SUBCONTRACTORS SITE SAFETY COMPLIANCE PROGRAM

(MANUAL)

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SECTION ONE
PROJECT SAFETY POLICY

The subcontractor, regardless of tier, has agreed to supervise and direct the work using their best management skills and technical expertise. The subcontractor will be solely responsible for all construction means, methods, techniques, sequences and procedures. This includes all safety precautions and programs in connection with the work, as well as for coordinating all portions of the work. In addition, each subcontractor, regardless of tier, agrees to be responsible for all safety precautions and programs in connection with the work under the prime agreement.

Each subcontractor, regardless of tier, will present a written safety program to the *CONTRACTOR* for review. This safety program will meet or exceed all applicable federal, state, county and city laws, statutes, regulations, codes, ordinances, and orders of those governing bodies having jurisdiction over the work and which will meet or exceed the guidelines set forth in the *CONTRACTORS* Safety Compliance Program.

This document serves to provide certain guidelines for the sub-contractor, regardless of tier, to establish a safe and drug-free work environment. The guidelines outlined in this manual do not limit or prescribe the necessary safety or drug testing procedures the subcontractor, regardless of tier, must follow.

SECTION TWO
INTRODUCTION

The *CONTRACTOR* has developed this manual to ensure that pro-active safety processes are used on this project. We, as the *CONTRACTOR* and you, as the subcontractor, regardless of tier, on this project have as a goal, the elimination of all injuries to all employees and the down time associated with accidents. The requirements of OSHA and this manual establish the standards that your Safety Compliance Programs must meet or exceed.

In addition to setting minimum standards, this manual promotes safety by requiring on-site employee safety orientations designed to promote a safe work environment.

The information in this manual is not intended to alter the provisions of the Agreement with the *CONTRACTOR.* In the event of a conflict or inconsistency, the Agreement will govern.

A. General Information

The *CONTRACTORS* objective is to emphasize that protecting people and property are of paramount importance to the success of this project. To accomplish this objective we are utilizing a pro-active safety process.

The Pro-active Safety Process (PSP) is a practical approach to the prevention of accidents. The PSP emphasis is on discovering what causes accidents and identifying where in the work processes those causes are likely to occur. Only by breaking the cycle of accident evolution can accidents be controlled.

Accident prevention is a continuing process, not a fixed program. The *CONTRACTOR* recognizes that the subcontractor, regardless of tier, may have there own specific safety requirements. It is the responsibility of the subcontractor, regardless of tier, to identify to the *CONTRACTOR* how their program may deviate from the guidelines set forth in this manual prior to any deviation.

While it is the responsibility of each individual to work safely, it is ultimately the subcontractor's, regardless of tier, responsibility to see that all rules (safety and health) and practices are followed and enforced. Active participation by the subcontractor, regardless of tier, in construction Safety Compliance Programs is mandatory. Subcontractor, regardless of tier, must demonstrate to their employee's complete support and continuing involvement in all safety and loss prevention efforts.

Safety is not to be sacrificed for production; however, project schedules will be maintained. Safety must be considered an integral part of the planning process. The goal of the *CONTRACTOR* along with the subcontractor, regardless of tier, is to eliminate accidents. The subcontractor, regardless of tier, is charged with the responsibility for developing, adhering to, and enforcing the Safety Compliance Program.

B. Subcontractor's Safety Compliance Program

The subcontractor, regardless of tier, will establish and maintain a Safety Compliance Program that meets or exceeds the requirements contained in this manual. A written safety program must be submitted with the bid for review by the *CONTRACTOR*.

The subcontractor, regardless of tier, is solely responsible for carrying out their Safety Compliance Program. Therefore, the *CONTRACTOR* requires that the subcontractor, regardless of tier, designate a competent on-site employee to carry out this responsibility. This employee is directly responsible for ensuring that their program and employee actions comply with the minimum safety standards required by federal, state and local codes and regulations, and the safety guidelines set forth in this manual.

C. Drug Free Work Environment

This project is a drug-free work environment. The subcontractor, regardless of tier, will maintain a drug-free environment in accordance with Florida Drug Free Workplace Statutes Chapter 440. The subcontractor, regardless of tier, is responsible for testing any and all of their employees who work on the project for the presence of drugs or alcohol.

The subcontractor, regardless of tier, will test their employees, as appropriate, throughout the construction process, including testing at the time of any accident and to the extent necessary to implement drug-free work standards. The *CONTRACTOR* and/or their representatives have the right to audit the records, at any time, in order to confirm that each employee who works on the project has been drug tested. In addition, subcontractors are responsible for ensuring that all of their subcontractors, regardless of tier, drug test their employees who report to work on the project in order to maintain a drug-free work environment. The CONTRACTOR and/or their representatives have the right to conduct Random testing during the course of the project. In addition the CONTRACTOR and/or their representatives may require/conduct drug testing as part of the Orientation process.

All confidential records regarding employee drug testing will need to be maintained by the subcontractors, regardless of tier, in a manner consistent with their company policy.

SECTION THREE
RESPONSIBILITIES

A. Subcontractor

1. Expectations

The subcontractor, regardless of tier, have the explicit responsibility to perform work in accordance with federal law (including both 29CFR1910 and 29CFR1926 statutes) and the State requirements. This is in addition to compliance with their own company requirements. Additionally, subcontractors are accountable for fulfilling the responsibilities listed in this section.

If the subcontractors, regardless of tier, have 50 or more combined total employees on site, they must have a dedicated safety representative assigned to the site full time to carry out the duties described below. If the subcontractors, regardless of tier, have fewer than 50 combined total employees on site, they can delegate these duties to an on-site supervisor (who we refer to as a safety designee).

In situations where it is agreed upon that safety policies and requirements overlap, causing potential conflicts, the stricter requirement(s) will apply.

2. **On-Site Safety Representative or Designee**

The qualifications of the dedicated safety representative or safety designee must be submitted to the *CONTRACTOR* for approval prior to assignment to the site. Approval will depend upon:

- Construction experience
- Safety training as outlined in section six of this manual

Specific responsibilities of the safety designee or dedicated safety representative include, but are not limited to the following:

a) **Employee Safety Orientation and Training**

- Conduct orientation sessions for employees new to the site prior to their beginning work.
- Participate in weekly toolbox safety meetings; assist field supervisors, as requested, with meetings.
- Conduct weekly supervisor safety meetings.
- Instruct supervisors on safety rules and regulations.
- Instruct employees in the proper use and care of personal protective equipment.

- Instruct employees concerning special procedures (e.g. lock-out, excavation, confined space entry, etc.) as required by OSHA or this manual.
- Conduct hazard communication training.
- Conduct respiratory training as required.
- Conduct emergency evacuation training.

b) Record Keeping

- Complete OSHA, state, federal, company and project specific reports.
- Complete accident investigation reports.
- Complete the Weekly Site Safety Review Form.
- Maintain training documentation.
- Complete and process the *CONTRACTORS* reporting requirements.

c) Safety Standards, Rules and Regulations Enforcement

- Authority to stop work.
- Authority to take immediate corrective action.
- Implement, maintain, and update, as required, conditions and project site specific safety policies and procedures.
- Interpret and implement site specific safety policies and procedures.
- Demonstrate, by example, proper safety behavior.

d) First Aid/Medical Treatment

- Ensure first aid supplies are adequate.
- Investigate accidents and complete or obtain accident reports.
- Coordinate transportation of employees with minor injuries to the subcontractor's first aid station.

e) General Responsibilities

- Keep the *CONTRACTOR* apprised of any safety-related problems that have or may develop.
- Conduct work area safety inspections and forward results to the *CONTRACTOR*.
- Conduct investigations of all accidents and incidents and forward reports to the *CONTRACTOR*.
- Compile OSHA statistical information and copy the *CONTRACTOR*.

3. Field Supervisors or Fore-persons

The field supervisors have the responsibility for overall training, control, and conduct of personnel on their crew. As first line supervisors, their role in the safety and health program is crucial because they set standards by which their employees work.

The field supervisors' responsibilities include, but are not limited to:

- Task specific safety training
- Safety inspection
- Tool box safety meetings
- Accident investigation

B. Subcontractor

The subcontractors, regardless of tier, are responsible for complying with the safety requirements outlined by the *CONTRACTOR*, even though the requirements may be above and beyond the subcontractor's own safety policies and federal and state OSHA requirements.

SECTION FOUR
SAFETY AND HEALTH PROCEDURES

The safety procedures established for this project are based on current work activities. Future work activities may require the development of additional safety procedures or clarification of existing policies and procedures.

It is the responsibility of each employee to work in a safe manner. However, it is ultimately the subcontractor's, regardless of tier, responsibility to see that all safety and health rules and practices are followed.

Safety is never to be sacrificed for production. The safety goal for this project is to eliminate accidents.

A. Excavations and Trenching

Prior to beginning any excavation, digging, trenching or drilling operation, subcontractors, regardless of tier, must ensure that all underground utilities have been located and verified by the responsible parties. Subcontractors, regardless of tier, must also give the *CONTRACTOR* forty-eight (48) hours notice prior to excavating. All OSHA requirements concerning safe trenching practices must be met.

B. Material Handling and Storage - Flammable and Toxic Materials

Flammable, toxic or other hazardous materials need to be stored in properly designated, well-ventilated areas. Be sure to coordinate such areas with the *CONTRACTOR*.

C. Personal Protective Equipment

All employees and visitors to the project site must use the protective equipment prescribed by local, state, federal, and project rules and regulations. It is the intent of the *CONTRACTOR* to control or minimize exposures that will or could lead to illness or injury. Therefore, anyone who refuses to use the prescribed protective equipment or who willfully damages such equipment shall be subject to removal from the project.

All personnel on the construction site must adhere to the following policies:

1. Eye Protection

a) Basic Eye Protection ANSI Z87.1 safety glasses with side shields shall be worn at all times while in the work area.

- Wearers of contact lenses must also wear appropriate eye and face protection devices in a hazardous environment. It should be recognized that dusty and/or chemical environments may represent an additional

hazard to contact lens wearers. Hazardous environments may include, but are not limited to, those in which a respirator may be required or where welding is being performed.

- Where appropriate, contact lenses may be worn if approved by both the contractor and the employee's physician. These approvals are to be documented and kept in the subcontractor's file on site. Employees will adhere to the project's basic eye protection policy.

b) Goggles

- If the task requires an employee to wear goggles, basic eye protection should not be worn since a good seal cannot be obtained.

c) Face Shield

- When the subcontractor's, regardless of tier, employees are exposed to flying particles, splashes, mists, etc., they must wear an approved face shield as well as basic eye protection (since a face shield provides only protection to the face and eyes from direct impact objects).

d) Welding Hood

- When welding, a welding hood as well as both basic eye protection and a hard hat must be worn. This is to protect employees from popping hot slag when the hood is raised and from overhead work exposures.

2. Head Protection

a) All project work areas are considered "hard hat areas".

b) Everyone, including delivery personnel, vendors and visitors must wear approved hard hats while on the project. Hard hats are not required in construction parking lots, enclosed vehicles and office trailers.

c) The subcontractor's, regardless of tier, company names are to be on all hard hats that are issued to their employees.

d) All hard hats must be of class "B" type and in good condition.

3. Hearing Protection

a) The safety representative or designee will monitor work areas to recognize and post high noise areas as required by 29CFR1926.52.

b) Once an area is posted, notify the *CONTRACTOR.*

4. Foot Protection

a) Everyone on the project must wear leather shoes or boots with good heavy soles.

b) No one is permitted to wear sneakers (including ANSI approved sneakers), tennis shoes or athletic shoes of any type, sandals, high heels or thongs on this project.

5. Clothing

Employees are to report to work properly attired. This project's requirements include:

a) Clothing in good repair. (Frayed or tattered clothing can be hazardous to employees).

b) No tank tops or sleeveless shirts. (Shirts must have at least 4" sleeves and be tucked in at all times).

c) Long pants only. No short pants, cutoffs, sweat pants, etc.

d) If working around moving machinery, no neckties, and gauntlet-type gloves and baggy, loose or ragged clothing.

e) No loose, dangling jewelry. Since jewelry such as rings, watchbands, necklaces, earrings and the like can cause or contribute to accidents; employees must take the proper precautions.

f) Shoulder length or longer hair must be tied back and put under the hard hat or worn in a hair net. (This will keep it from impeding vision, becoming entangled in machinery or preventing the use of personal protective equipment).

6. Fall Protection

The subcontractor, regardless of tier, must provide to their employees, appropriate protection against falls of six feet or more 100% of the time when employees are exposed. Fully evaluate the work conditions and environmental factors (including seasonal weather changes) before selecting the appropriate fall protection system (active, passive or a combination of measures, as appropriate). Such evaluation is to be recorded on the Safe Plan of Action form.

a) Types of Fall Protection Systems

1) *Personal fall arrest system* is a means used to arrest an employee in a fall from a work level. It consists of an anchorage, connectors, body harness and may include a lanyard, deceleration device, lifeline, or a combination of these.

2) *Positioning device system* allows an employee to be safely supported on an elevated vertical surface (such as a wall) and work with both hands free. **POSITIONING DEVICE IS NOT CONSIDERED FALL PROTECTION AND MUST BE USED IN CONJUNCTION WITH A FALL ARREST SYSTEM.**

3) *Warning line system* is a barrier erected to warn employees that they are approaching an unprotected edge. It also designates an area in which

work may not take place without the use of a guardrail, personal fall arrest system or a safety net to protect employees.

4) *Guardrail system* is a barrier erected to prevent employees from falling to lower levels. All guardrails must meet the requirements of 29CFR1926.502.

5) *Safety net system* can be used when workplaces are more than 25 feet above the ground, water surface or other surfaces where the use of ladders, scaffolds, catch platforms, temporary floors, safety lines or a safety harness is impractical.

b. Safety Harness

1) The only permissible personal fall arrest system on this project is an industry approved safety harness. Employees can use positioning belts with two "D" ring attachment points as long as they are used in conjunction with a safety harness.

2) Safety harnesses must be secured to an overhead object of substantial capacity capable of supporting five thousand (5000) pounds (e.g. pipe, structure, cable, or rope lifeline). In order to accomplish this and ensure 100% protection, the employee may need to use two lanyards. The primary lanyard is never unhooked until the secondary lanyard is secure.

c. Lanyards and Lifelines

1) Lanyard and lifeline selection is determined by the type of work as well as the environmental conditions. If lanyards, connectors or lifelines may be damaged by welding, chemical cleaning, sandblasting, etc., either protect the components or use a more appropriate type of securing system.

2) Lanyards and lifelines must incorporate or be used with an appropriate deceleration device. Deceleration devices include rope grabs, rip-stitch lanyards, specially woven lanyards, tearing or deforming lanyards, automatic self-retracting lifelines and lanyard, etc., which dissipate or otherwise limit the energy imposed on an employee during fall arrest.

3) Once in use, the system's effectiveness is to be monitored. In some cases, a program for cleaning and maintaining the system may be necessary.

4) Lanyards and lifelines must only use locking snap hooks.

5) Under no circumstances may two lanyard snap hooks be connected together.

7. Scaffolding

All scaffolds and platforms must meet the following requirements:

a) General Requirements

1) Scaffolds twenty-five (25) feet or more above the ground or floor are to be erected, moved, altered and dismantled only by experienced personnel and under the direct supervision of a competent person experienced in scaffold erection and maintenance.

2) Scaffolds six (6) feet or more above the ground or floor are to be completely decked and have handrails, mid-rails and toe boards installed. If for some reason, a platform or scaffold cannot be equipped with standard handrails or be completely decked, safety harnesses must be worn and properly tied off.

3) Chain guardrails on scaffolding are not allowed.

4) Overhead protection for employees on a scaffold is required if they are exposed to overhead hazards.

5) Barricade the area beneath the scaffold and post "working overhead" signs in all approach directions.

6) Scaffolds that will be higher than thirty (30) feet and a working load exceeding fifty (50) pounds per square foot, requires a licensed professional engineer to complete sealed and signed design drawings, including load calculations. Examples are scaffolds erected for plasterers, masons or any other trades who routinely store material on the platform.

7) Contact the *CONTRACTOR* if any special scaffolding issues arise.

b) Rolling Scaffolds

1) No one is to ride on a rolling scaffold while it is being moved.

2) All materials and tools must be secured prior to moving a rolling scaffold.

3) No rolling scaffolds will be utilized to support other scaffolds.

c) Scaffold Planking

1) Paint or stamp scaffold planks within 12" on each end or edge to denote use for scaffold decking only.

2) Use only 2" X 10" or 2" X 12" scaffold grade material for scaffold planking.

d) Tagging

The most effective means of communication between the scaffold builder and the scaffold user is a scaffold tag. The tagging procedures are as follows:

1) The crew that erects the scaffold must complete and attach the appropriate scaffold tag.

2) The scaffold tag must be placed at eye level on or near the access ladder so it is easy to locate and plainly visible.

3) A competent person needs to ensure that the scaffold is erected properly and the tag attached is proper and completely filled out.

4) If the scaffold needs to be altered in any way, the person who signed the tag must be contacted to authorize the change and re-tag if necessary.

5) An untagged scaffold must not be used.

6) If a scaffold is to be used for three days or more, a competent person must inspect it prior to each shift.

7) Tagging System procedure:

- A green tag is completed and attached by the erecting crew to scaffolds that have complete handrails, mid-rails, toe boards and decking.
- A yellow tag is completed and attached to scaffolds that cannot be erected with all the components complete. The yellow tag allows the erecting crew to note what portion of the scaffold is incomplete and cautions the user. A yellow tag also informs the user that fall protection may be required.
- A red tag means the scaffold is being dismantled not yet completely erected or for some reason not safe and shall not be used.

8. Welding and Cutting

All welding and cutting operations are required to have a hot work permit issued by the *CONTRACTOR*.

9. Electrical

Only qualified electricians may perform electrical work.

10. Lock-Out Procedures

Due to the scope of this job, the procedures used for energy isolation, be it electrical, mechanical, hydraulic, pneumatic or other types, need to be both uniform and coordinated. Therefore, the *CONTRACTOR* has adopted the following procedures which must be communicated to the subcontractor, regardless of tier, and employees. Make sure they are aware of, understand, and follow these lock-out procedures and cooperate with other contractors who require a lock-out that involves your work.

Note that the *CONTRACTOR* requires the use of lock-out energy isolation devices (that is, using padlocks) throughout this project. Tag-outs (simply tagging the switch, valve, etc.) will not be used on this project.

a) Individual Lock-out Procedures

This procedure is used in the event power is either interrupted or restored unexpectedly. If interrupting or restoring power unexpectedly will endanger an employee of any other contractor, including your own subcontractors, use the steps in "2" Complex *Lock-out Procedures* that follow.

Only an authorized employee shall perform all of the following steps:

1) Notify all of affected employees of the lock-out and the reason for it.
2) Shutdown the affected equipment in a manner consistent with good operating practices.
3) Verify that the equipment or system is inoperative by trying to operate it, etc.

4) Shutdown the power at the switch, valve, etc., that will be locked. Be absolutely certain the correct device or devices to shutdown and lock were located.

5) Safely dissipate any stored energy in pressure lines, flywheels, capacitors, etc., consistent with good operating practices.

6) Lock the switch, valve, etc., using a padlock with only one key. Make sure the company's name is on the lock.

7) Complete and place on the lock a standard lock-out warning tag indicating what power source was shutdown, the date of the shutdown, authorized employee's name, and the company's name.

8) Verify that the equipment or system is inoperative by trying to start it. (Do not forget to turn all controls back to their off or neutral position).

9) Complete and file on site a Lock-Out form.

10) When power is ready to be restored, replace all missing guards. Ensure that no one will be endangered by power restoration prior to removing the lock.

11) After removing the lock, remove and properly destroy the warning tag. (Tags and their attachment devices are not to be reused unless designed for reuse).

b) Complex Lock-out Procedures

This procedure must be used when one or more employees of another subcontractor may be exposed to danger in the event power is either interrupted or restored unexpectedly.

Only an authorized employee shall perform all of the following steps as the originator of a complex lock-out. Every affected contractor (including affected subcontractors) is to have an authorized employee to coordinate the lock-out for their company.

1) Hold a coordination meeting with all affected subcontractors, regardless of tier, at least twenty four (24) hours in advance of the lock-out. Also, inform the *CONTRACTOR* twenty four (24) hours in advance. A member of the *CONTRACTOR'S* team may wish to attend the meeting or monitor the actual lock-out operations.

2) Notify all affected employees of the lock-out and the reason for it.

3) Shutdown the affected equipment in a manner consistent with good operating practices and have each affected subcontractor do likewise.

4) Verify that the equipment or system is inoperative by trying to operate it and have each affected subcontractor do likewise.

5) Shutdown the power at the switch, valve, etc., that will be locked. Be absolutely certain the correct device or devices to shutdown and lock were located.

6) Safely dissipate any stored energy in pressure lines, flywheels, capacitors, etc., consistent with good operating practices and, as necessary, have each affected subcontractor do likewise.

7) Place a chain or lock-out device on the switch, valve, etc., that will be locked.

8) Place a chain or lock-out device using a padlock with only one key. Make sure the company's name is on the lock.

9) Once all the valves and switches are locked out, place all the keys for all the locks in the group lock-out box.

10) The authorized employee then places a group lock-out device (Christmas tree) on the hasp and places his lock on the group lock-out device. Each employee must place his/her personal lock, with his/her name on the lock, on the group lock device.

11) Complete and place on the lock a standard lock-out warning tag indicating what power source was shutdown, the date of the shutdown, authorized employee's name, and the company's name.

12) Verify that the equipment or system is inoperative by trying to start it and have each affected contractor and subcontractor do likewise. (Do not forget to turn all controls back to their *off* or *neutral* position).

13) Complete and file on site a Lock-Out form.

14) When power is ready to be restored, replace all missing guards. Each affected employee must remove their lock when their work is completed. The authorized employee then removes his/her lock and removes the keys from the lock box and begins to restore the equipment to working condition. As the originator of the lock-out, the authorized employee will always remove their lock last. This is only after it has been determined that no one will be endangered by power restoration.

15) Restore power.

16) After removing the lock, remove and properly destroy the warning tag. (Tags and their attachment devices are not to be reused unless designed for reuse).

c) <u>General Information</u>

1) Padlocks, hasps, tags, and other lock-out devices must be durable enough to withstand the environment to which they will be exposed.

2) Locked-out switches, valves, etc., must not be operated regardless of the circumstances.

3) Only the employee, who placed the lock on the switch, valve, hasp, etc., can remove it. Anyone who removes or defeats another's lock-out is subject to removal from the project site.

4) Locked-out switches, valves, etc. must be inspected at the beginning of each shift to insure that the locks and tags are still in place.

11. Powder Actuated Tools

Subcontractors, regardless of tier, shall ensure that employees using powder actuated tools be certified by the manufacturer's representative prior to use.

Subcontractors using powder-actuated tools shall ensure that all cartridges, whether used, not used or misfired, have been picked up and removed from the work area.

12. Steel Erection

Steel erection requires compliance with the following:

a) Employees of subcontractors, regardless of tier, must comply with the fall protection requirements covered earlier in this section.

b) Conduct and document appropriate pre-task planning and a job safety analysis for all steel erection. Keep this documentation on site for review by the *CONTRACTOR*.

13. Work Platforms Suspended From Cranes

The use of a crane or derrick to hoist employees on a personnel platform is prohibited, except when the erection, use, and dismantling of conventional means of reaching the worksite, such as a personnel hoist, ladder, stairway, aerial lift, elevating work platform or scaffold, would be more hazardous or is not possible because of structural design or worksite conditions.

The safety representative or designee must give the *CONTRACTOR* reasonable notice prior to any operation requiring the use of personnel platforms suspended from a crane.

Prior to the use of a work platform suspended from a crane, the subcontractor, regardless of tier, will prepare a written record for each such operation and will maintain a file documenting its operation. Each record is good only for lifts made from a single crane set-up location. Traveling, repairs or modifications of the crane will require a new record.

Each record is to:

a) Be initiated by the supervisor of the employee who will be working from the platform

b) Describe the work to be performed and its exact location

c) List all required inspections, certifications, tests, and pre-lift meetings

d) Be signed by the crane operator, rigger, and initiating supervisor

e) Note the name of the person who will flag or signal the crane operator

f) Remain with the crane while the personnel hoist is in progress

g) Be available to the *CONTRACTOR* for review, upon reasonable notice

14. Fire Prevention and Protection

a) It is the responsibility of the subcontractor, regardless of tier, to have the appropriate fire suppression equipment readily available and manned by employees trained in its proper operation.

b) Immediately report all fires (even those that have been extinguished) to the *CONTRACTOR'S* management.

c) Replace or recharge temporary fire fighting and fire protection equipment immediately after use. Also report to the *CONTRACTOR* within eight (8) hours any discharge of fire fighting equipment.

15. Job Safety Analysis

The subcontractors, regardless of tier, are to conduct a Job Safety Analysis (also known as a JSA) on any non-routine task. In certain circumstances the *CONTRACTOR* may require the subcontractors, regardless of tier, to do a JSA on specific routine tasks as well.

SECTION FIVE
ORIENTATION

One of the requirements of all subcontractors, regardless of tier, and their safety representatives or designees is to conduct a complete basic safety orientation of all of their employees new to the site. The purpose of the orientation is to provide employees an awareness of what they can expect and what is expected of them on this site.

A. Scope

At a minimum, the orientation will include:

- Employee safety requirements and policies
- Site specific safety and health rules (found in *SECTION FOUR* of this manual)
- Permitting procedures (if applicable), including work permits, excavation, confined space entry, lock-out, etc.)
- Hazard communication training
- Emergency alarms and evacuation procedures
- Other topics as circumstances require

ORIENTATION GUIDE LINES ARE SUPPLIED IN

SECTION 11

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SECTION SIX
SAFETY TRAINING

A. Required Safety Training

1. Field Supervisors

First line field supervisors will be required to complete the OSHA 10-hour Construction Safety and Health course if:

- a subcontractor's, regardless of tier, contract award is in excess of $250,000 dollars for construction or installation services on the site

Or

- a subcontractor, regardless of tier, has more than 10 employees on site

If supervisors have not attended this course within the past 12 months, the field supervisors will be required to attend within 60 days of assignment to the project.

The *CONTRACTOR* may also require supervisors to attend this training if safety observations indicate a supervisor would benefit from this course.

2. On-Site Safety Representatives

Certain subcontractors are required to have a full time On-Site Safety Representative. The individual is required to:

- Have at least five years experience in construction *or*
- hold a current CSHT (Certified Safety and Health Technician) *or*
- have completed the OSHA 30 hour Construction Safety and Health course within the past 24 months *or*
- Have completed the OSHA 500 course within the past 24 months.

3. Safety Designees

Certain subcontractors are required to have a Safety designee. This individual is required to have completed the OSHA 10-hour course within the past 24 months.

4. Specialized Training

Any employee operating equipment to include but not limited to Lulls, Forklifts, Scissors Lifts, Telescope Lifts and Cranes must meet or exceed the training requirements or recommended by OSHA (Occupational Safety and Health Administration) and/or ANSI (American National Standards Institute, Inc.)

SECTION SEVEN
RECORD KEEPING REQUIREMENTS

A. Introduction

The *CONTRACTOR* believes that proper documentation and record keeping of safety related functions are essential. All required documentation needs to be maintained and available to the *CONTRACTOR* upon request. The subcontractors, regardless of tier, are responsible for ensuring that record keeping and related requirements, as outlined in this section, are accurate and up-to-date.

B. Posters

Post in a conspicuous place the Project Safety Alerts and Bulletins issued by the *CONTRACTOR* as well as the posters required by federal and state regulation.

C. Signs

The subcontractor, regardless of tier, will need to furnish appropriate signage in accordance with the contract, depending on the nature of their work and work area, such as (but not limited to):

- *Hard Hats, Required Beyond This Point* (posted at all entrances to the project site and work areas).
- *Danger - Construction Area - Authorized Personnel Only* (posted at all entrances to the project site).
- *Drugs, Alcohol, Firearms and Related Paraphernalia are Prohibited on the Project* (posted at all entrances to the project site).

D. Filing of Records

A copy of all records shall be submitted to the *CONTRACTOR*.

1. **Incident Investigation Report -** Complete an incident investigation report for each near-miss that does not result in injury or damage to equipment. Provide a copy to the *CONTRACTOR* within eight (8) hours of the incident.
2. **Accident Investigation Report -** Complete an accident investigation report for each accident resulting in injury or damage to materials or equipment. Give a copy to the *CONTRACTOR* within eight (8) hours of the accident.
3. **Weekly Tool Box Safety Meeting Report -** Complete the Weekly Tool Box Safety Meeting form at the end of each week's meeting. Forward a copy to the *CONTRACTOR*.

SECTION EIGHT
ADMINISTRATIVE POLICIES

A. OSHA Inspections

Inspections by OSHA compliance officers may be initiated for many reasons, including employee complaints, serious or fatal accidents, special emphasis programs or planned audits. When the subcontractor, regardless of tier, receives notification of an impending inspection, contact the *CONTRACTOR* so a representative of the *CONTRACTOR* can be present during the actual inspection. It is the *CONTRACTOR'S* policy to fully cooperate with OSHA compliance officers.

B. Accident and Incident Investigations

1. Accidents

All accidents, which result in first aid treatment, must be investigated by the subcontractor's, regardless of tier, safety representative or designee and documented on a project Accident Investigation report. The report must be completed and submitted to the *CONTRACTOR* within eight (8) hours of the accident.

2. Incidents

All incidents, whether they involve injury or not ("near-miss") must be investigated by subcontractor's, regardless of tier, safety representative or designee and documented on a Project Incident report. The report must be completed and submitted to the *CONTRACTOR* within eight (8) hours of the incident. However, if the incident was serious (e.g., potentially life threatening), notify the *CONTRACTOR* immediately.

Major Accidents

Immediately notify the CONTRACTOR of all major accidents.

a) All accidents resulting in a lost-time injury, fatality, or damage to property or equipment must be investigated by the subcontractor's, regardless of tier, field supervisor or safety representative. A representative of the *CONTRACTOR* and /or Hilb Rogal and Hobbs may join in the investigation.

b) A thorough in-depth accident investigation includes, but is not limited to, the following:

- An analysis of the accident
- A documented signed witness statement
- Accident scene photographs, sketches, and drawings

- Recommendations to prevent re-occurrence

c) Forms to be utilized in accident investigation reporting may include:

- Accident Investigation Report
- First Report of Injury
- Report of Disabling Injury or Fatality

d) The insurance carrier personnel may join the subcontractor's, regardless of tier, safety representative in the investigation of job site accidents.

4. Special Investigations

a) Special investigations fall into areas such as potential third party litigation, non-project personnel injury, equipment or material failure, etc., which relate to the project.

b) All special investigations will be coordinated by the *CONTRACTOR*.

SECTION NINE
HAZARDOUS CHEMICALS

A. Hazardous Materials and Hazardous Waste

1. All subcontractors, regardless of tier, will need to provide to the *CONTRACTOR* a list of hazardous materials that will be used on the project site.
2. An EPA ID number will need to be obtained for the hazardous wastes produced by the contractors and/or subcontractors.
3. All hazardous wastes produced by the subcontractors, regardless of tier, must be removed from the project site by a licensed hazardous waste hauler. Such loads will need to be manifested and a copy of the manifest sent to the *CONTRACTOR*.
4. All hazardous materials must be properly labeled and stored until removed from the project (by a licensed hazardous waste hauler).
5. Hazardous materials or hazardous wastes stored in 30 or 55 gallon drums are to be placed on spill containment pads.
6. Report all accidental releases of a hazardous material or hazardous waste promptly to the *CONTRACTOR*. If the release is of a reportable quantity, the responsible subcontractor, regardless of tier, will notify the appropriate regulatory agency.
7. Proper clean-up of accidental releases of hazardous materials waste will be done by the responsible subcontractor. Clean-up is to be done by properly trained personnel. Hazardous waste from the clean-up must be hauled away by a licensed hauler.

   Depending on the hazardous materials spilled, the *CONTRACTOR* may require the responsible subcontractor to hire a certified laboratory to take an appropriate number of soil samples to test at their laboratory.
8. Subcontractors, regardless of tier, must inspect their hazardous material and waste storage areas at least weekly to ensure they are properly maintained.
9. The *CONTRACTOR* will randomly audit the labeling and storage of hazardous material and waste and the disposal of hazardous waste to verify that all subcontractors, regardless of tier, are fulfilling their roles as responsible parties.

B. Material Safety Data Sheets (MSDS)

In addition to the hazardous chemical list required above, The *CONTRACTOR* or another subcontractor may request copies of the most current MSDS on a chemical being used by other subcontractors, regardless of tier.

SECTION TEN
EMERGENCY PROCEDURES

A. Emergency Management Plan

1. Introduction

In the event of a catastrophic accident involving the subcontractors, regardless of tier, notification of appropriate personnel is necessary to minimize injury and/or structural damage. Catastrophic accidents include, but are not limited to the following

- Any accident that results in life threatening or fatal injuries to any person on the project
- Collapse of a structure such as a crane, scaffold or building
- Fires requiring Fire Department involvement to extinguish
- Accidental release of a hazardous material on or in the area surrounding the project site

It is imperative that all possible steps be taken to prevent an emergency situation such as those mentioned above. Should such an emergency occur, notification should be made to the following:

The *CONTRACTOR'S* Site Management

The CONTRACTOR'S Director of Safety

a) Under no circumstances are the subcontractors, regardless of tier, to make comments, statements or engage in interviews to the media. Such statements will be issued only through the CONTRACTOR.

B. Emergency Notification

1. Medical

For first aid response, notify the subcontractor Safety Representative. For additional emergency response assistance you should call 911. Notify the site management immediately.

2. Fire

Immediately notify the *CONTRACTOR'S* site management of any fire.

3. Property Damage

Notify the *CONTRACTOR'S* site management of any damage to the project.

C. Emergency Medical Transportation

It is the subcontractor's, regardless of tier, responsibility to arrange for emergency transportation of any injured employee who is not able to drive himself or herself to the emergency medical clinic or to the hospital.

D. Severe Weather

Severe weather procedures are utilized for impending threat of hurricane, high winds, tornadoes, heavy rain, or lightning storms.

1. General Procedures

a) The subcontractor, regardless of tier, will need to develop and submit a copy of their site specific severe weather plan to the *CONTRACTOR*. This plan will include a complete list of management personnel, in order of authority, to contact in the event of an emergency on this site. The list needs to be kept current and include the after-hours telephone numbers of the individuals to be contacted.

b) Develop a "Call-In" team for post storm activities.

c) Firmly anchor field trailers, temporary buildings and materials.

d) Lower crawler and mobile cranes at the end of each shift if possible. Cranes not capable of lowering booms are to be secured in accordance with the manufacturer's recommendations.

E. Project Rules and Regulations

Good conduct is essential to the common good of all employees and the speedy progress of the job. Undesirable conduct including, but not limited to the following will not be tolerated:

1. Unauthorized possession of any project property or material
2. Possession of or use of intoxicants on premises, regardless of source
3. Engaging in disorderly conduct
4. Gambling, including sale of chances
5. Fighting on project premises
6. Unauthorized sleeping on the job during working hours
7. Failure to wear or use required safety equipment
8. Failure to observe safety, sanitary or medical rules and practices
9. Illegal possession or use of narcotics or non-prescribed tranquilizers or pep pills on premises, or attempting to bring them on job site

10. Possession or use of firearms, weapons, or explosives is expressly prohibited on the project premises

11. Willful defacing or damaging of equipment, tools, material or other property of the project.

SECTION 11

APPENDIX PAGE

ORIENTATION ACKNOWLEDGMENT FORM

Date: _____

Project Name: _____
Subcontractor: _____

My signature below acknowledges my completion of the project safety orientation and review of the project safety rules and regulations. I agree to adhere to these, as well as all other specific project rules and regulations.

SAFETY RULES AND REGULATIONS TO BE COVERED IN ORIENTATION

Clothing Requirements
Eye Protection
Head Protection
Foot Protection
Fall Protection
Welding and Burn Permits
Ladders and Stairway
Material Handling
Trenching and Excavations
Work Permits
Fire Protection
Housekeeping
Scaffolds and Arial Lifts
Drugs, Alcohol and Weapons
Electrical
Barricades and Railings
Powder Actuated Tools
Confined Space

PRINT NAME	SIGN NAME

(Use next page if needed)

Supervisor giving Orientation:

_____

ORIENTATION SIGN IN SHEET

PRINT NAME	SIGN NAME

Project Name: ______________________________________

Subcontractor; ______________________________________

ORIENTATION

All personnel have a safety responsibility to themselves and to fellow workers around them. These safety rules apply to all personnel on all jobs. Special additional rules may be established by the Contractor depending on the activity involved. Willful violation or repeat violations of these or other safety rules of the project shall be cause for immediate dismissal.

Report unsafe conditions or unsafe acts to your Foreman or Superintendent for correction. If corrections are not made in a timely manner personnel are encouraged to speak to Contractor Supervisory Personnel or the Contractor Corporate Safety Director.

Report all injuries, accidents and incidents regardless of severity, to your foreman. Contractor shall be notified within 8 hours.

The possession of firearms, explosives and other weapons on the job is prohibited.

Glass bottles and containers are prohibited on site.

Hard Hats shall be worn by everyone on the job at all times.

Safety shoes are encouraged. Sturdy, heavy-duty work shoes are required. Canvas, tennis and loafer types of shoes are prohibited.

Work gloves shall be worn when handling rough edges or abrasive material or when the work subjects the hands to any type of injury.

Eye Protection (goggles, safety glasses w/ side shields, full face shield, welding hood, etc.) shall be worn when sledging, hammering, sawing, chipping, welding, grinding, working in dusty places, handling of acids, peening, cleaning walls or other operations where eye injuries may result.

Hearing protection in the form of ear muffs or approved ear plugs shall be worn in all high-noise level areas.

Respiratory protection shall be used as required per the operation being performed.

Fall Protection is required at elevations of 6 feet or higher.

The speed limit on all jobsites is 8 mph.

Shirts with sleeves are to be worn by all personnel at all times. Shorts are prohibited.

Use of gasoline is prohibited for cleaning and for starting fires. Small quantities of gasoline may be transported only in approved safety containers. Plastic gas cans or metal cans which do not have the safety spring closer are prohibited on the jobsite.

Unsafe tools, defective or frayed electrical cords and unguarded machinery shall be reported to your Foreman or Superintendent. If found on site during an inspection defective tools will be removed.

"No Smoking" rules shall be observed in posted areas.

Tampering with or unauthorized removal of fire extinguishers from assigned locations is prohibited and shall be cause for immediate dismissal.

Passenger riding of any heavy construction equipment (i.e. track hoes, front end loaders, forklifts) is prohibited.

Getting on or off a vehicle or equipment while in motion is prohibited.

The Operation of any equipment without proper authorization and training is prohibited.

Seat belts shall be worn in all moving vehicles when so equipped.

Cranes, backhoes or other equipment with booms must be operated with caution around power lines.

No one shall work under suspended/lifted loads. Equipment operators shall not lift loads over personnel or occupied buildings at any time.

Personnel shall not operate any machinery, equipment or tools unless they have been properly instructed in its use and are thoroughly familiar with all details of its operation.

Defective or unsecured ladders shall be reported to your Foreman or Superintendent and immediately removed from service.

Do not go up or down a ladder without the free use of both hands. If material or tools have to be handled, use a rope to lift or lower them. Always face ladder when climbing, descending and working. Standing on the two upper rungs/steps is prohibited - see ladder manufacturer's instructions.

Hand tools shall not be used for any other purpose than that intended. All damaged tools shall be removed from service.

Tools and other objects should not be left on scaffolds, ladders or overhead working surfaces.

Electric power tools shall be properly grounded before being put into operation. GFCI use is mandatory. Extension cords shall be 10 or 12 gauge, type S, ST, or SO. All equipment should bear the manufacturers UL Label.

Know the correct way to lift heavy objects, and get help if needed. (Secure footing, firm grip, back straight, lift with legs.)

Acetylene, oxygen or other compressed gas cylinders are to be stored separately and securely in upright positions a minimum of 20' apart by tying or blocking into position. Cylinders are considered in storage when caps are in place, therefore cylinders may not remain unused on carts over a 24 hour period. No Smoking-Compressed Gas signage is to be posted in storage areas.

No one shall remove a cover or guard rail system from any floor opening without specific authorization.