

SUBJECT: Workplace Back Safety Program.

REGULATORY STANDARD: OSHA - 29 CFR 1926.20 - .21

General

SUBTERRA UTILITIES will ensure that potential back injury risk factors at our jobsites and facilities are evaluated and controlled. This program is intended to address the issues of evaluating and identifying back injury hazards, evaluating engineering controls, work practices, administrative controls, and establishing appropriate procedures.

Responsibility

The Program Manager is the program coordinator, acting as the representative of SUBTERRA UTILITIES owners, who have the ultimate responsibility for all facets of this program. The Program Manager is the sole person authorized to amend these instructions. SUBTERRA UTILITIES has authorized the Program Manager and any Supervisor or Employee to halt any operation of SUBTERRA UTILITIES where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received training before assignment to work.

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Written Program

SUBTERRA UTILITIES will review and evaluate this program periodically, or when changes occur to the regulations, or when operational changes occur that require a revision of this workplace back safety program.

Training Requirements

- **Types of Training.** Supervisors will determine whether training required for specific jobs will be conducted in a classroom or on-the-job. The degree of training provided will be determined by the complexity of the job and the associated hazards.
 - **Initial Training.** All employees will receive awareness training that will describe the basic hazards of lifting and common lifting techniques. Prior to job assignment, SUBTERRA UTILITIES will provide training to ensure that the hazards associated with predetermined job responsibilities are understood by employees and that the knowledge and skills required for the safe application and usage of work place procedures and equipment, are acquired by employees. The training will include the following:
 - Each affected employee will receive training in the recognition of back injury hazards involved with a particular job, and the methods and means necessary for safe work.
 - **Training Course Content.** All new and current workers, who work in areas where there is reasonable likelihood of back injury, will be kept informed through continuing education programs. Initial and refresher training will, as a minimum, cover the following:
 - Back hazards associated with the job.
 - Lifting techniques.
 - Potential health effects of back injury.
 - Back injury precautions.
 - Proper use of protective clothing and equipment.
 - Use of engineering controls.
- **Responsibility.** Employees are responsible for following proper work practices and control procedures to help protect their health and provide for the safety of themselves and fellow employees, including instructions to immediately report to the Supervisor any significant back injury.

- **Refresher Training.** Scheduled refresher training will be conducted periodically.
 - Retraining will be provided for all affected employees whenever there is a change in their job assignments, a change in equipment or processes that present a new hazard, or when their work takes them into other hazard areas.
 - Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever SUBTERRA UTILITIES has reason to believe, that there are deviations from or inadequacies in the employee's knowledge of known hazards, or use of equipment or procedures.
 - The retraining will reestablish employee proficiency and introduce new equipment, new lifting procedures or revised control methods and procedures, as necessary.

Hazard Prevention and Control

- **Job Hazard Assessment.** A job hazard assessment will be performed by Supervisors at the beginning of new jobs. Supervisors will be trained to look for potential back injury risks. This analysis will help to verify risk factors and to determine if risk factors for a work position have been reduced or eliminated to the extent feasible. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried. Supervision must periodically evaluate work areas and employees' work techniques to assess the potential for and prevention of injuries. New operations should be evaluated to engineer out hazards before work processes are implemented.
- SUBTERRA UTILITIES understands that engineering solutions, where feasible, are the preferred method of control for lifting hazards. Manual lifting equipment shall be used instead of manual lifting where possible. Supervisors shall enforce the use of lifting equipment. Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists must be provided for employees. Other engineering controls such as conveyors, lift tables, and work station design shall be considered. The focus of this program is to make the job fit the person, not to make the person fit the job. This is accomplished whenever possible by redesigning the work station, work methods, or tool(s) to reduce the demands of the job, including high force, repetitive motion, and awkward postures. The Program Manager will, whenever possible, research into currently available controls and technology.

Administrative Controls

Company administrative controls will be used to reduce the duration, frequency, and severity of exposures to lifting hazards, which can cause back injury. Examples of administrative controls include the following:

- Reducing the amount of exposure per employee by such means as decreasing production demand and limiting overtime work.
- Providing rest pauses to relieve fatigued muscles. The length of time needed depends on the task.
- Increasing the number of employees assigned to a task to alleviate severe conditions, especially in lifting heavy objects.
- Using job rotation with caution and as a preventive measure. The principle of job rotation is to alleviate physical fatigue and stress of a particular set of muscles rotating employees among other jobs that use different muscles. Providing sufficient numbers of standby/relief personnel to compensate for foreseeable upset conditions on the line (e.g., loss of workers).
- **Job Enlargement.** Having employees perform broader functions which reduce the stress on specific muscle groups while performing individual tasks.

Safe Lifting Techniques

First, use a pushcart or other material-handling device if available. Ask a co-worker for help if no device is available. If you must lift alone here are some tips. Before starting to lift or carry anything, check your entire walkway to make sure your footing will be solid. Your shoes should give you good balance, support and traction. Keep loads as close to your body as possible. Where use of lifting equipment is impractical or not possible, two-man lifts must be used. The following situations show basic lifting techniques to avoid injury:

- Lifting or lowering from a high place
 - Stand on a platform instead of a ladder
 - Lift the load in smaller pieces, if possible
 - Slide the load as close to yourself as possible before lifting
 - Grip firmly and slide it down
 - Get help when you need it to avoid injury
- Lifting from hard-to-get-at places
 - Get as close to the load as possible
 - Keep back straight, stomach muscles tight
 - Push buttocks out behind you

- Bend your knees
- Use leg, stomach, and buttock muscles to lift -- not your back
- Lifting drums, barrels, and cylinders
 - Use mechanical equipment
 - Be aware that loads can shift
 - Get help if load is too heavy
- Awkward Objects
 - Bend your knees with feet spread
 - Grip the top outside and bottom inside corners
 - Use your legs to lift, keeping back straight
- Shoveling
 - Make sure your grip and balance are solid
 - Tighten your abdomen as you lift
 - Keep the shovel close to your body
 - Use the strength of your thigh muscles to bring you to an upright position
 - Increase your leverage by keeping your bottom hand low and toward the blade
- General Safety Tips
 - Don't lift objects over your head
 - Don't twist your body when lifting or setting an object down
 - Don't reach over an obstacle to lift a load
 - Pace yourself to avoid fatigue

Incident Investigation

Musculoskeletal injuries caused by improper lifting shall be investigated and documented. Incorporation of investigation findings into work procedures must be accomplished to prevent future injuries.

Safety Program Revisions & Updates

The table below shall be used to record revisions and or updates conducted to this safety program. The date, person conducting the revisions and revision notes shall be added each time for record keeping purposes.

Revisions & Updates		
Date	Name	Revision Notes
03/20/2025	Enrique Garza	Document Format Revision & General Review Completed

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