UNGER
CONSTRUCTION CO.

Proof of Training

Print name: _____Signature: _____ Date: _____

Construction Waste Management

Purpose

The purpose of this program is to ensure employees and subcontractors handle construction waste streams appropriately.

Scope

This policy will apply to all work performed by employees and subcontractors including, but not limited to the following activities: construction, installation, demolition, remodeling, relocation, refurbishment, testing, and servicing or maintenance of equipment or machines and at other times general waste stream management is required.

Note: Unger Construction excludes by contract handling hazardous waste and hazardous materials such as asbestos, and lead. These services shall be contracted directly to the client. The client is responsible for signing any and all shipping documents and waste manifests. Universal Waste is a form of hazardous waste that could be generated during the course of the project. Unger Construction and our subcontractors will be responsible for collecting, packaging and labeling Universal Waste. The client will be responsible for disposal.

Responsibilities

Management (Board of Directors and Project Managers)

Management is responsible for ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this program are readily available where and when they are required. Additionally, management will monitor the effectiveness of the program, provide technical assistance as needed, and review the program bi-annually.

Program Manager

Dave Simpson is responsible for the development, documentation, training and administration of the program. This position carries the responsibility of insuring this program is adhered to and that proper reporting is executed.

Supervisors (Superintendents and Foreman)

Supervisors are responsible for determining the general waste streams, setting up the necessary collection sites and ensuring workers and subcontractors all following the procedures defined in this program. Supervisors are responsible for ensuring that a task specific job hazard analysis (JHA), also known as a safe work plan, is developed. The JHA will select, implement and document the appropriate

site-specific control measures as defined within this policy. Supervisors will direct the work in a manner that ensures the risk to workers is minimized, adequately controlled and that practices defined by this policy will be followed. Supervisors are responsible for ensuring Unger Construction employees and subcontractors are following expectations. Supervisors will be held accountable for enforcing the requirements of this program. Undesirable behavior will not resolve itself, therefore supervisors must be directly involved with modifying behaviors inconsistent with program expectations. Supervisors will be held accountable for enforcing Unger Construction's disciplinary program.

Workers (Employees and Subcontractors)

It is the responsibility of the worker to know the various waste streams at their jobsite and to follow the protocol established by this policy. Unger Construction has high expectations and requires safety excellence for each employee, crew, project and for our entire company. Workers are required to follow the minimum procedures outlined in this program. Workers are responsible for knowing the hazards and the control measures established in the JHA. Workers are responsible for using the assigned PPE in an effective and safe manner. Workers are responsible for stopping unsafe acts and correcting unsafe conditions on the spot as soon as they are discovered. Any deviations from this program must be immediately brought to the attention of your supervisor. Workers that choose to conduct themselves in a manner that is inconsistent with these expectations will be held accountable for those decisions and may incur disciplinary actions.

Training

During their jobsite orientation workers will be informed of the waste streams that apply to the project and the proper methods to store and dispose of waste. Each worker must demonstrate an understanding of the required training, and the ability to use the waste streams properly.

Proof of training is available on the "S" drive. The training data base can be sorted by employee name or by subject. This ensures supervisors and employees are able to confirm they have the necessary training and if they don't which employees do. Employees that need training should contact their project manager or superintendent to make arrangements for them to be trained.

Retraining

The need for retraining will be indicated when: A worker's work habits or knowledge indicate a lack of necessary understanding, motivation or skills, new or different waste streams, Changes in the types of waste streams to be used make previous training obsolete or Upon a supervisor request.

Hazardous Material Survey

Unger Construction requires hazardous materials surveys before demolition or renovation work begins. The survey shall include all of the following: A visual inspection of a facility or a portion thereof for suspect materials, sampling and laboratory analysis of any suspect materials found for the presence of asbestos. The hazardous materials survey will also furnish a written report that includes: a description of the area(s) visually inspected, a detailed description of any suspect material sampled, the results of any laboratory analysis of suspect materials, the method of analysis, and the total amount of asbestos containing material. Typically a floor or roof plan is included with the report to reference the written information visually.

The person conducting the survey must be certified pursuant to OSHA and/or EPA regulations. The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey needs to be kept in a project file so that it can be accessed when working on future projects.

If lead or asbestos have been confirmed to be present employees and subcontractors must follow Unger Constructions Lead and/or Asbestos program. If hazards such as asbestos or lead will be disturbed during remediation, a properly licensed professional must perform the work and follow appropriate regulations.

Job Hazard Assessment (Safe Work Plan)

Unger Construction utilizes JHA's as our means of hazard assessment and establishing a safe work plan. JHA's are performed by supervisors and/or workers. Our library of hazard assessments is maintained on the "S" drive. Before beginning a new task refer to the JHA library, generally speaking all scopes of our work are covered. For situations that have not yet been covered select one that is substantially similar and use it as a baseline. JHA's on the "S" drive are organized by work area and job description. JHA's include strategies for elimination, substitution, engineering and administrative controls. After applying all appropriate reduction and elimination technique, the remaining hazards will be analyzed and the proper PPE to reduce the hazards will be selected. PPE will be identified for hazards that are in the process of being reduced or eliminated and/or when hazard-reduction efforts are not 100% effective in eliminating the hazards.

For complex or moderate to high hazard tasks, tasks where an additional level of safety planning is needed, the safety director will perform the JHA with the supervisor and workers.

Determining Waste Streams

Before mobilizing to the jobsite each subcontractor's construction waste stream shall be evaluated. Waste streams will be separated into the following categories: scrap materials that can be used on other projects, recycling such as metal, paper, plastics, mulch for wood products, rock/cement, solid waste, chemical waste and universal waste.

Universal waste includes the following materials which are regulated by Cal EPA; Ballasts, Batteries, Computer Monitors, Florescent Light bulbs, Equipment containing mercury. Universal waste must be properly labeled and packaged.

Scheduling Waste Stream Services to Match Project Needs

Routine schedules for cleaning staging and removal of construction waste shall be built into the master schedule with flexibility based on manpower loading and scopes of work.

Safety Concerns with Waste Streams

Protruding nails, staples and other devices that could cause a laceration or puncture injury shall be withdrawn, bent over or covered in a means to prevent injury. Special practices are to be followed to dispose of oily rags, paint cans or any container that may have contained flammable liquids.

Housekeeping

Work areas are to be kept free of excessive debris, waste materials and shall be maintained in a clean and orderly condition throughout the work day. Waste or scrap materials are to be removed and deposited into proper containers by those that generated the waste or scrap. Additionally, these materials will be stacked neatly and in such a way to ensure stability.

Each subcontractor is responsible for cleanup and removal of their debris, excess material, trash, and tools on a daily basis. All access/egress routes shall be kept clean at all times. Failure to perform this function will result in the subcontractor being charged for cleanup being performed by others. Typically the cleanup charges for work performed by others will be 1.5 times the standard labor rate, in essence time and a half the normal labor rate.

Rags and Cloths

Rags and cloths soaked with flammable liquids present a serious fire risk when improperly discarded. Oil soaked rags can start a fire due to spontaneous combustion. Used rags shall be disposed of in a specially designed NFPA 30 and/or FM container. These units have lid that open no more than 60° and stays closed when not in use isolating contents from fire sources and limiting oxygen, virtually eliminating the risk of spontaneous combustion.

Chemical / Waste Storage:

All chemicals and equipment containing chemicals must be stored in approved containers and in approved areas. Chemicals brought on site by subcontractors, suppliers, visitors, vendors must be removed from the project at the completion of work.

Chemicals must be in approved containers. Flammable chemicals must be stored in a flammable cabinet. Incompatible chemicals must not be stored together. All chemicals must be properly labeled, at all times. Chemical/gas cylinder (welding, purging, leak detection cylinders) must be secured using the chest and knees protocol.

All dedicated chemical storage areas used by subcontractors, suppliers, and vendors must have safety data sheets (SDSs) readily accessible from the storage location.

Chemicals stored outside must be protected from weather and located / protected so that a leak will not cause a release to the environment.

Chemical waste shall be disposed of by following the instructions in the SDS.

Subcontractors are solely responsible for their hazardous waste streams. Paints, adhesives, solvents etc. shall not be left on site after project completion.