



AIRCORPS AVIATION

*Injury & Illness
Prevention Program*

AIRCORPS AVIATION
BEMIDJI, MINNESOTA

Responsible Safety Officer:

BEN REMER, SAFETY MANAGER
ERIK HOKUF, MANAGING PARTNER



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INTRODUCTION

In 1990, the State of Minnesota amended the Occupational Safety and Health Act. Minnesota Statutes Chapter 182.653 subd.8 requires employers in certain industries to develop written, comprehensive workplace safety and health programs which are based on the NAICS (North American Industry Classification System) system. This legislation is known as A Workplace Accident and Injury Reduction (AWAIR) Act. Programs developed to comply with the act are known as AWAIR programs. The requirements of the legislation that are addressed and complied within our program are as follows:

1. How managers, supervisors and employees are responsible for implementing the program and how continued participation of management will be established, measured and maintained;
2. The methods used to identify, analyze and control new or existing hazards, conditions and operations;
3. How the plan will be communicated to all affected employees so they are informed of work-related hazards and controls;
4. How workplace accidents will be investigated and corrective action implemented; and
5. How safe work practices and rules will be enforced

With this program, you will be informed of the contents of the Minnesota OSHA Employee Right-to-Know standard, the hazardous properties of the chemicals you work with, safe handling procedures and measures to take to protect yourselves from these chemicals. You will also be informed of the hazards associated with non-routine tasks and the hazards associated with chemicals in unlabeled pipes.

MNOSHA has adopted a list of NAICS codes that we have determined to exist within our jurisdiction as a public entity. These departments are under our blanket AWAIR program.

SAFETY POLICY STATEMENT

The management of AIRCORPS AVIATION is aware that our employees are our most valuable resource. Our safety policy leaves no doubt as to our commitment to providing a safe, injury and illness free workplace. The success of our safety program requires clearly defined goals, specific objectives and the identity of those that will share the responsibility of accomplishing those goals and objectives.

Our AWAIR Program provides an “umbrella” under which all other safety policies and procedures will be administered.

REVISION OF PROGRAM

The Safety Manager annually reviews this program and may make necessary revisions. The Approving Authority shall retain the responsibility for all policy revisions.

APPLICATION

This AWAIR program is intended to serve as an overview of all currently applicable Safety and Health programs. This program outlines the philosophy by which AIRCORPS AVIATION will develop, implement and maintain all other safety and health programs which concern more specific topics.



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While compliance with the law and OSHA standards is an important objective, an effective AWAIR program must be tailored to AIRCORPS AVIATION'S particular needs. This program shall look beyond specific legal requirements to identify and analyze existing hazards. It shall seek to prevent injuries and illnesses, even when compliance is not an issue. Ultimately, the program's effectiveness in practice is what is important.

Should a department's operations require the need for a specific addition to this program, said specifics will be added as an addendum for that department and be maintained by that department within their operations.

GOALS AND OBJECTIVES

Central to our AWAIR program are the goals and objectives we, as an organization, have set for our overall safety and health program. The goals establish the direction for our program and state what we are attempting to achieve through this program.

Our goals are generally challenging to reach or complete, but are also possible to achieve. The goals are specific to AIRCORPS AVIATION. Our objectives are specific actions that we will be taking to attempt to achieve those goals. Our objectives can either be measured or demonstrated. To accomplish the AWAIR goals, this Facility shall establish goals related to their specific safety and health program on an annual basis.

THE GOALS OF THE AWAIR PROGRAM ARE TO:

- provide a safe and healthful workplace
- reduce the frequency of work-related accidents
- reduce the severity of work-related accidents
- comply with state and federal OSHA standards

SAFETY COMMITTEE/MANAGER

AIRCORPS AVIATION has established a Safety Committee and a Safety Manager.

The following responsibilities have been assigned to the Safety Manager to promote a safe and healthful working environment:

SAFETY MANAGER

- Implement the AWAIR program and safety SOPs
- Review and evaluate the effectiveness of the AWAIR Program on an annual basis and revise it as needed
- Act as a role model
- Comply with all safety rules
- Enforce safety rules
- Discuss current safety issues with staff at the beginning of all regularly scheduled staff meetings
- Address all safety concerns raised by staff members



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- Conduct or coordinate safety training
- Investigate all accidents and near misses
- Fill out appropriate incident forms
- Coordinate or conduct Facility inspections and control hazards identified

ROLES AND RESPONSIBILITIES

FOR EVERYONE IN THE ORGANIZATION:

All employees, including supervisors and managers, must follow all safety rules at all times.

FOR EMPLOYEES:

1. Employees must promptly report any safety and health hazards they observe to their supervisor or safety committee representative.
2. An employee's first priority is to perform each job task safely. If an employee is unsure how to perform the task safely, he or she must consult with their supervisor.
3. Employees must wear personal protective equipment as required for their protection and maintain the equipment in a sanitary manner.
4. Employees must report all accidents and near misses to their supervisor immediately upon occurrence.

FOR SUPERVISORS:

1. Supervisors must discuss any current safety issues with their employees at the beginning of all regularly scheduled staff safety meetings or at the daily standup meetings.
2. Supervisors will address all safety concerns raised by staff by initially investigating the issue, determining if the concern is valid and taking appropriate corrective action whenever necessary. Corrective action can include ordering new equipment, issuing maintenance work orders or consulting with the safety director, the safety committee or upper management.
3. Immediately upon learning of an accident or near miss the supervisor must initiate an investigation and submit the completed accident investigation report to the safety director.
4. Supervisors will actively and positively participate in all Safety Committee inspections of their assigned areas.

FOR SAFETY COMMITTEES:

1. The Safety Committee will conduct meetings, assist in area inspections, review accident reports, identify hazards, and address any and all safety concerns raised by employees, first-line supervision or the safety director.
2. The Safety Committee representatives will review their respective AWAIR program at least annually and make recommendations concerning updates and revisions to the program to senior management.
3. Safety Committee members each represent their particular work area and, therefore, should address all safety concerns brought to them by their coworkers. These concerns should be handled by initially investigating the issue with the area supervisor to determine if the concern is valid and then, as necessary and appropriate, bring the issue to the safety director or the full safety committee.

FOR MANAGEMENT/ ADMINISTRATION:

1. Managers will communicate to all employees and supervisors the importance of worker safety and health throughout the organization.
2. Management shall review all safety concerns brought forward by the Safety Manager, the Safety Committee or first-line supervision and take appropriate action.
3. Management shall review the AWAIR program and any recommended revisions from the Safety Committee at least annually, make the appropriate revisions and work with the Safety Manager, the Safety Committee and first line supervision to communicate the revisions throughout the organization.
4. Management also establishes the importance of the AWAIR program, both by the priority they give workplace safety and health issues and by the example they set by initiating safety and health improvements, correcting hazards, enforcing safety rules, rewarding excellent performance in safety and health, and by following all safety rules. Safety and health programs are similar to quality improvement and other efforts organizations engage in to continually improve performance, customer service, competitiveness, organizational culture, etc.
5. Management will develop and communicate an annual budget for safety, to include: hazard correction, enforcement, material/supply, and promotion expenses.

ENFORCEMENT OF SAFETY AND HEALTH PROGRAMS

Enforcement of safe work practices should be fair, consistent throughout the company, and based on established policy. Management and supervision should be conscious of the examples they set for the workplace and should obey the same rules as the rest of the workforce. Unsafe or unhealthy work action by all employees shall be corrected in a timely manner based on the severity of the hazards. The enforcement of the program is based on the following methods:

1. Verbal warning
2. Written warning
3. Leave without pay
4. Termination

Disciplinary action will follow the above sequence unless the situation warrants bypassing one or more levels.

Not only should negative behavior be discouraged, but positive behavior should be reinforced as well. Exceptional performance or efforts in workplace safety and health should be recognized by the organization.



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HAZARD IDENTIFICATION, ANALYSIS AND CONTROL

AIRCORPS AVIATION will use the following steps to Identify, Analyze and Control hazards:

- ☐ Walk-around inspections by Supervisors, Management, or the Safety Committee members
- ☐ Job or safety hazard analyses of different parts of the operation
- ☐ Inspections should be done on a regular basis to identify both newly developed hazards and those previously missed
- ☐ Periodic industrial hygiene monitoring and sampling for agents such as hazardous substances, noise and heat
- ☐ Job hazard identification checklists
- ☐ Employee reporting of workplace safety and health hazards
- ☐ Employee hazard abatement suggestions SP 8 - Certification of Employee Training
- ☐ Preventative maintenance inspections
- ☐ Engineering controls
- ☐ Administrative controls
- ☐ Personal Protective Equipment
- ☐ Management and Employee Training

COMMUNICATION

All managers and supervisors are responsible for communicating with all workers about occupational safety and health in a form readily understandable by all workers. Our communication system encourages all workers to inform their managers and supervisors about workplace hazards without fear of reprisal.

Our communication system may include one or more of the following items:

- ☐ New worker orientation including a discussion of safety and health policies and procedures
- ☐ Review of our program
- ☐ Training programs
- ☐ Regularly scheduled safety meetings
- ☐ Posted or distributed safety information
- ☐ A system for workers to anonymously inform management about workplace hazards

CONTRACTOR DUTIES

All contractors shall follow any and all Minnesota OSHA, Federal OSHA, MN DOT, MPCA and other regulatory agency's rules that pertain to their worksites in the State of Minnesota. All contractors shall be responsible for initiating, maintaining and supervising safety and health related policies, programs and work practices in connection with the performance of contractual work.

DUTIES TO SUB-CONTRACTORS

Contractors that use sub-contractors shall be responsible for communicating any and all safety and health related information to those sub-contractors and shall ensure that sub-contractors initiate, maintain and supervise safety and health related policies, programs and work practices while performing sub-contracted work.

IMMINENT DANGER

In the event of an imminent danger situation, AIRCORPS AVIATION reserves the right to suspend contracted work if said work exposes the employees of either employer to imminent danger.

IMMINENT DANGER DEFINITION PER MNOSHA

Imminent danger situations are given top priority. An imminent danger is any condition or practice that presents a substantial probability that death or serious physical harm could occur immediately or before the danger can be eliminated through normal enforcement procedures. MNOSHA becomes aware of these situations through reports received from employees, the general public or direct observation by an investigator.

If an imminent danger situation is identified, the safety and health investigator will ask the employer to voluntarily eliminate the hazard and to remove the endangered employees from exposure. If the employer fails to do this, MNOSHA may "red tag" the equipment or job site for 72 hours.

ACCIDENT INVESTIGATION

Procedures for investigating workplace accidents, hazardous substance exposures, and near misses include:

1. Interviewing injured workers and witnesses;
2. Examining the workplace for factors associated with the accident/exposure;
3. Determining the most probable cause of the accident/exposure;
4. Taking corrective action to prevent the accident/exposure from re-occurring; and
5. Recording the findings and actions taken. It should not be to affix blame.

Each contributing factor should be traced back to its root cause. A written report that describes the accident and its causes and recommendations for corrective action and prevention will be prepared and presented to management. The ultimate goal of the investigation is to determine the basic and root causes and to determine appropriate corrective action so the incident does not happen again. To simply attribute an accident to "employee error," without further consideration of the basic causes, deprives the organization of the opportunity to take real preventive action. Possible use of engineering controls, improved work practices and administrative controls should be considered to help employees do their jobs safely. Management practices may also be considered as a possible basic factor. For example, if there is managerial or supervisory pressure to increase production or cut costs, employees may take unsafe shortcuts in work procedures or delay or skip necessary preventive maintenance. The Accident/Injury Investigation Form (SP 10) may be used.



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PROGRAM EVALUATION

The AWAIR Act requires employers to review the entire program at least annually and document the findings. Program review is vital because it serves as a check to see if the organization is making progress towards its goal of creating a safer, healthier workplace for all employees. The annual review keeps the program fresh, accurate and an integral part of the organization.

APPENDIX A

EMPLOYEE RIGHT-TO KNOW

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MN EMPLOYEE RIGHT-TO-KNOW PROGRAM FOR AIRCORPS AVIATION

GENERAL COMPANY POLICY

The purpose of this notice is to inform you our company is complying with the Minnesota OSHA Employee Right-to-Know standard by providing you with training about the hazardous materials, harmful physical agents and infectious agents you are exposed to on the job. As part of this effort, we have compiled a list of the hazardous chemicals used in our facility, collected safety data sheets (SDS) from our vendors for these chemicals, received reference material about the other harmful agents employees are exposed to, ensured that containers are labeled and signs are present in the hazardous areas.

This program applies to all work operations in our company where you may be exposed to hazardous substances, harmful physical agents or infectious agents under normal working conditions or during an emergency situation.

The Safety Manager (Taylor Smith) is the program coordinator and has overall responsibility for the program. The Safety Committee will review and update the program, as necessary, pending approval from the Managing Partner (Erik Hokuf). Copies of the written program may be obtained from Taylor Smith.

With this program, you will be informed of the contents of the Minnesota OSHA Employee

Right-to-Know standard, the hazardous properties of the chemicals you work with, safe handling procedures, and measures to take to protect yourselves from these chemicals. You will also be informed of the hazards associated with non-routine tasks and the hazards associated with chemicals in unlabeled containers.

TRAINING

Everyone who works with or is potentially exposed to hazardous chemicals, harmful physical agents or infectious agents will receive initial training about the Employee Right-to-Know standard and the safe use of those chemicals or agents prior to work assignment. A program has been prepared for this purpose and is outlined below. Whenever a new hazard is introduced, additional training will be provided. Training updates will be performed at least annually and may be brief summaries of information included in previous training sessions. The program coordinator is responsible for ensuring this training is provided.

TRAINING PLAN

The employee right-to-know training will include:

- a summary of the standard and this written program;
- the chemical and physical properties of hazardous materials and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes);
- the physical hazards of chemicals (e.g., potential for fire, explosion, etc.);



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- the name of the substance or agent and the level, if established, at which exposure to the hazard has been restricted according to standards adopted by the commissioner, or, if no standard has been adopted, according to guidelines established by competent professional groups;
- the health hazards, including signs and symptoms, associated with exposure to chemicals, harmful physical agents and infectious agents, and any medical condition known to be aggravated by exposure to these hazards;
- the procedures to protect against those hazards (e.g., use and maintenance of personal protective equipment; work practices or methods for proper use and handling of chemicals; and procedures for emergency response);
- the work procedures to follow to assure protection when cleaning up incidental spills and leaks of hazardous chemicals;
- the location in the facility where SDS, physical agent data sheets (PADS) and infectious agents information can be found;
- instruction about how to read and interpret the information on labels, SDS and PADS; and
- direction about how employees may obtain additional hazard information.

Records of training will be maintained for three years in and will include:

- the dates of training;
- the name, title and qualifications of the person who conducted the training;
- the names and job titles of the employees who completed the training; and
- a brief summary or outline of the information that was included in the training session.

LIST OF HAZARDOUS CHEMICALS

The Safety Manager has created the list of all hazardous substances and related work practices in the facility, and will update the list as necessary. The list of chemicals identifies all of the chemicals used in work areas. A separate list is available for each individual work area. Each list also identifies the corresponding SDS for each chemical. The master list of all chemicals used by employees includes: coolants, cutting oils, welding fumes, paints, thinners, acetone, and cleaners.

LIST OF HARMFUL PHYSICAL AGENTS

The Safety Manager has created a list of the harmful physical agents that are present in the workplace in amounts approaching regulatory limits through equipment use, product handling, etc. Heat, noise, ionizing radiation and non ionizing radiation sources have been identified for each work area. Each list also identifies the corresponding physical agent data sheet for each source. The master list of all physical agents includes: noise and weld flash.

SAFETY DATA SHEETS (SDS)

Safety data sheets provide specific information about the chemicals you use. The program coordinator will maintain an electronic database found on the server and at <http://aircorpsaviation-mn.safepersonnelsds.com/> with an SDS about every substance on the list of hazardous chemicals identified in the facility. The SDS will contain the information found on a fully completed OSHA Form 174 or its equivalent.



The program Safety Manager is responsible for acquiring and updating SDS. He or she will contact the chemical manufacturer or vendor if additional research is necessary or if an SDS has not been supplied with an initial shipment. All new materials to be brought into the facility must be cleared by the program coordinator.

HARMFUL PHYSICAL AGENTS INFORMATION

The program coordinator is responsible for acquiring a physical agent fact sheet (PADS) or comparable written information about the identified harmful physical agents employees may be exposed to in the course of assigned work. The PADS or other written information will be maintained in an electronic database found at <http://aircorpsaviation-mn.safepersonnelsds.com/>.

LABELS AND OTHER FORMS OF WARNING

The program coordinator will ensure all hazardous chemicals in the facility are properly labeled and updated as necessary. Manufacturer's container labels should be left on the containers if possible and must list, at a minimum, the chemical's identity, the appropriate hazard warning, and the name and address of the manufacturer, importer or other responsible party.

If you transfer chemicals from a manufacturer's container into another container, the new container must have a label that identifies the chemical identity and any appropriate hazard warning.

Immediate-use containers, which are containers of hazardous substances remaining under the control of one employee and that are emptied during the same work shift, need not be labeled.

The Safety Manager will ensure equipment or work areas that specifically generate harmful physical agents at a level that may be expected to approximate or exceed the permissible exposure limit or applicable action level are posted with the name of the physical agent and the appropriate hazard warning.

NON-ROUTINE TASKS

When you are required to perform hazardous non-routine tasks, a special training session will be conducted by the Safety Manager or an approved trainer to inform you regarding the hazardous chemicals you might be exposed to and the proper precautions to take to reduce or avoid exposure. SDS will be available about the hazardous chemicals used. The program coordinator is responsible for ensuring this training is provided.

FREQUENCY OF TRAINING

The Safety Manager will review our employee training program on a regular basis and will advise management regarding initial or annual refresher training needs. Retraining is also required whenever a new hazard is introduced into the workplace. As part of the assessment of the training program, the program coordinator will obtain input from employees regarding the training they have received and their suggestions for improving it. This review will be performed annually; necessary revisions will be made to ensure currency and applicability.

APPENDIX B, C, D, E.....Z:\ADMIN\SAFETY



Acknowledgment Statement

Receipt of Safety Manual

I acknowledge that I have received a copy of the Employee Safety Manual for AirCorps Aviation company employees. I agree to read it thoroughly. I agree that if there is any policy or provision in the manual that I do not understand, I will seek clarification from my Supervisor or the appropriate member of staff.

This manual states the employer's policies and practices in effect on the date of publication. To the extent that the Employee Safety Manual sets out policies, that are to be complied with by all employees, failure to do so is a violation and may result in disciplinary action up to and including termination.

I understand that the employer may revise, modify, delete or add to any and all policies, procedures and work rules in this manual or in any other document. I also understand that nothing contained in the manual may be construed as creating a promise of future benefits or a binding contract with this Company for benefits or for any other purpose.

SIGNATURE OF EMPLOYEE

DATE

PRINTED NAME