



Safety  
**Life Saving Rules (LSRs)**

<b>Policy Owner</b>	VP of Safety
<b>Policy Approver(s)</b>	VP of Safety and CEO
<b>Related Policies</b>	See SAF-POL-000
<b>Related Procedures</b>	See SAF-POL-000
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## Purpose

The purpose of this policy is to present and reinforce to the overall workforce the most common life-threatening hazards in GreenWaste’s operations and the rules that must be followed to help prevent those events from occurring. The hazards and associated rules to prevent incident are collectively called the Life Saving Rules (LSRs).

LSRs help to maintain the well-being of GreenWaste’s employees and work to help ensure everyone can return home unharmed. A top ten list of LSRs has been developed to raise awareness regarding the most common life-threatening hazards that could occur at GreenWaste. The LSRs have sub-rules which describe the specific activities and behavior expectations that must be followed. The likelihood of a serious accident can be reduced when workers all understand, abide, and hold each other accountable to these Rules. If any worker ever has a question about the Rules, they are encouraged and expected to contact their supervisor.

## Scope

LSRs apply to all levels of the GreenWaste organization. When contractors and visitors are at GreenWaste facilities or property, they should comply with LSRs in addition to their own company’s safety policies and applicable law. It is recognized there can be additional life-threatening hazards associated with GreenWaste operations not listed herein, and that work procedures and training must be followed to safely complete tasks.

## Governing Laws & Regulations

This policy is meant to work with and meet or exceed all local, state, and federal laws (including OSHA and Cal OSHA) in which the Company operates and where the employee is performing work; therefore, in any conflict with applicable law, the applicable law shall supersede this policy.

## Policy Statements



**Speak Up for Safety** You have the responsibility and right to speak up and ask questions if a situation is unsafe.

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## Life Saving Rules (LSRs)



**Isolate Energy (LOTO)** All sources of energy shall be identified and isolated before working on equipment using the LOTO process.



**Drive Defensively** Be professional, undistracted, and defensive while abiding by driving laws and GreenWaste policies.



**Mind Mobile Equipment** Unless you have provided concurrent notice and received agreement from the equipment operator that it is safe to enter, do not enter restricted areas where mobile equipment operates. Equipment operators and ground workers must continuously watch for each other in areas where they work together.



**Prevent Fires & Explosions** Work that has a possibility of starting a fire must only be done in approved areas. Use the Hot Work program to control sources of ignition and materials that can catch fire. Have a fire watch present when needed. Truck drivers are trained to respond to both fires in the load (Hot Loads) as well as the truck itself.



**Control Confined Spaces** Only enter Confined Spaces if essential to do so and follow the GreenWaste Confined Space policy.



**Guard Moving Machinery** Protect yourself from moving machinery, including with proper clothing, eyewear, machine guards, performing Lockout/Tagout, and using Emergency Shut-Off switches.



**Prevent Falling** When around a fall hazard greater than 4 feet, a proper railing system shall be in place, or other actions shall be taken to provide fall prevention and/or wear fall protection equipment (harnesses).



**Secure Lifting & Hoisting** Lifts shall be planned and performed by trained personnel, with equipment rated for the load and the lift areas secured to prevent loads from falling on personnel.



**Prevent Runaway Vehicles** Work at the right pace and follow the truck stopping and braking procedures to safely secure a vehicle before exiting the vehicle.

### 1. Speak Up for Safety

All members of the GreenWaste workforce have the authority, obligation, and responsibility to “speak-up” when work is unsafe or potentially unsafe. While efforts are made to plan for safe operation and work execution, it is recognized that work conditions may change from what was planned and it is important to speak-up if a new hazard has been created. The process of speaking-up to question work safety is often informal, immediate, and can be conducted without generating harsh feelings or feeling intimidated. Likewise, if you are involved in an incident (for example an injury, property damage, chemical spill, or a fire) or such a near miss incident almost happened, then report it to your supervisor immediately so it can be addressed to correct the situation. You can also report any incident, near miss incident or unsafe or potentially unsafe work to HR, Legal, Safety or the anonymous Red Flag Reporting hotline, 1-888-478-1050

- Safe practices should always be forefront when carrying out job functions



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- GreenWaste workers are encouraged to “Speak Up” for safety
- Every GreenWaste employee has a personal responsibility to ensure the safety of themselves and those around them
- Workers are required to immediately report unsafe conditions to a supervisor so corrective action can be taken and contractors are required to also make a report to GreenWaste
- Employees will not be reprimanded or retaliated against for speaking up
- Employees have the right and responsibility to activate the Emergency Shut-Off Devices

**SPEAK UP IF:**

- you are asked to do something you have not been trained to do
- you are uncertain how to do a task
- you are in doubt about the safety of any operations
- you believe working conditions or behaviors are considered unsafe
- you see simultaneous activities ongoing that may impact each other in an unsafe manner
- you are discouraged from speaking up or penalized for doing so; report this action immediately to HR, Legal, Safety or the anonymous hot line Red Flag Reporting hotline, 1-888-478-1050

**2. Isolate Energy (Lockout/Tagout - LOTO)**

Vehicles, mobile equipment and processing facilities all use energy to collect and process waste and recyclables. When equipment needs to be serviced (for example, inspection, maintenance or cleaning), workers must be protected by isolating this energy and performing work using a structured process called Lockout/Tagout (LOTO). LOTO protects workers from uncontrolled exposure to energy hazards including being electrocuted, crushed, pinched, and burned.

- Prior to starting work, identify and isolate potential energy sources
- Follow the LOTO permit process to isolate and discharge energy sources
- After placing LOTO controls, verify the system is de-energized and an override does not exist
- All persons working on the system shall apply their approved LOTO lock
- Personal LOTO locks and tags can only be removed by the person who installed them, or by a supervisor when approved
- Before returning equipment to normal operations, notify the worker responsible for the area that work is complete
- Supervisors shall routinely inspect LOTO effectiveness
- Energy Sources that need to be locked and tagged include:
  - Process fluids
  - Hydraulics
  - Pneumatics
  - Thermal
  - Chemical
  - Electrical
  - Mechanical Systems
  - Gravitational / Potential

**3. Drive Defensively**

All GreenWaste drivers need to practice defensive and courteous behavior both on public roads and at waste facilities. Any GreenWaste worker driving a company car or truck or driving their own vehicle on company business must represent GreenWaste in a safe and professional manner. GreenWaste collection trucks are much larger than other on-road vehicles and truck drivers must remain extra alert



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and defensive as the trucks frequently start, stop, and maneuver in congested areas with. GreenWaste can exercise good driving behavior that can reduce a potential accident's likelihood and severity.

- Never operate vehicles under the influence of alcohol or illegal or prescription drugs which may impair driving ability
- Use pre-and post-trip inspections on heavy duty and commercial to ensure proper vehicle operating condition
- All passengers must wear a seatbelt
- Use Get Out and Look (GOAL) when view is limited or poorly lit
- Leave a safe distance from other vehicles for stopping and maneuvering
- Obey posted traffic laws and speed limits
- Cautiously cross intersections
- If involved in a driving incident, if you can, immediately report the incident to your supervisor and if necessary, notify first responders
- Minimize all distractions from the driving space
- Adhere to the GreenWaste policy and state law restricting mobile device (mobile phones, tablets, laptops) use while driving
- For collection truck activities there are additional rules
  - Always wear a seatbelt off-route, and while on stop-to-stop collection route at speeds over 20 mph. (Use of a seatbelt is always encouraged, but exception is permissible under this operating condition.)
  - Dual / Right Side Driven trucks may be operated from the right side while on a stop-to-stop collection route if they:
    - wear the safety strap between stops
    - drive less than 20 mph
    - drive less than ¼ mile between stops
  - Rear End Loading trucks with a helper on the route shall travel in a safe manner.
    - Helper must only ride in the vehicle cab or on steps specifically designed for riding
    - Helper must remain inside the vehicle cab or approved step until the vehicle is completely stopped
    - Driver shall not exceed 10 mph or travel more than 0.2 miles when the helper is standing on the back of the truck
    - Driver shall not back-up when the helper is located at the back of the truck (standing on the back of or behind the truck)

#### **4. Mind Mobile Equipment**

GreenWaste facilities involve simultaneous operations of workers walking in areas where trucks load and unload debris, mobile equipment moves the debris, and customers drive their own cars. The traffic patterns and activity level at a waste or recyclables processing site is different than on public roads. Efforts must be taken by both pedestrians and drivers to remain aware of their surroundings and move and/or operate safely.

- High visibility jackets, shirts, or vests must be worn
- Pedestrian traffic crossings must be utilized
- Restricted areas may only be entered with approval
- Eyes & ears must always be on alert for equipment and vehicles
- Instructions from Yard Spotters must be followed
- Ground personnel should be kept away from loads being dumped, clearance distances are:



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- Ejection loads: personnel shall be at least 10 ft away
- Tilt-frame: personnel shall be at least 15 ft away
- End-Dump Trailer: personnel shall be at least the length of trailer plus 10 ft
- Mobile equipment shall be inspected Pre- and Post-Trip to verify equipment is fit-for-service
- Mobile equipment operators may use cell phones and radios for business purposes only and must be push-button or hands-free
- Mobile equipment may only operate with adequate lighting or headlights/spotlights
- Mobile equipment is only to be operated by trained personnel
- Mobile equipment drivers shall utilize eyes, ears, available mirrors, cameras, and sensors when backing up

### **5. Prevent Fires & Explosions (Hot Work)**

GreenWaste collects, sorts, stores, and/or sells large volumes of waste, materials and recyclables, some of which have the potential to be flammable and combustible. Collected wood, paper, and general trash can lead to very large fires, so sources of ignition must always be controlled. Job site activities that are capable of igniting combustible and/or flammable materials are called Hot Work. Hot Work includes grinding, welding, burning, and portable heaters. Hot Work is only permitted in designated areas like garages and shops, unless a written Hot Work permit is approved. Additional fire risks exist for collection trucks and mobile equipment which are powered by flammable fuels and haul collected waste materials that can catch fire. To prepare for a fire, firefighting equipment must be routinely checked for readiness and workers need to be trained to respond.

- Smoking is not permitted in vehicles or equipment or at GreenWaste sites, except in designated areas
- Be aware of lithium-ion batteries that can catch fire and can be difficult to extinguish
- Use the Hot Work permit to plan work involving sources of ignition
- Dedicate Fire Watches, consisting of qualified personnel dedicated to preventing, monitoring, and responding to fires
- Fire Watches shall remain at the worksite for 1 hour after hot work is completed
- Collection trucks with loads that catch fire (“Hot Loads”) shall be contained and extinguished according to training, supervisors informed of the incident and emergency responders immediately informed during a high wind event
- Dust accumulation shall be controlled, wetted, and managed to prevent risk of fire
- Flammable materials and liquids shall be properly stored away from ignition sources
- Firefighting equipment shall be properly stored, inspected, and maintained
- Small fires can be attempted to be fought with a portable fire extinguisher or water hose if it is in the early stage, there are no flammable explosive or hazardous materials involved, and it can be done without risk of personal injury. All fires must be reported to your supervisor.
- In the event of a larger fire onsite, workers shall:
  - stop work and activate emergency alarm or contact their supervisor (radio or phone)
  - listen for response instructions or directions
  - respond to fight the fire if trained to do so using fire extinguishers and water hoses
  - evacuate to the emergency assembly area if so instructed or in danger
  - call 911 / fire department if necessary.
- Collection and On-Road Trucks have special rules for fire prevention and response
  - Trucks shall be kept clean, meet the Pre- and Post-Trip Inspection requirements, and combustible and flammable materials must be properly stored to prevent fires
  - Small fires can be fought with a fire extinguisher if caught early and if it does not pose a risk of personal injury.



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- If a truck engine catches fire, immediately pull over to a safe place, exit the truck, call your supervisor or dispatcher, and 911 if needed.
- If the fire is in the garbage load (“Hot Load”), and the driver does not feel it is safe to drive then pull over immediately and exit the truck and contact the dispatcher/supervisor. However, if the driver feels it is safe to continue driving, then;
  - Contact your supervisor or dispatcher
  - Compact the load
  - Drive to an open remote / uninhabited area (open parking lot)
  - Dump the load and allow fire department to extinguish the fire
  - Other drivers on route should be prepared to respond and support a truck in distress
- In any truck fire situation drivers should use judgement in where to pullover and/or dump the load to minimize impact to people, the environment and property. Consider these risk factors:
  - Impacts to human lives and the general public
  - Wind direction and where smoke might blow
  - Nearby infrastructure that could catch fire
  - Starting a wildfire

## **6. Control Confined Spaces**

As part of inspection, maintenance, cleaning and general servicing of trucks and facilities, there are areas called Confined Spaces. Efforts are made to avoid entering a Confined Space by eliminating the hazards or eliminating need to enter the space by using tools to remotely perform work. However, in some situations workers need to enter a Confined Space, and an approved process must be followed to manage the hazards as outlined in the GreenWaste Confined Space policy.

- Confined Space is recognized as meeting all the following three conditions:
  1. large enough and so configured that a person can enter and perform assigned work;
  2. has limited or restricted means for entry or exit; and
  3. is not designed for continuous occupancy.
- Confined Spaces shall be assessed prior to work to determine if work can be performed without personnel entry
- Atmospherically monitor and mechanically ventilate Confined Spaces to prevent possible asphyxiation or toxic exposure
- Atmospheric testing is conducted before and during entry and as required by permit, workplan or SDS
- Take steps to eliminate any space hazards and establish non-permit required Confined Spaces
- Always hold a pre-entry safety meeting to review the job workplan, precautions, safety best practices and any concerns, hazards and SDSs or other safety sheets
- Barricade the work area to prevent unauthorized persons and vehicles from entering
- Ensure an emergency response and rescue plan is in place
- Entrants may need to wear lifelines, harnesses, and other appropriate rescue equipment
- Never enter a Confined Space without a “Confined Space Attendant” being present
- Periodically monitor the work being performed in a Confined Space
- Proper access and egress to safely enter and exit the Confined Space shall be always provided prior to and in performance of the work
- Examples of Confined Spaces at GreenWaste:
  - Trommels
  - Sewer utility access



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- Holes
- Pits
- Underground sumps
- Storage tanks
- Excavations deeper than four feet
- Hazardous substance or other enclosed storage containers with limited access

### **7. Guard Moving Machinery**

GreenWaste operations require many high speed and powerful machines that haul and process materials by sorting, shredding, and crushing waste or recyclables. Types of machinery involved include trucks, mobile equipment, garage and shop tools, conveyors and screens, discs and robotic arms, and various other sorting and crushing machines. Machine guards are meant to protect workers when they perform tasks near this equipment to prevent potential injury, including being drawn in, pinched, pulled, cut, or struck.

- Stop production instead of risking injury from moving unguarded machinery hazards
- Do not wear loose fitting clothing, jewelry, or long hair below the shoulders which could be drawn into machinery
- Tear-away safety vests shall be worn by all workers with potential exposure to moving machinery
- Machine guards shall be in place to prevent workers from encroaching on moving machinery and shall be in place prior to operating machinery
- Machine guards may not be tampered with, modified, or removed unless the equipment is Locked Out/Tagged Out
- Machine guards shall be restored prior to re-energizing any machines
- If any guards are missing, then workers shall notify their supervisor immediately
- Workers shall be prepared to activate emergency stops if a worker is at risk of being pulled into a machine
- Emergency stops shall be periodically tested for effectiveness
- Machines guards shall be regularly inspected and maintained

### **8. Prevent Falling**

Operating, inspecting, and maintaining of equipment often requires workers to be working more than 4 ft above ground or a hole which is over 4 ft deep. In situations where a worker can fall more than 4 ft, the risk of falling must be managed to prevent injury. Normal elevated work areas often have permanent ladders and stairs, platforms, and handrails that must be properly maintained. However, when these systems are not required to be in place or are in need of repair and/or undergoing maintenance, fall protection measures must be taken to prevent falling or restrict how far a worker may fall.

- Work surfaces 4 ft or higher both above ground and at the edge of excavations are recognized as fall hazard and require preventative measures
- Work surfaces over 4 ft high shall have a 42" high railing or wall, or other protection measures must be in place, such as safety harness
- Work within the confines of the platform, stairs, handrail, and ladder systems
- Notify your supervisor if platforms, stairs, handrails, or ladders are faulty
- Fall protection must be a full body harness, inspected before use, and each harness must be replaced once it has arrested a fall
- Harness and lanyards must be formally inspected monthly



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- Harnesses shall have double lanyards to always maintain 100% tie-off
- Ensure the anchor point for fall protection can withstand a 5,000 lb. load. In most cases this requires tie-off to a specially engineering anchor point for fall protection.
- Portable ladders shall be inspected before use, have adequate load rating, have visibility to the working floor, and be properly positioned
- Secure all tools and equipment to prevent falling objects from potentially hitting any workers below
- Climbing on top of truck canopies is not permitted unless fall protection is used
- Excavations greater than 4' must have barricades at the excavation edge to help prevent falling.

### **9. Secure Lifting & Hoisting**

The collected waste, recyclables and containers at GreenWaste are moved and lifted with large mobile equipment, such as cranes, loaders, and forklifts. Lifting operations can be dangerous, such as if the equipment struck someone, the load were to drop, if an overhead hazard were contacted e.g. power lines, or if the lifting equipment were to tip and fall over. Lifting operations must be carefully managed by trained and qualified personnel, and the worksite controlled so nobody is positioned in a space where a load could fall and hurt them.

- Personnel should never stand under or in the swing radius of a suspended load
- Secure the area under and around lifted loads with barricades and caution tape to restrict access
- Only trained workers may operate rigging, hoisting, and lifting devices
- The lift shall be planned by those involved to identify and mitigate potential hazards, including overhead obstructions and power lines
- Cranes and all associated rigging shall be designed and rated to safely handle the load
- Cranes shall be placed on a firm, level foundation, and outriggers used if applicable
- Trained signal operators shall be within view of the crane operator during an entire lift
- Always obey an emergency stop signal
- Never perform lifts in high winds or poor visibility/lighting, nor during lightning threats, heavy rains or other weather conditions which impact safe lift execution

### **10. Prevent Runaway Vehicles**

Collection truck drivers need to get in and out of their trucks frequently as part of their job, and in certain cases with the truck still on when in the act of waste/recyclables collection loading/unloading. It is important that the truck is secured every time a driver exits the vehicle, or else the truck may "Runaway" without the driver. To avoid runaway vehicles, drivers need to follow the required stopping and parking brake procedures. Trying to chase after and re-enter a runaway vehicle is not a safe practice.

Rules for collection trucks include:

- Work at a safe pace, do not be in a hurry
- Use the foot brake to come to a complete stop, shift to neutral, and then activate the parking brake
- Use the Work Brake (Auto Neutral Interlock Brake System) on a collection route for stop-to-stop operations
- Verify the brake is holding before leaving the vehicle
- When possible, avoid parking on a steep incline or decline
- Be aware of where a truck may rollaway if parked on an incline





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- If parked on a steep incline or decline, steer the parked truck so the front tires roll into the curb if it accidentally rolls away.
  - Uphill, turn wheels towards the street
  - Downhill, turn the wheels towards the curb to avoid rollaway
- Unless it is an emergency, do **NOT** Use the parking brake to stop the vehicle, it will severely damage the braking system
- Unless it is an emergency, do **NOT** Use the trailer brake, if equipped, as a parking brake

## Non-Compliance

The effectiveness of this policy will be ensured by tracking, recording, monitoring, coaching/training, and response and/or corrective actions taken for incidents of non-compliance.

Violations of this policy will be handled according to established GreenWaste employee handbook procedures, policies and applicable law. Sanctions for non-compliance may include, but are not limited to, one or more of the following:

- Disciplinary action according to applicable GW policies;
- Termination of employment; and/or
- Legal action according to applicable laws and contractual agreements.

All discipline is within GreenWaste's complete discretion and GreenWaste is not obligated to follow any specific type of progressive discipline process.

## Revision History

Version ID	Date of Change	Rationale
Final	11/07/22	Final Procedure