARDIO-PULMONARY RESUSCITATION (CPR)
- HEALTH AND SAFETY REPRESENTATION CERTIFICATION TRAINING
- W.H.M.I.S. – [WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM TRAINING]
- CONSTRUCTION SAFETY ACT AND REGULATIONS "DUE DILIGENCE" TRAINING
- SITE SAFETY ORIENTATION AND HAZARDS RECOGNITION
- ACCIDENT INVESTIGATION AND REPORTING PROCEDURES
- PROPANE HANDLER'S CERTIFICATION TRAINING
- FALL PROTECTION SYSTEMS CERTIFICATION TRAINING
- TRAFFIC CONTROL AND SIGNALMAN'S TRAINING

7.2 **WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM:**

The Canada-wide Workplace Hazardous Materials Information System (W.H.M.I.S.) is designed to ensure that all workers have access to information about Hazardous Materials used, stored, handled or disposed of in the workplace. In order to meet the requirements of the (W.H.M.I.S.) regulations, Embassy Corporation requires all employees, including all Trade Contractors, to be W.H.M.I.S. trained, both fundamentally and specifically of the hazardous materials being used on our sites. No controlled materials shall be handled, stored, used or disposed of on our sites unless the proper labeling and Material Safety Data Sheets of such materials are on site and made readily available to the workers. On an annual basis Embassy Corporation shall re-assess the W.H.M.I.S. training needs of their employees and retrain if necessary.

The W.H.M.I.S. System requires that all persons exposed to, likely to be exposed to or will be in close proximity to, hazardous materials classified as "controlled products" under W.H.M.I.S. - receive instruction and training to protect their health and safety. The three main elements to this education delivery shall consist of:

- a) MSDS Material Safety Data Sheets - Workers to be made aware of the detailed information contained in these sheets.
- b) Labels Workers must be able to read and understand the contents of supplier and workplace container labels.
- c) Education Specific training in the use, handling, storage and disposal of W.H.M.I.S. controlled products must be provided to the workers of their protection. All training whether generic or specific, should be arranged in consultation with the Joint Health and Safety Committee or the company labour safety representative.

All Embassy Corporation project superintendents or their competent replacements shall implement the following WHMIS Compliance Plan on their projects to ensure our subcontractor and employee personnel remain compliant to Ontario's W.H.M.I.S. Regulations. No worker shall be allowed to be present on our projects unless Generic W.H.M.I.S. training has been provided to every worker.

All subcontractor companies shall provide written evidence of W.H.M.I.S. training for those workers to be assigned to our projects. These training records shall be forwarded to the project superintendent for review and filing.

In keeping to regulatory standards, Embassy Corporation management will ensure that all employees are annually updated to our W.H.M.I.S. training program.

7.3

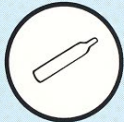







W.H.M.I.S. COMPLIANCE PLAN

[WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM]

1. All workers entering the project shall carry proof of W.H.M.I.S. Training.
2. All trade contractors shall provide un-expired Material Safety Data Sheets for all W.H.M.I.S. controlled products to be brought on site, to the Embassy Corporation project superintendent or his competent replacement, before these W.H.M.I.S. controlled products are stored or used on the project. All trade contractors shall ensure W.H.M.I.S. controlled products have their required supplier and workplace labels affixed to the outer containers.
3. All trade contractor supervisors are to provide site-specific instruction to their workers on the storage, handling, use and disposal of any W.H.M.I.S. controlled products brought on site. The Embassy Corporation project superintendent or his competent replacement will require each trade contractor to provide written evidence, workers have received generic and site specific instruction for their workers and safety.
4. The Embassy Corporation project superintendent or his competent replacement will post all M.S.D.S. documents in a conspicuous area to allow unrestricted access and review to all workers on the project.
5. All trade contractors are to use the designated storage areas provided to them by Embassy Corporation Any W.H.M.I.S. controlled products not in use shall be kept under storage. Appropriate fire extinguisher equipment shall be provided near these storage areas.
6. The Embassy Corporation project superintendent or his competent replacement, in consultation with our Joint Health and Safety Committee, shall periodically review the suitability of the W.H.M.I.S. training and practices in place by the trade contractors on site, keeping in mind that the results of such training and instruction provided, must enable the workers to use the information in a performance based manner to protect their health and safety.
7. All trade contractors shall have written procedures to be followed by their workers, where fugitive emissions from a controlled product, poses a risk to the workers health and safety.
8. All trade contractors shall also have written procedures to be followed by their workers in case of an emergency involving a controlled product.
9. Failure to follow safe work procedures in the use, storage, handling or disposal of a controlled product by a trade contractor employee, will cause disciplinary measures to be taken against the worker and supervisor of the trade contractor.

W.H.M.I.S. Hazard Classification

All suppliers of W.H.M.I.S. controlled materials must classify their hazardous products into one of the following hazard classification symbols:

CLASS	SYMBOL	EXAMPLE
Class A: Compressed Gas		oxygen
Class B: Flammable and Combustible Material		solvents
Class C: Oxidizing material		epoxy hardeners
Class D: Poisonous and Infectious Material		
1. Materials causing immediate and serious toxic effects		ammonia
2. Materials causing other toxic effects		asbestos
3. Biohazardous Infectious Material		contaminated blood products
Class E: Corrosive Material		hydrochloric acid sodium hydroxide
Class F: Dangerously Reactive Material		acetylene

One of more of these hazard classification symbols will appear on the W.H.M.I.S. supplier label of a W.H.M.I.S. controlled product.

8.0 CONSTRUCTION PROJECT INSPECTIONS AND REPORTS:

8.1 PROJECT SAFETY INSPECTIONS:

It is a Embassy Corporation policy to perform work in the safest possible way, consistent with good construction practice. The Health and Safety of all members of the construction team, the general public and associated properties are the responsibility of all supervisory personnel. To ensure the safest possible conditions exist on our projects, all personnel associated to the construction team must understand and strictly adhere to the Embassy Corporation health and safety policy procedures, the Occupational Health and Safety Act, and provincial / municipal regulations of construction projects.

Embassy Corporation reserves the right to remove anyone who causes an unsafe condition to exist, or who refuses or neglects to perform in a manner consistent with Ontario's safety statutes and our safety policy.

As a means to enhance safe working conditions and practices on our projects, and to prevent accidents from happening, safety inspections shall be conducted at all Embassy Corporation work sites regularly. These regular safety inspections shall be conducted either by a Embassy Corporation management member or by a professional safety consultant.

The recognition and reporting of hazardous conditions and practices is everyone's responsibility on our work sites. The project superintendent or his competent replacement shall ensure such hazardous conditions or practices brought to his attention are rectified in a timely manner.

From time to time, unannounced safety inspections may be conducted by a Embassy Corporation management member or by a professional safety consultant to assess the effectiveness of our safety program. Inspection reports produced by independent safety inspectors or management personnel shall be reviewed and signed by the project superintendent or his competent replacement. Copies of these project safety inspection reports will be distributed to the project superintendent or his competent replacement, Construction Manager of Operations and to the Consultant who conducted the site inspection and posted on the site bulletin board for review by worker and safety committee members.

8.2 SAFETY REPORT FORMS:

Refer to our index of standard safety forms in the back pocket of this binder.

The Supervisor shall initiate the completion of any of these forms, by signing them and supporting its implementation by other members of management.

8.3 SAFETY PUBLICATIONS AND POSTINGS:

MAINTAINING A HIGH SAFETY AWARENESS LEVEL AMONG WORKERS

Embassy Corporation will from time to time, provide periodicals, bulletins or posters to inform all our personnel and sub-trades of construction health and safety issues. An important part of our safety performance measurement is the calculation of "INJURY FREQUENCY RATES". Every attempt should be made to keep these figures low. This can only be achieved by keeping all Embassy Corporation employees and sub-trades informed of problems regarding health and safety and advising everyone of our ongoing health and safety strategies. Materials such as safety signs, posters, accident scenario bulletins, safety publications, etc., shall be posted about the work site.

9.0 HOUSEKEEPING POLICY:

Embassy Corporation will not tolerate an untidy worksite. It is the responsibility of each direct and subcontractual project superintendent to clean-up his or her respective work areas and routeways t on a daily basis or as often as necessary to maintain a clean and unobstructed condition.

If for any reason such clean-up does not occur, Embassy Corporation will undertake the clean-up work on behalf of the delinquent sub-contractor and back-charge accordingly. No warnings need be for such action, however, our standard clean-up directive may be used *initially* to order sub-contractor employers of their responsibility and of our intended action. Routeways shall be maintained at all times and appropriate measures shall be taken to isolate waste disposal areas and bins from public access.

10.0 TOOLS, EQUIPMENT & VEHICLE MAINTENANCE:

10.1 EQUIPMENT MAINTENANCE AND MANAGEMENT PROGRAM:

Due to the nature of our projects and the contractual relationship with our clients, there are at times major items of capital equipment owned and maintained by the Embassy Corporation The project superintendent or his competent replacement is responsible to ensure that all equipment located on the work site is maintained in a safe operating condition and meets or exceeds all requirements of the Occupational Health and Safety Act and it's Regulations, as it pertains to log books, certificates of authorization, service records and safe operating procedures.

All sub-contractors shall ensure their equipment is similarly maintained as above and periodic checks will be made by the project superintendent or safety representatives to ensure all safety standards and regulatory requirements are being complied to. Any motorized equipment of ten horsepower or more shall carry its

manufacturer's safe operation manual and relevant operation placards. When the project superintendent or his competent replacement transfers or assigns equipment into the control, operation, care or authority of other authorized person(s), the project superintendent or his competent replacement shall ensure that all applicable legislation pertaining to such equipment, is complied with before such transfer.

Defective Tagging Program:

A defective equipment tagging system shall be implemented by all crew foremen and any equipment requiring repair or replacement (at the judgment of the crew foreman or other competent person) shall be tagged.

Such tags shall include:

- The name of the person tagging the equipment.
- The date and time of removal from service.
- The description of the problem with the piece of equipment.

NOTIFICATION AND TAGGING PROCEDURE:

Once a worker or supervisor recognizes a piece of equipment is not functioning properly or exhibits defects, the equipment shall be tagged as defective and sent to our shops or a qualified facility for repair. The worker shall notify the supervisor so he or she can place a defective tag that is made up of the following:

A red rectangular tag with a white border. At the top, it says "OUT OF SERVICE" in bold black letters. Below this, there are five horizontal lines for text, each preceded by a label: "DATE", "SER.#", "LOCATION", "PROBLEM", and "SIGNED BY:". At the bottom, there is a small line of text: "© 1999/01/01 SIGNMAKING DIV. CATALANES INC. 00781".

the defective tag shall be red in colour and exhibit the words "OUT OF SERVICE"

the defective tag shall have space on it to record the issuer's name, date of tagging and nature of the defect.

A green rectangular tag with a white border. At the top, it says "O.K. TO USE" in bold black letters. Below this, there are six horizontal lines for text, each preceded by a label: "JOB NO.", "P.O. NO.", "DESCRIPTION", "QUANTITY", "BY", and "DATE". At the bottom, there is a small line of text: "© 1999/01/01 SIGNMAKING DIV. CATALANES INC. 00781".

the approval tag shall be green and exhibit the words, "OK TO USE"

the approval tag shall have space on it to record the issuer's name, date of tagging and description, issuer's name

All tools, equipment or vehicles owned and/or operated by sub-contractor companies on a Embassy Corporation work site shall also be maintained in first class working condition and a defective tagging system implemented also. The sample equipment inspection log sheet below could be used to keep accurate records of service and maintenance.

Sample Inspection & Maintenance Log Sheet

9.0 INSPECTION AND MAINTENANCE LOG

DATE OF MANUFACTURE: _____

MODEL NUMBER: _____

DATE PURCHASED: _____

INSPECTION DATE	INSPECTION ITEMS NOTED	CORRECTIVE ACTION	MAINTENANCE PERFORMED
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			
Approved By: _____			

11.0 ACCIDENT/INCIDENT INVESTIGATING AND REPORTING:

11.1 ACCIDENT/INCIDENT INVESTIGATION PROGRAM:

It is an Embassy Corporation policy that any incident likely to cause an accident such as a near miss, or any injury resulting from an accident, is to be promptly reported to the project superintendent or his competent replacement and investigated forthwith. Injuries or incidents caused by or involving subcontractors on our projects, shall be investigated and recorded on an accident investigation report by the subcontractor supervisor. The report shall contain all pertinent information and include the future preventative measures to prevent a recurrence. The subcontractor accident or incident investigation report shall be submitted to the Embassy Corporation project superintendent or his competent replacement within TWENTY-FOUR HOURS of the occurrence. The project superintendent or his competent replacement is responsible of evaluating the cause of all incidents or accident and the possible effect on other workers doing similar tasks, so that suitable preventative measures can be implemented.

11.2 EMERGENCY RESPONSE AND NOTIFICATION PROCEDURES:

Incidents that have occurred on any Embassy Corporation work site which fall within the following injury categories shall be reported to senior management as soon as practicable by telephone or facsimile. Immediately following the accident or incident, a supervisor's accident investigation report form is to be completed and signed by the project superintendent or his competent replacement and forwarded to the Embassy Corporation Manager of Construction Operations and President. It is extremely important for our supervisory personnel to report these injuries as there are legal requirements of management to notify the appropriate authorities.

11.2

NOTIFICATION PROCEDURES

A) FATALITY/CRITICAL INJURIES:

When an accident occurs and results in the critical injury or death of a worker, the following contacts must be notified immediately:

1. Embassy Corporation project superintendent
2. Embassy Corporation MANAGER OF OPERATIONS
3. Embassy Corporation PRESIDENT
4. THE NEAREST PROVINCIAL MINISTRY OF LABOUR OFFICE
5. THE DIRECT EMPLOYER OF THE INJURED
6. OUR PROFESSIONAL SAFETY CONSULTANT

B) MEDICAL AND LOST TIME INJURIES:

When an accident occurs which results in an injury requiring medical aid to a worker, the following contacts should be notified:

1. Embassy Corporation project superintendent
2. Embassy Corporation MANAGER OF OPERATIONS
3. Embassy Corporation PRESIDENT
4. THE NEAREST PROVINCIAL MINISTRY OF LABOUR OFFICE
5. THE DIRECT EMPLOYER OF THE INJURED
6. OUR PROFESSIONAL SAFETY CONSULTANT

C) FIRST AID INJURIES:

For minor injuries requiring First Aid, the following contacts should be notified:

1. Embassy Corporation project superintendent
2. Embassy Corporation MANAGER OF OPERATIONS
3. THE SUPERVISOR OF THE INJURED WORKER
4. THE EMPLOYER OF THE INJURED WORKER

D) NEAR MISS INCIDENTS WITH INJURY or PROPERTY DAMAGE POTENTIAL:

1. Embassy Corporation project superintendent
2. Embassy Corporation MANAGER OF OPERATIONS
3. Embassy Corporation PRESIDENT
4. THE DIRECT EMPLOYER INVOLVED
5. MINISTRY OF LABOUR IF REQUIRED, UNDER THE ACT AND REGULATIONS
6. OUR PROFESSIONAL SAFETY CONSULTANT

11.3

INJURY RESPONSE PROCEDURES

INJURIES REQUIRING FIRST AID ONLY:

1. HAVE THE DESIGNATED FIRST AID ATTENDANT TREAT THE INJURED PERSON AND RECORD THE PARTICULARS IN THE FIRST AID TREATMENT LOG BOOK.
2. INFORM THE INJURED PERSON TO NOTIFY HIS SUPERVISOR OR HEAD OFFICE IMMEDIATELY IF, DUE TO COMPLICATIONS, HE VISITS HIS/HER DOCTOR.
2. PROVIDE THE INJURED PERSON WITH A TREATMENT MEMORANDUM IF THERE IS ANY POSSIBILITY HE MAY VISIT HIS DOCTOR AND INSTRUCT HIM/HER TO SIGN AND GIVE THE MEMORANDUM TO HIS/HER DOCTOR TO FILL OUT. THE TOP COPY OF THIS FORM SHOULD BE RETURNED TO THE EMPLOYER BY THE INJURED ON THE NEXT DAY.

INJURIES REQUIRING MEDICAL AID:

1. PROVIDE IMMEDIATE FIRST AID TREATMENT AND ARRANGE OF THE TRANSPORTATION OF THE INJURED TO A MEDICAL FACILITY.
2. ESCORT THE INJURED PERSON TO A MEDICAL FACILITY. HAVE THE INJURED PERSON SIGN THE TREATMENT MEMORANDUM AND GIVE IT TO THE DOCTOR TO FILL OUT.
3. PRESERVE THE ACCIDENT SCENE OF AN ACCIDENT INVESTIGATION.
4. PHONE SENIOR MANAGEMENT AND REPORT THE CIRCUMSTANCES.
5. THE SUPERVISOR MUST INVESTIGATE THE ACCIDENT AND REPORT IN WRITING. SENIOR MANAGEMENT MAY HOWEVER ELECT TO FOLLOW-UP WITH A PROFESSIONAL INVESTIGATION. THE INITIAL INVESTIGATION SHOULD BE COMPLETED WITHIN TWENTY FOUR HOURS.
6. FOLLOW-UP ATTENTION ON THE INJURED PERSON'S PROGRESS, THE WSIB CLAIM STATUS AND TO RAPID-RE-EMPLOYMENT (MODIFIED DUTIES) SHOULD BE PERFORMED.

THEREFORE, ANY FIRST AID TREATMENT WHICH BECOMES A MEDICAL SITUATION MUST BE REPORTED BY THE INJURED TO HIS SUPERVISOR OR HEAD OFFICE IMMEDIATELY SO THE PROPER WSIB FORMS CAN BE PROCESSED.

11.4

EMERGENCY RESPONSE PROCEDURES

for

CRITICAL INJURIES OR FATALITIES

1. ASSESS THE SITUATION CALMLY AND TAKE COMMAND.
2. PROTECT THE ACCIDENT SCENE FROM FURTHER HAZARDS, SUCH AS FIRE, LIVE WIRES, TRAFFIC, OPERATING MACHINERY, ETC.
3. PROVIDE FIRST AID TO THE INJURED, IF ANY, AS SOON AS POSSIBLE AND KEEP THE INJURED PARTY WARM.
4. ARRANGE FOR IMMEDIATE MEDICAL HELP:
Call the Ambulance at _____.
Call the Police at _____.
5. CALL THE CORPORATE HEAD OFFICE AT 905 660-7366 AND ADVISE EMBASSY CORPORATIONS OR MANAGEMENT SO THEY CAN CONTACT THE MINISTRY OF LABOUR IMMEDIATELY AND NOTIFY THE INJURED PERSON(S) RELATIVES.
6. NOTIFY THE SAFETY REPRESENTATIVE/SAFETY COMMITTEE AND LOCAL UNION OFFICE (IF APPLICABLE).
7. HAVE SOMEONE MEET AND DIRECT THE AMBULANCE TO THE ACCIDENT SCENE.
8. FOR FOLLOW-UP PURPOSES, FIND OUT WHICH HOSPITAL THE INJURED WILL BE TAKEN TO AND HAVE SOMEONE THERE.
9. ISOLATE THE ACCIDENT SCENE BY BARRICADE, ROPE, CAUTION TAPE, ETC. AND POST A GUARD TO MAKE SURE NOTHING IS TAMPERED WITH UNTIL THE AUTHORITIES ARRIVE ON THE SCENE AND ALL INVESTIGATIONS ARE COMPLETED.
10. CO-OPERATE FULLY WITH ALL EMERGENCY RESPONSE CREWS AND MINISTRY OF LABOUR PERSONNEL.

NOTE:

ONCE THE INJURED HAVE BEEN EFFECTIVELY LOOKED AFTER AND THE AUTHORITIES INFORMED, THE SITE SUPERVISOR AND HIS/HER ASSISTANTS SHOULD BEGIN THEIR OWN INVESTIGATION AND OBTAIN WITNESS STATEMENTS WITHOUT DISTURBING THE ACCIDENT SCENE AND THE MINISTRY OF LABOUR'S OWN INVESTIGATION.

11.5

CRITICAL INJURIES DEFINED

FOR THE PURPOSE OF THE OCCUPATIONAL HEALTH AND SAFETY ACT AND ITS REGULATIONS, "CRITICAL INJURY" MEANS AN INJURY OF A SERIOUS NATURE THAT:

1. PLACES LIFE IN JEOPARDY.
2. PRODUCES UNCONSCIOUSNESS.
3. RESULTS IN SUBSTANTIAL LOSS OF BLOOD.
4. INVOLVES THE AMPUTATION OF A LEG, ARM, HAND, OR FOOT BUT NOT A FINGER OR A TOE.
5. INVOLVES THE FRACTURE OF A LEG, ARM, HAND, OR FOOT BUT NOT A FINGER OR A TOE.
6. CONSISTS OF BURNS TO A MAJOR PORTION OF THE BODY.
7. CAUSES LOSS OF SIGHT IN AN EYE.

NOTE: *ANY TIME AN INJURED WORKER IS TAKEN BY OUTSIDE EMERGENCY SERVICES, WE WILL ASSUME THE INJURY TO BE CRITICAL IN NATURE.*

PRESERVATION OF THE ACCIDENT SCENE

WHERE A PERSON IS KILLED OR CRITICALLY INJURED AT THE WORKPLACE, NO PERSON SHALL, EXCEPT OF THE PURPOSES OF:

- A) SAVING LIFE OR RELIEVING HUMAN SUFFERING;
- B) MAINTAINING AN ESSENTIAL PUBLIC SERVICE OR A PUBLIC TRANSPORTATION SYSTEM;
- C) PREVENTING UNNECESSARY DAMAGE TO EQUIPMENT OR OTHER PROPERTY;

INTERFERE WITH, DISTURB, DESTROY, ALTER OR CARRY AWAY ANY WRECKAGE, ARTICLE OR THING AT THE SCENE OF OR CONNECTED WITH THE OCCURRENCE UNTIL PERMISSION TO DO SO HAS BEEN GIVEN BY AN INSPECTOR OF THE MINISTRY OF LABOUR.

11.6

REPORTING A CRITICAL INJURY TO THE AUTHORITIES

MANAGEMENT RESPONSIBILITIES:

Where a person is killed or critically injured from any cause at a workplace, the constructor if any, and the employer shall notify an inspector from the MINISTRY OF LABOUR, in addition to the safety committee, health and safety representative and trade union, if any, immediately of the occurrence by telephone, telegram, or other direct means and the employer shall within forty-eight hours after the occurrence, send to the director (MINISTRY OF LABOUR), a written report of the circumstances of the occurrence containing such information and particulars as the regulations may prescribe.

[section.51(1) – O.H.& S. Act 213/91]

THE REPORT SHALL INCLUDE THE FOLLOWING:

1. NAME AND ADDRESS OF THE EMPLOYER AND CONSTRUCTOR.
2. THE NATURE AND CIRCUMSTANCES OF THE OCCURRENCE AND A DESCRIPTION OF THE BODILY INJURY SUSTAINED.
3. A DESCRIPTION OF THE EQUIPMENT AND/OR MACHINERY INVOLVED.
4. THE TIME AND PLACE OF THE OCCURRENCE.
5. THE NAME AND ADDRESS OF ALL WITNESSES TO THE OCCURRENCE.
6. THE NAME AND ADDRESS OF THE PERSON WHO WAS KILLED OR CRITICALLY INJURED.
7. THE NAME AND ADDRESS OF THE PHYSICIAN OR SURGEON, IF ANY, BY WHOM THE PERSON WAS OR IS BEING ATTENDED OF THE INJURY.
8. THE STEPS TAKEN TO PREVENT A RECURRENCE.

IMPORTANT: *CONTACT THE AUTHORITIES:*

- A) IMMEDIATELY BY TELEPHONE, FACSIMILE, ETC. and
- B) PROVIDE A WRITTEN REPORT OF OCCURRENCE TO THE MINISTRY OF LABOUR WITHIN FORTY EIGHT (48) HOURS.

12.0 EARLY AND SAFE RETURN TO WORK POLICY

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

The Embassy Corporation will uphold its responsibility for keeping the Workplace Safety and Insurance Board (W.S.I.B.) informed of the availability of modified work and of the worker's progress during the return to work and the rehabilitation process.

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

This modified plan may include:

- Altered or reduced work hours
- Changes to the worker's shift
- Modifications to the regular job duties
- Alterations to rest period(s) or exercise break(s)
- Temporary re-assignment to a different job
- Matching the worker's functional abilities to a totally different job.

12.1 RESPONSIBILITY ROLES:

Both the Worker and the Employer have a responsibility to co-operate in an ESRTW (**E**arly and **S**afe **R**eturn **T**o **W**ork) Plan. These responsibilities are:

The Worker shall:

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

The Supervisor shall:

- 1) Promote and participate in the objectives of the program and discuss objectives with the employee(s).
- 2) Provide ESRTW Plans to workers in their assigned areas.
- 3) Assist in the collection of medical information, job description(s) for job task analysis, and the development and implementation of workplace modifications.
- 4) Monitor the progress of all workers participating in an ESRTW plan and maintain records of the worker's progress and up -to-date restrictions.

Management shall:

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

12.2 PROCEDURES TO IMPLEMENT AN ESRTW PLAN:

- 1) When medically supported information comes forward that the employee is able to commence with an ESRTW plan, a personalized plan shall be developed.
- 2) A suitable modified position will be identified by the employer to ensure that the position is within the worker's functional abilities so as to prevent re-injury or aggravation to the worker's condition.
- 3) The worker must provide the employer with a "Health Professional/Health Care Practitioner's" letter of clearance to return to modified work, by providing an up to date "Functional Abilities Form: (FA) on a timely basis, as prescribed in the Workplace Safety and Insurance Act, 1997. Employees may be required to attend an independent medical review to determine their physical capabilities in order to perform the required duties.
- 4) When medical clarification is required, various specialists may be consulted to ensure that the worker is able to perform the assigned task(s).

- 5) Employees may be required to return to work on a graduated basis, (for example: commencing at four hours per day until eventually reaching the regular work hours per day, on a gradual basis). Overtime hours are not available to workers on a modified work plan.
- 6) An ESRTW plan shall be closely monitored to ensure no further disability is developing and to ensure that the worker's physical restrictions are being fully respected.
- 7) Supervisory personnel may provide modified work for a duration agreed to by management. The company physician may be consulted for advice regarding modification of restrictions and duration of the ESRTW plan.

12.3 MODIFIED WORK & VOCATIONAL REHABILITATION

The Workplace Safety & Insurance Board has long supported the belief of early rehabilitation via a *Early and Safe Return to Work Program*. Such a program may include *graduated work* and/or *modified duties*, which will help the worker, recuperate more quickly. Failure to fully participate in our *Early and Safe Return to Work Program* can effectively cancel a claim by W.S.I.B.

MODIFIED WORK:

Modified work is any job or combination of tasks that an employee, who suffers from a partial disability, may perform on a temporary basis without risk of re-injury to them or others. This work may consist of regular tasks that have been changed or redesigned for an employee participating in a modified work program. There may be a reduction in time or volume of work performed, however, the work must be productive and the results must have value.

MODIFIED DUTIES: General modified duties can include but are not limited to;

- a. Work in the office, shop, site office,
- b. Housekeeping activities,
- c. Inventory control,
- d. Supervisory assistance or work helper,
- e. Work at normal job with a helper,
- f. Records control or shipping and receiving.

Modified duties will be cleared with the worker the treating physician and the WSIB case worker to ensure that appropriate measures are in place to help the worker to a speedy recovery. A sample treatment memorandum form below, illustrates the type of information requested from the attending physician and lists examples of light duty [modified work] that can be offered to workers. Please ensure the worker signs in the upper right hand corner of the treatment memorandum form, before he leaves the site to visit the doctor. A copy of the signed form should be transmitted to the Workers Safety and Insurance Board for their records.

TREATMENT MEMORANDUM

I hereby authorize the release
of medical information to my employer

EMPLOYEE SIGNATURE

Dear Doctor:

In order for the Embassy Corporation to fulfill our obligations to the Workers Safety and Insurance Board, we ask that you complete this form and have the employee return it to his/her employer.

Please Print:

Name: _____ claims to have suffered an illness/injury while in our employ
on _____.

Attending Physician _____ Phone: _____

Address of Physician _____

PHYSICIAN'S ASSESSMENT AND RECOMMENDATIONS:

Nature of problem and diagnosis: _____

1. Employee may return at once to normal work. Yes? _____.
2. Employee is unable to work. Yes? ____ For how long? _____
3. Employee may return to modified duties? Yes ____
Estimated duration of modified duties: _____ days _____ weeks.

RESTRICTIONS:

_____ lifting weight(specify) _____ lbs.
_____ prolonged walking
_____ prolonged standing
_____ climbing
_____ repetitive action (specify) _____
_____ overhead work

MODIFIED WORK:

Employee may do

_____ office work (e.g. - filing, filling "job card" accessory lists, bookkeeping, etc.)
_____ pulling nails from lumber, light material sorting
_____ light cleaning, sweeping, janitorial work in shops
_____ light indoor shop work, working at table or bench
_____ security work
_____ fire watch, safety watch
_____ small parts and equipment painting
_____ cleaning engine parts, tools, and equipment

TREATMENT:

Does employee require further treatment? Yes ____ No ____ Time period for next visit? _____

COMMENTS: _____

WE THANK YOU FOR YOUR ASSISTANCE AND CO-OPERATION IN ATTENDING TO OUR EMPLOYEE AND IN COMPLETING THIS FORM.

SIGNATURE OF ATTENDING PHYSICIAN

DATE

12.4

INJURY CLAIMS MANAGEMENT PROGRAM

[Modified work and Vocational Rehabilitation]

This program is designed to reduce the effects of a work-related accident or illness. Its success depends on communication and the worker's return to the pre-incident job position or to a "modified or "rehabilitative" job is the only measure of success.

EMBASSY CORPORATION POLICY AND INVOLVEMENT:

It is Embassy Corporation policy to become involved in the worker's accident from the very beginning. Once the worker has been attended to medically and all aspects of the accident investigation has been completed, the employer should consult with the medical practitioner regarding the injured worker's ability to participate in Embassy Corporation management's offer of light duties, modified work or his/her pre-incident job duties.

Embassy Corporation management personnel should ensure the injured worker that the rehabilitative job will not be a health or safety risk for the worker. The worker may be anxious about his or her condition and can be legitimately concerned that the return to work will cause his/her condition to get worse. We must respond to these concerns for the rapid re-employment program to be successful.

PROCEDURES TO FOLLOW:

STEP ONE – CALL THE WORKER!

First collect the information you need to prepare for the worker's return. Contact the worker or the worker's family as quickly as possible. Concentrate on establishing a good relationship with the worker and the worker's family by offering assistance and information. Unless it is impossible for the worker to return to work, contact the worker regularly. Try the following steps and write down the worker's responses. You should explain to the worker that this information is needed to plan for the worker's return.

1. Contact the worker within 48 hours of the accident.
2. After the accident has been investigated and the worker has received medical care, phone the worker.
 - a) Show that you care about the worker by offering assistance:
 - how you are feeling?
 - is there anything we can do for you?

- b) Make sure the worker understands the policy on sick and injured workers by explaining:
 - your commitment to keep the workplace safe and healthy
 - availability of a rehabilitative job if the worker cannot do the same job
 - your responsibility to help the worker return to work
 - your commitment to treat all workers with dignity, respect and compassion - explain the goals, procedures and benefits of the rehabilitative job.
- c) Ask what the doctor called the worker's medical problem or condition.
- d) Ask how long the doctor thinks the worker will be unable to work.
- e) Ask if the doctor said the worker could return to the pre-incident job or if the job should be changed in some way.
- f) If the worker cannot return to the pre-incident job, ask if the doctor will fill in a treatment rehabilitative work form so you can tailor a job to the worker's conditions. A functional abilities form should also be filled out to aid in determining our modified duties for the worker.
- g) Ask if the worker believes he or she can return to the pre-incident job.
 - Now? – skip to "(I)"
 - On _____ (Skip to "(I)")
 - Never – (Explain rehabilitative work)
- h) Ask when the worker believes he or she can return to a rehabilitative job?
 - Now? – (Skip to "(i)")
 - On _____ (Skip to "(I)")
 - Never – refer to example 5 in Step 2, if worker cannot return to work.
- i) Repeat your commitment to help the worker return to work. Let the worker know that everyone wishes the worker a speedy and lasting recovery.
- j) Ask for a convenient time to call back in the next two days, unless the worker can return to work within one or two days.

The main purposes of this contact are to open the lines of communication and to make sure that both the worker and the doctor are aware of the possibilities of rehabilitative work. Remember: active involvement and support from all parties are necessary to make the worker's return to work possible.

STEP TWO: HOW TO PROCEED

Review the Employer's Report of Accidental Injury and Industrial Disease, the Worker's Statement of Accidental Injury and Industrial Disease and the worker's responses from questions in Step One, before deciding how to proceed. Some examples of how to proceed are:

1. Worker can return to regular work immediately or within 1 or 2 working days.
2. The worker can return to regular work within 2 to 5 working days.
3. Worker can return to rehabilitative job immediately or within 20 working day.
4. The worker can return to regular work within 20 working days.
5. The worker can return to regular work within 20 or more working days.

You should be prepared to change your approach as more information becomes available or if the worker's condition changes.

Example 1:

The worker can return to regular work immediately or in 1 to 2 working days.

The Embassy Corporation supervisor should meet with the worker when he or she returns to work. Ask how he or she is feeling and go over the work duties. Note the worker's responses. Do whatever is necessary to help the worker do the job right away. Meet with the worker again during the second half of the shift. Ask again how the worker is feeling and whether the worker is having difficulty. Note the worker's responses.

Continue to follow up with the worker daily, then weekly, until full recovery.

Example 2:

The worker can return to regular work in 2 to 5 days.

If the worker is expected to return to the pre-incident job, phone the worker the day before the scheduled return. Ask the following questions and note the responses. Compare them to the worker's responses in Step 1.

1. Do you feel better?
2. Are you coming back to your regular duties tomorrow?
3. Do you need any assistance from me or from your co-workers?
4. When are you planning to see your doctor again? _____

Advise the worker of your desire to protect the worker's health and safety, and caution the worker to take care not to make the medical condition worse. One the day of the worker's return, meet with the worker at the start of his or her shift. Ask again how the worker is feeling and repeat your offer of assistance.

Comment: If the worker is having difficulty during the shift, go over the worker's difficulties in detail. You can suggest that the worker go home and return the next day.

Meet with the worker at the end of the shift. Repeat questions 1 or 4 and take note of the worker's responses. Again, suggest the worker be careful not to make the medical condition worse. Ask the worker to call you immediately if he or she cannot return to work the next day.

Comment: If the worker cannot return to work the next day, repeat Step 1.

Meet with the worker every day for the next week and review the above questions. Continue to follow the worker's condition until the worker has completely recovered.

Example 3

Worker can return to a rehabilitative job immediately or within 20 working day.

If the worker can return to a rehabilitative job, everyone should work toward creating a job that fits the worker's abilities. This means meeting with the worker to determine those abilities and then developing an appropriate job. In some situations, you or the worker might check with the worker's doctor that the position is appropriate before starting it. That way, you can offer more suitable, less risky work instead of delaying the worker's return.

MEETING WITH THE WORKER:

When you meet with the worker to discuss creating a rehabilitative job, the two of you should prepare a Physical Abilities Analysis. This is the worker's description of his or her capacity for work, for example, the ability to walk, stand or lift. You can compare this analysis to the Physical Demands Analysis for the rehabilitative job to see if it is suitable.

You and the worker should agree on:

- a) the type of rehabilitative work and the conditions of the workplace.
- b) how long the rehabilitative job will last (for example, three days, ten days)

Write out a description of the rehabilitative job and attach the Physical Demands Analysis. Note the date and time of your meeting and include the following statement:

"_____ and "_____ agree to the rehabilitative job assignment for the term noted." (Insert your name and the worker's.)

WHEN THE WORKER IS READY TO RETURN:

One the day before the return to work, phone the worker. Note the worker's responses to the following:

1. Are you feeling well enough to start your rehabilitative job?
2. Have you seen your doctor since we met?
3. Has your doctor said you can start the rehabilitative job?
4. Is there anything we should do before you return to work?
5. (For example, are there any temporary physical problems? Do you need a back support for your chair?)
6. Can you work your regular hours?
7. How can we arrange your hours to make this job possible (for example, chiropractor or physiotherapy appointments during work hours, etc.)?

Let the worker know that everyone is pleased he or she is returning.

Confirm with the worker's supervisor that the worker will return. The supervisor can arrange a time to greet the worker. If the supervisor is not available, he or she can write a short note welcoming the worker back.

DAILY JOURNAL

The worker's progress should be reviewed daily. The worker can keep a daily journal or can meet with you daily to report his feelings about returning to work. The journal should be kept until the worker returns to the pre-incident job.

You should also meet with the worker daily to review the journal and change the worker's tasks accordingly. The journal should include:

- the date and time the rehabilitative job began
- the type of work
- the worker's feelings about his or her performance
- the worker's feelings about his or her recovery
- the tasks the worker can do with and without difficulty
- the tasks that cause the worker more pain or discomfort

If the worker's medical condition worsens, consult the worker's doctor to make sure the rehabilitative job helps the worker to recover. Medical advice can also be obtained from the WSIB or from an independent doctor.

Example 4

The worker can return to regular work in 5 to 20 days

Often the doctor recommends the worker stay away from the pre-incident job for up to 20 working days. However, the worker might be able to start a rehabilitative job during his period. As with Example 3, you should meet with the

worker and complete a Physical Abilities Analysis. Write to the doctor to request advice on the rehabilitative job and offer to pay the doctor for this service. Send the letter to the doctor and the worker by the fastest means available. Include the following with the letter:

- the description of the pre-incident job
- Physical Demands Analysis of the pre-incident job
- the description of the rehabilitative job
- Physical Demands Analysis of the rehabilitative job

Send a copy to the following:

- the doctor
- the worker
- the worker's supervisor
- your director of human resources
- the WSIB

Ask the worker to contact the doctor to ensure the information is completed and returned as soon as possible. When you receive the information, you and the worker can discuss the rehabilitative job and set a date for returning to work.

Follow up with the worker twice a week.

IF THERE IS A DELAY

If for some reason the worker cannot start the rehabilitative job as planned, the two of you should agree on a new return date or a more appropriate rehabilitative job. In your weekly calls to the worker, ask the following questions:

- How are you feeling?
- Is your condition improving, the same or worse?

COMMENT: If the worker says the condition is the same or worse, ask for specific details (for example – stronger pain, trouble sleeping, medication not working).

- Do you think we can meet our target date of _____ ?
- Is there anything we can do to help you?

COMMENT: If the worker is waiting for an appointment with a specialist, offer to try another specialist for an earlier appointment which you will pay for.

- Are there any problems getting paid by us or by the WSIB?
- Can you get along well at home?
- How are your family and friends handling your situation?

Let the worker know you want to help him or her to get better and return to work. Tell the worker that he or she is missed and that you are looking forward to his or her return. Encourage the worker to let you know if he/she needs anything. Note the worker's responses so that you can identify how you, the employer, or outside sources can help the worker. Encourage co-workers to keep in touch with the worker.

Example 5

The worker cannot return to work for 20 or more working days.

As soon as possible, you and the worker should meet with the following people:

- the director or a representative of human resources
- the worker's supervisor
- a vocational rehabilitative specialist or worksite analyst from the WSIB
- worker's representative

Detailed minutes of the meeting should be kept and should be approved after the meeting. Each person should have a copy of the following:

- Physical Demands Analysis of pre-incident and proposed rehabilitative jobs
- the medical report released by the worker
- information on worker's physical restrictions
- the worker's responses to the questions asked Step 1

POINTS TO COVER

- Discuss the worker's physical restrictions or limitations. What could be changed to make it possible for the worker to return to the pre-incident job?
- If the worker cannot return to the pre-incident job, review the Physical Demands Analysis of four rehabilitative jobs. Which is the most suitable job? How long should the worker do the rehabilitative job? Ask the worker for examples of what job he or she thinks is reasonable.

You must write to the doctor for advice on the rehabilitative jobs and the worker's condition, and send a copy to the worker, your director of human resources, the worker's supervisor and the WSIB. Make sure the worker sees the doctor as soon as possible.

MANAGEMENT CONSIDERATIONS

- The worker must have the opportunity to voice his or her opinion and must agree with any decision made. Take careful notes if the worker objects in any way. Take your time and make sure you understand the cause of the worker's objections.

COMMENT: The worker might be finding it difficult to adjust to his or her medical condition.

- If the rehabilitative job is permanent or for an extended period of time, you must consider the appropriate level of wages. The goal is always that the worker returns to a position that pays the same as the pre-incident one. However, if the rehabilitative job pays less and you pay the lower rate, the worker is paid the difference by the WSIB. This means the goal of Rapid Re-employment Program is not fully achieved.
- Discuss what can be done to help the worker return to work. How could assistance be given? Contact the WSIB or your Vocational Rehabilitative caseworker for advice.
- If no rehabilitative job can be agreed on, consider Vocational Rehabilitation such as:
 - training for another job
 - courses to improve job skills (eg. - computer training, language training).
 - counseling (for example, psychological, financial, marital, vocational)
- Discuss who will pay for the Vocational Rehabilitation. The employer should offer to pay if the WSIB will not or if there is a delay. In any case, the cost of paying VR up front is often less than the cost of additional compensation.

IF VOCATIONAL REHABILITATION IS INVOLVED

- Arrange VR to start as soon as possible. Use the WSIB's services whenever possible.
- Meet with the worker weekly to discuss progress, concerns and problems. Go over the suggested return-to-work date and the rehabilitative job.

COMMENT: Let the worker know that everyone is looking forward to his or her return to work as soon as possible.

- At end of the VR plan, meet with the worker to discuss rehabilitative work.

IF THE WORKER CAN RETURN

When the worker is ready to start the rehabilitative job, follow the same procedures as described in Example 3.

IF THE WORKER CAN NEVER RETURN TO WORK

If a worker feels unable to return to work, verify that feeling.

- Does the doctor support the worker's opinion?
- Does the WSIB support the worker's opinion?
- Do you support the worker's opinion?
- Is there no possible rehabilitative job?

If the answer is yes to these questions, it is unlikely that the worker will return to work with the Embassy Corporation

Your new goal at this point, is to work with the WSIB and the worker in finding him a new job. This can be a temporary rehabilitative job while the worker recovers, until he or she can return to work with the Embassy Corporation project superintendent or a competent replacement

Consult the Vocational Rehabilitative caseworker and, if possible, a private consultant who specializes in job placement.

Regardless of the outcome, because of the effect that rapid re-employment has on the worker's FEL (future economic loss) reviews, you should keep in touch with the worker for six years from the date of the incident. You must do everything possible to see that the worker is employed. Perhaps the condition has changed or perhaps the worker is now able to return to work.

For the first two years, contact the worker at least monthly. Over the next four years, contact the worker twice a year.

Remember, a worker who is not working with you or another employer can receive WSIB benefits that are included in your Accident Cost Statement.

Always make sure that the WSIB is also doing everything possible to assist you worker. Keep in touch with the WSIB on a weekly or monthly basis.

STEP THREE: WHAT HAPPENS IF RAPID RE-EMPLOYMENT EFFORTS FAIL?

Occasionally the Rapid Re-Employment Program fails despite the commitment and cooperation of everyone involved. For example:

- The worker might:
 - feel uncomfortable with his or her temporary disability
 - refuse to participate in Vocational Rehabilitation
 - not fulfill the commitments of Vocational Rehabilitation
 - turn down work within his or her ability
 - have unrealistic employment expectations
 - not cooperate with you or the WSIB

The worker might be uncomfortable or embarrassed about returning to work in a reduced capacity. Offer support and reassurance to the worker that you are confident in the worker's abilities and that everyone is looking forward to his or her return. Suggest some form of counseling to help the worker cope with these changes in his or her life.

If the worker is uncooperative, let the WSIB know the details by telephone and in writing. The WSIB can change the worker's benefits accordingly.

COMMENT: If you cannot reach the WSIB adjudicator or the VR caseworker directly by phone within 48 hours, contact the WSIB claims manager for assistance.

- The doctor might not approve any rehabilitative work. Suggest the worker get a second opinion from a doctor at a WSIB community clinic or a doctor of your choice. If it is necessary, design another rehabilitative job.
- The VR plan might not give the worker the skills or training needed for a suitable job. Re-evaluate the rehabilitative job to see if it is still appropriate. Consider another job.
- The worker might be uncomfortable about returning to work because he or she is not receiving enough support from you or the other worker. Our health and safety policy stresses the importance of the return of the injured workers as well as the significant role of co-workers. Everyone should appreciate the benefits of returning the worker to work. Uncooperative co-workers should be dealt with in accordance with the disciplinary measures outlined in the our safety policy.
- Make sure you have followed the Rapid Re-Employment Program properly. Identify what could be done in the future to improve your program:
 - was all necessary information gathered or is there a system in place to obtain that information as it becomes available?
 - Have all the jobs that fit the medical specifications been offered appropriately to the injured worker? Were the offers followed up in writing?
 - was there regular contact with the worker without causing harassment?
 - does the worker have access to all information necessary to return to work?
 - has he or she received advice from the union, the WSIB or the Office of the Employer Advisor.
 - has the claims adjudicator been kept up to date?
 - has the claims adjudicator received copies of any written offers of employment?

12.2 **WORKER SUBSTANCE ABUSE PROGRAM:**

It is the policy of Embassy Corporation to assist any directly hired employee in dealing with substance abuse [drugs or alcohol]. We recognize the inherent dangers to other workers who are having to work with a worker who is impaired through substance abuse, as well as the personal problems associated with the substance abuser. All supervisors are to keep a watchful eye of any signs or symptoms associated with crew foremen and work site possible substance abuse by workers on our work sites. Workers suspected of being impaired shall not be allowed to continue working but rather shall be interviewed at the site office trailer and if necessary, escorted back home of his personal safety.

Our company management will follow these procedures:

- A) The project superintendent will discuss the situation with the shop steward or labour safety representative of the crew or the Joint Health and Safety Co-chair members. These people will talk and assess the problem. Where the third party concurs that the employee is unfit for work, the employee should be taken home.
- B) Where there is not an agreement after the third party assessment, assistance will be obtained from certified members of the Joint Health & Safety Committee.
- C) The employee will be made to understand that our management cannot allow him to continue working until he seeks medical attention and treatment to eliminate his dependence or practice of substance abuse. The worker will be suspended from working until his treatment is completed and his reliance to the substance is over.
- D) Management will assist in setting up a treatment plan in collaboration with the substance abuser's family doctor and such local substance abuse clinics as:
 - DeNovo Treatment Center 1-800-933-6686
 - Addiction Research Foundation 1-800-463-6273
 - Ontario Drug and Alcohol Registry of Treatment 1-800-565-8603

13.0 FIRST AID & MEDICAL TREATMENT REQUIREMENTS:

13.1 FIRST AID SUPPLY REQUIREMENTS:

Every Embassy Corporation project must possess the proper first aid kit and supplies. The required contents of the kit is defined by the FIRST AID REGULATIONS (1101) of the WORKERS SAFETY & INSURANCE BOARD, according to the size of the workforce at the particular project. Also defined is the size and contents of the room designated at the First Aid Station. Stretchers, cots, running water, sterilized instruments and the qualifications of the person in charge of such a facility, may be required, as dictated by WSIB FIRST AID REGULATIONS, in accordance to the *size of the workforce* on site and the proximity to the nearest medical facility. In all cases, the employer must post a form 82 - "IN ALL CASES OF INJURY", on every construction project and its first aid stations, in accordance to the WSIB First Aid Regulations 1101, which is available from the WORKERS SAFETY & INSURANCE BOARD. This form outlines the responsibilities and obligations of both the worker and employer, when an injury occurs at the work site.

13.2 FIRST AID TREATMENT RECORDS:

Whenever first aid is administered on the work site, a record must be made in the First Aid Record Book. The record must indicate the name of the worker, the nature of the injury, date/time of occurrence, date/time injury was reported, date/time of treatment, nature of treatment rendered and the name of the person rendering the treatment. Treatment forms of this type are available from the Ontario Construction Safety Association. This is a confidential document and must be treated as such. Once the record book has been filled, or the project completed, the record must be forwarded to Embassy Corporation office management of filing. By law it must remain filed of one year.

13.3 FIRST AID CERTIFICATION

It is a Embassy Corporation policy that each project superintendent or his competent replacement possess first aid training and certification. Where the project superintendent or his competent replacement does not possess this certification or where the certification has expired, the Project superintendent or his competent replacement shall be responsible to ensure that one or more qualified first aid attendants (workers) are employed at the work site. Unless otherwise instructed, *each subcontractor company* shall provide their own first aid equipment and trained first aid attendants (workers) as per the WSIB First Aid Regulations, which require all employers to provide first aid coverage.

13.4 MEDICAL TREATMENT:

In the event First Aid is insufficient to treat the injuries of an injured worker and the worker requires the services of a Physician, the Project superintendent or his competent replacement must assure that the injured worker signs the treatment memorandum form and that the attending Physician receives a copy of the signed form.

This treatment memorandum form permits the doctor to release information to the Embassy Corporation regarding the worker's condition, as well as giving a written account of the nature of the worker's injuries. The doctor also has the option to return the worker to modified duties of a specified period of time as our treatment memorandum relates to the doctor that those duties are generally available. It is the project superintendent or his competent replacement's responsibility to try to accommodate the injured worker's restrictions as prescribed by the attending Physician.

Please ensure the worker signs in the upper right hand corner of the treatment memorandum form, before he/she leaves the site to visit the doctor. A copy of the signed form should be transmitted to the Workers Compensation Board for their records.

It is in the best interest of the Embassy Corporation that the worker is accompanied to the medical facility by a project management member to inform the doctor of our modified duty options and to be briefed on the worker's condition.

This type and size of first aid kit shall be supplied at our headquarter operations offices and shops.

Inspector Name: _____

10 (1) Every employer employing more than fifteen and fewer than 200 workers in any one shift at a place of employment shall provide and maintain at the place of employment one stretcher, two blankets and a first aid station with a first aid box containing as a minimum,

- (a) a current edition of a standard St. John Ambulance First Aid Manual;
- (b) 24 safety pins;
- (c) 1 basin, preferably stainless steel; and
- (d) dressings consisting of,
 - (i) 48 adhesive dressings, individually wrapped,
 - (ii) 2 rolls of adhesive tape, 1 inch wide,
 - (iii) 12 rolls of 1-inch gauze bandage,
 - (iv) 48 sterile gauze pads, 3 inches square,
 - (v) 8 rolls of 2-inch gauze bandage,
 - (vi) 8 rolls of 4-inch gauze bandage,
 - (vii) 6 sterile surgical pads suitable for pressure dressings, individually wrapped,
 - (viii) 12 triangular bandages,
 - (ix) splints of assorted sizes, and
 - (x) 2 rolls of splint padding.

(2) The employer shall ensure that the first aid station is at all times in the charge of a worker who,

- (a) is the holder of a valid St. John Ambulance Standard First Aid Certificate or its equivalent; and
- (b) works in the immediate vicinity of the box.

[illegible]

This size and type of first aid kit shall be supplied to all our company vehicles and roofing projects where crews are between 5 and 15 workers.

Inspector Name: _____

9 (1) Every employer employing more than five workers and not more than fifteen workers in any one shift at a place of employment shall provide and maintain a first aid station with a first aid box containing as a minimum,

- (a) a current edition of a standard St. John Ambulance First Aid Manual;
- (b) 1 card of safety pins; and
- (c) dressings consisting of,
 - (i) 24 adhesive dressings individually wrapped,
 - (ii) 12 sterile gauze pads, 3 inches square,
 - (iii) 4 rolls of 2-inch gauze bandage,
 - (iv) 4 rolls of 4-inch gauze bandage,
 - (v) 4 sterile surgical pads suitable for pressure dressings, individually wrapped,
 - (vi) 6 triangular bandages,
 - (vii) 2 rolls of splint padding, and
 - (viii) 1 roll-up splint.

[illegible]

WSIB First Aid Regulation 1101 – Section 5 states:

Use this treatment log sheet below. Tape this record sheet to the back of the front cover of the first aid kit box so it is always available.



Anyone using these first aid supplies must fill out this record to comply with WCB Regulation 1101

[illegible]

13.5 HEAT STRESS POLICY:

The body's ability to dissipate heat (sweating process) is compromised when the humidity content in the air is high and the air is hot. It is our policy to make all workers aware of the risks of heat stress related conditions such as heat exhaustion and heat stroke. All project superintendents are to collaborate with other contractor supervisors and health and safety representatives in making workers aware of these risks.

Measures that can be taken to reduce the risks of heat stress are as follows:

- a) Workers are to refrain from drinking such beverages as teas, coffee and alcoholic drinks as they are diuretics and cause people to urinate which in turn further dehydrates the person.
- b) Workers should include some salty foods with their lunch but should not take salt tablets as it can result in stomach ulcer conditions.
- c) Engineered controls can help such as air conditioning when practicable and the use of fans to circulate the air.
- d) Supervisors must cause their workers to work short durations with plenty rest periods and to not over-exert themselves when working. The process of workers acclimatizing to hot environments is described below:

The longer you work hard in the heat, the better your body becomes at adjusting to the heat. If you are not used to working in the heat then you should take a week or two to get used to the heat. This is called "acclimatization". If you are ill or away from work for a week or so you can lose your acclimatization.

There are two ways to acclimatize:

1. If you are experienced on the job, limit your time in hot working conditions to 50 per cent of the shift on the first day, 60 per cent of the shift on the second day, and 80 per cent of the shift on the third day. Work a full shift on the fourth day.

If you are not experienced on the job (if you are, for example, a summer student), you should start off spending 20 per cent of the time in hot working conditions on the first day and increase your time by 20 per cent each subsequent day.

2. Instead of reducing the exposure times to the hot job, you can become acclimatized by reducing the physical demands of the job for a week or two.

If you have health problems or are not in good physical condition, you may need longer periods of acclimatization.

Other sources such as heat radiation from processes can also be problematic for workers and similar precautions should be taken.

Below is a Heat Index Chart that exemplifies the effects of moist heat to the human body. For example: If it is 86 degrees outside with the relative humidity at 60% it will feel like 92 degrees! In direct sunlight it will feel like 107 degrees !!

HEAT INDEX CHART

		RELATIVE HUMIDITY								
		10 %	20%	30%	40%	50%	60%	70%	80%	90%
TEMPERATURE F°	104°	98	104	110	120	>130	>130	>130	>130	>130
	102°	97	101	108	117	125	>130	>130	>130	>130
	100°	95	99	105	110	120	>130	>130	>130	>130
	98°	93	97	101	106	110	125	>130	>130	>130
	96°	91	95	98	104	108	120	128	>130	>130
	94°	89	93	95	100	105	111	122	128	>130
	92°	87	90	92	96	100	106	115	122	128
	90°	85	88	90	92	96	100	106	114	122
	88°	82	86	87	89	93	95	100	106	115
	86°	80	84	85	87	90	92	96	100	109
	84°	78	81	83	85	86	89	91	95	99
	82°	77	79	80	81	84	86	89	91	95
	80°	75	77	78	79	81	83	85	86	89
	78°	72	75	77	78	79	80	81	83	85
	76°	70	72	75	76	77	77	77	78	79
	74°	68	70	73	74	75	75	75	76	77

Directions: Locate the current temperature on the left column and then locate the relative humidity on the top row. Follow the temperature across and the humidity down until they meet; this measurement is the heat index. The heat index will increase 15 degrees in direct sunlight.

The following heat stress hazards are listed below and it is important for the first aid attendants and supervisors to become familiarized with the symptoms to look for and the initial treatments to apply until emergency medical personnel take over the situation.

	Cause	Symptoms	Treatment	Prevention
Heat Rash	Hot humid environment; plugged sweat glands.	Red bumpy rash with severe itching.	Change into dry clothes and avoid hot environments. Rinse skin with cool water.	Wash regularly to keep skin clean and dry.
Sunburn	Too much exposure to the sun.	Red, painful, or blistering and peeling skin.	If the skin blisters, seek medical aid. Use skin lotions (avoid topical anesthetics) and work in the shade.	Work in the shade; cover skin with clothing; apply skin lotions with a sun protection factor of at least 15. People with fair skin should be especially cautious.
Heat Cramps	Heavy sweating drains a person's body of salt, which cannot be replaced just by drinking water.	Painful cramps in arms, legs or stomach which occur suddenly at work or later at home. Heat cramps are serious because they can be a warning of other more dangerous heat-induced illnesses.	Move to a cool area; loosen clothing and drink cool salted water (1 tsp. salt per gallon of water) or commercial fluid replacement beverage. If the cramps are severe or don't go away, seek medical aid.	Reduce activity levels and/or heat exposure. Drink fluids regularly. Workers should check on each other to help spot the symptoms that often precede heat stroke.
Fainting	Fluid loss and inadequate water intake.	Sudden fainting after at least two hours of work; cool moist skin; weak pulse.	GET MEDICAL ATTENTION. Assess need for CPR. Move to a cool area; loosen clothing; make person lie down; and if the person is conscious, offer sips of cool water. Fainting may also be due to other illnesses.	Reduce activity levels and/or heat exposure. Drink fluids regularly. Workers should check on each other to help spot the symptoms that often precede heat stroke.
Heat Exhaustion	Fluid loss and inadequate salt and water intake causes a person's body's cooling system to start to break down.	Heavy sweating; cool moist skin; body temperature over 38°C; weak pulse; normal or low blood pressure; person is tired and weak, and has nausea and vomiting; is very thirsty; or is panting or breathing rapidly; vision may be blurred.	GET MEDICAL AID. This condition can lead to heat stroke, which can kill. Move the person to a cool shaded area; loosen or remove excess clothing; provide cool water to drink; fan and spray with cool water.	Reduce activity levels and/or heat exposure. Drink fluids regularly. Workers should check on each other to help spot the symptoms that often precede heat stroke.
Heat Stroke	If a person's body has used up all its water and salt reserves, it will stop sweating. This can cause body temperature to rise. Heat stroke may develop suddenly or may follow from heat exhaustion.	High body temperature (over 41°C) and any one of the following: the person is weak, confused, upset or acting strangely; has hot, dry, red skin; a fast pulse; headache or dizziness. In later stages, a person may pass out and have convulsions.	CALL AMBULANCE. This condition can kill a person quickly. Remove excess clothing; fan and spray the person with cool water; offer sips of cool water if the person is conscious.	Reduce activity levels and/or heat exposure. Drink fluids regularly. Workers should check on each other to help spot the symptoms that often precede heat stroke.

13.6 CARBON MONOXIDE POISONING:

Carbon monoxide is often called "the silent killer," because it gives no clear warning to its victims. **It is an invisible gas with no taste or smell** and it will not cause any unusual feeling in the nose, mouth or throat as it is breathed in. The first effects that can actually be noticed are headache and faintness. A worker who does not know about carbon monoxide poisoning may ignore these early symptoms or think a minor illness is coming on. But continuing exposure can cause confusion, loss of consciousness, and even death. Immediately Dangerous To Life: **1500 ppm**

All fuel-burning equipment emits some carbon monoxide. This includes car, truck and forklift engines, construction equipment powered by propane or gasoline, and non-electric heaters. Poorly maintained equipment usually emits more carbon monoxide: a poorly tuned gas engine may give off up to 12 times as much carbon monoxide as a well tuned one.

Carbon monoxide tends to build up in pockets in the poorly ventilated areas of workplaces. This can happen even in semi-enclosed workplaces, where tarpaulins and plastic sheeting are used for shelter. It is a Embassy Corporation policy that all efforts will be made to minimize the occurrence of carbon monoxide build-up. We require all contractors to ensure that the following preventative measures are taken on our projects:

1. All areas where fuel-burning equipment is being used must be ventilated by mechanical means to the outside.
2. Contractors are to tune and maintain engines and other equipment regularly.
3. Where practical, install air-monitoring devices. The alarms should be set **below** 35 ppm.
4. **Employers are to make their workers aware of the danger of carbon monoxide poisoning from fuel-burning equipment.** They should know the warning signs of carbon monoxide exposure — headache, faintness, dizziness, confusion, nausea, and irregular heartbeat — and should NEVER ignore them when working where fuel-burning equipment is being used. Workers who have been exposed to carbon monoxide need **immediate medical attention**.
5. The use of Carbon Monoxide Scrubbers (filters) to contractor equipment may be required to minimize the risk of Carbon Monoxide build-up.

We must remain within the following exposure limits:

Time-Weighted Average Exposure Value (TWAEV):

35 ppm (i.e. maximum allowable long-term exposure in parts per million)

Short-Term Exposure Value (STEV):

400 ppm maximum allowable short-term exposure)

14.0 SUB CONTRACTOR GUIDELINES TO OUR SAFETY PROGRAM:

14.1 Subcontractor Safety Policy

Embassy Corp. is committed to working cooperatively with all Subcontractors to ensure and maintain a healthy and safe work environment. Embassy Corp. believes that working openly and collaboratively to ensure the safety and health of all workers and visitors is critical to building strong and sustainable relationships and will result in a rewarding and successful project outcome.

Embassy Corp.'s Safety Program and policies have been developed to ensure that Safe Production and a safe and healthy work environment is appropriately planned, achieved and sustained with the participation of subcontractors. Accordingly, it is the responsibility of all subcontractors employed or otherwise engaged on Embassy Corp.'s project to work cooperatively and comply fully with Embassy Corp.'s policies and requirements - including those that exceed applicable provincial legislation and regulation - as well as any site specific client policies, as identified.

All subcontractors are required to complete the **Company Safety Checklist** (pg.53) prior to work commencement and to ensure that it has been reviewed with the job Supervisor/ Foreman assigned to the site.

In the event of non-compliance with any of the above, the following actions may be taken:

- Subcontractors and all related work may be suspended;
- Workers, Supervisors, and Contractors may be removed from the site;
- Contractors may be subject to monetary back charges associated with the delays and completion of the work; and
- Contractors may be responsible for any fines or charges levied against Embassy Corp. due to the legislative noncompliance.

The subcontractors will ensure appropriate supervision of their own workers and crews (including subs of subs) in accordance with these program requirements and will contribute to ensuring a commitment to Safe Production activity always on our sites.

Signature, PETER LEONE

Date: Jan 1/2023

PRESIDENT/CEO

Subcontractor Acknowledgement

I acknowledge and agree with the above Safety Policy.

I will personally endeavor to ensure that the employees of my company are aware of and comply with the above.

Signed by the Subcontractor Owner/President:

Signature

Company

Print Name

Date

14.2

Subcontractor Pre-Qualification Standards

Clearly setting-out Embassy Corp.'s program expectations and requirements with subcontractors prior to job start-up and engaging them in site-safety hazard assessment and planning where appropriate is essential to ensuring their understanding and buy-in.

Subcontractor pre-start-up requirements include:

1. Responsibility to conduct an on-site pre-job hazard assessment, a copy of which is to be provided to the site superintendent (or designate) before any work can begin.
2. Providing a signed copy of all safe work practices and procedures for the project to Embassy Corp.'s Superintendent (or designate) and providing proof that all of the subcontractor's on-site employees have reviewed the documents before starting work on-site.

Note: It is imperative to site safety planning and coordination that the Subcontractor President/Owner signing the Checklist review and discuss the completed document with their site Supervisor/Foreman prior to their arrival on-site. This expectation must be emphasized to the subcontractor by Embassy Corp.'s representative upon signing and again by the Project Manager prior to the subcontractor mobilizing on-site.

Subcontractor workers/crews must arrive on-site with all appropriate documentation demonstrating proof of training and certification, required PPE, and full understanding that they will be required to follow the requirements of Embassy Corp.'s Safety Program.

Orientation and Training

All subcontractor workers arriving on Embassy Corp.'s site must receive a full Company Orientation prior to commencing work activities.

Any worker that has not worked on Embassy Corp.'s site for more than twelve months must receive the full orientation - prior to commencing work activity.

Up-to-date training records and/or certifications for any subcontractor employee anticipated to be onsite should be provided to the Site Superintendent (or designate) prior to mobilization or, alternatively, during site orientation and prior to the commencement of any work activity.

Any additional or alternate workers subsequently assigned to the site must also provide their training records and/or certifications upon arrival on-site for orientation and prior to commencing any work activity.

Hazard Assessment

Subcontractors are required to fully comply with requirements set-out in Embassy Corp.'s Hazard Assessment Policy including participation in pre-start-up and ongoing Job Hazard Assessments (JHAs) where appropriate and feasible. To be reviewed and signed-off by the subcontractor Foreman/Supervisor prior to the commencement of daily work activity.

Incident Reporting

Subcontractors are required to report all incidents and near misses to Embassy Corp.'s Superintendent and/or Safety Coordinator. Embassy Corp. may participate in the investigation process. Subcontractors shall investigate as a minimum:

- Lost Time Incidents
- Medical Aid Incidents
- First Aid Incidents
- Property Damage Incidents
- Environmental Incidents
- Events that have potential for serious injury, property damage or environmental impact

All preliminary incident reports must be forwarded to Embassy Corp. within 24 hours

Post-Job Evaluation

Building strong and sustainable relationships with our subcontractors is an important aspect of our overall company success. To effectively develop those relationships, it is important that we review and assess both the strengths and challenges of working with individual subcontractors on each job, as well as opportunities for improvement. These observations should be captured and recorded on the project file as well as in the comments section on the Subcontractor Registration Database.

Wherever reasonable and practical, opportunities for improvement should be openly and frankly discussed with subcontractors, as well as Embassy Corp.'s commitment to Safe Production and our expectations for their participation in, and contribution to, overall project and program success.

SUB CONTRACTOR'S PROVISION OF DOCUMENTATION:

The Sub contractor shall provide Embassy Corporation any or all of the following:

- Copy of their health and safety policy and procedures
- Any engineered stamp and signed design drawings and specifications for equipment, structures, shoring, etc.
- Written safe work procedures as required [eg. FALL PROTECTION COMPLIANCE PLAN]
- Traffic control protection plans for both or either inside or outside of project.
- Any records of training required by the safety regulations or our policy such as for:
 - Fall Protection
 - W.H.M.I.S.
 - Propane Handling Certification
 - Traffic Control
 - Hoisting, Rigging and Signaling
 - Confined Space Work
- Any licenses or permits, log books and operator manuals of equipment.
- All documents required by Ontario's O.H.&S. Act and its Regulations.
- Copies of Hazardous Material Safety Data Sheets and records of W.H.M.I.S. training for all contractor workers on our projects.

- Signed copy of our Declaration of Supervisor Competency form.

The sub contractor shall maintain copies of all documentation required to be kept on the work site, in accordance to applicable legislation, prior to the commencement of work and the arrival of material/equipment arriving on site. This includes but is not limited to the above.

NOTIFICATION OF NEAR MISSES, INCIDENTS OR ACCIDENTS:

- Sub contractors, their employer, supervisors or workers are required to report all incidents, accidents or near misses to Embassy Corporation project superintendent.
- Submit copies of documentation required by provisions of Ontario's Occupational Safety Act or the Workers Compensation Act, of reporting accidents, incidents and injuries to the authorities shall be submitted to the governing authorities and Embassy Corporation for review. In cases of accidents resulting in Critical Injuries, the sub contractor shall ensure the accident scene is not disturbed except of the purposes of:
 - Saving life or relieving human suffering;
 - maintaining an essential public utility service or public transportation system, or; preventing unnecessary damage to equipment or other property

INVESTIGATING AND REPORTING PROCEDURES:

All sub contractors must conduct a full investigation of any accident or incident causing personal injury or property loss. Near miss incidents should also be fully investigated. The investigation should identify the events leading to the accident, incident or near miss, along with the root causes, witness statements, related information and measures to be taken to prevent a recurrence.

Sub contractors are to ensure the proper authorities are notified and the appropriate reporting forms are submitted within the prescribed time restraints as set out in legislation. Embassy Corporation requires to be notified within twenty-four hours of any claim made by anyone against the Constructor or a trade contractor of any accident, incident or material or property damage.

14.3 ENSURING COMPLIANCE ON OUR WORK SITES:

Sub contractors will be held accountable to their obligations to ensure compliance to all provisions of Ontario's Health and Safety Act and its Regulations of Construction Projects, and to our own Corporate Health and Safety Policy requirements and rulings.

Sub contractors are required to enforce the above in addition to ensuring safe work

practices and work site conditions prevail on our projects. In accordance to the Embassy Corporation- SUBCONTRACTOR HEALTH AND SAFETY AGREEMENT penalties may be assessed against the sub contractor of non-compliance behavior of their employers, employees and suppliers.

Any remedial action having to be taken by Embassy Corporation for any reason, to correct trade contractor work site conditions or neglect, and other reasons as per our agreement, such costs incurred by Embassy Corporation shall be back charged to the trade contractor.

NOTICE TO CONTRACTORS:

It is imperative the all contractor management having workers on our projects, ensure their workers are competent in the performance of their tasks as defined under Ontario's Occupational Health and Safety Act and Regulations for Construction Projects - 213/91. Checks will be made to ensure proper training is in place at your work operations. The lack of training records and/or the evidence of poor and unsafe work performance may prompt representatives of Embassy Corporation to require training or re-training as the circumstances dictate.

SUB CONTRACTOR PERFORMANCE REVIEW:

An evaluation of any trade contractor on our projects may be conducted to determine at intermittent stages of their contract and an overall rating assessed. Such assessments will be forwarded to Embassy Corporation management of record and review. Trade contractors exhibiting poor ratings may not become eligible of future contract bid considerations.

SUMMATION:

The corporate health and safety rulings below are meant as a guide to establishing safe work practices and conditions. They are not all inclusive. Trade contractors are advised to refer to the provisions of the Ontario statutes (legislation) and industry standards of further guidance.

15.0 CORPORATE HEALTH AND SAFETY RULES

It is the policy of the Embassy Corporation to insist that all sub contractors, their employers and employees, and our direct workforce, understand and strictly adhere to the provisions of the Occupational Health and Safety Act of Construction Projects and its regulations.

The duties and responsibilities of the supervisor, worker and employer, legislated in the Occupational Health and Safety Act, are of particular importance. Below, are some of the most fundamental of our Corporate Safety Rules. Know them and adhere to them. Your supervisor or project superintendent or competent replacement, will inform you of any additional safety rules and procedures, governed by the corporate policies of the owner of our projects.

PERSONAL SAFETY RULES

1. HEAD PROTECTION:

C.S.A. approved class "B" hardhats must be worn at all times while you are on the project. [Long hair must be gathered and controlled so there is no risk of it catching in machinery or obstructing a worker's field of vision.]

FOOT PROTECTION:

"Green Patch" - C.S.A. approved footwear with toe and sole protection must be worn at all times while you are on the project.

2. SKIN PROTECTION:

Appropriate work clothing must be worn when handling and using tools and materials which may cause injuries to your skin.

3. Face shields, goggles or glasses must be worn by workers and must be of a design to afford suitable EYE AND FACE PROTECTION when:

- a) Welding, burning or cutting with torches;
- b) Using abrasive wheels, portable grinders or files;
- c) Chipping concrete, stone or metal;
- d) Working with materials;
- e) Drilling or working under dusty conditions;
- f) Sand or water blasting;
- g) Waterproofing;
- h) Working on energized switchboards;
- i) Using explosive actuated fastenings or nailing tools;
- j) Working with compressed air or other gases;
- k) When working near any of the operations listed above.

4. For your protection on the job, do not wear :

- LOOSE CLOTHING OR CUFFS
- GREASY OR OILY CLOTHING, GLOVES OR BOOTS
- TORN OR RAGGED CLOTHING
- FINGER RINGS, BRACELETS OR NECK CHAINS

5. Other personal protective equipment, such as safety belts and full-body harnesses, respirators, reflective vests, floatation vests, ear protection devices, etc., must be worn when required by the Occupational Health and Safety Act or its regulations and your supervisor.

6. NON-PRESCRIPTION DRUGS OR ALCOHOL:

Non-prescription drugs or alcohol will not be allowed on the job and any employee found to be in possession of, or under the influence of, drugs or alcohol, will be refused from working and is liable to be severely disciplined or terminated from employment.

7. REPORTING INJURIES AND ACCIDENTS/INCIDENTS:

All injuries and accidents/incidents, no matter how minor, must be reported immediately to your supervisor. The supervisor will conduct his investigation and report to management.

8. REPORTING UNSAFE PRACTICES AND CONDITIONS:

If you should notice any unsafe practice or condition on the job, you are obligated by law and by this company to report the situation immediately to your supervisor, so corrective action can be taken.

9. NO JUMPING:

No person shall jump from one level to another and anyone discovered jumping will be reprimanded and subject to immediate termination from employment. Use proper means of egress and access.

10. Never place tools or materials near edges to openings or levels, as these items may fall onto someone below. Keep all tools and materials at least six feet back from edges and openings.

11. SEEK ASSISTANCE WHEN LIFTING HEAVY ITEMS:

Always seek assistance or use mechanical lifting devices when attempting to lift heavy material. Avoid awkward positions and always lift with the legs, not your back. Your back is very susceptible to injury in a bent position.

12. NO HORSEPLAY:

Do not engage in any prank, contest, feat of strength, unnecessary running or boisterous conduct.

13. DO NOT REMOVE GUARDRAILS OR COVERINGS:

Do not remove or make ineffective, any protective device, equipment or thing, required by your employer or the Occupational Health and Safety Act and its regulations. If your work requires the removal of such a protective device as a guardrail or covering, use the appropriate safety measures to protect yourself and other workers and when your work is finished or you leave the area, replace the protective device immediately. Report any the presence of any missing or defective, protection device, immediately to your supervisor.

14. OBEY OUR NO SMOKING RULES:

Smoking is strictly prohibited near flammable or combustible gases and materials, and all storage areas. Obey all signage in areas forbidding smoking.

15. KNOW YOUR LIMITATIONS:

Never work at heights if you are afraid to do so, or if you are ill or subject to dizzy spells. Tell your supervisor. He will respect you of being honest and assign you to other suitable work. Always work within your limitations.

16. MINIMUM DRESS CODE:

Every employee shall wear a minimum of a full T-shirt and long pants to prevent injury from the elements and harmful substances. No shorts or tank tops allowed.

17. WORK IN WELL LIGHTED CONDITIONS:

Always work in adequately lighted conditions. Use portable lighting stations in un-serviced areas. No one should ever be allowed to work in the dark.

18. AVOID WORKING ALONE:

Always use the "buddy system" to avoid working alone. If it is necessary to do so, arrangements should be made to check on the worker at fifteen-minute intervals, by the worker's supervisor. Confined space work however, requires constant tending of the isolated worker(s) and there are strictly regulated procedures to follow in this kind of situation. Check with your supervisor for instructions before entering any confined space.

19. ACCESS/EGRESS TO WORK AREAS :

Access and Egress shall be by way of ramp, ladder, stairs or runway. Workers should not Climb or jump to access levels.

20. LADDERS

- a) Ladders should be set up on a firm level surface and if the base is to rest on soft un-compacted or rough soil, a mud sill should be used.
- b) Straight ladders should be secured top and bottom to prevent movement.

- c) When working off an extension ladder, the length of the ladder should be such that the worker stands on a rung no higher than the second rung from the top.
- d) When climbing up or down, workers should always face the ladder.
- e) Ladders should not be erected on boxes, carts, tables, scaffold or man lift platforms or on vehicles.
- f) Depending on the length, straight ladders should be set up at an angle such that the horizontal distance between the top support and the base is not less than one quarter or greater than one third the vertical distance between these points.
- g) Metal ladders or ladders with wire reinforcing, must not be used near energized electrical conductors.
- h) All ladders erected between levels must be securely fastened, top and bottom to prevent movement, extend 900 millimetres (3 feet) above the top landing and afford clear access at top and bottom.
- i) Ladders with weakened, broken, bent or missing steps, broken or bent side rails, broken, damaged or missing bases or otherwise defective must not be used and should be tagged and removed from site.
- j) Ladders should not be used horizontally as substitutes of scaffold planks, runways or any other service of which they have not been designed.
- k) Workers should not straddle between the ladder and another object.
- k) Three points of contact should always be maintained when climbing up or down a ladder (two feet and one hand or one foot and two hands).
- l) If work to be performed on a ladder will cause heavy exertion by the worker or the worker to overextend to the sides, it is best to utilize a scaffold platform.
- m) Under no circumstances should a worker attempt to hand carry materials or equipment, while climbing or descending on a ladder. It is important to maintain three point contact at all times. Use a rope or hoist to lower or raise items from one level to another.
- o) According to regulatory requirements, there must be a minimum clearance of six inches between ladder rungs and any surface. This will ensure the worker obtains a firm footing.

21. USE OF GRINDERS AND CUTOFF SAWS:

Abrasive wheels can cause serious injury. Proper storage, use and maintenance of these wheels must be observed. Follow these guidelines:

- a) Familiarize yourself with the manufacturer's operation manual before using the tool. Follow all safety instructions.

- b) Ensure proper guards are in place and that all necessary personal protective equipment is used of your personal safety.
- c) Never exceed the maximum wheel speed (every wheel is marked). Check the marked speed and compare it with the speed of the grinder.
- d) When mounting the wheels, check them of cracks and defects, ensure that the mounting flanges are clean and the mounting blotters are used. Do not over tighten the mounting nut.
- e) Before grinding, run newly mounted wheels at operating speed to check of vibrations. A vibrating or defective wheel could explode causing injury.

22. WELDING, TORCH CUTTING OR BURNING:

Work involving welding, torch cutting or burning can increase the fire and breathing hazards on any job. Follow these guidelines prior to the start of work.

- a) Always ensure that there is adequate ventilation, natural or mechanical since hazardous fumes can be created causing respiratory harm.
- b) Always use the necessary personal protective equipment of your protection such as respirators, cutting goggles and protective clothing.
- c) Ensure there are fire extinguishing equipment nearby of immediate use.
- d) Check cables and hoses to protect them from slag and sparks.
- e) Check the work area of combustible material and possible flammable vapors before starting work. If combustible materials or sensitive equipment cannot be removed, fire blanket protection or a fire watch must be maintained.
- f) Never weld or cut lines, drums, tanks, etc. that have been in service without first making sure that all flushing, ventilating, purging precautions have been carried out and permits obtained.
- g) Never enter, weld or cut in a confined space without first conducting proper air tests and all other necessary confined space procedures and required lockout and tagging.
- h) When working overhead, cordon off your work zone below and post signs warning other workers to stay clear. Use fire resistant materials (fire blankets, tarps, etc.) to control or contain slag or sparks.
- l) Contact lenses should never be worn by anyone working near welding operations.

23. USE OF CHAIN SAWS :

Workers must refer to the manufacturer's operation manual and now be trained in its safe use before using a chain saw. Follow these guidelines:

- a) Never leave a running chainsaw unattended. Shut it down.
- b) Use all protective equipment such as chin guards, hearing, eye and head protection. Fuel the saw in a ventilated area and not while it is running.
- c) Ensure that the chain saw brake is functioning properly - stops the chain.
- d) To prevent chain kickback, the chain must be kept sharp, have the correct tension and be adequately lubricated.
- e) The correct methods of starting, holding, carrying, using and storing of the saw as directed by the manufacturer must be adhered to.
- f) Ensure that the saw motor is shut off while transporting.
- g) Ensure that your clothing is tight fitting.

24. WOOD WORK PLATFORMS :

Work platforms shall be a minimum 18 inches wide and be designed and constructed to support and resist at least four times the anticipated load. Workers are to refrain from using spools, ladders as a support for planking, poorly constructed benches and inadequate materials as a work platform. All platforms must be suitably cross braced to provide stability.

25. SCAFFOLD ERECTION AND USE:

Refer to the scaffolding guidelines in this booklet.

26. USE OF COMPRESSED AIR EQUIPMENT :

Air powered tools in construction range from stapling guns to jack hammers. If not treated with respect, these tools can cause serious harm.

- a) Prior to use all hoses should be physically inspected of defects such as cuts, abrasion, bulging and other damage. Any defective hoses should be taken out of service of repair or replacement. Ensure their connections are securely wired.
- b) Wear personal protective equipment such as eye protection and face shields, and ensure other workers in the area are made aware of or have restricted access to the hazard area.
- c) A proper pressure regulator and relief device must be in the system to ensure that correct desired pressures are maintained.
- d) The equipment must be properly inspected and maintained in accordance to the manufacturer's requirements.

27. USE OF HAND HELD ELECTRICAL POWER SAWS :

In addition to following the manufacturer's safe operational instructions, the following guidelines should be considered:

- a) Always unplug the saw from its power source before attempting to change its blade. Always keep the blade sharp.
- b) Before the saw is set down always ensure the retracting blade guard has fully returned to its down position.
- c) Ensure all cords are clear of the cutting area before starting to cut.
- d) Before cutting check the stock of foreign objects or any other obstruction which could cause the saw to "kick back".
- e) When ripping, make sure the stock is held securely in place.
- f) Where harmful vapours or dusts are created, approved breathing protection is to be used.
- g) As with all electrical tools used outdoors or in wet locations, ground fault circuit breaker interrupter devices must be used either at the power panel or at the cord.
- h) Avoid using gloves or other loose fitting clothing - could catch in blade.

28. DEFECTIVE TOOLS - What to look out for:

If a tool is defective in some way, - DO NOT USE IT! Inspect all tools prior to use and ensure defective tools are repaired. Watch of problems like:

- a) broken or inoperative guards
- b) insufficient or improper grounding due to damage of double insulated tools - e.g. cracked casings.
- c) no ground wire (broken ground post) on plug or frayed cords.
- d) on/off switch is not in good working order - e.g. jams, releases.
- e) improper grinding wheel speeds or chipped/cracked blades.

29. POWDER ACTUATED TOOLS:

- a) Only workers who have furnished evidence of training by the manufacturer shall be allowed to operate a powder-actuated tool.
- b) Eye and head protection shall be worn by all personnel exposed to the use of this type of tool.
- c) Tools shall not be loaded until just prior to use and loaded tools shall not be left unattended unless they are locked in a container.

- a) These type of tools are not to be used in or near an explosive or flammable atmosphere and cartridges (power source) shall be kept separated from all other material.
- b) Hearing protection shall be worn by the operator and any workers within the confines of an enclosed area up to 50 feet from the point of discharge and 25 feet in open outdoor locations.
- c) These tools should never be pointed at anyone, whether loaded or unloaded. Hands should be kept clear of the muzzle at all times.
- g) Keep cartridges stored in a suitable container. Un-discharged (misfired) cartridges should be kept in a water filled container until they can be safely disposed of.

30. TRENCHES AND EXCAVATIONS:

- a) Work shall not be performed in a trench unless another worker is working above ground and in close proximity to the trench or to the means of access to it. Where personnel are required to enter a trench, proper means of access and egress must be provided *within the protected area*.
- b) Where personnel are required to enter a trench deeper than 1.2 metres (4 feet), the walls must be cut back on a one to one or a one to three gradient depending on the classification of the soil, or be supported as prescribed in Ontario's regulations 213/91 under Excavations - Part III.
- c) Where the depth of the trench exceeds 6 metres (20 feet) or the width exceeds 3 metres (10 feet), the support must be designed by a professional engineer.
- d) Where it is not practicable or possible to cut back or shore an excavation wall, a professional soil test engineer shall determine the stability of the excavated wall and state in writing whether it is safe to work near the wall(s), along with the frequency of follow-up inspections and other precautions to be taken.
- e) No excavating shall commence until a determination has been made as to the possible location of any services in the area. The location of any service lines shall be marked and if said services cannot be disconnected or shut off, the utilities authority shall supervise its uncovering if the service will endanger any workers in the area.
- f) Materials, equipment and excavated surcharge shall be kept back at least two meters away from the edge of any excavation and a level area of at least one meter from the excavated edge shall be maintained at all times.

31. WALL BRACING

Masonry walls require temporary bracing until installation of the permanent structural members. Masonry walls should not be built higher than ten times their thickness unless properly braced.

32. FIRE PROTECTION

Fire extinguishers must be readily accessible at adequately marked locations, properly maintained and promptly refilled after use. Also they must be inspected for defects or deterioration at least once a month by a competent worker who shall record the date of the inspection on a tag attached to it. At least one fire extinguisher must be provided where flammable liquids are stored, handled or used, where temporary oil-fired or gas fired equipment is used, where welding or open-flame or gas fired operations exist and on each storey of an enclosed building being constructed or altered and of each workshop with 300 or fewer square metres of floor area. Every fire extinguisher must be of a type whose contents are discharged under pressure and shall have an Underwriter's Laboratories of Canada 4A40BC rating.

33. TRAFFIC CONTROL

A worker who is required to direct traffic shall be a competent worker of such purposes and shall not perform other work while directing traffic. The worker shall be given written instructions in a language he can read and understand, setting out the signals he is to use; and shall have the instructions explained to him orally. The traffic control person shall wear a vest that is reflective fluorescent and colored blaze orange or red.

34. TRUCKS AND HEAVY EQUIPMENT BACKING UP

All vehicles shall be equipped with back-up beepers and in situations where workers are nearby and possibly in danger, a traffic control person will position himself or herself in view of the vehicle operator and his intended path and direct the operator. The traffic control person and workers in the area should be made aware of the vehicle's blind spots, by the operator.

35. COMPRESSED GAS CYLINDERS:

Use compressed gas cylinders with extreme caution. Some basic safety rules are:

- a) only competent and authorized workers are to handle compressed gas cylinders.
- b) all compressed gas cylinders should be stored in a secured and upright position.
- c) after using a compressed gas cylinder, always ensure that the valve has been closed and that the protective valve cap is in place.
- d) upon discovery of a compressed gas leak from a cylinder, hose, valve or other connection, discontinue use until the problem has been rectified. Under no circumstances is a leaking compressed gas cylinder to be used.

- e) No empty cylinders shall be left inside enclosed buildings. Take them to an outdoor compound.
- f) When storing compressed gas cylinders, always store empty ones separately from full or partially filled cylinders.
- g) Compressed gas cylinders should be stored in a designated outdoor compound, affording adequate ventilation and explosion proof characteristics.
- h) Always keep compressed gas cylinders at least 15 feet away from any heat generating sources.
- i) Overhead protection should be provided to the valves and connections to compressed gas cylinders when there is a risk of materials falling from above.

36. WIND RELATED HAZARDS :

Strong winds and gusts pose a real risk to workers. In these conditions, refrain from handling materials at heights of risk of being blown over. Walls and structures of any type are vulnerable to collapse and special bracing precautions should be taken.

37. ELECTRICAL EQUIPMENT:

- a) Prior to performing any maintenance or repairs on live electrical equipment, all power sources must be locked out and disconnected. Subcontractor supervisors must have proper lock-out procedures of their workers to follow.
- b) Electrical panels and fuse boxes should not be covered or hidden by articles or clothing, materials or machinery. Keep the area in front of these services clear of obstruction and water.
- c) All electrical equipment must be effectively grounded and have Ground Fault Circuit Breaker Interrupter devices when used outdoors or in wet locations.

38. FLAMMABLE AND COMBUSTIBLE MATERIALS:

- a) All flammable materials must be stored in approved containers, in well ventilated areas, with caps in place, away from heat, open-flame and ignition sources.
- b) Quantities of flammable materials greater than 235 litres must be stored outside in an isolated and fenced area, away from exits and entrances and with "no smoking" signs posted.
- c) All flammable or combustible materials must be clearly labeled as to their inherent dangers, re: W.H.M.I.S. labeling requirements.
- d) Supervisors are to ensure their workers are aware of the volatile characteristics of the flammable and combustible materials they store, use, handle or transport.
- e) Be aware of vapour build-up in confined spaces and low lying areas such as pits and trenches.

39. FORKLIFTS

- a) Daily inspection checks shall be performed by the operator in accordance to the manufacturer's recommendations. Only trained personnel shall operate forklifts.
- b) Do not drive with wet or greasy hands. You could lose steering control.
- c) Face in the direction of travel, look behind you before going backwards.
- d) Make sure that the truck is able to carry the load.
- e) Recheck the brakes with the first load, and when changing to heavier loads. Never drive with faulty brakes. Report faulty brakes right away.
- f) Avoid sudden stops, starts or turns. These could spill the load.
- g) When vision is blocked, stop and sound horn at doors, corners, exits, etc.
- h) Cross railroad tracks very slowly, on an angle if possible.
- i) Keep forks close to the ground (4"-6") and tilted slightly back.
- j) Do not drive into an area where there may be flammable or explosive dust or vapours unless the truck is designed and approved of such hazardous areas.
- k) Slow down or stop when your vision is blocked.
- l) No horse-play or stunt driving, and no passengers.
- m) Do not lift anyone on the forklift blades, this is strictly prohibited.
- n) Do not work or allow others to work under raised loads.
- o) Before entering elevators, check if they are empty and locked at floor level. Make sure they can carry the load. Turn off engine when in elevator, and lower the forks.
- p) When driving up or down a slope, the load must always be uphill. Do not drive across a slope.
- q) When you leave the truck, lower the forks, set the brake, neutralize controls, and shut power.
- r) When parking the truck, do not park on a slope and do not block gangways, halls or exits.

40. PORTABLE PROPANE HEATING SYSTEM SETUP AND USE :

Ontario's Energy Act now requires employers to provide written evidence certifying the competency of persons assigned to connect, activate, handle and disconnect portable propane heating systems with inputs of 400,000 btuh or less. Certification cards expire three years from the issue date and the holder must then retrain. In addition to compressed gas cylinder handling guidelines we expect the following to be adhered to:

- a) handlers of propane cylinders and heaters are to wear insulated gloves and eye glasses of their protection.
- b) only certified persons are to handle, connect, disconnect or activate these propane systems.
- c) cylinders are to be secured in an upright position and the gas lines are to be protected against damage at all times.
- d) a minimum ten foot clearance is required between heater and combustibles and between cylinders and ignition sources.
- e) adequate ventilation is required to prevent flame out of heaters.
- f) always test of leaks using soap and water. Never use matches .
- g) fire extinguisher protection must be made readily available.
- h) review the manufacturer's operation manual of specific safe work procedures.

41. INCIDENTS INVOLVING TENANTS AND GENERAL PUBLIC:

Contact by construction personnel with the general public and/or occupants of existing buildings must be limited and not be confrontational. All trade contractors must advise their employees of this requirement and to report any adverse contact with the general public or occupants to their supervisor and in turn to the Embassy Corporation project superintendent or his competent replacement.

All incidents, accidents, or near miss occurrences must be reported immediately to the site supervisor. Failure to report will result in disciplinary action by the Embassy Corporation. Trade contractors must make Embassy Corporation aware of any change in their work operations, which may cause unforeseen hazards or concerns by occupants or the public. Where required "Information Notices" will be supplied to Occupants regarding hazards.

42. SIGNALMAN:

Around heavy trucks and equipment, a competent signalman is required when the operator's view is obstructed or when the equipment is driven where the operator or another person may be endangered, as in backing up. A high visibility vest shall be worn when necessary. The signaler shall not perform other work while acting as a signaler.

43. CRANES AND OTHER HOISTING EQUIPMENT:

- a) All hoisting equipment shall only be operated licensed and /or qualified personnel.
- b) The operator must never leave the controls unattended while the equipment is running.
- c) If the view of the operator is obstructed, he shall request the assistance of a competent signalman.

- d) Hydraulic equipment must never be left unattended while any part is in a raised position.
- e) Loads being hoisted are not to pass over workers or handled in such a manner which might endanger a worker.
- f) All log books and maintenance records are to be present with the hoisting equipment and kept up to date. A thorough pre-job maintenance of the hoisting equipment shall be performed and recorded in the appropriate log books. An inspection / approval report is to be provided to the site supervisor and signed by the licensed mechanic, before the machine is brought on site.
- g) No hoist operator shall swing any loads over existing public buildings without prior approval from the building's owners.
- h) The operator perform daily inspections of his hoist equipment prior to use and record such inspection results in his daily inspection log.
- i) No crane or other hoisting equipment shall be loaded beyond its rated capacity.
- j) The operator shall ensure the hoist boom or device is kept a safe distance from all high power sources as per regulations.

44. RIGGING REQUIREMENTS:

- a) All rigging equipment shall be inspected prior to each shift and as necessary during the shift to ensure safety. Damaged or defective slings shall be immediately removed from service.
- b) Wire rope slings shall be lubricated as necessary during use to prevent corrosion.
- c) Only competent workers trained in rigging and signaling shall be allowed to rig and handle loads.
- d) All rigging equipment shall have at least a safety factor of five.
- e) All rigging devices including slings shall have permanently affixed identification stating size, grade, rated capacity and the name of manufacturer.
- f) Wire rope slings shall be padded or softeners used to protect it from damage from sharp corners.
- g) Loads handled by slings shall be landed on cribbing or dunnage so that slings need not be pulled from under or be crushed by the load.

43. OVERHEAD WORK

All supervisors must take precautions to warn and protect fellow workers who may be endangered by overhead work. Cordoning off of the zone below the work area and the posting danger signs or a watch person is required.

44. DESIGNATED SUBSTANCES - eg: lead

- a) The existence of a designated substance in the work place, will require appropriate protective measures to be taken in accordance with regulatory requirements.
- b) The supervisor will determine the proper respiratory and clothing protection to be used by workers and ensure all workers in the area use this protective equipment.

45. HOT WORK PERMITS

Before proceeding with any open flame operation, including torch cutting or welding, all workers must check with Embassy Corporation project superintendent to determine if hot work permits are required.

46. POWER ELEVATED WORK PLATFORMS

- a) All power elevated work platforms shall be thoroughly inspected and certified by a licensed mechanic as being safe to operate. The mechanic will place a service tag at the machine's controls, indicating his name and the date of the most recent inspection and approval.
- b) All other relevant documentation shall be physically present on the machine.
ie - manufacturer's operational manual, certificate of authorization and maintenance records/logs.
- c) The supplier shall have a competent person provide instruction, demonstrations and training on the safe use of the machine to those workers who will operate it.
- d) Workers shall wear a full body harness & shock absorbing lanyard attached to platform during the machine's operation. When it is in motion.
- e) All operators shall conduct a daily maintenance and safety check prior to operating any power elevated work platform.

47. CONFINED SPACE WORK PERMITS

Under no circumstances shall a contractor or their workers perform work in confined spaces until written permission is received from the Embassy Corporation. Such confined space work shall only take place once the contractor(s) involved in the work, submit their confined space work plan and procedures to Embassy Corporation. Confined work shall only be permitted upon approval of the plan and the issuance of a confined space work permit. Co-ordination documents from the Constructor of the project must be reviewed with all parties involved in the work.

48. NO SMOKING IN THE WORKPLACE

All trade contractor employees and direct employees of the Embassy Corporation are to adhere to Ontario's recent passing of the "Smoke-Free Ontario Act" that prohibits persons from smoking in any enclosed workplace.

By definition, an enclosed workplace means;

- (a) the inside of any place, building or structure or vehicle or conveyance or a part of any of them,
 - (i) that is covered by a roof,
 - (ii) that employees work in or frequent during the course of their employment whether or not they are acting in the course of their employment at the time,
 - (iii) and that is not primarily a private dwelling, or
- (b) a prescribed area;

Prohibition

9. (1) No person shall smoke tobacco or hold lighted tobacco in any enclosed public place or enclosed workplace. 2005, c.18, s. 9

It is therefore mandatory that all trade contractor management and supervisory personnel assist in enforcing our "no smoking rule" in our units being built. It is now a legal duty that all employers enforce this regulation.

15.1

ON-SITE SIGNALLING PROCEDURES

HAZARDS DESCRIPTION

- On Project:
- Workers could be at risk of contact by vehicular equipment such as tractor trailers and dumpster vehicles maneuvering in position.

- Reversing to be kept minimal:
- DRIVER RESPONSIBILITY:
- The necessity of vehicles having to operate in reverse on our projects will be minimized as much as possible. Operators will be expected to maneuver into position in forward direction as much as practicable. Driver to ensure that they have a functional backup alarm system.
 - No vehicular equipment operator shall back up his vehicle until he is directed by a competent signal person. The driver must strictly follow the direction / signals of the signaler.

- Procedures
- COMPETENT SIGNALER – COMMUNICATION WITH DRIVER
- When vehicular equipment arrive on site, the grounds attendant or another worker [who will be competent signalers] designated by the project superintendent shall contact with the driver of the vehicle and discuss the situation and agree upon pre-arranged hand signals, blind spots and the maneuvering procedures necessary.

- Positioning
- SIGNALER POSITIONING & REQUIRED RETRO-REFLECTIVE GARMENTS
- The signaler shall position himself or herself clear of the vehicle's intended path of travel and shall be in full view of the operator and shall have a clear view of the intended path of travel. The signaler shall pay particular attention to watching the part(s) of the vehicle that the operator cannot see. The signaler shall wear a retro-reflective vest in addition to his/her other personal protective equipment.
- ESTABLISHING EYE CONTACT:
- All tradesmen who may be in the area, will be reminded, by the crew supervisor or signaler, to establish eye contact with the vehicular equipment operator before attempting to encroach upon the operator's travel zone and before crossing the operator's path of travel. The signaler should also be made aware of such attempts.
- TRAFFIC CONTROL MEASURES:
- If necessary, designated route ways will be established for tradesmen or vehicle work zones will be cordoned off with caution tape and warnings signs, to alert and restrict movement of tradesmen.

15.2

FALL PROTECTION REQUIREMENTS

WARNING! *No worker shall be exposed to heights greater than three metres when near an unguarded edge to a floor, roof, platform, opening or on a ladder without first providing guardrail, travel restraint, or fall arrest protection. Any person found doing so shall be subjected to disciplinary action. Fall protection is also required if a worker may fall into operating machinery, into water or other liquids, into or onto hazardous substances or objects regardless of height.*

EQUIPMENT STANDARDS AND SET-UP:

All fall protection system components used must carry a C.S.A. label and meet the C.S.A. National Standards of Canada standards as stated in Section 26.1 (3) of the Ontario safety regulations for construction projects – June 2002 edition. The lanyard or lifeline/lanyard combination must be secured to a permanent or temporary fixed support capable of resisting a static force 3600 to 5000 lbs for fall arrest (without a shock absorber) and 2700 lbs for fall arrest (with a shock absorber), 2700 lbs for fall restriction protection and a minimum of 900 lbs for travel restraint use. The makeup and adjustment of the fall protection system must not subject the wearer who falls, to a peak arrest *force greater than 1800 lbs.*

LIFELINES AND THEIR SET-UP: All lifelines shall be:

- 16 millimeters (5/8") diameter polypropylene or equivalent.
- used only by one worker at a time.
- free of any cuts, abrasions, other defects and protected against chaffing.
- long enough to reach the ground or be knotted at the end.
- connected at right angles to the worker's position.
- provided with a rope grab (cam lever) device for lanyard attachment to lifeline.

TRAVEL RESTRAINT PROTECTION:

This is the second preferred method of fall prevention, as this setup prevents a worker to reaching an unguarded edge, such as a typical floor slab exposure. This consists of a suitable anchorage point capable of resisting a static force load of 900 lbs. Although the applicable legislation allows for waist type belts it is the policy of Embassy Corporation to prefer that all workers to wear and use – FULL BODY HARNESSSES ONLY! This system must be adjusted so the worker cannot reach an exposed edge, therefore if he or she should trip or lose their balance they will fall on the work surface.

NOTE: ALL WORKERS SHOULD SET UP FOR TRAVEL RESTRAINT PROTECTION IF AT ALL POSSIBLE.

USE OF TEMPORARY FIXED SUPPORTS: – such as the Safety Strap

The use of such temporary anchoring points such as the Safety Strap is encouraged so long as the device is suitably installed as per the manufacturer's instructions. Builders are encouraged to provide them at multiple points on the housing unit where tie-offs for the tradesmen will be required.

FALL ARREST PROTECTION:

In the normal course of setting up for Fall Arrest protection where a worker is not at risk of “Bottoming Out” - that is hitting an object, level or ground below the work, it is expected that a Shock Absorber Device will be part of the worker’s fall arrest equipment setup. Shock absorber devices assist in limiting the peak arrest forces applied the wearer in a fall to 1800 lbs or less. However, if a risk of “Bottoming out” exists, the following applies:

EXCEPTION RULING – REMOVAL OF SHOCK ABSORBER DEVICE!

Section 26.6 (4) states that the fall arrest system shall not include a shock absorber device, if wearing or using one could cause a worker to hit the ground, an object or level below the work. Without the use of a shock absorber device, we expect the wearer to shorten up on his or her system components in order to minimize the amount of free fall.

FALL RESTRICTION PROTECTION:

This consists of an assembly of components that is attached to an adequate fixed support on the project and is designed and arranged in accordance with the manufacturer’s instructions, so that a worker’s fall distance does not exceed 0.6 metres [2 feet].

GUARDRAIL PROTECTION:

Guardrails consisting of a top rail, middle rail and toe board must be provided around work platforms, ramps, and open areas where a worker can fall from one level to another. Temporary removal of a guardrail by workers in order to perform work, will require the worker(s) to protect themselves by use of either travel restraint or fall arrest protection methods and take appropriate measures to cordon off the work area and post signs warn others to stay clear. The guard railing must be re-installed once the work is completed.

COVERINGS OVER OPENINGS:

It is generally expected that openings are to be guardrailed if at all possible. When coverings are required however, planking laid tightly side by side shall be the material of choice, or such material suitable to support and resist all anticipated loads with a minimum live load resistance of 50 lbs per square foot. Treat all coverings to openings as flooring and set your supports on edge (treated like a joist). This adds strength to the covering. All coverings must be securely fastened and marked (identified as a covering) to prevent accidental removal. Identify all covers as “DANGER-OPENING – DO NOT REMOVE COVER”.

WORKING OFF STEP LADDERS:

Workers performing brief, light duty work off step ladders is acceptable providing no heavy exertion or body extension from ladder’s vertical plane will be necessary. Workers must lock step ladder braces in place and stay off its the top rung or shelf. Workers up higher than three metres on a ladder or higher than and in close proximity to guard railing, must wear, set-up and use fall arrest protection. If heavy exertion or body extension is a consideration, scaffolds or other work platforms should be used. Workers should never straddle themselves between a ladder and another surface. Never use a step ladder to mount or dismount from surfaces.

15.3

EMERGENCY RETRIEVAL PROCEDURES FOR RESCUE OF A WORK SUSPENDED ON A FALL ARREST SYSTEM

Note: Generic Retrieval Procedures only - must be customized for each project!

In the event a worker falls and is arrested by fall arrest system, it is imperative that the following rescue procedures be taken to retrieve this worker within fifteen minutes from the time of suspension. Being suspended for prolonged durations beyond fifteen minutes could cause serious internal injury to the worker.

Communications:

All workers will be informed of these procedures and the project superintendent will organize the rescue process. Hand held radios or telephones should always be available by project superintendents to notify the constructor of a fall arrest event.

Retrieval Procedures:

1. Emergency facilities, including site safety personnel shall be immediately notified when a worker has fallen and is suspended by his/her fall arrest system.
2. All work is to be suspended in the area near the fallen worker, until such time as the worker has been rescued and the fall event has been fully investigated.
3. Where possible, the suspended worker is to be secured by secondary means of support (another lifeline, rope, etc.).
4. One person is to be designated to remain in constant contact with the fallen worker, and shall continuously monitor the fallen worker's condition and maintain contact with the rescue team. This designated person shall be tied off through the use of appropriate fall protection equipment and shall at no time exposed herself/himself to the hazard of falling.
5. The fallen worker shall NOT attempt to release, or disable the descent control device, or shall he/she attempt self-rescue.
6. **POWER ELEVATING WORK PLATFORMS:**
In the event there is a power elevating platform available on the project, (of
7. **THE RESCUER** should be equipped with a First Aid Kit and be a qualified first aider who can render treatment if necessary to an injured suspended worker.
8. The worker, once he/she has been recovered, shall be immediately removed to the nearest health care facility or medical attention.

Retrieval procedures continued

9. No work may commence until all investigations have been completed, and where required, recommendations implemented to prevent a recurrence.
10. All components of the fall arrest system involved in arresting the worker in the fall shall be gathered and taken out of service. This equipment (used in the fall arrest event), shall only be reused once it has passed the manufacturer's tests and approvals for reuse.

LADDERS:

In the event there is no power elevating work platform or crane equipped with a retrieval "man basket" available on the project, an extension ladder, suitable to reach the necessary height, will always be made available at the workplace. At least two workers will be summoned by the project superintendent to assist in securely setting up a ladder beside the worker suspended on his/her lifeline. The suspended worker will be asked to mount this ladder from his suspended position and fellow workers will hold the ladder stable for this purpose.

EXTREME HEIGHTS:

In this situation, only a crane of sufficient capacity and reach, equipped with an approved man basket or other retrieval device, or a properly equipped fire rescue vehicle equipped with an extension ladder of sufficient reach (outside of fire rescue service authorities), is to be used.

Should the heights involved cannot be reached by the equipment on site, the local Fire Department should be called in to assist in the rescue.

RESCUE TEAM CO-ORDINATION:

One person must be designated as the team co-coordinator ("person in charge") and should have a thorough understanding of the retrieval procedures to follow. All persons assisting in the rescue shall co-ordinate their efforts through the direction given by the Team Co-coordinator. There must be verification of the crane operator's knowledge and understanding of the rescue requirements, and this should apply to all crane operators working on the construction project. Meetings should be held to convey these rescue and retrieval procedures to all persons who may possibly be involved in the rescue.

15.4 SAFE WORK PLANNING FOR CARPENTRY CREWS

BEAM PLACEMENT ON FOUNDATIONS:

The carpentry contractor shall ensure all crews follow written safe work procedures for the placement of steel beams on unit foundations. Utilize proper beam placement guidelines. Do not try to hand place these beams! Use approved boom apparatus, capacity rated rigging and hoist equipment.

RAMP ACCESS TO FRONT OF UNITS:

Prior to the first floor deck being installed, the crew leadhand shall ensure a ramp of at least 18" inches in width, cleated with (1.5" x 1.5" inch strips of wood, set 300 mm apart) and secured in place, shall be set up in front of unit's foundation. If ramp height exceeds four feet, install a handrail.

LADDER ACCESS TO FLOOR LEVELS UNDER CONSTRUCTION:

Carpentry crews must not access floor levels by climbing the walls or using free standing step ladders. Use a ladder built to regulatory specifications and ensure it extends three feet above the top landing area and secured top and bottom. Do not hand carry anything up or down a ladder.

GUARDRAIL AND COVERING PROTECTION TO DROPS OR OPENINGS IN UNITS:

Guardrails built to regulatory specifications shall be installed around all floor openings and drops as the work progresses in the unit. If coverings are installed over floors, set the cross supporting members on edge (treat them as joists) to afford maximum protection and nail covering secure to deck and identify as a cover. Window openings with sills lower than 36" inches, shall be top railed, where risk of falling 2.4 meters (8 feet) or more exists. Install guard rails on first floor walls so they are available for second floor fall protection when they are tilted into position.

SECOND AND THIRD FLOOR FALL PROTECTION:

All carpentry contractor leadhands shall ensure that their workers are protected from falling from 2nd and 3rd floor edges and drops, while decking and walling. Either a guardrail system, travel restraint or fall arrest protection measures must be set up and used by workers. Travel restraint protection is the preferred method when guardrails or coverings are not possible to install.

FALL PROTECTION FOR ROOF WORK:

Appropriate tie-off points are required for travel restraint protection measures and the crew foreman should ensure such suitable tie-off points are available and used. Remember the temporary fixed support used for travel restraint protection has to resist 450 pds with a safety factor of two = 900 pds. Approved safety straps devices installed correctly to a suitable fixed support is acceptable.

STAIRS INSTALLMENT AND HANDRAILS TO STAIRS:

Once the 2nd floor is decked, the ladder used to access the floor, shall be replaced with a suitable temporary or permanent stair and the stair shall be equipped with handrails on its open sides and guardrails to any flight landings.

PRECAUTIONARY MEASURES IN HIGH WINDS:

Carpenter crew foremen must ensure their workers take extra measures to suitably brace walls against high winds. Carpenters should not attempt to hand carry materials when the wind is forceful as they could be blown off balance and fall. High winds of 35 kmph or more is reason enough to cease work operations until winds subside.

HOUSEKEEPING IN UNITS:

Carpenters are required to keep their respective work surfaces in the unit free of scattered wood cuttings, banding straps and debris. Gather such material into piles, at specified areas near the unit, as designated by the builder, and remove it daily or as often as necessary to prevent trip/slip hazards. This applies to the exterior grounds as well, particularly in snow covered conditions as this poses an increased risk to workers.

ELECTRICAL CONSIDERATIONS:

Ensure that all electrical cords used for your power tools are sourced to a ground fault circuit breaker interrupter device fitted at the power panel. Check your electrical cords and tools daily for any cuts, breaks and defects. Such defective equipment should be taken out of service. Remember to exercise caution when working near overhead electrical hydro lines.

WOOD WORK PLATFORM CONSTRUCTION:

Work platforms must be cross braced both on the Vertical and Diagonal planes to ensure stabilization and strength. Planking used to support workers should be of the rough sawn variety of number one grade spruce, pine or fir wood. Mid-shore planks that create a span that will exceed the material unit stresses of the material, between support ends. Cleat or otherwise secure these planks from slipping out of position.

CREW SUPERVISOR CHECK UP RESPONSIBILITY:

Prior to any crew workers entering a unit at the beginning of their shift, the crew supervisor must conduct a thorough check of the unit for any actual or potential hazards or protective and access device deficiencies, and correct as required, prior to commencing work.

CREW SAFETY TALKS BY SUPERVISOR:

One of the best methods of maintaining a high level of safety awareness and education is by the crew foreman conducting weekly crew safety talks. This is an excellent "due diligence" exercise which could provide a good defence in a court of law.

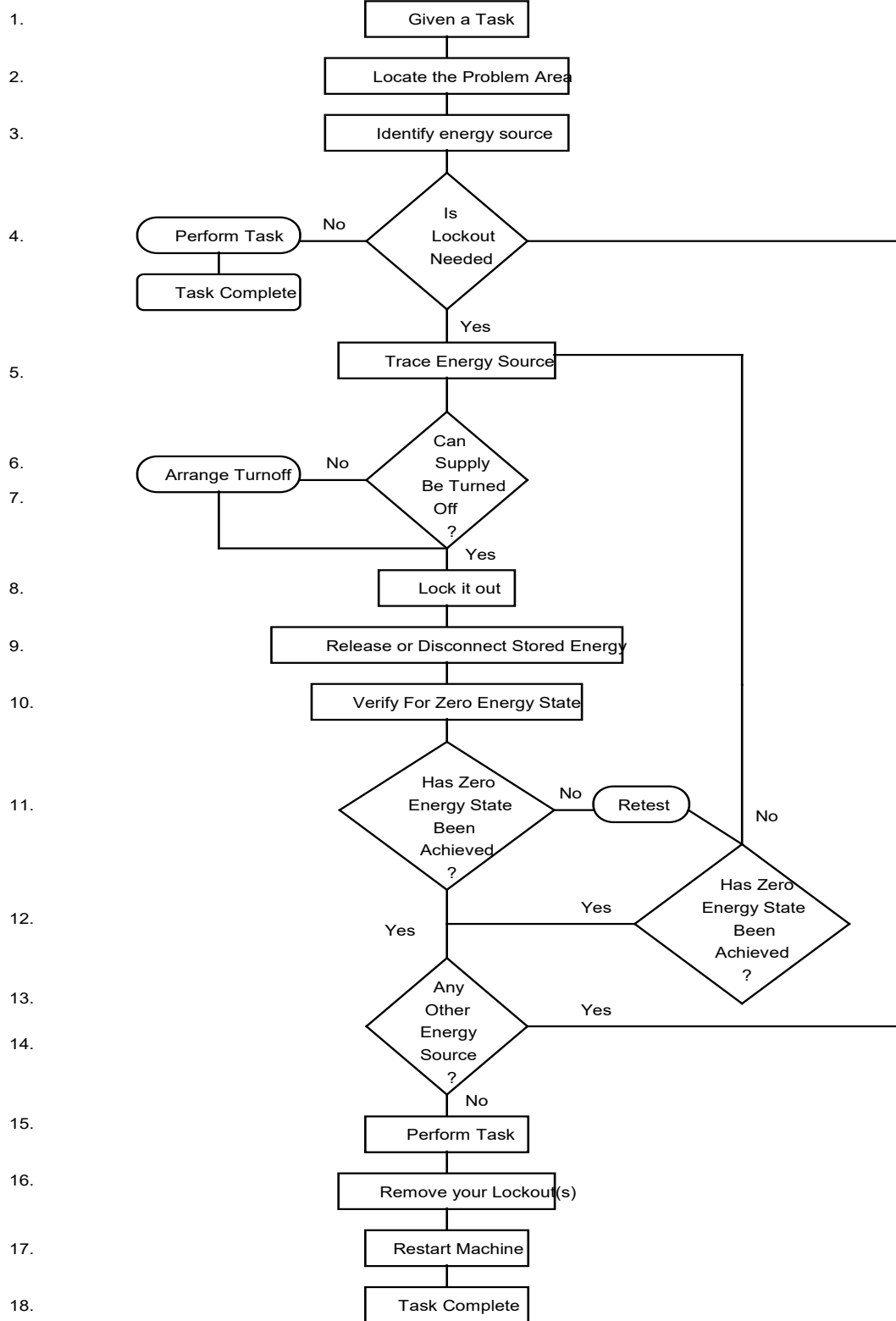
15.5

SCAFFOLDING COMPLIANCE GUIDELINES

1. THE ERECTION, ALTERATION AND DISMANTLING OF SCAFFOLDS MUST BE CARRIED OUT UNDER THE SUPERVISION OF A COMPETENT PERSON.
2. SCAFFOLDS MUST BE SUPPORTED ON SOLID OR COMPACTED SURFACES.
3. HAVE FOOTINGS, SILLS, OR SUPPORTS THAT ARE SOUND, RIGID AND CAPABLE OF SUPPORTING TWO TIMES THE MAXIMUM ANTICIPATED LOAD WITHOUT SETTLEMENT OR DEFORMATION OF THE SCAFFOLD.
4. BE TIED (SECURED) TO THE BUILDING AT VERTICAL INTERVALS, NOT EXCEEDING THREE TIMES THE LEAST LATERAL DIMENSION OF THE SCAFFOLDING. IF THIS IS NOT POSSIBLE, GUY LINES SHALL BE USED.
5. HAVE ALL FITTINGS, INCLUDING FOOT PLATES, SCREW-JACK LEGS, COUPLER PINS, CASTORS, BRACES, INSTALLED IN ACCORDANCE TO THE MANUFACTURER'S INSTRUCTIONS AND DESIGN DRAWINGS.
6. HAVE ALL WORK PLATFORMS EQUIPPED WITH GUARDRAILS CONSISTING OF A TOP RAIL, MIDDLE RAIL AND TOE BOARD. ALL OPENINGS TO PLATFORMS ARE TO BE SECURELY GUARDRAILED OR COVERED.
7. BE PROVIDED WITH SECURED LADDER ACCESS TO WORK PLATFORMS.
8. SCAFFOLD PLATFORMS SHALL CONSIST OF ROUGH SAWN (2" X 10") PLANKING OF SOUND NO. 1 GRADE SPRUCE QUALITY AND BE SECURED FROM SLIPPAGE BY CLEATING OR OTHER MEANS.
9. LOAD ALL CUBES OF MASONRY BRICK DIRECTLY OVER SCAFFOLD FRAMING.
10. HAVE CLEAN PLATFORMS AND GROUNDS, FREE OF ICE, SNOW, OIL, DEBRIS, AND OTHER SLIPPERY MATERIAL TO PREVENT TRIPPING HAZARDS.
11. WORKERS SHALL WEAR AND USE FULL-BODY HARNESSSES/LANYARDS ATTACHED TO THE PROJECT WHEN ERECTING OR DISMANTLING SCAFFOLDING, ABOVE THREE METERS IN HEIGHT.
12. SCAFFOLD PLATFORMS MUST BE AT LEAST 18 INCHES WIDE. IF THEY ARE OVER EIGHT FEET ABOVE THE FLOOR BASE, - THEY MUST CONSIST OF PLANKS LAID TIGHTLY SIDE BY SIDE, THE FULL WIDTH OF THE SCAFFOLD FRAME.
13. WHEELS AND CASTORS ON ROLLING SCAFFOLDS MUST BE EQUIPPED WITH BRAKING DEVICES ON EACH CASTOR OR WHEEL AND HAVE THE BRAKES APPLIED WHEN A WORKER IS ON THE SCAFFOLD.
14. SET UP OF STANDARD FRAME SCAFFOLDS OVER 15 METRES (50 FEET) IN HEIGHT AND TUBE AND CLAMP SYSTEM SCAFFOLDS 10 METRES (30 FEET) IN HEIGHT MUST BE DESIGNED BY A PROFESSIONAL ENGINEER AND ERECTED AS PER DRAWINGS.

16.0

LOCKOUT PROCEDURAL FLOW GRID



16.1 EXPLANATION OF LOCK-OUT PROCEDURAL SEQUENCE

1. Receive work assignment.
2. Locate the area and identify the equipment or machinery to be worked on.
3. Identify all power sources affecting the equipment or machinery, such as electrical, pneumatic, hydraulic, steam, gravity or momentum.
4. Determine whether lockout is required to perform the work assignment.
5. Locate and identify all power source components on equipment or machinery.
6. Determine whether it is physically possible to lock out each power source.
7. If lockout is required, check with qualified operations personnel before proceeding.
8. Have qualified personnel shut down the equipment or machinery. Install your personal safety lock with tag indicating name, employer, time/date and work location.
9. Any power or product remaining in the equipment or machinery must be discharged or disconnected by qualified personnel.
10. With extreme caution, try to start the equipment or machine manually.
11. Look of any movement or functions.
12. If none observed, try to restart again.
13. Look of any movement or functions.
14. If none observed, confirm that all power sources are at a zero energy state.
15. Carry out work assignment.
16. When work is complete and area ready to resume operations, remove all locks, tags, and lockout devices. Check that all personnel are clear of the equipment or machinery.
17. Have qualified personnel restart the equipment or machinery.
18. Assignment complete once equipment or machinery is operating satisfactorily.

Note: Each employee shall be responsible of hanging their own lock and tag on the equipment before starting work. No employee or other contractor may remove a lock or tag belonging to another employee. Each employee involved with lockouts shall have his or her own personal lock with & key. No locks with duplicate or master keys shall be used. If more than one employee is required to lockout and tag a circuit or piece of equipment, a multiple padlock device shall be used. Any employee who removes a tag or lock belonging to another employee or person, or overrides a tag or lock in any way, shall be subject to immediate reprimand or termination.

TAGGING AND LOCKOUT PROCEDURES

1. In-plant procedures specified by the owner or client take precedence over the procedures outlined here, providing there is no contravention of existing codes or statutes.
2. Review drawings of the system to be de-energized and de-activated to determine, and where required, confirm with the client or owner, the switches, power sources, controls, interlocks, gravity or momentum sources, or other such devices necessary to isolate the system.
3. All apparatus capable of being electrically energized or dynamically activated must be de-energized or de-activated by locking out, physically disconnecting or otherwise rendering the apparatus inoperable. Switches, power sources, controls, interlocks, gravity and momentum sources and other such devices must be appropriately tagged and personally locked out by each worker involved in the operation.
4. Test the system with a CSA certified potential test indicator to ensure that all components are de-energized and de-activated, including interlocking or dependent systems which could feed into the system being isolated, either mechanically or electrically. Potential test indicators should not be used beyond the voltage limits for which they are rated.
5. Observe the following safeguards for locking out and tagging:
 - a) After the circuit has been de-energized and locked out by the person in charge, you must be protected by personally placing your own safety lock on the disconnect switch. The key for your lock must be retained on your person while your lock is in place.
 - b) Where several workers or trades are working on the circuit/system, provision for additional locks must be made through the use of a lockout bar. This arrangement can accommodate any number of locks by placing another lockout bar in the last hole of the previous bar.
 - c) Each worker must also attach to his or her lock, a durable tag filled out with the information as outlined in *Section 188 s.(6) of the current edition of the Occupational Health and Safety Regulations for Construction Projects 213/91*. Such information required includes: the name of the worker locking out, the date and time of this locking out, and name of his employer.
 - d) You must recognize that even though the disconnect switch may be already locked, you are not protected until you attach your personal safety lock.

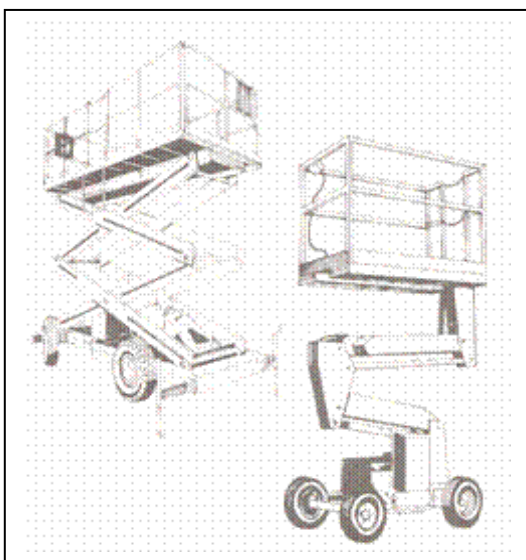
6. The de-energized electrical system must be discharged by short circuit and phase to ground. A temporary ground cable must be attached to the system and remain in place until the work is completed.
7. A record must be kept of the devices opened, locked out or otherwise rendered inoperable so that all of these devices can be reactivated once work is complete.
8. Place signs on the system indicating that it is not to be energized or operated and that guards, locks, temporary ground cables, chains, tags and other safeguards are not to be tampered with or removed until work is complete.
9. Workers testing electrical equipment must:
 - a) remove all watches, rings, neck chains or other current-conducting jewelry;
 - b) wear electric shock resistant footwear;
 - c) wear safety glasses with side shields
10. Work On or Near Energized Electrical Systems:
 - a) Two or more journeymen must work together on any energized circuit with a potential of 300 volts or more. This does not apply to testing or trouble-shooting.
 - b) Approved eye protection, insulating gloves, mats, sleeves and other protective equipment must be provided by the employer and used by employees as required.
 - c) Where workers are required to work on or around live apparatus in a manhole, vault or switch room, a suitable rescue system or lifeline of adequate length and meeting the requirements specified by law for work in confined spaces must be implemented. The rescue system or lifeline must be readily available to aid any worker in the immediate danger area. *Re: Sections 60 to 63 of Ontario's Occupational Health and Safety Regulations 213/91 for Construction Projects.*
 - d) Only a worker qualified as a journeyman electrician shall be allowed to perform work on energized lines and equipment, and if the equipment or conductor is operating at a normal voltage of 300 volts or more, a suitably equipped competent worker who is able to recognize the hazards and perform rescue operations including CPR (Cardial Pulmonary Resuscitation must be available and able to see the worker who is performing the work.
 - e) Metal ladders, or ladders with wire reinforcing, must never be used by electrical workers working on live apparatus.

Note: Any employee who removes a tag or lock belonging to another employee or person, or overrides a tag or lock in any way, shall be subject to immediate termination.

17.0 AERIAL LIFT SAFETY IN CONSTRUCTION

Embassy Corporation requires all operators of aerial lifts to be trained in its use and carry evidence of training. Operators of articulated work platform operators must:

- Do a circle check and ensure all components are in good condition. Use a checklist provided by the manufacturer.
- Report any defects observed to your supervisor.
- Ensure all manuals, signs and inspection slips are on the lift and including the engineer's certificate of authorization.
- Ensure that the lift is suitable for the surface it is to be operated on.
- Ensure the operator and any passengers are wearing their harnesses or waist belts with lanyards connected to an attachment point specified by the manufacturer – PRIOR TO AND DURING OPERATION OF CONTROLS.
- Ensure gates or chains to the platform rails are engaged
- Be aware of overhead electrical hazards and keep clear.
- Do not operate lift in a manner that will affect its stability.
- Do not stand on platform guardrails to reach above.



Do not load guardrails with materials as they may fail or you may affect the stability of the machine.

Become familiar with and follow all manufacturer safe operating instructions

Elevating work platforms should not be used as a means of access to levels.

18.0 Working Near Electrical Installations during operations

- HAZARDS:**
1. Risk of electrical shock by contact or encroachment to electrical equipment on roofs and buildings.
 2. Risk of electrical shock during screw down of materials.
 3. Risk of electrical contact with overhead hydro wires during hoisting and material handling operations.

ASSESSMENT MEASURES:

1. **Electrical Hazard Assessment of Project:**
The Embassy Corporation project manager in collaboration with the crew foreman shall through discussion with the owner's or builder's superintendent, determine the electrical hazard risks associated with the work.
2. **Written project specific electrical protection plan:**
A written project specific electrical protection plan shall be devised based on the hazard assessment and communicated to all personnel associated with and in the operation zone.
3. **Preventative Measures:**

During hoisting operations

- a) Prior to hoisting a determination shall be made as the amount of voltage flowing through any overhead hydro wires nearby and based on the voltage rate, stay a safe distance clear of such wiring as specified in Section 186 of the O.H.&S. regulations for construction projects 213/91.

Column 1	Column 2
Nominal phase-to-phase voltage rating	Minimum distance
750 to 150,000 volts	3 metres
more than 150,000 to 250,000 volts	4.5 metres
more the 250,000 volts	6 metres

A competent person shall monitor the clearances and stop the hoisting operation should the crane operator encroach upon the clearance distances specified in the table above. Post dangers signs as applicable.

Crane operator:

The crane operator shall be provided with written notification of the electrical hazard before beginning work. Also a legible sign, visible to the crane operator shall be posted in the operator's cabin, warning of the potential electrical hazard.

19.0

SAFE EXCAVATION GUIDELINES

1. KNOW THE REGULATIONS APPLICABLE TO THE WORK:
Prior to any excavation being done, the Embassy Corporation project superintendent, the excavation supervisor and machine operators, shall review the safety regulations pertaining to trenching and excavations. Re: Part III of Ontario's Occupational Health & Safety Regulations - O. Regs 222 through to reg. 240. All workers having to work in such excavations shall be orientated to and be made to understand the potential and actual hazards of the work and the laws applicable to the work.
2. ENSURE ALL UNDERGROUND SERVICES ARE LOCATED AND STAKED OUT:
All supervisory and operator personnel shall ensure all necessary precautions are taken to avoid contact with underground services such as gas and water lines, electrical conduits, cable, etc.. Adhere to all clearances requirements and do not dig if you are in doubt of what is underneath!
3. CLASSIFICATION OF SOIL TYPES AND PROTECTION MEASURES:
The soil to be dug shall be appropriately classified as per Section 226 and 227 and the appropriate slope cut-backs or support systems shall be used. The foreman and / or supervisor must be knowledgeable about soil type classifications found on a project. This includes an awareness that soil types and conditions can change over very short distances. The foreman must know what protection support measures is best for the job at hand, to protect his workers.
3. EXCAVATION CHECKLIST:
Prior to any excavation or trench work, the Excavation Checklist on the next page of this safety manual, shall be used to assist the excavation supervisor in ensuring that adequate safety precautions are taken.
4. EMERGENCY EGRESS:
Emergency egress has been provided so worker can get out of a trench or excavation in a hurry if necessary. Provide a secured ramp or ladder egress from the protected (shored) area of a trench or excavation.
5. WORKING NEAR OVERHEAD POWERLINES:
Extreme caution must be taken when working around overhead power lines. Equipment such as an excavator or backhoe must not be moved closer than one boom length to an overhead power line of more than 750 volts unless a signal person is stationed to warn the operator when any part of the machine, boom or load approaches the minimum distance specified in the construction regulations.

Refer to the excavation checklist on the following page

EXCAVATION CHECKLIST

1. Services at dig area have been located, staked-out and are adequately supported to prevent failure or damage. _____
2. No unreasonable accumulation of water exists in excavation. If so pump it out. _____
3. Suitable slope cutbacks or support systems in place as per regulatory standards for soil classification determined. _____
4. Suitable means of access/egress been set up within the protected area of excavation? _____
5. A tender [worker] is working above ground in close proximity to the trench or the means of access to it. The Tender is a qualified first aider. _____
6. A clear work space of at least 450 millimeters exists between wall of excavation and any formwork or other structure. _____
7. All loose materials, loose rocks, clay chunks, have been stripped from excavation walls. _____
8. A one metre level area from the upper edge of each excavated wall exists and is kept free of equipment, soil, rock and construction material. _____
9. Is the stability of the excavated walls maintained where it may be affected by stockpiling of excavated soil, rock or other materials? _____
10. Have machine and vehicle operators in area been warned to keep clear of excavated walls so wall stability will not be compromised? _____
11. Vertical walls deeper than 2.4 metres are provided with barriers 1.1 metres in height. _____
12. If support systems such as hydraulic prefabricated or engineered support systems are used, are the design drawings, specifications and placement instructions on site and are they approved by a professional engineer? _____
13. Are written opinions by a professional engineer as to the stability of the walls of the excavation on site for inspector review? _____
14. Are workers orientated to the procedures, actual and potential hazards of the work. _____
15. Are all regulations pertaining to the use and setup of support system equipment been complied to prior to workers entering these protected areas? _____
16. Is a qualified first aid attendant readily available at the work area and are emergency procedures in place and conveyed to workers? _____
17. Are appropriate measures being taken for confined space work being conducted? _____

20.0

HOT WORK ACTIVITY

PURPOSE

To ensure Embassy Corporation management and crew foreman personnel exercise the control required to ensure workers and the public are protected from fire and explosion risks during our operations.

SCOPE

Definition: Any process that may generate an uncontrolled spark or flame that could be a danger to workers. Hot work is any temporary operation involving open flame producing heat and/or sparks. This includes, but is not limited to: brazing, cutting, grinding, soldering, thawing pipe, torch applied roofing and welding.

STANDARDS / PROCEDURES

Only workers trained in the use of torches and welding gear shall be permitted to operate this equipment. Workers shall carry proof of training on their person while at work.

Physical Hazards include:

Extreme temperatures particularly during asphalt kettle operations, torch on applications, welding

Chemical Hazards include:

Fumes generated by hot asphalt, particularly during asphalt kettle operations

Fire/explosion Hazards include:

There is always a threat of a fire or explosion occurring when performing hot work. This results from either chemicals reacting with one another to form explosive or flammable mixtures or sparks from cutting and grinding. Also we risk fire or explosion if our valve and hose connections to our flammable compressed gas cylinders are not positively sealed. Damage to our feed lines and valves may also cause this event.

Personal protective equipment to be used as required:

- Respirator protection – particularly for the kettle man
- Welding helmets and shield – for anyone welding / cutting
- Welding screens – as a barrier in our shops and field operations
- Hearing protection (ear plugs) – particularly during any grinding activity
- Leather apron and gloves
- Fire resistant or fire proof clothing

Note: Employees conducting hot work are to refrain from wearing synthetic fiber clothing such as polyesters, nylon, rayon, etc. as this material will fuse into the skin and flesh if subjected to high heat. Best to use fire resistant or fire proof clothing or as a minimum cotton or wool or leather fabrics.

Protective Measures:

- Particular precautions must be adhered to when welding or cutting in a dusty or gaseous environment such as the use of adequate ventilation systems – fans, extractors, etc.
- The area in which the hot work is being completed must be cleared of combustibles, screened off with the proper welding screens and provided with suitable fire extinguishers.
- Cylinders, valves, hoses and cables must be protected against damage.
- Never feed oxygen from the cylinder into a confined area.
- Compressed Gas Cylinders kept at least ten feet away from ignition sources.
- Never allow oil or grease to come into contact with oxygen or oxy-acetylene equipment or a hose.

Fire Watch:

- Fire watch personnel shall be supplied with the suitable extinguishers in the immediate area.
- Fire watch personnel are trained in use of this fire extinguishing equipment and in sounding the alarm.
- A fire watch may be required for adjoining areas, above, and below the monitored area.
- The area must be monitored for 2 hours after a job has been completed.

Hot Work Permits:

In situations where hot work may affect sensitive equipment and systems belonging to the owner of a plant or building, HOT WORK PERMIT forms may be implemented to ensure the necessary controls are in place.

- Before hot work is to begin, the maintenance employee must verify that the location has been examined, and the precautions taken to prevent a fire.
- Once a 2 hour (monitor) fire watch is complete, the hot work permit must be signed off and filed with the company health & safety coordinator.

RESPONSIBILITIES

Worker responsibilities

- workers shall ensure they have 4A40BC type extinguisher protection readily available at the hot work area.
- workers shall ensure all valve/hose connections are soap water tested for positive seals prior to use.
- workers shall ensure compressed gas cylinders are secured from tipping and protected from damage.
- workers using torches, welding, or grinding shall maintain a minimum ten foot clearance from combustibles and flammables, including cylinders.

Crew Foreman responsibilities

- shall ensure workers are familiar with the combustible materials that make up the roof of the building.
- shall ensure a two hour fire watch is implemented after a hot work operation to check for possible fire risks
- shall ensure workers maintain the necessary clearances from combustibles and flammables at area of work.

Project Manager & Company Health and Safety Coordinator responsibilities

- the project manager and company health & safety coordinator shall ensure the foreman and employees possess safety training in torch/welding operations, kettle operations and other hot work.

- shall familiarize the foreman and workers with any specific emergency protocols the owner of the plant, or building may have in place due to presence of sensitive equipment or incompatible fugitive emissions, or chemicals they have on site.
- shall ensure that all foremen and workers implement the protection measures and controls required to meet Ontario's regulatory standards and the requirements of our safety program.

COMMUNICATION

Communication of specific procedures pertaining to hot work will be reviewed with the crew by the foreman and / or project manager prior to commencement of work through our pre-job safety assessments and crew safety talks. Communication of our general hot work standards will also be covered during the "New Hire" safety program orientation sessions.

TRAINING

All employees likely to partake in hot work activity shall be put through our Propane Safety in Construction training program provided by our safety service provider or instructor of the Embassy Corporation as per T.S.S.A. course curriculum standards. All employees regardless of company position will also be given Fire Extinguisher and Fire Fighting training. Specific reviews of MSDS sheets pertaining to the flammable gases and liquids of Propane and other relevant gases will be covered in our WHMIS training program.

EVALUATION

Our Hot Work activity standards and performances will be reviewed and assessed for its effectiveness by the company health and safety coordinator during our program annual review process and by the Joint Health & Safety Committee. Training records are maintained and kept up to date by the company health and safety coordinator.

FORMS

In situations where hot work may affect sensitive equipment and systems belonging to the owner of a plant or building, HOT WORK PERMIT forms may be implemented to ensure the necessary controls are in place. A sample of a hot work permit is illustrated on the next page.

REFERENCE

Ontario's Occupational Health & Safety Regulations 213/91 – sections 52, 53, 54, 55 & 58.

HOT WORK PERMIT

Work area must be inspected by the area supervisor before issuance of Hot Work Permit.

Department _____ Date of Inspection _____

Location _____

Describe source of ignition (e.g., torch, soldering, electric arc, etc.): _____

Special Conditions: _____

YES NO N/A

- | | | | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Welder, Fire Watch person and Supervisor familiar with welding and cutting policy. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Welding and cutting equipment in good working condition. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Workers wearing appropriate fire safety apparel and other protective gear. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Fire Watch person properly trained; knows location of fire fighting equipment. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Fire Watch person knows how to sound fire alarm. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Fire detection and/or sprinkler system in service. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Area within 15 feet of hot work area properly swept clean. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Combustibles and flammables within 15 feet of work removed or; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Combustibles and flammables protected with appropriate shields (fire blankets). |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Floor and wall openings covered. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Pipe lines or connections disconnected or blanked off if required |

WORK ON WALLS/CEILINGS

- ☐ ☐ ☐ Areas adjacent to walls being worked on checked for combustibles, and materials removed.

CONFINED SPACE WORK

- | | | | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Confined Space Entry Permit is in place. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Confined Space area cleared of all combustibles. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Space purged of all flammable vapors and/or gases. |

FIRE ALARM SYSTEM IMPAIRMENT

- ☐ ☐ ☐ Are there fire alarm devices in area that could be impacted from welding fumes or smoke?
If yes, crew supervisor must be notified of any fire alarm system impairments.

APPROVALS AND AUTHORIZATIONS

This permit is valid only so long as work conditions existing at the time of issuance. Permit expires on any change in condition that adversely affects safety in work area.

Issue Date/Time _____

Expiration Date/Time _____

Signature of H&S Representative

Signature of Area/Job Supervisor

Signature of Worker(s)

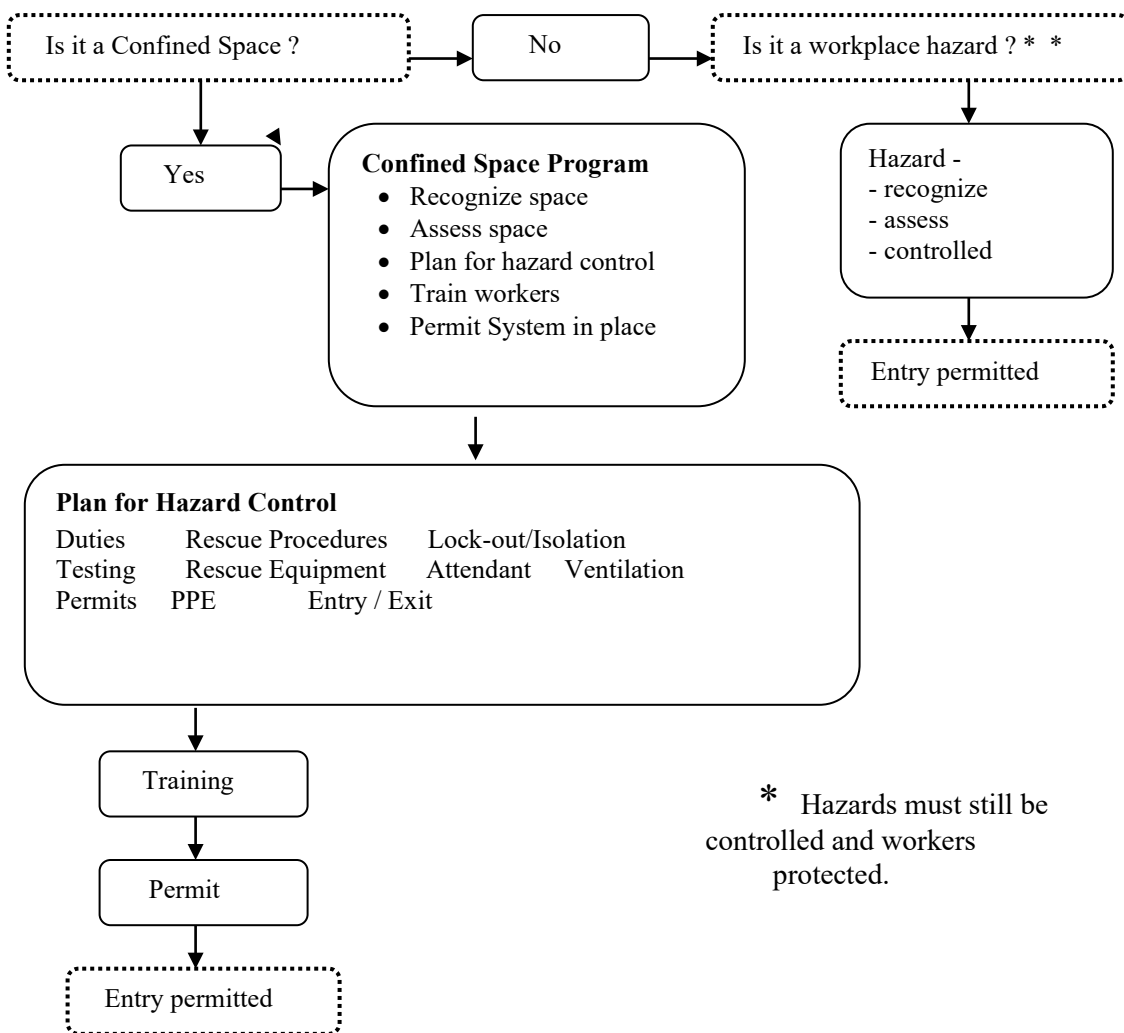
Signature of Fire Watch Person

Signature of Worker(s)

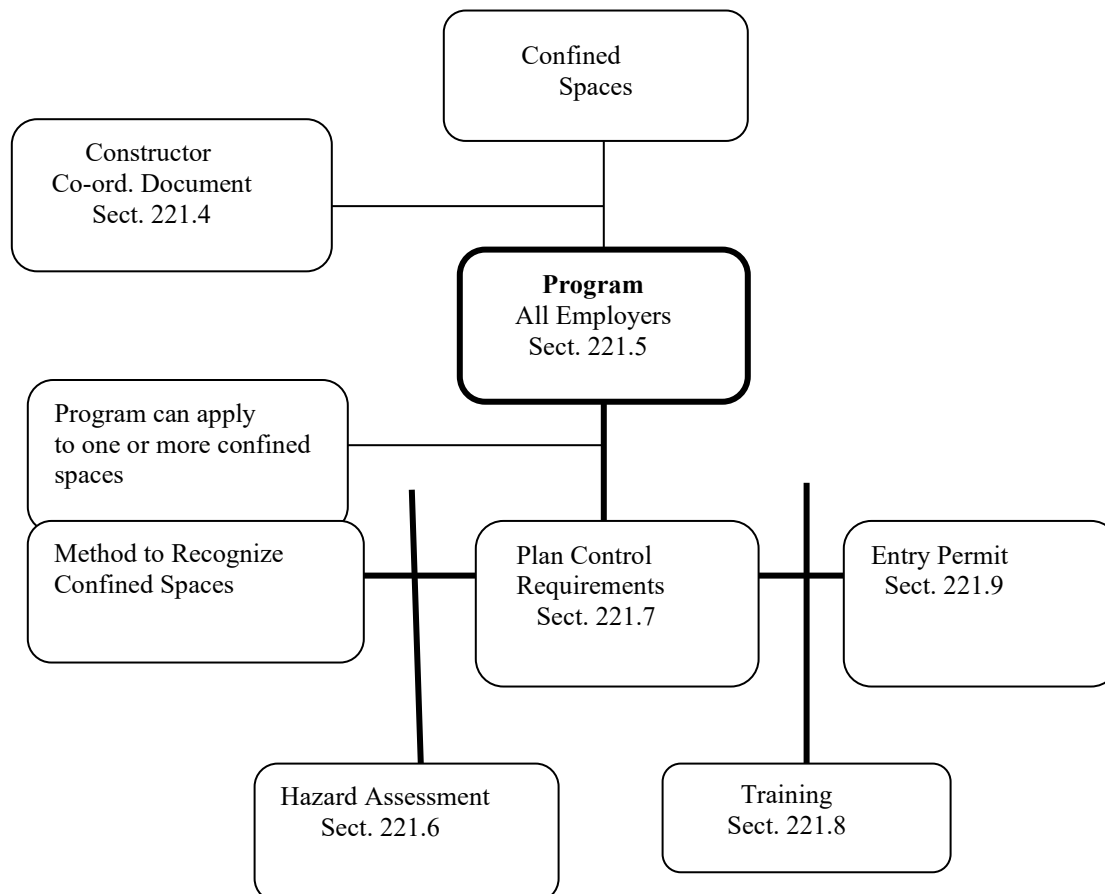
Signature of Fire Watch Person

21.0

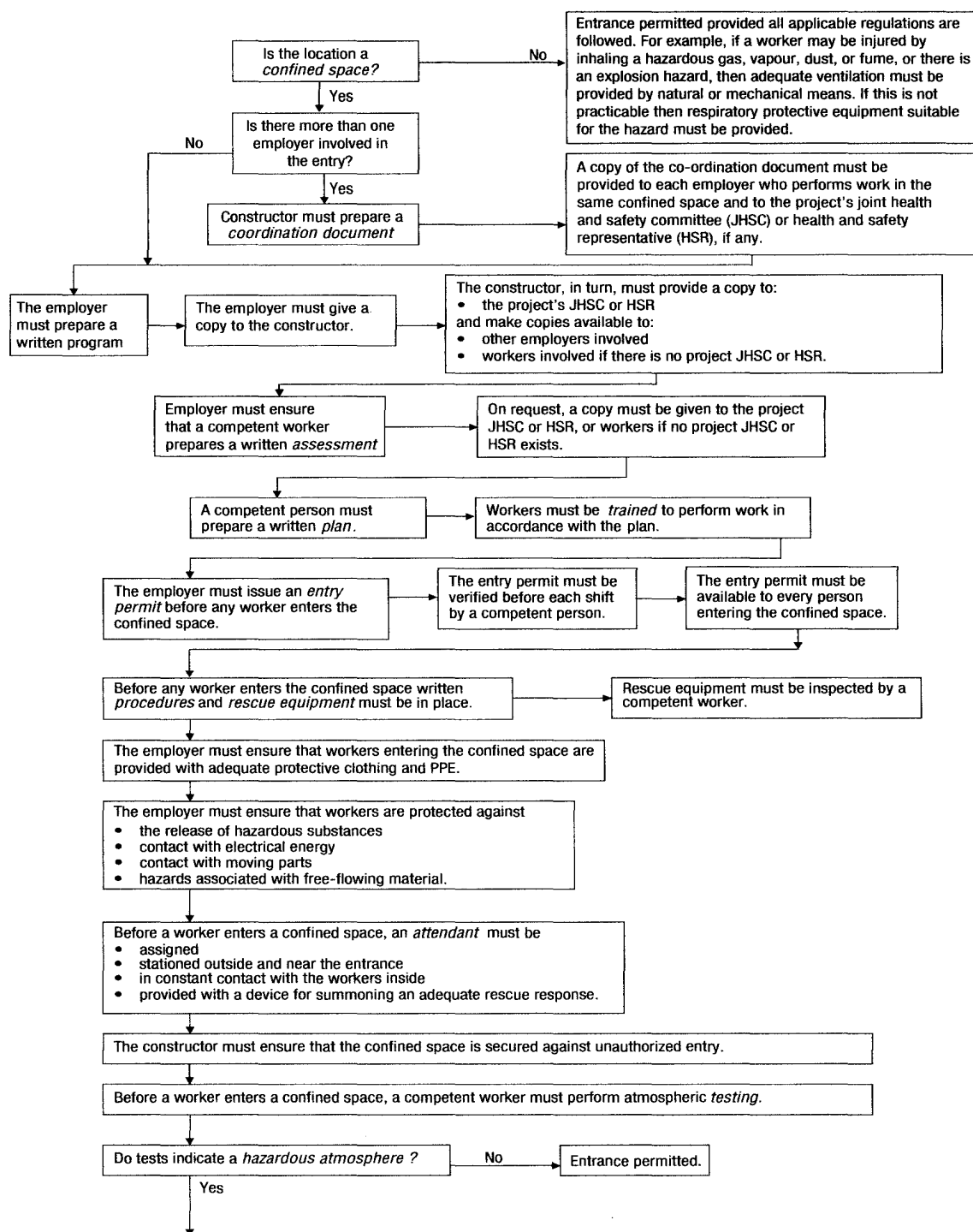
Confined Space Program Development



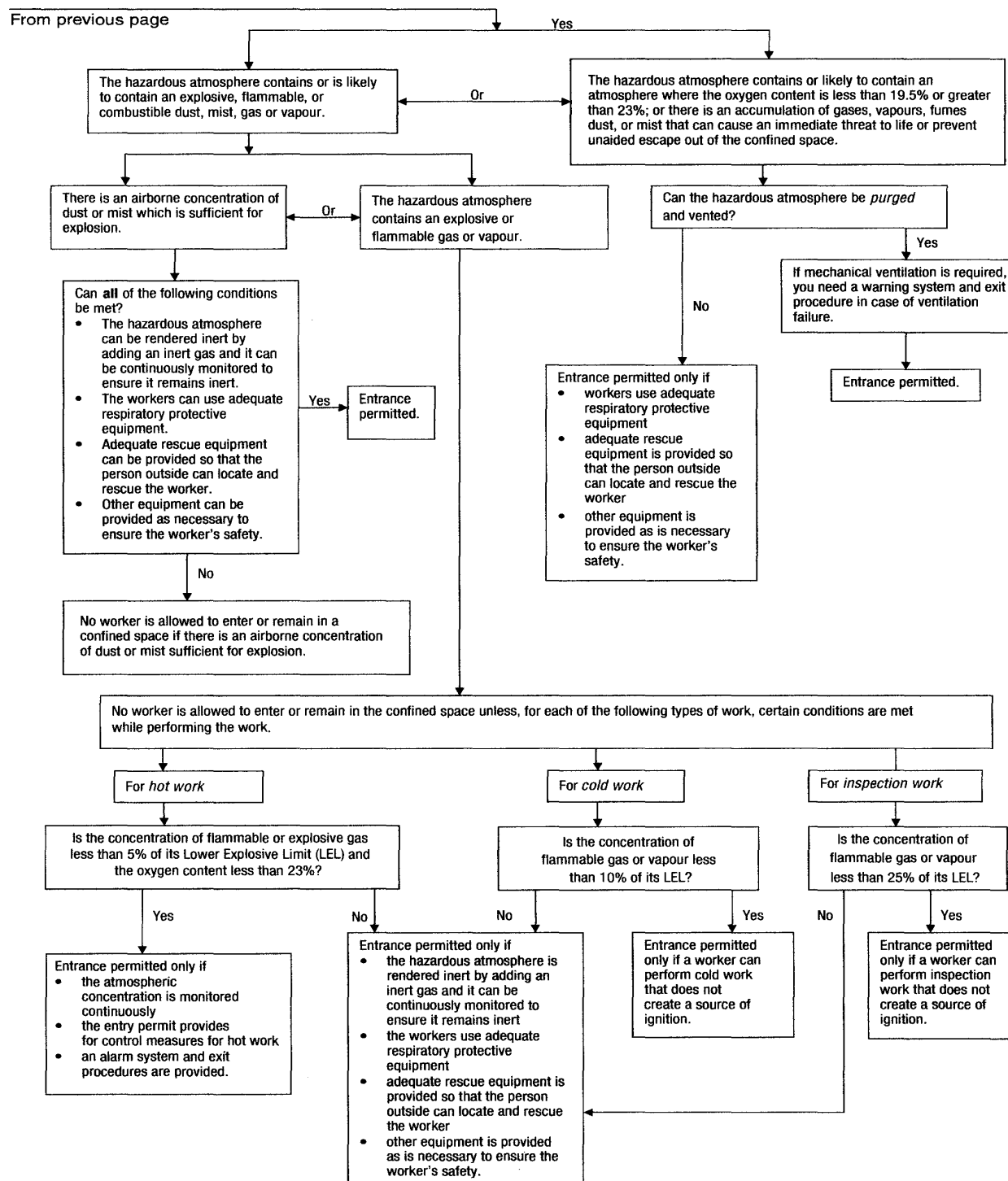
Confined Space Work Program



DECISION TREE FOR CONFINED SPACES



To next page



CONFINED SPACE WORK PROCEDURES

Definition: 1. A fully or partially enclosed space that is not designed or intended for human occupancy.

2. Where because of its construction, location or contents, or work activity therein; the accumulation of a hazardous gas, vapour, dust or fume or the creation of an oxygen deficient or enriched atmosphere may occur.

The employer shall assign the responsibility for development and implementation of the plan to a competent person. The plan shall take into consideration as many of the following as are applicable:

1. Isolation, lockout and tagging of hazards.
2. Control of sources of ignition.
3. Movement of materials.
4. Ventilation and purging.
5. Explosive and flammable atmosphere.
6. Lighting.
7. Alarms and other means of communication.
8. Means and methods of access and egress.
9. Personal protective and safety equipment.
10. Atmospheric testing.
11. Emergency equipment.
12. Emergency response procedures.
13. Warning signs and barricades.
14. Tending workers, including the frequency of checks of workers in confined spaces.
15. Any additional procedure necessary to ensure the safety of workers during entry to a confined space.

The employer shall ensure that every worker who enters, exits or occupies a confined space follows the plan.

GENERAL REQUIREMENTS TO RECENT CONFINED SPACE REGULATION AMENDMENTS

Co-ordination Documents

Recent amendments require the constructor and the employers to prepare a **co-ordination document** that addresses all regulatory requirements in regards to the "confined space work plan". The co-ordination document must be used to inform and educate all parties involved in the confined space work, including workers and shall be combined with a "confined space work permit" in order to carry out the work plan in a safe and orderly manner.

Responsibility Roles

The **Supervisor** responsible for the organization and performance of the confined space work

- The Supervisor shall assure adequate protection is provided to the entrants by verifying adequate lockout & tagout and that all hazards are securely isolated and de-energized.
- The Supervisor shall support the attendant's authority in controlling access to a confined space.
- The Supervisor shall verify that all personnel have exited prior to closing the space.
- The Supervisor shall assure that all personnel involved are aware of the hazards associated with the space.
- The Supervisor shall assure that rescue services are readily available prior to entry.
- The Supervisor shall ensure that workers work in compliance to all regulatory statutes applicable to the work.

The **Atmospheric Tester** responsible for the gas test evaluation and monitoring of the confined space work

- Shall be competent to perform tests as often as necessary before and while a worker is in the confined space.
- Shall test the confined space prior to each and every entry if space has been unoccupied and unattended.
- Shall use calibrated instruments that are in good working order and are appropriate for hazards to be assessed .
- Shall ensure the results of every sample of a test are recorded in a test log
- Shall record gas test readings at adequate time intervals if continuous monitoring equipment is used
- Shall perform atmospheric tests in a manner that does not endanger the person performing them.
- Shall state in writing whether or not the atmosphere of the confined space will endanger workers entering it.

The **Attendant (Tender)** is the watch person who is near the confined space entrance

- The attendant shall be posted near the entrance for the duration of the work.
- The attendant shall be in constant communication with the entrants and monitor the safety of workers inside.
- The attendant shall ensure all entrants sign the sign-in log when entering the space and sign out when exiting.
- The attendant shall maintain the permit and sign in log, post it at the entrance area for the duration of the work.
- The attendant shall monitor entrants during the job and during entry & exit to help ensure their safety.
- The attendant shall summon an adequate rescue response should there be a need for rescue assistance.
- The attendant shall monitor atmospheric conditions in the space prior to and during entry – must be competent
- The attendant shall control access to the confined space – no unauthorized entry.
- The attendant shall assess hazards in and around the space, and take action on the same.

Note: The attendant may not abandon his post for any reason while personnel are in the space unless relieved by another qualified attendant. Designated Attendant is: Name _____

The **Entrant** (workers entering CFS)

- The Entrant shall assure that the space has been adequately ventilated, isolated, emptied, or otherwise made safe for entry.
- The Entrant shall immediately exit a space, without question, upon word of the attendant, regardless of reason.
- The Entrant shall follow all safety rules and procedures that apply to the job.
- The Entrant shall be familiar with the work to be performed and the procedures that apply to the job.
- The Entrant shall use the appropriate PPE as required by his or her supervisor.

Worker Training Records

Sec. 221.10 Worker training:

All workers involved in the confined space work, including the rescue process shall be adequately trained in the rescue response procedures and use, inspection and maintenance of the rescue equipment. Rescue equipment options are listed on the Confined Space Permit.

Type of training provided:

Hazards Recognition ☐ First Aid / CPR ☐ Safe Work Procedures ☐ W.H.M.I.S. ☐
Rescue Procedures ☐ Rescue Equip ☐ Fall Protection ☐ Gas Monitors ☐

Instructor: Name _____ Company _____

Instructor: Name _____ Company _____

Person(s) Trained:

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

Name: _____ Training _____ Training Date: ____ / ____ / ____

CONFINED SPACE ENTRY PERMIT

Date:

Contractor:	Name:
Foreman:	Location:
Type:	Start:
	End:

Air Levels

Checked by:

Explosive	Oxygen	Toxins	Others
-----------	--------	--------	--------

Pework Inspection

Checked by:

Ventilation <input type="checkbox"/>	Watcher <input type="checkbox"/>	Lighting <input type="checkbox"/>	Rescue Plan <input type="checkbox"/>
Communications <input type="checkbox"/>	Lockout <input type="checkbox"/>	PP Equipment <input type="checkbox"/>	Extinguishers <input type="checkbox"/>
Signage <input type="checkbox"/>	First Aid Person <input type="checkbox"/>	Others	

Workers In:

Workers Out :

Signature	Time	Signature	Time
Signature	Time	Signature	Time
Signature	Time	Signature	Time
Signature	Time	Signature	Time

Standby Watcher

Signature	Time	Signature	Time
-----------	------	-----------	------

_____ authorizes the work to proceed in accordance with the above conditions and applicable regulations.

_____;

This permit is to be posted at the point of access to the Confined Space.
Return completed permit to the Safety Coordinator when the work is completed.

22.0 WORK PERMITTING

22.1

POLICY

PRIOR TO COMMENCEMENT OF ANY WORK EMBASSY CORPORATION WILL COMPLY WITH THE OCCUPATIONAL HEALTH AND SAFETY ACT AND REGULATIONS INCLUDING:

- Regulations for Construction Projects.
- Regulations for Health Care and Residential Facilities (where applicable).
- Regulations for Industrial Establishments (where applicable).
- Any other relevant Acts and Regulations.

EMBASSY CORPORATION UNDERSTANDS NON-COMPLIANCE WITH THE APPLICABLE REGULATIONS CAN LEAD TO APPROPRIATE ENFORCEMENT ACTION AND ALL DISCIPLINARY ACTION WILL BE DOCUMENTED AND PLACED IN EMBASSY CORP'S. PERSONAL PROJECT FILE FOR FUTURE EVALUATION.

22.2

PROCEDURES PRIOR TO STARTING WORK

Prior to starting work Embassy Corporation will forward to the Owner Representative:

- Notice of Project to the Ministry of Labour (when applicable).
- Current WSIB insurance Certificate.
- Insurance (as specified in Contractor Documents).
- Embassy Corp's. Health & Safety Program.
- A site safety plan (see template in section 3.8) –
- Permit (Refer to section 5.1 for details of Activity Permit).
- A separation plan (see section 16) –

-Keep on site, copies of the Material Safety Data Sheets (MSDS) for all WHMIS-controlled and hazardous products brought on site ready for review when requested. MSDS cannot be older than 3 years.

- Hazardous and controlled products must be stored in accordance with good practices and as may be required under the Ontario Fire Code.

- Hazardous building materials that contractors may encounter at SickKids include, but not limited to, asbestos, mercury, lead and silica.

All Embassy Corporation workers will be provided with a designated substance report or notification letter pertaining to their specific project scope of work.

In case of accidental discovery of suspicious material, Embassy Corporation shall notify the Owner Representative. They will determine how the suspected hazardous material will be appropriately identified, evaluated and

controlled.

If Embassy Corporation unintentionally disturbs any suspected hazardous material, work will be stopped immediately and the site supervisor and Manager/Coordinator shall be notified.

22.3

SUBMITTING A SAFETY PLAN

PRIOR TO THE START OF ANY WORK, EMBASSY CORPORATION WILL SUBMIT A CONSTRUCTION SITE SPECIFIC SAFETY PLAN TO PROJECT MANAGER. SAFETY PLAN WILL INCLUDE:

- a. Scope of Work: narrative of the project scope associated with your contract including schedule and major project milestones.
- b. Designated On-Site Supervisor and Safety Representatives: include contact information
- c. Safety Orientation Program: process to orient workers and subcontractors to your safety rules and expectations including ongoing toolbox safety talks.
- d. Hazards Communication Program & Incident Reporting/Inspection
- e. Hazard Assessment: identification of hazards associated with defined project tasks. Please elaborate on highly hazardous tasks associated with the work (crane picks, scaffolding, working at heights, confined spaces, utility shut-downs, lockout/tagout, hazardous material abatement, hot work, trenching, etc.).
- f. Site Specific Emergency Response Plan & 24-hour emergency points of contact
- g. Site Logistics Plan: plan shall address staff/patient/public protection (including infection control), traffic plan, equipment and lay-down areas, site security, tire washing, emergency evacuation muster points, etc.
- h. PPE requirements
- i. Accident Reporting and Investigation Procedures
- j. Safety Audit/Inspection Procedures
- k. Project Clean-Up Plan: detail how your company plans on keeping the workplace clean and free of potential hazards.

22.4

SUBMITTING AN ACTIVITY PERMIT

ALL WORK TO BE PERFORMED BY EMBASSY CORPORATION WILL REQUIRE AN AUTHORIZED ACTIVITY WORK PERMIT. EMBASSY CORPORATION AND ALL SUBCONTRACTORS WILL ABIDE BY THE SPECIFICATIONS AND REQUIREMENTS SPECIFIED IN THE ACTIVITY PERMIT.

PROCESS

The Owner Representative shall work with Embassy Corporation to complete an activity permit for review and approval for any work undertaken on the job site. The start of work will not be permitted until the completion and authorization of the activity permit. The authorization of an activity permit is contingent on the submittal and review of required documentation outlined on the activity permit forms. The Owner Representative and Embassy Corp. understands sufficient time is required to review, as this could impact the permit authorization process and the start of work.

22.5

SHUTDOWNS AND SYSTEM BY-PASS

When Embassy Corp. requires a system by-pass or shut down, a request form (found in Sick Kids Procedures for *Construction, Renovation & Physical Plant Projects* manual) will be filled out and submitted by 1:00pm, 48 hours in advance of any work. Embassy Corp. will ensure the system has been bypassed with plant operations before any work takes place that may activate the system. Embassy Corp. is to notify plant operations, at the end of each day that the work for the day is completed and ensure that the fire alarm system is re-activated before leaving.

For shutdown of major building systems, (i.e. medical gases, water lines, sprinkler system, electrical panels). Embassy Corp. will complete the Shutdown Request Form and submit to the appropriate SickKids Project Manager/Coordinator at least twenty business days prior to the planned shutdown. The minimum 20 business day notice is to allow the hospital sufficient time to investigate on what impact the shutdown may have to the facility.

23.0

SITE PROTECTION, SECURITY, ACCESS CONTROL

23.1

USE OF CONSTRUCTION HOARDINGS TO ENSURE PATIENT, STAFF AND CONSTRUCTION SAFETY

Construction projects will preserve a safe, clean and professional environment for the benefit of the general public. They must also create robust and secure work areas for contractors.

All hoarding shall be built in such a fashion so that they will not create or present any health and safety risks for SickKids patients, visitors, or staff. This includes, but is not limited to loose materials, sharp edges, raised nails/screws, or any slip/trip/fall hazards.

Site hoarding should have appropriate site health and safety signage by Embassy Corp., construction notices to inform the public on the construction project number and name, and should contain the contact details of the constructor and the hospital project manager.

(Refer to Appendix G of Sick Kids Procedures for *Construction, Renovation & Physical Plant Projects* manual for full details on site protection.)

All materials used in the construction of hoardings must meet or exceed the requirements specified in CSA Z317.13-17. In addition all materials must meet any OHSA, Ontario Fire Code, and Building Code requirements.

23.2

SITE SECURITY AND ACCESS

The construction hoarding must be designed in such a fashion that it can be secured from unauthorized access when not occupied. Doors should swing into the construction site and whenever possible be equipped with a self-closing mechanism.

SickKids is maintained in accordance with the IAW *Ontario Fire Code*.

Contract documents should identify proper hoarding location by the Consultant prior to tender award.

All components of the fire system, voice communication systems and means of egress shall be maintained in operating condition IAW *Ontario Fire Code** (selected code references have been included)

In the event that there is an impact to the means of egress, fire alarm systems, fire sprinkler systems fire alarm devices or voice communications the hospital Fire Marshal is to be contacted to complete a site review of the area prior to the start of the project.

Alternate measures for access to egress and fire protection will be determined during site review of the area prior to tender documents being issued.

Projects must allow for patient, staff and workers to access a fire exit at all times (refer to Section 2.4.2). In the event that a construction hoarding will restrict or block off a fire exit, the SickKids Fire Marshal should always be involved in planning for rerouting traffic and providing alternative access points.

Depending on scope of the construction the City Of Toronto Building Inspector may need to be consulted by the Project Manager to confirm the plans being made.

(Continue to Refer to Appendix G of Sick Kids Procedures for *Construction, Renovation & Physical Plant Projects* manual for all required information)

CORPORATE ENVIRONMENTAL POLICY PROGRAM & PROCEDURES

Prepared on Jan.01, 2023

by: Embassy Corporation

Environmental Control Plan

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1.0 ENVIRONMENTAL POLICY STATEMENT

Environmental protection is considered to be an important and integral part of conducting business at Embassy Corporation. One of the guiding principles is to take careful consideration to the environment in our everyday decision-making.

EMBASSY CORPORATION ENVIRONMENTAL POLICY GOALS

- Develop a project environmental action plan which commensurate with company standards and regulatory/client requirements.
- Minimize hazards to worker and public health.
- Maintain an effective reporting and communications system.
- Protect the environment from adverse effects of construction operations.
- Comply with all legislative and regulations of the environment.
- Provide education to participating personnel; enabling them to understand and share in the responsibility for monitoring and protecting the environment.
- Assess potential environmental risks.
- Evaluate and monitor environmental performance to applicable standards, work with industry, government, and other workers to maintain environmental awareness.
- Maintain an effective reporting system to upper management and supervisors.
- Embassy Corporation shall conduct a waste audit covering the waste that will be generated in the construction project. The audit shall also address the extent to which materials or products used consist of recycled or reused materials or products.
- The plan or a summary be posted at the construction site in a place where most of the workers will see it and;
- If a summary is posted, any worker who requests to look at the plan be allowed to do so O. Reg. 102/94, s. 23.

2.0 OUR POLICY RULINGS

General

1. Employees shall become familiar with applicable job-related environmental legislation and shall conduct Embassy Corporation business in an environmentally responsible manner.
2. No person shall discharge a contaminant into the natural environment and no person responsible for a source on contaminant shall permit a discharge into the natural environment in an amount, concentration, or level, in excess of that prescribed by the Regulations.
3. Every person who discharges a contaminant or is responsible for a contaminant that discharges into the natural environment, in an amount, concentration, or level in **excess** of that prescribed by the regulations, shall forthwith notify the Ministry of the Environment about the discharge.
4. Every person who discharges a contaminant into the natural environment that is **likely to cause** an adverse effect shall forthwith notify the Ministry.
5. The owner of the pollutant and the person having control of a pollutant that is spilled and that causes or is likely to cause adverse affects shall immediately do everything practicable to prevent, eliminate and improve these effects and to restore the natural environment.

3.0 OUR PURPOSE

The purpose of our environment plan is to:

- ✓ protect employee & public health and the environment;
- ✓ improve employee morale and participation;
- ✓ reduce operating costs;
- ✓ enhance company's image in the community; and
- ✓ reduce risk of criminal and civil liability.

4.0 ENVIRONMENTAL PROCEDURES

This environmental requirements manual is provided to you as an introduction to the rules and procedures required by each employee to implement and abide by when performing everyday duties.

It is the responsibility of all Embassy Corporation employees, contractors and sub-contractors to read, understand, comply with, and ensure everyone is trained on the rules and procedures set out in this manual.

The company reserves the right to terminate any employee for a single environmental or safety infraction, with or without prior notice.

DEFINITIONS

CONTAMINANT

Any solid, liquid, gas, odor, heat, sound, vibration or radiation resulting from human activities that may cause adverse effect on people, property or the natural environment.

DISCHARGE

Includes an addition, deposit, emission or leak.

ENVIRONMENT

Surroundings in which an organization operates including air, water, land, natural resources, flora, fauna, humans and their interactions. Surroundings extended from within the organization to the global system.

ENVIRONMENTAL AUDIT

The assessment of environmental performance against applicable laws, regulations, institutional policies, and operational procedures to provide evidence and assurance about all essential due diligence.

ENVIRONMENTAL IMPACT

Any change in the environment whether adverse or beneficial, wholly or partially resulting from an organization's activities, products, or services.

ENVIRONMENTAL PROGRAM

This is a strategy to attain environmental goals. Our program is designed to address:

- Fundamental environmental goals
- Environmental liabilities
- Compliance strategies, including environmental auditing, monitoring, record keeping, abatement and waste minimization initiatives

POLLUTANT

Any solid, liquid, gas and/or odor resulting directly or indirectly from activities that:

- Impair the quality of the natural environment for any use made of it
- Injure or damage property, plant or animal life
- Harm or materially discomfort any person
- Adversely affect the health or impair the safety of any person
- Render any property, plant or animal life unfit for use
- Cause the loss of enjoyment of the normal use of property; and/or
- Interfere with the normal conduct of business

A pollutant also includes any substance from which such solid, liquid or gas and/or odor is derived.

SPILL

A discharge of a pollutant made into the natural environment, which is the air, land or water of Ontario, from or out of a structure, vehicle or other container, that is abnormal in quantity in light of all the circumstances of the discharge

5.0 Environmental Due Diligence

1. Embassy Corporation shall design and implement and audit their own environmental programs to conserve resources, minimize waste production, comply with environmental legislation, and promote operational environmental due diligence including routine monitoring, emergency preparations and reporting.
2. Management personnel shall establish systems and contingency plans where necessary to protect the environment, and shall see that these systems and plans are effectively operated and maintained.
3. Employees of Embassy Corporation shall be trained to respond effectively to environmental occurrences and to report remedial actions to supervisory personnel and government authorities. This training and instruction shall be a local or departmental responsibility.
4. Significant environmental issues and environmental due diligence initiatives shall be reported by senior supervisors/management personnel to Environmental Health and Safety to promote internal communications and other appropriate actions.

Guidelines

Embassy Corporation is committed to preventing pollution by regularly identifying, assessing, managing, and reviewing operational and research activities that may harm the environment. Embassy Corporation expects environmentally responsible behavior from within its organization and from all employees. All employees have a duty to report situations of concern to their immediate supervisors.

The ***Environmental Protection Act*** and its regulations, and local municipal by-laws apply to Embassy Corporation daily operations may impact the environment via air emissions, chemical storage, fuel storage, vehicle usage, and hazardous waste, use of ozone-depleting substances, hazardous material spills and sewer discharges. The law requires that all employees conduct their business with due diligence (i.e., with all reasonable care being taken).

6.0 Environmental Offences

Under the ***Environmental Protection Act***, every person who is convicted of a contravention of the Act or regulations or who fails to comply with an order or requirement of an inspector or director or an order of the Minister of Environment is liable to a fine or imprisonment. Individual supervisors, managers and workers can be charged and found personally liable. Embassy Corporation can also be prosecuted. The owner of the pollutant may also be liable for compensation to a third party for loss or damage arising from the adverse effects of the pollutant, spill or contaminant.

Employees are secure from reprisals when they report environmental concerns.

ENVIRONMENTAL CHECKLIST

1. Appointment of an on-site designate
2. A list of Contaminant Products
3. A substitution for less hazardous substances
4. MSDS for all on-site products/health hazard information
5. Ensure all environmental licenses and permits have been arranged for
6. Storage and handling of all harmful on-site products
7. Response plan to on-site spill containment
8. Requirements for a spill containment kit
9. Response plan for an on-site spill
10. Notification/communication requirements
11. Emergency response plan
12. Preparation for an environmental inspection or audit

7.0 MINIMIZING WASTE

Minimizing waste is one of the first considerations in a successful environmental protection program. Waste Reduction Audits will be performed periodically at our construction project and the results submitted to Embassy Corporation senior management for review and implementation. This audit will identify recyclables that will be accumulated. (i.e. brick and concrete, unpainted drywall, wood, steel corrugated cardboard etc)

Based on the 3-R's waste reduction regulation 102/94, we have included waste audit, reduction and recycling forms with this policy to assist in your waste reduction plan.

The results from these waste audit work plan sheets will highlight areas where your reduction efforts will have the greatest impact.

8.0

MSDS - MATERIAL SAFETY DATA SHEETS

Material Safety Data Sheets must be present on-site for all controlled products. The MSDS sheet must be submitted before the controlled product is brought onto the site. These sheets must be kept current and readily accessible for review for any and all site personnel.

STORAGE AREAS

The Project Superintendent will approve storage area locations for bulk hazardous materials. Any storage areas, which contain hazardous materials, will not be located in Environmentally sensitive areas. All potentially hazardous products must be properly labeled and stored in designated safe and secure product storage areas which are protected from rain, wind, sun and unauthorized use. All products shall only be handled by persons who are trained and qualified in handling these products and shall be fully trained. (e.g. WHIMIS and Emergency Response Procedures)

FLAMMABLE LIQUIDS/OILS/PAINTS

Any flammable liquids, oils and glycols must be stored in a CSA approved container. All solvents and materials shall be stored in designated secure, ventilated areas away from the immediate work area. All contaminated or hazardous liquid wastes are to be stored in appropriate steel or plastic drums or tanks and sent for disposal in accordance with applicable federal and provincial legislation. All painting operations shall be carried out during calm weather periods (minimal wind) to minimize airborne paint particulate. Spilled paint or solvent shall be contained, cleaned up and disposed of in accordance with federal and provincial waste management. The Senior Superintendent must approve the storage location of all products such as solvents, thinners, urethanes etc., and shall not be left open; covers shall be placed/replaced to ensure proper seal.

Any spilled paint or solvent shall be contained, cleaned up and disposed of in accordance with federal and provincial waste management.

All glycol, fuel, sanitary and storm lines shall be properly drained prior to their abandonment, with the contents being contained and disposed of in accordance with applicable environmental legislation and regulations.

Any oily rags or rags contaminated with paint products will not be allowed to accumulate and they are to be stored in an approved self-closing metal container.

9.0 EXCAVATED MATERIAL MANAGEMENT

The Superintendent of the location and procedure for the storage or excavation of material requires prior approval. If the excavated material is contaminated, the following procedures will be implemented so as to restrict the movement of contaminated soil.

- Ensure all waste disposal operations are managed in a manner to minimize the waste materials to become loose and airborne.
- Ensure all workers involved are made aware of the potential consequences of such contamination.
- Notify immediate supervisor of soils of unusual odor or visual quality is compromised, so that an assessment of the relative degree of contamination through on-site monitoring or analytical testing can be made.
- Ensure that excavated soil that exceeds the threshold soil quality criteria for petroleum hydrocarbon/glycol and required remediation is sent to an appropriate remediation facility or approved off-site facility.
- Ensure the soil below the threshold soil quality criteria is re-used on-site or elsewhere at the site for backfill or other suitable purpose.
- Ensure soil is segregated, temporarily stockpiled and covered with tarps.
- Contaminated soil shall be classified as a register able or non-register able solid waste

Maintaining a record of soil disposals, including, as a minimum, the following:

- Client/generator
- Hauler
- Destination of material
- Type of material
- Number of loads

The site will be regularly audited to ensure the soil management plan is being followed. In the event that hazardous wastes are found during the course of the work, ensure the hazardous wastes are segregated and properly disposed of by qualified hazardous waste removal contractors and in accordance with applicable federal and provincial legislation. All persons involved with the hazardous waste removal program and any persons working in the vicinity of the hazardous waste working areas shall exercise caution and wear protective equipment and clothing as needed. Arrange for proper dust and particulate control measures to prevent the release of hazardous materials.

ESTABLISHING WORK ZONES

Work zones shall be established for work areas and resulting materials:

1. CONTAMINATION AREA

This is the area where contamination does and could occur. Bulk storage of hazardous excavated material will be stored in this area. Personnel entering this area are required to wear the required personal protective equipment.

2. DECONTAMINATION AREA

This area provides a transition zone between contaminated and clean areas of the site. The decontamination area is to be located directly outside the contaminated area. Any personnel and equipment leaving the contaminated area will be decontaminated in this zone, if required.

3. CONTAMINANT FREE AREA

This is a contaminant free area and should be a safe distance away from the other two areas. Other measurements may be required to deem this area free of contaminants such as signage, protective clothing for the personnel who enter the area, special employee training/education.

10.0 CONTAMINATED MATERIALS STORAGE AND DISPOSAL

- ✓ A list of potential or actual treatment and disposal facilities should be compiled in order to have a means to store or dispose of contaminated materials, petroleum products, and other construction related wastes. The Embassy Corporation will recycle those wastes, such as motor oil, where there is an established recycling program available. Wastes such as grease, or oily rags shall be disposed of in accordance with provincial requirements.
- ✓ All contaminated soils, absorbent materials, and other wastes shall be stored and disposed of by the Sub-Contractor in accordance with all applicable provincial and federal regulations.
- ✓ Only licensed carriers may be used to transport contaminated material from the site to a disposal facility.
- ✓ If necessary to temporarily store excavated soils on the site, these materials shall be placed on, and covered by, plastic sheeting, or placed in properly labeled ring-top 55-gallon drums and the storage area bermed to prevent and contain runoff.
- ✓ Any hazardous or contaminated material stored on Embassy Corporation property will be properly labeled in accordance with provincial and federal labeling requirements.

11.0 EQUIPMENT MAINTENANCE/STORAGE/FUELLING

Any vehicles/equipment will not be parked or stored, especially after regular working hours, in environmentally sensitive areas. Cleaning of construction equipment in locations where debris is prevented from gaining access to storm sewers or watercourses. Trim loads to trucks hauling material from the site before leaving the site in order that no spillage of loads occurs.

Establish a procedure and a plan for fuelling and vehicle or equipment maintenance. A contingency plan for the interception and rapid clean-up and disposal of spills and obtain approval of such plan prior to starting work from the site superintendent.

Maintenance and repair shall be done, whenever possible, the immediate work area. When repair activity must be conducted on-site, the following precautions MUST be followed:

1. Repair and maintain equipment in an area designated by construction superintendent, keeping in mind that such areas shall be a minimum of 30 meters from a watercourse.
2. The maintenance and repair area shall be located such that no surface runoff will flow through the area.
3. The Sub-Contractor shall equip the maintenance and repair areas with enclosed containers for the disposal of all refuse and non-hazardous waste resulting from the maintenance operation.
4. The Sub-Contractor shall equip the maintenance and repair areas with spill control kits for spills and hazardous materials

Petroleum products and allied petroleum products can be found in underground storage tank systems, aboveground storage tank systems and fuelling systems located on the construction site.

Precautions must be taken to prevent spillage during fuelling operations.

Note: The Sub-Contractor shall follow proper fuel storage practices, including, but not limited to the following:

- ✓ Fuel storage shall be at the work site only if approved by The Embassy Corporation.
- ✓ Proper signage at and adjacent to the fuel storage areas to state:
“Fuel Storage Area – No Smoking within 50 feet”

- ✓ A minimum of two 30-pound or four 20-pound fire extinguishers must be located and made readily available at all fuel storage locations. The extinguishers shall be located not less than 25 feet and not more than 75 feet from these locations.
- ✓ Tools and materials to stop the flow of leaking tanks and pipes shall be kept onsite. Such equipment may include, but not be limited to:
 - plugs of various sizes
 - 3M tank patches
 - a hammer
 - assorted sizes of metal screws with rubber washers
 - a screw driver
 - plastic tape

Also spill kits must be located at the fuel storage areas.

- ✓ Fuels, lubricants, waste oil, and any other regulated substances shall be stored in above ground tanks only.
- ✓ Storage tanks and containers must conform to all applicable industry codes (NFPA, UFC, CSA, etc.)
- ✓ All fixtures, hoses, nozzles and storage tanks shall be in good repair with no leaks.
- ✓ Vehicle maintenance wastes, including used oils and other fluids, shall be handled and managed by personnel trained in the procedures outlined in this plan.
- ✓ Refilling operations and storage tanks shall not be located within 30 meters of a waterway, sanitary or storm sewer, manhole or catch basin.
- ✓ Oil changes must be done so that the oil is drained into a containment pan located on a leak tight tarp.
- ✓ Any leak or spill of oil or fuel onto the ground must be reported immediately to the site Superintendent who will then take the appropriate action

12.0 EROSION AND SEDIMENT CONTROL

Proper erosion and sediment control measures shall be installed and maintained to minimize the loss of material to surface and subsurface drainage systems. Catch basins and manholes where potential for surface runoff exists will be protected by means of silt fencing and or straw bales. Surface runoffs will be directed to catchments basin. If applicable, the erosion on slopes will be addressed.

13.0 **DRAINAGE CONSIDERATIONS**

All water from dewatering operations shall be contained and discharged in a way that ensures that water quality and quantity objectives of the receiving storm or sanitary sewers systems are met. This may require the use of water treatment facilities or storm water management ponds.

Temporary drainage and pumping shall be provided, as necessary to keep excavations and site free from water. Utilize erosion and siltation controls as necessary. After ground and storm water in dewatering catchments basin has clarified and separated from solids and meets the solids and chemical contents of water criteria for direct discharge into the storm sewer system stated by the authorities having jurisdiction, the contractor may pump and discharge the water into the storm water system.

Water containing suspended materials will not be pumped into waterways, sewers or drainage systems.

All Environmental Laws for the disposal of effluent water containing solid and/or liquid contaminants will be complied with.

14.0 **OUR SPILL CONTINGENCY PLAN**

A spill contingency plan is designed to provide the best response with the shortest possible time to protect people, property and the environment. To carry out these objectives, the plan must include mechanisms for initiating and carrying out the required notifications, spill containment, clean-up and remedial actions. These measures will be implemented by Embassy Corporation as well as all the Sub-Contractors working on Embassy Corporation projects, unless otherwise directed by the Embassy Corporation.

Spills or discharges of pollutants or contaminants under the control of any personnel shall be reported immediately and documented accordingly.

If the spill contains noxious vapor, evacuate immediately and keep unnecessary people away. If it is safe to do so, contain the spill by surrounding it with earth, sand or an approved commercial absorbent; cover or protect any catch basins in the immediate area from receiving any spilled contaminants.

Reporting an incident of a spill should be determined if it is to cause or likely to cause any of the following effects:

- Impairment to the quality of the natural environment - air, water or land
- Injury or damage to property and animal life

- Harm or material discomfort
- Adverse health effects
- Impairment to safety Property, plant or animal like to become unfit for use
- Interference with normal conduct of business

Each reportable spill will be documented and submitted as required to the environmental regulatory agency. This report will include information on the cause of the spill and events leading up to it. The type and volume of the substance spilled will be noted. Details of the containment, clean up, disposal and restoration operations will also be provided.

If any of the spills is of a solid, contain it by using barriers and control dust and particulates by covering it with tarp.

All spills of equipment fluids, cleaning fluids, fuels or other hazardous wastes must be cleaned up immediately and all contaminated materials, including soils, must be disposed of in compliance with applicable laws and regulations.

SPILL CATEGORIZATION

1. **Minor Spill** - a spill that does not cause significant adverse effects, or public concerns and that the spiller can utilize his own resources available to him, undertake the necessary measures to control, contain and clean-up the substance spilled
2. **Moderate Spill** - a spill that causes or is likely to cause significant adverse effects in the immediate vicinity of the spill for which the resources provided may be required to effectively contain and clean-up the substance spilled
3. **Major Spill** - an incident in which oil or other hazardous substance of such magnitude and nature as to require additional resources to those available from the responsible party

All spills will be cleaned up in an environmentally acceptable manner such that the spill site is restored to its pre-spill condition, as reasonably expected. The clean-up requirement covers all spills of pollutants both reportable, and those exempt from reporting and those which are not abnormal in quantity or quality.

Under the ***Environmental Protection Act*** any spill of a pollutant is a spill. Of primary concern are those spills of pollutants, which are abnormal in quantity and quality. Reportable quantities for spills of hazardous and/or toxic substances vary widely. Therefore, there is no standard exemption. Therefore, if a spill of any quantity is detected, the site superintendent and/or Ministry of Environment must be notified to determine if formal notification is necessary.

15.0 **SPILL REMEDIATION**

The cleanup will include the following actions:

- Securing the total spill area
- Filling drainage paths
- Containment of the spill
- Securing the source of the spill
- Secure open drains
- Deploy booms
- Deploy absorbents which are commercially approved for spills
- Clean-up as appropriate - transfer spilled substances, soils/water, used absorbents to tanks or drums
- Disposal of recovered spilled substance and clean-up materials; this disposal will require adherence to all applicable laws
- Restoration of the site

ASSESSMENT OF THE SPILL

Information, which will be used during the assessment of the spill:

- Location
- Substance
- Quantity
- Total quantity spilled (assessment of any further spillage)
- Surface area involved
- Hazardous materials involved (MSDS)
- Potentially stopping leak or contain the spill
- Criteria for containing the spill
- Required materials or equipment
- Weather conditions while counter measures are underway

16.0 **NOTIFICATION AND INCIDENT REPORTING REQUIREMENTS**

The Spill Coordinator shall complete a Spill Report for each release of a hazardous substance spill, regardless of volume. The Spill Report Form must be submitted to the Embassy Corporation Representative within 24 hours of the occurrence.

The following information will be required upon the notification of the spill and shall be recorded on our Spill Report Form:

- Name, company, address and telephone number of the Project Superintendent, Spill Coordinator, Labour Safety Representative and the person who reported the spill.
- A legal description and specific location of spill with directions to the nearest community.
- Time and date of incident contained/released
- Time and date incident started/stopped
- The type and estimated volume of spilled material and the manufacturer's name

- The media in which the spill exists (e.g. – water, soil, surface)
- The topography and surface conditions of the spill site.
- Proximity of surface waters
- Weather conditions
- The cause of the spill
- Immediate containment and/or clean up actions taken
- Current status of cleanup actions.
- Any injuries or casualties
- Potential environmental impact

Follow-up written reports associated laboratory analysis, confirmatory field sampling and other documentation may also be required separately on a site specific basis as directed by the Embassy Corporation representative or Environmental Inspector. Documentation is the responsibility of the Sub-Contractor.

AGENCY NOTIFICATION:

The Contractor, in coordination with Embassy Corporation and the appropriate federal, provincial and local agencies must ensure that additional parties or agencies are properly notified. Additionally, the Sub-Contractor is responsible for ensuring that all cleanup activities required by a jurisdictional agency are satisfactorily met and provide documentation to the Embassy Corporation demonstrating this compliance.

NOTIFICATION CONTACTS:

A list of primary and secondary contacts will be provided in the event of any spill or endangerment of personnel.

Project Superintendent:	Name	_____
	Office No.	_____
	Mobile No.	_____

On-Site Spill Coordinator:	Name	_____
	Office No.	_____
	Mobile No.	_____

Embassy Representative: (Our Spills Co-coordinator)	Name	_____
	Office No.	_____
	Mobile No.	_____

Embassy Corporation:	Office No.	_____
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SAMPLE OF ENVIRONMENTAL SPILL REPORT

ENVIRONMENTAL SPILL REPORT	
Date of Report _____	Date of Incident _____
Project Name _____	Location _____
Name of District _____	
Name of Project Superintendent (please print name) _____	
Name of Company Responsible for Spill? _____	
Address _____	Phone no. _____
Contact Name _____	Position _____
Name of product/substance spilled/released: (refer to Material Safety Data Sheet) _____	
Location of spill: _____	
Total quantity involved: _____	Quantity spilled/released: _____
Time incident started/stopped: start _____ stop _____	
Weather conditions anticipated during clean up operations: _____	
Briefly describe what caused the spill or release. _____	

Briefly describe what was affected by the spill/release. (identify surface areas, where practical to do so) _____	

Briefly describe measures/actions taken to control spill/release. (include equipment, materials, etc.) _____	

Identify corrective measures/actions taken to complete all operations. (i.e. clean up, packaging, storing, disposal, etc.) _____	

Date and time of completion: _____	
Recommendation(s) to prevent reoccurrence. _____	

Was anyone injured? _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
If yes, has an Accident Incident Investigation Report been completed? _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
If yes, please attach a copy to this report.	
Who has been contacted? _____	
Senior Construction Manger _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
Safety/Environmental Manager _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
Joint Venture Executive Committee _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
Environmental Protection Agency _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
Other Agencies contacted _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
Name of On-Site Environmental Designate: _____	(Print) _____ (Signature) _____
Name of Safety/Environmental Manager: _____	(Print) _____ (Signature) _____

Note: Use reverse side as required.

17.0 EMERGENCY RESPONSE TO A SPILL EVENT

Immediately upon learning of any fuel, oil, hazardous material or other regulated substance spill, or upon learning of conditions that will lead to an imminent spill, the person discovering the situation shall:

1. Initiate actions to contain the fluid that has spilled or is about to spill, and initiate action to eliminate the source of the spill to the maximum extent possible.
2. Notify your crew foreman and/or the Spill Coordinator and provide them with the the following information:
 - a. Location and cause of the spill
 - b. the type of material that has spilled
 - c. Whether the spill has reached or is likely to reach any surface water.
3. Upon learning of the spill or a potential spill, the Spill Coordinator shall:
 - a) ensure no danger to personnel - Evacuate them from the spill scene.
 - b) assess the situation and determine the need for further action.
 - c) the Spill Coordinator shall notify the Embassy Representative and/or senior management of the Embassy Corporation of the event.
 - d) direct subsequent activities and/or further assign responsibilities to other personnel.
 - e) procedures regarding excavation and disposal of contaminated soil material from wetlands or near water bodies are to be followed.
4. Upon learning of the spill or a potential spill, Senior Embassy management shall:
 - assess the situation and call the provincial Spills Action Centre and provide notification and any other related information they request.

**ONTARIO'S SPILLS ACTION CENTER EMERGENCY PHONE NUMBER:
1-800-268-6060**

5. The spills coordinator shall begin organizing the containment and removal of the hazardous spill through the assistance of the local authorities and the Spills Action Centre Duty Officer.
6. The Embassy Representative or someone from Embassy senior management shall contact and notify the owner of the property.
7. Clean-up efforts shall be dictated by the requirements set out by the Federal, Provincial and / or Municipal authorities.

MOBILIZATION:

- ✓ The Spill Coordinator shall mobilize on-site personnel, equipment, and materials for containment and/or cleanup commensurate with the extent of the spill.
- ✓ If the Spill Coordinator determines that a spill beyond scope of on-site equipment and personnel, the Spill Coordinator shall immediately notify the Constructor's superintendent that an Emergency Response Contractor is needed to contain and/or clean up the spill.
- ✓ The Spill Coordinator shall assist the Emergency Response Contractor and monitor containment procedures to ensure that the actions are consistent with the requirements of this Spill Plan.

18.0

ROLES AND RESPONSIBILITIES

Spill Coordinator

The project superintendent or crew foreman shall be designated as the Spill Coordinator by the Subcontractor, subject to the approval by the Embassy Corporation.

The Spill Coordinator shall ensure that the Embassy Representative is notified immediately, and may assist in the response action as dictated by the Embassy Corporation.

For all construction related spills, the following will apply:

- ✓ The Spill Coordinator shall report all spills to the Embassy Representative immediately.
- ✓ The Spill Coordinator (under Embassy oversight), shall report the spill to the appropriate federal, provincial, state and local agencies as soon as possible.
- ✓ The Spill Coordinator shall mobilize on-site personnel, equipment, and materials for containment and/or cleanup commensurate with the extent of the spill.
- ✓ The Spill Coordinator shall assist the Emergency Response Contractor (the company assigned to clean up the spill) and monitor containment procedures to ensure that the actions are consistent with the requirements of this Spill Plan.
- ✓ The Spills Coordinator and/or Embassy Representative, in consultation with appropriate agencies, shall determine when it is necessary to evacuate spill sites to safeguard human health.

- ✓ The Spills Coordinator (under Embassy oversight), shall coordinate with the appropriate agencies the need to contact additional parties or agencies.
- ✓ The Spills Coordinator is responsible for completing a Spill Report Form (sample included on next page), within 24 hours of the occurrence of a spill, regardless of size of spill.

Environmental Inspector:

The environmental inspector will be a competent person, assigned to monitor the Sub Contractor's compliance with the provisions of this Spill Plan.

Authorized Personnel:

- ✓ Authorized personnel are representatives of the Sub-Contractor who are designated to handle fuel, lubricants or other regulated substances.
- ✓ Authorized personnel must be familiar with the requirements of the Spill Plan and the consequences of non-compliance.

Construction Superintendent:

The Sub-Contractor's Construction Superintendent or representative must notify the Embassy Representative and the Environmental Inspector immediately of any spill of a petroleum product or hazardous liquid, regardless of its volume.

Construction Personnel:

- ✓ Construction Personnel are representatives of the Sub-Contractor involved with the construction project.
- ✓ Construction Personnel shall notify the crew foreman or Spill Coordinator immediately of any spill of a petroleum product or hazardous liquid, regardless of its volume.

Embassy Representative:

The Embassy Corporation Representative shall oversee the Spill Coordinator to ensure that appropriate agency notifications are made, spill resources are allocated, and cleanup is accomplished in accordance with applicable agency requirements.

19.0 EQUIPMENT AVAILABILITY, USE AND POSITIONING

All subcontractors, shall train all employees who handle fuels and other regulated substances, on how to prevent spills and to quickly and effectively contain and clean spills that may occur in accordance to applicable regulations. The following equipment should be made available on site in case of a spill:

- ✓ each construction crew must have adequate absorbent materials on hand, to enable the rapid cleanup response desirable for any spill which may occur.
- ✓ The Sub-Contractor must maintain spill kits containing a sufficient quantity of absorbent and barrier materials to adequately contain and recover foreseeable spills. These spill kits may include, but not limited to:
 - absorbent pads
 - straw bales
 - absorbent clay
 - sawdust
 - floor drying agents
 - spill containment barriers such as tiger tail dams
 - plastic sheeting
 - skimmer pumps
 - holding tanks / reservoirs
 - spill pans

This equipment shall be located near fuel storage areas and other locations as necessary to be readily available to control foreseeable spills.

- ✓ Suitable plastic lining materials shall be available for placement below and on top of temporarily-stored contaminated soils and materials.
- ✓ The Spill Coordinator shall make known to Authorized Personnel, Construction Personnel, the Environmental Inspector, and the Embassy Corporation Representative, the locations of spill control equipment and materials, and have them readily accessible during construction activity.
- ✓ Construction equipment shall be removed from wetlands and parked a minimum of 100 feet away from streams, wetlands, ditches, and other water bodies at the end of each workday.
- ✓ In large wetlands where no upland site is available for refueling, auxiliary fuel tanks on construction equipment are recommended.

- ✓ All fuel nozzles shall be equipped with functional automatic shutoffs and over-flow alarms.
- ✓ Fuel trucks transporting fuel to on-site construction equipment shall travel only on approved access roads.

EQUIPMENT SUPERVISION AND INSPECTION

- ✓ The Sub-Contractor shall perform a pre-construction inspection and test of all equipment to ensure that it is in good repair.
- ✓ During construction, the Sub-Contractor shall regularly inspect hoses, pipes, valves, and tanks to ensure equipment is free of leaks. Any equipment found to be leaking or in need of repair, will be immediately removed from service by the Sub-Contractor and repaired, prior to re-use on our project.

20.0 SPILL CONTROL - Upland areas

- ✓ If a spill occurs during refueling operations, STOP the refueling operation until the spill can be controlled and the situation is corrected.
- ✓ The source of the spill must be identified and contained immediately.
- ✓ For large spills on land, the spill must be contained and pumped immediately into tank trucks. The Contractor or, if necessary, an Emergency Response Contractor, shall excavate the contaminated soil.
- ✓ The spilled material and the contaminated soil must be treated and/or disposed of in accordance with all applicable federal, provincial, and local agency requirements.
- ✓ Smaller spills on land shall be cleaned up with absorbent materials. Contaminated soil or other materials associated with these releases shall also be collected and disposed of in accordance with applicable regulations.
- ✓ Flowing spills must be contained and/or absorbed before reaching surface waters and wetlands.
- ✓ Absorbent materials shall be placed over spills to minimize spreading and to reduce its penetration into the soil.

- ✓ The Spill Coordinator and/or Embassy Representative, in consultation with appropriate agencies, determine when spill sites will be evacuated as necessary to safeguard human health. Evacuation parameters shall include consideration for the potential of fire, explosion, and hazardous gases.

SPILL CONTROL - wetlands and water bodies

In addition to the above measures, the following conditions shall apply if a spill occurs near or into a stream, wetland or other water body, regardless of size:

- ✓ If a spill occurs during refueling operations, STOP the refueling operation until the spill can be controlled and the situation is corrected.
- ✓ For spills into streams, lakes or other water bodies containing standing or flowing water, regardless of size, the Sub-Contractor Representative must apprise Varcon of the incident and notify the appropriate authorities immediately.

21.0 ASBESTOS AND OTHER DESIGNATED SUBSTANCES

Asbestos containing materials is present throughout many areas of the construction site. All construction that requires demolition, access into ceiling spaces or work performed on mechanical systems shall be carefully monitored and assessed prior to the commencement of work.

A schedule and work plan detailing all asbestos abatement work will be required from the Contractor performing the work. Care must be taken to ensure exposure to asbestos is minimal or eliminated where possible. If friable material is discovered during any work, the workers will stop operations immediately.

If any designated substances are encountered, the Contractor will immediately stop further disturbance and notify proper authorities.

Measure will be set in motion to:

- Investigate the type, quantity and identification of the suspected designated substance.
- The hiring of a qualified contractor to remove identified designated substance.
- Medical screening of any worker who may have come in contact with the designated substance.
- Establishment of separation measures to control exposure to workers.

22.0 **DUST AND DEBRIS CONTROL**

Excessive dust and debris from construction activities creates a serious hazard for the operation of all regular activities on the construction site. During progress of work, provide measures to control dust and debris at all times.

Waste, loose material and debris, capable of causing damage should be contained at all times. Cover or water sprinkling of dry materials to prevent blowing dust and debris, temporary enclosures (tarps etc) or other suitable methods to prevent dust and debris arising and scattering into the air, should be implemented as required.

Excavated materials and exposed, unprotected cut faces shall be managed in a manner to minimize dust levels. Do not use water when it may create hazardous or objectionable conditions such as icing, flooding, pollution and ponding. The contractor responsible shall clean up any debris ending up outside the site.

Maintain sufficient water, watering equipment and personnel on site at all times to control dust. This prevents blowing of the dust on and from the site, from paved and unpaved temporary roads and excavated areas by wetting. Securely cover excavated and demolition materials being removed from the site and all fill materials being delivered to the site from becoming airborne of dust and debris.

23.0 **NOISE REDUCTION CONTROL MEASURES**

These precautions and measures consist of, but are not limited to the following:

- Efficient intake and exhaust silences on compressed air equipment
- Efficient intake and exhaust mufflers on internal combustion engines

The site superintendent will monitor the site for excessive noise and take necessary actions to control to a reasonable level wherever possible.

METHODS OF NOISE MEASUREMENT

Two types of hearing measurement can be performed – area and personal.

- Area Noise Measurements:
This measurement is taken in a specific work area. It is generally used to determine whether more detailed evaluations involving personal noise measurement is necessary.

- Personal Noise Measurements:

This involves a small device called a dosimeter. Workers can wear the device to determine their average noise exposure over a whole shift. Usually worn around the waist, the dosimeter has a microphone that is placed as close to the worker's ear as possible.

Such noise evaluations must be done by a knowledgeable person trained and experienced in conducting noise surveys.

Any piece of equipment that generates greater than 85 dBA shall have a caution label applied indicating the dBA level it generates, applied to it. **Any worker exposed to noise levels in excess of 90 dBA should wear hearing protection.**

The chart to the right (table 5) indicates some types of construction equipment with their corresponding levels of noise. In some cases our workers may be working near such equipment and will need to recognize the risks and take appropriate protection measures.

Also additional measures may be implemented to reduce the noise affects to the environment such as:

- noise dampening barriers
- improved muffler noise reducers
- other engineered methods to reduce noise levels.

Table 5

TYPICAL NOISE LEVEL MEASUREMENTS FOR CONSTRUCTION	
* EQUIPMENT	NOISE LEVEL (dBA) AT OPERATOR'S POSITION
Cranes	78 – 103
Backhoes	85 – 104
Loaders	77 – 106
Dozers	86 – 106
Scrapers	97 – 112
Trenchers	95 – 99
+ Pile drivers	119 – 125
Compactors	90 – 112
Grinders	106 – 110
Chainsaws	100 – 115
Concrete saw	97 – 103
Sand blasting nozzle	111 – 117
Jackhammers	100 – 115
Compressors	85 – 104
* Generally, newer equipment is quieter than older equipment. (For noise levels of specific equipment, contact the Construction Safety Association of Ontario.)	
+ Pile drivers and explosive-actuated tools generate intermittent or "impulse" sound.	