



SAFETY PROGRAM

OCTOBER 2018

SAFETY AND QUALITY STATEMENT

Safety and quality are always first. They always will be. And, even in our proposals, safety and quality must come first. One Energy is in business to make a profit, but we will never do that at the expense of the safety of our employees, our customers, or the community. We will not cut corners to improve profit. We will not hide our mistakes in safety or quality. We will acknowledge them, we will fix them, and we will learn from them.

Safety and quality must start at the top. The General Manager is, and always will be, in charge of safety and quality. Likewise, every team member is responsible for the safety and quality of their work. We enable our team members to be safe and produce a quality product through a comprehensive training program and open communication. We hold ourselves accountable for our failures.

If we fail to integrate safety and quality into everything we do, we will fail as an organization.

Safety is not what we put in writing. Safety is not what we are able to hide. True safety comes from our culture and the individuals on our team.

Above all else, One Energy will not compromise on safety or quality.

Jereme Kent
General Manager

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MISSION STATEMENT

To be a company that demands and enables our team members to deliver industry-leading safety, quality, and customer satisfaction in the performance of our projects.

AUTHORITY

This document has been adopted and approved by a consensus of the Board Members of One Energy LLC. This document may only be amended by a consensus of the Board of One Energy LLC. The General Manager may make changes and amendments to these documents that are in accordance with the mission statement for a period of 30 days before formally amending this document.

GENERAL APPROACH

This document is not meant to be an all-inclusive itemization of rules and regulations that One Energy's employees, partners, and subcontractors shall follow. This document is meant to detail general principles and specific items where One Energy's safety program exceeds applicable safety standards. This document is organized to match the format of 29 CFR 1926 (OSHA Construction). Specific items in our safety program that differ from OSHA minimums are contained in the appropriate subsection.

CULTURE

All of the safety rules, training, and paperwork mean nothing without having the correct safety culture. No One Energy team member should hesitate to question the safety of anything we do. Every team member must take safety personally and consider themselves responsible for their safety and their teammates' safety at all times. Knowingly ignoring safety, whether it is yours or your teammates', will not be tolerated and shall be considered grounds for immediate termination.

Under no circumstance will a team member be disciplined for asking a question about the safety of a situation or method. In the event that a team member is concerned about the safety of a specific situation, regardless of the answer that their immediate supervisor gave them, they may call the General Manager without ANY fear of retribution.

One Energy General Manager: Jereme Kent (877) 298-5853 / (419) 905-5274

OSHA COMPLIANCE

This document shall be considered a supplement to 29 CFR 1926 and not a substitute. Additionally, if a more stringent state or local standard exists, then the more stringent rule shall govern. 29 CFR 1926 shall be considered incorporated by reference in its entirety for this document.

It is to be noted that in some circumstances, One Energy may or may not be legally subject to OSHA standards. One Energy shall, at all times, operate as though it is subject to OSHA and the balance of this document.

NATIONAL CONSENSUS STANDARDS

Throughout this document, several *National Consensus Standards* are included or referenced. It is the belief of One Energy that in many cases, the additional rules, regulations, and standards contained in these documents will provide for a safer workplace. The most current version of the referenced document shall be considered part of this document. Workers who are not familiar with the specific referenced documents shall be provided training on those standards as they relate to their work.

The *National Consensus Standards* are considered a part of this manual and should be read in conjunction with this document.

SUBCONTRACTORS

All subcontractors shall comply, at a minimum, with these standards including all inclusions and references. Subcontractors are, and shall be considered, team members. We succeed together and we fail together. In order to be industry leaders in safety, we must hold all of our team members to the highest of standards. Additionally, One Energy must not be so arrogant as to think we have the best safety program available. We will learn from our subcontractors' safety culture and programs. In the event that there is a conflict with a subcontractor's safety program and One Energy's, the more stringent shall govern.

1926 SUBPART A - GENERAL

1. All One Energy team members shall cooperate and comply with properly identified OSHA inspectors and shall allow them reasonable access to all One Energy sites without requiring any warrants.
2. OSHA inspectors shall comply with all applicable safety regulations in this document and shall be required to review and acknowledge the JSA that covers the area(s) they are visiting.
3. Corporate office shall be informed in a timely manner that an OSHA inspector has approached or been on a project site.
4. One Energy sites shall always have at least one supervisor who has completed OSHA 30 hour, OSHA 510, or OSHA 500 training, during any time when work is being performed.
5. This supervisor shall be provided with this document in its entirety, and any referenced standards with which the supervisor is not familiar.
6. Posting of the OSHA 300 log shall take place at the corporate office only, unless directed differently by a company officer.
7. Any team member may, at any time, request and be provided with, a copy of the current OSHA 300 log in a timely manner.
8. All safety accidents or near misses shall be documented and reported to the relevant corporate officer as soon as the situation safely permits.

1926 SUBPART B - GENERAL INTERPRETATIONS

This section is included without modification.

1926 SUBPART C - GENERAL SAFETY AND HEALTH PROVISIONS

1. No construction, repair, or maintenance work shall be started at any project site until a Job Safety Analysis (JSA) is completed, discussed, and signed by all individuals who will be affected by the tasks being performed.
 - a. The standard form JSA (Appendix A) shall be used or subcontractor equivalent.
 - b. JSAs shall be kept and submitted regularly to the corporate office where they will be reviewed and filed.
 - c. JSAs shall be specific to the site, the task(s), and the day.
 - d. In the event there is a change from the tasks or hazards covered on the JSA, the JSA shall be modified accordingly, and the crew informed of the change.
2. Sites shall be kept reasonably free of trash and shall be regularly cleaned. Site cleaning shall be integrated into work practices to ensure an orderly workplace.
3. In addition to Subpart E, Personal Protective and Life Saving Equipment:
 - a. Safety glasses and hard hats shall always be worn.
 - b. While working over an exposed fall hazard, all hard hats shall have chin straps.

- c. Any time equipment, including pickup trucks, are at the site and are currently running all team members shall wear high visibility shirts or vests.
 - d. All workers in a wind turbine shall have a light source regardless of other circumstances.
4. Stretch and Bend
 - a. Prior to any work being performed at a site, all team members shall participate, as a group, in a reasonable stretch and bend program. After any prolonged break, the stretch and bend shall be repeated.
5. Smoking is strictly prohibited within the turbine tower, nacelle, and hub. Violation of this rule is grounds for immediate termination.

1926 SUBPART D - OCCUPATIONAL HEALTH AND ENVIRONMENTAL CONTROLS

1. All worksites shall have ready access to first aid equipment and treatment.
 - a. A First Aid kit shall be readily available at all work sites.
 - b. A trauma kit shall be available at all sites where turbine erection and system operation is being performed.
2. An individual who is certified in both First Aid and CPR by a nationally recognized agency shall be available at all sites where work is being performed.
3. Potable water shall be provided at all One Energy sites.
 - a. On days with a peak temperature above 90 degrees Fahrenheit, a commercially available electrolyte replenishment drink such as Gatorade™ or Poweraid™ shall be provided.
4. Any employee who will be working with or around a substance that presents an inhalation, absorption, or ingestion hazard shall be made aware of the associated hazards and proper procedures by a qualified supervisor.
 - a. One Energy shall provide necessary PPE (Personal Protective Equipment).
 - b. The chemical, task, and precautions shall be identified on the JSA.
 - c. One Energy shall make every reasonable effort to use chemicals and substances that do not present a health hazard.
5. Material Safety Data Sheets (MSDSs) shall be freely available at the project site for all chemicals on that site.
6. One Energy team members shall not be exposed to National Fire Protection Agency (NFPA) Health Hazard 3 or 4 substances or chemicals without permission from a corporate officer.
7. One Energy employees shall not be knowingly exposed to radiation, lead, asbestos, or any chemicals listed under 1926.64 Appendix A.
8. All chemicals and substances shall be stored and disposed using good industry practice.

1926 SUBPART E - PERSONAL PROTECTIVE AND LIFE SAVING EQUIPMENT

1. One Energy shall provide the following Personal Protective Equipment (PPE)
 - a. Hardhat
 - b. Safety Glasses
 - c. Vest (when required)
 - d. Gloves
 - e. Hearing Protection
 - f. Specialty Safety Equipment
2. With the site supervisor's permission, a team member may use their own PPE, provided it meets or exceeds the applicable safety standards.
3. One Energy Team members are responsible for providing and wearing the following:
 - a. Acceptable long pants
 - b. A shirt with sleeves (4-inch minimum)

- c. Safety Protective Boots, either steel or composite toe
 - d. Clothes necessary to deal with the effects of the weather
4. No work shall be done in areas around water where there is the potential for a team member to fall into the water unless the following conditions are met:
 - a. A corporate officer has approved the project and task.
 - b. An individual who has been properly equipped and trained to perform a rescue is present at the site.
 - c. All employees are required to wear a U.S. Coast Guard approved personal flotation device.
5. Lasers that exceed the OSHA-published maximum energy intensity for small construction lasers shall not be used.

1926 SUBPART F - FIRE PROTECTION AND PREVENTION

This section is included without modification.

1926 SUBPART G - SIGNS, SIGNALS, AND BARRICADES

This section is included without modification.

1926 SUBPART H - MATERIALS HANDLING, STORAGE, USE, AND DISPOSAL

1. The following standards shall govern material handling operations that involve rigging of any sort, unless an OSHA standard is more stringent:
 - a. ASME B30.9 Slings
 - b. ASME B30.10 Hooks
 - c. ASME B30.20 Below the Hook Lifting Devices
 - d. ASME B30.26 Rigging Hardware
2. For all material handling tasks that involve the rigging of more than 500 pounds of force (including lifting and pulling), a rigger certified by an accredited agency shall be present and responsible.
 - a. The towing of trucks is not subject to this statement.
 - b. The following agencies are currently acceptable:
 - i. NCCCO
 - ii. NCCER
 - iii. American Petroleum Industry
 - iv. Advanced Rigging from CICB
3. Rigging shall be purchased from approved vendors only.
4. All rigging shall have an attached identification tag, indicating load rating.
5. Only rated rigging may be used for lifting operations.
6. All tag lines with possible loads above 500 lbs or longer than 100 feet shall be considered rigging.
 - a. All "rigging tag lines" shall be NFPA G rated or higher and only load rated devices shall be used in the load path.
 - b. Any friction or control devices shall be load rated and shall have a "life safety" rating from the NFPA or equivalent approved standard.

1926 SUBPART I - TOOLS - HAND AND POWER

This section is included without modification.

1926 SUBPART J - WELDING AND CUTTING

1. No hot work shall take place inside any enclosed space without having a dedicated firewatch who shall remain at the site for 30 minutes after the hot work is completed.

1926 SUBPART K - ELECTRICAL

This section is included without modification.

1926 SUBPART L - SCAFFOLDS

1. No scaffolds shall be used without written approval from a corporate officer.
 - a. This approval shall only be granted when it can be shown that a scaffold is the safest way to do the work.
 - b. This approval shall only be granted when an individual who is competent in the use of the particular scaffold system will be present on site.
 - c. At all times, while on a scaffold of any size, all team members shall utilize 100% tie off when exposed to a potential fall of 6 feet or more.

1926 SUBPART M - FALL PROTECTION

1. One Energy team members, because of the type of work we perform, are exposed to fall hazards on a regular basis. It is important that all team members are generally familiar with safe practices for work at height. All team members who will work at height must be enabled through training, proper work methods, engineering controls, and proper equipment to work as safely as possible at height.
2. Incorporated National Consensus Standards
 - a. ASME Z359 (all sections) Fall Protection Standard
 - b. Cordage Institute International Standards shall establish the safe working rules for all life safety rope for standards not covered by NFPA.
 - i. CI 1201-06 Fiber Ropes, General Standard
 - ii. CI 1202-03 Terminology for Fiber Rope
 - iii. CI 1803-03 Kernmantle Accessory Cords
 - iv. CI 2001-04 Fiber Rope Inspection and Retirement Criteria
 - v. CI 2005-03 Inspection of Kernmantle Rope
3. Appointments
 - a. Fall Protection Program Administrator: Jereme Kent
 - b. Competent Rescue Trainer: Jereme Kent
4. All team members shall be protected from a fall when they are exposed to a potential fall of more than 6 feet.
 - a. A potential fall is defined as a change in elevation of more than 6 feet from the individual's working level to the lowest surface where they could potentially land in the event of a fall.
 - i. A slope of greater than 60 degrees above the horizontal shall count as a vertical wall when determining potential fall height.
 - b. All systems will be inspected prior to each use by a competent individual and additionally throughout the work as required to ensure the system is operating as intended.
 - c. All Fall Hazards and their means of protection shall be recognized on the JSA prior to work beginning.

- d. No individual may work with a harness of any kind without having been trained in the use, inspection, and methods related to the equipment used in that method of Fall Protection.
- e. The protection method will be one of the following in order of preference:
 - i. Fall Prevention
 1. The use of this method removes the potential of a fall altogether.
 2. Examples of this method include guardrails, hole covers, temporary barricades, and other methods that eliminate the potential of the fall.
 3. All guardrail systems shall meet the specifications outlined in 7 CFR 1926.
 - ii. Fall Restraint
 1. This method prevents individuals who are exposed to a potential fall from physically being able to put themselves in a position to fall.
 2. All fall restraint systems shall be required to meet the strength specifications of Fall Arrest systems.
 - a. All connectors and attachment points shall have a minimum strength of 5000 lbs per individual attached to that connector.
 3. A full body harness must be worn with all fall restraint systems.
 4. All cable grab systems that are used as part of a fall restraint system shall meet the following specifications:
 - a. They must be attached to a chest D ring on a full body harness.
 - b. They must limit the total fall exposure to no more the 18 inches total in any configuration used.
 - c. They must be used with a system strength of 5000 pounds per person on the system at any one time.
 - d. They must be on 8.0 to 9.5 mm aircraft grade wire rope.
 - e. All wire rope end connections must be installed with the most current Crosby recommendations as found in the Crosby manual.
 - f. Wire rope used in fall restraint systems must have no other use.
 - g. All wire rope systems installed by One Energy will be 9 mm wire rope.
 5. Rope Grab Systems
 - a. The only rope grab system allowed by One Energy is the Petzl ASAP.
 - i. This system must be attached to the dorsal D ring and shall be treated as a fall arrest system.
 - ii. This system must be installed using NFPA G rated static rope that is in accordance with the most current Petzl guidance.
 6. Work Positioning systems shall not be considered Fall Restraint.
 - a. An individual who is using a work position system shall also be required to have in place a Fall Arrest system.
 - b. All work positioning systems shall have minimum system strength of 5000 pounds.
 - c. Individuals who climb lattice towers shall be required to climb with at least one Work Positioning System and a harness with side D Rings.

iii. Fall Arrest

1. This method must be used when neither Fall Prevention nor Fall Restraint can be used to control fall exposure.
2. This method is a way of controlling the forces placed on the body once a fall has occurred to safely stop the individual.
3. All forces on the body shall be limited to 1800 pounds.
4. The Fall Arrest system must be designed to have minimum system strength of 5000 pounds per person on the system.
5. All Fall Arrest systems must be attached to the dorsal D Ring of the individual.
6. All team members who will be climbing a tower, regardless of type, shall climb with two shock absorbing lanyards, or a "Y" lanyard (preferred).
7. Only Fall Arrest harnesses approved by a company officer shall be used. This includes personal harnesses provided by team members.
8. One Energy shall provide harnesses for team members. Team members may use own harnesses provided the above approval is given.
9. Regardless of fall exposure, all individuals who are climbing a tower of any type shall keep their harness on at all times unless doing so would present a greater risk.
 - a. The "greater risk" exemption may only apply when there is ZERO potential for a fall exposure.
 - i. An example is when working inside an enclosed nacelle and around the rotating drive shaft where the potential for the harness or lanyards to become caught presents a greater risk.
10. The Fall Arrest system must be designed so that the individual can maintain 100% tie off, meaning that at no point are they exposed to an unarrested fall.

f. Tower Rescue

- i. No individual may climb more than 20 feet on any lattice tower without a rescue system in place and a trained individual, other than the worker, present at the immediate work site.
- ii. For heights above 50 feet, a rope tower rescue system shall be in place on site and readily available.
- iii. The Rope Tower Rescue System shall:
 1. Meet the requirements of a rescue system under American Nation Standards Institute (ANSI) Z359.4.
 2. Consist of the Petzl ID Large as the primary descent control device. Alternate systems may be used only with corporate approval.
 3. Be packed only by an authorized individual as defined by ANSI Z359.4.
 4. Be inspected and documented at least monthly.
- iv. The Rescuer shall:
 1. Have completed a Tower Rescue Course that meets the requirements of one of the following standards:
 - a. National Association of Tower Erectors
 - b. ANSI Z359.4 for Authorized Rescuer
 - c. NFPA Rope Rescue Technician Level 1 or Higher

- d. Society of Professional Rope Access Technicians (SPRAT) Level 1 or higher
 2. Regardless of the initial training, be trained specifically for the Petzl ID and the specific way in which it is packed for their job tasks.
 3. Regularly (every 6 months) receive refresher training on the system.
 - v. Post Rescue
 1. All individuals who are rescued after a fall from height where they hung suspended for any period of time shall be treated for orthostatic shock.
 - a. They shall be transported to the hospital by advanced life support qualified paramedics only.
 - b. They shall be screened for kidney function.
5. Rope Access
 - a. It is not the intention of One Energy to engage in rope access work.
 - b. In the event that rope access is the only reasonable means to accomplish the work, then only individuals who have received rope access training by a nationally accredited agency may perform the work.
6. Crane Assembly Exception
 - a. A specific fall protection plan shall be in place for crane assembly operations.

1926 SUBPART N - HELICOPTERS, HOISTS, ELEVATORS, AND CONVEYORS

This section is included without modification.

1926 SUBPART O - MOTOR VEHICLES, MECHANIZED EQUIPMENT, AND MARINE OPERATIONS

This section is included without modification.

1926 SUBPART P - EXCAVATIONS

1. No shoring or trench boxes of any kind shall be used.
2. No multi-angle sloping systems shall be used as a protection system.
3. The balance of this Subpart is adopted without modification.

1926 SUBPART Q - CONCRETE AND MASONRY CONSTRUCTION

This section is included without modification.

1926 SUBPART R - STEEL ERECTION

The provisions of Subpart R that differ from Subpart M with respect to fall protection are not adopted. Otherwise, the balance of Subpart R is adopted without modification.

1926 SUBPART S - UNDERGROUND CONSTRUCTION, CAISSONS, COFFERDAMS, AND COMPRESSED AIR

This section is included without modification.

1926 SUBPART T - DEMOLITION

This section is included without modification.

1926 SUBPART U - BLASTING AND THE USE OF EXPLOSIVES

This section is included without modification.

1926 SUBPART V - POWER TRANSMISSION AND DISTRIBUTION

This section is included without modification.

1926 SUBPART W - ROLLOVER PROTECTIVE STRUCTURES; OVERHEAD PROTECTION

This section is included without modification.

1926 SUBPART X - LADDERS

This section is included without modification.

1926 SUBPART Y - COMMERCIAL DIVING OPERATIONS

No commercial diving operations shall be performed by One Energy or its team members.

1926 SUBPART Z - TOXIC AND HAZARDOUS SUBSTANCES

This section is included without modification.

1926 SUBPART CC - CRANES AND DERRICKS IN CONSTRUCTION

1. All cranes that are erected on site and will be used for critical picks require that an inspector not involved in the crane erection do a complete inspection on the crane after it is assembled.
2. Cranes may be partially disassembled and reassembled on site provided the following are met:
 - a. If more than a boom and counterweight disassembly is required, then an independent inspector is required after reassembly.
 - b. A qualified erector must be present for any modifications, or full or partial breakdowns.
3. A crane-erection-specific JSA must be done prior to any erection activities.
4. A hard copy of the crane assembly manual must be present at the site prior to any assembly/disassembly activity taking place.
5. "Walking the Boom" will only be permitted below 10 feet and when no other option is feasible or safer. If this is to be done, it must be addressed on the JSA.
6. Incorporated Standards
 - a. ASME B30.5 Mobile Cranes
7. All crane operators for mobile cranes as defined by ASME B30.5 above 3 tons shall be certified by a nationally accredited crane operator program;
8. A pre-pick meeting shall be held prior to ALL critical picks.
9. Critical Pick Policy
 - a. All picks above 30,000 lbs, 50% of crane gross capacity, or valued at more than US\$50,000 shall be considered critical picks. Critical picks shall be planned in writing with the appropriate level of detail per the following schedule:
 - i. Level 1 Critical Pick
 1. Any of the following: 30,000 lbs, 50% gross capacity, valued at US\$50,000 or greater
 2. Written pick plan that includes crane capacity, detailed weight calculation, percentage of capacity, max wind speed, max radius, and other data necessary to ensure a safe crane pick
 3. Approval: Certified Crane Operator, Certified Rigger, foreman in charge (may be rigger)
 - ii. Level 2 Critical Pick
 1. Any of the following: 75,000 lbs, 75% gross capacity, valued at US\$100,000 or greater, or tandem picks
 2. Written pick plan that includes crane capacity, detailed weight calculation, percentage of capacity, max wind speed, max radius, max height, and other data necessary to ensure a safe crane pick
 3. Written ground loading, bearing pressure, matting plan

4. Written boom and load geometry plan
5. Written rigging and tagline plan
6. Written pre-pick checklist
7. Approval: Contractor-qualified pick planner, One Energy-qualified pick planner review, certified crane operator, certified rigger, foreman in charge (may be rigger)
- iii. Level 3 Critical Pick
 1. Any of the following: 150,000 lbs, 90% gross capacity, valued at US\$500,000 or greater
 2. Written pick plan that includes crane capacity, detailed weight calculation, percentage of capacity, max wind speed, max radius, max height, and other data necessary to ensure a safe crane pick
 3. Written ground loading, bearing pressure, matting plan
 4. Written boom and load geometry plan
 5. Written wind loading evaluation
 6. Written certification of load weight, or plan to determine weight
 7. Written hazard/failure mode analysis
 8. Written rigging and tagline plan
 9. Written pre-pick checklist
 10. Approval: Contractor-qualified pick planner (must demonstrate experience on similar picks, PE alone is not acceptable), One Energy General Manager, certified crane operator, certified rigger, foreman in charge (may be rigger)
- iv. Notes
 1. One copy of the pick plan materials shall be kept in the crane cab.
 2. One copy of the pick plan materials shall be maintained by One Energy.
 3. One copy of the pick plan materials shall be maintained by contractor.
 4. The pre-pick plan checklist, when required, shall be completed in writing by the crane operator prior to the pick beginning.
10. Methods shown in the latest edition of the reference text, *Cranes and Derricks* by Shapiro and Shapiro, shall be used to calculate the wind and ground loading of all picks above 50,000 lbs.
 - a. All calculations shall be attached to the pick plan.
 - b. All calculations shall be made by a certified rigger with professional education or training in engineering calculations of this type.
11. Crawler crane walks shall be planned and executed only by those approved by the General Manager. All such walks shall include a written plan, geotechnical engineer review, bearing pressure analysis, and proof roll.
12. Tandem Picks
 - a. All tandem crane picks, including tailing operations, shall require a pick plan for both cranes, and a summary sheet that shows the geometry used in each crane's pick plan.
 - b. During a tandem pick, no crane shall make a pick above 75% of its rated capacity.
 - c. The certified rigger responsible for the tandem pick shall have experience and engineering abilities necessary to calculate the loading of each crane throughout the lifting process.
 - d. During a tandem pick, no crane's load line shall be allowed to become more than 10 degrees off vertical.
13. Man Baskets

- a. No man basket picks shall be made without the review and approval of the General Manager.
 - b. All man basket picks shall be subject to the restrictions in 1926 Subpart M.
14. Wind speed shall be based on the crane, the load, and the task. Maximum speeds must be identified on the JSA and the pick plan. The highest gust at tip height shall be the speed.

APPENDIX A

JSA TEMPLATE

APPENDIX B

CRITICAL PICK PLAN EXAMPLE

APPENDIX C

**SITE SPECIFIC EMERGENCY
PLAN EXAMPLE**

APPENDIX D

TRAINING MATRIX

APPENDIX E

COMMISSIONING ENERGY CONTROL AND ISOLATION

APPENDIX F

HEAT SAFETY POLICY