Kentucky Public Service Commission

2023-00276

Kenergy General Rate Application

AG Data Request Item 25(i) – Vegetation Management Bids Received

ASPLUNDH

ASPLUNDH TREE EXPERT, LLC.
200 Two Oaks Drive, Nicholasville, KY. 40356
Phone: 859-305-6573 - Fax: 859-305-6604

October 13, 2021

Re: 2022 RFP Vegetation Management

Dear Mr. Hoyt,

Thank you for the opportunity to participate in Kenergy's Vegetation Management Proposals. As a long-term service provider to utilities across Kentucky and North America, Asplundh is well prepared to provide complete vegetation management services to Kenergy.

We do not have any exceptions for the RFP request we received from you. We would like to, if awarded reserve the right to discuss possible exception to the contract.

We look forward to working with Kenergy in the future. Should you have any questions, please do not hesitate to contact me at 859-304-3700 for my Cell or 859-305-6573 at the office.

Sincerely,

Bobby King
Vice President
Asplundh Tree Expert, LLC
bobbyking@asplundh.com

Vegetation Management

Proposal 10/14/21

Vegetation Management

Request for Proposal

May 10, 2021

Section I: Overview

1. Company Overview

Kenergy Corp. (Kenergy), a member-owned electric distribution cooperative, serves in excess of 58,000 households, commercial enterprises and industries in all or portions of 14 western Kentucky counties. They include Breckinridge, Caldwell, Crittenden, Daviess, Hancock, Henderson, Hopkins, Livingston, Lyon, McLean, Muhlenberg, Ohio, Union and Webster.

Kenergy Service Area

2. Purpose

Kenergy is issuing this Request for Proposals (RFP) to procure **one or more** qualified Independent Contractor(s) (Contractor) to perform vegetation management control activities including line clearance and herbicide application on Kenergy's electric distribution system for 2022.

Kenergy is seeking **one or more** Contractor(s) committed to controlling total cost while maintaining a high-performance focus. This relationship will focus on delivering the highest total value in the following areas: safety, quality, productivity, member satisfaction, cost effectiveness and adherence to schedule.

Kenergy will accept proposals for line clearance only, herbicide application only or both activities.

Section II: Technical Requirements

1. Scope of Work

The scope of work includes performing the following vegetation management activities on Kenergy's electric distribution facilities.

A. Line Clearance

i. Routine Circuit Maintenance

Vegetation management control activities performed on an entire circuit, including all primary, secondary, neutral, service line conductors and associated overhead electrical facilities using the below specifications. Work should also include clearing of rights-of-way floors (i.e. mowing, stubble spraying, etc.).

Tree Pruning: Contractor is responsible to obtain the following minimum tree and conductor clearances. ***Contractor will be required to remove limbs back to the previous cut. All clearances are minimum distances. Proper pruning techniques may require greater clearances.***

- Primary: All multi-phase & single-phase conductors:
  ***** All pine trees shall be conductor to sky clearance*****

- Primary: All multi-phase conductors:
  - 20 feet overhead clearance
  - 20 feet side clearance (40 feet total)
  - 14 feet under phase clearance

- Primary: All single-phase conductors:
  - 20 feet overhead
  - 10 feet side clearance (20 feet total)
  - 14 feet under phase clearance

- Secondary: All open wire conductors:
  - 10 feet overhead
  - 10 feet of side clearance (20 feet total)
  - 10 feet under phase clearance

- Service Line: All service line conductors:
  - All vegetation conditions that pose an immediate safety and/or reliability threat shall be eliminated

Strategic Tree Removal: Contractor is responsible to remove all undesirable trees and brush that are not suitable for herbicide application. This includes all trees located within 10 feet of either side of the outside phase.

Contractor must obtain signed permission from members for removals and submit to Kenergy the names and addresses for all member refusals associated with tree removals. All trees removed must be stump treated with appropriate herbicide application. The names and address of all members that refuse stump treatment must be submitted to Kenergy.

Herbicide Application: All undesirable trees and brush less than 10 feet in height that are located within 20 feet of either side of the multi-phase pole centerline and within 10 feet of either side of the single-phase pole centerline must be treated with an appropriate herbicide, using application techniques and chemical formulas approved by Kenergy.

Hazardous Tree Removal: Contractor is responsible to identify and remove all hazardous trees that pose a high degree of reliability risk to single-phase and multi-phase conductors. A hazardous tree will be defined as a large mature tree that poses imminent risk to the conductors. Contractor shall report the locations, number, and tree type of all hazardous tree removals to Kenergy.

Circuit single phase, multi-phase and total mileage identified on Exhibit 1 is correct to the best of Kenergy's knowledge. The Contractor is solely responsible to verify mileage during bid preparation and pricing and notify Kenergy of any changes to the project mileage within the returned RFP.

ii. Service Orders and Work Orders

Vegetation management control activities performed on a specific portion of a circuit identified by Kenergy through a Kenergy generated Service Order or Work Order.

The following specifications shall be used when clearing vegetation for proposed line extensions. ***All clearances are minimum distances. Proper pruning techniques may require greater clearances.***

- Primary: All multi-phase conductors:
  - 20 feet side clearance (40 feet total)
  - From centerline, ground to sky
- Primary: All single-phase conductors:
  - 10 feet side clearance (20 feet total)
  - From centerline, ground to sky
- Secondary: All bundled conductors (triplex or quadraplex):
  - 6-foot radius clearance

Construction & Access Requirements: Where appropriate, Contractor is responsible to clear a path along proposed line route for ingress, egress and safe working conditions for Kenergy Personnel and equipment. Path shall be clear of downed vegetation and any undergrowth.

Stump Requirements: Cut trees at ground level, leaving no stumps above ground.

Hazardous Tree Removal: Contractor is to remove all hazardous trees that pose a high degree of reliability risk to single-phase, multi-phase, and service conductors. A hazardous tree will be defined as a large mature tree that poses imminent risk to the conductors.

Contractor is solely accountable for the following activities:

- Member Notification: Contractor must consistently maintain a minimum of two weeks advanced member notification of field crew execution. Contractor is to supply an appropriate number of pre-work planners to conduct this notification.

- Pre-Work Planning: Contractor must utilize a pre-work planner(s) to assess and plan work scope a minimum of two weeks in advance of field crew execution. Contractor is responsible to manage all member refusals and file a written notification to Kenergy of all cases. Kenergy will work with Contractor pre-work planner to optimize the use of Kenergy's Trade-A-Tree program. Contractor will be responsible to provide a list to Kenergy of hazardous tree removals.

- Quality Assurance: Contractor must complete all quality assurance activities including written certification of quality assurance per circuit. Kenergy will conduct quality control inspections and issue a quality deficiency notice, as appropriate, on circuit miles completed and submitted by the Contractor within two weeks. Contractor must complete all quality control rework identified by Kenergy within one week of the notice

B. Herbicide Application

Herbicide Application – Vegetation management control activities involving foliar application to Kenergy's rights of way and bare ground application to Kenergy's substations and lots. Foliar application is performed in the year following line clearance. Bare ground application is performed every year.

Contractor is solely accountable for the following activities:

- Contractor will achieve a 95% kill for all foliar application and 100% kill for bare ground application.

- Kenergy must approve, in advance, all chemical formulas used for foliar and bare ground application.

- Kenergy must approve, in advance, all application techniques used for foliar and bare ground application.

- Member Notification: Contractor must consistently maintain a minimum of two weeks advanced member notification of field crew execution. Contractor is to supply an appropriate number of pre-work planners to conduct this notification.

- Pre-Work Planning: Contractor must utilize a pre-work planner(s) to assess and plan work scope a minimum of two weeks in advance of field crew execution. Contractor is responsible to manage all member refusals and file a written notification to Kenergy of all cases.

- Quality Assurance: Contractor must complete all quality assurance activities including written certification of quality assurance per circuit. Kenergy will conduct quality control inspections and issue a quality deficiency notice, as appropriate, on work completed and submitted by the Contractor within two weeks. Contractor must complete all quality control rework identified by Kenergy within one week of the notice

2. Proper Pruning Techniques

Directional pruning techniques are used on Kenergy's system, where appropriate. Pruning activities are based on accepted arboricultural standards, including ANSI A300 – Tree, Shrub, and Other Woody Plant Maintenance – Standard Practices (Pruning), International Society of Arboriculture Best Management Practices, Utility Pruning of Trees – Special Companion Publication to the ANSI A300 Standard and Pruning Trees Near Electric Utility Lines, A Field Pocket Guide for Qualified Line-Clearance Tree Workers by Dr. Alex Shigo.

3. Schedule

For line clearance work, the successful Contractor(s) must initiate personnel and equipment mobilization on the Kenergy system no later than January 11, 2022. The entire scope of work must pass final Kenergy quality control no later than December 31st of each year.

For herbicide, the successful Contractor(s) must initiate personnel and equipment mobilization on the Kenergy system no later than April 5, 2022. The entire scope of work must pass final Kenergy quality control no later than September 30 of each year.

4. Reporting

Contractor(s) will maintain and submit to Kenergy weekly timesheets that track labor and equipment utilization that addresses the scope of work. A copy of each crew

timesheet will also be submitted with each invoice. In addition, the following minimum circuit work summary details will be included:

- # of cuts and trims
- # of strategic removals
- # of hazardous tree removals
- # of spans and ft brush (skytrim)
- Equipment down time status
- Herbicide: # of acres, gallons used and locations applied

Kenergy reserves the right to modify reporting requirements by adding or deleting items.

5. *Invoicing*

Contractor shall invoice Kenergy monthly, no later than the 5th calendar day of each month, for all work completed during the previous month.

6. *Sub-Contractors*

List any sub-contractors that are included as a part of your RFP response.

Sub-Contractor	Role
N/A	

7. *Trade Classification and Union Affiliation*

Please list trade classifications and union affiliations for your or your sub-contractor employees in the table provided below.

Trade Classification	Union Affiliation (if none, so state)
N/A	

8. Communication

The following modes and instances of communication will be used for the duration of work:

A. Contractor shall ensure that all crews and General Foremen have immediate telephone communications with Kenergy's Control Center. Kenergy will provide the proper telephone numbers.

B. Contractor shall e-mail to Kenergy the specific crew locations each Monday by 7:00 AM (CST). Additionally, Contractor shall e-mail Kenergy the specific crew locations each time crews change locations from one circuit to another. Also, Contractor shall notify Kenergy when crews will be working non standard work days or hours.

C. Contractor shall immediately notify Kenergy by telephone of any safety violation or incident and provide a written follow-up report within 48 hours of the occurrence detailing the event, the root cause of the event and the steps the Contractor will take in the future to prevent a reoccurrence. Contractor shall develop a Report Form, approved by Kenergy, to be used for this purpose.

D. Contractor shall immediately notify Kenergy of any instances in which a member issue has a likelihood of being elevated in status with Kenergy

E. Periodic project update meetings will be held between Kenergy and Contractor. Such meetings will be held on an as-needed basis, but will be no less frequent than every eight (8) weeks.

9. Resource Availability and Response Time

Kenergy requires Contractor to have all system resources available 24/7 during the contract term for any emergency restoration work that may emerge on the Kenergy system. Contractor cannot at any time remove these personnel and/or equipment resources without prior approval from Kenergy. Crew(s) will be required to report to the designated Kenergy work location within 1 hour of notification.

10. Work Time

Normal working days will be Monday through Saturday. Contractor must coordinate their standard working schedule with Kenergy.

11. Debris Disposal

The disposal and associated cost will be the full responsibility of Contractor and will be performed in accordance with all local, state and federal regulations. Kenergy will work with Contractor in identifying debris disposal opportunities.

12. Contractor Safety and Environmental Rules

Kenergy's goal is to be a leader in safety and environmental stewardship. Contractor is expected to be knowledgeable of and adhere to all federal, state, local and Contractor company specific rules and regulations pertaining to safety and the environment. **A complete bid submission must include responses to and required attachments as found in Exhibit 1 – Safety Information.**

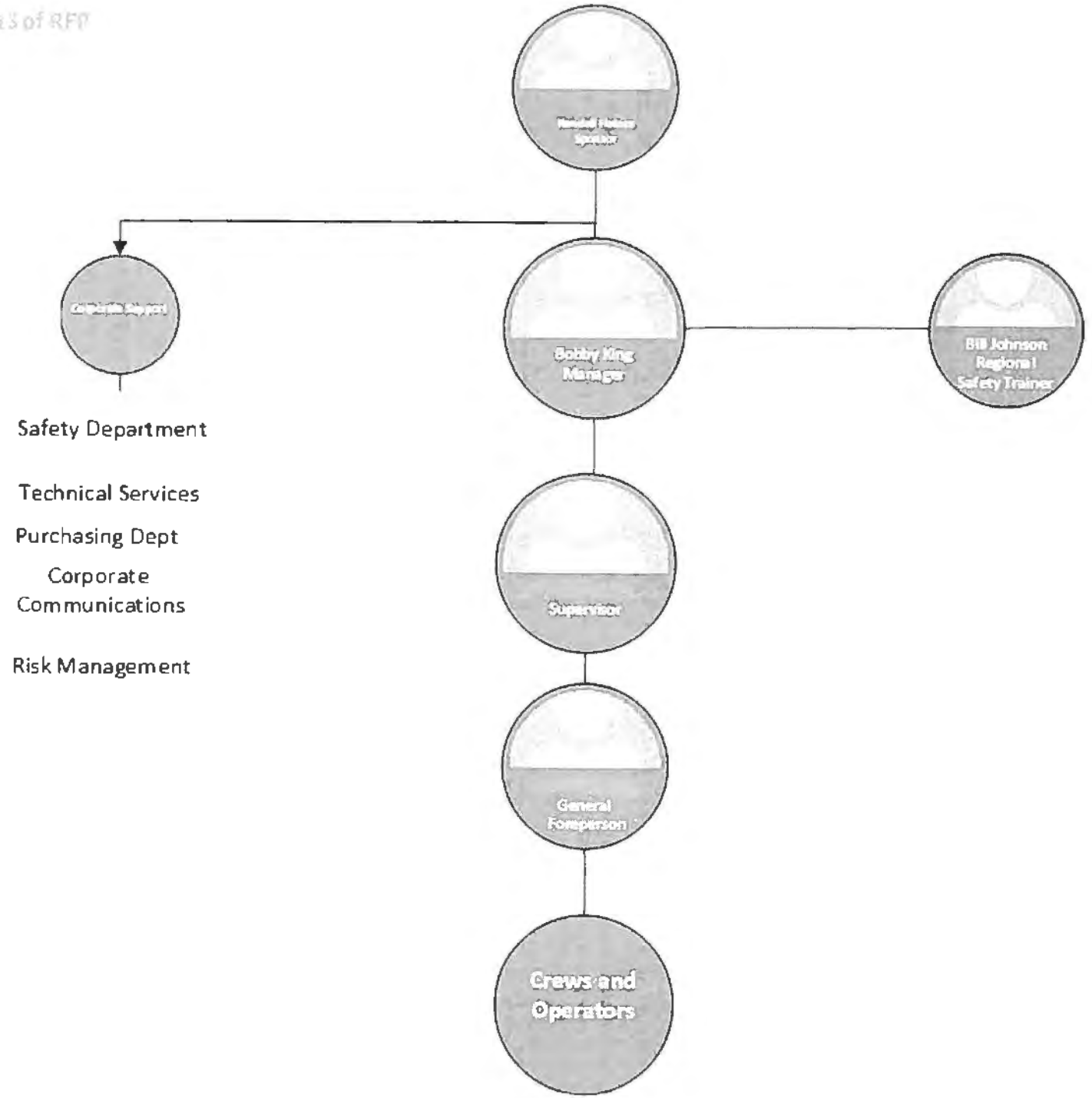
13. Contractor Proposed Organization Structure

Provide an organization chart describing your proposed company structure to support this RFP response. Include at a minimum title, reporting relationship and number of Full Time Equivalents (FTEs).

14. Contractor Mobilization Plan

Provide a mobilization plan outline that includes key milestones and associated timeframes to support the January 11, 2022 deadline for project mobilization and initiation. For example, describe how you plan to hire and retain qualified employees to fulfill your obligations within this project.

#13 of RFP



Safety Department

Technical Services

Purchasing Dept

Corporate
Communications

Risk Management

ASPLUNDH

About Asplundh Quality Management

Our primary quality objectives are to:

1) Consistently meet or exceed our standards and commitments.
2) Consistently meet or exceed our customer' expectations
3) Perform our work "right the first time" / Eliminate Defects or Rework.
4) Monitor our performance against these objectives and continually improve.

Asplundh Quality Principles

- Meeting or Exceeding Customer Expectations
- Leadership – Achieve Safety, Customer Satisfaction, Operations Efficiency and Effectiveness, and Financial Results Through Others
    - Establish a Vision
    - Establish Measures Goals and Objectives
    - Implement Plan, Roadmap, or Playbook
    - Enlist The Help Of Others
    - Recognize and Reinforce Behaviors and Results
- Involvement of people
    - Employees are our greatest asset and key to our success
    - Employees closest to the work know how to improve it
    - Employees want to achieve and be successful in performing challenging work and be respected, recognized, and rewarded for it.
- Process Approach –Activities are managed as a process with inputs>actions>outputs/results/deliverables and expectations for output quality
- Operational Systems Approach – We manage all interrelated processes in an integrated fashion as a system; We strive for Safe Production

- Continual improvement
    - We have a closed loop management system of: Plan – Do – Check - Act
- Factual and risk managed approach to decision making
    - We track and trend Key Performance Indicators and Operational Process Controls
- Manage Quality of supplier and customer process inputs

Our Quality Management System complements:

- Additional Regional Quality Policies
- Project Specific Quality Plans
    - Identifies additional Policy and Specifications Necessary

- Tailored for a Program or Project's specific needs.
- Regional and Client Manuals and Procedures
  - Further defines the specific program or project quality system
- Program or Project Facility Records, Standards, Plans, and Drawings
  - Further defines Services to be Performed
- Quality Records
  - Work records provide documentation on conformity and acceptance

Quality Management System

Our Quality Management System elements include:

1) **Quality Policy and Leadership**

   a. Management is responsible for creating the environment for Quality; commitment to quality starts with the senior management team.

   b. Management sets Quality Policy and provides adequate resources, key personnel, infrastructure and equipment to implement our Quality Management System.

   c. Management has a designated accountable quality representative who reports on the project quality performance on a regular basis, making recommendations for improvement opportunities, as needed.

   d. Each team member in the organization is responsible to ensure that our services meet or exceed Asplundh requirements and our customer commitments.

   e. The Asplundh Quality Management System is reviewed periodically by senior management for continual improvement opportunities.

2) **Quality Management System**

   a. This QMS provides the framework (organizational structure, procedures, processes and resources) for consistent repeatable performance and continual improvement.

3) **Organizational Structure**

   a. Generic Asplundh Organizational Structure

      - CEO
      - President
      - Sponsor/Corp VP
      - Regional VP/Manager
      - Supervisors / RSS
      - General Foreperson (GF's)
      - Foreperson/Crew Leader
      - Crew Members

   b. Our Project Organizational Structure will be tailored to the Program need.

4) Responsibilities

a. CEO and President

i. Responsible for establishing Quality Vision and Values and establishing the Quality Management System.

b. Sponsor/Corp VP

i. With the CEO and President, responsible for creating the environment for Quality

ii. Responsible for ensuring Regional VP/Manager understand the system, implement it, and validate that the quality results meet or exceed, Asplundh corporate expectations, governmental / regulatory expectations, and the customer expectations

c. Regional VP/Manager

i. Single point accountability for quality performance of our client program or project

ii. Leads team of Supervisors / RSS and General Foreperson (GF's) and Regional Support Team in the delivery of services.

d. General Foreperson

i. Responsible for Pre-Work Review of Job Instructions and Standards and proper delegation of work to crews with resources and controls necessary for Safe Production.

ii. Responsible for coaching and managing Foreman Performance.

iii. Responsible for supporting the foreman in improving process and removing barriers to safety and productivity

iv. Measure, Recognize and Reinforce Behaviors and Results

e. Foreperson

i. Responsible for crew performance and full-time site supervision.

ii. Responsible for Site Public Relations

iii. Responsible to complete job package according to standards and Asplundh expectations

iv. Responsible to record as-performed information and job resource reporting.

5) Resources

a. Regional Personnel required to deliver quality VM Services are identified in our generic organizational structure. Any additional unique project needs will be identified during project development phase and mobilized consistently with project mobilization practices.

6) **Processes**

   a. Human Resources Management - Personnel, Training, and Qualifications
   b. Environmental Health and Safety Management Process
   c. Fleet & Equipment Management
   d. Supply Chain Materials Management
   e. Subcontractor Management
   f. Customer Satisfaction, Notification, and Public Relations
   g. Work Management – Scope, Cost, Production, and Schedule Control
   h. Line Clearance & Reliability
   i. Job Documentation
   j. Financial Management and Controls
      i. Timekeeping, Expense, Pcard, and Fuel Card Reporting and Accounting
      ii. Equipment Vehicle Utilization and Accounting
      iii. Subcontractor Services Utilization and Accounting
      iv. Materials Utilization and Accounting
      v. Invoicing & Payment
   k. IT Data Management

7) **Customer Satisfaction- Standards, Audit, Acceptance**

   a. Contract, Standards, Specifications, Audit Plan and Acceptance Process is identified at Program engagement mobilization
   b. Customers Requirements are understood by the project team
   c. Quality is monitored for continual improvement.

8) **Continuous Improvement**

   a. Closed loop management system of: Plan – Do – Check - Act
   b. Quality Measurement areas include:
      i. Safety - Incident, Frequency (LWDC) and Severity Rates per 200,000 manhours,
      ii. Loss Cost per Hour and Vehicle Accidents per 100 employees;
      iii. Quality Inspections - Defects per 100 inspection points;
      iv. Customer Satisfaction - Survey Results from Utility and Escalated Customer Complaints;
      v. On Time Performance vs. Schedule;
      vi. Innovation - New Ideas Proposed/Implemented.

9) QMS Maintenance

a. Internal Quality Performance Reviews occur internally on a weekly basis when GF's review Foreperson and Crew Performance

b. Client/Asplundh Quality Performance Reviews occur on a Monthly basis with our Key Performance Indicator Review Meetings

10) Personnel Skills, Qualifications, and Training

a. Training

i. Asplundh Vegetation Management line clearance crews receive Asplundh Line Clearance Worker Trained and are qualified as competent Line Clearance Tree Trimmers and Line Clearance Tree Trimmers Trainees as outlined in OSHA CFR 1910.269.

ii. Program or Project Orientation - Program and project personnel receive Asplundh Tree Expert Co. employee orientation, safety orientation training, project overview, and instruction on client facilities and operational practices.

iii. New worker qualifications are audited by their foreperson and often our RSS Regional Safety Supervisor.

b. Worker Qualification Records are tracked and maintained as documented evidence of competence

11) Craftsmanship/Quality Accountability

a. Where traceability is required, on a project specific process basis, records of the products used, product source, or installation crew and installation tests are maintained.

12) Document Control

a. Critical Project Documents are assigned an "owner" and the most current revision of the controlled document are accessible to the project team as necessary.

13) Design Control

a. Customer Design and Operational Standards have an "owner" and the most current revision of the controlled document are accessible to the project team as necessary.

14) Procurement and Customer Supplied Material Quality

a. Evaluation, selection, and monitoring of suppliers and subcontractors is effective in ensuring procured product or services meet or exceed Asplundh requirements and our customer commitments.

b. Material Receipting and Coordination – On a project specific basis we develop an operations specific integrated material management process to assure that proper customer-supplied materials are available, handled correctly, and staged for efficient production.

15) Field Services Construction and Maintenance Control

a. Design and Construction Understanding - Our GF's and Forpersons typically perform a pre-construction walkdown of larger jobs to ensure that site prerequisites have been satisfied, the job package is understood, the work area is accessible, and the job can be performed without obstacles to productivity.

b. Construction and Maintenance processes and methods are established to monitor, measure and analyze field construction and maintenance processes.

16) Inspection and Testing

a. Ensures surveillance and testing controls are implemented at critical process points to monitor and measure conformance to standards and process effectiveness.

b. Quality Control – Reviewing Deliverables

Quality Assurance Checklists include:

- General Foreperson's Production Report
- File Documentation Audit Checklist
- Safety JHA Hazards Checklist
- Safety JBO Audit Checklist
- Employee Worker Qualifications Checklist
- Equipment Condition Checklist
- Vehicle Condition Checklist
- Lift Truck Inspection Checklist
- Shop Inspection Checklist
- Monthly Training Checklist

17) Quality Audits and Records

a. Job Behavior Observation and Audit Program - Periodic meetings with utility personnel to assure productive operations, and strategizing ways to improve.

b. Crew Audits are conducted routinely and documented by the General Foreperson, Regional Safety Supervisor, and our Corporate Safety Consultants to assure that we are in compliance with Federal, State, Local, and Customer Contract requirements.

c. Onsite inspections as well as tailgate meetings are held to further reinforce our Asplundh Safety Value, our safety expectations, and OSHA / regulatory compliance.

d. Job Completion Quality Assurance – Crew foreman inspects work and signs off. For projects of significant scope and scale of the project may be field inspected by the GF with the Foreperson to provide checks and balances validation of completion with quality. Job performance and lessons learned are reviewed weekly. General Foreperson inspects and evaluates work and turns in as complete. Depending on area, utility then audits for quality assurance before signing off on invoice.

e. Quality records are maintained as required on a project or program specific basis.

f. The Director of Risk Management directs a team of corporate safety management personnel who are responsible for coordinating third-party field operations auditing for compliance and assisting with the implementation of program requirements.

18) Non-Conformances

a. Defect Correction and Continual Improvement
    i. Non-Conformances are corrected in a timely manner
    ii. Incident Reporting System – Any accidents, customer complaints, property damage, operational near misses, or other mutually defined operating anomalies are reported procedurally. Incident investigations and corrective action plans are commissioned for incidents with high potential consequence.

19) Corrective and Preventive Action

a. Supervisory Team and personnel take corrective and preventative actions to meet or exceed Asplundh requirements and our customer commitments.

b. Job Behavior Observation and Audit Program non-conformances are corrected and lessons learned are rolled back into training, processes, and procedures.

c. Incident Reporting System lessons learned are corrected and lessons learned are rolled back into training, processes, and procedures.

Substation	Feeder	Miles	Total Price	Total Price w/ Overhang Removal
012-Lewisport	2- Lewisport	10.36	$62,439.80	
012-Lewisport	3- Shopping Center	28.37	$143,572.40	
012-Lewisport	5- Dal Tile	0.78	$3,389.40	
012-Lewisport	6- Mcgill Lane	6.23	$17,959.19	
012-Lewisport	7- Maxwell Bros	33.15	$247,296.81	
015-Whitesville	1- Hwy 54 West	20.46	$158,476.00	
015-Whitesville	2- Whitesville	49.76	$388,034.39	
015-Whitesville	3- Ralph	90.45	$894,716.80	
015-Whitesville	4- Stevens Sch. Rd	43.6	$358,990.39	
018- South Dermont	1- Lake Forest	2.73	$20,149.91	
018- South Dermont	2- Old Mill	2.34	$36,918.00	
018- South Dermont	3- Windridge Club	12.86	$187,669.99	
018- South Dermont	4- Scotty Lane	3.76	$69,655.20	
018- South Dermont	5- Southeastern Pkwy	5.41	$90,086.40	
018- South Dermont	6- Kenergy	3.59	$39,626.40	
026- Pleasant Ridge	2- Maple Leaf Lake	37.97	$308,309.60	
026- Pleasant Ridge	3- Popular Log Brg	29.15	$198,634.81	
027- Bon Harbor	1- Post Office	2.59	$31,986.00	
027- Bon Harbor	2- Ben Hawes Park	10.63	$70,987.19	
027- Bon Harbor	3- Worthington Rd	1.6	$13,351.20	
027- Bon Harbor	4- 5th Street Rd	9.82	$80,599.60	
027- Bon Harbor	5- Lee Rudy/Hwy 60	20.94	$107,252.11	
041- Beda	1- 231 North	50.68	$323,827.19	
063- Geneva	1- Alzey	48.21	$299,113.19	
063- Geneva	2- Airport/Office	37.79	$279,013.41	
063- Geneva	3- Smith Mills	99.53	$539,574.80	
080- Niagara	1- Niagara	78.13	$545,148.79	
080- Niagara	2- Hwy 283.S	43.50	$311,284.01	
082- RaceCreek	1- Spottsville	18.78	$208,322.81	
082- RaceCreek	2- Country Club	10.91	$138,518.99	
082- RaceCreek	3- Rucker Rd #1	21.33	$163,752.41	
085- Sullivan	2- Blackford	71.65	$474,802.20	

085- Sullivan	3- KyStone	50.98	$500,059.20	
090- Zion	1- Hwy 1078 North	9.67	$141,330.60	
090- Zion	2- Beals/Reed	56.17	$342,408.40	
090- Zion	3- Hebbardsville	69.38	$417,339.98	
090- Zion	4- Galloway Corner	16.95	$102,252.00	
106- Adams Lane	1- Happy Acres	8.56		
106- Adams Lane	2- Adams Lane	18.69		
106- Adams Lane	3- Cresline	1.67		
		1139.13	$8,316,849.57	

Section III: Pricing

Line Clearance

Kenergy is requesting pricing for Contractor to perform vegetation management control activities on Kenergy's electric distribution facilities.

a. Routine Circuit Maintenance - Please provide TWO lump sum per circuit prices for those circuits identified below. One price is to trim the circuit **NOT** removing overhang, and the second price is to trim the circuit and **REMOVE ALL** overhang.

2022 Proposed Circuits

2022 RCM Circuits with Completion Dates			
Substation	**Feeder**	**Miles**	**COMPLETION DATE**
012-Lewisport	2- Lewisport	10.36	MAY 2022
012-Lewisport	3- Shopping Center	28.37	MAY 2022
012-Lewisport	5- Dal Tile	0.78	MAY 2022
012-Lewisport	6- Mcgill Lane	6.23	MAY 2022
012-Lewisport	7- Maxwell Bros	33.15	APRIL 2022
015- Whitesville	1- Hwy 54 West	20.46	JUNE 2022
015- Whitesville	2- Whitesville	49.76	JULY 2022
015- Whitesville	3- Ralph	90.45	November 2022
015- Whitesville	4- Stevens Sch. Rd	43.6	December 2022
018- South Dermont	1- Lake Forrest	2.73	November 2022
018- South Dermont	2- Old Mill	2.34	November 2022
018- South Dermont	3- Windridge Club	12.86	December 2022
018- South Dermont	4- Scotty Lane	3.76	November 2022
018- South Dermont	5- Southeastern Pkwy	5.41	November 2022
018- South Dermont	6- Kenergy	3.59	November 2022
026- Pleasant Ridge	2- Maple Leaf Lake	37.97	December 2022
026- Pleasant Ridge	3- Popular Log Brg	29.15	December 2022
027- Bon Harbor	1- Post Office	2.59	MAY 2022
027- Bon Harbor	2- Ben Hawes Park	10.63	APRIL 2022
027- Bon Harbor	3- Worthington Rd	1.6	MAY 2022
027- Bon Harbor	4- 5th Street Rd	9.82	APRIL 2022
027- Bon Harbor	5- Lee Rudy/Hwy 60	20.94	MAY 2022
041- Beda	1- 231 North	50.68	December 2022
063- Geneva	1- Alzey	48.21	December 2022
063- Geneva	2- Airport/Office	37.79	December 2022
063- Geneva	3- Smith Mills	99.53	December 2022
080- Niagara	1- Niagara	78.13	November 2022
080- Niagara	2- Hwy 283 S	43.5	November 2022

082- RaceCreek	1- Spottsville	18.78	December 2022
082- RaceCreek	2- Country Club	10.91	December 2022
082- RaceCreek	3- Rucker Rd #1	21.33	December 2022
085- Sullivan	2- Blackford	71.65	MAY 2022
085- Sullivan	3- KyStone	50.98	JUNE 2022
090- Zion	1- Hwy 1078 North	9.67	JUNE 2022
090- Zion	2- Beals/Reed	56.17	AUGUST 2022
090- Zion	3- Hebbardsville	69.38	OCTOBER 2022
090- Zion	4- Galloway Corner	16.95	OCTOBER 2022
106- Adams Lane	1- Happy Acres	8.56	November 2022
106- Adams Lane	2- Adams Lane	18.69	November 2022
106- Adams Lane	3- Cresline	1.67	OCTOBER 2022
		1139.13	

Please note: Kenergy strongly recommends an on-site field assessment of the scope of work. *Kenergy will provide maps of each circuit proposed to be cleared during 2022 in shape files or PDF format.*

b. Service Orders and Work Orders - Vegetation management control activities performed on a specific portion of a circuit identified by Kenergy through a Kenergy generated Job Order or Work Order. This work will be paid using time and equipment cost (T & E), based on the labor rates and equipment rates provided in 3. Labor Rates and 4. Equipment Rates below.

   All work orders will be bid using these T & E rates. Work order bids must be returned to Kenergy within three (3) business days from the time received by Contractor.

3. Labor Rates

Complete the following billable labor rate table for each individual labor classification that you will be utilizing.

Labor Classification	Rates		
	Straight	OT	Premium
General Foreperson	58.29		83.94
Foreperson A	41.33	59.52	77.70
Foreperson B	38.57	55.54	72.51
Foreperson C	37.14	53.48	69.82
Climber A	36.40	52.42	68.43

Labor Classification	Rates		
	Straight	OT	Premium
Climber B	33.54	48.30	63.05
Climber C	32.12	46.25	60.38
Groundperson	31.31	45.09	58.86
Operator	37.14	53.48	69.82

Note:

1) *All management labor positions for this project above the Foremen level must be accounted for in overheads and will not be billed on an hourly basis.*
2) *Use this form or submit a separate spreadsheet.*
3) *Clearly define when OT and premium rates of pay would apply.*

4. *Equipment Rates*

Complete the following billable equipment rate table for each piece of equipment that you will be utilizing.

Equipment Type	Hourly Rate
55' Lift	17.36
70' Lift	22.80
Split Dump - Regular	11.79
Disc Chipper	6.67
Sky Trim	52.50
RayCo Mower	90.00
Pull Truck	15.00
Loader Truck	55.00
Saw	.90
Stump Grinder	15.00
Backyard Lift	38.25
Trailer	4.82

Herbicide Application

Kenergy is requesting pricing for Contractor to perform **High Volume** foliar application to Kenergy's rights of way and bare ground application to Kenergy's substations and lots. Foliar application is performed in the year following line clearance. Bare ground application is performed every year.

Type of Application	Price Per Acre Sprayed
Foliar	
Bare Ground	

Please describe the application technique proposed (low volume, high volume, stubble spraying, etc.) and the chemical formula proposed for use on Kenergy's system.

2022 Foliar Herbicide Application Circuits			
Sub/Feeder	Substation	Feeder	Miles
081-04	PROVIDENCE	LIBERTY	64.52
081-01	PROVIDENCE	PROVIDENCE	52.07
080-03	NIAGARA	ANTHOSTON	27.13
028-02	MACEO	MACEO	12.4
028-03	MACEO	FISH/GAME DAV.	26.55
028-04	MACEO	CARPENTERS LAKE	11.42
042-03	NUCKOLS	NUCKOLS	46.74
033-01	BEECH GROVE	WEBSTER WATER	25.87
033-02	BEECH GROVE	BEECH GROVE	13.37
033-03	BEECH GROVE	ELBA	34.95
033-04	BEECH GROVE	HUDSON FOOD	32.15
013-02	HAWESVILLE	KELLY HEIGHTS	30.64
013-03	HAWESVILLE	HWY 69	45.54
013-04	HAWESVILLE	UTILITY/HWY1389	55.65
062-02	DIXON	DIXON	34.18
			513.18

Section IV: Insurance Requirements

The successful Contractor(s) shall take out and maintain throughout the term of the agreement the following types and minimum amounts of insurance:

Workers' Compensation - Workers' compensation and employers' liability insurance, as

required by law, covering all its employees who perform any of the obligations of the Contractor(s) under the contract. If any employer or employee is not subject to the workers' compensation laws of Kentucky, the insurance shall be obtained voluntarily to extend to the employer and employee coverage to the same extent as though the employer or employee were subject to the workers' compensation laws.

Public Liability Insurance - Covering all operations under the agreement shall have limits for bodily injury or death of not less than $1 million each occurrence, limits for property damage of not less than $1 million each occurrence, and $2 million aggregate for accidents during the policy period. A single limit of $1 million on bodily injury and property damage is acceptable. This required insurance may be in a policy or policies of insurance, primary and excess including the umbrella or catastrophe form.

Automobile Liability Insurance - For all motor vehicles used in connection with the agreement, whether owned, non-owned, or hired, shall have limits for bodily injury or death of not less than $1 million per person and $1 million each occurrence and property damage limits of $1 million for each occurrence. A single limit of $1 million of bodily injury and property damage is acceptable. This required insurance may be in a policy or policies of insurance, primary and excess including the umbrella or catastrophe form.

Kenergy shall have the right at any time to require public liability insurance and property damage liability insurance greater than those required in the previous paragraphs. In any such event, the additional premium or premiums payable solely as the result of such additional insurance shall be added to the agreement price.

Kenergy shall be named as Additional Insured on all policies of insurance. The firm shall furnish Kenergy a certificate evidencing compliance with the foregoing requirements which shall provide not less than (30) days prior written notice to Kenergy of any cancellation or material change in the insurance.

Section V: RFP Process and Schedule

1. Contractor Selection Timeline

Milestone	Due Date	Responsible
1. Issue RFP	5/14/21	Kenergy
2. Submit RFP	10/15/21	Contractor(s)
3. Evaluate proposals and negotiate agreement	10/15/21 – 11/1/21	Kenergy/Contractor(s)
4. Award contract	12/1/21	Kenergy
5. Initiate Project	1/11/22	Contractor(s)

2. *Kenergy RFP Response*

Kenergy is committed to providing an opportunity to every qualified company that has a genuine interest in our business. Recognizing that preparing a response to this RFP can be expensive and time consuming, we encourage you to be realistic about your ability to meet our requirements and schedule. All expenses, related to developing and submitting this RFP are entirely the responsibility of your company, and the submission of this proposal in no way obligates Kenergy to you or any other Contractor.

3. *Process for Inquiries and/or Clarifications*

Please direct any questions and/or comments in writing via email to Steve Thompson (sthompson@kenergycorp.com). Formal responses to questions will be delivered via email.

4. *Proposal Submission Deadline*

Proposals will be accepted electronically via email to sthompson@kenergycorp.com. The subject line of the email should read "RFP No. O202140 – Vegetation Management".

RFP responses are due no later than 3:00 PM CST on October 15, 2021. To be considered, all materials must be received by the deadline stated above. No extension of time will be granted for the submission of responses to this RFP. Any proposals or supplemental information received after 12:00 PM CST on October 15, 2021 will not be considered.

5. *Selection Criteria*

Final negotiations will address each of these performance areas.

- Cost
- Safety
- Work Scope
- Quality

6. *Exceptions*

Identify and explain any exceptions you are taking to any portion of this RFP. Any deviation from the specifications contained in the RFP or where submitted literature does not fully support the specifications contained in this RFP must be identified and explained.

7. Disclaimer

Kenergy reserves the right to reject any and all responses to this RFP. Although it is Kenergy's intent to perform vegetation management control activities for the scope of work stated herein, Kenergy reserves the right to modify the 2022 scope of work following receipt and review of the responses to this RFP.

8. Confidentiality

All information contained in this Request for Proposal and its Exhibits is considered Confidential. Contractors must take all reasonable precautions to prevent such Confidential Information from being disclosed to third parties, including officers and employees not having a legitimate need for the information, and shall not disclose any Confidential Information to third parties. "Confidential Information" includes any information or technical data including, but not limited to, commercially sensitive or proprietary information, processes, methods, specifications, protocols, designs, drawings, diagrams, engineering, documentation, procedures, data concepts, financial information, business opportunities, software and related documentation, hardware information, in any form whatsoever, including in writing, orally, machine readable form or through access to party's premises.

Exhibit 1
Safety Information

Contractor Name: Asplundh Tree Expert, LLC

A. Provide a copy of the most recent OSHA Form 300A for your company.

B. Provide a copy of your company's safety program, policy, procedures and manual.

C. Provide a summary of recordable and lost-time incidents from the time of your last submitted OSHA Form 300A to the present.

D. Please describe the following about your occupational safety and health program:

D-1. How your on-site supervisors are held accountable for safety performance & how this performance is monitored, assessed, and communicated to them.

D-2. How your safety programs apply to subcontractors, and how you assure successful implementation of and compliance with these programs.

D-4. Your incident investigation procedures and the types of incidents that are investigated.

E. Please describe the following about your environmental experience:

E-1. A list of the employees that maintain a Commercial Pesticide Applicator Supervisory License for Kentucky.

E-2. A list of the employees that maintain a Commercial Pesticide Applicator License for Kentucky.

E-3. The product label and material safety data sheet for all pesticides you propose to use during this project.

E-4. A copy of your pesticide safety and training manuals.

E-5. A description of where and how you intend to store and distribute pesticides during this project.

E-6. Your pesticide spill clean up policies and procedures.

E-7. A list of the Personal Protective Equipment and clothing worn by your workforce.

E-8. A description of how you propose to dispose of empty pesticide containers.

E-9. A list of the employees that maintain an ISA Certified Arborist license (name and license number).

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2021

U.S. Department of Labor
Occupational Safety and Health Administration
Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0 (G)	2 (H)	0 (I)	1 (J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
251 (K)	0 (L)

Injury and Illness Types

Total number of (M)			
(1) Injuries	3	(4) Poisonings	0
(2) Skin disorders	0	(5) Hearing loss	0
(3) Respiratory conditions	0	(6) All other illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Establishment information

Your establishment name: Asplundh Tree Expert, LLC - 059

Street: 200 Two Oaks Drive

City: Nicholasville State: KY ZIP: 40356-

Industry description (e.g. *Manufacture of motor truck trailers*)

Tree Trimming Services

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)

OR

North American Industrial Classification (NAICS), if known (e.g., 336212)

561730

Employment information

(If you don't have these figures, see the Worksheet on the back of this page to estimate.)

Annual average number of employees: 307

Total hours worked by all employees last year: 340,361

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company executive Title

Phone Date

UTILITIES SERVICE, LLC

SAFETY MANAGEMENT PROCESS

A Blueprint to World-Class Safety

"Safety First...No One Gets Hurt! ®"

Notice

The contents of this publication are confidential and proprietary, and strictly for use only by the employees of Utilities Service, LLC. and its subsidiaries.

Any other distribution of this information in any form must be approved by Corporate Safety or by Corporate General Counsel.

Revision #	*Date*	*Description*
Rev 1	2017 04-17	Add new Elements based on the National Safety Council (NSC).
Rev 2	2018 01-15	Minor Edits. Refined Audit Element #3.

EXECUTIVE SUMMARY - COMMITMENT TO HEALTH & SAFETY

Our Company's commitment to Health & Safety is so fundamental that we consider it "Who we are" and part of our business culture. In our business operations, we focus on maximizing shareholder value and controlling operating costs, but we will never compromise on safety. Our primary goal is to conduct safe operations and to be committed to continuously improving our health & safety performance.

Our focus on health & safety puts people first and that is the right thing to do - period.

Health & safety promotion also makes good business sense because a good safety record reduces hazards, costs, while enhancing productivity. When we care for people, it is reflected in the care employees take for each other, for their equipment, and in every aspect of their work. Safe production is always our primary goal, and we are committed to improving our safety performance at every work site or location. Over the past decade, our safety performance has continuously improved and we have earned a reputation as a safe company. This makes us the employer of choice in our industry for current and new employees.

PURPOSE

The Safety Management Process is to set out our approach to achieving the goal of zero incidents. This goal is supported by our principals-based approach, which encourages people to speak up about health & safety concerns and take responsibility for their actions.

We invest in safety training and mentoring, promote hazard assessments, and visible approachable leadership, conduct regular audits to assess our performance, and celebrate our successes through recognition programs. These many efforts combine to create a safety culture where each employee acts with the knowledge that their health and safety depends on the actions of every other employee throughout the company.

Our Safety Management Systems and Processes are only as good as the leadership and commitment every employee demonstrates each day on the job. We must all be engaged in the Safety Vision. Maintaining a safe and healthy workplace requires diligent effort every day.

Speak up if something is not right. Make suggestions to enhance safety. Accept responsibility for your health & safety, do not take shortcuts, and look out for your co-workers. When we all accept this daily challenge, our Safety Vision "Safety First... No One Gets Hurt! ®" can be achieved.

HEALTH & SAFETY POLICY

The Corporate Health & Safety Policy outlines our Company's commitment to a zero-incident work environment with a safety culture based on crew teamwork and safety leadership.

To provide each employee with a safe place to work, free from all recognized hazards.

The Policy reflects our **Corporate Safety Vision –**

"Safety First... No One Gets Hurt! ®"

*"We are committed to performing every job in a safe and healthy manner. Work-ralated injury or illness is unacceptable, and we are committed to identifying, controlling **and** eliminating workplace hazards to protect ourselves, our co-workers, customers, and the public.*

EVERYONE is responsible for workplace safety."

Scott M. Asplundh, Chairman & Chief Executive Officer

GOVERNANCE

The Company provides governance for health & safety as part of an integrated framework that also includes community relations and the environment. We want to be a welcomed partner in the communities where we operate, and these corporate functions play a significant role in the company's vegetation management responsible approach. Our activities in these areas influence our company's reputation, and they are vital to maintaining public support and our social "license to operate".

The Company has established a Health & Safety Leadership Committee at the Corporate Level consisting of –

- The CEO
- The Presidents
- Executive Leadership
- The Vice President of Corporate Safety

The Health & Safety Leadership Committee provides corporate oversight, sets safety performance targets for the Regions and provides direction regarding the Safety Management Process and effective integration of safety into field operations.

Corporate Safety reaches out and requests input from employees, customers, industry groups, regulators, subject matter experts and national resources on best practices in health & safety management to inform and shape the development of our safety culture.

This governance model provides for alignment between policy direction and implementation, with strong oversight at each level of the business to ensure accountability for activities and results.

INTRODUCTION

Our Safety Management Process defines the company's philosophy and requirements that ensure all Regions are aligned with our respect for people and our overarching objective of safe operations. The Safety Management Process is only as good as the leadership and commitment EACH Employee demonstrates EVERY day on the job.

INTEGRAL PARTS OF THE SAFETY MANAGEMENT PROCESS INCLUDE:

- A clearly articulated Safety Vision of "Safety First… No One Gets Hurt! ®" reflecting our goal of continuously working toward zero incidents.
- Health & Safety Policies and Work Procedures for each business level.
- A courageous leadership approach that empowers employees to speak up about issues.
- Standards and guidelines that specify requirements for many job tasks.
- An organizational structure that clearly defines roles, responsibilities and accountabilities.
- Extensive training at all business levels.
- SafetySuite in order to assist leadership in implementing and complying with the Safety Management Process to manage safety records and programs.

KEY ASPECTS OF THE SAFETY MANAGEMENT PROCESS INCLUDE:

- Application to all Companies and all Regional Operations.
- Compliance with all applicable laws, regulations and corporate safety policies.
- Adoption of industry best practices.
- Visible and engaged leadership to create a positive safety culture.
- State-of-the-art hazard assessment tools to identify and correct hazards.

We review and measure various metrics to verify progress against the objectives of the Safety Management Process. Our goal is to incorporate safety measures proactively into each employee activity. Safety performance is measured by auditing leading indicators – this is "how" each person engages in their activities safely and responsibly – and by reviewing lagging safety statistics.

Our Blueprint of Safety is comprised of these Ten Elements, based on proven safety management best practices:

1 — Management Leadership & Commitment	**6 — Operational Safety Programs**
2 – Communication & SafetySuite Documentation	**7 — Employee Involvement & Recognition**
3 — Assessments, Audits and Continuous Improvement	**8 — Motivation, Behavior and Attitudes**
4 — Hazard Recognition, Evaluation and Control	**9 — Training & Orientation**
5 — Incident Reporting, Investigation, Case Management and Follow-Up	**10 — Statistical Reporting and Trend Analysis**

Note: This Safety Management Process shall be followed when developing a Region SMP.

Let it guide the regional policy and procedure implementation. The Region's SMP Manual will govern how to review and analyze the safety program at the regional business levels.

TABLE OF CONTENTS

Definitions

- **Action Plan** — a written sequence of events needed to achieve major objectives.
- **Days Away, Restricted or Transferred (DART) cases** — a term used to describe or group injuries that resulted in days away, restricted or transferred job duties.

$$\text{DART} = \frac{200{,}000 \times (\#\text{ of OSHA Recordable Incidents Resulting in Days Away / Loss Time / Transferred or Restricted Duty})}{\text{Hours Worked}}$$

- **Injury Severity** — the injury severity rate is the number of lost work days experienced per 100 workers. The injury severity rate shows the extent of safety anomalies by revealing how critical the injuries and illnesses are. The theory is that an employee with an injury which requires time to return to work, had a more severe injury than the employee who can return immediately after being injured.
- **Job Behavior Observation** (JBO) — a task observation process performed in the field, by supervisory and management personnel to identify safe and unsafe behavior(s).

  Key Performance Indicator (KPI) — an agreed quantifiable measurement which reflects a critical success factor.
- **Lagging Indicator** — a measurable safety factor that *confirms success or failure* regarding safety processes.
- **Leading Indicator** — a measurable safety factor designed to *provide an early indication of success or failure.*
- **Lessons Learned** — a tool to communicate root causes of incidents, and corrective actions implemented to prevent recurrence of a similar incident.
- **OSHA Recordable Injury or Illness —**

  Any work-related fatality.
  Any work-related injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job.
  Any work-related injury or illness requiring medical treatment beyond first aid.
  Any work-related diagnosed case of cancer, chronic irreversible diseases, fractured or cracked bones or teeth, and punctured eardrums.
  There are also special recording criteria for work-related cases involving: needle-sticks and sharps injuries; medical removal; hearing loss and tuberculosis.
  Refer to the Incident Management Guide (IMG) for clarification.
- **Performance Metric** — a standard of measurement constructed to encourage performance improvement, effectiveness, and efficiency.
- **Policy** — a comprehensive plan or course of action intended to influence and determine decisions, actions, and other matters; (e.g., the Company's Substance Abuse Policy).
- **Practice** — the performance of a task conducted using learned behaviors that may or may not be considered a "best practice" or standard.

- **Procedure** — a series of activities, decisions, and other processes that, when performed in a defined sequence, produce a desired result. Following a procedure for the same task should produce the same results.
- **Process** — a written series of activities that define who, what, when and how a particular safety element will be managed; (e.g., Safety Management Process).
- **SafetySuite** — the company's safety management information system for the collection of incident reports, investigations, analysis and trending; Job Behavior Observations; training and compliance tracking; distribution of corporate and regional safety policies and lessons learned from incidents. SafetySuite is also a statistical tool for auditing trends in safety performance.
- **Serious Injury and Fatality (SIF)** — the term SIF was developed by the Edison Electric Institute – an industry group – as a metric that better facilitates the prevention of fatalities and serious injuries which are life threatening, or life changing to the employee. The metric should reflect the extent of serious injury to the employee(s) from work-related events, within the control of the employee and/or the employer. It usually requires the intervention of internal and/or external emergency response personnel to provide life-sustaining support.
- **Standard** — a clear safety expectation of safety performance that is communicated, agreed upon, enforced and audited for compliance (e.g., seat belt use).
- **Total Case Incident Rate (TCIR)** — a TCIR is defined as the average number of work-related injuries incurred by 100 workers during a one-year period. Use of the TCIR to report workplace injuries allows comparison of accident and injury statistics across industries, among industry segments, and from one year to the next.

  Here is the formula for calculating the TCIR:

$$\text{TCIR} = \frac{200{,}000 \times (\#\ \text{of Injuries Incurred})}{\text{Hours Worked}}$$

1) Management Leadership & Commitment

The Corporate Safety organization plays a key role in supporting line management's responsibility for managing safety. Safety professionals assist with coordination, training, program implementation and other activities for which they have special skills & experience.

The development of the company's safety process is the responsibility of Corporate Safety. The responsibility for implementing safety programs is directed by the Sponsor through the Region Manager (RM), Supervisor, General Foreperson (GF & Associate GF) and each Foreperson, with a goal to establish safety management as an integral part of the crew operations.

The specific safety responsibilities for management and field personnel must be communicated to **each level** of the organization:

- Sponsor
- Corporate Safety
- Region Manager / Supervisor / Superintendent
- Region Safety Management
- General Foreperson / Assistant General Foreperson
- Crew Foreperson
- Crewmember

In addition to clearly stated roles and responsibilities, management must have high ethical standards in conducting safety management in the region. Management visibly demonstrates safety leadership by being actively engaged in health & safety program implementation, by modeling safe behaviors during day-to-day activities and by visiting field operations. The region shall develop a process to ensure that safety policies are being followed. Policies and safe work procedures shall be periodically audited, reviewed and updated, where necessary.

Holding everyone accountable for meeting their responsibility to safety standards is integral to protecting all workers' health and safety.

To achieve a more proactive and inclusive safety culture, the Region Manager shall develop a process that promotes objective and measurable safety activities that support their stated safety goals.

This element sets up a method for defining accountability at all levels of the company. It clarifies the activities each person will perform to contribute to the safety culture.

This element focuses on:

Action plans based on proactive safety activities for each member of management, are determined at the crew levels and approved by each successive supervisor up to and including the Sponsor.
Successful completion of safety activities as identified in the action plans, which are linked to annual incentives and pay increases.
Periodic status reports that show progress on the action plans.

Management Leadership & Commitment Implementation Plan

Include steps for communicating corporate safety standards and detailing how the ***Region Policy Manual*** is reviewed.

Focus on proactive activities that support the region's safety goals. Part of the employee's compensation or bonus shall be based on performance versus declared safety goals.

Action / Responsibility	Minimum Requirements
Region Management Safety Responsibilities	Region will specify safety roles, responsibilities, and accountabilities for all levels of management. Region will specify how to communicate and manage these responsibilities. Management visibly demonstrates the importance of health & safety management by being proactively involved in safety program implementation. Understand and improve the safety performance metrics, hold people accountable, and model safe behaviors in day-to-day activities, and during field visits. See **Health and Safety Responsibilities** for detailed responsibilities of all levels of employment. ♦ Conducts annual file audits of Region data base for compliance and accuracy. ◊ Personnel File ◊ Certification / Qualification Files ◊ Driver Qualification Files ♦ Periodically reviews Region programs and SMP processes for compliance. ◊ Equipment / Tool Inspections ◊ MOR Reports / Tracking / Analysis ◊ JBO Reporting / Tracking / Analysis ◊ Near Miss / Close Call Reporting / Tracking / Analysis ◊ Incident Investigation Reporting ◊ Safety Recognition Programs Development / Implementation ♦ Conducts periodic GF Operation Audits (annual goal of 25% of GF's per year) for compliance with the following; ◊ JBO's ◊ Performance Notices ◊ OSHA Notebooks ◊ GF Monthly Training Guide ◊ Crews ◊ Job Briefings ◊ Training Certification / Qualification Compliance ◊ Safe Work Practices ◊ Tools and Equipment Inspections ♦ Actively participates on Region Safety Committee and assists in the development / implementation of safety standards, and SMP processes. ♦ Attends scheduled General Foreperson's meetings. ♦ Periodically attends scheduled Forepersons meetings. ♦ Periodically attends scheduled All Hands meetings. ♦ Oversee the implementation of the SMP Process at the Manager's direction. ***Safety Standards*** ♦ Safety standards will be under an ongoing review by the Safety Committee to address any area for improvement. Once the Safety Committee determines improvements need to be made, the Manger will send out a communication to the field. New Corporate standards will be communicated through the Region Manager in the same manner.

Regional Safety Management Safety Responsibilities	Set specific objectives & expectations for the regional safety management: ✓ Role in communicating and implementing safety policies and procedures. ✓ Using SafetySuite to track events, all incident events, all training, the JBO process, and performance notices as needed. ✓ Fully participating in the audit process, including roll out of corrective actions. **Safety Policies & Procedures** ♦ Reviews Corporate Safety Policies with all members of Management and Supervision on a conference call. ♦ Sends copies of Corporate Safety Policies to all members of Supervision with the following instructions; ◊ When a copy of the policy needs to be signed and sent to the Region Office. ◊ What needs to be done to update Region Policy Manuals in the field. The region will use the following steps in developing, drafting, communicating and implementing Safety Standards and Policies: ♦ The new proposal / revision shall flow upwards through the chain of command for review by the RSS. ♦ The RSS will review the proposal and analyze to determine if the proposal adds value to the Region's Safety Management Process. ♦ If the proposal is deemed to add value the RSS will present the proposal to the Safety Committee for review, editing and or approval. ♦ The Safety Committee may elect to: ◊ Implement the proposal as is with Manager Approval. ◊ Return to originator for additional development. ◊ Approve as a limited pilot program for additional input / analysis. ◊ Reject in its entirety. ♦ If approved and the proposal becomes Region Policy a copy shall be placed in each of the Region's RPM's. Whether a signed copy will be returned to the Region Office will be determined by the Safety Committee (with Manager Approval). ♦ If approved the original author of the proposal shall be recognized and rewarded per the Safety Recognition element criteria. ♦ Region safety standards will be enforced using the disciplinary guidelines established in Region Policy Manual. **Safety Suite** ♦ Incident Events ◊ Enters events into Safety Suite. ◊ Ensures communication with CSC is completed. ◊ Ensures communication with Risk Management is completed. ◊ Ensures injury incidents are properly classified. ◊ Uploads documentation for events into Safety Suite. ◊ Adds / assigns Corrective Actions as needed. ◊ Monitors event Days Away and/or Restricted Duty Days for accuracy. ◊ Continually monitors events and add updates as needed. ◊ Reviews OSHA Log for completeness and makes corrections as needed. ◊ Completes OSHA Log review Corrective Action by the 3rd of every month. ♦ Training ◊ Add and edit classes. ◊ Upload sign-in sheets. ◊ Monitors classes to make sure they are up to date. ♦ JBO's ◊ JBO's are performed by all members of Management using the OGP App. When a JBO is performed it goes directly in to Safety Suite.

- Monitors JBO's for accuracy and completeness.
- Runs JBO Reports monthly. (Reports will be run more often as needed).

- Performance Notices
  - Performance Notices are performed by all members of Management using the OGP App. When a Performance Notice is performed it goes directly into Safety Suite.
  - Monitors Performance Notices for accuracy and completeness.
  - Runs Performance Notice Reports monthly. (Repots will be run more often as needed.

Field Observations

- Conducts regular job site inspections.
- Performs Job Behavior Observations (JBO's).
- The four objectives of safety management.
- Observing and correcting unsafe acts and at-risk behavior.
- Evaluating General Foreperson knowledge of safety training programs and supervisory skills.
- Identifying jobsite hazards and discusses them with the crew.
- Evaluating Crew Foreperson knowledge of their safety-training responsibilities.
- Observing and reporting on proper work techniques in accordance with the LCQS and Region Policy Manual.
- Verifying required documentation.
- Oversees the data collection, input, and distribution of reports of statistical information gained from the JBO reports.
- Works with the Region Office to monitor files for compliance with required documentation as specified by Corporate and Region Policy.
- Assists in the General Foreperson orientation process and the General Foreperson Mentoring Program.

Assists with the Incident Investigation Process

- Reviews reports ensure that appropriate documentation is complete and filed.
- Ensures that the investigation reaches the main contributing factors.
- Ensures recommendations are appropriate for the root causes.
- Assists Region Manager with assignment of recommendations to individuals and that the recommendations have an achievable completion date.
- Ensures injuries are properly classified according to OSHA rules.
- Ensures communications to Corporate Safety Department are completed.

Rides with General Forepersons to Ensure that they Understand

- OSHA compliance.
- Uniformity and implementation of the Region disciplinary policy.
- How to conduct a thorough safety visit.
- Crew Foreperson evaluations.

Ensures that General Forepersons Implement:

- First Aid / CPR certification classes.
- Basic Work Zone & Flagger training.
- Computer Base Training (CBT).
- Vehicle Loss Prevention Program (VLPP) (DMP).
  - Spanish documentation used for the above four items (when required).
- Tree Felling training. (Levels 1 & 2).
- Split-Tail training.
- Regular scheduled Crew Foreperson meetings.
- Regular scheduled Field Employee meetings.
- Administration of the LCQS with all new employees.

Ensures Regional Compliance with:

- General Foreperson meeting requirements.
- Screening applicants for hiring.
- Pre-job drug testing.

	♦ New employee orientations. ♦ Background checks, etc. ♦ Safety Management Process. **Monitors and Reviews Current Claims:** ♦ Works with Risk Management Department Claims Examiner and Region Insurance Adjuster on light duty positions available. ♦ Establishes a working relationship with local physicians. ♦ Contacts doctors with Job Descriptions for modified duty. (As needed) ♦ Works with Corporate Risk Management Department to question reserves and return to work status on current claims, surveillance, etc. ♦ Informs and communicates with Corporate Safety with questions, concerns, problem areas, etc. ♦ Advises Region Manager on trends within the Region and makes recommendations and assists in the development of corrective action plans. ♦ Consults with the Region Manager, to help establish and implement Regional safety goals. Provides safety coverage on emergency response work when requested by Corporate or the Region Manager. Actively participates in safety teleconference calls as scheduled. Actively participates in the Region Safety Committee meeting.
Regional Safety Policies	✓ Create, communicate, implement, and verify use of the region's safety policies. ✓ Enter and update the regional safety policies in SafetySuite. ✓ Manager is responsible for accurate and complete pre-qualification questionnaires for contract bids. ♦
Region Policy Manual	Follow procedures to update all policies in the Region Policy Manual and ensure these are current. Include a revision date for each regional safety policy.
Safety Activities and Action Plans (Regional Mgmt.)	Develop action plans to define the safety activities for **each** member of management. The action plans must include <u>proactive</u> safety activities. Do not base action plans solely on cost-related or <u>lagging</u> safety metrics. Additionally, action plans shall indicate the frequency, time-period and dates for each activity. *Safety activities and goals include meeting or exceeding requirements for the following:* ✓ *Job Behavior Observations (JBO).* ✓ *Monitor the effectiveness, and frequency of Job Briefings.* ✓ *Perform Incident Investigation(s) using the Incident Management Guide (IMG).* ✓ *Enter the initial Event Record(s) in SafetySuite within 24 hours.* ✓ *Respond promptly to Motorist Observation Reports (MOR).* ✓ *Lead effective and meaningful weekly safety meetings.* ✓ *Follow the General Foreperson Monthly Guide.* ✓ *Conduct safety conference calls, with various levels of management involved.*
Performance Reviews and Status Reports (Regional Mgmt.)	Describe the steps for conducting and evaluating performance reviews (follow HR Policies).

2) Communication & SafetySuite Documentation

Communicating safety information is key to building safety awareness, sharing Lessons Learned, motivating positive behavior, and advising employees of changes in corporate and regional policies.

Research shows that greater safety awareness can reduce occupational injuries. Effective communications help employees keep a safety focus during their work. By motivating employees to support the company's goals, the communication plan shapes the safety culture in the region.

Communicating the "what and how" shows concern for the safety and well-being of the employees, the ultimate success of the Communication Plan depends on visible leadership.

The communication plan includes the following components at a minimum:

- Safety Alerts and Lessons Learned distributed to each organizational level.
- Communicate Company Safety Vision, Policy and Principles.
- Record all Incidents and Events online in SafetySuite.
- Print out and review the OSHA 300 Logs monthly; post the previous year's 300A Log.
- Conduct conference calls between various levels of the organization.
- Safety meetings with GFs, Forepersons and the Crews.
- Safety Communications to the crews, as needed.

Communication & SafetySuite Documentation Implementation Plan

Consider how each action item will demonstrate *visible leadership of safety programs.*

Action Items	Minimum Requirements
Safety Messages	Safety is included in all business meetings. Describe how, and the reason why Safety Messages are included in business meetings. **Safety Messages** ♦ A Safety Message will be given at the beginning of every meeting. ♦ A Safety Message will be given at the beginning of every Conference Call. ♦ Conference Calls are documented in meeting minutes and distributed through e-mail to all Region General Forepersons and above. ♦ The Safety Message will be given to every Crew Foreperson through GF tailgate safety meeting.
Safety Vision, Policy and Procedures	Describe how the Region communicates the Safety Policy to new and current employees. *Recommendation: Also explain what it means to say, "Safety First...No One Gets Hurt!* ® **Vision Policy and Procedures** ♦ New employees will receive a Vision, Policy and Principles wallet card and an explanation of its importance at the time of hire. ♦ The VPP will be explained at time of hire using the NELO. ♦ All employees are required to have a Vision, Policy and Principles wallet card on their persons always. ♦ A laminated copy of the Vision, Policy and Principles are also placed in every Region Policy Manual. ♦ A Vision, Policy and Principles poster hangs in the Region office with the Managers signature.

Incidents & Events / Safety Alerts	✓ Communicate Incidents & Events, Safety Alerts and Lessons Learned throughout the organization. ✓ Use SafetySuite, to communicate and share information. ✓ Perform Safety Stand-downs. **Incident Reporting** ♦ All incidents will be reported to the Region Office, Region Safety Supervisor and Supervisor. ♦ All incidents, Near Misses / Close Calls will be discussed at Region Safety Committee Meetings and during Region Conference Calls. ♦ Incidents that are reportable will be phoned in to Safety and Risk Management Departments. ♦ Incident reports will be relayed via conference calls to all management and delivered to all employees at tailgate meetings. **Safety Alerts / Safety Stand Downs** ♦ Safety Alerts and Stand-Downs will be relayed via conference calls and e-mailed to all management and delivered to all employees at tailgate meetings. ♦ Safety Alerts and Stand-Downs will be signed by all employees and placed in the General Forepersons OSHA Notebook under the Special Bulletins Tab. ♦ Safety Stand Downs will also have a sign-off sheet sent out with them and a copy of the signed sign-off sheet will be sent to the Region Office for tracking. **Lessons Learned** ♦ Lessons Learned will be sent to all supervision to be reviewed with all employees in the field. ♦ Lessons Learned will also have a sign-off sheet sent out with them and a copy of the signed sign-off sheet will be sent to the Region Office for tracking. **Safety Suite** ♦ Incidents and events will be recorded on Safety Suite. ♦ The recording process in Safety Suite will begin within 24 hours of the time of the incident or event concerning Injury / Illness, Auto and Outage. ♦ Additional information will be added as it becomes available. ♦ Any Safety Alerts, Safety Stand Downs and/or Lessons Learned concerning the incident or event will be uploaded into Safety Suite. **OSHA 300 Log** ♦ Will be reviewed monthly to make sure all information is correct and that Restricted Duty and/or Days Away day counts are correct. ♦ Will be sent to General Forepersons annually to be reviewed with all employees, signed by employees and placed in the General Foreperson OSHA Notebook. ♦ General Foreperson is required to keep the previous year's OSHA 300 Log in their OSHA Notebook. **OSHA 300A Log** ♦ Will be printed, signed and posted in the Region Office by February 1st and remain posted until April 1st. ♦ Information from the OSHA 300A Log shall be entered into the OSHA Website annually.
Conference Calls	Describe how Management will comply with the corporate policy regarding Sponsor and Manager conference calls. **Conference Calls (Sponsor)** ♦ Attendance will be taken at every Safety Conference Call. ♦ Safety Conference Calls will be held with all Region management bi-monthly. ♦ Safety Conference Calls will have a documented agenda. ♦ Every conference call will start with attendance. ♦ Every conference call will include a safety message. ♦ All injuries, incidents, Near Misses / Close Calls will be discussed by participants. ♦ Where injuries have resulted incidents will be reviewed, and Vice President and/or Manager will state the action plan to prevent the same type of injury from

	occurring. ♦ Performance Notices will be discussed. ♦ JBO`s will be discussed. ♦ All upcoming safety initiatives and policy changes will be discussed. ♦ All safety action items will be discussed. ♦ Minutes will be generated and distributed to all participants. **(Manager)** ♦ Safety Conference Calls will be held with all Region Management weekly. ♦ Safety Conference Calls will have a documented agenda. The agenda will be sent to all Region Management via email the weekend before the call. ♦ Attendance will be taken at the start of every Safety Conference Call. ♦ Every conference call will include a safety message. ♦ All Injuries, Incidents, Near Misses / Close Calls will be discussed by management during the call and reviewed with field operations. ♦ Where injuries have resulted incidents will be reviewed, and General Foreperson and Supervisor will state the action plan to prevent the same type of injury from occurring. ♦ Performance Notices will be discussed as needed. ♦ MOR's will be discussed as needed. ♦ Minutes will be generated and distributed to all Region Management via email. ♦ General Forepersons will review the minutes with all employees.
GF / Crew Foreperson Meetings	✓ Schedule required group meetings for General Forepersons, Crew Forepersons, and all Field Employees per the Corporate Safety Communications & Meetings Policy. ✓ Develop and manage agendas. **Supervision & General Foreperson Meetings** ♦ There will be one in-person Safety Meeting per year. ♦ Additional meetings will be scheduled as needed. ♦ An agenda will be put together for the meeting(s). ♦ The meeting(s) will be entered into Safety Suite under the training module. ♦ Agenda and sign-in sheet will be uploaded in Safety Suite. **Crew Foreperson Meetings** ♦ There will be two Crew Foreperson Meetings per year, not scheduled closer than three months apart. ♦ An agenda will be put together for the meetings. ♦ The meeting(s) will be entered into Safety Suite under the training module. ♦ Agenda and sign-in sheet will be uploaded in Safety Suite. **Field Employee Meetings** ♦ There will be one Safety Meeting per month with all Field Employees. ♦ Meetings will be documented with a sign-in sheet. Topics discussed during the meeting will be added to the sign-in sheet. ♦ Sign-in sheets will be sent to the Region Office for tracking. **Crew Weekly Safety Meetings** ♦ A Safety Meeting will be conducted weekly. ♦ The duration of this meeting shall be approximately 10 minutes, or whatever time is required to adequately discuss the topic. ♦ The Foreperson shall use the weekly safety topic from the WSMB as the basis for conducting the safety meeting with the crew. ♦ Foreperson and Crew Members will sign the sign-off sheet in the WSMB.

PROCESS OWNERSHIP:
All levels of Management must be involved in the Communication Implementation Plan for it to be effective.

ROLES AND RESPONSIBILITIES:
RSS or designee will host the weekly conference call.
RSS will put together agendas for General Foreperson meetings.

RSS, with the assistance of the General Foreperson will put together agendas for the Crew Foreperson meetings.
General Forepersons will send the Field Employee Meetings sign-in sheets to the Region Office monthly.
Office Admin will add the Field Employee Meetings to an Excel tracking and file the sign-in sheets.
General Forepersons, Supervisors and RSS will check WSMB's to make sure the Crew Weekly Safety meetings are taking place.

TOOLS / REFERENCES:

- Weekly Safety Conference Call
- VPP Program
- Corporate Incident Investigation Policy
- OSHA 300 & 300A Logs
- Supervision & General Foreperson Meetings
- Crew Foreperson Meetings
- Field Employee Meetings
- Regional Stand-Downs
- Region Safety Campaigns
- Corporate issued Safety Material: Weekly Safety Meetings, Special Bulletins, Safety Alerts, Lessons Learned and Corporate Safety Stand-Downs.

3) Assessments, Audits, and Continuous Improvement

The Process Evaluation Program determines if policies and procedures are implemented as planned and have met the objectives set forth in the SMP. It also determines whether the objectives are challenging enough to lead the organization to effective health & safety protection. When either the performance or the objectives are found inadequate, revisions are made. Without such a comprehensive review, program flaws and their interrelationship may not be caught or corrected.

Corporate Safety Audit and Evaluation Process

A health & safety audit in the form of a field-based evaluation tool, will systematically and objectively examine a work location's safety process to identify overall strengths and areas for improvement.

An evaluation consists of examining written procedures and documentation, interviewing management and field supervision and physically observing workers and documenting worksite conditions. After an initial baseline evaluation, progress improvements can be monitored and integrated into a corrective action plan and into the region's performance appraisal process.

A systematic health & safety process evaluation program:

- Provides consistent, objective, and comprehensive assessment to ensure that a location's health and safety process meets organizational standards and regulatory requirements.
- Measures proactive activities rather than reactive statistics.
- Fits into the organization's performance appraisal.
- Identifies strengths and weaknesses in a work location's safety process.
- Prioritizes short and long-term "safety process" improvement goals.

Assessments, Audits, and Continuous Improvement Implementation Plan Consider how each action will demonstrate *visible leadership* *based on established work activity guidelines (WAGS).*	
Actions	**Minimum Requirements**
Audit Process	Describe how Regional Safety Professionals will audit regional processes using the audit evaluation tool. Describe how to hold regional management accountable to corporate and regulatory health & safety policies.
Compliance Documentation (Office Audit)	✓ Describe how the auditors will review ***documented*** compliance to safety policies. ✓ Document findings and highlight opportunities for improvement.
Management Interviews	✓ Describe the process to interview the Region's management. ✓ Document findings and highlight opportunities for improvement.
Crew and Site Observation	✓ Describe how field observations and crew coaching by management will take place. ✓ Document findings online and highlight opportunities for improvement.
Corrective Action Plan and Closing Conference	✓ Emphasize positive audit findings and trends. ✓ Describe how the Region will act upon audit findings, and improvement opportunities, using *S-M-A-R-T-E-R* action items (*Specific; Measurable; Accountable; Reasonable; Timely; Effective; and Reviewed*). ✓ Following the corporate policy regarding the safety audit process. ✓ Hold management accountable to completing the audit action plans in the prescribed time. Provide appropriate regional resources.

4) Hazard Recognition, Evaluation and Control

Worksite analysis examines a worksite to identify existing hazards as well as conditions and operations that could change and thereby create more hazards. Then management analyzes these hazards and develops processes to prevent harmful occurrences.

Job Behavior Observations

The purpose of a **Job Behavior Observation** (JBO) is to identify and mitigate unsafe behavior so incidents are reduced or eliminated through observation and online reporting. The JBO process fosters a proactive safety culture where the worker's behavior is observed "upstream" of incidents.

Management and supervision is able to monitor and measure current safety performance, to correct unsafe behaviors thus pre-empting emerging trends of unsafe behaviors.

Job Briefings

Conducting an accurate job briefing to identify workplace hazards is critical to safe work. It is important to conduct multiple job briefings when change in the nature of the work could jeopardize an employee's safety.

Equipment and Tool Inspections

Ensuring that tools and equipment are in proper working order is critical for a safe work environment. A pre-operation equipment checks (**DVIR**) identifies and corrects deficiencies, prior to use. While the JBO focuses on individuals' actions, regular inspections of equipment and housekeeping issues can identify **unsafe conditions** that could lead to incidents.

Inspections must be at least semi-annual. Regions may add to their Form as they see fit.

Hazard Recognition, Evaluation and Control Implementation Plan

List activities needed to implement these items and the parties responsible for their completion. List the activities needed to manage corrective action(s), including follow-up procedures, methods for controlling and reviewing reports, and methods for training your region's inspectors and trainers.

Action Items	Minimum Requirements
JBO Process (Region Mgmt.)	How will the Region monitor and measure the performance of JBOs? *Record the actions taken to address deficiencies identified by trend analysis.* *The JBO monthly summary reports shall be discussed during the monthly meetings of the Region Safety Committee and/or during Manager conference calls.* Every level of Management must perform a specified number of JBO`s per week. ♦ JBO`s will be performed using the OGP App (One Global Platform). ♦ The first weekend of every month a JBO summary report will be generated for the previous month. ◊ JBO Percentage by Observer ◊ JBO Percentage by Question ♦ JBO monthly reports will be sent to all supervision via email. ♦ Region Manager will review all JBO reports. ♦ RSS will update the Safety Suite Corrective Action confirming Manager review by the 6th of every month. ♦ A trend analysis will be conducted by the Region Safety Committee. Trends identified will be discussed on the weekly conference call. Trends identified could result in the development of corrective action plans. ♦ Additional training will be conducted for all supervision as needed. ♦ New General Forepersons will obtain training on performing JBO`s as part of their GF Mentoring Program.

Job Briefings (Employees)	Train the crews and monitor the effectiveness of Job Briefings. Review trends with critical eye, mark deficiencies to improve Job Briefings. ♦ All General Forepersons and Crew Forepersons shall watch the job briefing training video and receive training as detailed in the job briefing video training outline. ♦ Forepersons are responsible for conducting a minimum of two job briefings per day. Once before the start of their first job and again at mid-day. ♦ The Foreperson is responsible for conducting additional job briefings any time a significant change, which might affect safety of the employees, occurs during the course of the work. ♦ Crews will establish a Job Entry Location (JEL) by placing the job briefing in a clear bag and hang it on a cone at the entry location of the job site. ♦ All visitors entering the job site will be briefed before entry is allowed. Visitors will sign the job briefing form. ♦ Supervisors, RSS, and General Forepersons will monitor the effectiveness of job briefings through on-site inspections and will sign the bottom of the form with a red ink pen. ♦ Any deficiencies found during the review of the job briefing will be circled with a red ink pen and discussed with the crew. ♦ Per an agreement with KY. OSHA all job briefing books will be sent to the Region Office for filing and tracking. ◊ Once a job briefing book is full the crew Foreperson will turn the book in to the General Foreperson. ◊ General Foreperson will note the Forepersons name; crew number and date range (first briefing to last briefing) on the front of the job briefing book and send it to the Region Office. ◊ Region Office Admin will add the crew number to the job briefing book tracking sheet and file the book for a period of one year. ◊ Office Admin will send RSS the tracking quarterly for review.
Job Hazard Analysis	Familiarize crews with the Job Hazard Analysis (JHA) per Job Title. Use the JHA to assess jobs, identify potential hazards, and chose the safest way to control the hazard(s) on that job. ♦ All levels of Management will receive training on how to utilize a JHA. ♦ All Forepersons and Crew Members will be trained on how to utilize a JHA. ♦ JHA's for each specific job will be printed and a copy placed on every crew for reference. (Changes and/or additions will be made to JHA's as needed)
Equipment/Tool Inspections/ DVIR (Employees)	Describe the procedures for conducting and tracking formal periodic inspections of equipment and tools: ✓ *Each region will develop and implement an equipment inspection process.* ✓ *These formal inspections shall be conducted on each crew semi-annually.* *Recommendation: perform inspections quarterly.* **Equipment & Tool Inspections** ♦ All Forepersons and Crew Members will be responsible for performing a daily equipment and tool inspection before each use. Any defective tools will be taken out of service and the General Foreperson will be informed so that the defective tool can be repaired or replaced. ♦ Supervisors and RSS will conduct random checks during periodic crew inspections to ensure there is no defective equipment in use by the crews. ♦ General Forepersons are required to perform a comprehensive and documented Equipment & Tool Inspection semi-annually utilizing the safety audit checklist. ♦ RSS will send General Forepersons the semi-annual Equipment & Tool Inspection form in January and July. ♦ General Forepersons will perform and document a semi-annual Fall Protection Inspection Checklist. The Fall Protection Inspection Checklist will be sent to the

	RSS for tracking. ♦ General Forepersons will perform a Fall Protection Color Coding Process quarterly. All fall protection will be tagged using a colored zip-tie or tape. ◊ 1st Quarter – Yellow ◊ 2nd Quarter – Green ◊ 3rd Quarter – Black ◊ 4th Quarter – Blue **DVIR** ♦ All drivers of a CMV will conduct a Pre & Post Trip inspection utilizing the Drivers Vehicle Inspection Report (DVIR). ♦ If any item(s), affecting the safe operation of the CMV, are marked as needing repairs the driver will notify the General Foreperson and note on the DVIR when the General Foreperson was notified. Driver will continue to mark the item until repairs have been made. ♦ All repairs, affecting the safe operation of the CMV, will be noted on the DVIR and signed by the Mechanic / General Foreperson and Driver. ♦ Supervisors, RSS and General Forepersons will perform spot checks of the DVIR for accuracy. Any deficiencies found will be discussed with the driver. ♦ DVIR's will be collected by the General Foreperson and sent to the Region Office monthly. First Friday of every month for the previous month at a minimum. ♦ General Foreperson will review DVIR's before sending them to the Region Office. ♦ DVIR's will be reviewed by the office Admin. If any items on the DVIR are repeated consecutive days without repairs noted on the DVIR the office Admin will notify the General Foreperson and/or Supervisor of marked items for corrections. ♦ Office Admin will file DVIR's in the equipment file for a period not less than three months. ♦ DVIR's over three months will be removed from the file as needed. **Employees** ♦ All employees are required to perform a tool inspection before each use. ♦ All employees are encouraged to use the HuP Self Check & Peer Check before and during the use of tools. (Especially Fall Protection)

PROCESS OWNERSHIP:
Manager
Supervisor
Region Safety Supervisor
General Forepersons
Crew Forepersons
Crew Members

ROLES AND RESPONSIBLITIES:
All levels of employment, from the Manager through Crew Members, are responsible for their individual roles in the identification of worksite hazards through the Hazard Recognition, Evaluation and Control process.

COMMUNICATIONS:
Communication of recognized hazards is crucial in the success of eliminating worksite hazards for all employees. Whether it is the Crew Forepersons ability to communicate hazards through proper Job Briefings or a Crew Member's involvement in operations that compel them to point out a recognized hazard, total involvement and communication of hazards can't be overstated.

TRAINING:
Training of the various levels of employment in proper Hazard Recognition, Evaluation and Control must be performed through the "Chain-of-Command" in a "Train the Trainer" type format.

- **General Foreperson** - These individuals must be instructed by the Manager, Supervisor and RSS on how to properly conduct the elements of Worksite Analysis process as well as how to train the Crew Forepersons under their supervision to perform the functions required of their position.
- **Crew Foreperson** - These individuals must be instructed by their General Foreperson on how to properly

conduct the Worksite Analysis process that is required of their position.

- **Crew Members** - The Crew Foreperson is responsible for training the Crew Members on their role in the Worksite Analysis process.

TOLLS / REFERENCES:
Job Behavior Observation (JBO)
JBO Summary Reports
Job Briefing Form
Job Briefing Book Tracking
Job Hazard Analysis (JHA)
Equipment & Tool Inspection Form
Fall Protection Inspection Checklist Form
Drivers Vehicle Inspection Report Form (DVIR)
Human Performance (HuP)

5) Incident Reporting, Investigation, Case Management and Follow-Up

When an incident occurs whether there is an injury or not, there must be an investigation to find the true root causes and preventive measures thus avoiding similar incidents.

This requires communication between the injured Employee, Regional Management, Corporate Safety and Risk Management organizations. Use the proper Incident Reporting Flowcharts based on incident severity, using the **Incident Management Guide.**

A thorough incident scene analysis usually reveals many contributing factors that allows or even encourages an employee's action. Such factors may include rushing, taking shortcuts to boost production, using inadequate equipment, or requiring a work practice that is hard for the employee to do safely. An effective **TapRooT™ Root Cause Analysis (RCA)** identifies ways to address every root cause of an incident's causal factor, Lessons Learned are generated for each serious injury & fatality (**SIF**).

Each region shall follow the Incident Management Guide procedures within the stated deadlines for implementing accurate and timely incident investigation and case management for all Events.

Case Management

The Incident Management Guide outlines new procedures for safety reporting and recordkeeping and case management issued by Corporate Safety and Risk Management.

Direct interaction by management significantly influences the outcome of worker compensation claims. Each region shall follow the procedures in the Incident Management Guide.

Incident Reporting, Investigation, Case Management and Follow-Up Implementation Plan

Focus on procedures for analyzing data and developing action plans. Consider how you will monitor and measure requirements as set forth in the **Incident Management Guide.**

Action Items	Minimum Requirements
Event Management	Follow procedures for notifying and reporting Incident & Events using SafetySuite, scheduling investigations, analyzing incidents, developing and implementing action plans and following up. ♦ Region will schedule agenda time during each monthly Region Safety Committee meeting to analyze incident data (OSHA 300 Log, Near Miss/Close Call Log, Incident Investigation reports, etc.…). Action Plans will be developed and implemented for any key or contributing factors to prevent more incidents. Follow-up on all action plans will be tracked and discussed during the following month's Region Safety Committee meeting. Develop an outline communicating what steps to take to encourage reporting near misses. ♦ Region will encourage the reporting of all Near Misses / Close Calls. Additionally, the Region will encourage Near Miss / Close Call reporting during routine crew visits and during Region conference calls. ♦ All Near Misses / Close Calls reported will be tracked on the Region Near Miss / Close Call Log and an analysis will be conducted to identify trends. ♦ The RSS and Supervisors will conduct an analysis of the Near Miss / Close Call Log monthly for discussion during the Region Safety Committee meeting. Corrective action plans will be developed for trends identified to prevent reoccurrence. *Recommendation: Report a summary of all activities in progress during monthly meetings, during the Region Safety Committee and during the weekly General Foreperson conference calls.*

Training	Describe the steps that ensure all supervisory employees have ongoing training in the Incident Management Guide, **SafetySuite** online reporting and **TapRooT™ Root Cause Analysis (RCA).** ♦ All supervision will receive initial training on how to conduct incident investigations. ♦ All supervision will receive additional training whenever there is a change to the procedure or analysis methodology, and refresher training at least every three years. ♦ All new supervision will receive incident investigation training as part of their orientation / mentoring process. ♦ Types of incidents to be investigated. 1. Fatality 2. Loss Time 3. Restricted Duty 4. Property Damage 5. Vehicle Damage 6. Equipment Failures 7. Close Calls / Near Misses 8. Electrical Incidents ♦ Investigations will be conducted by the General Foreperson. The Supervisor and RSS will assist when possible. Region Safety Committee will assist on serious incidents. ♦ Complete all forms in a timely manner. ♦ Start the SafetySuite Entry process within 24 hours of the time of the event. ♦ Upload files and continue to add information in SafetySuite as it becomes available. ♦ Communicate findings of all investigations throughout the region via conference calls, Foreperson meetings and by memos sent to the field. ♦ Stay in close contact with the Risk Management dept. with any new information on open claims.
Records	Describe the procedures for reviewing the accuracy of all Event Records in SafetySuite, and Formal Investigations using the **TapRooT™** Root Cause Analysis and the **Lessons Learned** within the Region. ♦ General Foreperson will submit a completed incident report within 24 hours of the time of the event. RSS or designee will upload the report in to SafetySuite within 24 hours of the time of the event. ♦ General Foreperson will submit completed interview statements and all photos to the Region office within 48 hours of the incident date. ♦ RSS will review all Incident reports for accuracy and ensure the key and contributing factors have been properly identified. ♦ Any action plan developed for a incident will be monitored by the Region Safety Committee and filed with the Incident report when action items have been implemented.
Case Management	Describe how the Region complies with the **Incident Management Guide.** ♦ General Foreperson will initiate the investigation process. ♦ RSS and/or Supervisor will assist in the investigation process. ♦ General Foreperson to accompany injured employee to medical facility and stay with the employee. ♦ General Foreperson to initiate phone contact with off-work employee twice weekly, or more frequently as necessary (documented). ♦ Communicate alternative work job description to employee's physician. ♦ Monthly review with Region Manager and RSS, of active cases, to include employee status, actual cost and reserves. ♦ RSS will review all open claims in SafetySuite monthly or more often if necessary. The monthly open claim corrective action will be completed by the 3rd of every month in SafetySuite.

PROCESS OWNERSHIP:

The Region Safety Committee is responsible for analyzing incidents, implementing action plans, scheduling meetings and any required follow-up.

ROLES AND RESPONSIBILITIES:
Each individual member of the management team's roles and responsibilities are well defined in the Corporate Incident Investigation Policy ***(See Appendix 4)***.

COMMUNICATION:
The prompt and accurate communication of incidents is critical to the future elimination of similar incidents.

- Prompt communication of the incident from the crew to field management.
- Prompt communication from the field management to the Regional Office/RSS, with as much detail as is available at that moment.
- Prompt communication of incident investigation results.
- Prompt communication by the Regional Office, Safety Department and Risk Management Department back to the field in the form of Stand-Downs or policy changes, if warranted.
- Discussion of incident by all Management during Conference Calls, GF Meetings and Region Safety Committee Meetings.

TOOLS / REFERENCES:

- Corporate Incident Investigation Policy.
- SafetySuite
- Corporate Guide to Incident Reporting and Case Management (CGIRCM).

Management Accountability / Responsibility
(Appendix 4)

Regional Manager Accountable

- Establish an atmosphere of value for incident investigation.
- Monitor process and procedures.
- Communicate the value of incident investigating as a learning tool to prevent incidents.
- Assign responsibility for follow-up on recommendations.
- Safety Plans ensure actions are complete.

Supervisor

- Responsible for ensuring all General Forepersons are following the Incident Investigation process.
- Holds General Forepersons accountable for timeliness and completeness of forms and reports.
- Provides support to RSS to ensure Safety Action Plan is complete.
- May be assigned to Region Safety Committee.
- Acts as Managers designee when Manager is unavailable.

Regional Safety Supervisor

- Facilitates the investigative process.
- Subject matter expert on incident investigation.
- Ensures accuracy of investigation team.
- Enters information in to SafetySuite.

General Foreperson

- Reports incidents.
- Secure site.
- Investigates incidents.
- Conducts interviews.
- Completes forms in a timely manner.
- Communicates and reinforces recommendations to the field.

Corporate Clearing House

- Reviews High Exposure incident reports.
- Analyze reports for trends.
- Communicates findings back to all regions.

Regional Incident Investigation Committee

- Regional Manager – or designee.
- Supervisor. (Optional)
- Regional Safety Supervisor.
- Involved General Foreperson.

Regional Incident Investigation Team

- Regional Safety Supervisor.
- Involved General Foreperson.

6) Operational Safety Programs

This element implements a proactive health and safety process that recognizes desired safe behavior and establishes long-term safe work practices.

A successful process for safety management must focus beyond mere compliance and concentrate on managing risk to worker's health and safety along with regulatory compliance issues.

Health and safety management expectations are clearly defined in health and safety policies and standards are used effectively to guide day-to-day operations, behaviors, planning and decision-making.

- Health & Safety Policies are established for required occupational safety programs based on regulatory compliance for the Company.
- Additional safety policies, standards, procedures and qualification standard documents are developed at the corporate and regional to elaborate on and support implementation of the Safety Policy.
- Management determine the scope and nature of the Company's safety program, and
- Sponsors and the Regional Managers allocate resources to provide appropriate services.
- Management develops program goals and establishes functions, programs, procedures, and activities to meet the Company's occupational health and safety goals.
- Health & safety programs effectively control and manage external exposures, including any risks caused by a third party to our Company.

Operational Safety Programs Implementation Plan Define how to manage the following Safety Programs, and action items.	
Action Items	**Minimum Requirements**
Safety Program Development (Corporate)	Include the following in the development of the safety programs: ✓ *The current OSHA Regulations, ANSI and consensus standards.* ✓ *Benchmark industry-wide Best Practices for specific safety programs.* ✓ *Involve all stakeholders and users affected by new safety programs.* ✓ *Develop safety procedures for controlling and managing safety risks, to reduce hazards to the lowest level possible.*
Safety Program Oversight (Region)	Responsible regional management are involved in the implementation and execution of safety policies, standards and procedures affecting their areas of responsibility.
Regional Safety Programs	Specify how the region communicates and trains on regional safety programs: ✓ *Procedures for capturing safety program changes.* ✓ *Communicating and training crews on new safety programs.* ✓ *Identifying opportunities for re-training crews on safety requirements.*

7) Employee Involvement & Recognition

Managing a comprehensive safety program can be a challenge.

A regional safety committee will help manage this element by -

- Providing oversight and integration of the safety management process;
- Developing activities to increase employee safety awareness; and
- Reviewing incident trends and following up.

With significant employee involvement, the region safety committee encourages employees and regional leadership to participate in the creation, implementation and review of the Safety Management Process. The regional safety committee fosters employee ownership in the safety process.

The committee members and functions will need to be reviewed for effectiveness and restructured as necessary.

Safety Recognition

This element implements a proactive health and safety process that recognizes desired safe behaviors and establishes long-term safe work practices.

Rewards for employees who perform safety activities, measurable participation and results, safety for home (Off-the-Job Safety), heightened safety awareness and individual recognition.

The program objective is simple…

Raise safety awareness to reduce the potential of injury. The costs for injuries and non-compliance are high. Injuries do affect us individually and may adversely affect our company's public reputation, and eventually impact our financial results.

The award and recognition processes reinforce safety performance expectations and culture. Poor safety performance is subject to disciplinary action.

Through region's initiatives and programs, the company will realize fewer incidents — ultimately saving money through lower workers' compensation costs, reduced exposure to lawsuits and ultimately will improve employee morale and production.

Employee Involvement & Recognition Implementation Plan Focusing on proactive activities to *support the reduction of injuries.*	
Action Items	**Minimum Requirements**
Regional Employee Safety Committee	Include the following: ✓ *Sustain an Employee Safety Committee (ESC) and define the role field personnel will play.* ✓ *Assign accountability to the members of the committee and present committee recommendations to the region manager.* ✓ *Schedule monthly safety meetings with agendas.* ✓ *Encourage participation by inviting, listening to opposite points of view.* ✓ *Procedures for managing tasks, action plans, and follow-up.* ✓ *Procedures for capturing and communicating the minutes of meetings.* ♦ The Region Safety Committee will meet the third Wednesday of every month. ♦ Meetings that must be postponed due to scheduling conflicts will be held the proceeding Wednesday of the same month. ♦ Some meetings may need to be held via conference call. In such cases the meeting agenda, all reports and other paperwork necessary for the meeting will be shared with the committee members prior to the call. ♦ The Committee will be comprised of; ◊ Manager ◊ Supervisors ◊ RSS ◊ General Forepersons (This will depend on where the meeting takes place. The General Foreperson(s) near the area may be invited). ♦ Each meeting will begin with a Safety Message. ♦ An agenda will be circulated in advance of the meeting. ♦ The RSS will capture the minutes of the meeting. ♦ The Region Manager will chair the meeting; if the Manager is unavailable the RSS will chair the meeting. ♦ Review action items from previous meeting. ♦ Review status of open action plans. ♦ The minutes of the meeting will be documented and will indicate the responsibility of parties for new action items including due dates. ♦ RSS will distribute the meeting minutes to all Committee Members and General Forepersons. ♦ General Forepersons will review and implement corrective action plans developed with their crews. ♦ Supervisor and RSS will follow-up with General Forepersons to make sure all corrective action plans have been implemented and completed. ♦ Recommended meeting duration is one to two hours.
Region Incentive Program	Specify how to communicate and implement the Region's safety incentive program. ♦ The region does not currently have an incentive program.
Safety Activities	List the proactive safety activities the Region will measure. *Some examples:* ✓ *Presenting an exceptional safety meeting.* ✓ *Developing a fire escape plan for employee's home.* ✓ *Participating in incident analysis and finding root causes.*

	✓ *Reporting a near miss and providing corrective action(s).* ✓ *Developing articles for the Region Newsletter.* ♦ Any employee making formal written safety suggestions or safety improvements accepted by the Region Safety Committee will receive a Safety Award. ♦ Manager, Supervisors and RSS may ask safety related questions of employees during random crew visits and distribute safety awards as a means of recognizing exceptional safety knowledge.
Rewards / Recognition (Employees)	Specify how to reward or acknowledge all levels of employees, including the supervisory employees — for completing proactive safety activities. *Recommendation:* *Include the means for recognizing the accomplishment of key milestones and stretch objectives/goals (not tied to safety rates). For example:* ✓ *Recognition of employees in the region for completing a proactive safety activity.* ✓ *Having a special breakfast or dinner for achieving a proactive JBO metric.* **Tree Felling** ♦ If an employee can take the RSS through the Five Steps of Tree Felling step by step flawlessly the employee will receive a Top-Notch T-shirt.

PROCESS OWNERSHIP:
Region Manager, with assistance from the Regional Safety Supervisor will manage the Safety Committee.
Region Manager is responsible for implementation of all Safety Recognition Programs.

ROLES AND RESPONSIBILITIES:

- The Chairperson will be responsible for the implementation and maintenance of the Safety Committee.
- Each Committee appointee will monitor, analyze and advise the chairperson on all matters pertaining to his/her assigned element.
- The Regional Manager will assign each Committee member's an assigned element for the calendar year:
    1. Management Leadership & Commitment
    2. Communication & Safety Suite Documentation
    3. Assessments, Audits & Continuous Improvement
    4. Hazard Recognition, Evaluation & Control
    5. Incident Reporting, Investigation, Case Management & Follow-up
    6. Operational Safety Programs
    7. Employee Involvement & Recognition
    8. Motivation, Behavior & Attitudes
    9. Training & Orientation
    10. Statistical Reporting & Trend Analysis

- Each Committee member will come prepared to report any conclusions, findings, key indicators or concerns for their respective assigned element(s).

Region Element Lead Assignments

Chairperson:	Bobby King	Element Assigned:	Management Leadership & Commitment
Co-Chairperson:	Bill Johnson	Element Assigned:	Communication & Safety Suite Documentation Incident Reporting, Investigation, Case Management & Follow-up Statistical Reporting & Trend Analysis
Committee Member	Jeff Holder	Element Assigned:	Operational Safety Programs Motivation, Behavior & Attitudes
Committee Member	Mike King	Element Assigned:	Assessments, Audits & Continuous Improvement Hazard Recognition, Evaluation & Control

Committee Member	JJ Brown	Element Assigned:	Employee Involvement & Recognition Training & Orientation

COMMUNICATION:
To encourage safety awareness and increase employee morale, the Region Safety Committee will communicate the efforts, progress and conclusions of this committee regarding safety issues and policy changes to employees by utilizing, but not limited to, the following:

- Discussions during field visits
- Safety Committee Meeting Minutes
- Safety Conference Calls
- Foreperson / All Hands Meetings

All employees will be encouraged to play a role in the development of new safety ideas and initiatives.

TRAINING:
All members of this Committee have been provided a copy of the SMP manual and have been assigned their roles and responsibilities within the Committee.
All new members will receive an orientation from the Chairperson and or Co-Chairperson to bring them up to speed with the purpose and activities of the Region Safety Committee.

TOOLS / REFERENCES:

- The Safety Management Process Book
- Safety Conference Call Minutes
- Safety Committee Meeting Agendas
- Safety Committee Meeting Minutes

8) Motivation, Behavior and Attitudes

Human Performance

A majority of general industry incidents (over 90%) are caused by **at-risk behaviors**. Injuries can be reduced by reinforcing safer behaviors. This element focuses on the motivation, behaviors, and attitudes of employees while performing their work.

Motivation gives Employees the awareness, interest and willingness to increase safety efforts and support organizational safety goals and objectives.

Motivation commonly focuses on changing behaviors and attitudes; it is generally defined by these three factors:

1) Direction of behavior,
2) Intensity of action,
3) Persistence of effort.

An organizational behavior model includes reinforcement and feedback. It is used to modify at-risk behaviors and adjust employee attitudes in the workplace. This will yield higher morale, higher production and better quality of work.

Visible management leadership is key to change employee attitudes and behaviors.

Motivation, Behavior and Attitudes Implementation Plan Focus on proactive behaviors which *reduce the safety risk of employee decisions and actions.*	
Action Items	**Minimum Requirements**
Proactive (Leading Indicator) Safety Activities	List the proactive motivation, safety behaviors and attitudes, which the Region will measure. *Activities to measure:* ✓ *Willingly engage crews in meaningful safety meetings.* ✓ *Coach employees to present a safety topic to their peers.* ✓ *Actively report near miss events and participate in incident investigations.* ✓ *Develop an exceptional action plan from Job Behavior Observation data analysis.* ✓ *Monitor positive contributions, recognize safe behaviors and reward accordingly.* ✓ *Demonstrate **visible** leadership & commitment to employee improvement and buy-in to safe behaviors.* ✓ *Demonstrate Human Performance tools (HuP). Demonstrate examples in the field.* ✓ *Innovate an off-the-job safety program (like a tornado shelter-in-place).* ✓ *Consistently and correctly set up tools, equipment and worksites as per the LCQS.*
Reactive (Lagging Indicator)	✓ *Describe how the Region Management will manage the review of Performance Notices in SafetySuite.* ✓ *Analyze Human Performance traps (HuP) with the Field Crews. Communicate overall HuP unsafe trends and results to correct unsafe employee behaviors.* ✓ *Coach and involve non-performing employees by building an environment of trust, respect and by fostering a desire to learn correct job methods and improve.* ✓ *When others need help provide coaching, resources, support and assistance.*

9) Training & Orientation

The critical element for a successful safety program is effective job orientation and health & safety training. Ensuring employees are properly trained and continually re-engaged with the safety rules and procedures is the cornerstone of our organization.

Education and training are especially critical for employees who assume new duties. This is reflected by the high injury rates among all workers who are newly assigned to their tasks.

Employee training is the responsibility of management. For our organization to achieve its objectives, employees need to perform at a certain level. To achieve a satisfactory level of performance, management established worker-training policies, which in turn lead to solid qualification and training programs.

A comprehensive training program must include the development of General Forepersons. The GFs are especially important in health and safety protection since they are directly responsible for their workers and job tasks. Effective development of the GFs emphasizes their responsibilities in health and safety management and informs them about recognizing hazards, preventing hazards, and responding to emergencies.

Elements of employee orientation and training include:

- HR policies for hiring and orientation.
- Documented HR criteria for promotion.
- Continuous learning and training for all employees.
- Corporate training modules (such as Work Zone Safety and Driving Safety).
- Identifying training topics that require a certification program.
- A process to ensure certification programs are implemented correctly.
- Regular safety meetings and observed and rated for effectiveness.
- Regulatory compliance tracking and auditing.

Training / Orientation Implementation Plan	
Action Items	**Minimum Requirements**
Orientation, Hiring, and Promotions	Develop details for interviewing and selecting new employees, listing hiring criteria and qualifications for promotions based on HR Policies. **Interviewing / Hiring Procedure** The following Interviewing / hiring procedures will be followed when hiring new employees in Region 059. 1. General Foreperson post available positions on BirdDog Hiring Agent. 2. Applicants make initial employment request by applying online at asplundh.ourcareerpages.com. 3. General Forepersons will schedule and conduct a face to face interview. 4. Complete Pre-Employment Interview Checklist. 5. If hired the GF shall create a hiring packet on E-Hire. 6. New employee shall complete the E-Hire process. 7. GF is required to complete all required information/documentation in the employee hiring packet that's not covered in E-Hire. **Documentation to be kept in Region Office Files** 1. Copy of Valid Driver's License or Photo Id. 2. On Site Drug Testing Form Non-DOT 3. Authorization for Motor Vehicle Report 4. Professional Driver's File Implement the safety orientation process for new employees, for newly promoted employees, Forepersons, and General Forepersons. Include the New Employee LCQS Safety Orientation **(NELO)** in the training process. **Orientation Process** – The following orientation process must be completed for all new employees, newly promoted employees, Crew Forepersons and General Forepersons. **Orientation of New Employees** ♦ All new employees shall view the New Employee Orientation Video during the E-Hire process and sign-off verifying their viewing. ♦ All new employees shall view the Electrical Hazard Awareness Training Video during the E-Hire process. ♦ All new employees will receive Blood Borne Pathogen Orientation. ♦ All new employees will receive Hazard Communication Orientation. ♦ Complete Region 059 E-Hire process. ♦ Review Region Policy Manual. ♦ General Foreperson will distribute a copy of the Line Clearance Qualification Standard LCQS (NELO Qualification begins on first day of employment). **Newly Promoted Employee** ♦ LCQS outline for current class complete. ♦ General Foreperson interview to explain new roles and responsibilities. ♦ Review job description for new classification. **Note:** All items to be completed BEFORE promotion. **Newly Promoted Crew Foreperson** ♦ LCQS outline for current class complete. ♦ General Foreperson interview to explain new roles and responsibilities. ♦ Review job description for new classification. ♦ Complete the New Foreperson Safety Orientation Program. • Lesson 27 of the Foreperson LCQS shall be completed before the new Foreperson can oversee a crew. **Newly Promoted General Foreperson** ♦ RSS conducts New General Foreperson safety orientation to explain new roles and

	responsibilities. ♦ RSS will put the new GF through the DMP Train the Trainer program. * ♦ RSS will put the new General Foreperson through Incident Investigation Training. * ♦ New General Foreperson will complete the General Foreperson Mentoring Program. (See Management Training Section of this Element) ** **** To be completed within 1 week of promotion.*** ***** Mentoring program to be completed per Management Training Section of this Element***
Training Modules	Ensure the Crews follow the **LCQS Training Guide** to consistently and effectively train on key work tasks, such as tree felling, work zone safety, First Aid & CPR, aerial rescue. **LCQS Training** ♦ See Appendix A of any LCQS Booklet. **Tree Felling Training** ♦ All General Forepersons will attend a Tree Felling Train-the-Trainer Course at the earliest scheduled course after promoted. ♦ All employees that fell trees will be trained in the five steps of tree felling before they will be allowed to fell trees. **Work Zone Safety Training** ♦ All new employees will receive training in Basic Work Zone Traffic Control & Flagger training. Wallet cards will be distributed to employees at the completion of training. Documentation of training will be kept at the Region Office. **Basic First Aid / CPR Training** ♦ Region Policy requires a minimum of one person per crew be trained in First Aid / CPR and all new employees be trained in First Aid / CPR within 90 days of their hire date. **Aerial Rescue Training** ♦ All employees will be trained in tree or aerial lift rescue procedures a minimum of once each month. Documentation sign-off sheets verifying participation / training will be maintained on each crew for a period of 12 months. General Foreperson will also perform a monthly review of the policy and procedures with each crew and send the sign-off sheet to the Region office. Use Driver Management Program (DMP) to improve Driver Safety. **DMP Driver Safety Training** ♦ All new drivers shall have new Motor Vehicle Report (MVR) and Region Office approval to drive company owned or leased equipment. ♦ All employees that drive company vehicles shall complete the Driver Management Program (DMP) prior to operating a company owned or leased vehicle. ♦ All drivers shall be recertified/retrained in the company Driver Management Program annually. ♦ All drivers shall be re-trained if their Motor Vehicle Report (MVR) points score exceeds two (2) points. ♦ All drivers shall be disqualified from driving a company owned or leased vehicle for a period of one year if their Motor Vehicle Report (MVR) points score is 4 or 5 points. ♦ A driver will be disqualified from operating company owned or leased vehicles if their Motor Vehicle Report (MVR) points score is six (6) points or higher.
Certification / Proficiency	✓ Check and verify the steps in the **LCQS Proficiency Book** are complete; ✓ Employees are knowledgeable and trained in current or new work practices and are qualified to use tools and equipment in the field. **Line Clearance Qualification Standard (LCQS)** ♦ Federal Regulations for General Industry Standard 1910.269, of the Occupational Safety and Health Administration (OSHA), requires that employees involved in the maintenance of electric power generation, transmission, and distribution systems must be trained in all aspects of their work responsibility and the training must be certified. ♦ This Qualification Program will be administered by the Company. Crew

	Forepersons, General Forepersons are responsible for coordinating the Qualification Program activities and audit individual Crew Foreperson performance and employee progress. **Regional Management Program Administration** ♦ Region Managers are responsible for administering the Certification Program within their assigned regions. Region Managers, or their assigned designee, are responsible for administering the testing for the General Forepersons. Crew Forepersons and General Forepersons, under the direction of the Regional Manager, are responsible for the certification process and monitoring employee's progress on an on-going basis. ♦ General Forepersons are responsible for conducting tests of employees at the completion of each program job designation outline (Proficiency Checklist). Completed proficiency checklists and test results are to be made parf of each individual employee's file and serve to document the Company employee training certification. ♦ Crew Forepersons are responsible for the training of all new employees. Once a training program segment is completed and the employee has demonstrated that they are proficient in the job requirements, the Crew Foreperson shall notify the General Foreperson. At this time, the General Foreperson shall administer that part of the testing program that pertains to that employee's level of completed training (i.e., Groundperson, Ground Trimmer, Climber Trimmer, Bucket Operator and Specialized Equipment Operator. ♦ A copy of a Proficiency Checklist shall be signed by the employee and placed in the employee's file to reflect the employee's intention to complete the job designation certification. ♦ All testing documents, including those that show a passing and/or failing grade shall be retained in the employee's personnel file at the Regional office for one year following separation of the employee. ♦ **Note:** See Line Clearance Qualification Standard for details regarding specific work practices and tools used in the field.
Safety Meetings and Training	Conduct, track and review the effectiveness of **Weekly Safety Meetings** with the crews. *Recommendation: Check in a few days later – asking the crews what the topic was.* **Safety Meeting and Training** ♦ The Forepersons are required to review the Weekly Safety Meeting Booklet (WSMB) Topic with their Crew Members each week. They must have their Crew Members sign the WSMB as documentation they reviewed and understand its content. Forepersons are required to maintain a notebook with the most recent 12 months of weekly safety letters. ♦ General Forepersons are required to verify Forepersons are effectively delivering WSMB topics and training publications to crew employees each week by verification of content retention through discussions with employees. After verification is made the General Forepersons are required to maintain a signed copy of the WSMB in their OSHA Notebooks for a period of twelve months. ♦ The RSS will also verify Forepersons compliance as part of his field audit process. ♦ OSHA Notebooks will be reviewed by Supervisor and or RSS during Crew Foreperson meetings when attended.
Regulatory Compliance Tracking	✓ Review and manage OSHA regulatory training, recordkeeping and compliance files. ✓ Review safety audit corrective actions, to meet the corporate criteria. ✓ Capture data and generate reports from SafetySuite, to identify and track and escalate action items until complete. The Region has established a database for tracking Personnel files, Qualification files, Drivers Qualification, and Driver Investigation History File training documents. The process for managing this data is as follows: ♦ Documents will be collected by the General Forepersons during the hiring process, orientation process, during the qualification process and throughout an employee's training and sent to the region office for filing.

	♦ Region office will input data into the Employee File Tracking data base. ♦ Region office will maintain employee's Personnel files, LCQS Qualifications, Drivers Qualification, and Driver Investigation History Files. ♦ Region office will send each General Foreperson a copy of the File Tracking Data base pertaining to their employees monthly with missing or expired items flagged for their review and follow-up to assist with maintaining compliance of missing or dated materials such as currant Driver's License, DOT Medical Card, First Aid / CPR and other materials that are required that have expiration dates. ♦ Region office will generate electronic copies of the Regions File Tracking Data base monthly with all missing or expired items flagged for the Manager, Supervisor and RSS review and follow-up.
Management Training	Comply with the corporate policy on General Foreperson Personal Development Program training school and the **General Foreperson LCQS**. **Asplundh Supervisory Training Program School** ♦ After completion of General Foreperson Mentoring Process. ♦ After completion of GFLCQS. ♦ After new General Foreperson becomes salary, they will become a candidate for "General Foreperson School" and the field Personnel dept. shall be notified. **General Foreperson Personal Development Program Training School** ♦ General Foreperson will become a candidate 3 years after completing "General Foreperson School" and the field Personnel dept. shall be notified. ♦ All training school scheduling is conducted by the Home Office. ♦ After completion of "General Foreperson Personal Development Program Training School" a copy of their completion certificates shall be kept in their personnel file. **General Foreperson Mentoring Policy** ♦ All Vice Presidents and Region Managers shall comply with the following General Foreperson Mentoring Policy. The purpose of the policy is to bring the safety management skills of new General Forepersons up to company standards. The Field Personnel Department will notify the Region Manager of the completion requirements when a new General Foreperson enters the system. a. The first ½ day for the new General Foreperson will be spent entirely with the Region Manager to ensure that clear expectations are communicated. b. The following three days will be spent with the Region Safety Superintendent to receive training and education regarding the four safety objectives: observation and appraisal, on the job training, inspection and maintenance of equipment and tools, and compliance with manuals. c. The next five days will be spent riding with an experienced General Foreperson within the region so that the new General Foreperson can observe and gain knowledge. d. Upon completion of the above three steps. The new General Foreperson will spend at least 5 days with the Supervisor or Region Manager during the next 60 day so that they can assess and evaluate the attained skills. e. After the first six months, the Region Manager will meet with the new General Foreperson to evaluate the new General Foreperson's performance. ♦ The benefits of this program will be better-trained General Forepersons and fewer employee injuries. ♦ You will be required to return the General Foreperson Mentoring Policy Sign-off Sheet to the Field Personnel Department upon completion.

PROCESS OWNERSHIP:
Manager
Supervisors
RSS
Region Office Staff
General Forepersons
Crew Forepersons

METRICS:
Data Tracking Program
Periodic Reviews by Management

ROLES AND RESPONSIBILITIES:
Manager - Will monitor the progress of training and orientation during the quarterly Employee Safety Committee Meetings.
Regional Safety Supervisor - Will monitor training and orientation in the field to insure consistency of process.
Supervisor - Will monitor the General Foreperson`s documentation and progress in the field.
General Foreperson - Is responsible for the implementation of the actual training and orientation at the crew level.
Crew Foreperson - Is responsible for On-The-Job Training and orientation of the Crew Members under their supervision.

TRAINING:
Training of field management in the proper method of implementing the Training / Orientation Process will be accomplished through the following methods:

- Annual GF Meetings
- Weekly Conference Calls
- Foreperson Meetings
- Crew Member "All Hands" Meetings
- On-The-Job Training by Manager, Supervisors, RSS and GF

TOOLS / REFERENCES:

- E-Hire Hiring Packet Process
- Decision Driver Video
- Safety Suite
- VPP Program
- Data Tracking Program
- Line Clearance Qualification Standard (LCQS)
- Regional Policy Manual

10) Statistical Reporting and Trend Analysis

A key part of managing safety is to measure the effectiveness of safety performance and work processes. Leading and lagging indicators shall be analyzed to determine trends and patterns so management can take appropriate prevention measures.

Each month, Corporate Safety and Risk Management Departments will send to designated management personnel a status report on health and safety Key Performance Indicators (KPI) for incidents and workers' compensation costs — grouped by Sponsor, region, and overall company. A comprehensive trend analysis is performed to identify high incident trends that need corrective action(s).

The region is also responsible for producing and reviewing certain reports such as: JBO and Motorist Observation Reports (MOR).

Safety and Risk Management Key Performance Indicators

Incident, Frequency, and Severity Statistics: a company metric using OSHA's classifications for injuries.

TCIR: Number of OSHA-recordable injuries x 200,000 divided by work hours for a certain time period.

LTIR: Number of OSHA lost-time injuries x 200,000 divided by work hours for a certain time period.

Severity: Number of Days Lost x 200,000 divided by work hours for a certain time period.

DART: Days Away, Restricted or Transferred cases — a term used to describe or group injuries that resulted in days away, restricted, or transferred job duties. This is a term used by OSHA to group the more serious injuries in one category.

Statistical Reporting and Trend Analysis Implementation Plan	
Action Items	**Minimum Requirements**
JBO Reports (Leading Indicator)	Describe how management reviews and manages minimum reporting requirements of the Job Behavior Observation Policy. Focus on identifying key concerns and make recommendations to address high at-risk behavior(s). **JBO Summary Reports** ♦ Once a month the JBO summary report will be compiled and sent to all supervision for review. ♦ One JBO report will indicate the number of JBO's performed by each member of supervision and the other report will indicate the percentage of Safe vs. Improvement Needed. ♦ The Region Safety Committee will review JBO`s focusing on identifying key concerns, Safe vs. Improvement Needed trends, etc. Region Safety Committee will make recommendations to address high risk behavior through development of corrective action plans as necessary. ♦ RSS will review JBO data on the safety conference call. ♦ RSS will update the JBO Manager Review Corrective Action on Safety Suite by the 6th of every month.
Incident Investigations (Leading & Lagging Indicators)	✓ Review incident investigation reports and Event Records in SafetySuite, ✓ Confirm all contributing factors, and ✓ Develop action plans with a follow-up procedure. **Incident Investigations** ♦ The Region Safety Committee/ Incident &Investigation team is responsible for investigation of incidents involving employee injury to make sure that all appropriate documentation is complete and filed and to identify key and contributing factors and develop action plans that address these factors. ♦ Incidents will be entered into Safety Suite by the RSS. The process will be started within 24 hours of the time of the incident and more information / details will be added as it's obtained. ♦ The Incident / Near Miss Log will be reviewed at the Region Safety Committee meeting. Near Misses will be reviewed and analyzed for trends. Key and contributing factors will be identified and action plans developed that address these factors. ♦ The Incident / Near Miss Log will be sent to all supervision the first week of every month. ♦ Updates on all open claims and action plans will be reviewed as a follow-up procedure during the Region Safety Committee meeting.
Motorist Observation Reports (MOR) (Lagging Indicator)	✓ Review the Motorist Observation Reports (MOR). ✓ Define steps for managing repeat offenders. ✓ Document coaching and counseling sessions. ✓ Develop training materials to address high at-risk behaviors. **Motorist Observation Reports** ♦ MOR reports will be reviewed during the Region Safety Committee meeting. The objective of the review will be to identity possible trends and repeat offenders. When trends are identified, the Safety Committee will develop training material or programs to address high risk behavior. ♦ MOR's for drivers involving speeding the driver is required to be on a conference call and explain the MOR. ♦ Repeat offenders will be managed in accordance with Region Motorist Observation Policy. **(See Appendix 5)**.

	♦ The Supervisor and RSS will schedule and conduct employee counseling at the direction of the Region Manager in regard to any complaints reported to Safety First. ♦ RSS will maintain a MOR Log and high-light repeat offenders on the log. ♦ RSS will send the MOR Log to all supervision the first week of every month.
Safety Metric Monthly Reports (Lagging Indicator)	Describe the steps for reviewing monthly reports, evaluate safety results, identify trends, and develop action plans with a follow-up procedure. **LCPH Report / YTD Loss Run Report / 3 ½ Year Loss Run Report** ♦ The LCPH Report / YTD Loss Run Report / 3 ½ Year Loss Run Report will be reviewed during the Region Safety Committee meeting. The objective of this review will be to compare the results with previous month's reports, identify trends and to develop action plans as necessary. ♦ Minutes of the Region Safety Committee meeting will be distributed to all General Forepersons so they can address corrective action plans developed with their crews. ♦ Supervisor and RSS will follow-up with General Forepersons to make sure all corrective action plans have been implemented. **Performance Notice Reports** ♦ The RSS will run a report every month and send to all supervision. ♦ RSS will use those reports for review during the Region Safety Committee meeting. The objective of the review will be to conduct an analysis for trends and similar infractions throughout the Region. ♦ A corrective action plan will be developed to address any trends identified. ♦ Minutes of the Region Safety Committee meeting will be distributed to all General Forepersons so they can address corrective action plans developed with their crews. **OSHA 300 LOG** ♦ The OSHA 300 Log will be reviewed monthly for accuracy and inconsistency. If there should be any inaccurate information on the OSHA 300 Log it will be corrected. ♦ RSS will update the OSHA 300 Log Corrective Action by the 3rd of every month.

PROCESS OWNERSHIP:
The Region Safety Supervisor, Supervisor and General Forepersons with assistance from the Region Manager.

METRICS:
Listed below are lists of reports that will help measure the effectiveness of the process.

- JBO Summary Report
- Incident Investigation Log
- Motorist Observation Report
- LCPH Report
- YTD Loss Run Report
- 3 ½ Year Loss Run Report
- Performance Notice Report
- OSHA 300 Log

ROLES AND RESPONSIBILITIES:
It will be the responsibility of Region Safety Supervisor, as lead, with the assistance of the Region Manager. The Region Safety Supervisor will be responsible for compiling the reports and presenting to the Region Safety Committee for review.

COMMUNICATIONS:
Action Plans developed during Region Safety Committee meetings will be communicated to the field through Supervisor, General Forepersons utilizing Region Safety Committee meeting minutes.

TRAINING:
The Region Safety Committee will develop action plans as warranted. The Supervisors will see that the GF's train or retrain the employees as required.

TOOLS / REFERENCES:

- JBO Summary Report
- Incident Investigation Log
- Motorist Observation Reports
- LCPH Report
- YTD Loss Run Report
- 3 ½ Year Loss Run Report
- Performance Notice Report
- OSHA 300 Log

REGIONAL POLICY FOR MOTORIST OBSERVATION PROGRAM

(Appendix 5)

Motorist Observation Reports are reviewed immediately as they come in, at which time they are recorded into an excel program by office personnel and analyzed for trends and repeat offenders. The excel program consist of the following:

- Date received
- Vehicle number
- Location
- Driver name
- Action taken by Management
- Date action is completed
- Date sent back to Safety First

The review will go as follows:

1. Management is notified and informed whether or not this is the first offense.
2. Office Personnel contacts General Foreperson with information contained in MOR and request any further information.
3. MOR is then e-mailed to General Foreperson to review with employee.
4. The Driver signs off and gives his response.
5. General Foreperson e-mails back to Regional Office within three days.
6. Management then decides on an Action Plan and signs off on the MOR.
7. Office personnel will then e-mail the MOR back to Safety First.

Each MOR is reviewed on an individual basis and the Action Plan is based on the findings after all the facts are in.

The third Wednesday of every month the Safety Committee will meet to make sure all Action Plans have been complete.

Safety Management Process Overview Checklist

This Overview Checklist will track progress on developing a Region's SMP.

1. **Management Leadership & Commitment** — Develop and implement a process to manage:
   - ❑ Roles and responsibilities for all levels of management, including the regional safety management.
   - ❑ Communicating and enforcing safety standards in your region.
   - ❑ Reviewing and updating the Region Policy Manual, including a method for noting last revision and review dates.
   - ❑ Action plans with proactive safety activities for each member of management.
   - ❑ Tying compensation to accomplished proactive activities and/or goals.
   - ❑ A performance review process with emphasis on coaching, mentoring and educating employees.

2. **Communication & SafetySuite Documentation** — Develop and implement a process to manage:
   - ❑ Delivery of Safety Messages and Lessons Learned from Events.
   - ❑ Communication of the Safety Vision, Policy and Principles.
   - ❑ Communication of Incident & Event Reports / Safety Alerts / Safety Stand-downs.
   - ❑ Meaningful conference calls and dialogue with General Forepersons / Forepersons.
   - ❑ Development and distribution of the Region Newsletter to Employees.

3. **Assessments & Audits and Continuous Improvement**— Develop and implement a process to manage:
   - ❑ Participation in Audit Process, including Field observation, opening and closing conference.
   - ❑ Development of corrective action plan with due dates.
   - ❑ Follow-up and verification of Action Plan items, to achieve desired risk reduction.

4. **Hazard Recognition, Evaluation & Control** — Develop and implement a process to manage:
   - ❑ Monitoring and measuring JBO completion and trending unsafe behaviors.
   - ❑ Training and monitoring the effectiveness of Job Briefings.
   - ❑ Maintenance and DOT regulatory inspection, for equipment and tools (aerial lift, DOT, etc.).

5. **Incident Reporting, Investigation, Case Management and Follow-Up** — Develop and implement a process to manage:
   - ❑ Scheduling meetings to analyze events, incidents. Develop and implement action plans.
   - ❑ Training new supervision on event reporting, incident investigation and recordkeeping using the IMG.
   - ❑ Completing accurate Event Records in SafetySuite and TapRooT Reports on SIFs and potential SIFs.

6. **Operational Safety Programs —** Develop and implement a process to manage:
   - ❑ Conducting a gap assessment for safety compliance.
   - ❑ Training on all applicable safety programs, documenting all attendees.
   - ❑ Using SafetySuite to analyze reports and ensure training compliance.

7. **Employee Involvement & Recognition —** Develop and implement a process to manage:
   - ❑ A Regional Safety Committee.
   - ❑ Safety meetings with agendas and tracking follow-up actions.
   - ❑ Regular review of key indicators, leading to action plans.
   - ❑ Assigning elements of the SMP to committee members.
   - ❑ Measurable safety activities, milestones and recognition of employee safety excellence.

8. **Motivation, Behavior and Attitudes —** Develop and implement a process to manage:
   - ❑ Measuring proactive behaviors of employees using Human Performance (HuP) tools.
   - ❑ Proactively coaching, mentoring and modifying unsafe behavior trends.

9. **Training and Orientation —** Develop and implement a process to manage:
   - ❑ Orientation, hiring and promotion procedures.
   - ❑ Ensuring consistent and effective training on work tasks.
   - ❑ Training employees according to the NELO, LCQS, and all work practices and tools.
   - ❑ Conducting safety meetings and training.
   - ❑ Tracking regulatory compliance files.
   - ❑ Implementing the General Foreperson LCQS Program.

10. **Statistical Reporting and Trend Analysis —** Develop and implement a process to manage:
   - ❑ JBO performance indicators using SafetySuite reporting tool.
   - ❑ Trending Incident investigation reporting and performing analysis using SafetySuite.
   - ❑ Motorist Observation Reports completion rate.
   - ❑ Trending Performance Notice completion.
   - ❑ Statistical Safety Rates (TCIR, LCIR, Severity and DART).

Corporate Safety Vision, Policy and Principles

VISION

SAFETY FIRST... NO ONE GETS HURT! ®

POLICY

To provide each employee with a safe place to work, free from all recognized hazards.

PRINCIPLES

- All injuries are preventable.
- No job or activity is worth risking injury.
- Working safely is a condition of employment.
- Management is responsible for providing the environment for everyone to work safely.
- Each individual shares in the responsibility for the safety of themselves and others.
- We believe prevention of injuries is good business.
- We promote off-the-job safety for our employees.
- Safety is led by senior management, implemented by line management, with each level accountable to the one above and responsible for the one below.
- We design and integrate safety into our management decisions.

In support of the Safety Policy, the following process is in place:

Insert for the Region Policy Manual

To help keep our Safety Vision, Policy and Principles foremost in everyone's mind, each vehicle's Region Policy Manual will have a copy of our Safety Vision, Safety Policy and Principles. The Safety Policy is made available to external stakeholders.

Health and Safety Responsibilities

Corporate Safety is responsible for the development of the corporate safety program. Responsibilities for implementing the program are directed by the Sponsor through the Region Manager, Regional Safety Management, General Foreperson, and each Foreperson, establishing safety as an integral part of crew operation. The following are established specific safety responsibilities for management and field personnel:

SPONSOR

1. Participates in the development of corporate safety policy and communicates policy to Region Managers.
2. Directs the implementation of company safety policies and procedures.
3. Directs the development of employee safety education as well as formal disciplinary programs.
4. Evaluates the quality and effectiveness of Region Manager's safety programs.

CORPORATE SAFETY

1. Develops safety policies for the company.
2. Directs and coordinates corporate safety audits and action plans.
3. Monitors and ensures compliance with regulatory agency health and safety requirements.
4. Publishes safety alerts, lesson learned and other safety-related materials.
5. Assists with the development and communication of "best practices" regarding safety.
6. Develops safety training material, Line Clearance Qualification Standard (LCQS).
7. Directs the investigation of fatalities and serious injuries.
8. Coordinates with region management in the implementation and ongoing management of the SMP.

REGION MANAGER

1. Implements company safety policies and procedures as directed by the Sponsor.
2. Develops safety standards and expectations for the region.
3. Communicates safety responsibilities to: Region's Supervisors, Safety Management and General Forepersons.
4. Implements the employee safety programs and written disciplinary programs.
5. Ensures the initiation and review in SafetySuite of all GF Incident Investigation Reports and Event Records within 24 hours (injuries/illnesses, motor vehicle incidents, property damage, auto, general liability, fires, and environmental spills).
6. Tracks the corrective actions to completion for all events with root causes.
7. Manager or designee reviews General Foreperson's OSHA Notebook on a quarterly basis.
8. Implements a routine inspection process for personal protective equipment (PPE), tools, to ensure equipment satisfy company standards.
9. Ensures an annual inspection of aerial lift units by a qualified inspector.
10. Evaluates the Region's Supervisors, Safety Management and General Forepersons safety performance.
11. Implements the review process for motor vehicle reports (MVR), MORs and periodic review of operator licenses using the Driving Management Program (DMP) for all employee company drivers. The review frequency includes new employees at time of hire, all others annually or more frequently based on the DMP.

REGIONAL SAFETY MANAGEMENT

1. Implements company safety policies and procedures as directed by the Region Manager.
2. Implements safety standards (i.e. the LCQS) as the subject matter expert in the region.
3. Mentors line management when implementing safety programs; and when using the Incident Management Guide to investigate events; and during GF and Foreperson crew safety meetings.
4. Facilitates safety meetings, and regional conference calls. Participates in corporate safety meetings.
5. Adds value to the safety management process by being present and available, as a safety resource.
6. Reports on the regional safety audit findings and the status of corrective actions to management.
7. Participates and coaches personnel on meaningful JBOs, and identifies opportunities for improvement.
8. Communicates safety management responsibilities to General Forepersons and Forepersons.

GENERAL FOREPERSON

1. Implements the company's safety program as directed by the Manager/Supervisor.
2. Ensures that Forepersons and crewmembers are properly trained in company safety practices, the proper use of tools and equipment, and work procedures.
3. Communicates the company's safety policies to Forepersons and clearly defines Foreperson safety responsibilities.
4. Uses the weekly safety meeting books for evaluating employee safety-training programs and compliance with safe work practices.
5. Audits crew operations for compliance with safety rules. Inspects tools and equipment on a routine basis.
6. Ensures that all required manuals and other documents are maintained on company vehicles.
7. Investigates incidents as required by company policy.
8. Disciplines employees according to region policy.

CREW FOREPERSON

1. Implements company safety policies and procedures as directed by the General Foreperson.
2. Trains crewmembers in company safety policies and work procedures.
3. Performs a jobsite hazard evaluation and required pre-work job briefing for each worksite.
4. Observes work activity on the job, coaches employees to correct unsafe acts and/or conditions.
5. Inspects and maintains equipment and tools as required by company policy.
6. Meaningfully explains the weekly safety meeting topic, and safety communications.
7. Provides emergency procedures to crew personnel.
8. Reports incidents immediately to the General Foreperson and collaborates with incident investigations, and written reports as required.
9. Disciplines employees violating safety rules according to region policy.

Overview & Summary

Line Clearance Qualification Standard (LCQS)

The Company Training Philosophy

The company's philosophy breaks from the traditional classroom-based training and has adopted a more direct, hands-on training methodology. This methodology is based on blending operational work practices with knowledge and safety while on the job.

Our Company philosophy is driven on the basis that an individual's proficiency, both in skill and knowledge, is a better measure of success than time spent in class. Today, 90% of the Company's training occurs in the field at the work site while the employee is on the job.

We have developed the Line Clearance Qualification Standard Program that is directed specifically at developing an employee's skills in compliance with Company policies and industry's work practices, as well as OSHA rules and regulations. The key requirement to becoming qualified in any job class is the employee's ability to demonstrate proficiency in the skills needed to perform their job tasks.

Common work practices are not acceptable when working in the field of vegetation management unless they have proven themselves to be the *right* work practice. Every work practice has been reviewed and analyzed and now incorporates "Safety-First" practices interwoven with the *correct* work practices for a specific task, and together they create the Company's and our industry's best practices, all which are aligned with ANSI standards and OSHA and NIOSH regulations.

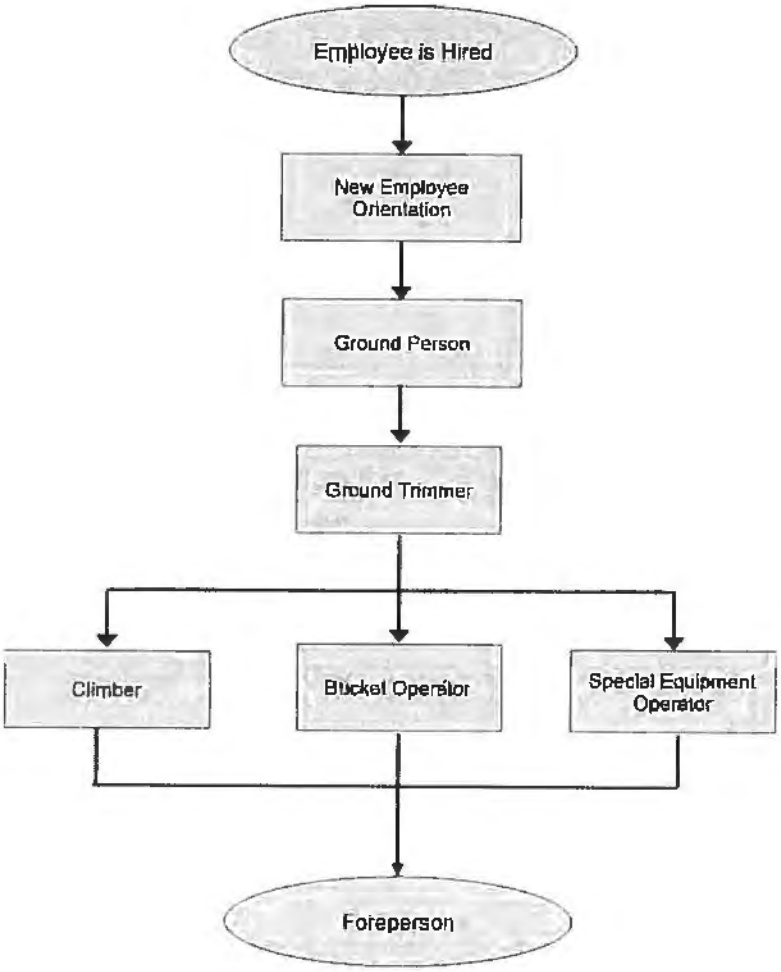
Our training approach has measurable goals and proven results:

- Substantially improving an employee's knowledge and skill
- Dramatically increases employee productivity
- Significantly reduces the number of on-the-job injuries
- Tangible saving, both in on-the-job injury loss of productivity, as well as all associated costs
- Reduced amount of time off the job sitting in classroom-based training
- Significant reduction in employee turnover
- Improved employee job satisfaction
- Reduced need for constant direct employee supervision
- Rewards long-term employees
- Aids in the recruiting process

Training Progression

Our training program is very comprehensive and multi-faceted in nature. The core program element is our ***Line Clearance Qualification Standard (LCQS) Training Program***. Employee participation is required; not optional.

The *LCQS Training Program* is the backbone of the Company's training program. The program is directed exclusively at developing an employee's skills in a specific job class. Those job classes include Ground Person, Ground Trimmer, Climber, Bucket Operator, Specialized Equipment Operator, and Foreperson.The LCQS Training Program is a graduated training program based on an employee's anticipated career lifecycle in the field of vegetation management. The program incorporates Company policies and procedures, best safe work practices, as well as OSHA rules and regulations.



Each job class training program consists of several training modules (called Critical Tasks), which cover numerous safety rules and work practices that address each employee's job assignment. Each employee must demonstrate proficiency in each category of job assigned responsibilities prior to becoming qualified at different levels in the LCQS. FINAL Proficiency evaluations are administered for each of the six (6) job classifications covered by the LCQS.

Other preliminary employment training assessment processes include pre-employment job screening and the New Employee LCQS Training Program (NELO).

Additionally there are numerous other supported training activities not covered in the LCQS program, for example: on-the-job (OJT) training conducted by Forepersons and General Forepersons; mandatory participation in weekly safety tail gate meetings; mandatory participation in daily job briefings; safety bulletins; and training in areas such as first aid/CPR, GHS Hazard Communication Program requirements, Temporary Traffic Control, and wildfire prevention, as well as other targeted training campaigns delivered at both the regional and corporate level.


Safety Letter — Fire Extinguisher

Fire Extinguisher

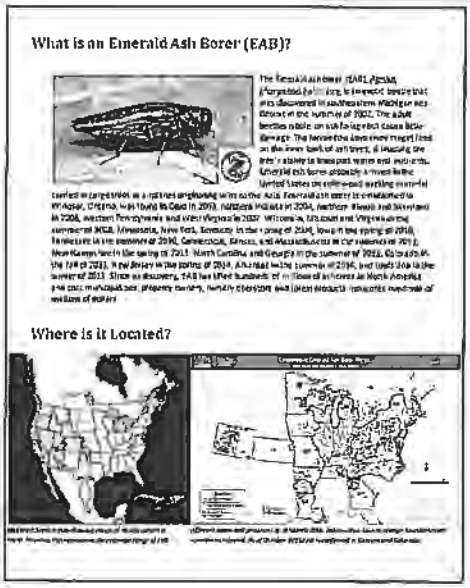
Quick Reference Guide

PASS

1. Pull the pin
2. Aim at the base of the fire
3. Squeeze the handle
4. Sweep side to side

What to Do if a Fire Starts

SHOULD THE FIRE GET OUT OF CONTROL ALL PERSONNEL SHOULD MEET BACK AT SAFE LOCATION!


What is an Emerald Ash Borer (EAB)?

Where is it Located?

Training Methods & Delivery

Training is administered by Field Management including General Foreperson and Forepersons who are qualified experienced workers. Field Management personnel implement the Company's safety and training programs while ensuring that Forepersons and Crewmembers are properly trained in Company policies and procedures, the proper use of tools and equipment and proper work techniques.

The Company publishes, distributes to, and trains each employee in safe work practices and continually updates these practices based on Company experience, industry experience, incident analysis, OSHA and NIOSH publications and proposals.

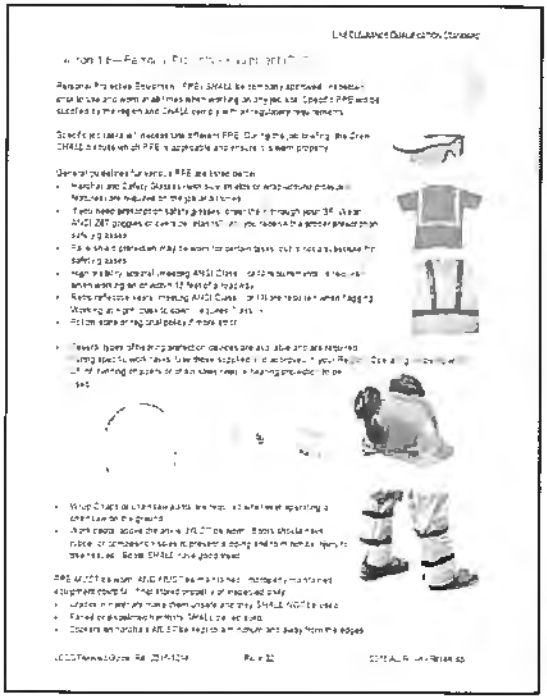
Training publications are distributed on a weekly basis. These publications are reviewed with each employee by the Foreperson as part of our OJT training process. This process is monitored by supervision to ensure - to the greatest degree possible - that training is uniform and consistent.

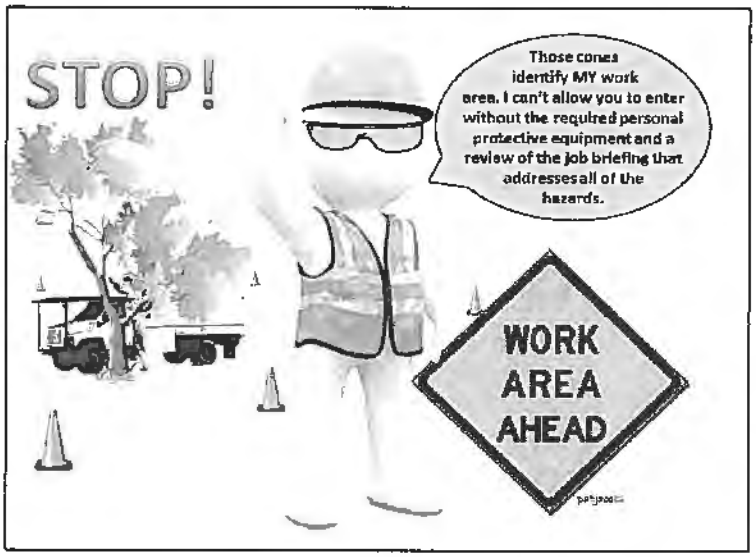
Daily Job Briefings are required for every field employee and are conducted on the crew work site.

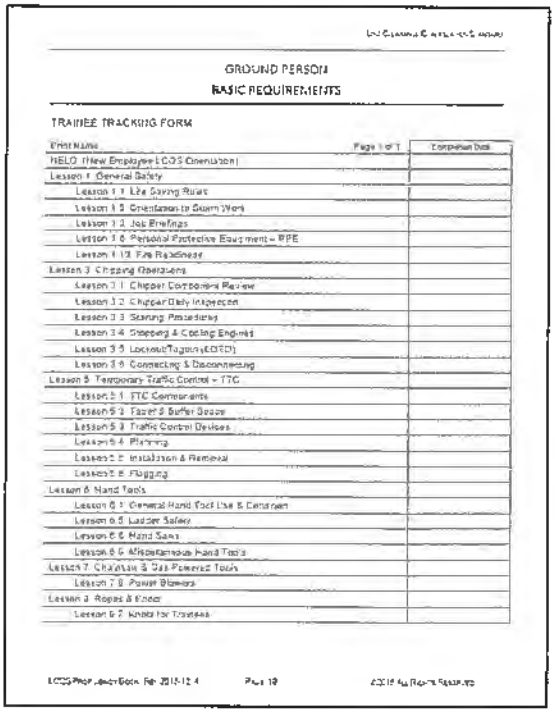
General Forepersons make frequent visits to crew work site locations for the purposes of observing and appraising work in process, evaluating on-the-job training, routine inspection of tools and equipment and to ensure that all employees are working in compliance with Company policies and safe work practices.

The LCQS in More Detail . . .

The Line Clearance Qualification Standard has been prepared to encompass six different classifications: Ground Person, Ground Trimmer, Climber, Bucket Operator, Specialized Equipment Operator, and Foreperson. Each booklet contains the critical tasks and proficiencies that serve as a guide for both the trainer and trainee.



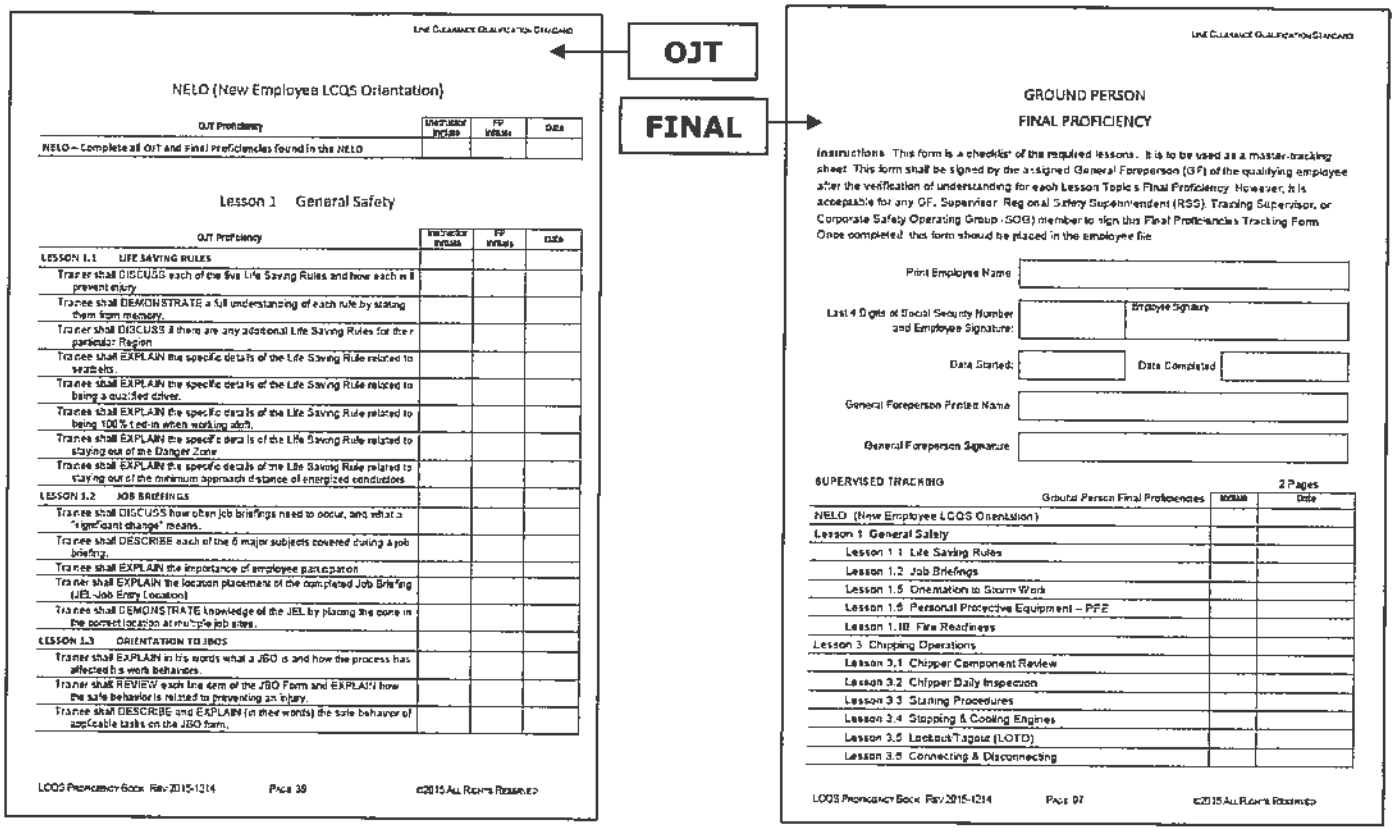




Illustrations and graphics have been used throughout the LCQS book for a consistent approach to enhance the dissemination of information accurately, and with ease of comprehension. Visuals are also used to accommodate all learning styles. The graphics and illustrations interact with the text, making it clean and simple to understand. The use of illustrations and graphics is a 'training made visible' approach. The LCQS book makes use of graphics and illustrations to display information in a means of visual explanations.

Training Proficiencies

There are two different levels of proficiencies for each job classification contained in the LCQS book: **OJTs** and the FINAL PROFICIENCIES.



Proficiency Activities

Note: Proficiency is defined as a thorough competence derived from training and practice. Depending on the activity, the trainee shall be able to describe or demonstrate they know and understand the task.

- On-the-Job (OJT) Proficiency Activities are designed to provide a step-by-step approach to what the Foreperson is required to teach and what the trainee is required to know.
- A critical task is defined as a work activity that requires a specific skill or knowledge for an employee to be proficient for a particular job class. The critical tasks are the job activities that have shown, if not performed correctly, are the main reason for injuries in our industry.
- As the lessons of each critical task are being covered with the trainee and he or she demonstrates they are proficient in the material covered, the Instructor/Foreperson must initial and date each specific OJT Proficiency Activity for the lesson.

- Critical Task OJT Proficiencies shall remain in the Training Booklet and are not required to be signed off by the GF, but shall be reviewed as part of the FINAL Proficiency/ Qualification.

- Forepersons are responsible for the training of all new employees. It is understood that other qualified employees of a crew may instruct someone of lesser qualifications.

- Once a training lesson is completed and the employee has demonstrated they are proficient in the job requirements, the GF may review and sign off on a corresponding "spot-check" proficiency on the Final Proficiency.

- Employees with previous experience as line clearance workers shall follow the guidelines described in the Appendix.

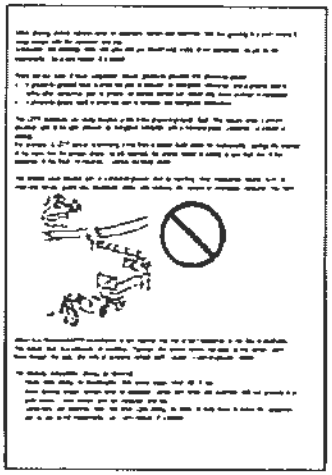
Skills Training for OJTs (4-Step Method)

The Foreperson utilizes the 4-Step Training Method in all Critical Tasks.

Step 1 – Tell + Why

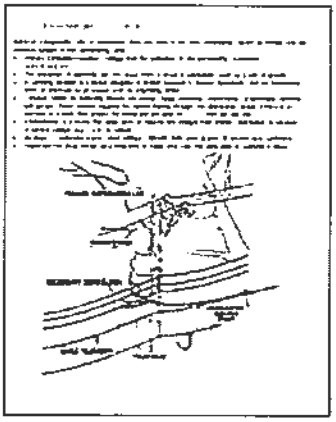
Get specific. What is the Critical Task to be learned, why it is important and what are the hazards? Tell your trainees what you are going to teach, where it fits into the total job and the steps and key points involved to do each task correctly and safely.

- Review the task description and diagrams in the lessons of the Critical Task.
- If Safety Bulletins exist for the subject being instructed, have the trainees review them.



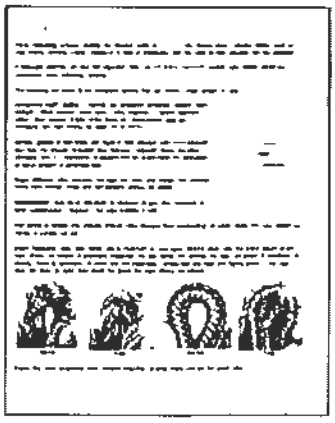
Step 2 – Show

- This is where you show the trainee how to do the particular critical task. Position the trainee where they can observe from the same angle as you.
- Go slowly, and give the person plenty of time to ask questions.
- Explain why things are done in a certain manner, and stress the key points and the safe work practices. Make sure you repeat your demonstrations until you feel confident that each step is clearly understood by the trainee.



Step 3 – Try Out

- This is hands-on practice.
- The trainee must "instruct" you (the trainer) on how to do the job. The trainee should instruct you on what to do and they should talk you through the actual job performance. If the trainee's instructions are complete and correct, then they should be allowed to perform the work while you continue to observe and question them.
- Mistakes must be corrected immediately. Do not give poor techniques a chance to become a habit. Be patient and encouraging.



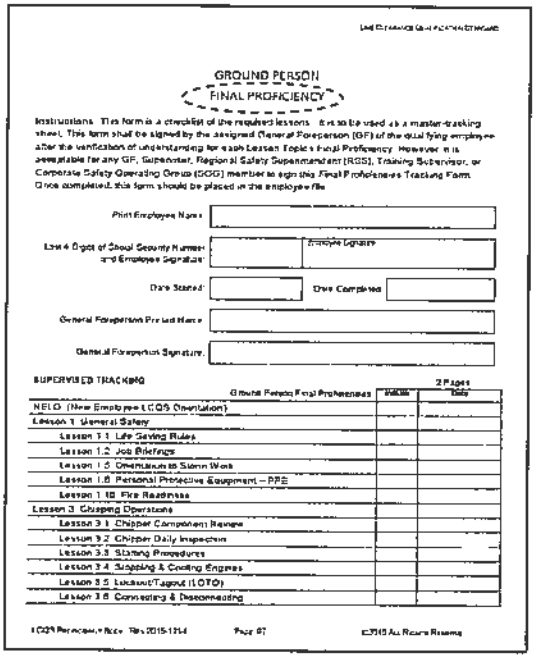
Step 4 – Check and Follow Up

- Once the trainee has demonstrated their job knowledge and skills are sufficient, allow the trainee to work on their own. Check the actual methods frequently enough to ensure continued safe, high quality and high production work.

FINAL Proficiencies

- FINAL Proficiency Forms are located at the back of the Proficiency Book. They have been designed to serve as the final verification that an employee is fully qualified to perform a particular critical task.

- FINAL Proficiency Forms shall be reviewed and initialed. The forms should be reviewed by the assigned GF of the qualifying employee; however, it is acceptable for any GF, Supervisor, Regional Safety Superintendent (RSS), Training Supervisor, or Corporate Safety Operating Group employee to sign off Final Proficiency Forms.



GROUND PERSON
FINAL PROFICIENCY

Instructions: This form is a checklist of the required lessons. It is to be used as a master-tracking sheet. This form shall be signed by the assigned (General Foreperson (GF) of the qualifying employee after the verification of understanding for each Lesson Topic's Final Proficiency. However, it is acceptable for any GF, Supervisor, Regional Safety Superintendent (RSS), Training Supervisor, or Corporate Safety Operating Group (CSG) member to sign this Final Proficiencies Tracking Form. Once completed, this form should be placed in the employee file.

Print Employee Name:
Last 4 Digits of Social Security Number and Employee Signature:
Employee Signature
Date Started:
Date Completed:
General Foreperson Printed Name:
General Foreperson Signature:

SUPERVISED TRACKING — 2 Pages

Ground Person Final Proficiencies	Initials	Date
NELO (New Employee LCQS Orientation)		
Lesson 1 General Safety		
Lesson 1.1 Life Saving Rules		
Lesson 1.2 Job Briefings		
Lesson 1.5 Orientation to Storm Work		
Lesson 1.6 Personal Protective Equipment – PPE		
Lesson 1.10 Fire Readiness		
Lesson 3 Chipping Operations		
Lesson 3.1 Chipper Component Ranges		
Lesson 3.2 Chipper Daily Inspection		
Lesson 3.3 Starting Procedures		
Lesson 3.4 Stopping & Cooling Engines		
Lesson 3.5 Lockout/Tagout (LOTO)		
Lesson 3.6 Connecting & Disconnecting		

LCQS Performance Plans Rev. 2015-1214 Page 87 ©2015 All Rights Reserved

- The management employee administering the Final Proficiency shall:
  1. Personally, review and confirm that each OJT Proficiency Activity has been completed for the Critical Task being qualified.
  2. Perform the "spot check" proficiencies included on the FINAL Proficiency Form that pertain to the employee's level of completed training *(i.e. Ground Person, Climber, Bucket Operator etc.)*

- The GF does not need to confirm "spot check" proficiencies all at once (*in one setting*). The individual "spot check" proficiencies may be signed off one at a time as the OJT Proficiency Activity has been confirmed completed for the Critical Task being qualified.

- Completed and signed FINAL Proficiency Forms shall be removed from the LCQS Booklet and placed in the employee's regional personnel file. File tracking, consistency, timeliness and completion are tracked through the file monitoring program *Safety Suite*.

LCQS Average Progression Timeline

Level	Time
NELO	First 15 Working Days
Ground Person	2 Months
Ground Trimmer	4 Months
Climber	6 Months
Bucket Operator	6 Months
Specialized Equipment Operator	4 Months
Foreperson	6 Months

The above timeline serves only as a reference for reasonable expectations and should NOT be used as a "written-in-stone" requirement. The average timeline is based on a new employee without prior experience or advanced education.

LCQS Lessons Table of Contents

OSHA's Form 300

Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 2021

U.S. Department of Labor

Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12. Feel free to use two lines for a single case if you need to. You must complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.

Establishment name Asplundh Tree Expert, LLC - 059

City Nicholasville State KY

Identify the person			Describe the case			Classify the case (CHECK ONLY ONE box for each case based on the most serious outcome for that case)				Enter the number of days the injured or ill worker was:		Check the "Injury" column or choose one type of illness:					
								Remained at work				(M)					
(A) Case No	(B) Employee's name	(C) Job Title (e.g., Welder)	(D) Date of injury or onset of illness	(E) Where the event occurred (e.g., Loading dock north end)	(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., Second degree burns on right forearm from acetylene torch)	Death (G)	Days away from work (H)	Job transfer or restriction (I)	Other record-able cases (J)	Away from work (K)	On job transfer or restriction (L)	Injury (1)	Skin disorder (2)	Respiratory condition (3)	Poisoning (4)	Hearing loss (5)	All other illnesses (6)
2021-059-006	JESSIE A MOHNEN	Trimmer / Climber - NON-UNION	04/08	Manually climbing a Silver Maple Tree.	Crushing / Pelvis / Right Side / Caught in or compressed by equipment or objects / Branch	☐	☑	☐	☐	175 days	0 days	☑	☐	☐	☐	☐	☐
2021-059-009	JAMES E WALKER	Foreperson - NON-UNION	05/17	K.U Distribution R.O.W.	Strain / Shoulder(S) / Right Side / Overexertion in holding, carrying, turning or wielding objects / Improper Ergonomics	☐	☐	☐	☑	0 days	0 days	☑	☐	☐	☐	☐	☐
2021-059-012	SHANE M SANDFER	Groundperson - NON-UNION	07/08	Manually climbing a tree	Puncture / Foot / Right Side / Struck against moving object / Climbing Gaffs	☐	☑	☐	☐	106 days	0 days	☑	☐	☐	☐	☐	☐
2021-059-018	JOHN D WOLCH	Groundperson - NON-UNION	09/13	Passenger in a Lift Truck	Abrasion / Forearm / Right Side / Struck against Stationary Object / Unknown	☐	☑	☐	☐	2 days	0 days	☑	☐	☐	☐	☐	☐

Page Totals -> 0 3 0 1 293 0 4 0 0 0 0 0

(1) Injury (2) Skin disorder (3) Respiratory condition (4) Poisoning (5) Hearing loss (6) All other illnesses

ASPLUNDH
TREE EXPERT CO.

About Asplundh Training Programs

Asplundh training begins with pre-hire screening, then continues with thorough orientation, on-the-job training conducted by qualified supervision, and detailed documentation of employee capabilities. Upon completion of the program, employees are certified to have achieved the knowledge and skills required for the performance of their work assignments per company policy and OSHA requirements.

Employees involved with line clearance and vegetation management participate in the Asplundh Line Clearance Qualification Standards Program (LCQS). This program consists of several training modules that cover safety rules, work practices, utility arboriculture, and other knowledge necessary to address each employee's job assignment. Each employee must demonstrate proficiency in each job category prior to becoming certified at different levels in the LCQS Program.

Employee Skills Training Program

The LCQS Program is directed specifically at developing skills in compliance with the requirements of OSHA regulations, company policies and work practices. The key requirement to becoming certified is the ability to demonstrate proficiency in the skills needed to perform the job tasks before final testing is administered for each of the job classifications covered by the certification program.

Training publications are distributed on a weekly, bi-monthly and monthly basis. These publications are reviewed with each employee by the crew foreperson as part of our on-the-job training process. This process is monitored by supervision to ensure that training is uniform and consistent.

The general foreperson makes frequent visits to crew worksite locations for the purposes of observing and appraising work in process, evaluating on-the-job training, routine inspection of tools and equipment, and ensuring that all employees are working in compliance with company policies and safe work practices. Daily tailgate meetings are required for every field employee and are conducted on the crew worksite.

Asplundh publishes, distributes to, and trains each employee in safe work practices and continually updates these practices based on company experience, industry experience, accident analysis, OSHA and NIOSH publications and proposals.

Our safety/training programs are multi faceted and very comprehensive in nature. They include, employee pre-hire screening, thorough orientation programs for new employees, closely monitored on the job training conducted by highly qualified General Foreperson and Crew Foreperson and detailed training documentation which culminates in the certification of each employee. This certification indicates that they have achieved the knowledge and skills required for the performance of their work assignments.

Our Corporate Safety Department provides Safety Professional Consulting Expertise, Trend Analysis & Reporting, Coaching & Training Support, Program Communication Support, Compliance Monitoring Support, and Incident Investigation/Experience Assessment Support. Regional Safety Committees, Regional Leadership Teams, and our Corporate Leadership Teams review employee suggestions and feedback, industry and regional best practices, JHA and Behavioral Observation information, incident information, audit information, and develop safety action plans for closed loop management process improvement.

ASPLUNDH
TREE EXPERT CO.

Field Operations Training

Asplundh field operations training programs meet or exceed the requirements of the Occupational Safety and Health Act Regulations (OSHA), and ANSI Z133, American National Standard for Arboricultural Operations - Safety Requirements Standards, and American National Standards Institute (ANSI) A300 Standards for Tree Care Operations pertinent to Utility Line Clearance.

Field management personnel (Region Managers, Supervisors, Safety Superintendents, and General Forepersons), in addition to managing program implementation, conduct frequent work site inspections to ensure that employees are thoroughly trained and working in compliance with our policies. Documentation of this activity is maintained for verification purposes. Company policy and Federal (OSHA) regulations require training certification.

Asplundh safety training is coordinated and administered by our VM Corporate Safety Officer, who directs a team of safety consultants that supports line management and regional supervision in audits of field operations for compliance and assists with program implementation. Audit results are documented and distributed to operational management for continual improvement.

Industry Safety Standards or Special Safety Requirements

Asplundh participates in the ANSI Z133 industry safety standards development process, and is committed to meeting or exceeding those Standards in every area where they apply. The Z133 Standard encompasses all aspects of arboricultural safety (including utility arboriculture), such as fundamental requirements regarding personal protective equipment, job briefings, tie-in policies, minimum separation and other critical areas.

ASPLUNDH
TREE EXPERT CO.

OSHA 1910.269 covers the operation and maintenance of electric power generation, control, transformation, transmission, and distribution lines and equipment. Asplundh training programs are designed to meet or exceed the requirements of these regulations.

Asplundh recognizes that our employees have made us the number one Company of our kind in the world. The Company places its number one value on the safety of our people. Therefore, it is strict Asplundh policy to provide each employee with a safe and healthy place to work, free from all recognized hazards. Asplundh requires compliance with the Occupational Safety and Health Act Regulations, the American National Standard Institute Standards, and Line Clearance Qualification Standards and training publications distributed by the Company.

Line Clearance Qualification Standard

The LCQS Training Program is the backbone of our training program. The program is directed exclusively at developing an employee's skills in a specific job class. Those job classes include: Groundperson/ Trainee, Climber Trimmer, Bucket Operator, Specialized Equipment Operator, and Foreperson. The LCQS Training Program is a graduated training program based on an employee's anticipated career lifecycle in the field of vegetation management. Every work practice has been reviewed and analyzed and incorporates "safety first" practices interwoven with the correct work practices for a specific task.

Each job class training program consists of several training modules (called Critical Tasks), which cover numerous safety rules and work practices that address each employee's job assignment. Each employee must demonstrate proficiency in each category of job assigned responsibilities prior to becoming qualified at different levels in the LCQS. FINAL Proficiencies evaluations are administered for each of the five (5) job classification covered by the LCQS.

Additionally there are numerous other supported training activities not covered in the LCQS program, for example: on-the-job (OJT) training conducted by Forepersons and GFs; mandatory participation in weekly safety tail gate meetings; mandatory participation in daily job briefings; safety bulletins; and training in areas such as first aid/CPR, Hazard Communication Program requirements, Temporary Traffic Control, as well as other targeted training campaigns delivered at both the regional and corporate level.

Asplundh's training approach has measurable goals and proven results:

- Substantially improving an employee's knowledge and skill
- Dramatically increasing employee productivity
- Significantly reducing the number of on-the-job injuries
- Tangible saving, both in on-the-job injury loss of productivity, as well as all associated costs
- Reduced amount of time off the job sitting in classroom-based training
- Significant reduction in employee turnover
- Improved employee job satisfaction
- Reduced need for constant direct employee supervision
- Rewards long-term employees
- Aids in the recruiting process

General Foreperson's Professional Development Program

New Asplundh vegetation management services GFs undergo a program where they are mentored by the Asplundh Regional Management team, and then participate in the GF Development Program held at the Home Office in Willow Grove. The Program is designed to help promising forepersons bridge the transition to the GF level.

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The intensive 40 hour in-residence course prepares forepersons for the additional responsibilities they will encounter with advancement into the higher levels of field management.

The course includes training on the following topics:

- *Safety Management*
- *Human Resources*
    - Employee Relations
    - Labor Relations
    - Managing for Performance
- *Quality Control*
- *Work Management Fundamentals*
    - Effective labor, equipment, materials, subcontractor services, resource utilization
    - Program Approach to Scope, Schedule, Cost, Quality, People, Communications, Procurement of Services and Materials, and Risk Management
    - Production Reports
- *Estimating Fundamentals and Cost Control*
- *Customer Relations*

GFs are encouraged to pursue ISA Arborist Certification and Utility Specialist credentials.

Ultimately, qualified GFs with Regional Manager potential are nominated and selected for the Asplundh Management Leadership Academy.

Asplundh Management Leadership Academy

The Leadership Academy was created as a formal education program to accelerate the technical, managerial, and leadership development of our prospective Regional Managers; high-potential candidates for leadership advancement. We recognized the need to capture the institutional knowledge of our best performers and pass it on to the next generation of Asplundh leaders to sustain consistent performance and invest in our long-term continual learning and growth. The primary training themes of the intensive, week long, in-residence program are growing the business, managing customers and projects, and developing leadership skills.

The curriculum is taught by third-party consultants with relevant specialized expertise and Asplundh's own exemplars and subject matter experts using a variety of interactive education and training methods.

Asplundh Leadership Academy Topics include:

- *The Asplundh Way*
    - Sponsor Expectations
    - Mission, Vision, Values, Goals
    - Customer: Relationship, Relationship, Relationship
    - Leadership
    - Safety, Efficiency, Innovation
- *Safety Management Process Overview and Leading Safety Culture Change*
- *The Cost of Quality - Insurance/Risk Management*

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- *Operations- Leading a Region Operation*
- *Personnel Management*
    - Recruiting, Hiring, Motivating, Retaining
    - Affirmative Action/I-9 Compliance
    - Understanding Wage & Hour Rules
- *Program and Project Management*
- *Contract Compliance/Effective Contracts*
- *Financial Management*
    - Estimating, Proposals, and Cost Management
- *Fleet Management for Competitive Advantage*
    - AVMS Automated Vehicle Locating (AVL) for Safe Production
- *Information Technology*
    - Mobile Workforce Field Applications

Asplundh Tree Expert, LLC.

Job Briefing Policy

I. Introduction:

The Job Briefing is a risk assessment process to survey the work environment prior to starting work tasks.

II. Purpose:

The purpose of the Job Briefing is to document, and communicate the following elements to all employees and visitors entering the work area – work procedures, energy sources and controls, hazards identification, special precautions and PPE to wear.

III. Definitions:

Employee – Individuals employed by the Company or any of its subsidiaries.

IV. Responsibility & Authority:

Safety Operations Group – The group is responsible for:

- Providing a Corporate Job Briefing template for use in the field.

Executive Management – Responsible for:

- Supporting the safety process, including training and work analysis, and ensuring that the necessary resources are made available.
- Directing the implementation of company safety policies and procedures.

Regional Management – Responsible for:

- Participating in periodic reviews of the Job Briefing system.
- Ensuring that the Job Briefing system is in place, communicated, and followed in their region area(s).
- Ensuring that employees are effectively trained on the Job Briefings and their completion.
- Ensuring the regular review of Job Briefings.

Employees – Responsible for:

- Participating in Job Briefings, and seeking clarification if training is not fully understood.
- Complying with all Job Briefing procedures.
- Proposing suggestions to Regional Management for continual improvement opportunities.

Contractors and Visitors – Responsible for:

- Participating in Job Briefings required for work in the area, and seeking clarification if training is not fully understood.
- Complying with all corporate Contractor Safety and regional EHS policies and the Job Briefing process.

V. Procedure:

Employees, contractors and visitors shall support the Job Briefing Process as described below. An employee working alone and performing a work task shall complete a documented Job Briefing to ensure that all aspects of safety have been identified and addressed.

Prior to the Start of Work: Perform a ***detailed hazard assessment***. The Crew Foreperson, or employee in charge, along with crew members, SHALL survey the work location in order to identify all hazards that could injure an employee or cause property damage.

The Crew Foreperson shall assure that a job briefing is conducted with all employees involved before they start each job. The briefing shall cover at least the following Steps (refer to: "Job Briefing – Know the 5 Steps").

Step 1. ***Work Procedures*** – Crew members describe in detail the following: equipment and tools to be used, work sequence and specific procedures, who will do what, who is in charge, and verify that everyone understands what role they are going to play.

Step 2. ***Energy Source & Controls*** - Know the voltages (Minimum Approach Distance, outage procedures, storm work procedures, etc.); Stored energy (gravity on falling objects; branches under pressure/tension); High pressure (hydraulics); Mechanical energy (moving and rotating parts); Exposure to chemicals (through skin, inhalation or ingested) or Noise energy (hearing).

Step 3. ***Hazards*** – associated with the job are documented (e.g. tree conditions, over hangs, ground conditions, stored energy, dogs in a yard, wind, vines, etc.). All hazards will be mitigated prior to start of work.

Step 4. ***Special Precautions*** – to be followed for emergency medical service; storm work procedures; vines, roping; and/or use of local authorities for customer issues, etc.

Step 5. ***Personal Protective Equipment*** required - (e.g. safety glasses, hard hats, etc.).

Documenting the Job Briefing

This shall be performed on a Job Briefing Form, with a pen and on a form that contains at least those items contained on the Corporate-Level Job Briefing Form.

The Crew Foreperson shall sign the form, and each employee on the crew shall initial. Completed forms shall be maintained in the possession of the crew or in another designated location for a minimum of (30) days.

Communication of Job Briefings:

The Person-in-Charge of the job site *SHALL* review the Job Briefing's minimum 5 Steps with all personnel, and with any new personnel and visitors that enter the job site.

- **Crew and Visitors *SHALL* sign the Job Briefing**.

Frequency of Job Briefings

The number of Job Briefings shall follow these guidelines -

A. Normal Work: There *SHALL* be at least (1) one **written Job Briefing each day** before work begins on all types of crews.

B. Work with a Significant Task Change:

An additional job briefing *SHALL* be documented and conducted if significant changes, which might affect the safety of the employees or property, occur during the course of the work.

- *A "Significant Work Change" means the identification of* ***a new hazard; or the addition of a new task that was not covered*** *in the scope of the original Job Briefing.*
- *A new Job Briefing SHALL be completed when the Temporary Traffic Control is changed.*

C. Storm / Emergency Work: A new written Job Briefing *SHALL* be conducted for **each new job site or storm job** before the work tasks begin.

Working Alone: An employee working alone and performing a work task shall complete a documented job briefing to ensure that all aspects of safety have been identified and addressed.

Job Entry Location (JEL): Control those who enter your work site Create a JEL (Job Entry Location). Using a green cone is preferred as the standard way to mark the location of the job briefing and the best/recognized entry point into the job site.

Four Key Aspects:

1 What are the critical steps?
2 What are the error-likely situations?
3. What's the worst thing that could happen?
4 What defenses are in place?

VI. Quality Control: N/A

VII. References:

Form FD-530 Job Briefing Form (Current Version)

VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Reviewed By
1	V	Step 2 (Energy Sources) added	4/15/16	SOG
2	V	Frequency of JB regarding Traffic Control	4/15/16	SOG
3	All	Reformat to Job Briefing (Rev. 2015 12-09)	4/28/17	N. Volwieder
4	All	Job Briefing requirements & frequency	11/02/18	N. Volwieder, CSP

IX. Attachments: N/A

X. Approval Signatures:

Approver's Name	Position / Title	Signature
Bruce Mellott	VP, Corporate Safety	

Asplundh Tree Expert, LLC.

Safety Communication & Meetings Policy

I. Introduction:

The personal safety and health of each Employee is of primary importance. The prevention of occupationally induced injuries and illnesses is our principal purpose. The goal is to achieve this through safety communications, safety meetings, awareness, sharing Lessons Learned, motivating positive behaviors and advising employees of changes in corporate and regional safety policies & procedures. The goal is fewer incidents, lower costs and to ultimately improve the employee morale and safer production.

II. Purpose:

The purpose of this policy is to implement regional safety meetings & communications, in alignment with Corporate Safety Initiatives / Programs.

This policy implements a proactive health and safety communication channel, which involves all levels of the regional management, to reinforce desired safe behaviors, and to establish long-term safe work practices.

III. Definitions:

Safety Message *- quick, simple message about safety on-the-job or off-the-job. It can be a 'popular' safety topic or a personal experience.*

IV. Responsibility & Authority:

Safety Operations Group – The SOG group is responsible for:

- Communicating corporate and regulatory requirements to Executive Management and to Regional Management.
- Initial development, administration of this document and support for the periodic review of safety goals.
- Providing training information on the Safety Management Process.
- Ensuring that required meetings are held by the region and evaluate the communication process.

Executive Management – Responsible for:

- Supporting the safety programs and ensuring that the necessary resources are made available.

Regional Management – Responsible for ensuring that safety communications and scheduled meetings are conducted and that the necessary resources are made available:

- Implement Region Safety Meetings and define the parameters.
- Specify how to communicate the region safety programs.
- Develop and maintain safety communications at all regional management levels.
- Direct and monitor the communication processes.
- Maintain appropriate records of activities.

Employees – Responsible for:

- Proactive contribution and participation in safety communications and activities.
- Being knowledgeable of the safety process for their work activities.

V. Procedure:

Increased safety awareness can reduce occupational injuries. Effective communication will help employees keep a safety focus. By motivating employees to support the company's goals, the communication and meeting plan helps shape the safety culture in the region.

Communicating the "what and how" shows concern for the safety and well-being of the employees, the ultimate success of the Communication Plan depends on visible Leadership.

The Regional Communication Plan includes the following components at a minimum –

- Safety Alerts and Lessons Learned distributed at each regional level.
- Conduct conference calls between various regional levels.

- Regional Safety meetings with GFs, Forepersons and all Crews.

Safety Message

It is in the Company's "Safety Culture" to begin each regional meeting, business meetings, and conference calls with a Safety Message This is to maintain a high level of safety awareness

Safety Meetings Frequency

a **Regional Safety Conference Calls** - at minimum **one (1) regional safety conference call** will be conducted (involving supervision as designated by regional manager) **each month** There will be an Agenda, Notes and Action items for follow up as needed.

b **Supervision & General Forepersons** - There will be **at least (1)** In-Person Safety Meeting per calendar year.

c. **General Forepersons** – There will be **at least one (1)** Safety Meeting per month **with Field Employees** held and documented by the GF.

d. **Forepersons** - There will **at least (2)** documented Crew Forepersons Safety Meetings per calendar year, not scheduled closer than three (3) months apart

e. **Employee Safety Committee (ESC)** - Schedule employee safety committee with agendas, **at least quarterly** Define the role field personnel will play assign accountability to the members of the committee and present committee recommendations to the region manager.

f. **Crews / Weekly Safety Meeting (WSM)** – a Safety Meeting (*not the Job Briefing*) shall be conducted **at least once (1) per week** The duration of this meeting shall be approximately ten (10) minutes or whatever time length is required to adequately discuss the topic.

The Foreperson or Trainer shall use the weekly safety topic (from the WSM Book) with the Crews as the basis for conducting a safety meeting The Foreperson must have the ability to deliver the information accurately and in an interesting manner to help employees understand and retain the information

For most crew employees, the safety meeting is a key part of safety education - and most importantly one of the best practices to motivate workers to buy into safety at the crew levels With informative, relevant interesting and sometimes fun safety meetings, everybody will be better able to relate and remember the information discussed This will increase safety awareness and eventually will reduce incidents.

VI. Quality Control:

- Safety Communications shall be reviewed at employee safety committee (ESC) meetings
- Regional Safety Communication Program shall be included in audit processes

VII. References:

- SAF-0030 Safety Management Process
- SAF-WSMB Weekly Safety Meeting Book
- Corporate Safety Audit Process

VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Approved By
0	All	New Document	12/05/17	N. Volwieder, ASP

IX. Attachments: N/A

X. Approval Signatures:

Approver's Name	Position Title	Signature
Bruce Mellott	VP, Corporate Safety	

Asplundh Tree Expert, LLC.

Incident Investigation

I. Introduction:

This policy covers the investigation of incidents in the work environment that have resulted in, or could have resulted in, personnel injuries, property damage, loss of operating capability, catastrophic release of a hazardous material, or adverse community impact.

II. Purpose:

The purpose of this policy is to detail the criteria, process and methodology regarding the investigation of occupational injuries, illnesses and near misses (includes vehicle and equipment incidents without injury). Consistent reporting, investigation, and management of issues will focus efforts on key areas and behaviors.

This policy applies to all employees, contractors (supplemental support) and visitors.

This policy does not address disciplinary issues. Discipline is addressed through other company policies/processes.

III. Definitions:

***Causal Factor**: An event or circumstance that produces an incident.*

***Direct Causes**: Direct causes are physical, design, or procedural causes that are typically resolved by engineering or process modifications.*

***Event Chain**: The event chain is the process of creating a block flow diagram of the incident's sequence of events. It is generated by the facts identified during the fact finding step.*

***Formal Investigation**: A formal investigation shall be conducted for:*
(1) All OSHA recordable injuries;
(2) All OSHA recordable illnesses;
(3) All significant fires;
(4) Environmental spills, or releases that are reportable to the National Response Center (NRC) or otherwise significant;
(5) Any other incident deemed appropriate by the Safety Operation or the Risk Management Groups.

***Illness**: A physiological harm or loss of capacity produced by systematic infection; continued or repeated stress or strain; exposure to toxins, poisons, fumes, etc.; or other continued and repeated exposures to conditions of the work environment over a period of time. For practical purposes, an occupational illness/disease is any reported condition which does not meet the definition of injury (traumatic).*

***Incident**: Any occurrence which results in a personal Injury, or a Near Miss which could have resulted in a personal injury; a Vehicle Incident; a Spill or Environmental Release; an event ceusing Property Damage or a business operating loss.*

***Injury**: A wound or other condition of the body caused by external force including stress or strain. The injury is identifiable as to time and place of occurrence and member or function of the body affected, and is caused by a specific event or incident or series of events or incidents within a single day or work shift.*

***Investigation**: A systematic search to determine how and why an undesired even occurred. The steps in an investigation effectively develop a sequence, analyze facts, find causes or causal factors, find barriers and recommend corrective actions.*

***Investigation Leader**: Typically the General Foreperson for the area or jobsite where the incident has occurred, however, the investigation leader can request assistance from the Safety Operations Group to help facilitate the investigation.*

*The **National Response Center** (NRC): is the federal government's national communications center, which is staffed 24 hours a day by U.S. Coast Guard officers and marine science technicians. The NRC is the sole federal point of contact for reporting all hazardous substances releases and oil spills.*

***Near Miss**: A near miss is any incident or event that could have resulted in harm to a person's safety or health, harm to the environment, or property damage, but did not.*

***Cause Analysis**: The investigation methodology used for conducting formal investigations. This process involves fact finding, the generation of event chains, solution brain storming, and recommendation rankings.*

***Safety Suite**: is the online safety management software where a region enters, manages and archives Incident Forms for: Injury & Illness Incidents; Near Miss Investigations; Vehicle, General Liability, Property Damage Incidents; or Spills & Environmental Releases.*

Safety Suite must be used any time any Event / Incident occurs – such as:

- Injury/Illness;
- Vehicle Accident of any type;
- Property Damage, whether it was owned or rented;
- General Liability, damage to another party's property or equipment caused by our actions or subcontracted personnel;
- A Near-Miss or Close Call Event;
- An Environmental Spill/Release: An accidental discharge or release of hazardous material to the environment (ground, waterway, or air).

IV. Responsibility & Authority:

Safety Operations Group – Copies of the written program may be obtained from SafetySuite. The group is responsible for:

- Communicating regulatory requirements to Executive Management and corporate requirements to Regional Management.
- Initial development, administration of this document and support for the on-going maintenance of regional safety goals.
- Facilitating incident investigations for Regional Management and conducting formal investigations as required.
- Ensuring appropriate levels of investigation are conducted.
- Monitoring regional safety trends versus goals relative to the company's operation and services.

Executive Management – Responsible for:

- Supporting the safety process, including training and work analysis, and ensuring that the necessary resources are made available.

Regional Management – Responsible for:

- Focusing on proactive activities that support the reduction of injuries.
- Preserving the incident scene.
- Initial investigation of incidents in their area of responsibility.
- Facilitating incident investigations for General Forepersons and RSSs conducting formal investigations as required.
- Ensuring appropriate levels of investigation are conducted.
- Completing Incident Forms in SafetySuite under the appropriate category (Injury & Illness; Vehicle or Property Damage etc.).
- Ensuring confidentiality of reporting and communication.
- Implementing all facets of this policy in their respective areas.
- Participating in follow-up investigations as necessary.
- Encouraging employees to report occupational injuries/illnesses and near misses.
- Notifying the appropriate Customer contact when serious injuries/illnesses occur that require transport of company or contractor employees to the hospital or if there is a potential for a lost time injury.
- Reporting the incident verbally to the Safety Operations Group within (8) eight hours of its occurrence.
- Initiate any necessary Incident Forms within (24) twenty four hours of occurrence, or by the close of business the day of occurrence, whichever is most practical, given the circumstances and location of the incident.

Employees and Contractors – are Responsible for:

- Cooperating with incident investigation, case management and corrective actions.

V. Procedure:

Training

All personnel shall be trained in their roles and responsibilities for incident response and investigation and reporting using the Incident Management Guide in SafetySuite.

Immediate Actions following an Incident or Event

- ✓ Help the injured first.
- ✓ Do not move the injured unless there is imminent risk of further injury due to surroundings.
- ✓ If the injury appears serious - **call 911!** Describe the nature and extent of injury. Be specific (example: deep cut to left thigh, etc.).
- ✓ Provide the Emergency Responders the incident location, and time of injury (Where? / When?).
- ✓ If the injury is not serious, administer First Aid treatment.
- ✓ Notify the GF, Supervisor, RSS, the assigned Corporate Safety Consultant (CSC) and Risk Management by phone call (not by voicemail).
- ✓ The area and/or equipment where the incident occurred shall be preserved as best as possible, except in an emergency, until evidence relevant to the preliminary investigation is documented.
- ✓ Secure the scene; protect any evidence and have the crew preserve the site in an "as-is condition".
- ✓ One Regional Management representative shall go to the incident site.
- ✓ One Management representative shall accompany the injured employee to the medical facility.

Regional Management shall secure the incident area and collect factual incident information. Document information in the field using the **GF Incident Investigation Report** (see Form-F001).

Provide the following along with photo documentation:

- ✓ People present.
- ✓ Affected equipment / property.
- ✓ Pay attention to details and note for damaged tools, equipment, and property.
- ✓ Note the location of tools and equipment. Note anything that looks out of place.
- ✓ If equipment failure is suspected after the job site investigation is complete, immediately remove the equipment from service. Secure and "red tag" the equipment until further investigation can be conducted.
- ✓ Note any environmental factors (weather, lighting, temperature, noise, ventilation).
- ✓ Note any physical contributing factors (fatigue, age, health conditions).

Refer to the GF Incident Investigation Report to initiate an **Event Record** in SafetySuite.

Find out whether Government Agencies have been notified (Police, EMS, OSHA, State, County or Highway Officials, etc.).

- ✓ If any government agency is doing an investigation, you absolutely need to accompany

that person during their entire investigation.

- ✓ Photograph anything they photograph, take and record measurements of anything they measure.
- ✓ Record the names of all investigators and what agencies they represent.

If the Media is asking questions, instruct them that an investigation is underway, and beyond that provide no comment. If needed, direct them to contact Corporate Counsel.

- ✓ If necessary, obtain name(s) of media representative(s) and forward to Corporate Counsel.
- ✓ Do not allow any company employee to discuss the incident with media, attorneys, private investigators, or other parties not representing the interests of the company.

Fact Finding

Take note of any evidence

- ✓ Photographs and Diagrams
- ✓ Documentation of Conditions
- ✓ Job Briefings, and Job Behavior Observations (JBOs)
- ✓ Equipment Manuals, and Preventative Maintenance records
- ✓ Training Records
- ✓ Operating Logs
- ✓ Previous Incident reports
- ✓ Work Procedures, and Oral Instructions

The proper equipment for the investigation team should be available, including PPE appropriate to the incident area, pens/paper, measuring device (ruler or tape measure), and camera or smart phone for taking pictures or audio/video recordings and Caution / Danger tape.

Communication

a. The employee name(s), the medical treatment provided and disciplinary action(s) are Confidential.
b. Initiate the communication to the Regional Manager, and with Risk Management as soon as possible. Provide what happened, pertinent facts and the outcome (When? Where? How?).
c. Regional Management immediately report Catastrophic Events as detailed in the **Incident Management Guide** (see reference - **IMG**). All other Events are reported using the **Reporting Flow Charts in the IMG** based on the Event severity.
d. Notify Region's assigned Corporate Safety Consultant within eight **(8) hours** of Event occurrence.

e. Regional Management shall initiate an Event Record in **SafetySuite** using the appropriate Event Module, within **(24) hours** of occurrence. As a guideline, the Event Record is to be finalized no later than **(10) calendar days** after the date of the event.
f. If the Event is determined to be a SIF, report this in SafetySuite by the **close of business on day of incident**, whichever is most practical given the circumstances.

Investigation Process for All Events

Incident Investigations are required for any of the Event types listed below.

- Injury / Near Miss
- Vehicle Incident
- Property Damage
- General Liability
- Outages
- Fires or Spills

There may be an occasion when an event happens with a Company Vehicle and that event will be classified as a **Property Damage or a General Liability Event**.

For example: when vehicle-mounted equipment (i.e. bucket in a bucket truck) causes property damage to company property or causes a general liability claim, then use the appropriate SafetySuite Event Module (Property Damage or General Liability) to report the event.

Note: The event may also be associated with a **Vehicle Incident Event**.

Note: A **Potentially** Serious Injury, a Lost Time Injury, or a Serious Injury / Fatality (**SIF**) resulting from a Vehicle Incident will require a formal investigation.

The General Foreperson's Incident Investigation Report (found in SafetySuite and in the Incident Management Guide) should be used in the field to document incidents involving: an Illness & Injury; a Near Miss; Property Damage; an Agency Visit; an Environmental Spill; an Outage and General Liability.

The GF Incident Investigation Report should be signed and uploaded as a supporting document to the SafetySuite Event Record within the prescribed timeframe for event record finalization.

Additional members may be added to the investigation team for the purpose of providing specific guidance such as human performance review, apparent cause determination, or providing subject matter expertise.

✓ Where possible, the investigation process should limit identical interviews.
✓ Investigations conducted by a single individual shall have a peer review.

Factual Interviewing

If at all possible conduct interviews within (**24**) **hours** of the event.

Steps to Conducting an Interview

- ✓ **Prepare** - formulate questions for the areas that are unclear or do not seem logical.
- ✓ **Opening Conference** - try to put the person at ease if possible. Remember, people may get very defensive when being questioned.
- ✓ **Conduct** the interview.
- ✓ **Closing Conference** - let the person read what you wrote so there is no miscommunication.
- ✓ **Thank** the person.

1. Interview the Employee – The employee interview shall be conducted as soon as practical following the event. However, the interview should never interfere with the injured person receiving medical attention (sedation, etc.). The interview should focus on the following questions:
    a. What was the employee doing prior to the event?
    b. What tasks was the employee performing?
    c. What did the employee see and hear?
    d. Discuss the pre-job briefing with the employee and ask whether it was adequate.

2. Interview Witnesses – The witness interview may be able to clarify some circumstances or help verify such facts as the methods of doing the job, tools being used, or the work practices. It is advisable to interview the witnesses separately to prevent any confusion of the facts.

3. Interview other Employees who perform the same job – This interview allows consideration of another perspective from an employee who performs the same type of tasks. This interview may not always be needed but helps to determine if there are generic issues or specific worker practice issues.

Formal Investigations

The Formal Incident Investigation & Root Cause Analysis Report shall be used for:

- All Potentially Serious Injury or Fatality (SIF-P) Events,
- All Serious Injury or Fatality (SIF) Events, and
- All Lost Time Events, and
- Reportable Environmental Release Events.

This may apply to any other event as designated by the Regional Manager or by Corporate Safety.

On **Serious or Catastrophic claims** – the investigation will be conducted in conjunction with defense counsel or the insurance carrier, unless otherwise directed by Corporate Safety and

Risk Management in which case reports must be prepared in accordance with counsel.

The Formal Incident Investigation & Root Cause Analysis shall be **initiated** as promptly as possible but no later than **(24) hours**; and **finalized** as soon as possible, but no later than **(21) calendar days** after the date of the event.

Regional Management will lead the formal investigation team.

The Formal Incident Investigation & Root Cause Analysis Report must contain the following sections:

1. Title Page
2. Outline
3. Narrative of Incident
4. Reenactment Photo(s)
5. Human Performance
6. Snap Chart
7. Causal Factor(s)
8. Root Cause(s) and SMARTER(*) Corrective Action(s)
9. Questions?
10. Root Cause Tree

(*) SMARTER = *Specific, Measurable, Accountable, Reasonable, Timely, Effective, & Reviewed*

The Formal Incident Investigation & Root Cause Analysis Report must be uploaded as a File, to the SafetySuite Event Record as supporting documentation. The Corrective Action(s) by Root Cause must be generated from the Event Record in SafetySuite.

A **Lessons Learned** document must be created for each Formal Incident Investigation, no later than **(14) calendar days** after the date of the event. This Lessons Learned may apply to any other Event, as designated by the Regional Manager or by Corporate Safety.

Tips for factual photographs and measurements

- ✓ Take photographs starting from a distance.
- ✓ Try to take in the entire scene.
- ✓ Move in close, taking photographs of important items.
- ✓ Take photos from different angles.
- ✓ After you take close-ups, be sure to stand back a little bit and take another photo of the item to clarify the close-up.
- ✓ Take two photos from each location.
- ✓ Use a sheet of paper, number each photo, document where you were when the photo was taken and a brief description of the photo.
- ✓ Make a diagram showing the location each photo was taken from.
- ✓ Make a duplicate diagram showing the incident scene.

- ✓ Take measurements and illustrate on the diagram (make sure it is legible).
- ✓ Establish a reference point (for example, a bridge abutment, utility pole, or some other permanent structure).
- ✓ Measure everything from that point.
- ✓ Use a tape measure, if available, to show relative size in your photos.
- ✓ Include everything at the scene, such as vehicle location, work signs, safety cones, road width, location of employees, etc. Details count; be specific.

OSHA Injury Reporting Rules

Injury Reporting (within 24 hours)

Under the reporting rule, employers must report all injuries involving the in-patient hospitalization for treatment, any amputation, or the loss of an eye of ONE employee.

Employers have TWENTY-FOUR **(24) hours** to report the Injury to OSHA, **once discovered**.

In-patient hospitalization is defined as an employee being admitted to the hospital for TREATMENT, not just for observation. If the employee is first admitted to the hospital for observation but later undergoes treatment, the injury is reportable within (24) hours of the employer finding out that the employee has received treatment as part of his/her in-patient hospitalization.

OSHA defines **amputation** as "the loss of a part, such as a limb or appendage that has been severed, cut-off (either completely or partially); fingertip amputations - with or without bone loss; medical amputations resulting from irreparable damage; or amputations of body parts that have since been reattached.

Amputations **do not include** avulsions, enucleations, degloving, scalpings, severed ears or broken or chipped teeth.

Regional management will contact OSHA by calling 1-800-321-6742 (1-800-321-OSHA). You'll need to report the following information:

1. The company name,
2. The location of the work related injury,
3. The time or the reportable event,
4. The number of employee(s) who suffered a reportable injury or fatality as described by the reporting rule,
5. The name(s) of the employee(s),
6. A contact person for the company, and
7. A brief description of the work-related incident.
8. Time of your call

Fatality Reporting (within 8 hours)

Employers have **EIGHT (8) hours** to report the **Fatality, once discovered.**

Fatalities must be reported to the OSHA Area Office closest to the location of the injury that resulted in the fatality. Even though the time of your call will be noted on the voice mail or email, you should also note the time of your notification.

Also, **ALL heart attacks resulting in a fatality** must be reported within the (8) hours of discovery, regardless of it being work-related or not. OSHA will sort out those incidents that are not deemed work related at a later time

Additionally, the rule includes a reminder that if a fatality occurs **after thirty** (30) days of the work related injury, the eight (8) hour reporting rule does not apply.

Note: this means that injuries that result in death **within thirty** (30) days after the initial injury, must still be reported within (8) hours of finding out the death occurred

VI. Quality Control:

N/A

VII. Reference:

Incident Management Guide

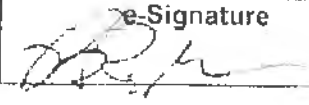
VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Reviewed By
0	All	New Document	01/31/16	SOG
1	All	Reformatted in accord with 2017 Incident Management Guide (IMG)	04/29/17	SOG
2	Procedure	Requirement & deadline on RCA Reports and Lessons Learned modified.	08/30/17	SOG
3	All	Annual review cycle	10/15/19	SOG

IX. Attachments:

EHS-0004-F001 (General Foreperson's Incident Investigation Report)

X. Approval Signatures:

Approver's Name	Position Title	e-Signature
Bruce Mellott	Vice President, Corporate Safety	

GF Incident Investigation Report

EHS-0004-F001 (also in SafetySuite)

INCIDENT DATE / TIME; AND PREPARER INFORMATION

CREATED ON: **Created By:** **Preparer's Title:** **Preparer Phone:** **Region [xxx]:**

DATE OF INCIDENT: **Incident Time:** **Date Reported to Employer:** **Time Reported:** **Work Shift:**

EMPLOYEE DETAILS

Injured Employee: [Last Name] **First Name:** **Middle initial:** **Employee's Title:** **Employee ID #:**

Immediate Supervisor: **Immediate Supervisor Phone:** **Immediate Supervisor - Length of Service in Job:**

INCIDENT GENERAL DETAILS

Incident/Event Address or (Closest Street Intersection):

Work Station: [Describe Area] **Specific Location:**

- ☐ **Injury or Illness** ☐ **Auto**
- ☐ **Hospitalization** ☐ **General Liability**
- ☐ **Near Miss** ☐ **Property Damage**
- ☐ **Fatality** ☐ **Outage**

Is this considered Storm Work OR was Weather a Contributing Factor ? ☐ **Yes** ☐ **No** IF YES – Describe the Weather Conditions:

INCIDENT DESCRIPTION

Describe the Incident:

1. What was Employee doing JUST BEFORE the incident occurred? [Name tools, equipment materials and what the employee was doing with them]
2. HOW did the incident occur? Give Full Details [Describe WHAT and HOW details, name objects, substances involved].
3. List INJURY or ILLNESS Body part. Describe the nature of the injury.

Name any other Witness (-es) present at the time of the incident:

Accident Type: **Source of Injury:** **Primary Body Part:**

TREATMENT INFORMATION

Describe Medical Treatment given beyond First Aid

☐ **Yes** ☐ **No** -Was injured treated in an **Emergency Room**?

☐ **Yes** ☐ **No** -Was injured **hospitalized overnight** as Inpatient?

☐ **Yes** ☐ **No** -Was medical treatment provided **On-Site**?

☐ **Yes** ☐ **No** - Was employee sent **Off-Site for treatment**?

Hospital/Treatment Facility: [Provide Name & Address]

☐ **Yes** ☐ **No** Was employee seen by a **Licensed Health Care Professional**?

[Provide Physician Name & Address]

CERTIFICATION

The above information is true to the best of my knowledge. I authorize an investigation of the incident events as stated and I understand that I am responsible for coordinating and providing further details related to the event.

Employee Name and Signature: **Date**

Preparer's Name and Signature **Date**

NOTE: The Event Record must be started and this GF Incident Investigation Report needs to be added into SAFETYSUITE - within 24 Hours of the Event.

ASPLUNDH
TREE EXPERT CO.

About Asplundh Environmental Management & Sustainability

Asplundh Tree Expert Co. Environmental Policy

The Asplundh Tree Expert Co., UtiliCon Solutions and their subsidiary companies and employees are pledged to conduct operations with respect to sustainable environmental principles, including:

- Meeting or exceeding the requirements of all applicable environmental laws and regulations.
- Assessing environmental risks in our operations and implementing countermeasures to mitigate environmental impacts.
- Working with our customers to achieve their environmental objectives.
- Responsibly using natural resources and continually improving the environmental performance of our facilities, fleet, and operations.

Our mission is to be the recognized world leader in providing professional, safe, cost-effective and environmentally sustainable vegetation management and other utility-related services. With this goal in mind, each person on our team is challenged to consistently exceed the expectations of the customers for whom we work and the people they serve.

For our companies, delivering environmentally sustainable services means:

- Meeting or exceeding the requirements of all applicable environmental laws and regulations.
- Assessing environmental risks in our operations and implementing countermeasures to mitigate environmental impacts.
- Working with our customers to achieve their environmental objectives.
- Responsibly using natural resources and continually improving the environmental performance of our facilities, fleet, and operations.

Our Environmental Management System assures that employees consider environmental matters in all they do. Our commitment to the protection and enhancement of the environment is embedded in our culture through our mission statement and is implemented systematically throughout our operations through communications, ongoing training, and environmental health and safety documentation. Accountability for compliance with environmental health and safety policies is the responsibility of the Corporate VM Director of Environmental Health and Safety.

Training & Procedures Support Proactive Prevention of Environmental Incidents

- HAZCOM
- Job Hazard Analysis Procedures
- Spill Prevention and Response Procedure
- Hazardous Material Handling Procedures
- Client and Project Specific Environmental Plans and Training tailored to Specific Exposures and Risks

- Species of Concern (rare, threatened, endangered, or otherwise protected species)
- Wetlands
- Stream Protection
- Archeological Sites
- Infested Wood Debris Handling

Environmental Compliance Indicators

Notices of environmental violations in the past 12 months = 0

Reportable spills in the past 12 months = 0

Responsible Environmental Stewardship and Continual Improvement

Asplundh has developed training programs for specific areas of concern regarding environmental protection, including the handling of hazardous materials, wildlife awareness training, proper tree care, promotion of environmentally sound management methods, recycling and/or proper disposal of materials and containers, etc. All employees understand the need to respect and protect the environment. After all, it is our employees who are out in the environment everyday working on trees near power lines.

We are constantly balancing nature and environmental impacts with our customers' needs for services which support affordable reliable electric service. It's what we do everyday in delivering Vegetation Management and Utility Infrastructure Services.

Responsible Resource Use

Fleet Fuel Utilization and Carbon Emissions Continual Improvement

Asplundh Tree Expert Co. and subsidiaries' carbon emissions are primarily driven by our direct Fleet Fuel Utilization. The energy we use at our headquarters office is also an indirect contributor.

We don't presently calculate our Carbon Emissions because we gain 90% of the value of GHG emissions reduction by focusing upon **Fleet Fuel Utilization Efficiency** and **Fleet Emissions Compliance** (Miles Driven, Gallons Used, Fleet meets Federal and State Requirements). We are reviewing the additional cost and benefit of calculating GHG output. We have achieved fuel reductions through Fleet design (Example: pony motors for hydraulic tools) and use of our WEX Fuel Management System and Fleet Management AVMS Automated Vehicle Locating (AVL) GPS Systems to reduce miles driven, idling, and fuel usage.

- We continue to responsibly use natural resources in Water, Energy, and Materials usage.
- We watch our waste stream for opportunities to competitively recycle or make reductions.

- We continually assess and improve the environmental performance of our facilities, fleet, and operations for business opportunities to reduce our environmental impacts and ensure our long-term financial health.

Affiliations

Asplundh technical staff and field personnel maintain involvement with groups such as The Audubon Society, the Nature Conservancy, The National Urban Forestry Council, American Forests, The International Society of Arboriculture, and others, as well as governmental agencies such as the U.S. Fish and Wildlife Service, the Environmental Protection Agency, Forest Service and various state and local agencies. Our field divisions and employees are frequently involved in environmentally-oriented projects, including habitat preservation and enhancement, protection of migratory birds, recycling and other endeavors as appropriate.

Through our active participation in industry associations like the Utility Arborists Association, International Society of Arboriculture, and Tree Care Industry Association, Asplundh is able to leverage the research and expertise of the entire vegetation management and arboriculture industries, and participate in the development of industry standards in delivering environmentally sustainable vegetation management services for the delivery of affordable reliable electric service.

Environmental Programs

- Environmentally sound ROW management
  - 57 years of support for research and best practices
  - Wildlife awareness training
  - Donating time for habitat restoration
- Promoting vegetation management best practices
  - 420+ ISA Certified Arborists on staff
  - Proper tree pruning
  - Promoting on-cycle maintenance programs
  - Integrated Vegetation Management
  - Active involvement with industry organizations
- Wood chip utilization
  - Recycling
  - Conversion to green energy
- Fleet management to reduce fuel consumption
  - AVMS GPS Automated Vehicle Location and Performance Tracking
  - Pony motors on Lifts saves 2 gallons per hour in tool mode.
  - Puradyn oil filtration system
  - Exploring alternative fuel efficient vehicles including hybrids
- Office recycling programs
  - Recovering tons of paper, bottles and cans for recycling
- Community involvement, e.g.
  - Tree plantings
  - Hanging Christmas decorations
  - Chipping Christmas trees

ASPLUNDH
TREE EXPERT CO.

- Supporter of
  - TREE Fund
  - Municipal Tree Restoration Program (MTRP), Penn State
  - Nature Conservancy
  - Ducks Unlimited

Pesticide License Holders

NAME	TYPE OF LICENSE
David Chapman	Supervisor/Operator
Gilbert King	Supervisor/Operator
Jerry Beverly	Supervisor/Operator
Jeffrey Holder	Supervisor/Operator
Raymond Kelley	Supervisor/Operator
Christopher Highfield	Supervisor/Operator
Hershel Cullen	Supervisor/Operator
Bobby Conder	Supervisor/Operator
Steve Martin	Supervisor/Operator
Randy Brown	A6
John Ruddell	A6
Charlie Adamson	A6
Danny Cooper II	A6
Robbie Ruark	A6
William King	A6
Jimmie Brown	A6
Nathan Anders	A6
Darrell Mullins	A6
Gregory Elliott	A6
David Russell	A6
Issac Jones	A6
Aaron Moore	A6
Donald Purvis	A6
Harvey Lear	A6
Stanley Barker	A6
Samuel Williamson	A6
Gary Shelton	A6
William Cullen	A6
Billy Stanley	A6
Jerry King	A6
Matthew Stanley	A6
John Boyce	A6
Jerry Jones	A6
Michael Rafferty	A6
Jeremy Williams	A6
Matt Hutcherson	A6
Earl Day	A6
Scotty Faulkner	A6
Randy Jones	A6
Owen Montgomery	A6

Matthew Metcalf	A6
Douglas Royal	A6
Rickey Pierce Sr	A6
George Manning	A6
Casey Wallace	A6
Scotty Kidd	A6
Donald Suttle	A6
David Putman	A6
Terry Roy	A6
Jason Campbell	A6
Michael Holcomb	A6
Mark Willhoite	A6
Isaac Williams	A6
Marion Sanders	A6
John Lathan	A6
John David Lee	A6
Raymond Elmore	A6
Dylan King	A6
Richard Stratton	A6
Jesse Manning	A6
Zachary Garrett	A6
Bobby Fisher	A6
Joshua Holder	A6
Bobby Clark	A6
Christopher Morris	A6
Samual Campbell	A6
Michael Delapp	A6
Blake Williams	A6
Joshua Kidd	A6
Jeremy Reynolds	A6
Walter Price	A6
Dennis Turpin	A6
Brandon Dempsey	A6
David Hall	A6
Collin Antle	A6
Caleb Caudill	A6
Danielle Gardner	A6
Dustin Gipson	A6
Kelvin Rafferty	A6
Nicholas Smith	A6
Johnny Marlowe	A6
Robert Whitaker	A6
Dwayne Whitaker	A6
Aaron Estes	A6
Sidney Click	A6
Roy Davis	A6
Christopher Downs	A6

Noah Brown	A6
Steven Denny	A6
Chris Antle	A6
David Johnson	A6
Randall Alford	A6

Asplundh Tree Expert, LLC.

Hazard Communication Program

I. Introduction:

The Company has developed this Program to ensure that all employees who could be exposed to hazardous chemicals under normal conditions, or in a foreseeable emergency are trained under the company Hazard Communication Program.

II. Purpose:

The purpose of the Hazard Communication Program is to keep employees safe at each facility and project location subject to the Hazard Communication Plan (HazCom Plan).

The Program includes:

- *Instruction on implementing a written site-specific HazCom Plan,*
- *Instruction on recognizing compliant HazCom labeling,*
- *Instruction on accessing chemical Safety Data Sheets (SDSs),*
- *Training on the elements of the HazCom Plan.*

The Company does not intend to evaluate any of the hazardous chemical substances purchased from chemical manufacturers and suppliers, but has chosen to rely upon the evaluations performed by the chemical manufacturers to satisfy the requirements for chemical hazard classification.

OSHA has adopted the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) to determine whether a chemical is a hazardous chemical.

III. Definitions:

Affected Employee *– a worker who may be exposed to hazardous chemicals under normal operating conditions, or in foreseeable emergencies.*

Globally Harmonized System *of Classification and Labeling of Chemicals (GHS) is an international system for determining if a chemical is a hazardous chemical.*

GHS-compliant labels *– contains pictograms, signal words. Manufacturer's label must be legible, in English and prominently displayed on the chemical container.*

Hazard Communication Standard (HCS) *– OSHA standard that provides chemical safety information, identities hazards of chemicals, and ensures the information is available and understandable by employees. It requires the development and sharing of information:*

- *Chemical manufacturers and importers are required to evaluate the hazards of the chemicals they produce or import, and prepare labels and Safety Data Sheets to convey the hazard information to their customers;*
- *All employers shall ensure hazardous chemicals in the workplace have labels and safety data sheets. Employers provide training on the labeling, and chemical hazards, and appropriate use and handling.*

Hazardous Chemical *- a chemical that has either: a health hazard; a physical hazard; a simple asphyxiant; a combustible dust; a pyrophoric gas or a Hazard Not Otherwise Classified (HNOC).*

Health Hazard *- is a hazard that causes any of these effects: acute toxicity; skin corrosion or irritability; serious eye damage / irritation; respiratory or skin sensitization; mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity; aspiration hazard.*

Online SDS catalog *– "Safety Suite", is the software where a region uploads, manages and archives the Chemical Inventory and SDSs for their region.*

Pictogram *– symbol within a border, background pattern that conveys specific hazard information about a chemical. Eight pictograms designate separete hazard categories.*

Physical Hazard *- is one that poses any of the following effects: explosive; flammable; oxidizer; self-reactive; pyrophoric; self-heating; organic peroxide; corrosive to metals; gas under pressure; flammable gas emitted when reacting with water.*

PPE *– Personal Protective Equipment to wear when handling, using chemicals (see Section 8 in Safety Data Sheets – Personal Protection).*

Safety Data Sheet (SDS) *– written or printed material concerning a hazardous chemical that is prepared by the chemical manufacturer or importer.*

IV. Responsibility & Authority:

Safety Operations Group – is the program coordination center. Copies of the written program may be obtained from the company portal. The group is responsible for:

- Communicating regulatory requirements to Executive Management and corporate requirements to Regional Management.
- Initial development, administration of this document and support for the on-going maintenance of regional safety goals.

Executive Management – Responsible for:

- Supporting the safety process, including training and work analysis, and ensuring that the necessary resources are made available.

Regional Management – Responsible for:

- Initial development, implementation and administration of the Regional Hazard Communication Plan.
- Signing and completing a site-specific Hazard Communication Plan using the Plan Template.
- Implementing the Plan in the Region to all affected employees.
- Maintain and manage a Chemical Inventory for the crews using Attachment - **F002.**
- Managing the region's catalog of Safety Data Sheets using SafetySuite.

General Forepersons or RSS – Responsible for:

- Signing the Plan,
- Reviewing all incoming new chemical Labels and Safety Data Sheets.
- Communicating to affected employees, new physical or health hazard information, GHS hazard(s) and signal word(s), hazard statement(s) and precautionary risk information.
- Explaining how to access hazardous chemical SDSs through the SafetySuite online Document Library, or by request from the GF.
- Using the Training Outline to train crew members.
- Using a Safety Data Sheet to discuss health and physical hazards and precautionary statement(s) and Personal Protective Equipment.
- Keeping Training Attendance Sign-Off Sheet on file with the Region.
- Ensuring new crew members are trained.

V. Procedure:

General

Each Region will develop and implement a written Hazard Communication Plan that describes how labels, other forms of warning, Safety Data Sheets and employee information will be kept.

Regional Management will provide employees and new hires effective information and training on the hazardous chemicals in their work areas for both routine and non-routine tasks.

Regional Management will communicate all information in the same manner to sub-contractors that is communicated to their own employees including how to obtain Safety Data Sheets for those chemicals housed on their vehicles or in their facilities.

Container labeling must be written in English and contain:

- The identity of the hazardous chemical
- The appropriate hazard warnings
- The name and address of the chemical manufacturer, importer, or other responsible party.

Any labeling that has been removed or defaced shall be immediately replaced.

Any shipment containing hazardous chemicals in containers without labels or labels that cannot be read will not be accepted.

Training

Regional Management will share:

- The requirements of this Program,
- Any operations in their work areas where hazardous chemicals are present,
- How to obtain a written version of their Regional Plan, and
- How to obtain the Safety Data Sheets that correspond to the chemicals to which they may be exposed.

Use Attachment - **F004** Training Outline and Attendance Sign-Off Sheet.

Plan Development

The Region implements their **Hazard Communication Plan,** using the Template attached to make the Plan (Attachment - F001) region specific:

1. *Insert the Company Name; and Region Address on the Regional Plan;*
2. *Region Manager will authorize the Plan & sign (under **Section X** – Approval Signatures).*

Regional manager provides the General Foreperson(s) the signed Plan.

The **List of Chemicals / SDS Management** (Attachment - **F002**) is completed for the crew's chemicals in use or stored in the work areas, and is uploaded to SafetySuite.

The Region manages Safety Data Sheet(s) for their Operation in SafetySuite, in the Document Library.

The GF trains the crews on Hazard Communication, using the Training Outline, covering the Safety Data Sheet sections, GHS Pictograms and Hazards using Attachment - **F003**.

All Employees sign-off using an Attendance Sheet provided, upload it online. Track this "Class" online.

VI. Quality Control:

- A completed signed **List of Chemicals / SDS Management** (Attachment - **F002**) stays with the Crew. It is also uploaded in SafetySuite – Document Library as "Chemical Inventory".
- A copy of the completed Training Sign-Off Sheet is kept electronically, by the region.
- Discontinued chemical SDSs are placed in archive status, in SafetySuite.
- Record Retention on SDS's is 30 years, by Law, after the last use of a chemical product.

VII. References:

OSHA Part 1910, Subpart Z - Toxic and Hazardous Substances

VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Reviewed By
1	New	New		SOG
2	All	Update/Reformat	01/01/16	N. Volwieder
3	All	References to SafetySuite	01/31/16	N. Volwieder
4	All	Annual Program Review	04/15/17	N. Volwieder
5	All	Legal Company Name, Reference to Attachments.	08/15/17	A. Martin
6	All	Annual Program Review	09/13/18	N. Volwieder
7	N/A	Annual Program Review	08/30/19	SOG
8	N/A	Annual Program Review	08/30/2020	SOG

IX. Attachments:

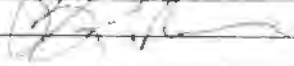
IH-0009-F001 – Hazard Communication Regional Plan Template

IH-0009-F002 – List of Chemicals / SDS Management Template

IH-0009-F003 – Safety Data Sheets GHS Pictograms

IH-0009-F004 – Training Outline and Attendance Sign-Off Sheet

X. Approval Signatures:

Approver's Name	Position / Title	Signature
Bruce Mellott	VP Corporate Safety	

IH-0009-F001
Hazard Communication Plan

Asplundh Tree Expert, LLC
200 Two Oaks Dr.
Nicholasville, KY 40356
(859)305-6576

I. **Introduction:** It is Company Policy that all crews comply with the Hazard Communication Plan.

II. **Purpose:** The OSHA Hazard Communication Federal Law requires employers to notify their employees about hazardous chemicals in the workplace, or at their job site, prior to working with / near these chemicals (29 CFR 1910.1200).

Each crew shall receive training on the Hazard Communication Plan (the "HazCom Plan") and information on hazardous chemicals on the job site. The training includes the category of chemical hazards, and how to obtain a Safety Data Sheet on a chemical. The Plan will be kept by the Region and provided upon request to all employees.

Each completed Hazard Communication Plan will contain:

- Instruction on implementing the written HazCom Plan,
- Instruction on recognizing compliant HazCom labeling,
- Instruction on accessing chemical Safety Data Sheets (SDSs),
- Training on the elements of the HazCom Plan.

III. Definitions:

Affected Employee *– a worker who may be exposed to hazardous chemicals under normal operating conditions, or in foreseeable emergencies.*

Globally Harmonized System *of Classification and Labeling of Chemicals (GHS) is an international system for determining if a chemical is a hazardous chemical.*

GHS-compliant format *– contains pictograms, signal words. Manufacturer's label must be legible, in English and prominently displayed on the chemical container.*

Hazard Communication *Standard – provides chemical safety information for the workplace, identities hazards of chemicals, and ensures the information is available and understandable by workers.*

OSHA's Hazard Communication Standard (HCS) requires the development and sharing of this information –

- *Chemical manufacturers and importers are required to evaluate the hazards of the chemicals they produce or import, and prepare labels and Safety Data Sheets to convey the hazard information to their customers;*

- *All employers shall ensure hazardous chemicals in the workplace have labels and safety data sheets. Employers provide training on the labeling, and chemical hazards, and appropriate use and handling.*

***Hazardous Chemical** - a chemical that has either: a health hazard; a physical hazard; a simple asphyxiant; a combustible dust; a pyrophoric gas or a Hazard Not Otherwise Classified (HNOC).*

***Health Hazard** - is one that causes any of these effects: acute toxicity; skin corrosion or irritability; serous eye damage / irritation; respiratory or skin sensitization; mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity; aspiration hazard.*

***Online SDS catalog** – "Safety Suite", is the software where a region uploads, manages and archives the Chemical Inventory and SDSs for their region.*

***Pictogram** – symbol within a border, background pattern that conveys specific information about the hazards of a chemical. Eight pictograms designate separate hazard categories.*

***Physical Hazard** - is one that poses any of the following effects: explosive; flammable; oxidizer; self-reactive; pyrophoric; self-heating; organic peroxide; corrosive to metals; gas under pressure; flammable gas emitted when reacting with water.*

***PPE** – Personal Protective Equipment to wear when handling, using chemicals (see Safety Data Sheet Section 8 – Personal Protection).*

***Safety Data Sheet** – written or printed material concerning a hazardous chemical that is prepared by the chemical manufacturer or importer.*

IV. Responsibility & Authority:

Safety Operations Group – is responsible for:

- Communicating regulatory requirements to Executive Management and corporate requirements to Regional Management.
- Initial development, administration of this document and support for the on-going maintenance of regional safety goals.

Regional Management – Responsible for:

- Signing and completing a site-specific Hazard Communication Plan using the Plan Template.
- Implementing the Plan in the Region to all affected employees.
- Managing the List of Chemicals used by crews.
- Maintain and manage the Chemical Inventory for chemicals used by crews using Attachment -**F002**.
- Managing the region's catalog of Safety Data Sheets using SafetySuite.

General Foreperson – Responsible for:

- Reviewing all incoming new chemical Labels and Safety Data Sheets.
- Forward new chemical SDS (GHS Format) to Region's Record-keeper (SafetySuite).
- Communicating to affected employees, new physical or health hazard information, GHS hazard(s) and signal word(s), hazard statement(s) and precautionary risk information.
- Explaining how to access hazardous chemical SDSs through SafetySuite, or by request from the GF.
- Using the Training Outline to train crew members.

- Using a Safety Data Sheet to discuss chemical health and physical hazards and precautionary statement(s) and Personal Protective Equipment.
- Keeping Training Attendance Sign-Off Sheet on file with the Region.
- Ensuring new crew members are trained.

V. Procedure:

Copies of the written Hazard Communication Program and Regional Plan are in SafetySuite.

Hazard Determination

The Company does not intend to evaluate any of the hazardous chemical substances purchased from chemical manufacturers and suppliers, but has chosen to rely upon the evaluations performed by the chemical manufacturers to satisfy the requirements for chemical hazard classification.

OSHA has adopted the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) for determining if a chemical is a hazardous chemical.

1. Chemicals will be assigned by the manufacturer to a chemical hazard class or classes, and a hazard category within each class, based on the properties of the chemical.
2. The lower the number of the hazard category, the more severe the hazard according to the GHS criteria of chemical classification.
3. A Hazardous Chemical is a chemical that has either: a health hazard; a physical hazard; a simple asphyxiant; a combustible dust; a pyrophoric gas or a Hazard Not Otherwise Classified (HNOC).
4. Health Hazard is one that causes any of these effects: acute toxicity; skin corrosion or irritability; serous eye damage / irritation; respiratory or skin sensitization; mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity; aspiration hazard.
5. Physical Hazard is one that poses any of the following effects: explosive; flammable; oxidizer; self-reactive; pyrophoric; self-heating; organic peroxide; corrosive to metals; gas under pressure; flammable gas emitted when reacting with water.

Container Labeling

1. Chemical manufacturers and suppliers will introduce new GHS-compliant labels with pictograms, and signal words. No container of hazardous chemical will be released for use, unless the manufacturer's label is legible, in English and prominently displayed on the container.
2. General Foreperson inspects chemical labeling, it must contain –
    a. **Product Name** (same as found on the SDS)
    b. **Hazard & Precautionary Statements**; **Pictogram**; **Signal Words** for each hazard class;
    c. **Chemical Manufacturer**, address, phone number.
3. All chemicals in drums, pails, bags, cartons, etc. will be checked by the receiving person(s) to ensure the manufacturer's label is intact, legible, and has not been defaced in any manner while shipped.
4. Any container with damaged label will be quarantined until a replacement label has been obtained from the

manufacturer and properly installed.

5. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) regulate the labeling for herbicides, plant growth regulators, or other types of pesticides. Ensure these chemicals have a FIFRA-approved label, which will be considered compliant under this Plan.
6. The crews will not re-label FIFRA-compliant pesticide label.

List of Hazardous Chemicals

1. Chemicals in the workplace have several basic physical forms: solids, liquids, or gases.
2. Region completes the **List of Chemicals / SDS Management** (Attachment - **F002**) for all chemicals used, stored, or otherwise handled by the crew and keeps a copy with the Region. Update the List of chemicals annually.
3. The List of Chemicals shall contain the following information:
    a. **Chemical / Product Name(s)**
    b. **Manufacturer**;
    c. Manufacturer **Phone Contact**; and
    d. **Safety Data Sheet** is available (Yes/No).
4. The List of Chemicals will be uploaded and managed online by the Region in SafetySuite (in Document Library as category - "Chemical Inventory").

Safety Data Sheet (SDS)

1. Safety Data Sheets for hazardous chemicals to which our employees may be exposed during normal use and foreseeable emergencies (a spill), are available in SafetySuite, or by calling the manufacturer.
2. General Forepersons and Forepersons can also obtain the SDSs for crew employees (SDSs are available to all employees).
3. General Forepersons review incoming chemical SDSs for new physical or health hazard information. They communicate new hazard(s) and signal words, hazard / precautionary statements to affected employees.
4. When a GF requests a manufacturer or supplier for a SDS, a record of the request will be maintained. New chemicals will be not be used until a SDS is available. If a SDS is missing sixteen (16) sections or is incomplete, an updated SDS will be requested from the manufacturer.
5. Add new chemicals to the List of Chemicals (Attachment **F002**), and update in SafetySuite.
6. The Region manages their online SDS catalog (in SafetySuite Document Library).
7. Provides SDS to all internal and external customers.

Employee Information and Training

1. The General Forepersons communicates chemical hazard training information to new employees, and prior to working with new hazardous chemical substances. A copy of the plan will be given to all employees during the training meeting. Afterwards, the plan will be available upon request from the General Forepersons.

2. All employees will attend a Hazard Communication training on the following topics:
    a) An overview of the requirements of the Hazard Communication Standard including rights of employees to understand the chemical hazards, and
    b) How to obtain information on hazardous substances in work areas. Identify the product name and manufacturer (See SDS – **Section 1**),
    c) How to read product labels and Safety Data Sheets to obtain the hazard information. The physical and health hazards related to hazardous substances used or stored in a work area; GHS classification and pictograms, signal words and hazard statements (See SDS – **Section 2**),
    d) Emergency and first aid measures to follow if employees are exposed to hazardous substances (See SDS – **Section 4**),
    e) Methods and observation techniques used to determine the presence or the release of hazardous chemicals in the work area (See SDS–**Section 6**),
    f) Handling, storage, and disposal of chemicals (see SDS–**Sections 7 & 13**),
    g) The precautionary work practices and controls, personal protective equipment (PPE) to prevent chemical exposures (See SDS – **Section 8**).
    h) Chemical stability and reactivity (See SDS – **Section 10**).
3. It is important that all employees understand the Hazard Communication information given in the training. If you have any questions regarding this training or the HazCom Plan, please contact your General Foreperson.
4. When new chemical substances are introduced into the workplace, the General Forepersons will review the training topics related to the new chemicals with affected employees.

Hazardous Non-Routine Tasks

1. Employees may be required to perform a non-routine task with a hazardous chemical.
2. Prior to starting work on such a task, GF will instruct each affected employee with information on chemical hazards to which they may be exposed during the an activity. This includes –
    a) Specific chemical hazards,
    b) Personal Protective Equipment (PPE) and safety work measures to be utilized,
    c) The measures the company has taken to lessen the hazards (examples include ventilation, respirators, monitoring or air sampling if appropriate),
    d) First aid and emergency procedures.

Informing Contractors

1. General Foreperson will provide contractors the following information to ensure the contractor works safely in the area:
    a) Identify hazardous chemicals and the Safety Data Sheet (SDS) to share with contractors who may be exposed to the chemical while working with our crew.
    b) The general precautions the contractors' employees must take to lessen the possibility of exposure by using appropriate personal protective measures;
    c) Prohibit smoking, welding and grinding near flammable and combustible materials.
2. The General Foreperson will be responsible for providing the chemical product name(s) and SDS(s) to the

contractor.

3. The Contractor must also supply a GF with the Safety Data Sheet(s) relevant to the chemical(s) prior to use in our work area.
4. Each purchase order issued to outside contractors will contain a statement requesting the Hazard Communication Plan exchange and SDSs for chemical products.

VI. Quality Control:

1. Copies of the written Hazard Communication Program and Regional Plan are in SafetySuite.
2. A completed, signed **List of Chemicals** / SDS (Attachment **F002**) stays with the Region and is uploaded electronically to a Class.
3. Completed Training **Sign-Off Sheets** (Attachment **F004**) are uploaded online, and with the Region.
4. Safety Data Sheets are scanned and uploaded into SafetySuite to the online SDS catalog.
5. Discontinued chemical SDSs are archived in SafetySuite (retention policy: 30 years after last use of a chemical product).

VII. References:

Code of Federal Regulations Title 29, OSHA General Industry - Part 1910, Subpart Z, Toxic and Hazardous Substances (1910.1200)

VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Approved By
6	All	Minor edits for clarity	09-17-2018	Safety Operations Group
7	N/A	Annual	08-30-2019	Safety Operations Group
8	N/A	Annual Program Review	08-30-2020	Safety Operations Group

IX. Attachments:

IH-0009-F002 – List of Chemicals / Safety Data Sheets (SDS)

IH-0009-F003 – GHS Pictograms for Hazardous Chemicals

IH-0009-F004 – Training Outline and Attendance Sign-Off Sheet

X. Plan Approval Signatures:

This Hazard Communication Plan shall be reviewed each year. The Region Manager will be responsible to ensure the Plan is carried out, and is effective. If you have any questions regarding this Plan, please contact the General Foreperson; Regional or Corporate Safety Staff.

Asplundh Tree Expert, LLC		
Manager	**Signature**	**Date**
Bobby King	Bobby King	9/22/21

IH-0009-F002

List of Chemicals / Safety Data Sheets (SDS)
Asplundh Tree Expert, LLC. / Crew Number 059495

Instructions - *list all chemicals used, stored or otherwise handled by the Crews. All fields are required, and indicate if the specific Safety Data Sheet is available.*

	Chemical/ Product Name	Manufacturer	Manufacturer Phone Number	*Is the specific SDS, available in SafetySuite?*
1	Accord XRT II Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
2	Arborchem Basal Oil	Chemorse, LTD	800-424-9300	Yes
3	Arborchem Clean Cut	Chemorse, LTD	800-424-9300	Yes
4	Arborchem Liquid Defoamer	Arborchem	215-659-7922	Yes
5	Arsenal Herbicide	BASF	973-245-6000	Yes
6	Bull's Eye Blue 2 x 2.5	Milliken	864-472-9041	Yes
7	Chemsurf 90	Arborchem	800-424-9300	Yes
8	Dupont Prospective Herbicide	Dupont	800-441-7515	Yes
9	Dupont Streamline Herbicide	Dupont	800-441-7515	Yes
10	Escort XP Herbicide	Bayer CropScience	866-992-2973	Yes
11	Esplanade	Bayer	800-331-2867	Yes
12	Garlon 3A Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
13	Garlon 4 Ultra Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
14	Milestone Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
15	Pathway Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
16	Freelexx Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
17	Rodeo Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
18	Polaris Herbicide	Nufarm	800-345-3330	Yes
19	Stalker Herbicide	BASF	973-245-6000	Yes
20	Tordon K Herbicide	Dow AgroSciences LLC	800-992-5994	Yes
21	41-A Drift Retatdant	Sanitek Products, INC.	323-245-6781	Yes
22	Hot Shot Wasp & Hornet Killer	Spectrum Group	800-917-5431	Yes
23	OFF! Active Insect Repellent	SC Johnson	800-558-5252	Yes
24	Bug Barrier 100	ARI	770-227-8222	Yes
25	BP Unleaded Gasoline	BP	866-427-6737	Yes

Certified by (GF or RSS) Bill Johnson / RSS

Contact Phone # 270-401-4880

Date: 02/25/2020

Signature: Bill Johnson

Date posted to SafetySuite: 02/25/2020

Note: *list more chemical products, by using an additional copy of this attachment.*

IH-0009-F002

List of Chemicals / Safety Data Sheets (SDS)
Asplundh Tree Expert, LLC. / Crew Number 059495

Instructions - *list all chemicals used, stored or otherwise handled by the Crews. All fields are required, and indicate if the specific Safety Data Sheet is available.*

	Chemical/ Product Name	Manufacturer	Manufacturer Phone Number	*Is the specific SDS, available in SafetySuite?*
1	Shell Unleaded Gasoline	Shell	866-897-4355	Yes
2	Marathon Unleaded Gasoline	Marathon	419-421-3070	Yes
3	ExxonMobil Unleaded Gasoline	ExxonMobil	800-567-3776	Yes
4	Valero Unleaded Gasoline	Valero	866-565-5220	Yes
5	Speedway Unleaded Gasoline	Speedway	419-421-3070	Yes
6	BP Diesel Fuel	BP	866-427-6737	Yes
7	Shell Diesel Fuel	Shell Chemical LP	855-697-3887	Yes
8	Marathon Diesel Fuel	Marathon	419-421-3070	Yes
9	ExxonMobil Diesel Fuel	ExxonMobil	800-662-4525	Yes
10	Valero Diesel Fuel	Valero	866-565-5220	Yes
11	Speedway Diesel Fuel	Speedway	419-421-3070	Yes
12	BlueDEF Diesel Exhaust Fluid	Old World Industries LLC	847-559-2000	Yes
13	Motor Oil Synthetic 5W-30	ExxonMobil	800-662-4525	Yes
14	Motor Oil 10W-30	Ashland	800-325-3751	Yes
15	Motor Oil SAE 10W-40	Ashland	800-325-3751	Yes
16	Motor Oil SAE 15W-40 Universal	Ashland	800-325-3751	Yes
17	Diesel Engine Oil 15W-40 All Fleet	Ashland	614-790-3333	Yes
18	Shell Rotella T3 15W-40	Shell	877-242-7400	Yes
19	Delvac Synthetic Gear Oil 75W-90	ExxonMobil	800-662-4525	Yes
20	Hydraulic Oil AW	Napa	800-428-9284	Yes
21	Two Cycle Oil	Stihl	318-524-1100	Yes
22	Bar & Chain Oil	Husqvarna	800-487-5951	Yes
23	Brake Fluid DOT 3	Napa	800-428-9284	Yes
24	Power Steering Fluid	Napa	870-400-3020	Yes
25	Power Steering Fluid w/Stop Leak	RSC Chemical Solutions	704-821-7643	Yes

Certified by (GF or RSS) Bill Johnson / RSS

Contact Phone # 270-401-4880

Date: 02/25/2020

Signature: Bill Johnson

Date posted to SafetySuite: 02/25/2020

Note: *list more chemical products, by using an additional copy of this attachment.*

IH-0009-F002
List of Chemicals / Safety Data Sheets (SDS)
Asplundh Tree Expert, LLC. / Crew Number 059495

Instructions - *list all chemicals used, stored or otherwise handled by the Crews. All fields are required, and indicate if the specific Safety Data Sheet is available.*

	Chemical/ Product Name	Manufacturer	Manufacturer Phone Number	*Is the specific SDS, available in SafetySuite?*
1	Automatic Transmission Fluid	ExxonMobil	800-662-4525	Yes
2	Hi-Temp Grease No. 1	Mystik Lubricants	800-248-4684	Yes
3	Mobil Grease Multi-Purpose	ExxonMobil	800-662-4525	Yes
4	Super Tech Starting Fluid	Spray Products Corp.	610-277-1010	Yes
5	WD-40	WD-40 Company	888-324-7596	Yes
6	PB Penetrating Catalyst (Aerosol)	The Blaster Corporation	216-901-5800	Yes
7	Liquid Wrench Chain & Cable Lube	RSC Chemical Solutions	704-821-7643	Yes
8	Liquid Wrench Dry Lubricant	RSC Chemical Solutions	704-821-7643	Yes
9	Liquid Wrench White Lithium Grease	RSC Chemical Solutions	704-821-7643	Yes
10	Prestone Antifreeze	Prestone Products Corp.	800-890-2075	Yes
11	Antifreeze Coolant 50-50 Prediluted	Napa	847-559-2000	Yes
12	Windshield Washer w/Antifreeze	RSC Chemical Solutions	704-821-7643	Yes
13	Windex	SC Johnson	800-558-5252	Yes
14	Orange Pumice Hand Cleaner	Gojo	+44(0)190-858-8444	Yes
15	Fire Ext. ABC Dry Chemical	Badger Fire Protection	434-964-3200	Yes
16	Method 240SL Herbicide	Bayer Environmental Science	800-331-2867	Yes
17	Casey Jones Hand Sanitizer	Casey Jones Distillery	270-839-9987	Yes
18				
19				
20				
21				
22				
23				
24				
25				

Certified by (GF or RSS) Bill Johnson / RSS

Contact Phone # 270-401-4880

Date: 02/25/2020

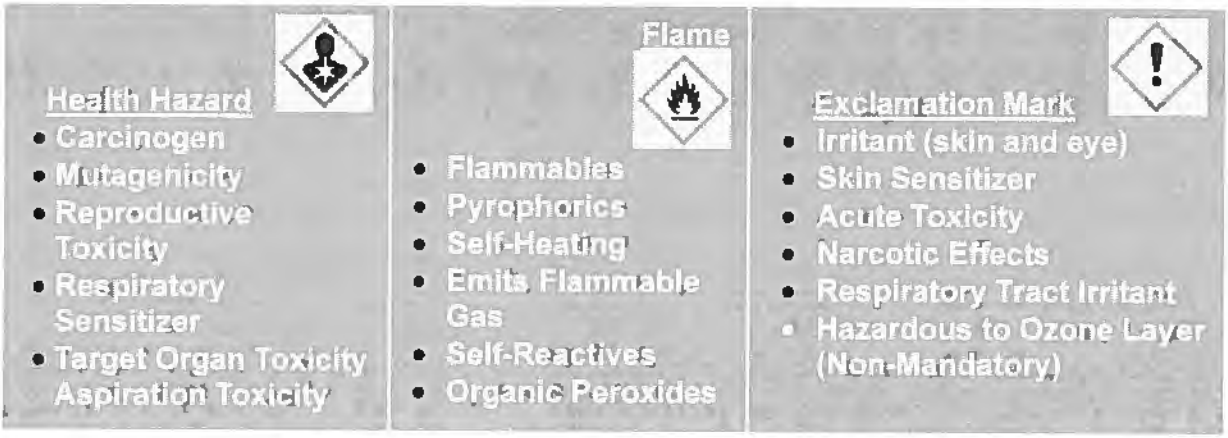
Signature: Bill Johnson

Date posted to SafetySuite: 02/25/2020

Note: *list more chemical products, by using an additional copy of this attachment.*

Global Harmonized System (GHS) Pictograms for Hazardous Chemicals

(IH-0009-F003)



Gas Cylinder

- Gases Under Pressure

Corrosion

- Skin Corrosion/Burns
- Eye Damage
- Corrosive to Metals

Exploding Bomb

- Explosives
- Self-Reactives
- Organic Peroxides

Flame Over Circle

- Oxidizers

Environment (Non-Mandatory)

- Aquatic Toxicity

Skull and Crossbones

- Acute Toxicity (fatal or toxic)

Hazard Communication Training Outline

(IH-0009-F004)

Instructions: communicate the hazards of all chemicals used in the workplace to employees who use, handle, or may be exposed to the chemical, in a foreseeable emergency.

1	***Cover the Global Harmonized System (GHS) Pictograms, precautions and hazard categories for hazardous chemicals*** *(Use Attachment -**F003**).*
2	***This Hazard Communication standard applies –*** *a. to all chemical manufacturers* *b. to chemical importers* *c. to end users, crews, contractors*
3	***Manufacturers of chemicals must label all chemical containers with –*** *a. Product Name or Product Identifier (same Name is found on the Safety Data Sheet)* *b. GHS Hazard & Precautionary Statements; Pictogram; Signal Words for each hazard class;* *c. Chemical Manufacturer, address, phone number.* ***The Manufacturer(s) must –*** *d. Evaluate chemicals they produce or import and classify them according to GHS category.* *e. Prepare Safety Data Sheets in GHS-compliant format, send the SDS to customers.*
4	***Users of Chemicals –*** *a. Inspect all chemical containers for proper labeling; including GHS Hazard & Precautionary Statements; Pictogram; Signal Words* *b. Obtain an updated SDS in GHS format.* *c. Include all Chemicals used, handled or stored on the List of Chemicals (Attachment -**F002**).* *d. Provide access to the SafetySuite SDS catalog, satisfy employee requests for Safety Data Sheets.* *e. Provide HazCom training to affected employees prior to using new chemicals (Use Attachment -**F004**).* *f. Implement the Hazard Communication Plan at work areas where hazardous chemicals are present.*
5	***Training shall include the appropriate sections of a chemical Safety Data Sheet:*** *a. Identify the Chemical substance by Product Name and GHS Product Identifier -**Section 1*** *b. Physical and health hazards identification, GHS pictogram, hazard & precautionary statement -**Section 2*** *c. First aid measures to protect employees from chemical hazards - **Section 4*** *d. Accidental chemical release and emergency procedures - **Section 6*** *e. Chemical handling and storage - **Section 7*** *f. Exposure controls and Personal Protective Equipment - **Section 8*** *g. Stability & reactivity - **Section 10*** *h. Disposal considerations - **Section 13***
6	***Training will describe the purpose of the Hazard Communication Plan, and –*** *a. Notify the employees of work operations where hazardous chemicals are used and stored,* *b. Inform employees how to obtain information on –* *○ Hazard Communication Plan,* *○ Chemical hazards and Safety Data Sheets.*
7	***The Hazard Communication Plan must contain –*** *a. The List of Chemicals used for each work area.* *b. The procedures for training, inspecting chemical labeling and Safety Data Sheets.* *c. The process to evaluate non-routine tasks with hazardous chemicals.* *d. Information exchange with Contractors on chemical hazards and SDSs.*

Asplundh Tree Expert, LLC.

Spill Prevention / Response Policy

I. Introduction:

The Environmental Protection Agency has established guidelines for the management of spills to the environment. It is the company's policy to adhere to all federal and state guidelines on spill management.

II. Purpose:

The purpose of this document is to define the steps to be taken to prevent fuel, oil, solvent or chemical spilling and to ensure spill containment and / or reporting is managed according to the applicable federal and state regulations.

III. Definitions:

Container *– Any portable device, in which a material is stored, transported, disposed of, or treated.*

EPA *– the Environmental Protection Agency has regulatory oversight to prevent pollution from industrial activity impact to land, water and air.*

ERG *- Emergency Response Guidebook, is organized by the federal Department of Transportation. The emergency response guidebook provides safety procedures and directions for what to do during the initial response phase of a hazardous materials (hazmat) incident. The evacuation and protective action distance are shown when a hazardous material is considered toxic to breathing.*

Oil *– substance that has been refined from crude oil, or any synthetic oil, intended for industrial use.*

Work vehicle *– Any vehicle used for work with a potential to leak oil, hydraulic fluid, gas or diesel to the environment. This is not limited to bucket trucks, split-dumps or GF trucks and also include specialized equipment such as Skytrims, tractors and ROW mowers etc.*

IV. Responsibility & Authority:

Safety Operations Group – The group is responsible for:

- Communicating regulatory requirements to Executive Management and corporate requirements to Regional Management.
- Initial development, administration of this document and support for the periodic review of safety goals.
- Auditing corporate safety goals relative to the region's operation and services.

Executive Management – Responsible for:

- Supporting the safety process, including training and work analysis, and ensuring that the necessary resources are made available.

Regional Management – Responsible for:

- Focusing on proactive activities that reduce the risk of spills or contamination.
- Provide necessary resources for training, and spill prevention materials, etc.
- Developing procedures for specific waste streams within their area of operations.
- Implementing all facets of this policy in their respective areas.

Employees and Contractors – Responsible for:

- Abiding by all regional and corporate policies and procedures.

V. Spill Management Policy

A. Spill Prevention

On the Job Briefing, discuss the **hazards of working with herbicide chemicals and / or oils -**

a) Detail the scope of work, and risk of spills or leaks with this work;
b) Discuss the use of chemicals, and what could go wrong;
c) Store chemicals in properly closed containers, not exposed to storm water, to minimize spills;
d) Chose the barriers you must put in place to eliminate or reduce the risk of a spill;
e) Estimate the distance or flow paths to water bodies (ditch; drains; retention basin; streams, rivers etc.);
f) Note the location for the universal spill control kit with absorbent pads, socks, and disposal bag.

In general, **perform equipment checks on mobile equipment** as follows -

a) Inspect equipment at the beginning of a shift, at the end of a shift and when the work scope changes.
b) Inspect hydraulic equipment before use, know the locations of shut-off valves and have defective equipment repaired BEFORE it fails.
c) Make every effort to park and / or stage equipment more than 125 feet away from water bodies.
d) Take precautions to prevent leaks from reaching water/drains, when working near water or yard drains.

Equipment refueling should take place more than 125 feet from bodies of water whenever possible. When not possible, extra precautions shall be taken to avoid spills. Refueling *must be attended* through the entire refueling operation. Proper precautions must be taken to *prevent the spilling of any fuel, hydraulic or other fluids*:

a) Place a bucket / containment under the refueling nozzle, as applicable.
b) Have absorbent pads / socks, kitty litter™ etc. readily available.
c) Place containment under mobile equipment and refueling truck, as applicable.

Universal spill control kit *shall* be available on your **work vehicle** (example: universal spill control kit with absorbent pads and socks; disposal bags, in a kit or container etc.).

- It is recommended that work vehicles *be* equipped with a leak proof container, and kitty litter™ to help contain a leak.
  For example: a (5) gallon bucket is a suitable containment method for a leaking (2.5) gallon jug.
- All spray equipment *shall be* equipped with a universal spill control kit.

Contain leaking oil-filled equipment, properly bag or wrap oil-filled equipment for transport. It may be necessary to pump the oil from the leaking unit in some cases. Provide containment or construct temporary berms under portable oil-filled equipment, when used outside.

If there is a spill, first protect yourself. Train employees to use the spill response **S-W-I-M Process** -

a) ***S – Secure*** the area.
b) ***W – Warn*** others to leave the area.
c) ***I – Inform***, contact Regional Management IMMEDIATELY. Timely reporting of environmental spills is essential, do not delay in gathering information. Immediately - notify your regional safety staff and regional management and / or manager.
d) ***M – Monitor*** the area, keeping others not involved away, until qualified help arrives.
e) Follow the **Incident Investigation Procedure** as outlined in the Incident Management Guide (IMG).

B. Spill Reporting

Before attempting to contain any spill, follow the proper **PPE** from the SDS **Section 8**, and follow all precautions mentioned in the SDS and / or on the product label.

Follow the **Incident Management Guide** (IMG) for spill event reporting. The Regional Manager, or designee will determine whether to report a spill to an agency, after consultation with the Sponsor.

1. If your Region uses a **SPCC** plan, follow the facility-specific Spill Prevention Controls & Countermeasures Procedure.

2. In order to ensure the protection of human health and the environment, Federal and State Environmental Laws require that *certain types of spills and unpermitted releases be reported* to the proper regulatory agencies, as soon as possible following discovery.

3. Immediately notify your regional management when a spill or unpermitted release is discovered, If you are unable to reach the Regional Safety Staff, contact the Regional Manager. The Corporate Safety Consultant may be called to assist in the environmental incident investigation, as needed.

4. In some cases, certain spills are reported to a government environmental agency, in a timely manner. There are types of spills that may require regulatory reporting. These are examples of reportable spills:
   a) ***An oil spill in any quantity, to navigable water*** **- an oil sheen or film on the water surface counts!**
   b) ***Any oil spilled to land within 100 feet of a water body.***
   c) ***An oil spill to soil greater than 25 gallons.***
   d) ***A hazardous chemical release to land or water.***

5. Have the following information available when making the agency notification –

a) Location of the spill / release – facility name, address and location on-site.
b) Date and time discovered.
c) Your name and phone number (person reporting the spill).
d) What has spilled? The chemical name and percentages are listed in the Safety Data Sheet - **Section 3**.
e) Estimate the released volume into the environment. What was the volume for the original container?
f) Where has the hazardous material been released (to land / to water / to air / or multiple)?
g) Has the spill reached a drain or a waterway? Does it have the potential to reach a drain or waterway?
h) What health risks / environmental release measures exists (refer to SDS **Section 2** AND **Section 6**).
i) What spill containment actions, have been taken?
j) Is there spill absorbent material and pads / socks, and plastic liners with a proper container for disposal?

Note: within 24 hours, create an initial Safety Suite Event Record for the Spill Event.
All **Reportable Spills** will require a **Formal Incident Investigation** with **Root Cause Analysis** per the IMG.

C. Spill Containment / Initial Response

1. Only perform **spill containment** activities if it is safe to do so and with proper PPE.
2. Do not attempt **spill cleanup** if you have not been trained in OSHA HAZMAT cleanup procedures.
3. Ensure the event has been reported to regional management, using the Incident Management Guide.
4. For initial spill response, have the chemical substance's **Safety Data Sheet** handy.
5. Refer to the **Emergency Response Guide** App (**ERG** is an approved Company App).

6 If the region has a **SPCC Plan** - follow that Procedure
7 Identify the source of spill and determine the associated hazards using the chemical s Safety Data Sheet and using the Emergency Response Guide or ERG 2016 APP from Airwatch Catalog
8 Consider the type and amount of spilled materials the location and weather conditions, to determine the best method for spill containment
9 If flammable or combustible materials are spilled eliminate all ignition sources DO NOT hose down the area
10 If safe to do so - close the valves that are leaking fluid
11 Use the tools, equipment and materials that are readily on hand in a spill kit (absorbent material or pads) to Confine the spill as quickly as possible to minimize any environmental impact You can use sawdust, Kitty Litter or special absorbent products made to do this
12 *For Major Spills* larger than 5 gallons of chemical attempt to safely contain the spill AND then immediately call your General Foreperson and / or **CHEMTREC** at **1-800-424-9300** – this phone number - *shall be* noted on the Job Briefing for Spray Crews
13. *OSHA requires those responding to clean up the spill be trained in hazardous materials response (HazMat)* Call a Hazardous Material Team to assist in the **spill cleanup** and place the contaminated materials into a leak-proof plastic bag/container labeled "Hazardous Material"
14 Once the spill is contained, the state-licensed Hazmat Team shall dispose of the waste materials in accord with state and federal environmental laws and regulations

VI. Quality Control - N/A

VII. References - N/A

VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Reviewed By
0	All	New Document	08/28/2018	N Volwieder, CSP

IX. Attachments:

ENV-0006-F001 (Universal Spill Control Kit – minimum contents)

X. Approval Signatures:

Approver's Name	Position Title	Signature
Bruce Mellott	VP, Corporate Safety	

Universal Spill Control Kit – minimum contents

ENV-0006-F001

Minimum Contents in a Universal Spill Control Kit	
Multiple sorbent pads	(min. 10 per kit)
Multiple sorbent socks	(min. 2 per kit)
Disposable bag – industrial grade	(min. 1 per kit)
Pair of chemical resistant gloves	(one pair min.)
Option - Pair of safety goggles	(if included in the kit)
Option - Plastic container with a lid	(if sold with the kit)

Asplundh Tree Expert, LLC.

Personal Protective Equipment – General

I. Introduction:

Engineering and administrative controls shall be employed whenever possible to eliminate hazards or remove personnel from exposure to hazards. Personal Protective Equipment (PPE) is a last line of defense Although it can prevent and mitigate injuries in many cases, usage of PPE has some limitations.

The use of anti-contamination clothing, respiratory protection (as per SDS and/or MFR requirements), communications equipment, etc shall not preclude use of PPE where required

PPE other than Company standard issue, shall not be permitted

In cases where the correct PPE is not obvious, contact the Corporate Safety representative assigned to your Region. The appropriate PPE hazard assessment attachments may be used to guide employees to the correct PPE choice, per job activity.

II. Purpose:

The purpose of this procedure is to provide guidance for the general use of Personal Protective Equipment. PPE shall be offered at no cost to employees

III. Definitions:

American National Standards Institute (ANSI) *develops specifications for various types of PPE (gloves. footwear, eyewear, and headwear) and for measuring their effectiveness and quality*

American Society for Testing and Materials (ASTM) *develops specifications for electrical equipment and PPE. (Though ANSI and the ASTM do not have regulatory authority, several of their industry consensus standards have been incorporated into OSHA rules by reference)*

Hazard Assessment: *The hazard assessment is a process (required by law) of identifying the hazards associated with a defined task and prescribing Personal Protective Equipment along with other relevant protection measures which must be employed to reduce the risk from the hazards Corporate Safety in conjunction with Regional Safety Staff assess the work assignment. The goal is to determine hazards present or likely to be present and required use of personal protective equipment*

Certification of Hazard Assessment: *written document detailing the hazard assessment for particular tasks. This certification of hazard assessment should be reviewed at least annually and updated anytime a new task, which presents a hazard, is introduced.*

IV. Responsibility & Authority:

Corporate Safety – is the program coordinator, the group is responsible for:

- Communicating regulatory requirements to Executive Management and corporate requirements to Executive and Regional Management.
- Developing company goals and objectives for safety performance
- Coordinating the performance of PPE hazard assessments, as needed.
- Certifying the PPE hazard assessments.
- Serving as the technical resource on PPE issues, including researching proper material specifications for hazard assessments.
- Reviewing changes and/or additions to the type of PPE approved for use.

Executive Management – Responsible for:

- Supporting the safety process, including training and work analysis, and ensuring that the necessary resources are made available.
- Ensuring that the policies and compliance of policies are communicated and adhered to down the production chain of command – Sponsor to Manager to Supervisor, etc.

Regional Management – Responsible for:

- Maintaining training records and hazard assessment files, as needed
- Ensuring personnel have ready access to the PPE they will need to safely perform their job.
- Providing training to their employees on specific PPE requirements.
- Monitoring the employees' PPE use practices.
- Providing retraining if deficiencies are noted.
- Ensuring that the company policies and procedures are in place and followed in their area(s) of control.
- Ensuring that the employees which they are responsible for, are effectively trained on the policies and procedures.
- Recognizing change in procedures or the work area that would require a new or updated PPE hazard assessment and initiating the hazard assessment
- Providing appropriate storage areas for PPE.

Employees – Responsible for:

- Adhering to the requirements set forth in this procedure.
- Inspecting required PPE daily and prior to each usage as well as requesting replacements when needed.
- Properly using reliable PPE which is required for specific areas or specific tasks.
- Properly maintaining, cleaning, decontaminating, and storing PPE in sanitary conditions.
- Assisting as requested, in PPE hazard assessments.
- Notifying Regional Management of opportunities for improvement associated with Personal Protective Equipment.

Procedure:

PPE Hazard Assessment shall be completed:

- For changes in operations or conditions that would necessitate any change to the required PPE, including non-routine operations.
- For any NEW operation or task where exposure to hazards may warrant the use of PPE.
- For any existing operation or task where PPE documentation does not exist or is considered inadequate (and where the exposure to hazards may warrant the use of PPE)
- The team (to include Corporate Safety, directly or indirectly) doing the documented Hazard Assessment should involve people familiar with the task and the area hazards.

PPE Hazard Assessment Certification:

- The results of the PPE hazard assessment shall be documented (see the attachments to this Policy).
- Corporate Safety reviews and certifies the PPE hazard assessment
- Regional Safety may add tasks and select the PPE for the task that is at least as protective as the PPE stated in the Corporate Certified PPE hazard assessments.

PPE Specifications:

- Once specifications for PPE are established, they may not be modified or substituted without being approved by Corporate Safety.
- Safety glasses with side protection and goggles will be ANSI Z87.1 rated.
- Hardhat protection will be ANSI Z89.1; Class E rated, Type I or II.
- Hand glove protection will be at a minimum, rated A4 Cut Resistant (per ANSI/ISEA 105-2016 Standard) for tasks with potential for cuts or laceration hazards.
- Footwear work boots shall be above the ankle, lace up, with rubber or composited soles with good tread, safety toe shoes are recommended. (Rubber boots for chemical application, wet and or muddy conditions or snow/cold insulation needs, are permitted. Rubber boots should have steel shank when possible.
- Chainsaw chaps or pants will be UL Rated, ASTM F1897-14 (Chaps will be full wrap for the lower leg and have front coverage no less than 3 inches from the chap or pant belt line).
- Temporary Traffic Control Vests must be Class III, as defined in ANSI / ISEA 107-2015. Class III attire and/or vest shall be worn if working within 15 feet of roadway Class III pants will be worn in flagging operations as regulations dictate. In all circumstances that vests are utilized they must be Class III.
- A DOT-rated helmet. with side impact protection is needed when driving / riding in the UTV or ATV
- PPE is to be selected based on an employee's individual fit.
- PPE is to be provided, used and maintained in a sanitary and reliable condition

PPE Storage:

- PPE Shall be stored in a manner to avoid possible damage or contamination.
- Contaminated or potentially contaminated PPE shall not be stored in the same compartment, container etc., as clean PPE, clothing, food, or other articles to avoid contamination.

Training Requirements:

- New employees shall be trained, during their NELO orientation, on the "basic" PPE that they will use.
- New employees assigned to an area where PPE such as gloves, respirators (as per SDS and/or MFR requirements) etc. are part of their job, shall be trained on these prior to being allowed to perform these tasks.
- PPE training topics will include inspection, maintenance, proper donning, use and limitations of using the PPE.
- If work tasks changes, PPE changes (new or modified operation), all affected employees shall be appropriately trained.
- If an employee does not exhibit the necessary skills or knowledge in regard to their PPE-wearing practices, then they shall be retrained.
- If a worker has not been trained on a skill or task, then the employee shall be trained prior to being assigned said task.
- If a worker has not performed the skill or task within the past 12 months, then the employee shall be trained or refreshed prior to being assigned said task. Also training or refreshment on proper use of any specific PPE to a specific task shall be done prior to commencement of the work.

Wearing Apparel

- Individuals shall wear suitable clothing to adequately protect the body and extremities.
- Clothing requirements will be determined by the Hazard Assessment process, work type and climate.
- Loose clothing shall not be worn where it can come into contact with or catch on machinery, moving parts, or other hazards of this type.
- Any PPE that is found to be damaged or defective in any manner will be immediately taken out of service and replaced. **If PPE found to be damaged or defective the employee will stop doing the task that the PPE is required for, to prevent exposure until replacement PPE is provided.**

V. Quality Control: N/A

VI. References:

29 CFR 1910.132—General Requirements
29 CFR 1910.133—Eye and Face Protection
29 CFR 1910.135—Head Protection
29 CFR 1910.136—Foot Protection
29 CFR 1910.138—Hand Protection
29 CFR 1910.140—Personal Fall Protection Systems

ANSI / ISEA 105-2016	American National Standard for Hand Protection Classification
ANSI / ISEA 107-2015	American National Standard for High-Visibility Safety Apparel and Accessories
ANSI Z87.1-2015	American National Standard for Occupational and Educational Personal Eye and Face Protection Devices
ANSI Z89.1-2014	American National Standard for Industrial Head Protection
ASTM F1897-14	Standard Specification for Leg Protection for Chain Saw Users
ASTM F2413-11	Standard Specification for Performance Requirements for Protective (Safety) Toe Cap Footwear
SAF-0008-F001	(Quantitative Hazard Risk Assessment Method) in Safety Suite Library

Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Approved By
0	All	New Document	1/31/17	Adam Martin, CSP
1	F002	Certification of PPE Assessment	09/07/17	Neil Volwieder, CSP
2	All	PPE Hazard Assessments	10/30/18	Neil Volwieder, CSP
3	All	Class III Vest, Leg, Foot, Hand requirements	10/1/19	Bruce Mellott, VP, CSP

VII. Attachments:

SAF-0008-F002 (Ground Person - PPE Hazard Assessment Certification)
SAF-0008-F003 (Ground Trimmer - PPE Hazard Assessment Certification)
SAF-0008-F004 (Bucket / Tree Trimmer - PPE Hazard Assessment Certification)
SAF-0008-F005 (Herbicide Sprayer - PPE Hazard Assessment Certification)

VIII. Approval Signatures:

Approver's Name	Position Title	e-Signature
Bruce Mellott	VP, Corporate Safety	

Ground Person - PPE Hazard Assessment Certification

SAF-0008-F002

Job Title Assessed: Ground Person	**Hazard Assessment Team** Name / Title: Tracy Hawks *Training Manager* Name / Title: Joe Kern *Sr. Training Specialist* Name / Title: Mark Foster *Sr. EHS Specialist* Name / Title: Neil Volwieder *Sr. EHS Specialist*	
Certification of Hazard Assessment	Certifier Name: Neil Volwieder, CSP	**Date of Hazard Assessment:** 10/30/18

Eye & Face, Hearing Protection Assessment

Personal protective equipment such as special hard hats, safety glasses with side protection (may be tinted), can protect workers from the hazards of flying fragments, large chips, sparks, optical light, chemical splashes, as well as objects, particles, sand, dirt, mists, and dusts.

Rated hearing protectors with high NRR offer protection from exposure to noise.

Is there potential for eye, face, ear injury from:	*Yes/ No Possible*	*Describe the Hazard*	*Eye, Face, Ear Protection*
Impact - Flying Particles (chips, dirt, sand etc.)	Yes	Wood chips hit eye	*Safety glasses with side protection (ANSI Z87 1+)(+ signifies impact rated for the potential impact hazard)*
Impact - Falling or Fixed Objects	Yes	Hits or pokes eye	
Chemical Splash – Corrosive Liquids	Yes	Splash while transfer or apply chemical.	*Safety glasses with side protection, wrap-around design and foam lined; or safety goggles (ANSI Z87.1).(D3 rating per ANSI Z87 standards for potential splash hazards.) Face Shield per SDS/MFR requirements*
Optical Light / Strong Glare	Possible	Glare impairs eye sight	*Tinted safety glasses with side protection (ANSI Z87.1)*
Blood-Borne Pathogens (BBP)	Unlikely	BBP liquids splash eyes	*Safety goggles or safety glasses with side protection (ANSI Z87.1)*
Noise – at or above 85dB time weighted average (TWA).	Yes	Exposed ≥ 85db on time weighted average (TWA)	*Ear plugs, or earmuffs (with high enough NRR rating to reduce noise below 85db)*
Other hazard(s):_____			

Ground Person PPE Hazard Assessment Certification (continues)

Head Protection Assessment

Hard hats can protect the head from impacts, such as those caused by falling or flying objects, fixed objects, or from penetration injuries, and from electrical contact. Workers cover and protect long hair to prevent it from getting caught in moving parts of machines.

Is there potential for head injury from:	*Yes/ No Possible*	*Describe the Hazard*	*Head Protection*
Impact – Wood Debris	Yes	Wood debris hits the head	*Hardhat Protection (ANSI Z89 1, Class E Rated, Type I or II)* *Helmet Type I - protects the top of the head from impact.* *Helmet Type II - protects the top and sides of the head from impact*
Impact - Falling or accidental dropped object or tools	Yes	Limb, object or tool hits the head	
Impact - Fixed Objects	Yes	Bumping hazard on tree or machine parts	
Electrical Conductors	Unlikely	Come too close to conductors (i.e. storm)	
Low-Hanging Objects	Yes	Hit a lower limb	
Impact – riding a motorized ATV / UTV	Possible	Bumping head on ATV / UTV	*DOT-rated Helmet with side impact protection*
Other hazard(s): _____			

Foot & Leg Protection Assessment - In addition to foot guards and work shoes, leggings (e.g., appropriate material) can help prevent injuries by protecting workers from hazards such as falling or rolling objects, chainsaws, sharp objects, wet and slippery surfaces, and hot surfaces.

Is there potential for foot injury from:	*Yes/ No Possible*	*Describe the Hazard*	*Foot Protection*
Impact - Flying Particles Impact – Falling or Flying Particles	Yes	Wood pieces or Limb falls on leg or foot	*Leather work boot specifications:* • *above the ankle,* • *full lace up* • *aggressive tread,* • *well-defined heel* *Safety Toe boots are recommended* Rubber boots for wet and or muddy conditions or snow/cold insulation needs, are permitted, should have Steel Shank when possible.
Impact - Fixed Objects	Yes	Stumble into stationary object	
Sprain - Rolling objects	Yes	Walk over debris	
Cuts & Laceration	Yes	Cut by hand tools.	
Punctures - Objects piercing the sole	Yes	Walk or land on sharp metal object	
Slips & Trips - Wet or muddy conditions	Possible	In wet condition, slip on terrain	
Other hazard(s): _____			

Ground Person PPE Hazard Assessment Certification (continues)

Hand Protection Assessment

Hand protection benefit workers exposed to severe cuts or lacerations, severe abrasions, thermal burns, and harmful temperature extremes. There may be occasional exposure to hazardous chemicals and rare exposure to blood-borne pathogens.

Is there potential for hand injury from:	*Yes/ No Possible*	*Describe the Hazard (example)*	*Hand Protection*
Cuts, Lacerations, Abrasions, and Punctures	Yes	Sharpen chainsaw	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Thermal Burns	Yes	Touch hot muffler or machine parts	*Heat resistant, synthetic or leather work gloves*
Dermatitis – caused by poisonous plants (ivy; sumac)	Possible	Allergic reaction	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Cold Weather / Freezing	Possible	Work in freezing conditions	*Insulated option - Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Chemicals – Absorption of Hazardous Substance.	Possible	Spot application of herbicide	*Glove PPE rating per FIFRA Label instructions.*
Blood-Borne Pathogens (BBP)	Possible	Splashed by BBP liquid	*Nitrile gloves (in First Aid Kit)*
Other hazard(s):_____			

Work Clothing Protection Assessment

In some cases, workers must shield most or all of their bodies against hazards at work, such as exposure to moving traffic in Work Zones and fall from heights. Exposures to corrosive chemicals may occasionally exist and unlikely potential for exposure to blood-borne pathogens. Materials used in whole-body personal protective equipment include rubber, leather, synthetics, and plastic.

Is there potential for bodily injury from:	*Yes/ No Possible*	*Describe the Hazard (example)*	*Work Clothing Protection*
Struck by traffic on the ground	Yes	Traffic don't see employee.	*Class III Vest or Class III Apparel*
Chemicals – corrosive or hazardous	Yes	Applying herbicide	*PPE and clothing per FIFRA herbicide label instructions.*
Dermatitis – caused by poisonous plants (ivy; sumac)	Possible	Allergic reaction	*Long pants; shirt with Long sleeves*
UV Sun Exposure	Possible	Sun Burn	*Long pants; shirt with Long sleeves.*
Handling heavy, sharp, or rough materials	Yes	Branch or limbs into chipper	*Durable work pants.*
Other hazard(s):_____			

Note: *Follow all Equipment Manufacturer's recommended PPE to be worn.*

Ground Trimmer - PPE Hazard Assessment Certification

SAF-0008-F003

Job Title Assessed: Ground Trimmer	**Hazard Assessment Team** Name / Title: Tracy Hawks *Training Manager* Name / Title: Joe Kern *Sr. Training Specialist* Name / Title: Mark Foster *Sr. EHS Specialist* Name / Title: Neil Volwieder *Sr. EHS Specialist*	
Certification of Hazard Assessment	Certifier Name: Neil Volwieder, CSP	**Date of Hazard Assessment:** 10/30/18

Eye & Face, Hearing Protection Assessment

Personal protective equipment such as hard hats, safety glasses with side protection (may be tinted), can protect workers from the hazards of flying fragments, large chips, sparks, optical light, chemical splashes, as well as objects, particles, sand, dirt, mists, and dust.

Rated hearing protectors with high NRR offer protection from exposure to noise.

Is there potential for eye, ear injury from -	*Yes/ No Possible*	*Describe the Hazard (example)*	*Eye, Ear Protection*
Impact - Flying Particles (chips, dirt, sand etc.)	Yes	Wood chips hit eye	*Safety glasses with side protection (ANSI Z87.1+)(+ signifies impact rated for the potential impact hazard)*
Impact - Falling Objects	Yes	Hits eye	
Impact - Fixed Objects	Yes	Poke eye	
Chemical Splash – Corrosive Liquids	Yes	Splash while transfer or apply chemical.	*Safety glasses with side protection, wrap-around design and foam lined; or safety goggles (ANSI Z87.1) (D3 rating per ANSI Z87 standards for potential splash hazard.) Face Shield as per SDS/MFR requirements*
Optical Light / Glare	Possible	Glare impairs eye sight	*Tinted safety glasses with side protection (ANSI Z87.1)*
Blood-Borne Pathogens (BBP)	Unlikely	BBP liquids splash eyes	*Safety Goggles or Safety glasses with side protection (ANSI Z87.1)*
Noise – at or above 85dB time weighted average (TWA).	Yes	Exposed ≥ 85db on time weighted average (TWA)	*Ear plugs, or earmuffs (with high enough NRR rating to reduce noise below 85db)*
Other hazard(s):_____			

Ground Trimmer - PPE Hazard Assessment Certification (Continues)

Head Protection Assessment - Hard hats can protect the head from impacts, such as those caused by falling or flying objects, fixed objects, or from penetration injuries, and from electrical contact.

Is there potential for head injury from -	*Yes/ No Possible*	*Describe the Hazard (example)*	*Head Protection*
Impact – Wood Debris	Yes	Wood debris hits head	*Hardhat Protection (Class E Rated, Type I or II).* *Helmet Type I - protects the top of the head from impact.* *Helmet Type II - protects the top and sides of the head from impact.*
Impact - Falling or accidental dropped object or tools	Yes	Limb or piece hit head	
Impact - Fixed Objects	Yes	Bumping hazard on tree or machine parts	
Electrical conductors	Unlikely	Prevent accidental contact (i.e. storm)	
Low-hanging objects	Yes	Hit a lower limb	
Impact – riding a motorized ATV / UTV	Possible	Bumping head on ATV / UTV	*DOT-rated Helmet with side impact protection*
Other hazard(s):_____			

Foot & Leg Protection Assessment - In addition to foot guards and work shoes, chainsaw chaps (rated, of appropriate material) can help prevent injuries by protecting workers from hazards such as falling or rolling objects, chainsaws, sharp objects, wet and slippery surfaces, hot equipment or cold weather conditions.

Is there potential for foot or leg injury from -	*Yes/ No Possible*	*Describe the Hazard (example)*	*Foot & Leg Protection*
Impact – Falling or Flying Particles	Yes	Wood piece, or Limb falls on leg or foot	*Leather work boot specifications* • *above the ankle,* • *full lace up* • *aggressive tread,* • *well-defined heel* *Safety Toe boots are recommended* Rubber boots for wet and or muddy conditions or snow/cold insulation needs, are permitted, should have Steel Shank when possible.
Impact - Fixed Objects	Yes	Stumble into stationary object	
Sprain - Rolling objects	Yes	Walk over debris	
Cuts & Laceration	Yes	Cut using tools	
Punctures - Objects piercing the sole	Yes	Walk or land on sharp metal object	
Slips & Trips - Wet or muddy conditions	Possible	In wet condition, slip on terrain	
Chainsaw	Yes	Chainsaw kickback to leg	*Chainsaw Chaps or Protective Pants, Full Wrap around - lower leg has a flap that wraps around the lower leg. (UL Rated, ASTM F1897-2014 resists chain speed of up to 2,750 ft./min)*
Chemical Splash	Possible	Mixing or apply herbicide to foot	*Rubber, chemical resistant, coated work boot AND meets boot specifications above.*
Other hazard(s):_____			

Ground Trimmer PPE Hazard Assessment Certification (Continues)

Hand Protection Assessment

Hand protection benefit workers exposed to severe cuts or lacerations, severe abrasions, thermal burns, and harmful temperature extremes. There may be an occasional exposure to hazardous chemical, and an unlikely rare exposure to blood-borne pathogens.

Is there potential for hand injury from:	*Yes/ No Possible*	*Describe the Hazard (example)*	*Hand Protection*
Cuts, Lacerations, Abrasions, and Punctures	Yes	Sharpen chainsaw.	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Thermal Burns	Yes	Touch hot muffler or machine parts	*Heat resistant, synthetic or leather work gloves*
Dermatitis – caused by poisonous plants (ivy; sumac)	Possible	Allergic reaction	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Cold Weather / Freezing	Possible	Work in freezing conditions	*Insulated option - Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Chemicals – Absorption of Hazardous Substance.	Possible	Applying herbicide	*Glove PPE rating per FIFRA Label instructions.*
Blood-Borne Pathogens (BBP)	Possible	Splashed by BBP liquids.	*Nitrile gloves (in First Aid Kit)*
Other hazard(s):_____			

Work Clothing Protection Assessment

In some cases, workers must protect their bodies against hazards at work, such as moving traffic in temporary traffic work zones. Exposure to herbicide chemical may occur, or very infrequently to blood-borne pathogens Materials used for whole-body personal protective equipment include: synthetics and high visibility synthetic fibers.

Is there potential for bodily injury from:	*Yes/ No Possible*	*Describe the Hazard (example)*	*Work Clothing Protection*
Struck by traffic on the ground	Yes	Traffic don't see employee.	*Class III Vest* or *Class III Apparel*
Chemicals – corrosive or hazardous	Yes	Applying herbicide	*PPE and clothing per **FIFRA** herbicide label instructions*
Handling heavy, sharp, or rough materials	Yes	Handle tree branch or limbs	*Durable work pants.*
Dermatitis - caused by plants (Poison Ivy; or sumac)	Possible	Allergic reactions	*Long pants; shirt with Long sleeves*
UV sun exposure	Possible	Sun burn	*Long pants; shirt with Long sleeves*
Other hazard(s):_____			

Note: *Follow All Equipment Manufacturer's recommended PPE to be worn.*

Bucket / Tree Trimmer - PPE Hazard Assessment Certification

SAF-0008-F004

Job Title Assessed: Bucket / Tree Trimmer	**Hazard Assessment Team** Name / Title: Tracy Hawks *Training Manager* Name / Title: Joe Kern *Sr. Training Specialist* Name / Title: Mark Foster *Sr. EHS Specialist* Name / Title: Neil Volwieder *Sr. EHS Specialist*	
Certification of Hazard Assessment	Certifier Name: Neil Volwieder, CSP	**Date of Hazard Assessment:** 10/30/18

Eye & Face, Hearing Protection Assessment

Personal protective equipment such as special hard hats, safety glasses with side protection can protect workers from the hazards of flying fragments, wood dust, sparks, optical light or glare, as well as objects, particles, sand, dirt or mist.

Rated hearing protectors with high NRR offer protection from exposure to noise.

Is there potential for eye, face, ear injury from -	***Yes/ No Possible***	***Describe the Hazard (example)***	***Eye, Face, Ear Protection***
Impact - Flying Particles (saw dust etc.)	Yes	Particles hits eye	*Safety glasses with side protection (ANSI Z87.1+) (+ signifies impact rated for the potential impact hazard)*
Impact - Falling Objects	Yes	Branch hits eye	
Impact - Fixed Objects	Yes	Poke eye	
Optical Light / Glare	Possible	Glare impairs eye sight	*Tinted safety glasses with side protection (ANSI Z87.1)*
Blood-Borne Pathogens (BBP)	Unlikely	BBP liquids splash eyes	Safety Goggles or Safety glasses with side protection (ANSI Z87.1) *(D3 rating per ANSI Z87 standards for potential splash hazard.)* Face Shield as per SDS and MFR requirements
Noise – at or above 85dB time weighted average (TWA).	Yes	Exposed ≥ 85db on time weighted average (TWA)	*Ear plugs, or earmuffs (with high enough NRR rating to reduce noise below 85db)*
Other hazard:_____			

Bucket / Tree Trimmer PPE Hazard Assessment Certification (Continues)

Head Protection Assessment

Hard hats can protect the head from impacts, such as those caused by falling or flying objects, fixed objects, or from penetration injuries, and from electrical contact. Workers cover and protect long hair to prevent it from getting caught in equipment or in moving parts.

Is there potential for head injury from -	*Yes/ No Possible*	*Describe the Hazard (example)*	*Head Protection*
Impact – Wood debris	Yes	Wood debris hit head	*Hardhat Protection (ANSI Z89.1, Class E Rated, Type I or II).* *Helmet Type I - protects the top of the head from impact.* *Helmet Type II - protects the top and sides of the head from impact*
Impact - Limbs or parts of machine	Yes	Bumping hazard	
Electrical Conductors	Unlikely	Prevent accidental contact (i.e. storm)	
Low-Hanging Objects	Yes	Hit a limb	
Other hazard:_____			

Foot & Leg Protection Assessment - In addition to foot guards and work shoes, chainsaw chaps (rated, of appropriate material) can help prevent injuries by protecting workers from hazards such as falling or rolling objects, chainsaws, sharp objects, wet and slippery surfaces, hot equipment or cold weather conditions.

Is there potential for foot or leg injury from -	*Yes/ No Possible*	*Describe the Hazard (example)*	*Foot & Leg Protection*
Impact – Falling or Flying Particles	Yes	Wood pieces, or Limb falls on leg or foot	*Leather work boot specifications:* • *above the ankle.* • *full lace up* • *aggressive tread,* • *well-defined heel* *Safety Toe boots are recommended* Rubber boots for wet and or muddy conditions or snow/cold insulation needs, are permitted, should have Steel Shank when possible.
Impact - Fixed Objects	Yes	Gaffs spike foot	
Sprain - Rolling objects	Yes	Stumble in tree	
Cuts & Laceration	Yes	Cuts using tools	
Punctures - Objects piercing the sole	Yes	Place foot or land on sharp object	
Slips & Trips - Wet conditions	Possible	slip from branch in wet condition	
Chainsaw	Yes	Kickback to legs	*Chainsaw Chaps or Protective Pants,* ***Full Wrap around*** *- lower leg has a flap that wraps around the lower leg.* *(UL Rated, ASTM F1897-2014 resists chain speed of up to 2,750 ft./min)*
Other hazard:_____			

Bucket / Tree Trimmer PPE Hazard Assessment Certification (Continues)

Hand Protection Assessment

Workers exposed to severe cuts or lacerations, severe abrasions, thermal burns, and harmful temperature extremes benefit from hand protection. A rare exposure to blood-borne pathogens could exist.

Is there potential for hand injury from:	*Yes/ No Possible*	*Describe the Hazard (example)*	*Hand Protection*
Cuts, Lacerations, Abrasions, and Punctures	Yes	Sharpen chainsaw	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Thermal Burns	Yes	Touch hot muffler or machine parts	*Heat resistant, synthetic or leather work gloves*
Cold Weather / Freezing	Possible	Work in freezing conditions	*(Insulated Option) Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Dermatitis – caused by poisonous plants (ivy; sumac)	Possible	Allergic reaction	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Blood-Borne Pathogens (BBP)	Possible	Splashed by BBP liquids.	*Nitrile gloves (in First Aid Kit)*
Other hazard:_____			

Work Clothing Protection Assessment - In some cases workers must shield most or all of their bodies against hazards at work, such as exposure to moving traffic in Work Zones and fall from heights. Exposures to corrosive chemicals and blood-borne pathogens may occasionally exist. Materials used in whole-body personal protective equipment include rubber, leather, synthetics, and plastic.

Is there potential for bodily injury from:	*Yes/ No Possible*	*Describe the Hazard (example)*	*Work Clothing Protection*
Struck by traffic when on the ground	Yes	Traffic don't see employee.	*Class III Vest or Class III Apparel*
Falls - from bucket	Yes	Ejection from bucket	*Full body harness and lanyard (approved personal fall protection). **Always 100 % tied-in required.***
Falls - from tree working aloft	Yes	Fall from tree	*Climbing saddle, safety strap, climbing rope. **Always 100 % tied-in required.***
Handling heavy, sharp or rough materials	Yes	Pushing branches or limbs over.	*Durable work shirt & pants.*
Dermatitis – caused by poisonous plants (ivy; sumac)	Possible	Allergic reaction	*Long pants; shirt with Long sleeves.*
UV Sun Exposure	Possible	Sun burn	*Long pants; shirt with Long sleeves.*
Other hazard:_____			

Note: *Follow all Equipment Manufacturer's recommended PPE to be worn.*

Herbicide Sprayer - PPE Hazard Assessment Certification

SAF-0008-F005

Job Title Assessed: Herbicide Sprayer	**Hazard Assessment Team** Name / Title: Tracy Hawks *Training Manager* Name / Title: Joe Kern *Sr. Training Specialist* Name / Title: Mark Foster *Sr. EHS Specialist* Name / Title: Neil Volwieder *Sr. EHS Specialist*	
Certification of Hazard Assessment	Certifier Name: Neil Volwieder. CSP	**Date of Hazard Assessment:** 10/30/18

Eye & Face, Hearing Protection Assessment

Personal protective equipment such as special hard hats, safety glasses with side protection can protect workers from the hazards chemical splashes, and particles, dirt, mists, and dust.

Is there potential for eye, face, ear injury from:	*Yes/No Possible*	*Describe the Hazard*	*Eye, Face, Ear Protection*
Impact - flying particles (basic impact: wood dust, dirt, sand, etc.)	Yes	Particle(s) hit eye	*Safety glasses with side protection (ANSI Z87.1+)(+ signifies impact rated for the potential impact hazard))*
Impact - fixed object	Yes	Hits or pokes eye	
Chemical Splash – Herbicide Mists	Yes	Transfer or apply chemical; gets in eye	*Safety glasses with side protection (ANSI Z87.1) wraparound design, foam lined; or safety goggles. (D3 rating per ANSI Z87 standards for potential splash hazard) Face Shield as per SDS/MFR requirements*
Blood-Borne Pathogens (BBP)	Unlikely	Body fluids splash eyes	*Safety Goggles or Safety glasses with side protection (ANSI Z87.1)*
Optical Light - Glare	Possible	Glare blinds worker	*Tinted safety glasses with side protection (ANSI Z87.1)*
Noise – at or above 85dB time weighted average (TWA)	Yes	Exposed ≥ 85db on time weighted average (TWA)	*Ear plugs, or earmuffs (with high enough NRR rating to reduce noise below 85db)*
Other hazard:_____			

Herbicide Sprayer - PPE Hazard Assessment Certification (continues)

Head Protection Assessment Hard hats can protect the head from impacts, such as those caused by falling objects, fixed objects, or from penetration injuries.

Is there potential for head injury from:	*Yes/No Possible*	*Describe the Hazard*	*Head Protection*
Impact – Falling Objects	Possible	Limbs / objects hit head	*Hardhat Protection (Class E Rated, Type I or II).* *Helmet Type I - protects the top of the head from impact.* *Helmet Type II - protects the top end sides of the heed from impact.*
Impact - Fixed Objects	Yes	Bumping hazard on machine parts	
Low-Hanging Objects	Yes	Hit lower brush, guy wires, or limbs.	
Impact – riding a motorized ATV / UTV	Yes	Bumping head on ATV / UTV	*DOT-rated Helmet with side impact protection*
Other hazard:_____			

Foot & Leg Protection Assessment - In addition to foot guards and work shoes, leggings (e.g., appropriate material) can help prevent injuries by protecting workers from hazards such as falling or rolling objects, sharp vegetation, wet and slippery surfaces, and hot surfaces.

Is there potential for foot injury from:	*Yes/No Possible*	*Describe the Hazard*	*Foot Protection*
Impact – Falling or Flying Particles	Yes	Wood piece or Limb falls on leg or foot	*Leather work boot specifications.* • *above the ankle,* • *full lace up* • *aggressive tread,* • *well-defined heel* *Safety Toe boots are recommended* Rubber boots for wet and or muddy conditions or snow/cold insulation needs, are permitted, should have Steel Shank when possible.
Impact - Fixed Objects	Yes	Stumble into stationary object	
Sprain - Rolling objects	Yes	Walk over debris	
Punctures - Objects piercing the sole	Yes	Walk or land on sharp or metal object	
Slips & Trips - Wet or muddy conditions	Yes	Slip on wet terrain	
Chemical Splash	Possible	Mixing or apply herbicide to foot	*Rubber chemical resistant, coated work boot (same boot specifications as above).*
Cuts & Laceration to lower leg, knees	Possible	Cut by hand tools (example - machete)	*Over-the-knee and shin protective guards.*
Other hazard:_____			

Herbicide Sprayer - PPE Hazard Assessment Certification (continues)

Hand Protection Assessment

Hand protection benefit workers exposed to severe cuts or lacerations, severe abrasions, thermal burns, and harmful temperature extremes. There may be occasional exposure to hazardous chemicals and rare exposure to blood-borne pathogens.

Is there potential for hand injury from:	*Yes/No Possible*	*Describe the Hazard (example)*	*Hand Protection*
Cuts, Lacerations, Abrasions, and Punctures	Yes	Cut with machete	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Thermal Burns	Yes	Touch hot parts (on vehicle)	*Heat resistant, synthetic or leather work gloves*
Cold Weather / Freezing	Possible	Work in freezing conditions	*Insulated option - Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Chemicals – Absorption of Hazardous Substance.	Yes	Applying herbicide	*Glove PPE rating per FIFRA Label instructions.*
Dermatitis – caused by poisonous plants (ivy; sumac)	Possible	Allergic reaction	*Cut resistant (**rated A4** or higher) synthetic or **rated A4** leather work gloves*
Blood-Borne Pathogens (BBP)	Possible	Splashed by BBP liquids	*Nitrile gloves (in First Aid Kit)*
Other hazard:_____			

Work Clothing Protection Assessment

In some cases, workers must shield most or all of their bodies against hazards at work, such as exposure to moving traffic in Temporary Traffic Work Zones and fall from heights. Exposures to corrosive chemicals and blood-borne pathogens may occasionally exist. Materials used in whole-body personal protective equipment include rubber, leather, synthetics, and plastic.

Is there potential for bodily injury from:	*Yes/No Possible*	*Describe the Hazard (example)*	*Work Clothing Protection*
Struck by traffic on the ground	Yes	Traffic don't see employee	*Class III Vest or Class III Apparel*
Chemicals – corrosive or hazardous	Yes	Applying herbicide	*PPE and clothing per **FIFRA** herbicide label instructions*
Dermatitis – caused by poisonous plants (ivy; sumac)	Yes	Allergic reaction	*Long pants, shirt with Long sleeves*
UV Sun Exposure	Possible	Sun burn	*Long pants, shirt with Long sleeves*
Handling heavy, sharp, or rough materials	Yes	Scratch leg with objects handled.	*Durable work pants*
Other hazard:_____			

Note: *Follow all Equipment Manufacturer's recommended PPE to be worn*

Glove Matrix

Usage	Style	Manufacturer	Protection	Description	Image
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing	CR998MF	GLOBAL	ANSI Cut 4/Hi-Viz	Samurai Glove High-Visibility Nitrile Dipped Gloves, ANSI A4 Knit	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing	STAGHVPN	SUPERIOR	ANSI Cut 4/Hi-Viz	Hi-Viz Composite Knit Glove made with Micropore Nitrile Grip, ANSI A5	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing	CR317INT	GLOBAL	ANSI Cut 4-Winter Lined	Samurai, Insulated Water Repellent, Foam Latex Palm Coating, ANSI Cut A5	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing	04-311	ARMOR GUYS	ANSI Cut 4-Winter Lined	Extraflex, Black MicroFoam Palm Coating, Poly-Acrylic Fleece Lining, ANSI Cut A4 Knit	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing	CR3200	GLOBAL	ANSI Cut 4	Cow grain leather drivers style glove, with Aralene® cut resistance inner shell, ANSI A4 cut resistance, ARC flash	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing	09-LC418	PIP	ANSI Cut 4	Premium Grade Top Grain Goatskin Leather Drivers Glove with Aramid Blended Lining and	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing	MU3624K	MCR	ANSI Cut 4 - Winter Lined	Mustang Utility Driver, Grain Goat, Double Palm, Kevlar Lined and Sewn,	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing Safety Department recommended	9178NFO	MCR	ANSI Cut 4/Hi-Viz	Cut Pro, 13 Gauge, HIVIZ Orange, HIVIZ Orange Nitrile Foam Palm, ANSI Cut A4	
Chain Saw Operation and Maintenance, Hand Saw Usage, Brush Removal, Chipping, and Climbing.	36136HP	MCR	ANSI Cut 4/Impact back of Hand	Grain Goatskin Leather Drivers, TPR back of the hand, Keystone, Thumb, Hypermax line, ANSI Cut A5	
Chain Saw Operation and Maintenance, Brush Removal, Chipping, and Climbing.	SG8800KEV	GLOBAL	ANSI Cut 4	Gripster Sport + Cuff, Mechanics Glove, Hi Viz, ANSI Cut A4	

Chain Saw Operation and Maintenance, Hand Saw Usage, and Climbing	378GOBKL	SUPERIOR	ANSI Cut 4	Arc Flash Goat-Grain Drivers Glove With Waterstop™/Oilbloc ™, Fully Kevlar Lined, ANSI A4, Arc Flash 4 (41 cal)	
Chain Saw Operation and Maintenance, Hand Saw Usage, and Climbing	378GOBTKL	SUPERIOR	ANSI Cut 4 - Winter Lined	Kevlar®-Lined Waterstop™/Oilbloc ™ Winter Goat-Grain Drivers Glove/	
Chain Saw Operation and Maintenance, Hand Saw Usage, and Climbing	TTP230KG	TILSATEC	ANSI Cut 4/Impact back of Hand	Gloves, CR+ Knuckleguard, premium natural goatskin leather, 13	
Chain Saw Operation and Maintenance, Hand Saw Usage, and Climbing	378GKGVBE	SUPERIOR	ANSI Cut 4 - Anti Vibration	Cut-Resistant Goatskin Anti-Impact Driver Gloves, Endura, ANSI A4, Padded Palm	
Chain Saw Operation and Maintenance, Hand Saw Usage, and Climbing	MXGKGHV	SUPERIOR	ANSI Cut 4	Hi-Viz Mechanics Glove with Goat-Grain Palms, ANSI A5	
Chain Saw Operation and Maintenance, Hand Saw Usage, and Climbing	MXGKGHVTL	SUPERIOR	ANSI Cut 4/Hi Viz/Winter Lined	Hi-Viz Winter Mechanics Glove with Goat-Grain Palms, ANSI A5	
Chemical Spray	50-N110G	PIP		Unsupported Nitrile, Unlined with Raised Diamond Grip - 11 Mil	
Chemical Spray	SM10	STAUFFER		Gloves, green Nitrile, 13" length, 11 mil, unsupported, raised diamond grip, flat cuff	
Chemical Spray	50-N140B	PIP		Unsupported Nitrile, Unlined with Raised Diamond Grip - 15 Mil	
Chemical Spray	SM15	STAUFFER		Gloves, green Nitrile, 13" length, 15 mil, unsupported, raised diamond grip, flat cuff	
Chemical Spray	5319	MCR		Nitrile gloves , 13" length, flock lined, 15 mil, straight cuff, diamond grip	

Note: The previous Glove Matrix is not a complete list and is subject to change and will be reflected by gloves made available to purchase through Supply Chain. Please contact Supply Chain for current availability as needed.

Asplundh Tree Expert, LLC.

Empty Waste Container Management

I. Introduction:

The Resource Conservation and Recovery Act (RCRA) specifically defines "empty" and how to empty containers that have held hazardous waste or acutely hazardous waste. Hazardous wastes are disposed of material that have either a characteristic of hazardous waste (ignitable, corrosive, reactive, or toxic) and/or are listed on the F, K, or U lists of hazardous waste in 40 CFR 261. An acutely hazardous waste is listed on the P list in 40 CFR 261. The emptying procedures differ for hazardous waste and acutely hazardous waste.

II. Purpose:

The purpose of this procedure is to cover all management practices concerning empty waste containers. This procedure will cover the requirements for proper handling and disposal of containers that are defined by regulations as empty containers regardless of size and material of construction. This procedure will also cover who is responsible for each of the management steps for empty containers.

III. Definitions:

Acutely Hazardous Waste – Commercial chemical products listed on the P-list in 40 CFR 261 that are discarded.

Clean Container – Any empty container that has been triple rinsed. See Policy ENV-0018 (Container Cleaning Policy).

Container – Any portable device designed to store, transport, treat, dispose of, or otherwise handle materials or chemicals.

F-list (non-specific source wastes) - This list identifies wastes from common manufacturing and industrial processes, such as solvents that have been used in cleaning or degreasing operations. Because the processes producing these wastes can occur in different sectors of industry, the F-listed wastes are known as wastes from non-specific sources. Wastes included on the F-list can be found in the regulations at 40 CFR 261.31.

Hazardous Waste – Waste that is classified as RCRA Hazardous by either listing in the F, K, or U lists or by exhibiting one or more hazardous characteristics (ignitability, corrosivity, reactivity, or toxicity) in 40 CFR 261.

Inner Liner – A continuous layer of material placed inside a container, which protects the construction materials of the container from the contained waste.

K-list (source-specific wastes) - This list includes certain wastes from specific industries, such as petroleum refining or pesticide manufacturing. Certain sludges and wastewaters from treatment and production processes in these industries are examples of source-specific wastes. Wastes included on the K-list can be found in the regulations at 40 CFR 261.32.

P-list and U-list (discarded commercial chemical products). These lists include specific commercial chemical products in an unused form. Some pesticides and some pharmaceutical products become hazardous waste when discarded. Wastes included on the P- and U-lists can be found in the regulations at 40 CFR 261.33.

Solid Waste and/or Waste – Any discarded material, including empty drums and/or containers, or container residue not otherwise used. Solid waste is a regulatory term, which includes wastes that are in any of the following physical states; solid, liquid, semi-solid, sludge, and some contained gases.

IV. Responsibility & Authority:

Safety Operations Group –Copies of the written program may be obtained from the company portal. The group is responsible for:

- Communicating regulatory requirements to Executive Management and corporate requirements to Regional Management.
- Initial development, administration of this document and support for the periodic review of safety goals.
- Monitoring regional safety goals relative to the company's operation and services.

Executive Management – Responsible for:

- Supporting the safety process, including training and work analysis, and ensuring that the necessary resources are made available.

Regional Management – Responsible for:

- Focusing on proactive activities that support the reduction of pollution potential.
- Developing procedures for waste container management within their areas of operation.
- Focusing on proactive activities that support the reduction of pollution potential.
- Implementing all facets of this policy in their respective areas.

Employees and Contractors – Responsible for:

- Abiding by all regional policies and procedures.

V. Procedure:

Determine if Container is Empty:

Employees will use the following rules to determine if a container is empty:

Hazardous Waste:

- The contents of the container have been removed using commonly employed practices for the type of container, such as pouring, pumping, and aspirating.
- There are no pourable liquids remaining in the container.
- No more than 1 inch of residue remains on the bottom of the container or inner liner.

Compressed Gas Cylinders:

- Containers that hold compressed gases are considered empty after it has been opened to the atmosphere and the pressure in the container approaches atmospheric.

Acutely Hazardous Waste:

- The container or liner has been triple rinsed using a solvent capable of removing the commercial chemical product OR
- The inner liner, that was used to prevent contact of the commercial chemical product with the container, has been removed. ***Note:*** *The removed inner liner is considered an acutely hazardous waste and must be disposed of according to RCRA regulations.*

Storage of Empty Containers:

Employees will use the following guidelines for storage of empty containers:

- Empty containers must be closed properly.
  - If the container is a bung type, the bung must always be included and closed tightly.
  - If the container is an open-top, the ring must be secured with a bolt.
- Empty container must have an "EMPTY" label affixed to the top of the drum.
- Empty drums are stored in a designated area and stored on their sides with the tops facing out.

Disposal of Empty Containers:

- The Regional/Operational Manager schedules the pickup of empty drums by an approved recycler or allows them to enter our scrap process.

VI. Quality Control:

N/A

VII. References:

40 CFR 261.7

VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Reviewed By
0	All	New Document	01/01/16	C. Genell

IX. Attachments:

N/A

X. Approval Signatures:

Approver's Name	Position Title	e-Signature
Bruce Mellott	VP, Corporate Safety	

Asplundh Tree Expert, LLC.

General Waste Management Policy

I. Introduction:

Waste management at all company facilities and project locations will be done in accordance with State and Federal environmental regulations. All waste management practices will be consistent with the company's commitment to the protection of human health and the environment. The amount of waste generated must be estimated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined. The company also encourages segregation of waste materials to ensure opportunities for reuse or recycling.

II. Purpose:

The purpose of this document is to cover all aspects of waste management; accumulation, storage, processing, transportation, and disposal for waste material generated at company facilities (owned and leased) and long-term project locations. This document will outline step-by-step the guidelines for hazardous and non-hazardous waste management. Waste materials should be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.

III. Definitions:

Acutely Hazardous Waste – Commercial chemical products listed on the P-list in 40 CFR 261 that are discarded.

Hazardous Waste Codes – Codes that are EPA established indicating the hazard of a given waste. Codes can be based on the physical or chemical properties of a waste, such as ignitability or corrosivity. Also, Codes are assigned to a specific waste, for example listed hazardous waste.

Profile Number – A number that is assigned to a waste stream once the TSDF has approved the waste to be disposed of at their facility.

RCRA – Resource Conservation and Recovery Act.

TSDF – Treatment, Storage, and Disposal Facility.

IV. Responsibility & Authority:

Safety Operations Group –Copies of the written program may be obtained from the company portal. The group is responsible for:

- Communicating regulatory requirements to Executive Management and corporate requirements to Regional Management.

- Initial development, administration of this document and support for the periodic review of safety goals.
- Auditing corporate safety goals relative to the region's operation and services.

Executive Management – Responsible for:

- Supporting the safety process, including training and work analysis, and ensuring that the necessary resources are made available.

Regional Management – Responsible for:

- Focusing on proactive activities that support the reduction of pollution potential.
- Developing a procedures for specific waste streams within their area of operations.
- Focusing on proactive activities that support the reduction of pollution potential.
- Implementing all facets of this policy in their respective areas.

Employees and Contractors – Responsible for:

- Abiding by all regional policies and procedures.

V. Procedure:

1. Personnel shall notify their Operational Manager **immediately** when a waste is generated.

2. The waste must be stored in a container that is in good condition and compatible with the waste material. All wastes are stored in new drums, unless approved by the Regional Manager. The following guidelines will be used to insure that the waste is in the proper container.

    a. If the waste is a solid or liquid that does not contain acid or caustic use a 55-gallon metal open-top drum.

    b. If the waste is a solid from a spill cleanup use a 55-gallon metal open-top drum.

    c. If the waste is a liquid and contains acid(s) or base(s) store the material in a 55-gallon plastic closed-top drum.

    d. If the waste is a solid and is construction material such as wooden pallets, cardboard, etc., store in an open-top roll-off box.

    e. If the waste is a solid and is generated in large quantities (above 50 pounds) store the material in an open-top roll-off box.

3. Local suppliers shall be contacted for the proper drum type.

4. Local suppliers shall be contacted for the proper sized roll-off container(s) for expected quantities of material. This is to be done **PRIOR** to generation of waste so that the container can be staged in the proper location.

5. Label each container with a Waste Handling Label. All containers **must** be labeled.

    a. Use a permanent marker.
    b. Write the name of the waste on the label.
    c. Write in the comments section "pending profile approval" if it is a new waste material.

Non-hazardous Waste Management

1. Mark the waste as "Non-Hazardous on the affixed Waste Handling Label.

2. Write the waste name (contents) on the label.

3. Write the profile number in the Comments section of the Waste Handling Label and on the top of the drum, if applicable.

4. Make sure the container is in good condition and there is no evidence of deterioration or leaks. If there is, transfer the waste into another compatible container.

5. Make sure the container is securely closed.

6. Contact the local supplier when the drummed waste needs to be picked up.

7. Contact the local supplier when a roll-off of non-hazardous waste is full and needs to be picked up.

Hazardous Waste Management

1. Mark "Hazardous" on the Waste Handling Label.

2. Write the name of the waste on the label.

3. Mark the appropriate hazardous characteristic on the affixed Waste Handling Label.

4. Write the assigned profile number and the hazardous waste codes in the Comments section of the Waste Handling Label and the profile number on the top of the drum.

5. Place the Waste Handling Label on the container.

6. Use a permanent marker and write the date the container was filled and the person's name that filled the container on the Hazardous Waste Generator Label and affix to the container. Also write the fill date on top of the drum.

7. Make sure the container is in good condition and there is no evidence of deterioration. If there is, transfer the waste into another compatible container.

8. Make sure the container is securely closed.

9. Regional Managers are to contact their local supplier when the drummed waste needs to be picked up.

Satellite Accumulation of Waste

A waste may be accumulated at a location at or near the point of generation that is under the control of a Region. Only 55-gallons of a hazardous waste or 1 quart of an Acutely Hazardous Waste can be accumulated at a satellite area.

If it is determined that the waste material is going to be generated on a frequent basis, a satellite area must be established for the waste material.

1. A specific location will be assigned for the satellite area.

2. A sign must be created for the satellite area and placed so that it is easily seen.

    a. Non-Hazardous Satellite Accumulation Area.
    b. The Name of the waste material.

3. The containers in the satellite area must be:

    a. In good condition.
    b. Compatible with the waste material.
    c. Have no evidence of leaks or deterioration.
    d. Labeled with the appropriate waste classification (Hazardous or Non-Hazardous).
    e. Labeled with the waste name.
    f. Labeled with the approved Profile Number.
    g. Closed at all times unless filling.

4. When 55-gallons of the hazardous waste or 1 quart of the acutely hazardous waste has been accumulated.

    a. Write the date on the container on the Hazardous Waste Generator Label.

    b. Have the drum/container picked up for disposal.

Training:

As noted above, Regional Management is responsible for developing procedures for handling specific waste streams within their area of operations. A critical part of those procedures is addressing specifically how employees will be made aware of the proper methods used to handle, store, and dispose of various waste streams. Specifically, all employees will be instructed on the proper disposal method for wastes. This may include general instruction on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees will be trained to ensure proper disposal.

VI. Quality Control:

N/A

VII. References:

N/A

VIII. Revision Table:

Revision Number	Section Changed	Change(s) Made	Date	Reviewed By
0	All	New Document	01/01/16	C. Genell

IX. Attachments:

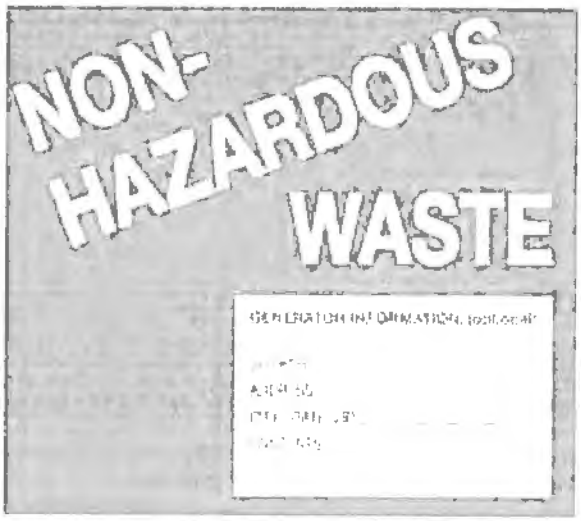
ENV-0001-F001 (Waste Handling Labels)

X. Approval Signatures:

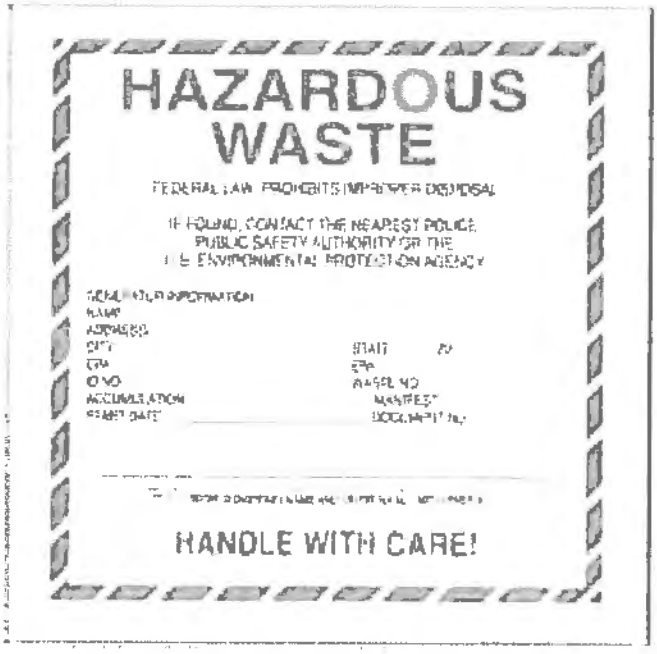
Approver's Name	Position Title	Signature
Bruce Mellott	VP, Corporate Safety	

Waste Handling Labels

ENV-0001-F001



NON-HAZARDOUS WASTE



ISA Certified Arborist License

NAME	LICENSE #
Jeff Holder	KY-0404T
Gilbert King	SO-4342A
Jimmie Brown	KY-0661A

ASPLUNDH®

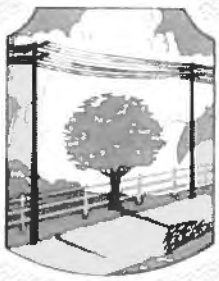
CUSTOMER STORM EMERGENCY PROCEDURES

When a crippling storm hits your area, Asplundh emergency crews are as near as your phone or computer. Our storm coordinator anticipates your needs by charting storms and quickly alerting Asplundh personnel in areas likely to require assistance.

To help us help you weather the storm, please follow the procedures outlined here.

STORM EMERGENCY HOTLINE

1-866-635-3422



Corporate Headquarters: 708 Blair Mill Road ▪ Willow Grove, PA 19090
Fax: 215-784-1444 ▪ www.asplundh.com ▪ storm@asplundh.com

SAFETY FIRST ...

NO ONE GETS HURT!

ASPLUNDH STORM EMERGENCY PROCEDURE
Tree Crews

During a storm emergency, the unmatched resources, organization, and experience of Asplundh have maximum value to you. We recognize your need to maintain reliable service and are dedicated to helping you achieve it.

The purpose of this Storm Emergency Procedure is to assist you in restoring service as rapidly as possible. We also want to ensure efficient crew operations, better reporting, accurate billing, and customer satisfaction. At Asplundh's Willow Grove Headquarters, we chart and monitor every emergency situation from the first notice of any threat. Our regional managers will already be alerted and will be securing the release of crews from unaffected areas.

WHEN IT APPEARS LIKELY YOU WILL NEED ADDITIONAL ASSISTANCE, call your Asplundh Region Manager or designated alternate. This person will then contact the Asplundh Storm Coordinator, who will secure the requested assistance.

If you cannot reach the local Asplundh office, please call:

Storm Coordinator:	**Office**	**Mobile**
Gregg Asplundh	215-784-4212	215-499-7686
Assistant Storm Coordinator		
Greg Staton	215-784-4337	215-266-6371
Alternates:		
Jared Mason	215-784-4326	267-443-7848
Pete Pellicone	215-784-4466	215-510-1831
Jim Fiant	215-784-4279	215-495-9070
Mike Sage	215-784-1391	215-206-8982
Joe Moran	215-784-4469	610-504-9614/215-779-8587
Mark Bologna	215-784-4340	267-521-9386
Pete Kwasnjuk	215-784-4439	215-499-4698
John Baker	215-784-4454	215-219-4509
Brad Ellis	215-784-4488	215-421-0380

YOU SHOULD TELL US:

1. Number of crews and personnel requested, type of crews (aerial lift and/or manual), and whether chippers are required.

2. Where and to whom the responding crews report.

3. If you require Storm Damage Assessment Personnel.

4. Other types of assistance required, such as:

   a. Survey, planning, patrol & inspection services
   b. Additional supervision
   c. Roving mechanics
   d. Equipment for lease
   e. Logistical support (Large Tents, Catering, etc.)
   f. Specialized equipment
   g. Brush cleanup and removal
   h. Line construction crews (Underground, Overhead and Street Lighting)

When Asplundh crews are moved from one utility property to another, certain pre-planned policies and procedures are followed, including:

1. We set up a Local Asplundh Storm Center, including our local Region Manager and other support personnel required for maximum operating effectiveness.

2. All responding crews use specialized storm timesheets and expense reports. Rosters will be provided, designating the employees and equipment assigned to your system.

3. One General Foreperson will be assigned for every 5 responding crews.
   One Supervisor will be assigned for every 25 responding crews.
   One Safety Supervisor will be assigned for every 50 responding crews.
   Corporate Administrative support personnel may be assigned and will be billable at the local GF rates.

4. Reimbursement for utility supplied items (including fuel, safety equipment, repairs, etc.) will be made if proper documentation is provided to ATE. Documentation must include date, time, location, vehicle identification, amount and authorizing ATE representative.

PLEASE NOTE:
When you relocate Asplundh crews from one operating utility to another within your company, please notify the Local Asplundh Storm Center. Before you release Asplundh crews, please inform our Local Asplundh Storm Center.

SAFETY FIRST ...

ASPLUNDH STORM EMERGENCY PROCEDURE

NO ONE GETS HURT!

Tree Crews

I. The following equipment policies apply when crews operate outside their home areas:

a. Because standard hourly billing rates do not cover long distance travel, these mileage charges apply to and from your area:

Lift	**$ 1.98/mile**	**Split Dump**	**$ 1.61/mile**
Car / Pick-up	**$ .97/mile**	**Chipper**	**No charge (when towed by billed vehicle)**

b. After arrival, equipment billing is at the standard hourly billing rates for your property. The billable hours for equipment are based on the number of crew-hours paid.

c. Equipment left behind is billed for a maximum of 5 days per week at the following daily standby rate:

Chipper	**$ 18.00**	**Lift**	**$ 60.00**
Split Dump	**$ 35.00**	**Car / Pick-up**	**$ 35.00**

d. Chain saws are billed at the standard Asplundh rates for your property.

e. The costs of emergency supplies, security resources, bulk fuel, specialized (cranes) or rental equipment and transitional housing (small tents, sleeping bags, etc.) will be charged at cost plus 10 percent.

II. The following policies apply to labor and expenses when crews operate outside of their home area:

a. Crew composition is exactly as used on responding utility. (We cannot leave people behind, unable to earn their regular livelihood for the duration of the storm restoration work.)

b. Billing (and our payment to the crew members) is at the Requesting Storm Utility or the Responding Utility rate and conditions, whichever is higher.

c. Emergency supervision, roving mechanics, and Local Asplundh Storm Center personnel are billed at the standard Asplundh rates for your property.
   - Supervisors and General Forepersons are billed at the standard Asplundh Rates for your property.
   - Safety and Administrative personnel are billed at the standard Asplundh rate for General Forepersons for your property.
   - If there is not a standard rate for your property for the positions noted above, a rate will be submitted upon assignment of the personnel.

d. Actual cost for lodging, tolls, travel permits and other reasonable incidentals, are billed at cost plus 10 percent.

e. If cell phones are supplied, they will be billed at a rate of $3.00 per hour. Satellite phones, if required, will be billed at cost plus 10 percent.

f. The workday for the crews is based on the time that the crews leave the lodging accommodations to the time they return. If no accommodations are available and the crews are required to sleep in their vehicles, this time will be billable and paid to the employees.

g. In the event of a standby day or rest day, labor will be billable at a minimum of 10 hours.

h. The standard work day will be billed at 8 hours of straight time and hours greater than 8, at overtime (time and one half). When an employee exceeds 40 cumulative hours in a week (including hours worked on other properties) all additional hours will be billed at overtime.

i. Holidays and Sundays will be billed and paid to the employees at double time.

Note: If the employees responding to the storm are covered under a collective bargaining agreement and/or the home utility's contract specifies more stringent terms than what is noted herein, than the terms of these home agreements will supersede this document.

III. Other areas:

a. Compliance with applicable regulations – Asplundh will comply with all applicable regulations including DOT rules on trip permits and hours of service. The costs and hours necessary to comply with the law will be billed according to the rules noted.

b. When accommodations and meals are not provided, Asplundh will bill for hotels at cost plus 10 percent, and will bill for meals at the following rates:

Breakfast	**$10.00**
Lunch	**$12.50**
Dinner	**$15.00**

Note: When accommodations are at a "Resort"-type hotel, meals will be billable at cost plus 10 percent.

c. Payment terms:
In storm responses in which the customer requires approvals prior to final invoicing, an estimated invoice will be produced with payment terms of net 7 days via ACH or Fed Wire. Cash payments made for these invoices will be held as "unapplied cash" pending application to the final invoices for service. Any differences between the final billing and the estimated billing will be settled within 7 days.

SAFETY FIRST ...

NO ONE GETS HURT!

ASPLUNDH STORM EMERGENCY PROCEDURE
Tree Crews

Terms and Conditions Approved and Accepted by:

_____ Asplundh Tree Expert, LLC
Signature Name & Title

_____ _____
Signature Name & Title Customer Name

Dated _____

** The rates set forth in the agreement shall be effective for one (1) year from date signed.