

McPherson Contractors, Inc. Corporate Safety Manual

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SAFETY
PROCEDURES

SECTION 1

Safety is a vital part of our company's everyday activities. We have prepared this guide to assist you in managing this important part of your project. The manual provides instructions for meeting a number of safety requirements. It is not intended that this project specific safety procedure manual be confined to the following requirements. These rules are usually general, and should be used in conjunction with more specific federal, state and local regulations. Whenever the two conflict, the more stringent regulations should be applied.

This information supplements the requirements placed on us by government and owners. The Project Manager and Superintendent should use this manual to prepare a project safety pre-plan and use it as a reference guide throughout the project. This practice will help you organize your safety efforts from the start.

Safety is an integral part of our quality improvement techniques, and the processes we use will change as we develop safer ways of performing our services. We encourage you and all employees to share your ideas or offer comments to your Project Manager or Immediate supervisor, so we can review them and give them our immediate attention, and possibly include them in the manual for use on other projects.

ADMINISTRATION

SECTION 2

POLICY 2.A

Protecting the public and our employees is the most important part of any work we do. It is the policy of McPherson Contractors Corporation to perform all work with the highest regard to safety of all our employees and contract associates.

Safety must never be compromised. It is part of quality workmanship, and the mark of true professionals. We will meet or exceed government standards in the performance of our work. Safety is of the utmost importance in the performance of all duties and must not be neglected in emergencies or because of undue haste.

No job is so important or service so urgent that we cannot take the time to perform our work safely. Every employee on every project must assume responsibility for safety as a personal duty. Our employees have direct control over our safety program's success and benefit most from it.

Our project management is responsible for completing jobs safely with zero accidents. The company provides support services to assist in raising safety awareness on-site and training employees, managers, and supervisors to work safely.

Our objective is to assure that no one is allowed to work in a way that endangers life or health.

Williams Sims
Vice President
McPherson Contractors, Inc.

Mark Roggy
Safety Director
Progressive Environmental and Safety

COMPLIANCE AND DISCIPLINARY POLICIES 2.B

Disregard for stated safety practices or policies, or failure to report unsafe acts or conditions, may be cause for immediate dismissal. This policy applies to all company employees.

Subcontractor employees may be removed from our sites for failure to comply with our safety policies and procedures.

It is important that you recognize that we take your safety seriously, and in return we expect you to strictly follow all safety procedures noted in this manual. Every employee will be placed under a **three-step** progressive disciplinary program noted in this section. An **“Employee Warning Notice”** is located in the appendix section of this manual for recordkeeping. This form should be used by the Supervisor and placed in the jobsite employee files. However when an employee is involved in a case of serious or gross misconduct, progressive disciplinary action will not be involved, and the employee will be subject to disciplinary action up to termination of employment.

Three-Step Employee Disciplinary Program

First Violation – Verbal warning of non-compliance and advisement of corrective action;

Second Violation – Written warning of non-compliance and advisement of corrective action;

Third Violation – Written documentation of non-compliance and termination of employment;

RESPONSIBILITY 2.C

PROJECT MANAGERS

The project manager has primary responsibility for establishing a properly functioning project safety program.

The project manager's specific duties include:

1. Checking plans, specifications, and construction methods to identify any special hazards in advance, using the help of the Project Superintendent.
2. Arranging a pre-job planning meeting with the Project Superintendent and major subcontractors to evaluate these hazards and review the jobsite safety program.
3. Making sure that all supervisors are aware of their safety responsibilities, are trained to perform them well, and carry them out.

* See "Training" - Section 2.G

4. Reviewing subcontractor safety standards to make sure they meet company standards.
 - * See "Subcontractors" - Section 2.J
5. Making sure that all of the safety equipment needed for the job is provided.
6. Holding periodic review sessions with supervisors to make sure safety duties are being carried out successfully.
7. Maintaining an understanding of safety by reviewing safety policies, attending meetings, and being part of other company activities provided to promote job safety.

SUPERINTENDENTS

The Superintendent has primary responsibility for implementing the safety program at the project on a daily basis.

Specific duties include:

1. Planning safety measures before the job starts and responding to any unsafe conditions during the job to insure safety.
 - * See "Project Start-Up" - Section 2.D
2. Reviewing the safety manual with each foreman before starting the job and providing each foreman with training in safe work procedures.
 - * See "Training" - Section 2.G
3. Making sure that subcontractors meet company safety standards.
 - * See "Subcontractors" - Section 2.J
4. Verifying that the safety program is effective, and that the job is safe, through daily inspection.
5. Providing the safety equipment required for the job.
6. Reporting serious incidents to the Project Manager immediately.
7. Investigating all accidents and unsafe conditions and completing the necessary reports.
 - * See "Accident Investigation" - Section 2.I
8. Providing for the care of injured employees. This includes following the Workers' Compensation policy, maintaining contact with the injured employee, conferring with

the Workers' Compensation Administrator, and making provision for light duty employment.

* See "Workers' Compensation" - Section 2.F

9. Supporting the company's loss prevention efforts by cooperating with the Project Manager, and other loss control agencies.
10. Conducting jobsite safety meetings at least monthly.

* See "Meetings" - Section 2.H

FOREMEN

The foremen have direct control of their crews. This means they also have the most direct control of the safety program in the field. The importance of the foreman's safety efforts cannot be overstated. Specific duties include:

1. Training employees in working effectively by working safely.

* See "Training" - Section 2.G

2. Conducting weekly safety meetings that identify and address safety problems with their crews.

* See "Meetings" - Section 2.H

3. Maintaining safe work areas that meet company standards with their crews.
4. Reporting unsafe conditions and accidents.
5. Enforcing company safety policy and terminating employees who do not follow company safety policy.

EMPLOYEES

The company will make every attempt to insure the continued safety and health of its employees. In return, employees are required to use good judgment and comply with company safety policies. Each person must accept responsibility for their own safety by working safely and insisting that their co-workers do the same.

Specific duties include:

1. Using good judgment to protect their own safety as well as that of their co-workers.
2. Using the required safety equipment.
3. Staying on the alert for unsafe conditions or activities and reporting them.
4. Following safety instructions given by the foreman or Superintendent.
5. Complying with company policies and good safety practice.

6. **Proper Clothing** must be worn at all times which consist of the following with discretion left to the Jobsite Superintendent:
 - A. Shirts shall be worn by all workers on site. Short sleeve or sleeveless shirts are acceptable, but they shall cover the upper shoulder from the base of the neck to the arm. The shirts shall also cover the trunk of the body, starting at the base of the neck to the belt line. Tank tops, midriffs or shirts with deep cut necklines or arm pits are not allowed. These shirts do not afford proper protection from the elements or hazards encountered on site.
 - B. Heavy-duty trousers covering the length of the leg to the boot top must be worn while on site. Shorts or cutoffs are not allowed. This apparel does not protect the legs from the elements or hazards encountered on site.

PROJECT START-UP 2.D

The safety program shall be in place from the first day on each project. Each of the following items should be completed by those responsible before the work begins.

1. **Employee Emergency Notification Forms** are maintained in each employee's file at the office.
2. **Emergency Response** - The Superintendent should contact the local fire department, police, and the chosen medical provider to notify them of our presence and determine any special concerns they may have, and review the jobsite needs for a site-specific safety plan.
3. **Safety and First Aid Equipment** - The Superintendent should order the supplies necessary before the work begins, and have enough supplies at all times to serve the total number of employees accessing the kits.
 - * See "Personal Equipment" - Section 15.
3. **Site Security** - The Superintendent should erect fences, barricades, jobsite safety posters, and warning signs necessary to adequately protect the public.
 - * See "Security" - Section 23.
4. **Medical Care** - The project manager should assist the Superintendents interview and select a designated medical provider before the project begins. Also a list of First Aid Trained persons should be kept to ensure 1 person is available at all times.
5. **New Hire Orientations** – All newly hired MCPHERSON CONTRACTORS employees are required to participate in the New Hire Orientation. This orientation will introduce new employees to these corporate safety procedures and policies, as well as the expectations of our company and what is expected of them while employed.

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OSHA 2.E

It is company policy to fully cooperate with inspections by enforcement agencies such as the Occupational Safety and Health Administration (OSHA).

The following guidelines must be followed when an OSHA or other agency representative arrives at our project:

Inspections: What to do when a Compliance Officer arrives at the jobsite. Use the OSHA Inspection Questionnaire at the end of this section as a guide.

1. **OSHA Inspector arrives.**
2. **Call Safety Director or other designated MCPHERSON CONTRACTORS representative.**
3. **Be polite, respectful, and cooperative.**
4. **Request to see the Inspector's credentials.**

Get a copy, if possible, of the Compliance Officer's work assignment for your site (usually a building permit or Dodge Report, or a copy of a complaint.) MCPHERSON CONTRACTORS may want to contest an alleged violation, so record all pertinent information. The names, business affiliation and addresses of all persons present should be written down.

If a complaint is involved, you should ask:

- If the party(s) filing the complaint requested that their name be withheld. If s/he made no such request, then the disclosure of the name of the party initiating the complaint is allowed.
- Whether the complaint was filed by a present or past employee, customer, subcontractor, material supplier, or by a person not directly employed around the workplace involved; the answers to these questions may be extremely important to us. In most cases, an inspection should not be permitted if the complaint was filed by someone other than present employees or their representative, unless the complaint involves an imminent danger situation.

Ask the Inspector the nature of the inspection.

OSHA has established the following system of inspection priorities:

- **Imminent Danger** situations are given top priority.
- **Catastrophes and Fatal Accidents:** Investigation of fatalities and accidents hospitalizing three (3) or more employees are second priority. OSHA must be notified within eight (8) hours. Investigations are made to determine if OSHA standards were violated and to avoid recurrence of similar accidents.
- **Employee Complaints:** Written and signed complaint by current employee. If it is a complaint, ask for copy. (Inspections should include only the area of complaint accessed by the most direct route.)
- **Programmed High Hazard Inspections:** A special program that targets inspections at the most dangerous work places.

- **Other Programmed Inspection** (also referred to as **General Inspection**): Randomly chosen low-hazard and non-manufacturing sites.
- **Follow-up Inspections:** Re-inspection of earlier inspections to determine whether previously cited violations have been corrected.
- **Other types** of inspections could include: referrals, fax complaints, or focused inspections (very limited).

Opening Conference

The Opening Conference may begin prior to the arrival of the Safety Director or other designated MCPHERSON CONTRACTORS representative. You may ask the inspector a delay of up to *1 hour* to wait for the appropriate MCPHERSON CONTRACTORS representative to arrive.

Before starting the inspection, the Compliance Officer should explain the nature of the inspection, the general scope, and outline records s/he wants to review and the employees s/he wishes to question. You should request permission to notify the following parties that an inspection is underway at the jobsite:

The customer
Other contractors, subcontractors

The Compliance Officer may ask questions necessary to obtain information to complete the inspection, such as:

Number of Employees
Number of Injuries/Illnesses at site
Name and address of subcontractor(s)
Hazard Communication Program – Material Safety Data Sheets (MSDS)
Size of Project – Dollar Amount
Length of Project – Completion Date

Be friendly and answer the questions, but only if you know the answers. Do not guess - it may be important later. Do not offer any additional information that is not requested of you. **It is your right.**

The Inspection

It is appropriate to ask the Inspector to wait until the Company's designated representative can be notified. OSHA can allow up to one hour, or as reasonable.

The following individuals shall be contacted in the event an OSHA Compliance Officer shows up on a jobsite:

NAME	TITLE	TELEPHONE

If the Inspector is seeking to inspect without probable cause or to make an unreasonable inspection of the jobsite, consider requesting the Inspector to obtain a search warrant in order to enter a jobsite. We will not require that the Inspector obtain a warrant before permitting entry under normal circumstances.

Probable cause for an inspection exists if the employer has been selected for an inspection by a neutral process (a programmed inspection), if an accident has occurred, if an employee complaint has been filed, or if an Inspector has witnessed a violation from outside the premises. In all these situations (other than a programmed inspection), probable cause to inspect exists only to the extent and scope required to investigate the accident, complaint or violation at issue and a copy of the inspection prompting paperwork should be provided to the Company. We may resist efforts to expand an inspection beyond the circumstances for which there is probable cause by requesting a search warrant.

A. Rights to Reasonable Inspection

The OSHA Act guarantees employers the right to a reasonable, orderly and fair inspection. The inspection must be:

- 1) At a reasonable time
- 2) To inspect within reasonable limits
- 3) In a reasonable manner
- 4) To question a reasonable number of employees if there is not an authorized representative of employees.

If the investigation involves a complaint, the Compliance Officer may inspect and interview only with respect to matters reasonably related to the complaint. After preliminary investigation, if you believe that a request is unreasonable, you must use careful judgment and good faith in handling the situation. You can discuss the matter with the Compliance Officer and explain why you think his/her request is unreasonable. If s/he insists on the request, then you may either give in or ask the Inspector to wait until top Management can be consulted. If you have strong convictions that the request is unreasonable and unnecessary, you should consult with the MCPHERSON CONTRACTORS Supervisor, Safety Director or another designated MCPHERSON CONTRACTORS representative before proceeding. There will probably be other areas that the Compliance Officer may wish to inspect while Management is making a decision.

Avoidance of Disruption

The United States Department of Labor's regulations direct Compliance Officers to conduct investigations to avoid any undue and unnecessary disruption of the normal operations of the employer. You should inform the Inspector of the day's schedule and assist him/her in conducting the investigation in a manner least disruptive of work.

B. Inspection Procedures

Accompany the Officer

This is an employer's right and a most important one, since in most cases you may be the only spokesperson for the company during the inspection, as well as the eyes and ears of Management for any contest proceeding later. The Company Representative is to take the OSHA Inspector to the site to be inspected by the most direct route, providing the fewest additional opportunities for unrequested inspections. The OSHA statute gives the Compliance Officer the authority to interview employees, privately if s/he wishes, and to examine machinery or equipment. The Compliance Officer is also permitted to take photographs, use a video camera, take samples, and to use other reasonable techniques. You should also take pictures and samples as near to those of the Compliance Officer as possible.

TAKE NOTES: It is imperative that you take as complete a set of notes as possible, identifying areas visited, equipment and material examined, Employees interviewed and a written description of each ALLEGED hazard. There is nothing wrong with taking notes during the investigation. On top of all notes you take, handwrite the following: "Confidential Attorney Work Product - Made in Anticipation of Litigation."

Representatives Authorized by Employees

The OSHA statute provides the right for an employee representative to accompany the Compliance Officer. This person is often the project Supervisor, an appointed steward or union safety representative. The statute further provides, in the absence of an authorized employee representative, the Compliance Officer "shall consult with a reasonable number of employees concerning matters of safety and health in the workplace."

Post-Inspection Procedures

A. The "Closing Conference"

After an Inspector completes the inspection, a closing conference is conducted with the employer representative. The inspector is also to informally advise you of any apparent violation. This closing conference is important; do not agree that you violated the act or any standards during the closing conference. Any admission of violation of the OSHA Act will be noted by the Compliance Officer and can be used against the company at a later date.

If the Inspector believes a violation may have occurred, s/he may tell you that s/he does not know if you will be cited for "such and such" conditions, but s/he will ask how long it will take to correct those same conditions. You're agreeing to have alleged unsafe condition(s) corrected within a certain time period becomes your abatement period, assuming you receive a citation.

The employer has a say in deciding on an abatement date. The Inspector does not set it alone. The Inspector should ask, "When can you have it corrected?" It

is up to the employer to insist on an adequate abatement period. If the condition to be corrected is a very minor one and will not be a problem to correct, and if the employer recognizes that it is an unsafe condition, then agree to an early abatement period (i.e., immediate or one day after receipt of citation). If you question the Inspector's reasoning and you feel you are, in fact, in compliance or know that a certain amount of time would be necessary to correct the alleged unsafe condition, then deny a violation and insist on a longer abatement date, usually 15 to 20 days. Remember that the abatement date becomes effective upon receipt of the Safety Order (citation) from OSHA. Even with immediate abatement, the company has one day after the receipt of the citation in which to correct the alleged unsafe condition.

Employers generally receive a Safety Order (citation) about ten (10) to fifteen (15) working days after an inspection, but OSHA has up to six (6) months to issue an employer a citation. It takes this long for an Inspector to write up his/her report, send it in, and have it go through all the administrative channels. If we wait to see what we will be cited on and we agree to an immediate or one-day abatement, then we may not have time to make the correction. Failing to correct within the time allowed may subject us to a maximum penalty of \$7,000 a day for failure to abate.

After the inspection process is over and a citation has been issued, make sure you correct cited violations that you decide not to contest. Re-inspections are becoming more prevalent, due to Federal pressures.

B. Items you may want to point out to the Inspector:

- Copies of the Safety Task Analysis
- Copies of Jobsite Safety meeting minutes
- Copies of "Weekly Safety Meetings" or other employee training material
- Copies of "safety warnings to individuals, subs, and trade contractors"
- Any other material that would help establish "good faith compliance efforts."

C. Written Records

If the project is cited for alleged violations, make a written report to the Safety Director immediately following the closing conference. This report should provide as much detail as possible. For instance, location of alleged violation; what actually was occurring at the time of inspection relating to the alleged violation; and what sort of investigation techniques or documentation were used by the Inspector.

D. If the Project is cited for alleged violation, note the following items:

The company will receive by mail a Safety Order (citation) with a cover letter stating posting requirements. If these are sent to the main office, the Safety Director will see to the compliance of all Safety Order requirements. However, if it is determined after review with all concerned, that the company should contest, the Safety Director will take the correct steps to do so.

If the Safety Order is sent to the jobsite, it should be forwarded to the Safety Director at the main office it may be expedited.

E. Imminent Danger

If the Compliance Officer concludes that conditions or practices exist that could reasonably be expected to cause death or serious physical harm before the danger can be eliminated, s/he shall inform the employer or a representative of the company and attempt to get the employer to voluntarily abate the danger. When the danger can be immediately abated without great expense or shutting down the job, we should do so immediately. However, the Compliance Officer has no authority to shut down the job without a court order. S/he can often obtain such an order, however, in a matter of a few hours.

If we decide that we cannot abate the danger without a court order, a Compliance Officer can only leave and report to his office that s/he is recommending a civil action to restrain or remove the condition.

F. Serious - Non-serious

A Safety Order for violation of a standard is either deemed serious or non-serious. If it is non-serious, no penalty is assessed unless ten or more violations were charged. In this event, penalties from \$420 to \$2,100 may be assessed for each non-serious violation. Penalties for serious violations begin at \$4,550 and go as high as \$7,000.

Read the Safety Order carefully. Note especially the date by which alleged violations are to be corrected. If you do not contest a particular violation, it must be corrected by the date so indicated. Failure to correct puts us in a position of "Failure to Abate," which fines may be assessed up to \$7,000 per day for up to ten days, the maximum fine being \$70,000.

G. Contesting Citations

From the day we receive the Safety Order at the jobsite or office, we have fifteen (15) working days in which to contest. We may contest whether the violation occurred, its gravity (serious or non-serious), the amount of the penalty, the abatement period, or any combination thereof. If fifteen (15) working days elapse and no contest has been filed by us, the Safety Order becomes final and binding. We must then pay any assessed penalties and correct all alleged violations.

H. Informal Hearings

During the fifteen (15) working day period in which we may contest a Safety Order, we may request an informal hearing. However, this request does not extend the 15 working day period while seeking judicial review.

OSHA Inspection Questionnaire

The questionnaire is to be completed immediately following the OSHA Inspector's departure and returned to the Safety Department. The purpose of the questionnaire is to help our company respond to OSHA's request and charges, and it is in the

employee's interest to fully complete the questionnaire. A copy of the OSHA Inspection Questionnaire is attached at the end of this section.

Outside parties NOT with the Department of Labor

If the Inspector brings another person who is neither a compliance officer, nor an authorized employee representative to participate in the inspection, you should carefully question this person to determine why s/he is present.

The best rule to follow is one of reasonableness and common sense. If the person is an equipment expert, and s/he is otherwise a disinterested party to the investigation, you may choose to let him/her participate. If, on the other hand, you feel the person's presence will be of questionable value concerning matters of safety and health in the workplace, then you may politely ask the outside party to wait until the Safety Manager or another designated company representative can be consulted.

OSHA INSPECTION QUESTIONNAIRE

“Confidential Progressive
Environmental and Safety Work Product - Made in Anticipation of Litigation.”
(Also, include this phrase at the top of any notes taken.)

1. Jobsite: _____ Job #: _____

Date of Inspection: _____ Time: _____

Name of Compliance Officer: _____

Office Address of Compliance Officer: _____

Your Name: _____

2. Opening Conference: Date: _____ Time: _____

Persons in attendance and company affiliation:

1) _____

2) _____

3) _____

4) _____

3. Did you attempt to contact the Safety Department? Yes _____ No _____

What was the result? _____

4. Did the Compliance Officer have a search warrant? Yes _____ No _____

Was the inspection based on an employee complaint? Yes _____ No _____

If yes, what was the complaint relating to? _____

5. How long did the inspection take? _____

6. Were there any photographs, videos, or samples taken? (monitoring of air/noise or other substance) Yes _____ No _____

Details: _____

7. Were you advised of any apparent violations? Yes _____ No _____

8. Did the Compliance Officer state that a citation would be issued. Yes _____ No _____

9. List the specific standard number(s) that was stated by the Compliance Officer:

- 1) _____
- 2) _____
- 3) _____
- 4) _____

10. Other problems that were noticed by you but not by the Compliance Officer:

- 1) _____
- 2) _____
- 3) _____
- 4) _____

11. Your general comments about the inspection and the Compliance Officer: _____

12. Closing Conference Date: _____ Time: _____

Persons in attendance and company affiliation:

- 1) _____
- 2) _____
- 3) _____
- 4) _____

WORKERS' COMPENSATION 2.F

1. Superintendents must complete the "**Superintendent's Report of Injury/Illness**" which is found in the appendix section of this manual, IMMEDIATELY after a jobsite injury, whether the injured person is a company employee, an employee of a subcontractor, or a visitor. **Report injury immediately to office** (Project Manager, and Payroll Resource Director).
2. The Payroll Director should submit a "**First Report of Injury**" to the local insurance office, with copies to the Project Manager if a company employee is involved.
3. All injury related correspondence must be sent to the local insurance office with copies sent to the Administrator. **CORPORATE SAFETY NEEDS COMPLETE INFORMATION ON RESTRICTED DUTY CASES - SPECIFICALLY THE RETURN TO WORK DATE, THE DEGREE OF RESTRICTION, AND THE DATE RESTRICTIONS ARE REMOVED. See the Section – Transitional Work Program, listed below regarding restricted duty work.**
4. DEATHS or serious injuries shall be reported IMMEDIATELY to the Administrator and to the Project Manager, and OSHA must be contacted within 8 hours of occurrence if a fatality or injuries to 3 or more MCPHERSON CONTRACTORS Employees that require hospitalization from 1 accident.
5. Superintendents should contact an injured employee on the first day of absence after a work-related injury and every three (3) days thereafter to convey the company's concern and to encourage the employee to return to work.
6. Never allow an employee to return to work after a lost-time injury without a Doctor's written permission, and a copy is placed on file.
7. Never allow an employee to exceed a Doctor's work restrictions, and contact the Project Manager if restrictions become difficult to avoid Lost Time Days.
8. Report immediately to the Project Manager any employee who is absent for the second time (after having once returned) due to a work injury.
9. Please be sure to use the medical provider specified by the Insurance Company.

<p>Transitional Work Program Restricted Duty Procedures</p>

A. Program Goals

1. To protect the health and safety of all employees.
2. To prevent lost time accidents.
3. To return injured employee in a timely and safe manner.

B. Criteria for Entry

1. If an employee is injured on the job and the injury prevents the employee from performing the full range of responsibilities for an undetermined, but temporary period of time.
2. Employee must accept the position that is offered by MCPHERSON CONTRACTORS. Employee does have the right to refuse the position or work. If refused, no other positions or work will be made available for their employment until they are released back to full work duty by the doctor or physician.

C. Determined Work Capabilities or Restrictions

Each employee must have a statement from their attending physician or doctor defining the restrictions to be followed and the estimated length of time they may effect.

D. Employee General Information

1. All time must be recorded as light duty.
2. Wages may be adjusted in the case of extended light duty in the work, with benefits based on hours worked.
3. If further medical treatments or appointments are not available during non-working hours, the job Superintendent is authorized to approve pay for working hours lost, obtaining such treatments on a case by case basis, upon submission of confirming evidence.
4. Employees entering this program are expected to be productive at all times in their modified duty assignments and perform equal to that of their co-workers.
5. Employees in this program will not be assigned to duties involving scheduled overtime work.

TRAINING 2.G

- A. Site-Specific Training** - All employees will be briefed on their safety responsibilities, safe work practices, and company safety policy when they arrive on the job.

Specific duties include:

1. The project manager will explain company safety policy to the Superintendent. The Superintendent is expected to abide by and enforce company safety policies. This explanation includes:
 - a. Reviewing this safety manual.
 - b. Reviewing any special hazards of the project and provisions for special training and equipment.
 - c. Reviewing the subcontractors' safety records and policies.
2. The Superintendent will explain corporate safety policies to each foreman. This explanation will include:
 - a. Briefing on the company safety manual.
 - b. Reviewing emergency and medical procedures.
 - c. Discussing special safety hazards on the job.
 - d. Instructing them on accident reporting procedures.
 - e. Reviewing training methods and procedures, stressing the foreman's responsibility for the safety of the crew.
 - f. Reviewing corporate procedures for safety policy enforcement.
3. The foremen will explain company safety policy to their crews. This explanation will include:
 - a. Explaining the company's concern for safety and our procedures for safety policy enforcement
 - b. Discussing specific tasks and explaining step-by-step, how to do each part safely.

- B. New Hire Safety Orientation** – See Section 2.d, Number 5 for New Hire Training Criteria, located in this manual.

C. Training Procedure - A simple, basic format for successful training follows:

EXPLAIN what has to be done.
DEMONSTRATE what has to be done.
WATCH EMPLOYEE do it.
REPEAT if necessary.

Remember that each individual learns at a different speed. Our job is to be sure that the training works regardless of language barriers, personal factors, or other problems.

D. Training Assistance - The Project Manager is always ready and willing to help with training. All it takes is a phone call when you want help from outside agencies, training materials, or personal assistance.

MEETINGS 2.H

Management and employees working together can identify, understand, and correct unsafe working conditions. Safety is an important aspect of good workmanship and should be included in all meetings concerned with the work. In addition to this, safety will be specifically discussed at the following:

- A. **Weekly Subcontractor Coordination Meetings** - The Superintendent uses these meetings to discuss current conditions and to coordinate the subcontractor's work. These meetings can be a good forum for discussing site safety conditions and concerns. Records of safety related discussion should be made and forwarded to the Project Manager.
- B. **Monthly Safety Meetings** - The Superintendent should hold monthly safety meetings and require all jobsite personnel to attend, and sign-in for jobsite records. Outside assistance like the Project Manager, OSHA, or vendors can be used to cover the subject matter. After each meeting the Superintendent should prepare minutes and distribute copies to all subcontractors and the Project Manager.
- C. **"Toolbox" Safety Meetings** - Superintendents will conduct a short safety meeting with their crews each week. After each meeting the Superintendent should complete the **"Safety Meeting Report"** and have all in attendance sign the report. The original report should be kept on file at the project site and a copy sent to the Project Manager.

The following guidelines for these meetings should be followed.

1. Keep the meeting moving fast.
2. Start and stop on time.
3. Use illustrated materials and demonstrations.

4. Cover one topic at a time and do it well.
5. Try to get everyone involved.
6. Review any recent injuries.
 - a. What was the injury?
 - b. How did it happen?
 - c. How can it be prevented next time?
7. Review safety hazards seen the past week.
 - a. What was the hazard?
 - b. Why was it dangerous?
 - c. How has it been handled and abated?
8. Review the work plans for the coming week.
 - a. What will the hazards be?
 - b. Who will be affected?
 - c. How will they be handled?

ACCIDENT INVESTIGATION 2.1

Every accident, whether it involves company employees or those of subcontractors, must be investigated thoroughly. The Superintendent will investigate all accidents, as soon after they occur as possible, following these steps.

1. Notify the Project Manager and Vice President immediately if serious.
2. Interview and make a record of the statements of the injured employee, the employee's supervisor, and any witnesses. The Superintendent's observations should also be recorded. Weather conditions, time of day, condition of site, and equipment, personal factors, and other observations should be discussed in these interviews. If the media arrives, inform them that Management has been contacted, and the appropriate spokesperson is in route. Tell all employees not to offer information about the jobsite or accident.
3. Complete the "**Supervisor's Accident Report**" which is located in the appendix section of this manual, or applicable insurance company accident report (i.e. auto, liability, etc.) being sure to answer all items. The information below (See #5 – Pointers) can be used to help describe the situation on the "Supervisor's Report."

4. Photograph the accident site, any equipment involved, and the general condition of the job. If a video camera is needed, please contact the Project Manager.

5. **POINTERS FOR ACCIDENT INVESTIGATION**

Purpose

- a. To find out **how** the accident happened
- b. To find out **why** it happened
- c. To **prevent** its happening again

Ask Yourself

- a. What **object** or substance caused the damage?
(such as a hard chisel)
- b. What **part of the object** did the damage?
(such as the cutting edge)
- c. What **kind** of accident was it?
(such as being struck by the chisel)
- d. What was the **unsafe** mechanical or physical **condition**?
(such as a dull edge)
- e. What was the **unsafe act**?
(such as not grasping the chisel firmly)
- f. What was the unsafe **personal factor**?
(such as lack of skill)

The Investigation

- a. **MAKE HASTE - Investigate all accidents.** Minor accidents will not require the detailed investigation of the serious cases. However, the longer you delay, the more difficult it will be to get the information.
- b. **INVESTIGATE FOR PREVENTION - The primary objective of an accident investigation is to find a way to prevent its happening again.** Keep this objective firmly in mind and do not allow yourself to get distracted over other issues.

- c. INVESTIGATE AT THE ACCIDENT SCENE - Take careful notes and **investigate the scene** before you talk to the injured employee or witness. Attempt to reconstruct how the accident actually happened. List any unusual occurrences, out-of-place objects, or missing safeguards.
- d. GET THE FACTS - All of them, not just those that fit into your preconceived ideas of what happened. An investigation that produces **all the facts** makes it highly likely that your evaluation of them will be accurate and acceptable.
- e. PLAN AND PREPARE FOR YOUR INTERVIEW - The more facts you have at your disposal, the clearer your idea will be of what you are trying to discover. Your **objective is to keep an open mind and conduct an impartial investigation**. Therefore, if you give the person you are planning to interview a short rundown on the facts you have in hand, he or she will probably give truthful replies to your questions.
- f. LET THE VICTIM TELL HIS OR HER STORY - It's usually best to interview the accident victim fairly soon after the accident; you are more likely to get truthful answers to your questions. **Put victims and witnesses at ease and you will get the answers you need.**

SUBCONTRACTORS 2.J

Our company and our subcontractors build each project as a team. Each team member must do their part for the team to succeed.

The following safety requirements apply to all subcontractors:

1. Subcontractors will be required to comply with corporate safety standards and all applicable local, state, and federal safety, health, environmental, or jobsite specific regulations.
2. The Project Manager should consider the safety experience of subcontractors when awarding contracts. The project manager will explain to each subcontractor that his contract is contingent upon his conformance to company safety standards.
3. Subcontractors will be instructed to correct unsafe conditions for which they are responsible. If the corrections are not made promptly, the Superintendent will have them corrected and back charge the responsible subcontractor.

4. The Superintendent has authority to direct subcontractors to remove subcontractor personnel from the site for violations of company safety policies.