SUBURBAN
CONSTRUCTION MANAGEMENT

Corporate Safety Program

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FIRST LINK SAFETY
A Risk Management Company

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CONSTRUCTION MANAGEMENT

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Suburban Construction Management

Safety Policy Manual

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Suburban Construction Management

SAFETY POLICY STATEMENT

It is the policy of Suburban Construction Management to provide and maintain a safe and healthy work environment for all its personnel and subcontractors.

To achieve this goal, every reasonable effort shall be made to utilize the principles of accident and loss prevention in the management of all activities and programs.

Specifically, it is our management's responsibility to identify, control and/or eliminate known hazards which can result in personal injury or illness, property damage, fire, breach of security, negative environmental impact or any other form of controllable loss.

All personnel are ultimately responsible for their own safety by complying with legislative, company and industry standards, as well as by promptly reporting all unsafe acts or conditions to supervisors. Supervisors are responsible for taking immediate action to solve such problems.

The success of our safety and loss prevention program requires the dedication, commitment, involvement and participation of all personnel working together to achieve this common goal.

Signature of Andrew DiPietro:

SAFETY GOALS

The safety goals of Suburban Construction Management are structured around the following principals:

A. All injuries can be prevented.
B. All employees have the responsibility for preventing personal injury.
C. It is possible to safeguard all exposures that may result in injury.
D. It is necessary to train all employees to work safely and to understand that it is to their advantage, as well as the company's, to work safely and that they have a definite responsibility to do so.
E. It is good business from the standpoint of both efficiency and economy to prevent injuries on the job and off the job.
F. Safety is an equal partner with production, cost, and quality of work.

SAFETY OBJECTIVES

The objectives of this policy are as follows:

A. To provide safe and healthy working conditions to the maximum extent possible.
B. To achieve the lowest possible number of injuries at all company project locations.
C. To develop in personnel a recognition that:
    - The prevention of injuries is significant and important to the accomplishment of corporate safety goals.
    - Safety performance of each operation will be considered, along with other criteria, when management and Superintendent Performance evaluations are made.
    - Employee accidents add directly to company costs, whether on-the-job (worker's compensation) or off-the-job (group insurance plans, sick pay benefits, etc.); and the same is true of accidents involving employees' dependents covered under the insurance plan.
D. To carry out the company's obligations under federal state, and local safety and health laws and regulations.
E. To achieve the lowest possible level of off-the-job injuries.

POLICY PURPOSE AND SCOPE

A. To assign responsibilities and accountabilities for managing the Corporate Safety Program.
B. To assign individual accountability to corporate staff, project management, Superintendents and employees.

C. To set forth the Company policy on safety and standard procedures that will be practiced by all employees. These procedures will be directed toward the common goal of preventing personal injury as well as equipment/property damage.

RESPONSIBILITY AND ACCOUNTABILITY

Corporate Management's Responsibility

In order to achieve the objective of maintaining a safe workplace for all employees, the President, Vice-President, and Project Managers must participate by initiating the Corporate Safety Program and giving their full support to the Program. Corporate management supports the Corporate Safety Program as follows:

A. Ensure all company operations comply with the Corporate Safety Program through monitoring and accountability of Project Managers and Superintendents.
B. Assist in communicating the importance of adhering to the Corporate Safety Program through consistent support and monitoring of the projects.
C. Actively demonstrate commitment to the safety and health of all employees and express support for the Corporate Safety Program. This will be accomplished by the adherence to the Corporate Safety Program.
D. Ensure Superintendents are provided with the necessary resources, training, budget, and other proven loss control tools to effectively administer a pro-active Corporate Safety Program.
E. Formally recognize Superintendents progress in providing a pro-active Corporate Safety Program through awards, letters of commendation, and other positive efforts.

Superintendent Responsibilities

At the project level, the primary responsibility for safety and the Corporate Safety Program and its results is that of the Superintendent. His responsibility is to ensure all policies contained within the Corporate Safety Program are carried out operationally. These policies will be implemented through direct managerial support. Superintendents will be accountable for the following:

A. Ensure all employees follow the policies of the Corporate Safety Program. Employees violating **ANY** safety policy or procedures may be subject to discipline. **(Appendix 1 and 2).**
B. Provide guidance and resources to Foreman and Field employees for the implementation and maintenance of a pro-active Corporate Safety Program.
C. Ensure that the Foreman fulfills his/her responsibilities for accident prevention outlined in Foreman responsibilities.
D. Ensure, through proper planning and execution, all projects are given a hazard analysis before a task begins. Results of the hazard analysis will be made known to all corporate management for input on how to mitigate the hazards. Ensure all agreed-to mitigation techniques will be implemented. **(Appendix 3)**
E. All hazard analysis training will be documented as to content and those in attendance. Copies will be kept on site and at the corporate office.

F. Ensure Foreman is provided with the necessary resources, training, and other loss control tools to effectively administer a pro-active Corporate Safety Program. This will be accomplished by utilizing corporate safety resources, **First Link Safety Services**, seminars as well as other pro-active safety training.
G. Actively demonstrate their commitment towards the safety and health of all employees and express support for the Corporate Safety Program. This will be accomplished by demonstrating follow through and feedback to the employees on all safety issues brought to their attention.

Superintendent and Foreman Responsibilities

A. Ensure employees follow the company safety policies and procedures. Employees violating any safety policy or procedure will be disciplined and/or discharged depending on circumstances. **(Appendix 1 & 2).**
B. Provide all new employees with a thorough, documentable orientation utilizing a standard safety orientation checklist. A follow-up safety orientation must be completed at regular intervals after initial orientation.
C. Inform the corporate headquarters of all accidents as soon as possible. Investigate all accidents, complete accident investigation reports and ensure proper corrective action has been taken, all within the shift the accident occurred. Forward all Accident Investigation Reports to corporate office within 24 hours.
D. Observe employee work procedures and correct unsafe practices when found. Corrective action will be documented and kept in the employees work file at the corporate office.
E. Instruct employees in proper job safety procedures. Document the training, and include it in the employee's work file at the corporate office.
F. Ensure identified unsafe conditions are corrected immediately. Actions taken will be documented and included in the project files.
G. Conduct and document toolbox safety meetings at least every week with all operations employees. Topics covered in the meeting and its attendants will be included in the project documents and sent to the corporate office. These meetings shall be uploaded to Submittal Exchange or Procore.
H. Stimulate and motivate employees to work in a safe manner through aggressive, documented training and re-training on safe work practices.

Employee Responsibilities (Appendix 4)

A. Employees will accept the established Corporate Safety Program as part of their responsibility to eliminate accidents. They should utilize all loss control measures, observing safe work practices, using proper safety devices, using personal protective equipment as required, and making prompt reports to their immediate Superintendent at the occurrence of each industrial injury or occupational illness.
B. Employees have a responsibility to encourage fellow workers to work safely and to report existing or potential hazards as they are recognized.

SUB-CONTRACTORS RESPONSIBILITY

The Subcontractor is required to:

A. Adhere to and comply with Suburban Construction Management policies and procedures, state and local regulations, and applicable provisions of CFR 29 Chapter XVII - Occupational Safety and Health Administration part 1926 "Safety and Health Regulations for Construction.

B. The sub-contractor is required to instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her work environment, as well as control or eliminate any hazards or other exposure to illness or injury.

C. The following violations are grounds for **IMMEDIATE REMOVAL** of subcontractor's personnel from a job site.
    1. Disregard of safety and health rules and regulations, repeated violations or refusal to follow safety and health regulations.
    2. Fighting (physical contact), horseplay or gambling.
    3. Theft.
    4. Drugs or alcohol (possession or under the influence).
    5. Willful destruction of property.
    6. Possession of firearms or explosives.
    7. Any act or omission that could inflict or result in bodily harm or death.

D. Subcontractors will conduct a weekly safety meeting with their personnel if they do not attend the Suburban Construction Management weekly safety meeting. A copy of the written minutes and attendance of each meeting will be given to the designated Suburban Construction Management representative.

E. When necessary, the subcontractor will complete a hazard analysis form and returns it to the project Superintendent prior to commencing that portion of work. **(Appendix 3)**

When required by Suburban Construction Management and CFR 29 1926, a copy of any certification, designed by engineer, proof of certification, or proof of competent person will be submitted to the Suburban Construction Management representative.

Subcontractors Pre-Construction Meeting

A pre-construction safety meeting will be held before a subcontractor and its lower tier subcontractors begin work. This meeting will be held with the designated Suburban Construction Management project representative and the contractor's key site representative, such as the job Superintendent and job foreman. Discussion will center on the project safety manual and requirements. It is at this time that the subcontractor will present:

1. A copy of the company written safety program.
2. A copy of the company written hazardous communication program.
3. Name of the contractor's on-site safety coordinator.

4. Name of the competent person when required by federal and state regulations, i.e. excavations and scaffolding.
5. Copy of crane annual inspection. (If applicable)
6. Copy of SDS for all materials that will be used on the project.

7. Proof of qualification for operators, i.e. dozers, cranes, and as required by federal, state and local laws.
8. Any additional items as required by contract documents.
9. Job hazard analysis.
10. Copy of certified drawing, i.e. scaffolding and excavation shoring. (If applicable)
11. Equipment and safety certifications.

Subcontractor Safety Violation Notification (Appendix 5 & 6)

If a Suburban Construction Management representative notifies the subcontractor or its lower tier subcontractor of any non-compliance with the Suburban Construction Management and/or OSHA safety regulations, the subcontractor will immediately correct the deficient conditions. If the contractor fails to comply promptly with the directive, the Suburban Construction Management representative may stop all or any part of the work of the subcontractor. In this event, when satisfactory corrective action is taken by the subcontractor, a start order will be issued by the Suburban Construction Management representative. No part of the time lost due to any safety violation is subject to claim of extension of time or for excess costs or damage by the subcontractor or its lower tier subcontractor.

For serious or repeat violations not corrected within 2 working days, Suburban Construction Management can perform or cause to be performed the necessary work and back-charge the contractor who is in non-compliance.

Contractors are required to discipline and/or remove from the work site employees who violate established rules and regulations.

Site Safety Inspection (Appendix 7)

A Suburban Construction Management representative (Superintendent or designated person) will conduct regular inspections of the job-site. Each sub-contractor will also conduct frequent and regular inspection of his/her work area to assure that safety requirements and practices are being enforced.

This inspection includes, as a minimum:

1. Site conditions.
2. Tools.
3. Materials.
4. Equipment.
5. Any areas that may compromise the safety of individuals or property.

Discussion of all safety deficiencies and corrective action will be noted at the site safety and coordination meeting.

EMPLOYEE SAFETY ORIENTATION (Appendix 8)

Federal and State laws require employers to provide to each employee information and training necessary to safely complete his/her job assignment. As part of the employee orientation, it is the responsibility of the Superintendent to see that the safety checklist is completed for each new employee.

A. Company Safety Rules (Appendix 4)
All new employees will receive a copy of the company safety rules on their first date of employment.

B. Project Orientation
A project tour will be given in order to identify areas of danger, hazardous materials and location of exits, fire extinguishers and first aid facilities.

C. Emergency Procedures (Appendix 9)
Instruction will be given on specific actions to take in the event of an emergency. This will include where to go and what to do.

D. First Aid/Medical Treatment Procedures
The new employee will be instructed to notify his/her immediate Superintendent when an accident occurs and to contact the emergency unit by calling the appropriate posted number. Employees will be briefed on each job site as to the appropriate emergency number.

E. Reporting Injury, Illness, Unsafe Act or Condition
Instruction will be given as to how, where and when to report injuries and unsafe conditions or practices.

F. Personal Protective Equipment (Appendix 7.1)
If personal protective equipment is required for the new employee's job assignment, it will be issued to the employee by the Superintendent or department manager and specific training will be given on use and care.

G. Job Safety Procedures
The Superintendent will instruct the new employee in correct job safety procedures. This training will be consistent with the Standard Operating Procedures (SOP's) for the specific task.

Superintendents will emphasize the need for greater safety awareness and provide timely safety training, holding safety meetings with their employees and distributing safety related information.

SAFETY TRAINING/EDUCATION PROGRAM

A. Company's Responsibility
In order to provide a safe work environment, Suburban Construction Management is committed to providing adequate and appropriate safety training and education to its employees. Suburban Construction Management

provides a Safety Orientation Program and ongoing education to keep employees well informed of the safest and most efficient work practices for each respective work area. The safety training programs mainly emphasize accident/injury prevention in various phases of operation.

Safety training and education programs include fire extinguisher use, first aid & CPR training, hazardous materials (where applicable), fall protection, confined space entry, personal protective equipment, and Lock out Tag out.

In addition, the corporate management staff will provide resources as necessary for use by the Superintendents in the management of their respective safety challenges.

B. Superintendent's Responsibility

The Superintendent is responsible to provide a safety orientation to each new employee on how to perform each work task in a safe and efficient manner. The orientation will include the use and care of personal protective equipment, emergency procedures, location of first aid equipment, location of material safety data sheets, and the proper use of hazardous materials (where applicable).

PROJECT SAFETY MEETINGS (Tool Box Safety Meetings)

Superintendents will emphasize the need for greater safety awareness and provide timely safety training by holding safety meetings with their employees and distributing safety related information whenever it is reasonably achievable.

Safety meetings will be held for operations employees at least weekly and a relevant safety subject will be discussed. These meetings will be a minimum of ten minutes and will allow for questions and answers. The meetings will present the opportunity for all members to address safety problems and issues. Documentation, of attendees and subject matter, for each meeting must be turned into the office to be reviewed monthly and will be kept on file for three years.

These meetings will also unveil information on any new hazards or processes introduced into the project that have the potential to effect safety and health of the employees.

CELL PHONE POLICY

If an employee must use a cell phone while driving a company vehicle, the following guidelines must be followed:

- Always use a hands-free phone. Never talk while driving with the phone held to your ear in one hand.
- Never dial while you are driving, always dial while the vehicle isn't moving.
- Never use the phone in heavy traffic or bad weather.
- Always let your voice mail pick up your calls in tricky driving situations and retrieve your messages later on.
- Never look up phone numbers while driving.
- Do not attempt to read or take notes while the vehicle is moving.
- Do not have stressful conversations while driving.
- Know when to stop talking. Keep conversations brief so you can concentrate on your driving. If a long discussion is required, if the topic is stressful and emotional, or if driving becomes hazardous, end your call immediately and continue the conversation when you are not driving a vehicle.
- Keep your eyes on the road while on the phone.
- Keep Your Hands on the Wheel. Buckle your seatbelt and place both hands on the steering wheel. Wrap them firmly around it, positioned at "10 and 2 o'clock" and keep them there while you drive.
- Stay in your lane. Don't get so wrapped up in a conversation that you drift into the other lane. Pull into the right-hand lane while talking, so that you only have to worry about traffic to the left.

STRETCH AND FLEX SUGGESTIONS (OPTIONAL) (Appendix 24)

Why do we Stretch?
Daily stretching has many benefits including:

- Prepares body for physical work activities – it is a wakeup call for your muscles
- Flexibility is increased – not just at work but all the time
- Your circulation is promoted – your muscles need oxygen from the blood to operate at peak performance
- Muscle tension is decreased – a static position locks the tendons
- Relaxation is increased – gives your brain something else to concentrate on instead of normal work activities
- Your range of motion is improved – progressively strengthens muscles and lengthens your tendons, which means greater range of motion.
- Your body awareness is increased – keeps those muscles from sleeping on the job
- Muscle fatigue is delayed – removes lactic acid from the muscles which contributes to fatigue

- Reduces frequency and severity of injury – there are proven results from numerous studies
- Your team morale is increased – it is not a competition, it's team building, enjoy it and benefit from the results

Guidelines for beginning with your body in a neutral position:

- Standing relaxed with your feet shoulder-width apart, bend your knees a little and contract your abdomen a little. This will help keep your back straight. Your shoulders should be relaxed and your chest lifted.
- Hold each stretch for a count of 10 – 15 seconds
- Do not bounce while you are stretching.
- Breathe in a relaxed manner and don't hold your breath.
- Do the stretches at your own rate – don't compensate.
- Stretch just beyond the point of natural tension.
- Make stretching a daily habit, and do it before you start work and immediately after work.

Limitations

- Make sure you do these stretches at your own pace and ability, stretch only within your own limits.
- You should stretch to the point of comfortable tension, and then relax before you do the stretch.
- You should avoid straining while you are performing the stretches.
- None of these stretches should be painful.
- You should release the stretch slightly if your muscles begin to shake.
- If you experience any pain in the joint area, back off the stretch and make sure you are doing it correctly. If necessary, you should try another position or a different stretch for the target muscles.
- You should breathe slowly and rhythmically while holding these stretches. Don't hold your breath; it is important that oxygen is getting to the blood and muscles.

SAFETY COMMITTEE (Appendix 23)

Responsibilities

A. Implement and monitor company safety programs.
B. Review the safety performance of all operations of the respective departments, operations and projects.
C. Identify safety deficiencies and establish procedures to eliminate those deficiencies, including on site inspection programs.
D. Review and make recommendations to management regarding safety suggestions and/or recommendations from individual employees.
E. Review accidents and make recommendations for immediate prevention measures and control of hazards.

F. Analyze accident reports to determine:
   - Trends in frequency or severity of accidents that indicate a need for added safety education.
   - Problem areas or operations that need increased attention.
   - Analyze repeat offenders who may need additional training and supervision.

G. Evaluate accident investigations to determine if reported unsafe conditions and acts have been adequately identified and corrected.
   Meet monthly to discuss the reports described above. Information that is to be relayed to employees will be addressed in the weekly project safety meeting and will be posted on the safety bulletin board.

H. Coordinate emergency response and evacuation procedures.

Safety Committee Meeting

A. The safety committee will be composed of members selected by corporate management and corporate management representatives.
B. Employee representation duration on the committee will be determined by the committee.

Safety Committee Guidelines

A. Determine meeting time, place and posting location so that employees as well as members will be informed of upcoming meetings.
B. Maintain, distribute and post written minutes of safety meeting.
C. Maintain and post a current list of safety committee members by name and department. This list indicating dates of the committee member's term of tenure.

SITE-INSPECTION (Appendix 7)

Each project must be inspected by the Project Superintendent or his representative daily to ensure a safe environment and to maintain compliance with current local, State and Federal laws. The results of these inspections will be documented and will be placed in the project file. A recap of deficiencies found and corrections made will be forwarded to corporate office on a weekly basis for budget and training considerations.

During the course of the inspection, an unsafe act or condition may be recognized. If so, action will be immediately taken to eliminate the hazard.

FIRST AID, TRAINING, KITS AND SIGNS

A. All operations Superintendents will be trained in first aid and in CPR. If their duties require absence from the job-site then other persons will be designated for first aid.
B. Other persons may be trained and designated by management to surpass or augment the standard requirements.
C. First aid kits will be in accordance with the requirements of the General Safety and Health Standards of **Sub Part C of CFR 1926**. These units will be properly maintained and stocked.
D. Signs listing emergency numbers, procedures, etc., will be located next to each telephone.

POSTING POLICY (Appendix 10)

On each project there will be a bulletin board designated for safety related information. This board will include the following:

A. Employer/employee notification of workman's' compensation insurance.
B. Safety bulletins and posters.
C. Emergency telephone numbers.
D. Evacuation layout drawing.
E. Minutes of safety committee and safety department meetings.
F. Significant changes in operations affecting safety and health.

EMERGENCY PROCEDURES (Appendix 9)

In case of fire:

A. The first employee to notice a fire should activate the nearest alarm to alert all other people in the building, proceed to the nearest telephone and call the appropriate emergency number and, if possible, notify the nearest Superintendent about the location of the fire.
B. All employees should immediately evacuate the building according to the emergency plan located on the safety bulletin boards or as specified in the site-specific safety plan and proceed to a designated area so that all personnel may be accounted for. All employees should stay within their assigned area until informed to return to the building or to do otherwise.
C. If appropriate, Superintendents should turn off equipment and close all windows.
D. Drills will be conducted to reinforce the proper procedures for emergency evacuations. Facilities should be checked during self-inspections for hazards that will restrict quick responses to emergency situations. This checklist will include:
    1. Pathways to exits will remain unobstructed.
    2. No permanent locking of the exit doors except from the outside.
    3. Doors resembling exiting doors will be marked "NOT AN EXIT".
    4. Alarms will be checked for physical damage and operating condition.
    5. Illumination within the department and individual exiting lights will be bright enough to identify all exit pathways and doors.

ACCIDENT INVESTIGATION AND REPORTING (Appendix 11)

The applicable Suburban Construction Management Superintendent will be notified immediately when an accident has occurred. The first responsibility is to insure that first aid and medical treatment have been administered.

All accidents will be investigated. Pictures of accident site must be taken, by a qualified Suburban Construction Management representative, as soon as possible. The Suburban Construction Management Superintendent or designated person will be advised of the initial results of the investigation within 24 hours.

In addition, all subcontractors and lower tier subcontractors will forward to Suburban Construction Management's representative a copy of Suburban Construction Management's subcontractor injury report form or a copy of their own accident report.

Accident Report Procedures (SEE APPENDIX 12)

A. Injury and/or Illness

1. An employee involved in a work-related injury or illness will report it **immediately** to his/her Superintendent.
2. On notification of the injury or illness, the employee and Superintendent will complete an incident report and submit it to the corporate office within 24 hours.
3. If the injured worker requires medical treatment, the appropriate accident report form should be completely filled out.
4. The Superintendent will complete an accident investigation form and send this, along with signed copies of the appropriate accident form to the corporate office within the shift the accident occurred or when you were notified. Witness reports are required to be filled out and sent with the accident report form.
5. An OSHA 300 A Log, supplied by corporate management staff, will be posted by each project Superintendent at their job-site from 2/1/10 to 4/30/10.

B. Vehicular Accidents

1. An employee involved in a vehicular accident in the course of his/her employment must report the incident to his/her Superintendent immediately.
2. On notification of the accident, the employee's Superintendent should conduct a complete investigation immediately. Pictures**,** taken by a qualified Suburban Construction Management representative**,** of the accident site, are required.
3. The employee should complete a written statement describing the accident and the appropriate accident report form, if any injury or property damage was incurred.
4. The Superintendent will complete his/her portion of the accident report and return it within the day to the corporate office.
5. If the incident is a vehicular injury accident, Suburban Construction Management personnel will immediately go to the medical facility in which that person has been taken for treatment.
6. All vehicular accidents must be reported to the corporate office immediately.

ACCIDENT INVESTIGATION (SEE Appendix 11)

The purpose of an accident investigation is to discover and correct hazardous conditions and practices in order to provide a safe and productive work environment.

A. Procedure

When a vehicular and/or industrial accident occurs, the following information must be obtained.

1. Who was involved?
2. Exact location of the accident.
3. The exact date and time of the accident.
4. The sequences of events leading up to and involved in the accident.
5. Nature and extent of the injury.
6. What conditions, if any, attributed to the accident?
7. What unsafe act(s) or unsafe condition(s) contributed to the accident?
8. What was the underlying cause or causes of the accident?
9. Witness statements.

B. Accident and Investigation Reports

All vehicular and/or industrial accidents must be investigated and the proper reports must be completed and forwarded to the corporate office. A Superintendent investigation report must accompany all vehicular and/or industrial injury reports that are turned in to the corporate office.

C. Property Accidents

Accidents involving any vehicle, building and/or equipment must be investigated at the scene of the accident by the appropriate Superintendent as soon as possible. All accidents must be reported to the corporate office immediately.

D. Employee's Responsibility (Appendix 4)

The employee is responsible to immediately report an accident to his/her Superintendent and to fill out the employee portion of the industrial accident claim form(s) as soon as possible. The completed form(s) must be examined and verified by the appropriate Superintendent and forwarded to the corporate office.

RECORD KEEPING (Appendix 13)

Records will be kept for three years on all of the following:

A. Log of Occupational Injuries and Illnesses (OSHA 300).
B. All Accident Reports:
    1. Industrial injury
    2. Incident reports

A master file will be maintained by management containing the following:

A. Company policy and procedures covering safety, loss control, accident prevention and a safe, healthy work environment.
B. Minutes of all safety committee meetings three years on file.
C. Inspection reports for three years on file.

MODIFIED WORK POLICY

The purpose of the Suburban Construction Management Modified Work Program is to minimize the results of an injury for both the employee and the company.

"Modified work", means temporarily placing the employee in a working environment that would not cause a further aggravation of an injury or previously existing condition. Modified work is accomplished by working directly with the employee, their supervisor and treating physician. Employees and treating physicians must understand the Suburban Construction Management modified work program. This is the responsibility of the Project Superintendent and the Suburban Construction Management Insurance Coordinator.

The employee must notify his direct supervisor and Project Superintendent immediately of any injury or condition that would place him or her in jeopardy during normal work assignments. Failure to report any such condition may be grounds for termination of employment and denial of workers' compensation benefits.

If the employee is under a physician's care, the employee must report this to his or her direct supervisor and the Project Superintendent immediately. A copy of the treating physician's report listing specific work restrictions must be presented to the Project Superintendent. The Superintendent will then work with the employee and his direct supervisor to place the employee in a temporary modified work position that will not violate any restrictions listed by the treating physician.

Employees placed in a modified work assignment must inform their supervisor of any required physician visits that may occur during normal working hours. Otherwise, the

employee will be required to be on the project during normal working hours. Efforts will be made to keep the employee working on the project where the injury may have occurred. However, this may not be feasible in all cases. The employee may be required to report to another work location where a more suitable work environment can be developed.

Any employee placed on a modified work assignment will be evaluated on a weekly basis to monitor his or her recovery and ability to return to a regular work assignment. This will be the responsibility of the Project Superintendent, working in conjunction with the employee, treating physician, foreman, and the Suburban Construction Management Safety Department.

Subcontractors who have employees injured or placed in a modified work assignment as a result of an incident that occurred on a Suburban Construction Management Construction Project or has a pre-existing work restriction are required to provide weekly medical updates on the employee's condition to the Project Superintendent and Suburban Construction Management Corporate Management.

ALCOHOL AND DRUG ABUSE POLICY

In striving to maintain a safe, healthful and productive work environment Suburban Construction Management recognizes that it is not immune from the nationwide societal problem of alcohol and drug abuse. In order to limit the impact of alcohol and drug abuse on the company's workplace and employees, Suburban Construction Management has adopted this Alcohol and Drug Abuse Policy

Suburban Construction Management prohibits and will take disciplinary action up to and including discharge for the following:

1. The unauthorized use, possession, manufacturing, distribution, dispensation or sale of alcohol, drugs or drug paraphernalia on company premises, in company-supplied vehicles, or in any location while on company business. For the purpose of the Policy, "drugs" include marijuana, cocaine, opiates, PCP, amphetamines and any other controlled substances. Unauthorized possession includes possession on an employee's person, as well as storage in a locker, desk, company or personal vehicle, or any other repository on company premises or while on company business.

2. Performing any job duties under the influence of alcohol or drugs on company premises, in company-supplied vehicles, or in any location while on company business. An employee will be considered to be "under the influence" of alcohol or drugs if he or she exhibits recognizable symptoms of alcohol or drug abuse, including, but not limited to, slurred or inappropriate speech, dazed appearance, uneven gait, altered attention span, other symptoms or tests positive for the presence of alcohol or drugs.

3. The possession, use, manufacturing, distribution, dispensation or sale of alcohol or drugs off company premises that may adversely affect the individual's work performance, his or her own or other's safety at work or the company's reputation in the community.

4. Refusal or failure to follow reasonable instructions issued by a supervisor implementing this Policy.

Disciplinary action may also be imposed for the following:

1. Conviction under any criminal drug statute for a violation occurring in the workplace or in another location while on company business;
2. Conviction under any criminal drug statute under circumstances which adversely affect the company's reputation in the community;
3. Failure to notify the company of any conviction under any criminal drug statute within five days of the conviction.

Testing Policy

In connection with this policy, Suburban Construction Management has instituted a program to identify employees whose alcohol and drug abuse problems may affect the workplace and to prevent new employees from bringing their substance abuse problems to the workplace.

Applicant Testing

All new employees will be tested for the presence of certain controlled substances prior to hire. Any applicant who has a positive pre-employment drug test will be ineligible for employment.

For-Cause Testing

Whenever a supervisor believes that an employee's performance or workplace behavior may have been affected in any manner by alcohol or drug abuse, Suburban Construction Management may require that the employee submit a urine sample for drug testing and/or a breath or blood sample for alcohol testing. Any employee who tests positive will be considered in violation of this policy and may face discipline up to and including immediate termination.

Suburban Construction Management will utilize one or more certified alcohol or drug testing laboratories and collections sites to assure accurate and reliable results. At the applicant/employee's request and expense, a positive drug test result may be validated by retesting, at the same laboratory or a second testing laboratory, using the same sample.

Random Testing

All employees will be subject to random testing for the presence of illegal drugs. A random test is a test that is unannounced and results in every employee having an equal chance of being selected for testing at any given time. The random selection method used by the company will be determined in consultation with the drug testing agency and will be conducted in a computer-generated random selection method that ensures that all random testing will be accomplished in a completely arbitrary manner.

Post Accident Testing

Any employee who is involved in a work-related accident (as defined below) will be tested for the use of illegal drugs and alcohol as soon as possible after the accident.

Examples of an accident that will require an employee to take a drug and alcohol test include, but are not limited to, accidents that involve an employee and result in:

1. The death of a person.
2. Bodily injury to another person who requires medical treatment away from the scene of the accident.
3. An injury to the employee that may result in that employee filing a worker's compensation claim and whose lost time will likely exceed one working day; or,

4. Damage to property owned by the company or a third party that may reasonably be estimated to exceed $500.

An employee who is seriously injured and cannot provide a specimen for testing will be required to authorize the release of relevant hospital reports or other documentation that would indicate whether there were drugs or alcohol in their system at the time of the accident.

If it is determined by management that an employee's injury was definitely caused by an unsafe condition and that there was no unsafe act by the injured employee, the company reserves the right to waive post accident testing under these circumstances.

Employees who are involved in a work-related accident requiring medical attention are to inform their supervisor of the accident as soon as possible so that any needed drug or alcohol test may be promptly conducted in conjunction with their medical treatment.

Policy on Use of Prescription Drugs

Employees may possess and take medication prescribed for them by a licensed physician in accordance with the prescription. However, an employee taking any medication which may impair his or her physical or mental ability at work must report this fact to Suburban Construction Management, which, in its sole discretion, will determine whether and for how long the employee's job assignment should be changed. Employees should keep all prescribed medicine in its original container which is labeled with drug identity, date of prescription and name of doctor. Improper use of medication obtained through a prescription is a violation of this policy

Search Policy

1. In order to enforce the prohibition against illegal activity on company premises, Suburban Construction Management retains the right to inspect, without prior notice including the employee's work area, desk, tool box, locker, Suburban Construction Management vehicle, or other company property in the custody or control of the employee, as well as the employee's personal effects on company property, including personal vehicles. In addition, the company has the right to restrict or deny any employee access to any part of the company's premises at any time, without prior notice. Refusal to permit an inspection is a violation of this Policy, and may result in discipline up to and including termination.

SAFETY VIOLATION INSTRUCTIONS (Appendix 1 & 2)

SAFETY VIOLATION #1 - FIRST WARNING

1. The Safety Violation # 1 form is to be used as the initial warning for a safety violation.
2. The initial form is to be filled out with simple and clear definitions of the items that are not being done or are not in compliance according to the safety policy.
3. The yellow copy of this form is to be given to the employee that is responsible for the safety violation.
4. The white copy is to be forwarded to the Suburban Construction Management Corporate Office.
5. The violation form should reflect the date that the item in violation was previously discussed and proper procedures explained. If the employee was present the day of the training, their signature should be identified on the safety meeting sheet.
6. Supervisory personnel using the "Safety Violation" form for reasons determined inappropriate will be subject to disciplinary action.

SAFETY VIOLATION # 2 - THE SECOND AND FINAL WARNING!

(This form represents an employee's last chance).

1. Prior to issuance, all documentation of previous meetings, warnings, and safety information, including dates, times, proper signatures and procedures must be assembled.
2. The pink copy is to be given to the employee that is responsible for the safety violation.
3. The white copy is to be forwarded to the Suburban Construction Management Corporate Office.
4. It should be made clear to the employee that this is a final warning prior to disciplinary action up to and including termination.

OSHA INSPECTION POLICY (Appendix 14)

Suburban Construction Management considers its relation with OSHA a positive working relationship, both entities intent to eliminate occupational injuries. In this spirit of partnership, Suburban Construction Management has developed the following OSHA Inspection Policy.

A. Ask for his/her credentials. If the inspector does not object, make a copy of his/her identification card. If a copy can not be made, write down the inspector's I.D. number and name.
B. Ask the reason for the inspection.
C. Ask if there is a complaint. If the answer includes an employee complaint, request a copy.
D. Tell the inspector that you are not denying entry, but it is the company policy that you contact the company's corporate offices and the company's authorized representative (First Link Safety Services) prior to allowing entry.
E. A Suburban Construction Management designated person will escort the inspector all the time the inspector is on the job-site. Notes should be taken on everything the inspector notes or says. Photos should be taken of everything the inspector photographs, plus 2 photos from different angles. The escort will be the same person during the entire inspection.
F. The inspector has the right to interview any employee in private. Do not attempt to stop the interview, however the escort should ask the employee if the employee has any objection to the escort being present and listening to the interview. If the employee has no objections, the escort should attend the interview, listen and take notes.

   When the inspector has left the job-site, notify the corporate office and complete the OSHA INSPECTION FORM. Be specific, the more information the better. **(See Appendix 14)**

For information on the Multi Employer Citation Policy refer to this OSHA webpage:
http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=2024

CHEMICAL HAZARD COMMUNICATION PROGRAM (Appendix 15)

Company Policy

To ensure that information about the dangers of all hazardous chemicals, used by Suburban Construction Management, is known by all affected employees, the following Hazard Communication Training Program has been established:

All departments of the company will participate in the Hazard Communication Program. This written program will be available in the operations office for review by any interested employee.

Container Labeling

The Superintendent will designate personnel to verify that all containers received for company use will be clearly labeled as to the contents, note the appropriate hazard warning and list the name and address of the manufacturer.

The Superintendent will designate employees in each section to ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels that have the identity and the appropriate hazard warning.

Safety Data Sheets (SDS) (Appendix 15)

The Superintendent is responsible for establishing and monitoring the Company SDS program. They or their designee will make sure procedures are developed to obtain the necessary SDS and will review incoming SDS for new or significant health and safety information. They will see that any new information is passed on to affected employees.

Copies of SDS for all hazardous chemicals in use will be kept in the operations office. SDS will be available in a convenient location to all employees during each work shift. If an SDS is not available, immediately contact the Superintendent.

Employee Training and Information

The Superintendent is responsible for the company's employee safety training program. They will ensure that all program elements specified below are carried out.
Prior to starting work, each new employee of Suburban Construction Management will attend a health and safety orientation containing the following information and training:

- An overview of the requirements contained in the Hazard Communication Standard.
- Types of hazardous chemicals present in the job site.
- Physical and health risks of the hazardous chemical.
- The symptoms of overexposure.

- How to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment.
- Steps the company has taken to reduce or prevent exposure to hazardous chemicals.
- Procedures to follow if employees are overexposed to hazardous chemicals.
- How to read labels and review SDS to obtain hazard information.
- Location of the SDS file and written hazard communication program.

After completion of the training, each employee will sign a training acknowledgment receipt **(Appendix 16)** documenting the training received.

Hazardous Non-routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks. An example of non-routine tasks is a confined space entry in a trailer where there has been a large spill.

Prior to starting work on such projects, each employee will be given information by the Superintendent or designee about the hazardous chemicals he or she may encounter during such activity.

This information will include specific chemical hazards, protective and safety measures the employee can use, and steps the company is using to reduce the hazards, including ventilation, respirators, presence of another employee and emergency procedures.

Multi-employer workplaces

It is the responsibility of the Superintendent to provide employees of any other employer at the work-site copies of SDS (or make them available at a central location) for any hazardous chemicals that the other employer(s)' employee may be exposed to while working in conjunction with Suburban Construction Management. The Superintendent will also inform other employers of any precautionary measures that need to be taken to protect employees during normal operating conditions or in foreseeable emergencies and provide other employers with an explanation of the labeling system that is used at the work-site.

List of Hazardous Chemicals

The SDS book will contain a list of all known hazardous chemicals on an individual job site. This list must be updated whenever new hazardous chemicals are introduced into the workplace. A complete review by a member of management should be conducted once a year.

HOT WORK POLICY (Appendix 17)

Hot Work is any operation that requires an open flame or that generates enough heat to cause a fire. Individual owners may require a written policy and procedures to be followed prior to any Hot Work operation. Suburban Construction Management has developed its Hot Work policy to prevent fire in accordance with NFPA No 51B.

All Hot Work and the implementation of Suburban Construction Management policy is the responsibility of the individual Project Superintendent or his designated representative. A designated Suburban Construction Management representative will inspect the work area and confirm that the policy has been followed and that no fire hazards exist.

RESPIRATORY POLICY

The purpose of Suburban Construction Management Respiratory Policy and program is to ensure the protection of all employees from respiratory hazards. The responsibility of ensuring that the Respiratory Policy and program are followed is that of the Project Superintendent or his designated representative. **First Link Safety Services** will provide training and an equipment fit test for its employees as required prior to any respiratory operation. Subcontractors and their personnel will be required to provide to their own personnel respirators and training as needed.

Respirators are to be used **ONLY** when engineering, administrative, or work practice controls are not feasible, while engineering controls are being installed or in emergencies.

Respirators will be selected on basis of hazard to which the employee will be exposed. Only MSHA/NIOSH certified respirators will be selected and used. See **CFR 29-part 1926 Table E-4.**

The Corporate Safety Officer will be contacted prior to any selection or use of respirators. Respirators are to be the last line of defense.

The user of respirators will be instructed in the proper use and the limitations of respirators. The instructions will be given by a person who possesses knowledge of respirator use.

The user will receive as a minimum, the following instructions:

1. Proper fitting of respirators. (Test face-piece to face seal)
2. How to adjust the respirator.
3. Conditions that prevent a good face-piece to face seal:
    - Growth of beard.
    - Absence of one or both dentures.
    - A temple piece on eyeglasses
    - Skull caps that project under face-piece
    - Failure to follow manufacturer's face-piece fitting instructions.

Whenever possible, the respirator will be assigned to an individual employee for his/her exclusive use.

Respirators issued for the exclusive use of one worker will be cleaned after each day's use. For respirator used by more than one employee, the respirator will be thoroughly cleaned and disinfected after each use by each worker.

Respirator will be stored in a clean and sanitary location in a manner so the respirator will not be exposed to sunlight, dust, chemicals, excessive heat or cold, and moisture. The respirator will not be hung by its straps or stored inside gang boxes.

Respirators used routinely will be inspected for worn and damaged parts during the cleaning operation. Respirators used for emergency use will be inspected at least once a month and after each use.

Appropriate surveillance of the work area conditions and degree of employee exposure or stress will be maintained.

Regular inspection will be conducted while respirator operations are being performed to determine that proper use, inspection, cleaning, and storage of respirators are being met. No person will be assigned to a task requiring the use of a respirator until it has been determined that person is physically able to perform the task while using the respirator. A physician will determine that an employee is physically able to perform the task while using the respirator. A physician will determine that an employee is physically able to wear the respirator. The respirator user's medical status will be reviewed annually or as conditions warrant.

(Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator’s limitations.

2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.

3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

LEAD POLICY (Appendix 18)

Suburban Construction Management has developed a lead policy to comply with requirements set forth by OSHA.

If lead is encountered, or if lead is suspected to be present in a work area, the Project Superintendent will discontinue work in that area, and notify Suburban Construction Management corporate office. Suburban Construction Management and First Link Safety Services will then develop a site-specific written program to mitigate the lead exposure.

The responsibility for the enforcement of the site-specific written program procedures is that of the individual Project Superintendent.

BLOOD BORNE PATHOGENS POLICY (Appendix 19)

Suburban Construction Management has developed a Blood Borne Pathogens policy to eliminate or minimize employee occupational exposure to blood or certain other body fluids, comply with the OSHA Blood Borne Pathogens Standard CFR 1910 or applicable state or industry standards, and to ensure the safety of its employees.

As needed, individual site-specific programs will be developed for projects in which employees may have increased risk of exposure to blood borne infection. The responsibility of making that determination is that of Suburban Construction Management corporate office and **First Link Safety Services**. If a determination is made that an increased risk is present, a site-specific policy will be developed and the content of the policy will be followed.

The responsibility of ensuring that the site-specific policy is implemented and followed is that of the Project Superintendent.

CONFINED SPACE POLICY (Appendix 20)

Suburban Construction Management has developed a Confined Space Policy in accordance with the OSHA Confined Space Standard. The policy establishes uniform requirements to ensure that the hazards of confined spaces at Suburban Construction Management job sites are evaluated, safety procedures implemented, and that the proper hazard information is transmitted to all affected workers.

Suburban Construction Management Corporate Safety Officer is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The Corporate Safety Officer is the sole person(s) authorized to amend these instructions and is authorized to halt any operation of the company where there is danger of serious personal injury. The responsibility of the site-specific confined space program is that of the Project Superintendent. The Superintendent will have the authority to halt any operation of the company where there is danger of serious personal injury.

FALL PROTECTION POLICY (Refer to Technical Safety Requirements)

Suburban Construction Management considers fall protection a priority in ensuring the safety of its employees. Suburban Construction Management requires that all employees on a walking/working surface with an unprotected side or edge that is 6 feet or more above a lower level be protected from falling by the use of guardrail systems, personal fall arrest systems (PFAS), positioning devices, fall restraint systems, warning lines, or safety monitors (on approval of the Suburban Construction Management superintendent).

The responsibility of ensuring that all employees adhere to the 100% fall protection policy is that of the Project Superintendent. It is also the responsibility of the individual employee to follow the fall protection policy/plan and use all personal fall protection equipment according to OSHA requirements and the manufacturer's recommendations.

EXCAVATION POLICY (Refer to Technical Safety Requirements)

According to OSHA a trench is referred to as a narrow excavation made below the surface of the ground in which the depth is greater than the width, the width not exceeding 15 feet. An excavation is any man-made cut, cavity, trench, or depression in the earth's surface formed by earth removal.

Unguarded excavations are always hazardous and, whenever work is not actively in progress, they must be marked in a manner that will prevent any person from inadvertently walking into them. This task should be accomplished by its most practical means considering the population, terrain, and traffic of the area. It is the responsibility of all personnel involved in any operation to assure that all excavations are adequately marked.

Planning for Safety (Appendix 21)

Many on-the-job accidents are a direct result of inadequate initial planning. Correcting mistakes in shoring and/or sloping after work has begun slows down the operation, adds to the cost, and increases the possibility of an excavation failure. Suburban Construction Management will build safety into the pre-bid planning in the same way all other pre-bid factors are considered.

Before preparing a bid, these specific site conditions will be taken into account:

a. Traffic.
b. Location of structures and their conditions.
c. Soil.
d. Surface and groundwater.
e. Water table.
f. Overhead and underground utilities.
g. Weather.

These and other conditions will be determined by job site studies, observations, test borings for soil type or conditions, and consultations with local officials and utility companies.

Before any excavation actually begins the estimated location of utility installations that may be encountered during digging will be determined, (sewer, telephone, fuel, electric, water lines, or any other underground installations, etc.). Also, before starting the excavation, Suburban Construction Management will contact the utility companies or owners involved and inform them, within established or customary local response times, of the proposed work.

To find the exact location of underground installations, employees will use safe and acceptable means. If underground installations are exposed, they will be removed, protected and/or properly supported.

Employees who are exposed to vehicular traffic will be required to wear warning vests or other suitable garments marked with or made of reflectorized or high-visibility material. Suburban Construction Management will provide these items and will ensure that they are worn.

On-The-Job Evaluation (Appendix 21)

The OSHA standard requires that a competent person inspect, on a daily basis, excavations and the adjacent areas for possible cave-ins, failures of protective systems and equipment, hazardous atmospheres, or other hazardous conditions. If these conditions are encountered, exposed employees will be removed from the hazardous area until the necessary safety precautions have been taken. Inspections are also required after natural (e.g. heavy rains) or man-made events such as blasting that may increase the potential for hazards. The responsibility for the inspections is that of the Superintendent or his designated representative.

Protective Support Systems

Suburban Construction Management and OSHA require that in all excavations in which employees are exposed to potential cave-ins, a protective system must be in place to protect those employees. These systems can include sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

Prior to designing a protective system, a number of factors including soil classification, depth of cut, water content of soil, changes due to weather and climate, or other operations in the vicinity will be determined to ensure the system is proper.

Sloping

Suburban Construction Management employs the OSHA mandated sloping guide for all of its excavations, on all of its projects. They are as follows:

Soil Type	Slope Angle	Degree	Benching
Solid Rock	Vertical	90	N/A
A	¾ : 1	53	4'
B	1 : 1	45	4'
C	1½ : 1	34	No

If a soil type is not known, it will be considered Type "C".

A registered engineer must design excavations in excess of 20 feet in depth. The data used to determine the design must be in writing and must include sufficient explanatory information to enable the user to make a selection, including the criteria for determining the selection and the limits on the use of the data. At least one copy of the information, including the identity of the registered professional engineer who

approved the data, will be kept at the work site during construction of the protective system.

Trench Boxes

Trench boxes will be used when other protective measures are not feasible. The trench boxes will be designed by a professional engineer and will have the design data with the box. If allowed by the manufacturer, boxes can be stacked and pinned. No personnel will be allowed in the trench box during the placement operation.

Shoring

Shoring will be used when other protective measures are not feasible. Shoring will be designed in accordance with the OSHA standard and/or will be manufactured equipment designed for shoring (Speed-Shore). A competent person will be present during the installation of the shoring.

Support Systems

Support systems such as shoring, bracing, or underpinning will be provided to ensure the stability of adjacent structures such as buildings, walls, sidewalks or pavements. No excavations will be allowed that are below the level of the base or footing of any foundation or retaining wall unless:

1. A support system such as underpinning is provided.
2. The excavation is in stable rock.
3. A registered professional engineer determines that the structure is sufficiently removed from the excavation and that excavation will not pose a hazard to employees.

Installation and Removal of Protective Systems

Suburban Construction Management requires the following procedures for the protection of employees when installing support systems:

1. Securely connect members of support systems.
2. Safely install support systems.
3. Never overload members of support systems.
4. Install other structural members to carry loads imposed on the support system when temporary removal of individual members is necessary.
5. As soon as work is completed, the excavation should be backfilled as the protective system is dismantled. After the excavation has been cleared, workers should slowly remove the protective system from the bottom up, taking care to release members slowly.

Water Accumulation

Suburban Construction Management prohibits employees from working in excavation where water has accumulated or is accumulating unless adequate protection has been taken. If water removal equipment is used to control or prevent water from

accumulating, the equipment and operations of the equipment must be monitored by a competent person to ensure proper use.

Hazardous Atmospheres

Excavations greater than four feet in depth must be tested as well as ones where oxygen deficiency or a hazardous atmosphere exists or could reasonably be expected to exist, before an employee enters the excavation.

If hazardous conditions exist, controls such as proper respiratory protection or ventilation must be provided (see section 10, Respiratory Policy). Also, controls used to reduce atmospheric contaminants to acceptable levels must be tested regularly.

Where adverse atmospheric conditions may exist or develop in an excavation, emergency rescue equipment, (e.g., breathing apparatus, a safety harness and line, basket stretcher, etc.) will be readily available. This equipment must be attended when used.

Access and Egress

Safe access and egress to all excavations will be provided to all personnel working in the excavation. Excavations four feet deep or more are required to have adequate means of exit, such as ladders, steps, ramps or other safe means of egress, must be provided within 25 feet of lateral travel. If structural ramps are used as a means of access or egress, they must be designed by a competent person.

Additional Hazards

In addition to cave-in hazards and secondary hazards related to cave-ins, there are other hazards from which workers must be protected during excavation related work. To protect employees from these hazards, Suburban Construction Management requires the following precautions be taken:

1. Keep materials or equipment that might fall or roll into an excavation at least two feet from the edge of excavations, or have retaining devices, or both.
2. Provide warning systems such as mobile equipment, barricades, hand or mechanical signals, or stop logs, to alert operators of the edge of an excavation. If possible, keep the grade away from the excavation.
3. Provide scaling to remove loose rock or soil or install protective barricades and other equivalent protection to protect employees against falling rock, soil, or materials.
4. Prohibit employees from working on faces of sloped or benched excavations at levels above other employees unless employees at lower levels are adequately protected from the hazard of falling, rolling, or sliding material or equipment.
5. Prohibit employees under loads that are handled by lifting or digging equipment. To avoid being struck by any spillage or falling materials, require

employees to stand away from vehicles being loaded or unloaded. If cabs of vehicles provide adequate protection from falling loads during loading and unloading operations, the operators may remain in them.

CONSTRUCTION LOCKOUT POLICY

Purpose:

This procedure establishes a lockout practice for securing machinery and equipment during periods of construction. It is essential that all subcontractors are consistent with their lockout procedure to ensure the safety of all employees. A lockout procedure is to render inoperative, electrical systems, pumps, pipelines, valves and all other such energy systems that may accidentally be energized or started up while employees are working on them or before they are mechanically ready and released for service.

Each contractor/subcontractor Safety Representative will administer the lockout/tagout program. All locks and applicable tags will be issued by the contractor and/or subcontractor Safety Representative to their foreman, general foreman, superintendents and employees as they are requested. The contractor's/subcontractor's Safety Representative will maintain a lock and tag log.

Procedure:

All energy sources shall be locked out and a "DANGER" tag affixed to the equipment or system indicating who installed the lock, craft, contractor's name, phone number, and the reason the system was locked out. Each employee shall be responsible for hanging their own lock and tag on the proper piece of equipment before starting work. No employee or other contractor may work behind a lock and tag belonging to another employee. Contractor or subcontractor supervision shall be responsible for assisting each employee in locating the proper piece of equipment to be locked out and tagged. Each employee involved with lockouts shall have a lock with an individual key. No locks with duplicate or master keys shall be used. Craft or gang locks shall not be used. Contractors and subcontractors are required to identify lock/tagout locks by either paint, die markings, etc.

If more than one employee is required to lockout and tag a circuit or piece of equipment, a multiple padlock device shall be used. After locking out and tagging a circuit, an attempt to energize the equipment shall be made by depressing or turning to "on" all starting stations before work begins. In no case shall work begin before circuits and equipment is tested to ensure that they are, in fact, de-energized.

Any employee who removes a tag or lock belonging to another employee or person, or overrides a tag or lock in anyway, shall be terminated immediately. Written authorization must be obtained from the foreman, general foreman, superintendent and Project Manager of the responsible contractor when a lock has been left on a piece of equipment and the originator is not available for removal.

When locks and tags are required, the craft personnel working on that Circuit shall notify their appropriate supervisor. The supervisor, or his designee, shall see that

appropriate locks and tags are provided. When work is completed, the appropriate supervisor is also to be notified when the lock(s) and tag(s) are removed.

Electrical systems which share a power source with a common main breaker may be worked as follows:

1. Where practical, the main breaker shall be opened and locked out per the Lock Out Procedure.
2. In cases where fuses are used to sub feed Branch circuits (more than one circuit) being supplied from one main breaker and the panel will not accept a padlock with a buddy device, the panel may be locked with the door key, the key then may be locked in a (Key Lock Box) which will accept a padlock and a buddy lock device. The fuses removed will be listed in the log book as if they were a main breaker.

Electrical systems being started up where locks are required for a few minutes on different parts of the systems shall be worked as follows:

1. The person doing the work shall lock out the equipment he or she is working on. This lock must be logged out to the person using the lock in the log book. In the event the lock should be required over night, or off shift, then the equipment shall be locked and logged out in accordance with the Construction Lock Out Procedure.

Examples of energy sources that are required to be locked out and tagged are:

1. Electrical systems will be locked through out the entire project. Anytime repairs or modifications are made to electrical systems, either temporary or permanent, they shall be locked out. Locks shall be applied to the main disconnect switch whenever possible. **All locks must be accompanied by a tag.**
2. Electrical systems that provide electrical power to equipment such as pumps and electrical motors shall be locked out by the appropriate subcontractor until such time that system is released.
3. Pipelines, valves and other such sources that could be inadvertently activated, causing a hazardous condition, shall be locked out, blanked off or otherwise secured to prevent accidental activation.
4. Lines, valves and similar systems that are being tested pneumatically or with other gases such as nitrogen, shall be tagged and/or locked out to prevent an accidental discharge of the pressure within the line. In addition, areas affected by the pneumatic test shall be barricaded against entry and inspected by the contractor or subcontractor's Safety Representative prior to commencement of the test.

When multi-worker or multi-craft situations exist, a multi-lockout tab is to be used. These devices allow for multiple locks for protection of all craft involved. Each lock must be properly tagged.

After equipment or systems are turned over to the owner no work or modifications will be done without Compliance to the Owner's Lockout/ Tagout Program.

When interface work is required on energized operations equipment, operations personnel must de-energize and lockout according to their procedure. Once operation personnel have rendered equipment and systems safe, then the contractor or subcontractor will lock on top of the owner's lockout system.

COMPANY VEHICLE FLEET POLICY

Overview

As a driver of a company vehicle, the authorized driver has been given certain privileges. Our employee assumes the duty of obeying all motor vehicle laws, maintaining the vehicle properly at all times and, otherwise, following the policies and procedures outlined in the following policy.

Vehicle Fleet Purpose

Company vehicles are provided to support business activities and are to be used only by qualified and authorized employees. They are not to be considered a part of an employee's compensation and will not be used as an inducement for employment. In all cases, our vehicles are to be operated in strict compliance with motor vehicle laws of the jurisdiction in which they are driven and with the utmost regard for their care and cost-efficient use. Our company vehicles may not be used for business activities of other companies or organizations. Vehicles may not be driven to foreign countries without prior approval of management.

Management Responsibilities

Our company management will be responsible for the implementation and maintenance of the fleet program. It is the responsibility of our management personnel to advise employees of the fleet program, provide initial safety orientation, and enforce the program should an employee operate a motor vehicle in a manner which is inconsistent with our policy.

- Management shall also provide CDL vehicles with safety devices including air pressure indicators, rear view mirrors, wheel chocks, safety struts, fire extinguishers, first aid kits, extra bulbs (lights) and flares / reflective triangles.
- Supervisors are responsible before the start of each shift to make sure drivers are in shape to drive and that vehicle inspections are completed and documented.
- Supervisors are responsible for driver orientation and training as described below.
- Management shall discipline and document drivers as required.

Driver Licensing

Company drivers and anyone authorized to drive our company vehicles must have a valid driver's license issued in the state of residence for the class of the vehicle being operated and must be able to safely drive the vehicle. Obtaining a driver's license is a personal expense and responsibility.

Driver Qualifications

Driver qualifications are as follows:

1. Must meet our Company's drug screening requirements.
2. Must be an authorized employee of our company.

3. Must have vision correctible to at least 20/40.
4. Must have at least one year of experience in the class of vehicle operated.
5. Must meet licensing requirements.
6. CDL drivers must meet commercial driver qualification requirements
7. CDL drivers required to transport placarded hazardous materials must have a valid hazardous material endorsement with their license.
8. Employees will not qualify for a company vehicle if, during the last 36 months, the driver has had any of the following experiences:

    - Has been convicted of a felony involving a company vehicle.
    - Has been convicted of sale, handling or use of drugs.
    - Has had automobile insurance cancelled, declined or not renewed by a company.
    - Has been convicted of an alcohol- or drug-related offense while driving.
    - Has had driver's license suspended or revoked.
    - Has been convicted of three or more moving violations or one or more other serious violations or at fault accident.
    - Has been convicted of reckless driving or speed contest.
    - Has been involved in two or more chargeable accidents.
    - Has been found guilty of leaving the scene or failure to report an accident.
    - Conspiracy or misrepresentation of identity.

In addition, CDL drivers and driver applicants will be disqualified to drive a commercial vehicle per Department of Transportation (DOT) standards:

- Until mandatory driver qualification requirements are achieved.
- Driver refused to be tested (for alcohol or drugs) by state or jurisdiction.

Review of Motor Vehicle Record

State Motor Vehicle Records (MVRs) will be used as the source for verifying driver history. MVRs will be obtained and reviewed periodically. Driving privileges may be withdrawn or suspended and/or the company vehicles removed for any authorized driver not meeting the above requirements. In addition, appropriate disciplinary action may be taken.

Driver Records and Corrective Action

Personnel files will include MVR, fleet accident histories, and corrective action documentation for employees who drive either company-owned vehicles or employee-owned vehicles used for company-related business.

Levels of corrective action shall include:

- No Action: One moving violation and/or non preventable accident in a three-year period.
- Counseling: Two moving violations in a three-year period and/or a preventable accident. The operator shall be advised by company management of his or her responsibility towards driving in a safe, courteous, and economical manner in accordance with the defensive driving concept.
- Suspension: Two preventable accidents, three or more moving violations or one major violation within a three-year period. The driver shall have driving privileges removed for a probationary period to be established by our Company Management. This includes driving of all company-owned vehicles as well as use of the driver's personal vehicle on company-related business. If any additional moving violations or major violations occur within the probationary period, the driver will not be permitted to drive any company vehicles or drive their own vehicle for any company-related purposes. If the employee's position is one that requires regular driving of company vehicles or driving of personal vehicles for company business, this may lead to termination of employment due to the inability of the employee to adequately perform his/her required employment duties.
- Revocation: Two or more preventable accidents in combination with three or more moving violations, three preventable accidents, four or more moving violations, or more than one major violation within a three-year period. The driver shall have all driving privileges removed for all company-related activities. This includes the use of company-owned vehicles and the use of the driver's personal vehicle for company related business. If the employee's position is one that requires regular driving of company vehicles or driving of personal vehicles for company business, this may lead to termination of employment due to the inability of the employee to adequately perform his/her duties.

Definitions:

Preventable Accident: "A collision in which the driver failed to do everything reasonable to prevent it". ("At-Fault" accidents typically are preventable accidents.)

Major violation: DWI, DUI, reckless driving, leaving the scene of an accident, vehicular homicide, speed in excess of 15 mph over the designated speed limit, driving under suspension or revocation, fleeing a police officer, chemical test refusal, unlawful transportation or use of weapons or explosives.

Personal Use

Company vehicles are provided primarily for business purposes; however, occasional personal use is permitted. *Personal use is a privilege extended only to the authorized employee.* The privilege of personal use may be withdrawn at any time without notice by the company.

The following rules apply to personal use of company vehicles:

- Only authorized employee may drive.

- The company vehicle may only be used for incidental trips within 25 miles of your home.
- Personal trailers, including boats and recreational vehicles, are not to be pulled.
- Company vehicle is not to be driven while under the influence of alcohol or any controlled substance.
- *Possession, transportation or consumption of alcohol or illegal drugs by anyone in the vehicle is not allowed.*
- Driver and all passengers must wear available personal restraints.
- Report any accident immediately to police and your manager.

Any exceptions to these rules requires advance, written approval by approved company manager or officer. Violation of these rules will result in disciplinary action from removal of driving privileges up to and including discharge.

Maintenance

Authorized drivers are required to properly maintain their company vehicles at all times. Vehicles should not be operated with any defect that would inhibit safe operation during current and foreseeable weather and lighting conditions. Preventive maintenance such as regular oil changes, lubrication, tire pressure and fluid checks determine to a large extent whether you will have a reliable, safe vehicle to drive and support work activities. You should have preventive maintenance completed on your vehicle as required in the owner's manual.

Personal Cars Used on Company Business

Any person, using their personal vehicle for company business must meet the following criteria:

- Satisfy the company driver qualification requirements.
- Provide a certificate of insurance with limits of liability of at least $100,000/300,000/50,000.
- The company must be named as additional insured on the driver's liability insurance policy.

Our organization does not assume any liability for bodily injuries or property damage the employee may become personally obligated to pay arising out of an accident occurring in connection with operation of his/her own car. The reimbursement to the employee for the operation of his/her car on company business includes the allowance for the expense of automobile insurance. The company does not specify and assumes no responsibility for any other coverage employees carry on their own cars since this is a matter of individual status and preference.

Traffic Violations

Fines for parking or moving violations are the personal responsibility of the assigned operator. The company will not condone nor excuse ignorance of traffic citations that result in court summons being directed to itself as owner of the vehicle. Each driver is required to report all

moving violations to our company office within 24 hours. This requirement applies to violations involving the use of any vehicle (company, personal or other) while on company business. Failure to report violations will result in appropriate disciplinary action.

Please be aware that traffic *violations incurred during non-business (personal use) hours* will affect your driving as well and are subject to review.

Accidents Involving Company Vehicles

In the event of an accident:

- Do not admit negligence or liability.
- Do not attempt settlement, regardless of how minor.
- Get name, address and phone number of injured person and witnesses, if possible.
- Exchange vehicle identification, insurance company name and policy numbers with the other driver.
- Take a photograph of the scene of accident, if possible.
- Call the police if injury to others is involved. You may want to call police even if there are no injuries.
- Complete an accident report.
- Turn all information over to your supervisor within 24 hours.

Accident Reporting and Review

Every driver is required to promptly report to our main company office any accident in which he/she is involved while operating a company owned or leased motor vehicle. This means reporting any contact between the company vehicle and another vehicle, person, or fixed object which results in death, injury, or property damage. Single vehicle accidents must be reported regardless of the severity of damage to the vehicle or injury to the driver. Such contact must be reported as an accident regardless of who was hurt, what property was damaged and to what extent, where it occurred, or who was responsible. All accidents must be reported to our main company office as soon as possible, but absolutely no later than 24 hours after the accident. All the facts, favorable or otherwise, must be reported. Copies of any police reports generated by the accident will be requested by management for review.

All motor vehicle accidents shall be reviewed by our main company office to determine if an accident was preventable, and if so, whether corrective action should be suggested for the employee or driver in question.

Preventable Accidents

A preventable accident is defined as, an accident in which the driver in question failed to exercise every reasonable precaution to prevent the accident.

1. Classification of preventable accidents

- Following too close
- Driving too fast for conditions
- Failure to observe clearances
- Failure to obey signs
- Improper turns
- Failure to observe signals from other drivers
- Failure to reduce speed
- Improper parking
- Improper passing
- Failure to yield
- Improper backing
- Failure to obey traffic signals or directions
- Exceeding the posted speed limit
- Driving While Intoxicated (DWI) or Driving under the Influence (DUI) or similar charges.

2. Fines for preventable accidents

   In order to remind drivers of their responsibility to drive defensively, a fee may be charged to the driver for each preventable accident as defined above. This fee, which applies to each accident, will be capped at the lesser of the actual damages or $500. Any exceptions to this policy will require the approval of our company president.

Thefts

In the event of theft of a company vehicle, notify local police immediately.

Driver Responsibilities

Each driver is responsible for the actual possession, care and use of the company vehicle in their possession. Therefore, driver's responsibilities include but are not limited to the following:

- Remain qualified by:
  - No more than 4 points accumulated from moving violations preventable accidents in accordance with the ***Driver's Rating Sheet***
  - Carry a current CDL or operator's license, as required per State.
  - Carry a current physical examination card (every 2 years), if you have a CDL.
  - Carry current controlled substance test results
- Operation of the vehicle in a manner consistent with reasonable practices that avoid abuse, theft, neglect or disrespect of the equipment.
- Vehicle inspections are to be performed by the operator prior to the beginning of the work day to ensure the vehicle is fit for safe operation. Any problems or concerns noted during the inspection should be reported immediately to the driver's supervisor.

- Perimeter inspections should be performed around the vehicle prior to entry into the vehicle - to reduce the potential of backing into or striking stationery objects.
- Obey all traffic laws. Know the local traffic regulations.
- Plan routes to minimize exposure, consider volume of traffic, schools, and congested areas.
- Drivers are responsible to avoid tracking dirt and mud onto roadways, use authorized entrances and exits with the proper storm water BMPs installed.
- The use of seat belts and shoulder harnesses are mandatory for driver and passengers.
- Adhere to manufacturer's recommendations regarding service, maintenance and inspection. Vehicles should not be operated with any defect that would prevent safe operation.
- Attention to and practice of safe driving techniques and adherence to current safety requirements.
- The use of vehicles is restricted to authorized drivers only.
- Drivers of rented trucks shall follow the same company policies as owned trucks
- Drivers will limit their working hours to 10 hours per day except in emergencies
- Report the occurrence of moving violations to supervisor.
- Transportation or storage of firearms, explosives, and associated devices or materials will not be permitted in company owned or leased vehicles.
- Transportation or storage of illegal drugs is strictly prohibited in company owned or leased vehicles, or in personal vehicles being used for company-related business.
- Driving under the influence of drugs and/or alcohol, as defined by State statute, is strictly prohibited in company owned or leased vehicles, or in personal vehicles being used for company-related business.

Failure to comply with any of these responsibilities will result in disciplinary action.

Driver Training

Driver error is the leading cause of accidents. All drivers must maintain a high-level safety awareness to avoid accidents. Training will begin during orientation and continue on throughout the driver's employment. Types of training conducted will include the following:

1. Orientation

It is very important to get the driver "off in the right direction" and should minimally include:

- Driving procedures
- Company policies and expectations
- Company employees and responsibilities
- Equipment familiarization and training
- Parking Procedures

2. Driver Safety Meetings

Safety meetings are valuable in providing "quick hit" type accident prevention information and maintaining open lines of communications between management and the driver. Driver safety meetings should be held on a regular basis. Topics that may be discussed are as follows:

- A discussion of recent accidents or near misses.
- A review of new laws, regulations or local ordinances.
- Safe driving practices, driving courtesy or general driving safety.
- Care and maintenance of vehicles.
- Physical problems involving driving such as reaction time, fatigue, stopping distances or weather.
- First aid or general health issues.

3. Instructional Driver Training

Approximately once a year, a driver training program may be presented to drivers. Also, the same type of training program may be required as a retraining tool for drivers who have had marginal driving experience. The purpose of these training programs will be to increase driver awareness and understanding of safe, courteous and efficient driving, and of accident avoidance techniques.

4. Hazardous Materials Driver Training:

Drivers who transport hazardous materials, who are not required to have a CDL with a hazardous materials endorsement, must receive function specific training as required by government standards. Training must include:

- Pre-trip safety inspections
- Use of vehicle controls and equipment, including operation of emergency equipment
- Operation of vehicle, including turning, braking, backing, parking, handling, and vehicle characteristics including those that effect stability, such as braking and curves, effect of speed on vehicle control, dangers associated with maneuvering through curves, danger associated with weather and road conditions that the driver may experience
- Procedures for maneuvering tunnels, bridges and railroad crossing
- Requirements pertaining to the attendance of vehicles, parking, smoking, routing and incident reporting
- Loading and unloading of materials including load securement

All employees who are responsible for the transport of hazardous materials must receive general awareness/familiarization training per government standards initially upon hire and once every three years thereafter. A written record must be maintained. This training should

provide employees with a familiarity of standards and enable the employee to recognize and identify hazardous materials consistent with the hazardous communication standards of the hazardous materials regulation.

For Hire (Sub Haulers, Subcontractors)

For hire drivers and their vehicles contract with our company for the purposes of moving materials from one location to another. While completing this task, the for-hire driver represents our organization and as such, must comply with the rules and regulations of our company plus all state, federal and local laws and ordinances. In addition, the for-hire drivers and their company must provide our organization proof of insurance in the amount of $1,000,000 combined single limit for their vehicle(s). In regards to driver qualification and vehicle condition, the for-hire company will, at our company's request allow auditing of driver qualification files, vehicle condition reports and vehicle maintenance files.

Safe Driving Practices - Driver rules for the road:

All company drivers are expected to drive in a safe professional manner at all times. Drivers should adhere to the following basic fundamental safe driving procedures.

Speed and following distance

1. Most rear-end accidents occur when the trailing vehicle is following too close and/or going too fast. Make sure to maintain a two second to four second spacing (plus additional spacing for vehicle length and speed) interval between your vehicle and the vehicle in front of you.
2. Always drive at or below the posted speed limit and no faster. There may be times where speed should be adjusted due to the prevailing traffic flow. Safety should always be the primary consideration.
3. Always comply with "advisory" speed limit warnings posted along construction sites or at congested intersections. Although these speed limits are not enforced by authorities, drivers are expected to fully comply with advisory speed limits.
4. When driving in inclement weather or when towing a heavy load, additional spacing should be allowed between your vehicle and the vehicle in front of yours. Speed should also be reduced.

Proper lane changing techniques

1. Numerous accidents occur when drivers fail to use proper lane changing techniques. When making a lane change, always check for vehicles approaching the intended lane or in the intended lane.
2. Always signal before making a lane change.
3. Do not depend on mirrors to detect vehicles traveling in your blind spot. Take a quick glance over your shoulder to check all blind spots before making a lane change. Not doing so is the primary cause of lane change accidents.

4. Make sure all rear view and side view mirrors are properly adjusted before beginning your trip.

Proper passing techniques

1. Always allow sufficient space in which to pass. Serious head-on collisions have occurred when the driver "thought" he/she had enough space to pass. When in doubt, DO NOT PASS.
2. Always use your turn signals to let drivers behind and in front know you are about to attempt a pass. Also use your signal before pulling back into the right-hand lane.
3. Pass only where it is legal to pass. DO NOT pass on hills, curves, at intersections, on bridges, in no passing zones or where double yellow lines are present.
4. After passing a vehicle, do not depend on rear view or side view mirrors to judge ample space to return to the right lane. Glance over your shoulder to confirm the position of other vehicles and to confirm there is adequate space to pull back into the right lane.
5. Do not pass unless it is absolutely necessary. If the vehicle in front of you is going the legal speed limit, what reason is there to pass?

Precautions at intersections

1. Always reduce speed when approaching an intersection even if you have the green light or crossing traffic has a stop sign. Many accidents have occurred when the "other person" proceeded through a red light or ran a stop sign. Drive for yourself and the other person.
2. When your light turns green, do not immediately proceed into the intersection. Look both ways before entering the intersection even if you have the right-of-way. Confirm that all crossing traffic has come to a complete stop.
3. When two vehicles approach a four way stop sign at the same time, the automobile to your right has the right-of-way. If there is confusion, always use hand signals and to be safe yield to the other driver. Do not be impatient.
4. If you observe a vehicle following closely behind you as you approach an intersection, tap your brake three or four times to make sure the other person is aware you are about to stop. This could prevent a rear-end collision.
5. If you are at an intersection waiting to make a left- or right-hand turn and the vehicle approaching you from the left has its turn signal on to turn right at the intersection, do not assume the other person will actually turn. Many times they don't.

Driving on interstate highways and freeways

1. Always drive at or below the posted speed limit. Refer to "Speed and Following Distance" earlier in this document.
2. When merging onto a multi-lane interstate, signal prior to merging and use the entrance ramp to pick up speed allowing you to enter traffic at the same speed as the traffic flow. DO NOT stop at the end of the entrance ramp and wait for traffic to clear.
3. Do not assume vehicles traveling in the right lane will move over, allowing you to merge into traffic. Many times, they will not move over. This causes accidents on a regular basis.
4. If there is a vehicle in front of you on an entrance ramp, continuously move your eyes from the side view mirror to the vehicle in front. DO NOT disregard the vehicle directly in front of

you. Many times, vehicles will slow down and sometimes come to a complete stop on the entrance ramp. Rear-end collisions associated with this situation are common.
5. When exiting an interstate, use your turn signal and exit at the same speed as the traffic flow. Many drivers will slow down as they approach the exit ramp. This is a serious hazard.
6. If you happen to drive past your intended exit, do not backup along the shoulder of the interstate. Instead, continue on to the next exit.

Proper backing procedures

1. Avoid backing up whenever possible. Before backing up your vehicle, walk around the vehicle to check for any objects in your path. Never assume your path is clear. Do not depend entirely on rear view and side view mirrors to detect objects in the path of your vehicle.

Proper turning techniques

1. Make every effort to be in the turning lane 200 to 300 feet prior to the intersection. Many accidents occur when drivers make a last second decision to make a turn.
2. Drivers should signal well in advance of the turn. Most state laws require a driver to signal at least 100 feet before making a turn.
3. Be extremely careful not to signal for your turn if, before reaching your intended turn, there is another street or driveway where you can turn. There have been numerous accidents when drivers thought the vehicle was going to turn before reaching them, but instead proceeded into or through the intersection.

Poor weather technique

1. During heavy rain storms, drivers should increase following distance an additional four seconds. When pulling heavy loads or driving a heavy class vehicle, increase following distance up to eight seconds.
2. During or after heavy rain storms, reduce speed well in advance of intersections, interstate ramps and other areas where vehicles merge.
3. During inclement weather (rain, fog, etc.) reduce overall speed to compensate for poor road conditions and visual impairment. Numerous accidents have occurred due to hydroplaning as a result of driving too fast for existing road conditions. Standing water WILL cause a vehicle to hydroplane.

Protecting against vehicle theft

1. Always lock your vehicle and take the keys with you. Make sure all windows are closed securely.
2. Do not leave valuables visible in your vehicle. Put them where they cannot be observed, but do so before you park so you will not be observed storing the valuables.
3. Park in well lighted and fenced areas when possible. At home, park in the driveway, or better yet in a locked garage. Avoid parking on the street. Park in secured areas when possible.
4. To thwart thieves, turn wheels sharply to the right or left. With front-wheel drive vehicles, use the emergency brake and put the vehicle in park to lock all four wheels.

5. If your vehicle is equipped with an anti-theft device, use it. Visible devices may discourage thieves.
6. Do not leave your driver's license or vehicle registration card in your vehicle. If the vehicle is stolen, a thief may use these documents to impersonate you.
7. Do not leave anything in the vehicle with your address on it. It may invite home burglary.
8. Do not discuss your destination, cargo contents, or other information with non-company personnel.

Acknowledgement of Responsibilities

My signature below confirms that I have been instructed as to the rules and responsibilities of our company's driver safety policy. I have read, understand and agree to abide by the conditions as stated in this document regarding the operation of any vehicle for company business.

GLOSSARY OF TERMS

Authorized person means a person approved or assigned by the employer to perform a specific type of duty or duties or to be at a specific location or locations at the jobsite.

Competent person means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Qualified person means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

Controlled access zone (CAZ) means an area in which certain work (i.e., overhead bricklaying) may take place without the use of guardrail systems, personal fall arrest systems, or safety net systems and access to the zone is controlled.

Guardrail system means a barrier erected to prevent employees from falling to lower levels.

Hole means a gap or void 2 inches (5.1 cm) or more in its least dimension, in a floor, roof, or other walking/working surface.

Infeasible means that it is impossible to perform the construction work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

Leading edge means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

Low-slope roof means a roof having a slope less than or equal to 4 in 12 (vertical to horizontal).

Lower levels means those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

Opening means a gap or void 30 inches or more high and 18 inches or more wide, in a wall or partition, through which employees can fall to a lower level.

Safety-monitoring system means a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

Steep roof means a roof having a slope greater than 4 in 12 (vertical to horizontal).

Toeboard means a low protective barrier that will prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

Unprotected sides and edges means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches (1.0 m) high.

Walking/working surface means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

Warning line system means a barrier erected on a roof to warn employees that they are approaching an unprotected roof side or edge, and which designates an area in which roofing work may take place without the use of guardrail, body belt, or safety net systems to protect employees in the area.

TECHNICAL SAFETY REQUIREMENTS

Aerial Lifts

Anytime aerial lifts, including: (1) extensible boom platforms, (2) aerial ladders, (3) articulating boom platforms, (4) vertical towers, or (5) a combination of any such devices, are used to elevate employees to job-sites above ground, the following safety rules will apply:

- No aerial lift this company owns or uses will be 'field modified' for uses other than those intended by the manufacturer unless: (1) the manufacturer certifies the modification in writing, or (2) any other equivalent entity, such as a nationally recognized testing lab, certifies the aerial lift modification conforms to all applicable provisions of ANSI A92.2-1969, and the OSHA rules at 1926.453. The lift must be at least as safe as the equipment was before modification.
- Operators shall test all controls and functions before use.
- Operators shall inspect all Aerial lifts before each shift.
- 100% tie off personal fall arrest fall protection is required in aerial lifts that have rotating, articulating or extending booms. Use the approved tie off point inside the basket.
- All operators shall be trained before using aerial lifts and the training must involve reading the operators manual.
- Always stand firmly on the floor of the basket, never sit or climb on the edge of the basket. Never use planks, ladders, or other devices for a work position.
- Never exceed boom and basket limits specified by the manufacturer.

Concrete

1. All reinforcing steel that an employee could fall onto or into (this includes horizontal steel) will have protective caps or an equivalent means of guarding.
2. No employee will be allowed to place or tie reinforcing steel more than six feet above a work surface unless proper fall protection is used.
3. All reinforcing steel will be braced in a manner to prevent overturning and collapse.
4. All manually guided rotating type powered concrete trowel machines will be equipped with a control switch that will automatically shut off when hands are removed from the machine.
5. Where bull float handles could come in contact with energized electrical conductors, the handle will be constructed of non-conductive material.
6. A copy of drawings or plans for jack layout, formwork, working decks, and scaffolding will be maintained at the job site.
7. Erected shoring will be inspected prior to, during, and immediately after concrete placement.
8. All vertical formwork will be braced in a manner to prevent overturning and collapse. The practice of using wire tied to reinforcing steel will not be considered adequate bracing.
9. During post-tension operations, only employees who are essential to jacking operations will be permitted behind the jacks.
10. Form removal will not be done until the concrete has gained sufficient strength to support its weight and superimposed loads.
11. Only employees required for erection of pre-cast members are permitted in the area of erection.
12. Additional requirements for concrete construction - refer to **CFR 29 Part 1926 Subpart Q**.

Cranes

The intent of crane safety procedures is to ensure all crane operations are per-formed in a safe manner. All crane work must be pre-planned to assure the safety of the process.

It is the responsibility of the Suburban Construction Management and/or the crane equipment supplier to assure any crane used on a Suburban Construction Management project is in a safe working condition. All cranes must comply with all applicable state or federal safety and health standards. It is also the responsibility of Suburban Construction Management to provide adequate site conditions for cranes onsite including a firm, drained and graded area that is sufficient to support the crane (Cribbing may also be needed). Suburban Construction Management shall inform the crane operator of all known underground hazards including but not limited to voids, tunnels, vaults, and underground utilities.

The following shall be followed when cranes are present on Suburban Construction Management jobsites:

1. The manufacturer's O&M requirements and specifications will be followed for the safe use of the crane including assembly and disassembly (unless following written "employer procedures).
2. The crane complies with all applicable state, federal or special requirements of the project.
3. The designated A/D (Assembly/Disassembly) director must be competent and qualified.
4. When employees must be in the fall zone to handle loads there must be a qualified rigger to assist with the rigging activities.
5. If synthetic slings are used during the assembly and disassembly of the crane than extra protection must be used to protect slings from damage.
6. All employees assigned to work with cranes must be trained on the procedures to be followed in case of electrical power line contact, crush/pinch points associated with the crane, and Lockout / Tagout procedures used in repair and maintenance.
7. Operator's manual must be available in the cab of the crane.
    - A copy of the cranes annual inspection is to be on file at the site at all times.
8. The annual inspection will be performed by a person qualified to inspect and certify cranes. A qualified person is also required for any inspections conducted after modifications, repair work, adjustments, assembly, service inspections, and for inspections on cranes that have been idle for 3 months.
9. The operator's view of the load charts will not be obstructed at any time.
10. A daily inspection shall be performed at the start of each shift and recorded on the daily crane inspection log. Inspection logs for daily (competent person) and monthly (competent person) crane inspections shall be documented and kept onsite for cranes used on Suburban Construction Management projects.
11. Suburban Construction Management requires that only certified or qualified operators will be allowed to operate cranes. The training shall be completed through an

accredited training organization and shall include a knowledge exam as well as a practical exam. Crane operator training must be updated every 5 years.

12. Crane operators shall not have any distractions (including using cell phones) while operating a crane on our projects.
13. Special permission, in the form of a "lift plan", is required for any lift that exceeds 75 percent of the rated capacity of the crane in the pick condition. (This is not applicable for mobile cranes equipped with operating computer systems or tower cranes with operating limit switches.)
14. Qualified signal persons shall be provided when the point of operation is not in view of the crane operator, the view of direction of travel is obstructed, or site-specific safety concerns warrant the use of a signal person.
15. All employees providing signals to the crane operator shall have “qualified signal person” training. Qualified signal persons are required to know and understand signals, be competent in using the signals, have a basic understanding of crane operation, and have completed a verbal/written evaluation in addition to a practical evaluation.
16. At no time will a crane be operated with computer systems or limit switches in a non-functioning or override condition. Crane safety devices such as the level indicator, boom/jib stops, check valves/holding devices for outriggers, locks for foot pedals, and the crane horn shall all be in good operating condition before using the crane.
17. The operator has the responsibility and authority to cease operation whenever an unsafe condition exists. The Superintendent will be "Immediately" contacted when this occurs.
18. Prior to all picks, the weight of the load must be known and the load chart consulted.
19. All outriggers must be fully extended and set on stable ground. Avoid setting outrigger pads on backfilled area. Any cribbing under outrigger is to be tightly planked.
20. The swing radius of the counter weight is to be barricaded prior to start of crane operation.
21. No alterations are to be made to any part of the crane without the written authorization of the crane manufacturer. Any structural repairs or modifications will meet the manufacturer's requirements and be inspected and re-certified.
22. Pick and carry operations are to be avoided if possible.
23. Prior to the on-site arrival of the crane, ensure that any electrical lines that will be in the working area are de-energized or relocated. If de-energizing or relocation is infeasible than the voltage must be determined to calculate the Minimum safe approach distance (MSAD). If keeping any portion of the crane outside the MSAD is infeasible than a meeting with the power supplier is mandatory. At this point the power supplier will establish a new MSAD. A dedicated spotter, warning line/barricades, insulating links (as determined by the power supplier), non-conductive rigging, non-conductive taglines, range limiter (if crane is equipped), 10’ barricades around entire crane for all non-essential employees, and grounding the crane are required.
24. Fall protection is required when the employees are 15 feet above lower levels for assembly / disassembly of cranes. Follow subpart M for fall protection guidelines. If the fall protection plan includes using the load line as an anchorage, no load shall be

suspended during this operation and there shall be communication with the operator prior to this activity.

25. If multiple tower cranes are onsite, they must be positioned so that they cannot touch each other during operation.
26. Any needed repair work scheduled for cranes onsite that may affect the safety of the employees onsite, must be communicated with these employees at the start of each shift.

The hoisting of personnel will be done only when all the requirements of **CFR 1926.550** (suspended personnel platforms) have been met.

Due to the seriousness of crane safety procedures, any operator or Superintendent who violates these procedures will be subject to immediate disciplinary action, up to and including termination.

For additional electrical requirements and information, refer to **OSHA Regulations – Subparts N (Helicopters, Hoists, Elevators, and Conveyors – 1926.550 – 1926.554) & Subpart CC (Cranes and Derricks in Construction - 1926.1400 – 1926.1501)**.

Demolition

1. Prior to permitting employee(s) to enter any building to be demolished, a survey will be made by an engineer or architect of record to ensure the possibility of collapse does not exist. This survey will be in written form and maintained at the job site.
2. All utilities will be shut off and disconnected outside of the building. Any utility company that is involved will be contacted.
3. Prior to starting demolition, it will be determined if any hazardous chemicals, gases, explosive or flammable material has been used in any pipes or tanks.
4. Asbestos will be removed by a licensed abatement company prior to commencement of any demolition work.
5. Lead will be removed by a licensed abatement company prior to commencement of any demolition work.
6. The following personal protection equipment is **MANDATORY** during all demolition operation:
    - Hard hats.
    - Safety glasses.
    - Leather gloves.
    - Hearing protection.
    - Full face shield. (If applicable)
    - Steel toed boots or foot guards. (if applicable)
    - Long sleeve shirts. (If applicable)
7. Exhaust system will be installed prior to starting demolition work. If respirator is required, refer to Suburban Construction Management respirator program.
8. Only stairways, ladders, and passage ways that have been designated for means of access will be used. All others will be barricaded off in a manner that prohibits their use.
9. All chutes that are positioned at a 45-degree angle or greater shall be fully enclosed on all sides.
10. All chute openings will be barricaded when not in use.
11. Dropping of material outside of the building without a chute is **STRICTLY PROHIBITED**.
12. Where material is dropped through a floor hole, the floor below will have a guard rail.

Electrical

It is the goal of Suburban Construction Management to assure that all temporary electrical equipment is maintained in a safe working condition to prevent electrical shock or fire. (By extension cords, electrical power tools, temporary breaker boxes on a construction site, temporary string lights, and etc.).

1. Ground fault circuit's interrupter **(GFCI)** will be used on all temporary electrical **15 and 20 amp – 120 volt**; this includes cord sets that are plugged into permanent building outlets.
2. The GFCI system will be checked on a monthly basis and will be recorded on Superintendent Daily Report.
3. All equipment to be used on the construction site will be tested!
    - All equipment will be tested before first use for grounding and continuity of the circuitry.
    - Equipment returned to service following repairs will be tested for continuity before being used.
    - All equipment will be tested after an event that might have caused damage. (e.g. Fire, vehicular travel over cord)
4. All breaker panels will be labeled on the outside cover with the voltage.
5. Each breaker will be numbered with a corresponding number of the receptacles it controls.
6. Extension cords will be of the three-wire type and will be designed for hard or extra hard use.
7. Extension cords will be visually inspected each day prior to use for:
    - Missing ground pin.
    - Cuts in outer insulation.
    - Proper strain relief at male and female fittings.
8. All lamps will be protected from accidental contact by protective covers.
9. Temporary lights will not be suspended by their cords unless the cord and light are designed for this means of suspension.
10. Electrical tools will be inspected each day prior to being put into service.
11. When pull boxes, switchboards, and panel boards become energized, they will be equipped with covers or the area will be secured so only qualified persons will have access.
12. Where cord sets are routed through floor holes, wall holes, doorway, or where subject to vehicular traffic, the cord set will be protected from damage by bushing or fittings that will eliminate the possibility of damage.
13. All 4-way and 2-way electrical boxes used in conjunction with temporary electrical will be UL approved. Job boxes are **PROHIBITED**.

For additional electrical requirements and information, refer to **OSHA Regulations – Subpart K – Electrical (1926.400 – 1926.449)**.

Equipment and Motor Vehicles

2. Upon delivery, each piece of equipment will be checked to ensure all safety features are operating properly. If a deficiency is found, equipment will be red tagged, "Out of Service", until repairs are made and equipment is re-checked. This applies to all company-owned, rented, and subcontractor's equipment.
3. All equipment with reverse gears will be equipped with a back-up alarm.
4. A fire extinguisher is to be mounted on each vehicle.
5. A First-Aid Kit is to be mounted in every vehicle.
6. At the beginning of each shift, the operator will check equipment prior to putting into service. Documentation of this check is required.
7. Seatbelts will be worn by all operators of equipment and motor vehicles.
8. Seatbelts will be worn by all passengers being transported in authorized motor vehicles.
9. All equipment that is fitted with a Roll Over Protection System (ROPS) will be equipped with seatbelts.
10. Riding on equipment by an employee other than the operator is PROHIBITED.
11. All operators of company-owned, hired or rented motor vehicles must have a valid, appropriate driver's license.
12. All forklift operators will be trained and carry certification of training.

Equipment Checklist:

- Service brakes – including trailer brake connections
- Brakes and hand brake
- Horn and back-up alarm
- Operating controls and steering mechanism
- Tires, rims and lug nuts
- Seatbelt(s) and all safety devices
- Lights, reflectors, windshield/wipers, and fire extinguisher

For additional equipment and motor vehicle requirements and information, refer to **OSHA Regulations – Subpart O – Motor Vehicles and Mechanized Equipment (1926.600 – 1926.606)**.

Excavations and Trenching

The purpose of trenching and excavation procedures is to prevent an injury or incident from occurring during this work process.

1. Prior to starting any excavation, the following **WILL** be done:
   - Contact local one call system and/or affected utility company.
   - Locate and identify all underground utilities on the project. This should be coordinated with local utility agencies and/or district representatives.
     Note: If at any time unidentified or non-located utilities are found, stop all work immediately and contact the Suburban Construction Management superintendent.
   - Insure that competent person is on site (if an excavation is part of subcontractor's work, secure name of competent person).
   - Determine protective system method to be used.
   - If shoring method other than outlined in 1926 Subpart P is to be used:
     - A registered engineer must design the shoring system.
     - A copy of the engineer designed and stamped drawings must be kept on site.
   - If available, consult boring log in contract documents to help establish soil type.
   - Complete Excavation Checklist. (**Appendix 21**)
   - If ground water is encountered, have equipment available for water removal.
   - Where possible, divert water run-off to keep from entering the excavation.
2. All surface encumbrances that create a hazard will be removed or supported prior to starting the excavation.
3. Where the stability of adjoining buildings, walls, or other structures is endangered by excavation operations, support systems such as shoring, bracing, or underpinning shall be provided to ensure the stability of such structures for the protection of employees.
4. Spoil piles and other materials must be kept 2 feet from the edge of the excavation.
5. A daily inspection of the excavation will be made and documented. Establish a daily inspection procedure and procedures for inspecting excavation after rain or any change in site conditions
6. Each employee working in or near an excavation will be trained in the recognition of the hazards associated with excavations.
7. A stairway, ladder, ramp, or other safe means of egress will be located in trench excavations that are 4 feet or more in depth so as to require no more than 25 feet of lateral travel for employees.
8. When excavations exceed 5 feet in depth, each employee or person in the excavation will be protected from cave-ins by an adequate protective system design. (Protective system designs include: 1. shoring, 2. sloping, 3. benching, and 4. shielding).
9. Suburban Construction Management projects require a positive means of fall protection when the work process exposes employees to a fall hazard of more than 6 feet. Remember that a fall hazard can be above or below grade. Fall protection must be used when working around trenching and excavation where a fall hazard exists.

10. Walkways must be provided where employees or equipment are required or permitted to cross over excavations. A guardrail system must be provided where walkways are 6 feet (1.8 m) or more above lower levels.
11. Where oxygen deficiency (atmospheres containing less than 19.5 percent oxygen) or a hazardous atmosphere exists or could reasonably be expected to exist, the atmospheres in the excavation must be tested before employees enter excavations greater than 4 feet in depth.

For additional excavation requirements and information, refer to **OSHA Regulations – Subpart P – Excavations (1926.650 – 1926.652).**

Fall Protection

Important!

Suburban Construction Management requires 100% fall protection over 6 feet.

The intent of fall protection is to prevent an employee's exposure to or suffering from an injury due to a fall from elevation. Because of the seriousness of fall injuries, employees must exercise extreme caution when exposed to a fall. If for any reason you are uncomfortable working at heights, notify your Foreman immediately. Use of fall protection systems and equipment is mandatory on Suburban Construction Management projects. Any employee found in violation of Suburban Construction Management fall protection requirements is subject to disciplinary action up to and including immediate termination.

A "Fall Protection System" is a physical means or method of fall protection provided to eliminate a fall exposure of 6 feet or greater. This may be accomplished by means of: ladders, scaffolds, lift units, guardrails, static lines, nets, vertical safety lines, retractable lanyards, full body harnesses, standard lanyards, and other fall protection equipment.

Suburban Construction Management requires that all fall protection issues on all projects are addressed by the appropriate contractor/subcontractor(s) through thorough analysis and pre-planning before the work begins. Equipment and systems must be designed, outlined and implemented based on the project safety plan to ensure that fall protection is provided to all employees. Any operation exposing an employee to a fall from an elevation of 6 feet or greater must be accompanied by a pre-approved, site-specific, written fall protection plan. The written plan must be fully engineered and detailed with approval by the project superintendent, project manager, or an authorized representative of Suburban Construction Management.

Suburban Construction Management projects require a positive means of fall protection when the work process exposes employees to a fall hazard of 6 feet or more. Remember that a fall hazard can be above grade or below it. Fall protection must be used when working around openings in the ground that could present a fall hazard. It is also important to remember that it is the responsibility of each subcontractor to train their employees and provide them with effective fall protection.

Any personal fall protection equipment that is subject to in-service loading (it was used to stop a fall) must be removed from service immediately. Fall protection equipment that has been used to stop a fall will be returned to the manufacturer for re-certification or inspected by a competent person.

All fall protection equipment and Personal Fall Arrest Systems (PFAS) will be inspected daily by a competent person, must meet all OSHA requirements, and must be used according to the manufacturer’s recommendations.

Suburban Construction Management **requires that all employees must be trained** in the recognition of all fall hazards that they could be exposed to, in the proper use, care and storage

of all personal fall protection equipment being used, and/or in the means and/or method that will be utilized to protect them.

Guardrail Systems

Employees exposed to a fall of 6 feet or greater and are not protected by a personal fall arrest system (PFAS) or other means of fall protection, must be protected by a standard guardrail system. The guardrail system will consist of a toprail 42 inches high (+/- 3 inches), midrail located midway between the top rail and working level, and toeboard a minimum of 3½ inches high. Guardrail systems must be capable of withstanding, without failure, a force of at least 200 pounds. Vertical posts are to be 8 feet on center maximum. If cable is used as a guardrail system, the cable must be maintained with a maximum of 3 inches of deflection including sag and must be flagged with a high visibility material every 6 feet minimum. **(29CFR 1926.502 (b))**

Safety monitoring systems.

Safety monitoring systems [See 1926.501(b)(10) and 1926.502(k)] and their use shall comply with the following provisions:

The roofing employer (safety monitors only apply to roofing activities) shall designate a competent person to monitor the safety of other employees and the employer shall ensure that the safety monitor complies with the following requirements:

- The safety monitor shall be competent to recognize fall hazards
- The safety monitor shall warn the employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner
- The safety monitor shall be on the same walking/working surface and within visual sighting distance of the employee being monitored
- The safety monitor shall be close enough to communicate orally with the employee
- The safety monitor shall not have other responsibilities which could take the monitor's attention from the monitoring function
- No employee, other than an employee engaged in roofing work [on low-sloped roofs] or an employee covered by a fall protection plan, shall be allowed in an area where an employee is being protected by a safety monitoring system
- Each employee working in a controlled access zone shall be directed to comply promptly with fall hazard warnings from safety monitors

Additional Fall Protection Requirements

1. Personal fall protection equipment must be used by all employees when exposed to a fall of 6 feet or more to another walking/working and no other means of fall protection is provided.

2. A full body harness will be worn with a lanyard properly attached to the tie rail when working out of the extendible and articulating boom platforms.
3. A full body harness will be worn by employees working out of suspended scaffolding. Lanyard will be secured to an independent lifeline separated from any line that is attached to the scaffold.
4. Safety nets will be provided when work places are more than 25 feet above the ground or floor where the use of other fall protection devices is impractical.
5. Positioning belts of the two (2) D ring type **WILL NOT** be used for fall arrest.
6. All snap hooks shall be double locking and gate faces shall be rated for 3600 lbs.

Questions regarding fall protection requirements, effectiveness, or systems should be referred to First Link Safety immediately.

For additional fall protection requirements and information, refer to **OSHA Regulations – Subpart M – Fall Protection (1926.500 – 1926.503)**.

Falling Object Protection

Toeboards

- Erected along the edge of the overhead walking/working surface for a distance sufficient to protect employees below
- Must be capable of withstanding, without failure, a force of at least 50 pounds applied in any downward or outward direction at any point along the toeboard
- Must be a minimum of 3½ inches in vertical height from their top edge to the level of the walking/working surface with not more than 1/4 inch clearance above the walking/working surface and be solid or have openings not over 1 inch in greatest dimension
- Where tools, equipment, or materials are piled higher than the top edge of a toeboard, paneling or screening shall be erected from the walking/working surface or toeboard to the top of a guardrail system's top rail or midrail, for a distance sufficient to protect employees below
- Guardrail systems, when used as falling object protection, shall have all openings small enough to prevent passage of potential falling objects

Floor and Other Openings

Floor and roof openings more than 2 inches in diameter will be covered with materials that are capable of supporting at least twice the weight of the total load that can be expected to be imposed. The cover will be identified by signage that states, "Hole or Cover – Do Not Remove" and secured to prevent accidental displacement. In lieu of a cover, a standard guardrail with toeboard can be installed.

Fire Protection

A fire on any of our projects could be devastating. The intent of fire protection is to prevent the potential for a fire. If a fire should start then we need to know how to minimize the damage.

Fire prevention is a function of planning, organization, housekeeping, and safe work practices by all employees. The most important element under our control is good housekeeping. Keep combustible materials picked up and stored in dedicated areas away from ignition sources. Loose materials or debris will not be tolerated on the project. This is everyone's responsibility.

Emergency fire procedures will be posted at the project office. All employees should be familiar with these emergency procedures.

Local fire service providers should be contacted during the initial phase of the project. They should be familiar with the location of the project. They will pre- plan for access into the job site, types and quantities of combustibles on site and any other information critical to their efforts. In many cases the fire department will also provide emergency rescue and medical services.

Fire extinguishers will be provided throughout the project and in hot work areas. Employees should be trained to identify and use the appropriate fire extinguisher and when to call for professional assistance.

1. General fire protection and emergency equipment must be kept free and clear from obstructions at all times and be properly located. This equipment must be easily visible and accessible.
2. A fire extinguisher rated not less than **2A** will be provided for each 3000 sq. ft. of building area or travel distance will not exceed 100'. If fire barrels are substituted for **2A** fire extinguishers, they must be 55 gallon, open top, with 2 each fire pails (with rounded bottoms) at each barrel. Fire barrels should be kept from freezing when applicable.
3. A fire extinguisher rated not less than **10B** must be located within 50 feet of wherever 5 gallons or more of flammable or combustible liquid or gas is being used.
4. All flammable or combustible liquids and gases must be stored a minimum of 20' from all buildings (This includes office trailers).
5. A fire extinguisher will be located within 5' of each set of oxygen and acetylene bottles, while welding and cutting operations are being performed. All combustible materials will be removed to a distance that will not allow heat, sparks, or slag to pose a fire hazard.
6. Outdoor portable fuel storage tanks will be contained within a dike area with a curb of a minimum of 12" in height around the perimeter of the tanks. Tanks will be provided with emergency venting. Tanks will have one (1) portable fire extinguisher having a rating not less than **20B**, and it will be kept not less than 25' and not more than 75' from the liquid storage area.

7. “No smoking” signs will be posted at **ALL** flammable storage areas, i.e. fuel tanks, paint storage.
    - Any person that discharges an extinguisher for other than fire extinguishing or other valid reason will be removed immediately from the project and will be subject to disciplinary action up to and including immediate termination.
    - As required by the project, a trained and equipped fire fighting (Fire Brigade) organization will be established and maintained.
    - As required by the project, a cutting, burning, and or welding permit may be needed. Upon completion, the work area will be examined by the person in whose name the permit is issued to ensure that all sparks, or embers are extinguished. The permit will be signed and returned to the Project Superintendent.

Forklift (Powered Industrial Truck) Training Requirements

Operator training.

Safe operation.

Ensure that each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by the successful completion of the training and evaluation.

Prior to permitting an employee to operate a powered industrial truck (except for training purposes), each operator has successfully completed the required training.

Training program implementation.

Trainees may operate a powered industrial truck only:

Under the direct supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence; and

Where such operation does not endanger the trainee or other employees.

Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace.

All operator training and evaluation shall be conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.

Training program content: Powered industrial truck operators shall receive initial training in the following topics, except in topics which Suburban Construction Management can demonstrate are not applicable to safe operation of the truck in the employer's workplace.

Truck-related topics:

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate
- Differences between the truck and the automobile
- Truck controls and instrumentation: where they are located, what they do, and how they work
- Engine or motor operation
- Steering and maneuvering
- Visibility (including restrictions due to loading)
- Fork and attachment adaptation, operation, and use limitations

- Vehicle capacity
- Vehicle stability
- Any vehicle inspection and maintenance that the operator will be required to perform
- Refueling and/or charging and recharging of batteries
- Operating limitations
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

Workplace-related topics:

- Surface conditions where the vehicle will be operated
- Composition of loads to be carried and load stability
- Load manipulation, stacking, and unstacking
- Pedestrian traffic in areas where the vehicle will be operated
- Narrow aisles and other restricted places where the vehicle will be operated
- Hazardous (classified) locations where the vehicle will be operated
- Ramps and other sloped surfaces that could affect the vehicle's stability
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation

Refresher training and evaluation.

Refresher training, including an evaluation of the effectiveness of that training, shall be conducted to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely.

Refresher training in relevant topics shall be provided to the operator when:

- The operator has been observed to operate the vehicle in an unsafe manner
- The operator has been involved in an accident or near-miss incident
- The operator has received an evaluation that reveals that the operator is not operating the truck safely
- The operator is assigned to drive a different type of truck
- A condition in the workplace changes in a manner that could affect safe operation of the truck

An evaluation of each powered industrial truck operator's performance shall be conducted at least once every three years.

Avoidance of duplicate training. If an operator has previously received training in a topic specified, and such training is appropriate to the truck and working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent to operate the truck safely.

Certification. The certification shall include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation.

General Safety and Health

1. General Safety and Health will be as outlined in **Sub Part C of CFR 1926**.
2. A fire protection and prevention plan will be developed and maintained for the duration of the project. (1926.24)
3. First aid and medical care will be established prior to project start-up. (1926.23)
4. Emergency telephone numbers for physicians, hospitals, ambulance and fire department will be posted at each phone.
5. Toilets will be furnished to meet or exceed the requirements of **Table D1 of 1926.51**.
6. An adequate supply of potable water will be provided in all places of employment. Single service cups and a trash receptacle in which to place the used cups will be provided.
7. Hearing protection is to be used in areas where the noise exposure can be anticipated to meet or exceed the DBA in **Table D2 of 1926.52**.
8. Only qualified and trained employees with proof of qualification will be allowed to operate laser equipment, per state law.
9. If asbestos is encountered, the following steps will be taken:
    - Evacuate all employees from the area containing asbestos.
    - Contact the Superintendent, Project Manager, and the corporate office.
    - **DO NOT** attempt to remove any asbestos.
    - **DO NOT** enter asbestos contamination area until a licensed contractor has removed the asbestos and air sampling results have been obtained showing that the air is free from asbestos.
10. Hazardous Communication CFA 1926.59
    - A copy of the company hazardous communication program will be maintained at the job site.
    - Employee will be trained in the handling of all hazardous material present at the work place.
    - Safety Data Sheets are to be kept for each hazardous material at the work place.
    - The SDS will be maintained in a manner where employee will have access to the SDS. The SDS book will include a table of contents and be arranged in a manner for quick access.
    - The SDS book should contain a section of those SDS's that correspond to material at the work place at that time.
    - On a project where an owner is occupying any portion of a building and his employee could be exposed to any hazardous material, the owner will be notified in writing the location of all Suburban Construction Management SDS and request the same information from the owner for his SDS.
    - All containers that have hazardous materials are to be labeled i.e. gas cans, form oil cans, curing compound cans, etc.
    - If an employee is exposed to a hazardous chemical, a copy of the SDS will accompany the employee to the treating physician.

- In the event that personnel are not able to read the SDS, a person will be assigned to assist the employee in understanding the material. This includes personnel that are non-English speaking.

Hand and Power Tools

While working on a construction project, employees will be required to operate and work around power tools and equipment. These tools and equipment must be operated in a safe manner. When assigned to operate equipment or a power tool, the employee must be familiar with its safe operation. The employee may be familiar with safe operating procedures from past experience; however, some equipment will be new or unfamiliar to the employee. An employee is not to operate any power tool or equipment until that employee has read and understands the operator's manual and a superintendent or foreman has explained how to use the power tool or equipment safely.

1. All hand and power tools will be inspected daily prior to use by the person who will be using them. Tools will be maintained in a safe condition (this includes employee furnished tools).
2. Guards on tools will be in operating condition. Any employee operating tools that require guards will not remove, alter, or in any manner render the guard inoperable. If the employee disregards the above requirements, the employee will be subject to disciplinary action up to and including dismissal from employment.
3. Power operated hand tools will be of the double insulated type or have a ground plug. All tools will be used in conjunction with a ground fault circuit interrupter (GFCI).
4. All power cords and power-operated tools will be checked each day prior to use to ensure that the cord does not have damaged outer insulation sheath and that the ground pin is in place. The employee using the equipment will complete the inspection.
5. All hand held circular saws, table saws, and radial arm saws will be locked out by means of disconnecting the saw from the power source and the male end of the cord tagged or in view of the operator at all times while changing the saw blade.
6. All pneumatic power tools and hoses will be secured by a positive means at each connection.
7. All fuel-powered tools will be stopped and the engines will not be running while refueling is in progress. A fire extinguisher rated not less than 10B will be readily available.
8. Only employees with appropriate experience or training will be allowed to operate power tools.
9. Only employees who have received training in powder actuated tool usage and posses a certification card will be allowed to operate powder activated tools.
10. Compressed air hose with over 1/2 " diameter connection fitting(s) will be safety wired or have wire whips installed prior to use to avoid accidental disconnection.
11. When feasible, saw horses or work benches will be used to secure material prior to using hand held saws, grinders, drills, and similar tools. These activities should not be attempted against body parts.

Housekeeping

It is the policy of Suburban Construction Management that all projects and work areas will not be allowed to have debris accumulate. Trip and fall accidents are a major cause of injury in the construction industry. These types of incidents can be directly related to poor housekeeping. Therefore, the following will be the minimum requirements.

1. All walkways, ramps, stairway, and access points to ladders will be kept free of debris or stored material.
2. All trash and debris will be cleaned up and disposed of on a daily basis.
3. Laydown areas, parking lots and temporary facilities will be kept in a clean and orderly manner.
4. Trash barrels will be located at each water bucket location and used cups will be deposited in the trash barrel.
5. All combustible material, such as oily rags, will be deposited in a separate container with a lid to prevent the possibility of fire.
6. No glass bottles are allowed on the site.
7. Construction materials such as scrap sheet rock, broken block \ brick, and loose conduit will be picked up on a daily basis.
8. All material will be stacked in a manner to avoid spreading or tilting.
9. Each sub-contractor will be responsible for controlling and removing any materials or debris created by work performed by their employees. If after being notified by a Suburban Construction Management representative a subcontractor does not keep his/her portion of work cleaned, Suburban Construction Management after 24 hours written notice will perform the necessary clean-up and the subcontractor will be charged in a time and materials manner.
10. All scraps that are produced from employee lunches will be removed from the job site daily by the employee. Employee's failure to comply may result in his/her removal from the project.
11. Scrap wood and other materials will have nails removed or bent-over as the material is initially removed.

Ladders

General Requirements:

1. Ladders must be capable of supporting the following loads without failure:
   - Each portable ladder: At least 4 times the maximum intended load
   - Each extra-heavy-duty type 1A metal or plastic ladder: At least 3.3 times the maximum intended load.
2. Ladder rungs, cleats, and steps must be parallel, level, and uniformly spaced when the ladder is in position for use.
3. Rungs, cleats, and steps of portable ladders must be spaced not less that 10 inches apart, nor more than 14 inches apart.
4. The minimum clear distance between side rails for all portable ladders must be 11½ inches.
5. A metal spreader or locking device must be provided on each stepladder to hold the front and back sections in an open position when the ladder is being used.
6. Wood ladders may not be coated with any opaque covering, except for identification or warning labels which may be placed on one face only of a side rail.
7. Job-built wooden ladders must have wooden spacer blocks installed between each rung. This includes the bottom rung. DO NOT cut into the side rail to receive the ladder rung.

Ladder Use

1. When portable ladders are used for access to an upper level, they must extend 3 feet beyond the level being accessed and secured.
2. Extension or straight ladders must be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder.
3. Ladders must be maintained free of oil, grease, and other slipping hazards.
4. Ladders may not be loaded beyond the maximum intended load or beyond the manufacturer's rated capacity.
5. Ladders must be used only for the purpose for which they were designed.
6. Ladders must be used only on stable and level surfaces unless secured to prevent accidental displacement.
7. Ladders must not be used on slippery surfaces unless secured.
8. Ladders placed in any location where they can be displaced by workplace activities must be secured to prevent accidental displacement or barricaded.
9. The area around the top and bottom of the ladder must be kept clear.
10. Ladders may not be moved, shifted, or extended while occupied.
11. Ladders must have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized equipment.
12. The top or top step of a stepladder may not be used as a step.
13. Cross-bracing on the rear section of stepladders may not be used for

climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.

14. Each employee using a portable ladder must inspect that ladder prior to use.
15. Ladders must be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.
16. Portable ladders with structural defects must either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and must be withdrawn from service until repaired.
17. Ladder repairs must restore the ladder to a condition meeting its original design criteria, before the ladder is returned to use.
18. When ascending or descending a ladder, the user must face the ladder.
19. Each employee must use at least one hand to grasp the ladder when progressing up and/or down the ladder.
20. An employee must not carry an object or load that could cause the employee to lose balance and fall.

The following rules must be followed by all employees when placing, ascending or descending ladders:

- Use the *three points of contact* rule when going up or down a ladder. If material must be handled, raise or lower it with a rope either before going down or after climbing to the desired level.
- Always face the ladder when ascending or descending.
- Never slide down a ladder.
- Be sure shoes are not greasy, muddy, or slippery before climbing.
- Carry tools in a tool belt, not in the hand.
- Never lean too far to the sides. Keep your belt buckle within the side rails.
- Use a 4 to 1 ratio when leaning a straight or extension ladder and never climb higher than the third rung from the top.
- If a straight or extension ladder is being used to access another working level, the side rails must extend 3 feet beyond the access point and the ladder must be secured.
- Be sure that a stepladder is fully open and the metal spreader locked before starting to climb.
- Never stand on the top step or the top of a stepladder.
- A stepladder is a work platform and not to be used for access to another working surface.
- Inspect each ladder for defects before using.
- Never use a defective ladder. Tag or mark it so that it will be repaired or destroyed.
- Never splice or lash ladders together.
- Never use makeshift ladders, such as cleats fastened across a single rail.
- Keep ladders clean and free from dirt and grease.
- Never use ladders during a strong wind except in an emergency and then only when they are securely fastened.
- Never attempt to adjust a ladder while a user is standing on the ladder.
- Never jump from a ladder. Always dismount from the bottom rung.

Ladder Ratings

There are many types of portable ladders, but they all receive one of four ratings, based on their maximum working load (the maximum weight they can safely support).

Rating	**Working Load**
Extra heavy duty (I-A)	300 pounds
Heavy duty (I)	250 pounds
Medium duty (II)	225 pounds
Light duty (III)	200 pounds

Before you use a ladder, check its rating. And be sure not to subject it to a load greater than its rated capacity.

Ladder Training

Each employee must receive training by a competent person in the following areas:

- The nature or fall hazards.
- The proper construction, use, placement, and care in handling of all stairways and ladders.
- The maximum intended load carrying capacity of ladders.
- Intended purposes of ladders.
- The contents of **1926 Subpart X**.

For additional stairway and ladder requirements and information, refer to **OSHA Regulations – Subpart X – Stairways and Ladders (1926.1050 – 1926.1060)**.

Masonry

1. Prior to the start of masonry walls, a limited access zone will be established.
    - The limited access zone will be the height of the wall plus 4 feet.
    - Limited access zone will run the full length of the wall being erected.
    - Limited access zone will be on the scaffolded and un-scaffolded side of the wall.
    - Only employees who are actively engaged in the construction of the wall are permitted to enter the limited access zone.
    - Limited access zone will remain in place until the wall is adequately braced.
    - All masonry walls over eight feet in height shall be adequately braced to prevent overturning and to prevent collapse unless the wall is adequately supported so that it will not overturn or collapse. The bracing shall remain in place until permanent supporting elements of the structure are in place.
2. Concrete mixers will be equipped with guards on all moving parts.
3. At no time will an employee attempt to clean out the hopper until the power to the equipment has been shut off.
4. Empty concrete sacks will be disposed of immediately.
5. Mixer operator will wear proper personal protective equipment while performing mixer operations.
6. Employees operating masonry saws will be guarded with a semi-circular enclosure over the blade. The operator will wear safety glasses and a face shield.
7. The motor frames on all stationary saws will be grounded.
8. Brick stacks will not exceed 7 feet in height. Taper back 2 inches per foot after 4 feet.
9. CMU blocks stacked higher than 6 feet will be tapered back ½ block per tier above the 6-foot level.

For additional concrete and masonry requirements and information, refer to **OSHA Regulations – Subpart Q – Concrete and Masonry Construction (1926.700 – 1926.706)**.

Material Handling

Appropriate materials storage and handling can help reduce job-site accidents and worker injuries. It can also make the construction process much more productive. One of the leading causes of construction worker fatalities is being "struck by" objects. The following basic materials handling and storage principles can help reduce "struck by" incidence.

- Methods of Prevention:
  - Whether moving materials manually or mechanically, Suburban Construction Management employees shall be aware of the potential hazards associated with the task at hand and know how to exercise control over their workplaces to minimize danger.
- Moving, Handling, and Storing Materials:
  - When manually moving materials, Suburban Construction Management employees shall seek help when a load is so bulky that it cannot be properly grasped or lifted, when they cannot see around or over it, or when load cannot be safely handled.
  - When a Suburban Construction Management employee is placing blocks under raised loads, the employee shall ensure that the load is not released until their hands are clearly removed from the load. Blocking materials and timbers should be large and strong enough to support the load safely. Materials with evidence of cracks, rounded corners, splintered pieces, or dry rot shall not be used for blocking.
  - Handles and holders shall be attached to loads to reduce chances of getting fingers pinched or smashed. Workers shall also use appropriate protective equipment. For loads with sharp or rough edges, wear gloves or other hand and forearm protection. To avoid injuries to the hands and eyes, use gloves and eye protection. When loads are too heavy or bulky, each Suburban Construction Management employee shall also wear steel-toed safety shoes or boots to prevent foot injuries if the worker slips or accidentally drops a load.
  - When mechanically moving materials, avoid overloading the equipment by letting the weight, size and shape of the materials being moved dictate the type of equipment used for transporting it. All materials handling equipment has rated capacities that determine the maximum weight the equipment can safely handle and the conditions under which it can handle those weights. The equipment-rated capacities must be displayed on each piece of equipment and must not be exceeded except for load testing.
  - Stored materials must not create a hazard. Storage areas must be kept free from accumulated materials that may cause tripping, fires or explosions or that may contribute to the harboring of rats and other pests. When stacking and piling materials, it is important to be aware of such factors as the materials' height and weight, how accessible the stored materials are to the user, and the condition of the containers where the materials are being stored.
  - All bound material should be stacked, placed on racks, blocked, interlocked, or otherwise secured to prevent it from sliding, falling or collapsing. A load greater than that approved by a building official may not be placed on any floor of a building or other

structure. Where applicable, load limits approved by the building inspector should be conspicuously posted in all storage areas.

- When stacking materials, height limitations should be observed. For example, lumber must be stacked no more than 6 feet high if it is handled manually; 20 feet is the maximum stacking height if a forklift is used. For quick reference, walls or posts may be painted with stripes to indicate maximum stacking heights.
- Used lumber must have all nails removed before stacking. Lumber must be stacked and leveled on solidly supported bracing. The stacks must be stable and self-supporting. Stacks of loose bricks should not be more than 7 feet in height. When masonry blocks are stacked higher than 6 feet, the stacks should be tapered back one-half block for each tier above the 6-foot level.
- Bags and bundles must be stacked in interlocking rows to remain secure. Bagged material must be stacked by stepping back the layers and cross-keying the bags at least every ten layers. To remove bags from the stack, start from the top row first. Baled paper and rags stored inside a building must not be closer than 18 inches to the walls, partitions, or sprinkler heads. Boxed materials must be banded or held in place using cross-ties or shrink plastic fiber.
- Drums, barrels and kegs must be stacked symmetrically. If stored on their sides, the bottom tiers must be blocked to keep them from rolling. When stacked on end, put plank, sheets of plywood dunnage or pallets between each tier to make a firm, flat, stacking surface.
- When stacking, consider the need for availability of the material. Material that cannot be stacked due to size, shape or fragility can be safely stored on shelves or in bins. Structural steel, bar stock, poles, and other cylindrical materials, unless in racks, must be stacked and blocked to prevent spreading or tilting, Pipes and bars should not be stored in racks that face main aisles; this could create a hazard to passers-by when supplies are being removed.

Personal Protective Equipment

Personal Protective Equipment (PPE) is equipment designed and intended to enhance an individual employees' protection from hazards in the workplace. Employees who do not have and use the adequate PPE will be in violation of the Suburban Construction Management safety program and will not be allowed to continue their work until adequate PPE is acquired and training in its use is completed. Once PPE is issued, it is the employee's responsibility to see that it is maintained in good safe condition. PPE will be inspected daily.

Some items may be furnished for a specific use or project only. This equipment will be signed out to you specifically and you will be responsible for its care and return before leaving the project.

Head Protection

Hard hats are required at ALL times while overhead dangers exist, except in designated break areas, office trailers, or while riding \ operating enclosed passenger vehicles.

1. Hard hats will meet American National Standards Institute Z 89.1 - 1969.
2. Hardhats are to be worn face forward, with the adjustable fitting in back and the brow cushion in front. Hard hats will be unaltered and free of paint.

Footwear

1. Sturdy leather work boots will be worn at all times during construction activities. Tennis shoes, track shoes, sandals, loafers, or athletic shoes are NOT considered proper footwear for a construction site. Steel toed boots or foot guards will be required for certain construction activities, i.e. operating hand operated compacting equipment, operating a jack hammer, or when the hazard of foot injury exists.
2. Rubber boots will be worn for concrete work.

Eye and Face Protection

1. Employees will have safety glasses with side shields with them at all times. All employees will wear eye protection appropriate for the tasks being performed. The type of eye protection required should be determined during the pre-job and pre-task planning. Non-ANSI Z47 glasses are not suitable when safety glasses are required.
2. During the placement of concrete, eye protection is mandatory. Concrete finishers during the finishing stages are not required to wear eye protection.
3. Eye and face protection will be utilized in accordance with CFR 1926.102 table E1.

Clothing

1. Tank tops, muscle shirts, and sleeveless shirts are prohibited on site. Loose fitting garments, shirt tails, or floppy sleeves will be contained at all times.
2. Long pants are required at all times.

Hearing Protection

1. Suburban Construction Management has a mandatory hearing protection policy for all employees when an exposure exists. Hearing protection is required to be used when ambient or local noise levels exceed 85 DBA.
2. Hearing protection will be supplied in the form of foam earplugs and will be available on the project. Training in the proper use of earplugs is required.
3. Disposable earplugs will not be reused. Always wear clean earplugs.
4. Appropriate for the activity, other types of protection will be supplied and used (e.g. Muffs).
5. Hearing protection per CFR 1926.101 will be used as required.

Hand Protection

Gloves will be worn when handling certain chemicals, sharp objects, hot objects, or when the possibility of hand injury exists and for winter protection.
Gloves are mandatory in demolition work.

Protective equipment as outlined on Safety Data Sheet will be worn when working with hazardous materials that are under the guidelines of CFR 1926.59.

Rigging

1. All rigging and hardware will be selected to safely handle the weight of the load.
2. Rigging is to be inspected daily. All defective rigging is to be red tagged and taken out of service.
3. Only personnel who are experienced will be allowed to perform rigging tasks.
4. Rigging will be stored in a manner that will protect the rigging from damage.
5. Both the weight of the load and the center of gravity will be known prior to the lift being performed.
6. Tag lines are to be attached to all loads. Tag lines should be made of non- conductive material and be at least ten (10) feet long and be well secured to the load.
7. The practice of christmas treeing loads is **STRICTLY FORBIDDEN**.
8. Rigging used in conjunction with suspended personnel platforms are not to be used for any other purpose.
9. An erection plan will be made prior to all lifts and will be kept on the job site.

For additional crane requirements and information, refer to **OSHA Regulations – Subpart N – Cranes, Derricks, Hoists, Elevators, and Conveyors (1926.550 – 1926.555)**.

Scaffolds

Definitions

Brace means a rigid connection that holds one scaffold member in a fixed position with respect to another member, or to a building or structure.

Cleat means a structural block used at the end of a platform to prevent the platform from slipping off its supports. Cleats are also used to provide footing on sloped surfaces such as crawling boards.

Competent person means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Equivalent means alternative designs, materials or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

Exposed power lines means electrical power lines which are accessible to employees and which are not shielded from contact. Such lines do not include extension cords or power tool cords.

Fabricated decking and planking means manufactured platforms made of wood (including laminated wood, and solid sawn wood planks), metal or other materials.

Fabricated frame scaffold (tubular welded frame scaffold) means a scaffold consisting of a platform(s) supported on fabricated end frames with integral posts, horizontal bearers, and intermediate members.

Failure means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

Guardrail system means a vertical barrier, consisting of, but not limited to, toprails, midrails, and posts, erected to prevent employees from falling off a scaffold platform or walkway to lower levels.

Horse scaffold means a supported scaffold consisting of a platform supported by construction horses (saw horses). Horse scaffolds constructed of metal are sometimes known as trestle scaffolds.

Lower levels means areas below the level where the employee is located and to which an employee can fall. Such areas include, but are not limited to, ground levels, floors, roofs, ramps, runways, excavations, pits, tanks, materials, water, and equipment.

Maximum intended load means the total load of all persons, equipment, tools, materials, transmitted loads, and other loads reasonably anticipated to be applied to a scaffold or scaffold component at any one time.

Mobile scaffold means a powered or unpowered, portable, caster or wheel-mounted supported scaffold.

Open sides and ends means the edges of a platform that are more than 14 inches away horizontally from a sturdy, continuous, vertical surface (such as a building wall) or a sturdy, continuous horizontal surface (such as a floor), or a point of access. Exception: For plastering and lathing operations the horizontal threshold distance is 18 inches.

Outrigger means the structural member of a supported scaffold used to increase the base width of a scaffold in order to provide support for and increased stability of the scaffold.

Platform means a work surface elevated above lower levels. Platforms can be constructed using individual wood planks, fabricated planks, fabricated decks, and fabricated platforms.

Rated load means the manufacturer's specified maximum load to be lifted by a hoist or to be applied to a scaffold or scaffold component.

Scaffold means any temporary elevated platform (supported or suspended) and its supporting structure (including points of anchorage), used for supporting employees or materials or both.

Supported scaffold means one or more platforms supported by outrigger beams, brackets, poles, legs, uprights, posts, frames, or similar rigid support.

Walkway means a portion of a scaffold platform used only for access and not as a work level.

Scaffold Requirements

1. Prior to erection, a competent person shall inspect all scaffold parts and components. Any scaffold component that is defective will be taken out of service.
2. Scaffold components manufactured by different manufacturers may not be inter-mixed unless the components fit together without force and the scaffold's structural integrity is maintained. Scaffold components manufactured by different manufacturers may not be modified in order to inter-mix them unless a competent person determines the resulting scaffold is structurally sound.
3. Scaffolds must be erected, moved, dismantled, or altered under the supervision and direction of a competent person. Such activities are to be performed only by experienced and trained employees selected for such work by the competent person.
4. Upon completion of the scaffold erection, a competent person will inspect the scaffold and all its components to insure proper erection.
5. Scaffolds and scaffold components will not be loaded in excess of their maximum intended loads or rated capacities, whichever is less.
6. Scaffolds and scaffold components must be inspected for visible defects by a competent person before each work shift, and after any occurrence that could affect a scaffold’s structural integrity.

7. Whenever a scaffold is not in use, place a sign at all access points "**Scaffold out of service**".
8. All supported scaffolds must be erected on footing that is sound, rigid and capable of supporting twice the intended load without settling or displacement.
9. Supported scaffold poles, legs, posts, frames, and uprights must bear on base plates and mud sills or other adequate firm foundation. Unstable objects such as bricks, concrete blocks and similar materials may not be used to support the mud sill or scaffold frames.
10. All scaffolds must be erected plumb and level.
11. Frames must be joined together vertically by coupling or stacking pins or equivalent means.
12. Where uplift can occur, which would displace scaffold end frames, the frames or panels must be locked together vertically by pins or equivalent means.
13. Each scaffold platform or walkway must be a minimum of 18 inches wide.
14. No ramp or walkway may be inclined more than a slope of one (1) vertical to three (3) horizontal (20 degrees above the horizontal).
15. Work platforms between 4 feet and 10 feet in height must be a minimum of 45 inches horizontally in both directions.
16. Each platform on all working levels of scaffolds must be fully planked or decked between the front uprights and the guardrail supports as follows:
    Each platform unit is to be installed so that the space between adjacent units and the space between the platform and the uprights is no more than 1 inch wide, except if it can be demonstrated that a wider space is necessary (for example, to fit around uprights when side brackets are used to extend the width of the platform). The platform must be planked or decked as fully as possible and the remaining open space between the platform and the uprights may not exceed 9½ inches.
17. All scaffold planks must be scaffold grade or equivalent. Any scaffold planks that are damaged will be taken out of service immediately.
18. All planking of platforms must be overlapped over a support a minimum of **12 inches** and/or be secured from movement.
19. Scaffold planks must extend over their end supports by a minimum of **6 inches** and maximum of **12 inches**.
20. Safe access must be provided to all scaffold work platforms. When access to scaffold is greater than **2 feet** from ground or access to a work platform is greater than **2 feet**, a portable or attachable ladder, or another acceptable means of access must be provided. (The ladder must extend 3 feet beyond the level being accessed and be secured.)
21. Climbing on scaffold crossbraces is **STRICTLY PROHIBITED**.
22. Each employee on a scaffold more than **10 feet** above a lower level must be protected from falling to that lower level.
23. Guardrail systems must be installed along all open sides and ends of platforms and meet the following requirements:
    - Toprails must be installed between **38 inches** and **45 inches** above the work platform with midrails approximately midway between.
        - **Crossbracing** is acceptable in place of a **midrail** when the crossing point is between **20 inches** and **30 inches** above the work platform.

    - **Crossbracing** is acceptable in place of a **toprail** when the crossing point is between **38 inches** and **48 inches** above the work platform.
  - Each toprail must be capable of withstanding, without failure, a force of at least **200 lbs** and each midrail must withstand **150 lbs**.

24. The clearance between scaffolds and power lines shall be as follows: Scaffolds shall not be erected, used, dismantled, altered, or moved such that they or any conductive material handled on them might come closer to exposed and energized power lines than as follows:
  - **Insulated Lines**

Less than 300 volts	3 feet
300 volts to 50 kv	10 feet
More than 50 kv	10 feet + 0.4 inches for each 1 kv over 50 kv

  - **Uninsulated Lines**

Less than 50 kv	10 feet
More than 50 kv	10 feet + 0.4 inches for each 1 kv over 50 kv

  If there is ever any doubt or confusion about scaffolds and power lines, contact the power company.
25. All employees working on or around a scaffold must wear a hardhat.
26. Toeboards must be a minimum of **3½ inches** high and installed to protect employees where falling objects are a hazard.
27. Where there is a danger of tools, material or equipment falling from a scaffold and striking employees below, the area below the scaffold must be barricaded.
28. Debris will not be allowed to accumulate on platforms.
29. Makeshift devices (buckets, boxes, barrels, etc.) will not be used on scaffold platforms to increase the height of the working level.
30. Ladders will not be used on scaffold platforms to increase the height of the working level. (Exception: large area scaffold and must meet criteria outlined in OSHA Regulations – Subpart L - 1926.451(f)(15)(i-iv))
31. To help control movement and prevent tipping, scaffolds greater than 3 feet wide with a height to base width ratio greater than 4:1 must be secured to the structure at each end and at intervals not to exceed **30 feet** horizontally and **26 feet** vertically. Scaffolds 3 feet wide or less with a height to base width ratio greater than 4:1 must be secured to the structure at both ends and at intervals not to exceed **30 feet** horizontally and **20 feet** vertically.
32. The use of shore or lean-to scaffold is prohibited.
33. Mobile Scaffolding will meet the following requirements:
  - The height of free-standing towers will not exceed Four Times the minimum base dimension.
  - All casters will be equipped with positive locking devices and in the locked position when employees are on the working platform.
  - Mobile scaffolds must have all cross braces in position including a horizontal diagonal brace.

- Employees will be allowed to remain on a mobile scaffold when the scaffold is being moved only if OSHA requirements are followed. (Refer to OSHA Regulations – Subpart L - 1926.452(w)(2), (3), (6) and (10) for requirements)
- All working levels must be fully planked, no matter what the height of the work platform.

34. Horse scaffolds will meet the following requirements:
    - Scaffold work surface must be a minimum of 18 inches wide and of scaffold grade plank material.
    - Scaffolds may not to be constructed or arranged more than two (2) tiers or 10 feet in height, whichever is less.
    - When horses are arranged in tiers, each horse will be placed directly over the horse in the tier below.
    - When horses are arranged in tiers, the legs of each horse will be nailed down or otherwise secured to prevent displacement.
    - When horses are arranged in tiers, each tier shall be crossbraced.
35. Each employee who performs work while on a scaffold must be trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training must include the following areas, as applicable:
    - The nature of any electrical hazards, fall hazards and falling object hazards in the work area.
    - The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
    - The proper use of the scaffold, and the proper handling of materials on the scaffold.
    - The maximum intended load and the load-carrying capacities of the scaffolds used.
36. Each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold must be trained by a competent person to recognize any hazards associated with the work. The training must include the following topics, as applicable:
    - The nature of scaffold hazards.
    - The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in question.
    - The design criteria, maximum intended load-carrying capacity and intended use of the scaffold.

For additional scaffold requirements and information, refer to **OSHA Regulations – Subpart L – Scaffolds (1926.450 – 1926.454)**.

Signs, Signals, and Barricades

1. Signs, signals, and/or barricades will be visible at all times that a hazard exists.
2. Signs, signals, and/or barricades will be removed when a hazard no longer exists.

3. Where the general public is exposed to hazards, all signs, signals, and/or barricades will be checked at the start and finish of the work shift.
4. When signs, signals, and/or barricades are removed for short periods of time, a flagger(s) will be posted until signs, signals, and/or barricades are replaced
5. Prior to placing signs, signals, and/or barricades along highway right of way, the proper authorities will be contacted.
6. Flaggers will wear high visibility warning garments while flagging.
7. Flaggers working at night will wear high visibility reflective material garments.
8. When hand signaling by flagger, a red flag at least 15" square, or a sign paddle will be used. In darkness, a red light will be used.

Stairways

1. A stairway or ladder must be provided at all personnel points of access where there is a break in elevation of **19 inches** or more and no ramp, runway, or sloped embankment is provided.
2. When only one point of access between levels is provided, the access area must be kept clear at all times.
3. All metal pan landings and metal pan treads will be filled with concrete, wood, or other solid materials prior to being used.
4. Stairways having 4 or more risers or rising more than **30 inches**, whichever is less, must be equipped with at least one handrail and one stair rail system along each unprotected side or edge.
5. The height of stair rails will be not less than **36 inches** from the top of the stair rail to the surface of the tread in line with the riser.
6. Handrails that will not be a permanent part of the structure must have a minimum clearance of 3 inches.
7. Midrails must be provided midway between the top of the stair rail system and the stairway steps.
8. Unprotected sides and edges of stairway landings will be protected with guardrail systems.

For additional stairway and ladder requirements and information, refer to **OSHA Regulations – Subpart X – Stairways and Ladders (1926.1050 – 1926.1060)**.

Steel Erection

Steel erection activities include hoisting, laying out, placing, connecting, welding, burning, guying, bracing, bolting, plumbing and rigging structural steel, steel joists and metal buildings; installing metal decking, curtain walls, window walls, siding systems, miscellaneous metals, ornamental iron and similar materials; and moving point-to-point while performing these activities.

Commencement of Steel Erection – A steel erection contractor shall not erect steel unless it has received written notification that the concrete in the footings, piers and walls or the mortar in the masonry piers and walls has attained, on the basis of an appropriate ASTM standard test method of field-cured samples, either 75 percent of the intended minimum compressive design strength or sufficient strength to support the loads imposed during steel erection.

Site Layout – Suburban Construction Management /controlling contractor shall ensure that the following is provided and maintained:

- Adequate access roads into and through the site for the safe delivery and movement of cranes, trucks, other necessary equipment, and the material to be erected and means and methods for pedestrian and vehicular control.
- A firm, properly graded, drained area, readily accessible to the work with adequate space for the safe storage of materials and the safe operation of the erector's equipment.

Pre-planning of Overhead Hoisting Operations – All hoisting operations in steel erection shall be pre-planned to ensure that the all hoisting and rigging requirements are met.

Site-specific Erection Plan – Due to conditions specific to the site, steel erection contractors are required to develop a site-specific steel erection plan that outlines the means and methods that provide employee protection. The site-specific erection plan shall be developed by a qualified person and be available at the work site before erection begins.

Fall Protection – ***Suburban Construction Management requires 100% fall protection over 6 feet.*** Each employee engaged in a steel erection activity, including connectors, who are on a walking/working surface with an unprotected side or edge more than 6 feet above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal fall arrest systems, or fall restraint systems.

For additional steel erection requirements and information, refer to **OSHA Regulations – Subpart R – Steel Erection (1926.750 – 1926.761)**.

Temporary Heating

Temporary heat requirements are an important tool to allow Suburban Construction Management to efficiently work through the colder months. Temporary heat improves working conditions, as well as allows certain construction activities to continue in colder weather. To accomplish these goals, each employee will comply with safety regulations (OSHA 1926.154) in order to assure a risk-free environment from such hazards associated with temporary heating devices. Some of the common hazards are: burns, fires, explosion, carbon monoxide poisoning, and production of oxygen deficient atmospheres.

1. Each temporary heating device will be inspected prior to operation for any signs of damage and also watched closely during initial operation to be sure that it functions properly.
2. Inspect all gas hoses, piping, fittings, and other connections to ensure that they do not have leaks.
3. Make certain there is adequate ventilation where the heater will be used. If a natural supply of fresh air is inadequate, mechanical ventilation will be used.
    - Heaters not suitable for use on wood floors, will not be set directly upon them. If this type heater must be used, it must be set on a suitable heat insulating material.
    - The insulating material must extend beyond the heater 24" or more in all directions.
4. Heaters must be placed at least 10 ft. away from combustible canvas, tarpaulins or similar coverings. (Make sure the covering is securely fastened to prevent hazards caused from extreme wind)
5. Heaters will set horizontally level.
6. Solid fuel (cake, coal, and wood) heating devices are prohibited in buildings, on scaffolds, or within 25 feet of any building or structure.
7. Propane fire heaters will not be used in any below grade application.
8. A competent person will continually monitor and maintain temporary heating equipment.
9. Temporary heat will not be used in any confined space.
10. Temporary heating devices must be installed to provide clearance to combustible materials as described in the following table:

	Minimum Clearance		
Type of Heater	**Sides**	**Rear**	**Chimney Connector**
Circulating Type Room Heater	*12"*	*12"*	*18"*
Radiant Type Room Heater	*36"*	*36"*	*18"*

Welding and Cutting

1. Cylinders should be in an upright position at all times.
2. A cylinder truck with a steadying device will be used while cylinders are in use.
3. Anti-flashback devices are required by Suburban Construction Management and by OSHA on all oxygen- acetylene units. The anti-flashback devices should be installed between the hoses and regulators. Torches that have built-in anti-flashback devices are acceptable.
4. When hoisting cylinders, they will be secured on a cradle, sling board, or pallet. **NEVER** use valve protection cap for lifting of cylinders.
5. Torches will be lighted by friction lighter (Striker). The use of matches, hot work, or butane lighter to light the torch is **FORBIDDEN**.
6. Proper eye protection will be used when welding and cutting. In welding operations, a flash shield will be used when other employees may be exposed to flash and arc burn.
7. Prior to transporting cylinders, gauges will be removed and valve protection caps will be in place.
8. Cylinders containing oxygen or acetylene or other fuel gas will not be taken into confined spaces.
9. Gauges, torches, and hoses will be inspected at the beginning of each work shift. Defective gauges, torches, and hoses will be taken out of service.
10. At a minimum, the first 10 feet of the cable end which the electrode holder is attached, will be free of repairs or splices. All other cable may be spliced or repaired with rubber and friction tape, or other equivalent insulation.

APPENDIX 1

Suburban Construction Management

Employee Discipline Actions for Safety Policy Violations

FIRST SAFETY VIOLATION – *(Verbal)* 1st written warning documented.

Elements

1. Non-Imminent Danger to Life and Health (IDLH) violation
2. Violation contrary to the training and / or New Hire Orientation given by Suburban Construction Management.
3. Violation must occur by choice of employee NOT by management direction.
4. Violation must be reviewed by Superintendent and/or Project Manager to determine level of discipline. (Verbal reprimand by the Superintendent, warning letter into file, suspension, etc.)
5. Superintendent's action to be reviewed by Corporate Management pertaining to Safety Violation.

SECOND SAFETY VIOLATION – 2nd Written Warning / Suspension

Elements

1. Repeat of FIRST VIOLATION or IDLH situation.
2. Violation contrary to training or policies of Suburban Construction Management.
3. Must be reviewed by Superintendent and/or Project Manager to determine level of discipline greater than FIRST SAFETY VIOLATION discipline.
4. Re-training of employee mandatory. (New Hire Orientation as well as task specific training pertinent to SECOND SAFETY VIOLATION.
5. Superintendent's action to be reviewed by Corporate Management pertaining to Safety Violation.

THIRD SAFETY VIOLATION – Termination/Written warning/Suspension

Elements

1. Repeat of SECOND SAFETY VIOLATION or IDLH situation.
2. Violation contrary to training or policies of Suburban Construction Management
3. Superintendent's action to be reviewed by Corporate Management pertaining to Safety Violation and re-evaluate additional training needs if necessary.

APPENDIX 2

Suburban Construction Management

Employee Discipline Report

Job Name: _____ Job Number:_____

The following warning and disciplinary action was issued today and is made part of the personnel file for:

Employee Name: _____

Position: _____ Date: _____

---

1. Offense: _____

_____

2. Facts leading to the warning. Be specific as to date, time, witnesses, and detailed explanation: _____

_____

_____

3. Corrective action to be taken by employee: _____

_____

4. Next disciplinary action that will be taken: _____

_____

5. Comments: _____

_____

Superintendent: _____

Employee: _____

Witness: _____

Date:_____

Send copy to Suburban Construction Management Office

APPENDIX 3.1

Suburban Construction Management

Job Hazard Analysis

Prepared By: _____ Date: _____

Job: _____ Job Duration: From _____ To _____

Job Location: _____

Superintendent: _____ Foreman: _____

Job Description: _____

_____

_____

_____

Tools/Equipment Required for Job: _____

_____

_____

_____

Potential Hazards	PPE and Safety Equipment
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Procedure to Eliminate or Control Hazard

_____

_____

_____

_____

Employees Involved

_____

_____

_____

APPENDIX 3.2

Suburban Construction Management

Job Hazard Analysis

Page:_____ of:_____ Date:_____

Contract Name:_____ Contract #:_____

Contractor:_____ Phase #:_____

Contractor's Representative:_____ Location:_____

ACTIVITY/OPERATION	POTENTIAL UNSAFE CONDITION, ACT OR HAZARD	PREVENTATIVE OR CORRECTIVE ACTION

APPENDIX 4

Suburban Construction Management
Employee Responsibilities

General Safety Rules

1. Practical jokes, horseplay, scuffling or any other conduct that would subject an employee to risk is prohibited.

2. Only safe, approved work methods and procedures will be used. Employees will not take unnecessary risks while performing work activities.

3. Injuries, no matter how minor, will be reported as soon as it is possible.

4. Containers of solvents, sealers, paint thinners or adhesives will be labeled, properly covered and stored in approved areas.

5. Compressed gases will be identified and properly stored in upright positions and will be separated as required.

6. Traffic lanes, aisles, stairways, exits and fire doors will be kept free of slippery substances and kept clear of parts, materials, equipment and rubbish at all times.

7. All extension ladders will be secured when in use.

8. Do not use the two top steps for standing on any stepladder.

9. Ladders must extend 36” above the landing or step off point.

10. Ladders will be free of defects.

11. Stairways, aisles, walkways, breaker panels, firefighting equipment and material storage areas will be kept clear and free from obstruction or debris.

12. Work locations will be kept clean and orderly at all times.

13. Combustible waste, such as oil-soaked rags and waste material, will be disposed of in approved metal containers with tight-fitting metal lids when inside of buildings. Containers will be emptied daily.

14. Flammable liquids, such as gasoline, naphtha, lacquer, thinner, etc., will not be used for general purpose cleaning.

15. Protective gloves, aprons, face shields or glasses should be worn when pouring or handling acids or corrosive solutions.

16. All employees will dress in a manner appropriate to their occupation and the hazards of their job. In the operations area, employees must abide by established uniform codes.

17. Eye protection will be worn by all employees at all times on the job-site. Specific eye protection will be used by employees performing specialized work that creates hazardous conditions for their eyes. Employees will wear chemical goggles when working with chemicals that may be splashed into the eyes.

18. Welding safety gear will be worn at all times. Full leathers, shields, burning goggles are required.

19. There will be no consumption of alcoholic beverages or other intoxicants on Company owned property, on Suburban Construction Management jobsites, or in Company vehicles. The use of alcoholic beverages, narcotics or other intoxicants will be grounds for termination.

20. One hundred percent (100%) fall protection will be used at all times when employees are exposed to a fall over 6 feet. Failure to do so will result in suspension without pay pending an investigation into the circumstances surrounding the incident.

21. All electrical equipment shall be used with GFCIs and in good working condition. Any equipment failing daily electrical inspections shall be repaired or taken out of service.

APPENDIX 5

Suburban Construction Management
Subcontractor's Notice of Safety Violations

Date of Notice:_____ Job Name/Number:_____
Inspection by:_____ Date of Inspection:_____
Firm and Superintendent
Name:_____

Your company is in violation (or needs to review requirements) of the following safety regulation. **IMMEDIATE CORRECTION (or action) IS REQUIRED**. A written response, to the project Superintendent, is required within 5 working days. This notice should be distributed to all applicable parties.

1. [ ] Safety posters /Emergency numbers.
2. [ ] First-aid kit
3. [ ] Hazcom requirements.
4. [ ] House keeping / Clean-up.
5. [ ] Personal protection equipment. (Head, feet, hand, eye, ear, and lung.)
6. [ ] Body harnesses and lanyards.
7. [ ] Fire extinguishers / prevention plan.
8. [ ] Access / egress and illumination.
9. [ ] Flammable liquid / gas storage.
10. [ ] Signs, barricades, and walkways.
11. [ ] Material storage and rigging.
12. [ ] Tools - hand and power.
13. [ ] Powder actuated tools.
14. [ ] Welding and cutting equipment.
15. [ ] Electrical - tools / lock-out.
16. [ ] Electrical - GFCI.
17. [ ] Electrical - cords / wiring.
18. [ ] Scaffolding / railing.
19. [ ] Floor and wall opening.
20. [ ] Crane / hoists.
21. [ ] Aerial lifts / power equipment.
22. [ ] Motor vehicles.
23. [ ] Excavation and trenching
24. [ ] Demolition.
25. [ ] Rollover / overhead protection.
26. [ ] Concrete / steel / masonry
27. [ ] Stairways / ladders.
28. [ ] Other:
29. [ ] Other:

Comments:_____

_____

_____

_____

_____

_____

_____

CC: Subcontractor's Corporate Office, General Superintendent, and Suburban Construction Management Corporate Office.

APPENDIX 6

Suburban Construction Management
Stop Work Order

STOP WORK ORDER

Date:_____
Time:_____

Contractor:_____

Suburban Construction Management Job Name/Number:_____

Description of safety violation(s):

_____

_____

_____

_____

_____

Suburban Construction Management Representative: _____

Subcontractors Representative: _____

CORRECTIVE ACTION TAKEN

_____

_____

_____

START WORK ORDER

Date: _____
Time: _____

Suburban Construction Management Representative:
_____

Subcontractor's Representative: _____

APPENDIX 7.1

Suburban Construction Management

Needs Assessment and Pre-Construction Checklist

The following is a list of items that should be used as a guide during your pre-job planning activities. This list is not comprehensive. Specific job-site activities should be added as necessary.

1. Posting Requirements:

_____ a. Telephone numbers of ambulance, doctor, fire department and/or hospital.
_____ b. Federal requirements.
_____ c. Safety Poster.
_____ d. Crane signal poster. (If applicable)
_____ e. State Requirements.

2. First-Aid and Medical:

_____ a. List of approved doctors or clinics. (Available from corporate office)
_____ b. Well stocked first-aid kit present on job-site.
_____ c. At a minimum, one person on each shift with a valid First-aid/CPR certification.
_____ d. At least one litter capable of lowering an injured person from an elevated work area by crane is on the job-site. (If applicable)

3. Personal Protective Equipment:

_____ a. Adequate supply of hard-hats.
_____ b. Adequate supply of safety glasses.
_____ c. Adequate supply of prescriptive glasses side shields.
_____ d. Full body harnesses for employees.
_____ e. Adequate supply of hearing protection.
_____ f. Gloves/hand protection.
_____ g. Foot guards.

4. Warning and Danger Signs:

_____ a. Hard hat area.
_____ b. First-aid stations.
_____ c. No Smoking.
_____ d. Workman working above.
_____ e. Fire extinguisher.
_____ f. “Right to Know Labels”.
_____ g. Out of order tags.
_____ h. Caution Tape.
_____ I. Do not enter.
_____ j. MSDS location.
_____ k. Overhead electrical lines.

_____ l. First Link Safety Services representative's placard.
_____ m. Eye Protection required.

5. Fall Protection:

_____ a. An adequate supply of guardrails (2x4), posts scaffold post brackets, and plywood to provide protection at slab edges and floor openings.
_____ b. An adequate supply of portable ladders, in good condition and of the right height.
_____ c. An adequate supply of scaffold grade planking.
_____ d. Mobile scaffolding is provided with positive locking casters, guardrails, and a ladder.
_____ e. Adequate body harnesses and lanyards.

6. Falling Material:

_____ a. A safe access route to the work site has or will be provided and may included.
- Covered walkways at entry of multi-story jobs.
- Ramps, stairs, and/or ladders.
- Personnel hoists.

_____ b. A plan has been developed under demo operations that provides for a watchman and warning signs, barricades and/or roping off area.
_____ c. A system has been devised to prevent material from accidentally falling from the building.
_____ d. All personnel that will be designated a “competent person” have had proper training in that particular operation.

7. Employee Training:

_____ a. All employees that are to work at elevations six foot or above have been trained in proper tie-off techniques.
_____ b. All employees who will be using powder actuated tools have a certificate verifying training.
_____ c. All employees who will be operating heavy equipment have been certified, as applicable.
_____ d. All employees who will be operating laser equipment have been trained.
_____ e. All employees who will be operating forklifts have been certified.

8. Electrical:

_____ a. Adequate ground fault circuit interrupters (GFCI) are on site.
_____ b. Extension cords are of proper size, include grounding and are free

of cuts.

_____ c. All power tools are fully grounded or double insulated and will be used with a GFCI.

9. Housekeeping:

_____ a. Trash containers will be provided and emptied frequently.
_____ b. All materials are separated and stacked at proper heights.
_____ c. A trash container is provided for the disposal of drinking cups.

10. Fire prevention:

_____ a. A fire prevention plan has been developed for the job-site.
_____ b. Fire extinguishers are available on the job-site.
_____ c. A fire escape plan has been developed and is posted.

11. Excavations:

_____ a. Adequate shoring is on site.
_____ b. A certified shoring plan is on-site. (If applicable)
_____ c. A competent person has been designated on site.

12. Cranes:

_____ a. A qualified employee has been designated to conduct a daily inspection of the crane.
_____ b. Rigging equipment of the right type and quantity will be provided and inspected daily. Riggers and Signal Persons shall have qualified rigger / signal person training.
_____ c. Controls have been instituted that will prevent any crane from coming in contact with any energized electrical lines.
_____ d. All cranes have a barrier with warning signs to provide protection near the swing radius.
_____ e. Operator has accredited Crane Training.
_____ f. Copy of the annual inspection is in the crane and on file.
_____ g. Crane has safety belt, fire extinguisher and crane signal poster.

13. Anticipated Hazards:

_____ a. Pictures have been taken of existing building conditions.
_____ b. Pictures have been taken of surrounding area i.e. streets, businesses, buildings, houses, wells, ponds, and vegetation.
_____ c. Checks have been made for asbestos, lead and other possible hazardous substances.

14. Miscellaneous:

_____ a. Drawings and plans showing all form work details will be available on the job-site.
_____ b. Drawings and plans for outrigger scaffolds are on the job-site.

____ c. Certified copies of shoring plans are on the job-site.
____ d. Arrangements have been made for site lighting. (If applicable)
____ e. Arrangements have been made for adequate supply of drinking water and toilet facilities.

Job Name: _____ **Job Number:** _____

Foreman: _____ **Date:** _____

Superintendent: _____ **Date:** _____

Project Manager: _____ **Date:** _____

Vice President: _____ **Date:** _____

Send a completed copy within 30 days after job start-up to the Suburban Construction Management Corporate Office.

APPENDIX 7.2

Suburban Construction Management

Scaffolding Inspection Checklist

SCAFFOLDING INSPECTION CHECK LIST (1926.451)	Yes	No
Has scaffold been constructed to maintain a safety factor of 4 to 1? (a 1)		
Has scaffold been designed by a qualified person? (a 6)		
Has scaffold platform been fully planked with less than 1" gaps between planks?(b1i)		
Is the gap between the last plank and the uprights less than 9.5"? (b 1 ii)		
Are all platforms at least 18" wide? (b 2) If not are employees protected with fall protection?		
Are open sides of scaffold less than 14" from face of work (18" for plastering / lathing)? (b 3) If not are employees protected with fall protection equipment?		
Are all platform units cleated, restrained by hooks or extend over support by 6"?		
Are platforms of 10 feet or less extending over their end supports no more than 12" or have guardrails to block access to overhang?		
Where platforms of 10 feet or more extending over their supports no more than 18" or have guardrails to block access to overhang?		
Are abutted planks resting on separate support surfaces? (b 6)		
Are planks overlapped over their supports, 12" over each other or nailed/secured?		
Are planks that rest on the bearer at other than a 90 degree angle laid first? (b 8)		
Are the top and bottom surfaces of the plank free of paint and opaque finishes?		
Has competent person approved the use of components from different manufactures		
Scaffolds higher than the 4:1 height to base ratio secured from horizontal member?		
Has the first vertical tie been installed at a height less than 4 x the base dimension?		
Have vertical ties been repeated every 20' for scaffolds 3' or less in width or 26' for scaffolds wider than 3' and extra ties installed to counteract eccentric loads?		
Is the vertical distance from the top tie to the top of the scaffolding less than 4:1?		
Are scaffolds erected on adequate, firm footings (no unstable objects or settled)?		
Is scaffold plumb and braced?		
Has safe access been provided at more or less than 2' (No climbing cross braces)?		
Do all portable ladders meet 1926 Subpart X standards and positioned safely?		
Bottom rung less than 2' above the supporting surface and rest platforms every 35'?		
If ladder is built into end frames: was the frame designed to be used for access? Are the rungs at least 8" in length, uniformly spaced and no more than 16 ¾" between rungs? Do the rungs and steps of the ladder line up directly with rest docks (35')?		
Direct access from other structures prohibited at >24"vertically or >14" horizontally?		
Are scaffolds and components loaded within their rated capacities?		
Have the use of lean to or shore scaffolds been prohibited?		
Has the scaffold been inspected by a competent person every work shift?		

Have damaged parts been repaired replaced or removed as required?		
Has the movement of occupied scaffold been prohibited?		
Are slippery conditions removed as soon as possible?		
Are tag lines used to control loads onto or near scaffolds?		
If storms and high winds are present has the competent person been consulted and wind screens or personal fall arrest systems used?		
Are tools, material, and debris removed from scaffold to prevent accumulation?		
Has the use of makeshift devices and ladders to increase the working level height been prohibited? (check 1926.451 (f)(15)(I,ii,iii, and iv)?		
Have provisions to prevent platforms from deflecting more than 1/60th of the span been made?		
Are guardrails (38-45" high) used on all scaffold over 10 feet or PFAS where guardrails aren't feasible? Are they installed on the working side at more than 14"?		
When mesh or screens are installed do they extend from the top of the guardrail to the platform?		
Will the guardrails withstand 200 lbs in a downward or outward direction?		
Have toe boards (>3 ½ ") screens, or barricaded area below been installed?		
Tube and Coupler Scaffold		
Is "X" bracing installed on the ends of the scaffold and every third set of posts horizontally and every fourth runner vertically?		
Are ties installed at the bearer level?		
Is longitudinal bracing installed at a 45 degree angle on both faces of the scaffold?		
Does the longitudinal bracing extend from both end posts to the extreme top of the scaffold?		
If the scaffold is longer than 5 posts, is a new line of bracing begun at every fifth post?		
Is bracing installed as close to the node point as possible?		
Are the bearers attached to both posts and does the inboard coupler rest on the runner coupler?		
If bearers are attached to the runners is the bearer as close as possible to the posts?		
Do the ends of the bearer tube have full contact with the clamp?		
Are runners installed on the inside and outside of the scaffold at level heights?		
If outside runners are left out, are there midrails and guardrails above and below where the runner would have been?		
Are runners interlocked and coupled to each post?		
Are the bottom runners as close to the base as possible?		
Do light and medium duty scaffolds have posts, runners, bearers, and braces of 2" O.D. steel tubing?		
Are posts on light-duty scaffolds spaced no more than 4' apart by 10 along the length of the scaffold?		
Are posts on medium-duty scaffolds spaced no more than 4' apart by 7' along the length of the scaffold?		

Is the maximum vertical runner spacing of 6’6”?		
If the maximum number of planked levels, working levels, or height exceed those shown in table b, are drawings done by a registered professional engineer?		
Fabricated Frame Scaffold		
Are frames secured by braces which secure the vertical members laterally?		
Do braces automatically square and align the frames and are all brace connections secured?		
Are frames joined together by coupling pins or equivalent means?		
Are frames locked together where uplift can occur?		
Has the use of side brackets and their impact on the overall scaffold been fully evaluated?		
Have scaffolds over 125’ in height been constructed and loaded according to a registered professional engineer?		
Mobile Scaffold		
Are casters locked during use?		
Is the manual force used to move the scaffold applied as close to the base as possible?		
Are scaffolds stabilized to prevent tipping over during movement?		
Are casters pinned into the frames or adjustment screws?		
If rolling scaffolds are being moved with employees on board are all criteria of 452(W) being met?		

APPENDIX 8

Suburban Construction Management
Employee Orientation

A. Purpose: Orientation of new employees, re-hires, part-time employees and those transferred from another facility within Suburban Construction Management, will begin the first day of employment on the new job. This program will provide an introduction of Suburban Construction Management policies and rules and will include a thorough safety briefing. The orientation should include a tour of the facilities to acquaint the employee with the entire operation. The employee should also be advised how his/her job is important to the total operation.

B. Procedure: The immediate Superintendent of the employee will thoroughly instruct him/her in job safety requirements. A Safety Orientation checklist follows. The checklist must be completed by checking each item as it is covered, signing by the Superintendent and employee and returning it to the corporate office for placement into the employee's file. The employee responsibility list contained in Appendix 1 will also be reviewed with the employee by the Superintendent.

C. All new employees will be given training prior to actually working on site at a project. This training will be a hands-on explanation of the Corporate Safety Program as well as any specific production training needed for the safe completion of a task.

Suburban Construction Management

Employee Orientation Checklist

EMPLOYEE'S NAME _____

JOB ASSIGNMENT _____ DATE HIRED _____

Circle One: New Employee Transfer Re-Hire Part-Time

[ ] 1. Purpose of orientation.

[ ] 2. Report accidents to Superintendent immediately.

[ ] 3. First Aid.
- A. Obtaining treatment.
- B. Location of facilities.
- C. Location and names of trained first aid personnel.

[ ] 4. Potential hazards on the job and in the Department.
- A. What they are.
- B. How to use safely.
- C. Care and use of personal protective equipment.

[ ] 5. What to do in event of emergencies.
- A. Exit locations and evacuation routes.
- B. Use of firefighting equipment (extinguishers, hoses).
- C. Specific procedures (medical, chemical, fire, etc.).

[ ] 6. The total safety program.
- A. Function of Safety Committees and meetings.
- B. Introduce to Safety Committee representative.
- C. Safety policy and rules and their value.
- D. Read and understands the safety rules in Appendix 4 – Employee Responsibilities

[ ] 7. Personal work habits.
- A. Proper lifting techniques.
- B. Horseplay, good housekeeping, smoking policy.
- C. Safe work procedure.

[ ] 8. Vehicle safety.

I have instructed this employee on the items checked and believe he/she can perform assigned duties safely.

Date _____ Superintendent _____ Employee _____

APPENDIX 9.1

Suburban Construction Management
Emergency Procedures

1. Establish procedures for the sounding of alarms.

2. The alarms will be capable of being perceived above ambient noise or light levels by all employees in the affected portions of the workplace.

3. The alarms will be distinctive and recognizable as signals to evacuate the work area or to perform actions designated under the disaster plan.

4. The alarm system will be maintained in operating condition except when undergoing repairs or maintenance. A back up alarm, such as employee runners or telephones, will be provided when systems are out of service.

5. Fire protection equipment will be properly located and mounted at all times.

6. Employees will be familiar with both location and operation of all fire protection equipment and systems in the vicinity of their work area.

7. Only ABC type extinguishers are to be used.

8. Establish emergency escape procedures and escape route assignments.

9. Establish procedures to be followed by employees who remain to operate critical department operations before they evacuate.

10. Establish procedures to account for all employees after evacuation has been completed.

11. Designate refuges or safe areas that will provide sufficient space to accommodate the employees during evacuation and for necessary first aid treatment.

APPENDIX 9.2

Suburban Construction Management

Emergency Evacuation Plan

NOTICE

Emergency Evacuation Plan

READ THIS NOTICE

Jobsite Name: _____

Jobsite Address: _____

These are general emergency response procedures

1. Call 911 to summon local emergency units.
2. Alert fellow workers
3. Alert site office personnel: _____
4. Evacuate the building in an orderly manner
5. Assemble in groups to a safe holding area
6. Remain in holding area until a head count is taken

Holding Area is at Suburban Construction Management Job Trailer Entrance

REPORT ANY MISSING EMPLOYEE TO EMERGENCY PERSONNEL IMMEDIATELY

Employees are strictly forbidden to re-enter an evacuated building site until the all clear is given by emergency response personnel and an authorized supervisor.

In the Event of an Emergency please call 911

Safety Consultant – Brent Smith - First Link Safety – (208) 861-2708
Dig line – 811
Idaho Power – (208) 388-2323
Intermountain Gas – (877) 777-7442
United Water – (208) 362-1700

APPENDIX 9.3

Suburban Construction Management

Fire Extinguisher Safety

Choosing to evacuate the workplace rather than providing fire extinguishers for employee use will most effectively minimize the potential of fire-related injuries. Additionally, training employees to use and maintain portable fire extinguishers requires considerable resources. On the other hand, you will want to consider the availability of a public fire department and the time it may take to respond as well as the vulnerability of egress routes when you're making a policy decision on this issue.

Risk Assessment

Prior to fighting any fire with a portable fire extinguisher, those involved must perform a risk assessment that evaluates the size of the fire, the evacuation route the fire extinguisher users will use and the atmosphere in vicinity of the fire.

Characteristics of fires that CAN BE extinguished with portable fire extinguishers:	**Characteristics of fires that SHOULD NOT be extinguished with portable fire extinguishers:**
• The fire is limited to the original materials ignited • It is contained in a wastebasket or other receptacle • The flames are no higher than the fire fighter's head • The fire has not depleted the oxygen in the room • Heat is being generated but the room temperature is only slightly increased • Smoke may be accumulated on the ceiling but visibility is good • There is a clear evacuation path behind the fire fighter as he uses the extinguisher	• The fire involves flammable solvents and has spread over more than 60 square feet • It cannot be reached from a standing position • It is partially hidden behind a wall or ceiling • The fire cannot be fought without respiratory protection • The radiated heat is easily felt on exposed skin making it difficult to approach to within 10-15 feet of the fire • Smoke is filling the room very quickly decreasing visibility • Fire, heat or smoke may block the evacuation path

Do you know how to extinguish a fire? According to OSHA regulations, no one at a workplace should use a fire extinguisher unless they have been trained to do so. Though this may seem restrictive, there are several good reasons for this rule. If an untrained person tries to extinguish a blaze, some serious mistakes can happen. Any of these mistakes can cause the fire to become worse, or injure or kill the individual. This week's Toolbox Talk features instructions on proper use of portable fire extinguishers.

There are four things to remember when it comes to using a fire extinguisher: **Use Your Judgment, Communicate, Ready the Extinguisher,** and **Use It**. You must also know what to do if your efforts fail.

Use Your Judgment --When you see smoke or fire you should use your own good judgment before you decide to extinguish the blaze. Ask yourself these questions:

- Is the fire limited in size and spread?
- Will you have an escape route if something goes wrong?
- Do you know the location of the nearest fire extinguisher?
- If you are confident the fire is controllable and your safety is ensured, attempt to put it out. If the answer to any of these questions is *no*, evacuate the area immediately.

Communicate -- Once you have decided to extinguish the blaze, make every reasonable attempt to tell at least one other person what you are doing. This person should report your activity to someone else as soon as possible.

Ready the Extinguisher --You must select the proper extinguisher. Fire extinguishers are classified according to the type of fires they extinguish. It is very important to use the proper extinguisher. Some extinguishers are rated for more than one class. Some are for only one type of fire. Just be sure the extinguisher you're using is rated for the fire you're extinguishing.

- Class A: Use on ordinary combustibles such as wood, cloth, paper, rubber, and many plastics.
- Class B: Use on flammable liquids such as gasoline, oil, grease, tar, oil-based paint, lacquer, and flammable paint.
- Class C: Use on energized electrical equipment including wiring, fuse boxes, circuit breakers, machinery, and appliances.
- Class D: Use on flammable solids such as magnesium.

- Quickly but carefully remove the extinguisher from its mounting bracket. It may be heavy, so use caution when lifting it.
- Stand about six feet from the fire.
- Extend the nozzle toward the fire.
-

Use It --Once the extinguisher is ready, you are ready to release the extinguishing agent. This must be done properly. For example, if you squeeze the handle before you have aimed the nozzle properly, valuable time and extinguishing agent will be wasted.

A technique to remember for using an extinguisher is published by the National Fire Protection Association (NFPA). It is known as the **P.A.S.S.** *Technique*.
The **P.A.S.S.** Technique:

Pull out the pin that secures the handle.
Aim the extinguisher nozzle at the base of the fire.
Squeeze the handle. (Do not be startled by the noise or velocity of the agent as it is released.)
Sweep the agent stream from side to side across the base of the fire until it is completely out. Be alert for re-ignition. If this happens, douse the fire until the extinguisher is empty.

Once the fire is out, back carefully away from the scene. This will enable you to know immediately if the fire re-ignites. Knowing how to use a fire extinguisher the right way is an important skill. Sometimes, though, in spite of your best efforts, your attempt may fail. The last point to remember about using a fire extinguisher is what to do if your efforts fail. It is really quite simple. If you cannot extinguish the blaze or it recurs repeatedly, **evacuate the area immediately**.

Inspection

Make sure your extinguishers have been properly inspected.

Monthly: Have someone at your company who has been designated to inspect and initial the tag on the extinguisher every month. Look for damage to the extinguisher including dents, damage to gauge, reading of the gauge, pin in place, cracks or damage to hose, no obstructions around the extinguisher, etc.
Yearly: The employer shall assure that portable fire extinguishers are subjected to an annual maintenance check. Stored pressure extinguishers do not require an internal examination. The employer shall record the annual maintenance date and retain this record for one year after the last entry or the life of the shell, whichever is less. The record shall be available to the Assistant Secretary upon request.
In addition to an external visual examination, the employer shall assure that an internal examination of cylinders and shells to be tested is made prior to the **hydrostatic tests**.

TABLE L-1

Type of extinguishers	Hydrostatic Test interval (years)
Soda acid (soldered brass shells) (until 1/1/82)	(1)
Soda acid (stainless steel shell)	5
Cartridge operated water and/or antifreeze	5
Stored pressure water and/or antifreeze	5
Wetting agent	5
Foam (soldered brass shells) (until 1/1/82)	(1)
Foam (stainless steel shell)	5
Aqueous Film Forming foam (AFFF)	5
Loaded stream	5
Dry chemical with stainless steel	5
Carbon Dioxide	5
Dry chemical, stored pressure, with mild steel, brazed brass or aluminum shells	12
Dry chemical, cartridge or cylinder operated, with mild steel shells	12
Halon 1211	12
Halon 1301	12
Dry powder, cartridge or cylinder operated with mild steel shells	12

[1]Extinguishers having shells constructed of copper or brass joined by soft solder or rivets shall not be hydrostatically tested and shall be removed from service by January 1, 1982. (Not permitted)

APPENDIX 10

Suburban Construction Management
Safety Bulletin Board

A. Purpose: In addition to the methods defined below, the bulletin board is another method to increase employees' awareness of safety and health and communicate management's safety message.

B. Procedure: The following consideration should be made for bulletin board effectiveness:

1. Placed in a spot where there is greatest employee exposure (lunchroom, break room, job trailer, near time clock, etc.)
2. Posting should be neatly arranged.
3. Posters, Safety Committee minutes and other information that becomes dated or worn should be changed periodically.
4. A specific safety bulletin board or portion of an existing board should be designated and that spot reserved **EXCLUSIVELY** for safety material.
5. **The superintendent** is responsible for maintaining the bulletin board as recommended above.

C. The following items are required to be posted:

1. Employer /Employee notifications
2. Safety bulletins and posters.
3. Emergency telephone numbers.
4. Evacuation layout drawing.
5. Accident Procedures
6. Changes in operations (processes/hazards) as applicable.
7. Names of employees First Aid trained and certified.
8. Any inspection reports by OSHA /State Compliance officers.
9. State Workman's Compensation Compliance poster.
10. OSHA 300A Summary (February 1st – April 30th).
11. First Link Safety Services representative placard.

To print the required OSHA Posters, please go to the links below!

http://labor.idaho.gov/ftp/requiredposters.pdf

http://www.dol.gov/vets/programs/userra/USERRA_Private.pdf

APPENDIX 11.1

Suburban Construction Management
Accident Procedures

A. Definition and Purpose: ALL ACCIDENTS that may or may not involve personal injury, no matter how minor, will be reported PROMPTLY to:
   a. The immediate Superintendent
   b. Suburban Construction Management Corporate office
   c. First Link Safety

An accident or injury investigation and evaluation are required (refer to appendix 12.1 or 12.2). Every accident includes a sequence of contributing causes. By eliminating the first event, it is possible to avoid a repeat performance of an accident. The removal of a single cause can prevent a recurrence. During the Superintendent's evaluation, he/she must determine the possible consequences that could take place if the situation is not corrected and take appropriate action based upon those findings (i.e., investigate, report, correct, etc.).

B. Medical Emergency Procedure:

The telephone number of emergency services will be posted near the phone and on the safety bulletin board**.** A Suburban Construction Management official or designee will accompany the employee to the doctor or hospital. A post accident drug screen will be performed as soon as medically possible.

C. Documentation Procedures:

1. MINOR INJURIES (requiring designated doctor/outpatient care – **use the designated physicians listed in appendix 11.2**)

   After the emergency actions following an accident, an investigation of the accident (refer to Appendix 12.1) will be conducted by the immediate Supervisor in conjunction with any witnesses to the accident, to determine the causes. The findings of the investigation will be documented on an accident investigation form. Distribution of the completed form will be as follows:

   a. Copy to the Superintendent.
   b. Copy to Corporate Management.
   c. Copy to First Link Safety

2. MAJOR INJURIES (fatality or multiple hospitalization – **use 911 service to closest emergency care center**)

   a. Superintendent, Corporate Management and First Link Safety are

to be notified immediately. An investigation under the direction of management will be conducted. Corporate Management and the Superintendent of the injured person(s) will be included in the inspection party. The corporate office should be contacted within the hour of the incident.

NOTE: Any equipment involved in an accident resulting in an immediate fatality is not to be moved until a representative of OSHA investigates the accident and authorizes removal. If, however, it is necessary to move the equipment to prevent further accidents or to remove the victim, the equipment may be moved as required.

3. NEAR-MISS (likelihood of personal injury or property damage)

To the greatest extent possible, all "near-miss" accidents will be investigated by Corporate Management (if situation warrants), and the Superintendent. Documentation will be made on the firm's accident investigation form. A near-miss accident is defined as an unplanned event where damage resulted to equipment but there was no personal injury to employees OR where damage did not result but the likelihood of personal injury to the employee was great. If the conditions that permitted the near miss or "close-call" to exist are not eliminated, they will continue to be available to cause additional accidents that could eventually result in personal injury to the employee.

Aids to Accident Investigation should include the following:

- Camera equipment
- First aid kit
- Tape recorder
- Gloves
- Tape measure
- Large envelopes
- High visibility tape (barrier)
- Emergency Phone Numbers
- Clipboard, pen and graph paper
- Injury Report forms
- Scissors
- Scotch tape
- Sample containers with labels
- Personal protective equipment
- Flashlight
- Tags for labeling

APPENDIX 11.2
Suburban Construction Management
Designated Occupational Health Providers

Boise/Caldwell/Nampa – St. Luke's Occupational Health Services, Dr. Brian Johns & Dr. Cody Heiner, Occupational Health Specialists. Hours: 8-5 M-F, 703 Americana Blvd. Suite 130, Boise 83702, (208)706-7500. After hours: St. Luke's Emergency Room, downtown Boise.

Burley/Cassia /Rupert - Cassia Hospital: OH services through the Emergency Dept. Contact Eddie Lopez, 1501 Hiland Avenue, Burley ID 83318 (208)678-4444.

Coeur d'Alene – *Kootenai Urgent Care*, OH, 700 Ironwood Drive Suite 170E, Coeur d'Alene ID 83814, (208)676-1852, or *Kootenai Hospital* – Occupational Health Clinic, Ste 310, 2003 Lincoln Way, Coeur d'Alene, ID 83814, Contact: Jill Sabrowski (208)666-3906.

Eagle - St. Luke's Urgent Care (for after hours care) 3101 E State St., Eagle ID83616. (208)473-3100.

Fruitland, ID/Ontario OR - St. Luke's Clinic, 1210 NW 16th St., Fruitland ID 83619. (208)452-8600.

Hailey - St. Luke's Family Medicine, (208)788-3434,706 S. Main St., Hailey ID 83333, Will provide walk-in injury care, Contact Renee Sussman.

Hayden - Kootenai Urgent Care, 566 West Prairie Avenue Coeur d'Alene ID 83815, (208)772-9110.

Hood River, Oregon – Providence Health & Services Occupational Health Center, 1790 May Street, Hood River, OR 97031, (541)387-6383.

Idaho Falls - Eastern Idaho Regional Medical Center, 3100 Channing Way, Idaho Falls ID 83404, Day time - Carrie Duncan (208)529-6311 or (208)529-6305 (employee health) will refer you to one of five Family Medicine Doctors. After hours - use Emergency Room (There are no OH MD's)

Lewiston - St. Joseph Regional Medical Center, 415 6th, Lewiston ID (208)743-2511.

Boise – St. Luke's Occupational Health Services, Dr. Brian Johns & Dr. Heiner, OH, Hours 8-5 M-F, St. Luke's Boise Medical Office Bldg., 520 S. Eagle Road, Suite 2213, Boise 83642. (208)706-5447. After hours: St. Luke's Boise Emergency Room.

Pocatello - Dr. James Collet, Board Certified in Occupational Health, at WorkMed at Portneuf Medical Center, (208)239-1014 or (208)237-3878, location 880 W Quinn Rd., Chubbock ID 83204. Chris Yensen.

Post Falls - Kootenai Urgent Care, 1300 E Mullan Ave., Suite 600, Post Falls ID 83854, (208)777-1157.

Sandpoint - North Idaho Medical Care, 30544 Hwy 200 Suite 101, Ponderay ID 83852, (208)263-6300.

Twin Falls - St Luke's Magic Valley Occupational Health Clinic - Dr. Johns & Dr. Stagg, Occupational Health Drs., Contact Bonnie Williams-Adams to set up account, (208)737-2905. Brent Evens coordinates drug testing (208)308-2048 .

Wood River - St. Luke's Wood River Emergency Room and Wood River Internal Medicine. Contact Dr. Royal McClure (208)727-8800 at 100 Hospital Dr. Ste. 201 by, Ketchum ID 83340 appointment for injury care.

APPENDIX 12.1

Suburban Construction Management

Injury Report

Time of Accident: _____ Date Reported: _____

Date of Accident: _____ Project Name/#: _____

1. Name: _____ **Time employee began work:** _____
2. Age: _____ Sex: _____
3. Job Title: _____
4. Date/Time loss began: _____
5. Date of hire: _____
6. Job at time of accident: _____
7. Length of time on job: _____
8. Specific body part(s) affected: _____
9. Type of injury: (Puncture, sprain, etc.) _____
10. Was first-aid required? Yes No
11. Lost time involved? Yes No
12. Property damage? Yes No
13. How did accident occur? _____
_____
_____
14. Was personal protective equipment needed? Yes No
15. Was protective equipment used? Yes No

16. Describe damage: _____
_____
_____

17. What unsafe acts contributed to the accident? _____
_____
_____

18. Corrective action to be taken for unsafe acts: (Discipline, Training, etc.) ____
_____
_____

19. What unsafe conditions contributed to the accident? _____
_____
_____

20. Had the condition been reported previously? Yes No

21. Who was the condition reported to? _____

22. Was the accident caused by anyone not employed by Suburban Construction Management? Yes No

23. Who? _____

24. Witnesses: _____
_____
(Attach a written statement from witnesses)

25. Corrective actions for unsafe acts: _____
_____
_____

26. Actions to prevent accident recurrence: _____
_____
_____

27. Person responsible for corrective action: _____

28. Dates to have corrective actions completed:

_____ _____
Superintendent Date

Forward copy to Suburban Construction Management Corporate Office

APPENDIX 12.2

Suburban Construction Management

Near Miss Report

DATE_____ TIME OF INCIDENT_____ FACILITY_____

LOCATION WHERE NEAR MISS OCCURRED:_____

_____

DESCRIPTION OF EVENT: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

CORRECTIVE ACTION:_____

_____

_____

_____

_____

_____

_____

EMPLOYEE NAME (PRINT)

_____

EMPLOYEE SIGNATURE/DATE

_____

MANAGER SIGNATURE/DATE

_____

SAFETY OFFICER SIGNATURE/DATE

APPENDIX 13

Suburban Construction Management

Occupational Injury and Illness Record Keeping

A. Purpose: In accordance with applicable requirement of the OSHA standards, corporate management will ensure the appropriate records are kept as follows:

1. Maintain a Log and Summary of Occupational Injuries and Illness on OSHA 300 form. Recordable cases include:

   a) Every occupational death.

   b) Every occupational illness.

   c) Every occupational injury that involves:

      - Unconsciousness;
      - Inability to perform all phases of the regular job;
      - Inability to work full time on a regular job;
      - Temporary assignments to another job;
      - Medical treatment OTHER than first aid.

2. Keep copies of all reports generated when an employee is injured on the job.

3. From February 1st to April 30th, post the completed Summary portion of the OSHA 300 for the previous year.

4. Maintain records for five years following the year to which they relate.

5. Enter each recordable injury and illness on the log as early as practicable, but no later than six working days after receiving the information that a recordable case has occurred.

6. Copies of the OSHA 300A Summary & Logs are to be provided to each job location.

B. Responsibility: The individual or function responsible for maintaining records and ensuring proper posting is the Superintendent of the project.

APPENDIX 14

Suburban Construction Management

OSHA Inspection Form

1. Who did the inspector first contact on the job-site?

Name:_____ Position:_____

2. Did the inspector talk with workers/other personnel before showing his/her credentials? Yes_____ No_____

3. Did the inspector take any pictures before he/she arrived and introduced himself/herself? Yes_____ No_____

4. Were other company's personnel working at the job-site, and did the inspector ask for them to be present at the opening conference? Yes_____ No_____

5. Name the other companies inspected and whether subcontractors, vendors, or others: _____
_____
_____
_____

6. Who was present at the opening conference? (Include those in 5 above if they were present): _____
_____
_____
_____

7. What was the purpose of the visit as explained by the inspector?
_____
_____
_____
_____
_____

8. Was there a complaint? _____
_____

9. Were you given a copy of the complaint? Yes _____ No _____

10. Did the inspector review record keeping under OSHA?

Yes _____ No _____

11. How were employee representatives selected? _____
_____

12. What trades did they represent? _____
_____
_____

13. Other Comments: _____
_____
_____

14. Who was present during the actual site inspection? _____
_____
_____
_____

15. Was the employee paid for the time spent? Yes _____ No _____

16. Comments by the inspector? Briefly list them. _____
_____
_____
_____
_____

17. Were pictures taken? Yes _____ No _____.

Write down exact locations and of what? _____
_____
_____

18. Was any portion of the job shut down? Yes _____ No _____

If “Yes”, for how long?
_____
Comments: _____
_____

19. Who was present at the closing conference? _____
_____
_____
_____

20. Did the inspector allege that violations where found? Yes ____ No ____

21. If yes, name them:

SERIOUS:

_____
_____
_____
_____
_____

OTHER-THAN-SERIOUS:

_____
_____
_____
_____
_____

COMMENTS:

_____
_____
_____
_____
_____

TIME SCHEDULE OF INSPECTION

Date inspector arrived: _____ Time inspector arrived: _____
Time opening conference began: _____
Time opening conference ended: _____
Time inspection began: _____
Time inspection ended: _____
Time closing conference began: _____
Time closing conference ended: _____

Site location: _____
Signed: _____
Date: _____

APPENDIX 15.1

Suburban Construction Management

Hazardous Communication Written Program

The hazard communication standard is a law enacted by OSHA to protect workers against chemical exposures at the workplace. The intent of this law is to reduce health risks by use of safety equipment, training and informing employees of the potential hazards.

This program has been prepared to comply with the requirements of the Federal OSHA standard 1926.59 and 1910.1200, and to ensure that information necessary for the safe use, handling and storage of hazardous chemicals is provided to and made available to employers and employees.

Information on Suburban Construction Management Hazardous Communication Written Program or on a specific SDS can be obtained by contacting the job Superintendent or by contacting the corporate office in **Boise**, Idaho.

This program includes guidelines on identification of chemical hazards and the preparation and proper use of container labels, placards and other types of warning devices,

The four basic requirements of the hazard communication standard are:

1. All containers are labeled to identify the product that it contains. The integrity of labels on original containers is to be maintained. This includes secondary containers. Secondary containers are to have appropriate labels that include product identification and hazard warnings.
2. Safety Data Sheets (SDSs) are available for all products used in the workplace. The SDS should be provided to the Suburban Construction Management Superintendent a minimum of 2 weeks prior to any work with the product on the project.
3. Employees are informed and trained on the standard.
4. Employees have been furnished with and trained in the use of personal protective equipment (PPE) required for use in the event that they are exposed to a potentially hazardous product.

Chemical Inventory

Suburban Construction Management maintains an inventory of all known chemicals in use on this work site. A chemical inventory is available from the Project Superintendent. Hazardous chemicals brought onto the work site by Suburban Construction Management will be included on the hazardous chemical inventory list.

It is the responsibility of each Suburban Construction Management subcontractor to work within the OSHA guidelines. Each contractor is responsible for the protection of its employees and compliance with the standard. In addition, it is the responsibility of the subcontractor to maintain its own inventory of chemicals on the Suburban Construction

Management project site. The complete and updated listing must also be supplied to the Suburban Construction Management Project Superintendent or Project Manager.

Container Labeling

1. All chemicals on site will be stored in their original or approved containers with a proper label attached, except small quantities for immediate use. Any container not properly labeled will be given to the Project Superintendent for labeling or proper disposal.
2. Workers may place a chemical into a smaller (one gallon or less) container. This container is for immediate use. Any chemical remaining after work is completed must be returned to the original container or to the Project Superintendent for proper handling.
3. No unmarked containers of any size are to be left in the work area unattended.
4. Suburban Construction Management will rely on the manufacturer and or supplier applied labels whenever possible, and project staff will ensure that these labels are maintained. Containers that are not labeled or on which the manufacturer's label has been removed will be re-labeled or removed from the site.
5. Suburban Construction Management will ensure that each container is labeled with the identity of the hazardous chemical contained and any appropriate hazard warnings.

Safety Data Sheets

1. Employees working with hazardous chemicals may request a copy of the Safety Data Sheet (SDS). Requests to review a SDS should be made to the Project Superintendent. The SDS must be available to the employee within one (normal) work day shift.
2. SDSs should be available on the site. The standard chemical reference may also be available on the site to provide immediate reference to chemical safety information.
3. All subcontractors have the responsibility to maintain their own inventory of chemicals being used on the Suburban Construction Management project site. The complete and updated listing must also be supplied to the Suburban Construction Management Project Superintendent or Project Manager, for inclusion in the project SDS binder(s).

Employee Training

Employees will be trained to work safely with hazardous chemicals that they may encounter. Employee training will include:

1. Location of written hazard communication program, SDS binder, and review of index
2. Hazardous chemicals in the workplace
3. Methods that may be used to detect a release of a hazardous chemical(s) in the work place.

4. Symptoms of overexposure
5. Procedures to follow if employees are overexposed to hazardous chemicals.
6. Physical and health hazards associated with chemicals including HCS Pictograms, Hazard Statements, and Signal Words
7. Protective measures to be taken.
8. Safe work practices, emergency responses and use of personal protective equipment.
9. How to reduce or prevent exposures to hazardous chemicals through the use of control procedures, work practices, and personal protective equipment.
10. Steps the company has taken to reduce or prevent exposure to hazardous chemicals.
11. Information on the Hazardous Communication Standard including:
    - Labeling and warning systems.
    - An explanation of Safety Data Sheets.

Personal Protective Equipment (PPE)

Required PPE is available from the Project Superintendent. Any employee found in violation of PPE requirements may be subject to disciplinary actions up to and including dismissal.

Emergency Response

1. Any incident of over exposure or spill of a hazardous chemical/substance must be reported to the Project Superintendent immediately.
2. The foreman and/or the Superintendent will be responsible for insuring that proper emergency response actions are taken to care for the employee or respond to leak/spill situations.

Hazards of Non-Routine Tasks

1. Superintendents will inform employees of any special tasks that may arise that could involve possible exposure to hazardous chemicals.
2. Review of safe work procedures and use of required PPE will be conducted prior to the start of any confined space tasks.
3. Where necessary, confined and hazardous atmosphere areas will be posted to indicate the nature of the hazards involved.

Informing Other Employers

1. Other on-site employers are required to adhere to the provisions of the Hazard Communication Standard.
2. Information of hazardous chemicals known to be present will be exchanged with other employers during the pre-construction meeting. Employers will be responsible for providing necessary information to their employees.
3. Other on site employers will be provided with a copy of the Suburban Construction Management Hazard Communication Program.
4. Suburban Construction Management will supply a central location for SDS, so all

employees of all contractors on a specific project (when Suburban Construction Management is the general contractor) will have access. This location will be made known to all workers on the site.

Posting

Suburban Construction Management has posted information for employees at this job site concerning the Hazard Communication Standard. This information can be found at the project office.

APPENDIX 15.2

Suburban Construction Management
List of Hazardous Chemicals

UPC Code	Trade Name	Chemical Hazard	Location

APPENDIX 16

Suburban Construction Management

Employee Chemical Hazard Communication Training Acknowledgment

I, _____, have attended Suburban Construction Management Chemical Hazard Communication Training orientation, and understand the requirements and responsibilities of the Hazcom program.

_____
Employee's Signature

_____
Today's Date

_____
Project Manager or Superintendent's Signature

_____
Today's Date

APPENDIX 17

Suburban Construction Management

Hot work

Contractor: _____ Date: _____
Project: _____
Work Location: (Be Specific) _____
Individual available on site who is responsible to monitor employee safety and implementation of this plan: _____

ATTENTION

Before approval of any hot work plan, A Suburban Construction Management representative will inspect the work area and confirm that precautions have been taken to prevent fire in accordance with NFP.A No 51B.

PRECAUTIONS:

1. Cutting and Welding Equipment in good working condition.
2. Fire extinguisher available within 25 feet.
3. Local Fire Department phone # posted.
4. Floors swept clean of combustible material.
5. Combustible floors wetted down, and/or shielded.
6. No flammable materials stored near work area.
7. Wall and floor opening covered.
8. Covers suspended beneath work to collect sparks.
9. Atmospheric monitoring completed within 35 feet of work.

WORK IN CONFINED SPACE

1. Confined Space Permit.
2. Equipment cleaned of all liquid combustibles.
3. Containers purged of vapors.

FIRE WATCH

1. Provided during and 30 minutes after work process finished.
2. Fire extinguisher and water immediately available.

Special Precautions

Final check-up is to be made 30 minutes after completion of any operation unless a formal designated fire watch person is assigned.

The location where this work is to be done has been examined, necessary precautions taken, and permission is granted for this work.
Plan Issue Date: _____ Expires: _____
Signed: _____
(Individual responsible for authorizing Hot Work)

FINAL CHECK

Work area and all adjacent areas to which sparks and heat might have spread (including floor above, below and opposite sides of walls) were inspected 30 minutes after the work was completed and found fire safe.

Signed: _____ Time/Date: _____
(Individual responsible for authorizing Hot Work)

APPENDIX 18

Suburban Construction Management
Lead Written Program

A. Permissible Exposure Limit (PEL)

The OSHA standard sets a permissible exposure limit (PEL) of 50 micrograms of lead per cubic meter of air (50 ug/m(3)), averaged over a 8-hour workday that is referred to as a time-weighted average (TWA). This is the highest level of lead in air to which an employee may be permissibly exposed to over an 8-hour workday. However, since this is an 8-hour average, short exposures above the PEL are permitted so long as, for each 8-hour workday, the average exposure does not exceed this level.

B. Exposure Assessment

If lead is present in the workplace in any quantity, Suburban Construction Management is required to make an initial determination of whether any employee's exposure to lead exceeds the action level (30 ug/m(3) averaged over an 8-hour day). Employee exposure is that exposure which would occur if the employee were not using a respirator. This initial determination requires Suburban Construction Management to monitor workers' exposure, unless Suburban Construction Management has objective data that can demonstrate conclusively that no employee will be exposed to lead in excess of the action level. Where objective data is in lieu of actual monitoring, Suburban Construction Management must establish and maintain an accurate record, documenting its relevancy in assessing exposure levels for current job conditions. If such objective data is available, Suburban Construction Management need proceed no further on employee exposure assessment until such time that the conditions have changed and the determination is no longer valid. Objective data may be compiled from various sources, e.g., insurance companies and trade associations and information from suppliers or exposure data collected from similar operations. Objective data may also be comprised from previously collected sampling data included in the monitoring area. If it cannot be determined through using objective data that the employee exposure is less than the action level, Suburban Construction Management must conduct monitoring or must rely on relevant previous personal sampling, if available. Where monitoring is required for the initial determination, it may be limited to a representative number of employees who are reasonably expected to have the highest exposure levels. If Suburban Construction Management has conducted appropriate air sampling for lead in the past 12 months, Suburban Construction Management may use these results, provided they are applicable to the same employee tasks and exposure conditions and meet the requirements for accuracy as specified in the standard. If this initial determination shows that a reasonable possibility exists that any employee may be exposed, without regard to respirators,

over the action level, Suburban Construction Management must set up an air monitoring program to determine the exposure level representative of each employee exposed to lead at the workplace. In carrying out this air monitoring program, Suburban Construction Management is not required to monitor the exposure of every employee, but Suburban Construction Management must monitor a representative number of employees and job types. Enough sampling must be done to enable each employee's exposure level to reasonably represent full shift exposure. In addition, these air samples must be taken under conditions that represent each employee's regular, daily exposure to lead. The OSHA standard lists certain tasks which may likely result in exposure to lead in excess of the PEL and, in some cases, exposures in excess of 50 times the PEL.

Until Suburban Construction Management performs an employee exposure assessment as required above, and documents that the employee's lead exposure is not above the PEL, Suburban Construction Management will treat the employee as if the employee were exposed to lead above the PEL and not in excess of 500 ug/m(3) or (10 x PEL) and will implement employee protective measures as described below. The tasks covered by this requirement are:

1. Locations where lead containing coatings or paint are present.
2. Manual demolition of structures (e.g., drywall), manual scraping, manual sanding, heat gun applications, and power tool cleaning with dust collection system.
3. Spray painting with lead paint.

Until Suburban Construction Management performs an employee exposure assessment as required above and documents that the employee performing any of the listed tasks is not exposed in excess of 500 ug/m(3), Suburban Construction Management will treat the employee as if the employee were exposed to lead in excess of 500 ug/m(3) and will implement employee protective measures as described below. Where Suburban Construction Management does establish that the employee is exposed to levels below 500 ug/m(3), Suburban Construction Management may provide the exposed employee with the appropriate respirator prescribed for such use at such lower exposures, in accordance with Table 1 of this section. The tasks covered by this requirements are:

1. Using mortar containing lead and lead burning.
2. Where paint or coatings containing lead are present, rivet busting, power tool cleaning without dust collection systems, clean-up activities where dry expendable abrasives are used, and abrasive blasting enclosure movement and removal.

Until Suburban Construction Management performs an employee exposure assessment as required above and documents that the employee performing any of the listed tasks is not exposed to lead in excess of 2,500 ug/m(3) (5 x PEL), the employer will treat the employee as if the employee were exposed to lead in excess of 2,500 ug/m(3) and will implement employee protective measures. Where Suburban Construction Management does establish that the employee is exposed to

levels of lead below 2,500 ug/m(3), Suburban Construction Management may provide the exposed employee with the appropriate respirator prescribed for use at such lower exposure, in accordance with Table I of this section. Interim protection as described in this paragraph is required where lead containing coatings or paint are present on structures when performing:

1. Abrasive blasting.
2. Welding.
3. Cutting.
4. Torch burning.

If an employee is performing any of these tasks, Suburban Construction Management must provide that employee with the appropriate respiratory protection, protective clothing and equipment, change areas, hand washing facilities, biological monitoring, and training until such time that an exposure assessment is conducted that demonstrates that employee's exposure is below the PEL. If an employee is exposed to lead, and air sampling is performed, Suburban Construction Management is required to notify employee in writing within 5 working days of the air monitoring result that represents the employee's exposure. If the results indicate that the employee's exposure exceeds the PEL (without regard to employee's use of a respirator), Suburban Construction Management must also notify employee of this in writing, and provide employee with a description of the corrective action that has been taken or will be taken to reduce the employee's exposure. Employee's exposure must be rechecked by monitoring, at least every six (6) months if the employee's exposure is at or over the action level but below the PEL. Suburban Construction Management may discontinue monitoring for employees if two(2) consecutive measurements, taken seven(7) days apart, are at or below the action level. Air monitoring must be repeated every three(3) months if the employee is exposed over the PEL. Suburban Construction Management must continue monitoring for employees at this frequency until two(2) consecutive measurements, taken seven(7) days apart, are below the PEL but above the action level, at which time Suburban Construction Management must repeat monitoring of the employee's exposure every six(6) months and may discontinue monitoring only after the employee's exposure level drops below the action level. However, whenever there is a change of equipment, process, control, or personnel or a new type of job is added at the employee's workplace that may result in new or additional exposure to lead, Suburban Construction Management must perform additional monitoring.

C. Methods of Compliance

Suburban Construction Management is required to assure that no employee is exposed to lead in excess of the PEL as an 8-hour TWA. The OSHA standard for lead in construction requires employers to institute engineering and work practice controls including administrative controls to the extent feasible to reduce employee exposure to lead. Where such controls are feasible but not adequate to reduce exposures below the PEL, they must be used to reduce exposures to the lowest

level that can be accomplished by these means and then supplemented with appropriate respiratory protection. Suburban Construction Management is required to develop and implement a written compliance program prior to the commencement of any job where employee exposures may reach the PEL as an 8-hour TWA. The OSHA standard identifies the various elements that must be included in the plan. In addition, Suburban Construction Management' compliance plan must specify the means that will be used to achieve compliance and where controls are required, including any engineering plans or studies that have been used to select the control methods. If administrative controls involving job rotation are used to reduce employee exposure to lead, the job rotation schedule must be included in the compliance plan. The plan also must detail the type of protective clothing and equipment, including respirators, and housekeeping and hygiene practices that will be used to protect the employee from the adverse effects of exposure to lead. The written compliance program must be made available, upon request, to affected employees and their designated representatives. Finally, the plan must be reviewed and updated every six(6) months to assure it reflects the current status in exposure control.

D. Respiratory Protection

Suburban Construction Management is required to provide and assure employee's proper use of respirators when employee's exposure to lead is not controlled below the PEL by other means. Suburban Construction Management must pay the cost of the respirator when the PEL level is above the exposure limit. Further, Suburban Construction Management is also required to provide an employee a respirator even if employee's air exposure level is not above the PEL whenever an employee requests one. The employee might request a respirator when, for example, the employee has received medical advise that the employee's lead absorption should be reduced, or if the employee intends to have children in the near future, and wants to reduce the level of lead in the employee's body to minimize adverse reproductive effects. While respirators are the least satisfactory means of controlling employee's exposure, they are capable of providing significant protection if properly chosen, fitted, worn, cleaned, maintained, and replaced when they stop providing adequate protection. Suburban Construction Management is required to select respirators from the types listed in Table I of the Respiratory Protection of the OSHA standard. Any respirator chosen must be approved by the Mine Safety Health Administration (MSHA), or the National Institute for Occupational Safety and Health (NIOSH). This respirator selection table will enable Suburban Construction Management to choose a type of respirator that will give the employee the proper amount of protection based on the employee's airborne lead exposure. Suburban Construction Management may select a type of respirator that provides greater protection than that required by the OSHA standard; that is one recommended for higher concentrations of lead than is present in the workplace.

Suburban Construction Management has a Respiratory Protection Program. This program includes written procedures for the proper selection, use, cleaning, storage,

and maintenance of respirators. Suburban Construction Management must assure that employee's face piece fit properly. Proper fit of a respirator face piece is critical. Obtaining proper fit on each employee may require Suburban Construction Management to make available two or three different mask types. In order to assure that the employee's respirator fits properly and that the face piece leakage is minimized, Suburban Construction Management must give employee either a qualitative fit test or a quantitative fit test (if employee uses a negative pressure respirator).

Any respirator which has a filter, cartridge, or canister which cleans the air before the employee breathes, and which requires the force of the employee's inhalation to draw the air through the filtering element is a negative pressure respirator.

A positive pressure respirator supplies air to the employee directly. A quantitative fit test uses a sophisticated machine to measure the amount, if any, of test material that leaks from the face piece of the employee's respirator. The employee must also receive from Suburban Construction Management proper training in the use of respirators.

Suburban Construction Management must test the effectiveness of the employee's negative pressure respirator initially and at least once every six (6) months thereafter with a "qualitative fit test". In a qualitative fit test, the fit of the face piece is checked by seeing if the employee can smell substance placed outside the respirator. The OSHA standard provides that if the employee's respirator uses filter elements, the employee must be given the opportunity to change the filter element whenever an increase in breathing resistance is detected. The employee also must be permitted to periodically leave their work area to wash their face and respirator face piece whenever necessary to prevent skin irritation. If the employee is ever having difficulty in breathing during the fit test or while using a respirator, Suburban Construction Management must make a medical examination available to the employee to determine whether the employee can safely wear a respirator. The result of this examination may be to give the employee a positive pressure respirator (which reduces breathing resistance) or to provide alternative means of protection.

E. Protective Work Clothing and Equipment

If the employee is exposed to lead above the PEL as an 8-hour TWA, without regard to employee's use of a respirator, or if the employee is exposed to lead compounds such as lead arsenate or lead azide, which can cause skin and eye irritation, Suburban Construction Management must provide employee with protective work clothing and equipment appropriate for the hazard. If work clothing is provided, it must be provided in a clean and dry condition at least weekly, and daily if the airborne exposure to lead is greater than 200 ug/m(3). Appropriate protective work clothing and equipment can include coveralls or similar full-body work clothing, gloves, hats, shoes, or disposable shoe coverlets, and face shields or vented goggles. Suburban Construction Management is required to provide all such

equipment at no cost to the employee. In addition, Suburban Construction Management is responsible for providing repairs and replacement as necessary, and also is responsible for the cleaning, laundry or disposal of protective clothing and equipment. The OSHA standard requires that Suburban Construction Management assure that the employees follow good work practices when the employees are working in areas where employee exposure to lead may exceed the PEL.

The following procedures concerning protective clothing and equipment should be observed prior to beginning work. (Where applicable)

1. Designated changing areas.
2. Use work garments of appropriate protective gear, including respirators prior to entering work area.
3. Store any clothing not worn under protective clothing in a designated changing area.

Employees should follow these procedures upon leaving the work area:

1. HEPA vacuum heavily contaminated protective clothing while still being worn. At no time may lead be removed from protective clothing by any means that result in uncontrolled dispersal of lead into the air.
2. Remove shoe covers and leave them in the work area.
3. Remove protective clothing and gear in the dirty area of the designated changing area. Remove protective coveralls by carefully rolling down the garment to reduce exposure to dust.
4. Remove respirator last.
5. Wash hands and face.

Employees should follow these procedures upon finishing work for the day in addition to the procedures described above:

1. Place disposable coveralls and shoe covers with the abatement waste. (Where Applicable)
2. Contaminated clothing that is to be cleaned, laundered or disposed of must be placed in closed containers in the change room.
3. Clean protective gear, including respirators, in accordance with the OSHA standard.
4. Wash hands and face again. If showers are available, take a shower and wash hair. If shower is not available at the work site, shower and wash hair immediately at home.

F. Housekeeping

Suburban Construction Management must establish a housekeeping program sufficient to maintain all surfaces as free as practical of accumulation of lead dust. Vacuuming is the preferred method of meeting this requirement. The use of compressed air to clean the floor and other is generally prohibited unless the removal with compressed air is done in conjunction with ventilation systems designed to contain dispersal of lead dust. Dry or wet sweeping, shoveling, or

brushing may not be used except where vacuuming or other equally effective methods have been tried and do not work. Vacuums must be equipped with a special filter called a high-efficiency particulate air (HEPA) filter and emptied in a manner that minimizes the reentry of lead into the work area.

G. Hygiene Facilities and Practices

The OSHA standard requires that hand washing facilities be provided where occupational exposure to lead occurs. In addition, change areas, showers, and lunchrooms or eating areas are to be made available to workers exposed to lead above the PEL. Suburban Construction Management must assure that except in these facilities, food and beverages are not present or consumed, tobacco products are not present or used, and cosmetics are not applied, where airborne exposures are above the PEL. Change rooms provided by Suburban Construction Management must be equipped with separate storage facilities for protective clothing and equipment and street clothes to avoid cross- contamination. After showering, no required protective clothing and equipment worn during the shift may be worn home. It is important that the contaminated clothing and equipment be removed in the change areas and not be worn home or the employee will extend the employee's exposure to the employee's family since lead from the employee's clothing can accumulate in the employee's car, house, etc. Lunchrooms or eating areas may not be entered with protective clothing or equipment unless the surface dust has been removed by vacuuming, downdraft booth, or other cleaning method. Finally, employees exposed above the PEL must wash both their hands and faces prior to eating, drinking, smoking, or applying cosmetics. All of the facilities and hygiene practices above are essential to minimize additional sources of lead absorption from inhalation or ingestion of lead that may accumulate on the employee, the employee's clothes or on the employee's possessions. Strict compliance with these provisions can virtually eliminate several sources of lead exposure which significantly contribute to excessive lead absorption.

H. Employee Information and Training

Suburban Construction Management is required to provide an information and training program for all employees exposed to lead above the action level or who may suffer skin or eye irritation from lead compounds such as lead arsenate and lead azide. The program requires training these employees regarding the specific hazards associated with their work environment, protective measures which can be taken, including the contents of any compliance plan in effect, the danger of lead to their bodies (including their reproductive systems), and their rights under the law. All employees must be trained prior to initial assignment to the areas where there is a possibility of exposure over the action level. This training program must also be provided at least annually thereafter unless further exposure above the action level will not occur.

I. Signs

The OSHA standard requires that the following warning signs be posted in work areas where the exposure to lead exceeds the PEL:

1. Warning Lead Work.
2. Poisonous Area.
3. No Smoking or Eating.

These signs are to be posted and maintained in a manner which assures that the legend is readily visible.

J. Record Keeping

Suburban Construction Management is required to keep all records of exposure monitoring for airborne lead. These records must include the name and job classification of employees measured, details of the sampling and analytical techniques, the results of the sampling, and the type of respiratory protection being worn by the person sampled. Such records are to be retained for at least 30 years. Suburban Construction Management is also required to keep all records of biological monitoring and medical examination results. These records must include the names of the employees, the physician's written opinion, and a copy of the results of the examination. Medical records must be preserved and maintained for the duration of the employment plus 30 years. However, if the employee's duration of employment is less than one (1) year, the employer need not retain that employee's medical records beyond the period of employment if they are provided to the employee upon termination of employment. Record keeping is required if the employee is temporarily removed from the employee's job under the medical removal protection program. This record must include the employee's name and social security number, the date of the employee's removal and return, how the removal was or is being accomplished, and whether or not the reason for the removal was an elevated blood lead level. Suburban Construction Management is required to keep each medical removal record only for as long as the duration of an employee's employment. The OSHA standard requires that if the employee requests to see or copy environmental monitoring, blood lead levels monitoring, or medical removal records, they must be made available to the employee or to a representative that they authorize. Medical records other than the BLL's must also be provided upon request to the employee, to the employee's physician or any other person who the employee may specifically designate.

APPENDIX 19

Suburban Construction Management
Bloodborne Pathogens Exposure Control Plan

A. PURPOSE

The purpose of this exposure control plan is to eliminate or minimize employee occupational exposure to blood or certain other bodily fluids by educating employees on the hazards of bloodborne pathogens in construction.

B. BACKGROUND AND DEFINITIONS

Blood is the most important fluid in the human body. However, blood can sometimes transmit diseases such as Hepatitis and HIV, the virus that causes AIDS.

These diseases are bloodborne pathogens, disease-causing microorganisms that are transmitted through blood and other bodily fluids.

Because of the serious nature of bloodborne pathogens, it is important that you understand what they are, how they are transmitted, and how you can protect yourself.

We want you to understand the hazards of bloodborne pathogens, what to do if you suffer an exposure incident, and what Suburban Construction Management is doing to help you avoid potential infection.

To help you understand bloodborne pathogens please refer to the following definitions:

Bloodborne Pathogens – Microorganisms that are present in human blood that can cause disease in humans. These pathogens include Hepatitis Viruses and Human Immunodeficiency Virus (HIV).

Exposure Incident – When a person has contact with blood or other potentially infectious materials. This contact includes specific eye, mouth, other mucous membranes, non-intact skin, or parenteral contact (puncture, human bites, cuts, and abrasions).

Non-intact Skin – Skin that has cuts, abrasions, or other openings through which bloodborne pathogens could enter the bloodstream.

Parenteral – Taken into the body by Injection, infusion, or implantation, not through the alimentary canal.

Potentially Infectious Materials – Human blood, bodily fluid around organs, saliva, fluid in joints, fluid that protects fetuses, semen, and vaginal secretions.

Source Individual – Any individual, living or dead, whose blood or other potentially infectious materials may be a source of exposure.

Universal Precautions – An approach to infection control in which all human blood and certain human body fluids are treated as if known to be infectious for bloodborne pathogens.

Occupational Exposure – Reasonably anticipated employee contact with blood or other potentially infectious materials that may result from the performance of employee's duties. This includes skin, mucous membrane, or parenteral contact.

C. EDUCATION

1. First and Foremost, when providing first aid or CPR to a patient protect yourself first and then treat the victim.

2. Attitude is a critical element of protection. The right attitude means taking universal precautions. **Treat all human blood and body fluids as if they are infectious!** If you come upon an accident scene, assume that all fluids present are infectious. Avoid any unnecessary contact or inappropriate actions that could cause infection.

3. Personal Protective Equipment will be provided at all Suburban Construction Management jobsites in the First Aid Kits and trauma kits (where applicable). The primary goal as the designated first aid provider is to prevent infectious fluids from coming into contact with you or your clothes.

4. Housekeeping is important. All contaminated surfaces must be decontaminated properly. All work surfaces or equipment that has been contaminated must be cleaned with appropriate disinfectant such as 1 part bleach to 10 parts water and PPE must be worn during cleanup operations to prevent contact with infected surfaces.

5. Waste Disposal - regulated waste will be placed in containers which are closeable, constructed to contain all contents and prevent leakage of fluids during handling, storage, transportation or shipping. Instructions from the jobsite first aid kit or trauma kit shall be followed.

   Disposal of all regulated waste will be in accordance with applicable State regulations.

6. Hepatitis Vaccines and Post-Exposure Evaluation and Follow-up: Suburban Construction Management will make available the Hepatitis vaccines

and vaccination series to all employees who have had an occupational exposure incident, and post exposure follow-up.

D. STEPS TO TAKE IF YOU ARE EXPOSED TO BLOODBORNE PATHOGENS

1. Flush the area on your body that was exposed with warm water, then wash with soap and water. Vigorously scrub all areas.

2. If you have an open wound, squeeze gently to make bleed, then wash with soap and water.

3. Notify your supervisor, who will initiate our post-exposure procedures.

4. Go to your supervisor approved designated health care provider for treatment following an exposure incident.

5. You will be counseled by a physician regarding the risk of HIV or Hepatitis virus infection and any follow up treatment needed.

6. Hepatitis vaccinations will be made available after the employee has a potential occupational exposure unless, the employee has previously received the complete Hepatitis vaccination series, or antibody testing has revealed that the employee is immune, or the vaccine is contraindicate for medical reasons.

   Suburban Construction Management will ensure that all medical evaluations and procedures including the Hepatitis vaccines and vaccination series and post exposure follow-up, including prophylaxis are:

   - Made available at no cost to the employee;
   - Made available to the employee at a reasonable time and place;
   - Performed by or under the supervision of a licensed physician or by or under the supervision of another licensed healthcare professional and
   - Provided according to the recommendations of the US Public Health Service.

   All laboratory tests will be conducted by an accredited laboratory at no cost to the employee.

   Post Exposure Evaluation and Follow-up

   All exposure incidents will be reported, investigated, and documented. When the employee incurs an exposure incident, it will be reported to the immediate supervisor.

   Following a report of an exposure incident, the exposed employee will immediately receive a confidential medical evaluation and follow-up.

Collection and testing of blood for HBV and HIV serological status will comply with the following:

- The exposed employee's blood will be collected as soon as feasible and tested after consent is obtained.
- The employee will be offered the option of having their blood collected for testing of the employee's HIV/HBV serological status. The blood sample will be preserved for up to 90 days to allow the employee to decide if the blood should be tested for HIV serological status.

All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up. All post exposure follow-up will be performed by our designated health care providers.

E. EXPOSURE DETERMINATION

Suburban Construction Management does not anticipate that you will suffer a bloodborne pathogen exposure incident in the performance of your duties. There is at least one certified first-aid provider on your project and that person has received bloodborne pathogen training.

Bloodborne pathogens are not transmitted by casual contact such as touching or sharing equipment. The most common ways that people become infected by bloodborne pathogens is through sexual transmission or intravenous drug use. However, any contact with infected blood or body fluids carries the risk of potential infection.

The chances of becoming infected by bloodborne pathogens on the job are slim. According to the U.S. Centers for Disease Control and Prevention, the chances of a person becoming infected with HIV as the result of a cut with a contaminated object is less than four tenths of one percent.

The chances of becoming infected with HBV (Hepatitis B Virus) are higher. In each milliliter of blood (1/1000 of a litter) there are approximately 10 million viral particles. A dose of only 10,000 particles is enough to acquire this disease. Drops of blood too small to see can be transmitted into the body through the eyes, nose, mouth, or though undetected cuts in the skin.

Irrational fears about workplace exposure to bloodborne pathogens should be prevented but these diseases should not be treated lightly.

Suburban Construction Management

Hepatitis B Vaccination Declination Statement

(MANDATORY)

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself. However, I declined hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Name: _____

Signature: _____

Date: _____

Suburban Construction Management

Bloodborne Pathogen Exposure Incident Report

Date: _____ Time: _____

Project: _____

Specific location on project: _____

Name of injured employee: _____

Names of all persons rendering assistance: _____
_____
_____
_____
_____
_____

Description of the incident: _____
_____
_____
_____
_____

Describe exposures to blood or infectious material: _____
_____
_____

What protective equipment was being used by the exposed employees? _____
_____
_____

Action taken: _____
_____
_____
_____

_____ _____
Signature/Title Date

Send Copy to Corporate Office

APPENDIX 20

Suburban Construction Management
Confined Space Entry Program

1. Purpose and Scope

This procedure establishes requirements for Suburban Construction Management employees to participate in entries into, or attendance of, confined space/limited egress locations. This procedure applies to all Suburban Construction Management employees and operations.

2. Terms and Definitions

Asphyxiant – An airborne substance that can cause suffocation. Simple asphyxiants (e.g., carbon dioxide, nitrogen, argon, etc.) physically displace oxygen from the atmosphere; chemical asphyxiants (e.g., carbon monoxide, hydrogen cyanide, etc.) prevent the body from utilizing oxygen in the atmosphere.

Attendant – An individual who is stationed outside of a permit-required confined space to monitor authorized entrants and to initiate emergency response if necessary.

Confined Space – A space that:

- Is large enough and so configured that an employee can physically enter and perform assigned work.
- Has limited or restricted means for entry or exit.
- Is not designed for continuous human occupancy.
- In which atmospheric hazards may occur.

Competent Person – The designated individual who evaluates the hazards in the space and confirms the controls and procedures outlined in the plans and permits.

Entrant – Individual who enters into the confined space/limited egress to perform the task(s) as defined in the entry permit and mitigation/control procedures.

Entry – The action by which a person passes through an opening into a confined space. Entry is considered to have occurred as soon as any part of the body breaks the opening of a confined space.

Entry Permit – A written or printed document that controls entry into a permit-required confined space.

Entry Supervisor – An employee responsible for determining if acceptable entry conditions are present, for authorizing entry into a permit-required confined space, for

overseeing entry operations, and for terminating entry.

Hazardous Atmosphere – One or more of the following atmospheres that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue, injury, or acute illness:

- Oxygen concentrations below 19.5% or above 23.5%.
- Flammable atmospheres (concentrations ≥ 10% of the lower explosive limit).
- Toxic environments (concentrations > than the permissible exposure limit).

Non-Permit Required Confined Spaces (NPRCS) – Spaces that do not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm. These spaces do not require specific entry procedures and are only permissible as allowed by legislation.

Hot Work – Any task that may produce a spark or source of ignition (e.g., welding, cutting, etc.).

Immediately Dangerous to Life or Health (IDLH) – The National Institute for Occupational Safety and Health (NIOSH) exposure limit for the airborne concentration of a substance that can cause death, serious or irreversible health consequences, or inability to escape within 30 minutes.

Lower Explosive Limit (LEL) – The lowest concentration of a flammable gas/vapor in air which will ignite.

Oxygen-deficient – An atmosphere with an oxygen concentration less than 19.5%. 2.15 **Oxygen-enriched** – An atmosphere with an oxygen concentration greater than 23.5%.

Permit-Required Confined Space (PRCS) – A confined space that exhibits one or more of the following properties:

- Contains or has a potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an entrant.
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross-section.
- Contains any other recognized safety or health hazard.

Physical Hazard – A nonchemical hazard that may cause cuts, abrasions, suffocation, crushing, trauma, hearing loss, burns, or radiant energy effects (e.g., welding).

Upper Explosive Limit (UEL) – The highest concentration of a flammable gas/vapor in air that will ignite.

3. Procedure

Roles and Responsibilities

Jobsite Superintendent and Foreman

- Make available confined space training to employees engaged in projects covered by this procedure. This training must be completed and documented prior to initial assignment, prior to a change in assigned duties, if a new hazard has been created and/or if special deviations have occurred.

Project Managers

Determine alternative procedures that eliminate the need for entering confined spaces.

- Consult with First Link Safety regarding project specific requirements for confined space entries.
- Inform the field team about the client's or facility's requirements for confined space entries.
- Verify that only trained, authorized employees work in or near confined spaces.
- Ensure that written Confined Space Entry Procedures and permits are prepared for each entry.
- Assign an **Entry Supervisor** to be in control of all activities associated with the confined space.

Competent Person:

- Meet the confined space/limited egress requirements that are defined by OSHA regulations.
- Is delegated authority to take appropriate actions and to commit resources to identify and mitigate safety and health issues associated with confined space/limited egress entries.
- Has documented confined space/limited egress work experience and practical skills.
- Is capable of identifying workplace hazards relating to confined space/limited egress entries.

Rescue Organization

- The individual and/or organization who is properly trained and equipped to carry out a confined space entry rescue operation. A rescue organization must be on site for IDLH conditions while the work is being performed.

Entry Supervisor

- Assess the risks prior to entry and establish the work plan accordingly.

- Notify First Link Safety prior to entry into a confined space to review the planned activity, circumstances, and Confined Space Permit.
- Verify what conditions exist.
- Verify that all participants (entrants and attendant) are adequately trained for the work that is to be performed.
- Conduct a tailgate training session at the location of the confined space, reviewing all entries in the Permit with all attendants and entrants. Ensure the planned program must include procedures for coordinating entry operations for multi-employers so that employees of one employer do not endanger the employees of any other employer.
- Confirm that the air within the confined space is tested with an appropriated air monitoring instrument.
- Confirm that all air test results are documented on the Permit form.
- Verify that a rescue organization equipped with retrieval equipment and trained in confined space entry rescue is available. A rescue organization may be the local Fire Department or a client's Emergency Rescue Squad or the construction project's emergency response team.
- Emergency rescue capability must be established in the permit process and must include emergency contact numbers.
- Prior to the entry taking place, notifies the emergency rescue service of the time, location, and duration of work in the confined space.
- Confirm that appropriate means of communication are ensured (in place and operable) for the entry team. Communication can be verbal, hand signals, radio, or telephone.
- Confirm that the proper isolation of any process lines, pipes, or electrical systems that can affect the safety or health of entrants in a confined space are isolated and secure—e.g., blanking, blocking, lockout-tagout, and verifying that systems are isolated prior to proceeding with work.
- Verify that fresh air ports, manways, and accessways are opened during the entire operation.
- When forcing air into a confined space to facilitate the proper entry condition, ensure that fresh air is continuously forced into the confined space prior to and during work within a permit required confined space. Air will not be exhausted from a space. The objective is that the forced air will be sufficient to maintain a space safe for entry.
- Make sure that appropriate safety equipment is selected and used by all entrants based on the physical and health hazards that may exist.
- Cancel the entry permit at any time based on a change in monitored conditions or perceived hazards.

- Review the Confined Space Entry Permit after completion of the work to evaluate the process.

Attendant

- Must remain outside the confined space at all times. The **attendant** must not leave the post unattended at any time. If the attendant needs to leave his position, **entrants** must be called out of the confined space or another qualified attendant must take the position and responsibility. A single attendant shall not monitor more than one confined space at any given time.
- Confirm that correct names of all **entrants** are listed on the permit.
- Confirm that all applicable parts of the permit are completed before allowing any Suburban Construction Management **employee** to enter the space.
- Confirm that all equipment going into the confined space (e.g., tools and protective equipment) is in safe operating condition. It is prohibited for compressed gas bottles (e.g., burning and welding) to be brought into a confined space. All gas lines brought into accessways shall be protected from sharp edges.
- Confirm that all **entrants** have received any special instructions for the work to be performed before entering into the space.
- Maintain communication with **entrants** either visually, verbally, or through the use of hand signals or radio.
- Interrupt work and evacuate any/all **entrants** in the event of a newly developed dangerous condition, when signs of entrant stress or fatigue are noticed, or when the **attendant** needs to leave the post and cannot be replaced by another attendant.
- Summon rescue and other services during an emergency.
- Warn any unauthorized persons not to enter a Confined Space.

Entrants

- Responsible to know the Emergency Action Plan and be able to recognize the potential for real hazards associated with the Confined Space. Refer to the Permit and ask the **Entry Supervisor** or **First Link Safety** if a question arises.
- Know how to use the identified personal protective equipment (PPE) required for entry or rescue.
- Know how to exit the confined space as rapidly as possible without help whenever:
    - The **attendant** orders an evacuation.
    - Any alarm from a continuous monitor/detector sounds.
    - The **entrant(s)** recognizes the warning signs of exposure to hazardous substances that could be found in that confined space, including physical

conditions such as fatigue.

- Be aware of the toxic effects or symptoms of the hazardous materials that could be encountered in the confined space.
- Know how to relay an alarm to the outside attendant and to attempt self-rescue immediately upon becoming aware of hazardous conditions.
- Know any modification of normal work practices that are necessary for permit-required confined space work.

Employees

- Refrain from making any attempt to enter a confined space without first meeting the requirements of this Procedure and the applicable entry permit, and receiving authorization for entry from the entry supervisor.
- Employees or their representatives are entitled to request additional monitoring at any time.
- Avoid areas where other employees are working in confined spaces.

Confined Spaces

All confined spaces will be considered permit-required by default in the absence of a previous classification by the owner or Suburban Construction Management competent person.

All confined spaces under the control of Suburban Construction Management will be identified, evaluated, and classified.

Labeling/Signage

- All permit-required confined spaces under Suburban Construction Management control will be labeled so that employees are adequately warned of the potential for hazardous conditions
- When non-permit-required confined spaces require the implementation of confined space entry procedures because of specific work operations (e.g., painting, welding), all entry points will be labeled or identified by signs to alert all employees of the existence of the hazardous conditions. These labels or signs will be removed only when the hazard no longer exists (e.g., complete curing of the paint).

Classification of Confined Spaces

- For each identified confined space, an evaluation to determine the nature and extent of all possible hazards to entrants must be conducted. Consideration will be given to the following types of hazards:

    - The presence of possible airborne contaminants at concentrations exceeding established
    - Occupational Exposure limits (OELs / PELs).
    - The presence of any physical hazards (e.g., electrical shock, mechanical injury, etc.).
    - The presence of flammable or explosive conditions.
    - The presence of any potential for rapid flooding or engulfment.
    - Configurations/positioning that may cause an entrant to become trapped.
    - Initial classification as either a PRCS or NPRCS.
- Wherever the confined space is controlled by a client or a third party, the controlling entity must be available to provide the information necessary to complete the evaluation. However, if Suburban Construction Management personnel are requested to enter a confined space owned or controlled by others, the final evaluation will be with the Suburban Construction Management employee.
- Non-permit-required confined spaces can be designated only by a Certified Industrial Hygienist/Registered Occupational Hygienist, Certified Safety Professional, **First Link Safety**, or Professional Engineer after review of the space(s), historical monitoring data, and other factors (e.g., injuries that have occurred). Therefore, all confined spaces will be considered permit-required unless specifically designated as a non-permit-required space, in writing, on the approved confined space inventory listing.

PRCS Pre-Entry Procedure

- To protect employees during PRCS entries, Suburban Construction Management-specific PRCS entry procedures will be developed for each PRCS to be entered. Each entry procedure will specify:
    - The identity of the PRCS(s) to which the procedure applies.
    - The potential hazards associated with the entry operation/PRCS.
    - Pre-entry planning:
        - Required air monitoring equipment and procedures;
        - Required ventilation procedures (as applicable);
        - Required lockout/tagout procedures (as applicable);
        - Required emergency response/extraction equipment;
        - Rescue agency notification requirements (as applicable);
        - Required pre-entry monitoring procedures and applicable at-entry re-classification criteria;
        - PPE requirements during entry.
- Prior to the start of the entry operation, the **Entry Supervisor** will assign individuals on the entry team to the following jobs:

- **Entrant –** The person entering the PRCS.
- **Primary Attendant** – The person dedicated only to assisting the entrant, observing the entry operation, and maintaining communications with the entrant throughout the entry procedure.
- **Secondary Attendant for Rescue Procedures –** An additional employee who is assigned either to specific support of the entry operation or to working nearby can assist with rescue operations in the event of an accident. This person can perform other duties unrelated to observing the entry.

- The **Entry Supervisor** is responsible for ensuring that the individuals assigned to each job fully understand their duties and responsibilities prior to initiating the entry operation. The **Entry Supervisor** will review the complete entry procedure with all team members prior to the work. The **Entry Supervisor** will also verify the availability of locally accessible rescue services.
- Additional requirements for Pre-Entry Planning include the following:
  - Select the appropriate equipment to measure the potential hazards. Select a multi-gas meter capable of measuring oxygen, combustible gas (% LEL), and other hazardous gases.
  - Determine the acceptable values for the hazardous conditions being measured, based on the equipment in use and the field calibration method. The acceptable working levels are determined as follows:
    - Oxygen: 19.5% – 23.5%
    - LEL: <10%
    - Hydrogen sulfide: ≤10 ppm
    - Carbon monoxide: ≤25 ppm
    - Other toxic chemicals: contact First Link Safety.
  - Ensure that all the equipment selected is calibrated and that calibration is still valid.
- Personnel trained in accordance with this procedure shall perform field verification of equipment as follows:
  - Calibrate combustible gas meters using appropriate span gas for the detectors to be used. (This span gas calibration shall be performed each time the instrument is turned on).
  - Check detector tube pumps for leakage using the manufacturer's procedures.
  - Calibrate photo ionization detectors (PID) using isobutylene or other material in accordance with the manufacturer's directions.
  - Calibrate any other instrumentation to be used in accordance with manufacturer's directions.
  - Set up barricades and signage around the space being entered as required.
  - Set up required fall arrest, retrieval, or rescue systems.
  - Institute required lockout/tagout procedures (i.e. electrical, steam, liquid flow-

pipe blanking).
    - Ensure that a second person (trained as entry attendant) is available to assist in the set up procedures.
    - Agree upon a means of communication between the **entrant** and the **attendant**. (The **attendant** is not authorized to perform rescue involving entry into the space unless he/she is trained for rescue and another entry attendant replaces him/her prior to the attempt to rescue).
    - Verify a means to contact emergency rescue services for further assistance.
    - Complete the Confined Space Entry Permit.
- The **Entry Supervisor** shall also:
    - Have the **attendant** verify the completion of the required actions.
    - Sign the Permit upon verification of completed actions.
    - Maintain the Permit at all authorized entry sites until completion of the entry.

PRCS Entry Permits

- A PRCS Entry Permit is required to be completed for each individual PRCS entry operation. The Permit provides the means for documenting:
    - The identities and roles of all individuals involved in the entry operation.
    - Equipment used for performance of the entry (monitoring instruments, extraction equipment, etc.).
    - Pre-entry and operational monitoring results.
    - Communications protocols between Entrants, Attendants, and rescue services.
    - Lockout/Tagout procedures.
    - PPE for specific tasks (refer to the Task Hazard Analysis for the task).
    - Other relevant workplace conditions or events related to the entry operation (e.g., vault isolation procedures).
- Each Permit will be signed and authorized by the **Entry Supervisor**. At the completion of the entry operation, the Permit will be filed as part of the project records.
- A copy of Suburban Construction Management's Entry Permit is provided in this appendix.

PRCS Entry Procedure

- Test the atmosphere around the confined space access door or cover to ensure that no flammable conditions exist prior to the door or cover being removed. Note: Always check for oxygen levels first if the meter does not measure simultaneously. Low oxygen levels can cause LEL readings to be incorrect.
- Don any required PPE.
- Upon removal of the access cover/door, test the immediate atmosphere using

remote testing procedures to ensure that the immediate atmosphere is safe. If any of the parameters being tested are outside the acceptable working level, do not enter.

- If necessary, use ventilation equipment to either remove the contaminant(s) or to correct the oxygen-deficient atmosphere.
- If the initial test(s) are within acceptable working levels, slowly enter the space, continually testing the atmosphere in front and to the sides.
- In stratified atmospheres (i.e., vertical entries), test 4 feet in advance of the direction of travel. The entrant's travel speed must allow for adequate instrument response time.
- Test the entire area where work is to be performed prior to performance of any work.
- While performing the work, place the direct read instruments in a location that will not interfere with the work, will allow for continual monitoring, and will enable the entrant to detect alarms that may be activated.

Exit Procedure

- Remove all equipment.
- Replace all access covers.
- Ensure that all signs are visible and legible.
- Remove all lockout/tagout equipment.
- Note on the Permit any problems encountered while in the space.
- Finish the Permit and turn it in to the **Entry Supervisor.**
- The **Entry Supervisor** will inspect the Permit for completion and will investigate any noted problems. Actions taken to correct noted problems will be discussed with all authorized **entrants** and **attendants** for future implementation.
- The completed Permit will be maintained on file as required in this section.

NPRCS Entry Procedure

Persons entering this type of space only need to complete a confined space entry permit, to remain vigilant about conditions in the space, to remember that if any condition changes or if hazards are introduced into the space (e.g. welding/cutting operations) the classification and entry procedures in the space may change.

NPRCS Entry Procedure

- When entrance covers are removed, guard the opening to prevent an accidental fall through the opening and to protect each employee working in the space from foreign objects entering the space.
- Check the atmosphere with the gas detector for oxygen, LEL, and other hazardous gases (e.g. Methane, hydrogen sulfide, and carbon monoxide) in the

same order prior to entry into the space.
- Record the measured conditions on the permit and do not allow entry if detected levels are above safe working levels.
- Proceed with entry and work with caution.

NPRCS Post Entry Procedures
The following post-entry procedures must be followed after the completion of a PRCS entry:
- Remove all equipment.
- Replace all access covers.
- Ensure all signs are visible and legible.
- Remove all lockout/tagout equipment, if applicable

Rescue Services

If the **Entrant** is injured or rendered unconscious and needs assistance to exit the space:
- **Attendant** will operate entrant retrieval system to evacuate personnel within the confined space. If this system fails, they will call for emergency assistance
- **Once Rescuers arrive, the Rescuers will assume the duties of the Attendan**t. T**he Rescuer(s) will enter the space to extricate the downed entrant** and perform first aid services as required
- The **Attendant** will remain at the confined space and provide assistance to the Rescuer(s), if requested.

Facilitating Non-Entry Rescue
- Retrieval systems or methods shall be used whenever an authorized entrant enters a permit space (unless the retrieval equipment would increase the overall risk of entry).
- Retrieval systems shall meet the following requirements:
  - Each authorized **entrant** shall use the proper class of full body harness with a retrieval line attached.
  - The retrieval line shall be attached to a mechanical extraction device (mandatory for more than 5 feet deep rescue) or fixed point outside the permit space.

4. <u>Records</u>

Training Records – All employee training records shall be maintained.

Confined Space Entry Permit – Will be signed by the entry supervisor and maintained onsite during the confined space entry activity. Once the entry activity is officially closed

the entry permit shall be maintained in the project files.

CONFINED SPACE ENTRY PERMIT

Date:		
Site location or description:		
Purpose of entry: _____ _____		
Entry Supervisor(s) in charge of crews:	Type of crew (welding, plumbing, etc)	Phone #:
Permit duration:		
Communication procedures (including equipment): _____ _____		
Rescue procedures (also see emergency contact phone numbers at end of form): _____ _____		

REQUIREMENTS COMPLETED (Put N/A if item doesn't apply)	**DATE**	**TIME**	**REQUIREMENTS COMPLETED (Put N/A if item doesn't apply)**	**DATE**	**TIME**
Lockout/De-energize/Try-out			Supplied Air Respirator (N/A if alternate entry)		

Line(s) Broken-Capped-Blank			Respirator(s) (Air Purifying)		
Purge-Flush and Vent			Protective Clothing		
Ventilation (Continuous/positive)			Full Body Harness w/ “D” ring		
Secure Area (Post Signage and 15’ warning lines for fall hazards)			Emergency Escape Retrieval Equipment		
Lighting (Explosive Proof)			Lifelines		
Hotwork Permit			Standby safety personnel (N/A if alternate entry)		
Fire Extinguishers			Resuscitator—Inhalator (N/A if alternate entry)		
Add other specific information, if needed, or attach additional instructions or requirements. See the following examples in bold print.					
Line(s) to be bled/blanked:					
Ventilation equipment:					
PPE clothing:					
Respirator(s):					
Fire extinguisher(s):					
Emergency retrieval equipment:					

AIR MONITORING									
Substance Monitored		**Permissible Levels**	**Monitoring Results (including time)**						
Time monitored (put time) Percent Oxygen		Record the time 19.5% to 23.5%							
Lower Explosive Limit (LEL/LFL)		Under 10%							
Carbon Monoxide (CO)		Under 50 ppm							

Hydrogen Sulfide (H2S)		Under 10 ppm								
Toxic 1:		_____ PEL	____STEL							
Toxic 2:		_____ PEL	____STEL							

REMARKS:

_____

Air Tester Name	**ID#**	**Instrument(s) Used** (For example: oxygen meter, combustible gas indicator, etc.)	**Model # or Type**	**Serial# or Unit**

ATTENDANTS AND ENTRANTS

Attendant(s) (Required for all confined space work except alternate entry)	**ID#**	**Confined Space Entrant(s)**	**ID#**

REMARKS:

_____

SUPERVISOR AUTHORIZATION - ALL CONDITIONS SATISFIED

Department or phone number: _____

EMERGENCY CONTACT PHONE NUMBERS:

AMBULANCE:	FIRE:	SAFETY:	RESCUE TEAM:	OTHER:
_____	_____	_____	_____	_____

APPENDIX 21.1

Suburban Construction Management

Excavation Checklist

1. Have the Supervisors and Workers been trained in excavation safety laws and procedures per OSHA 1926, Subpart - P?

2. Have underground utilities been located?

3. Have buildings, utility poles, trees or any other objects or destabilizing forces been taken into consideration?

4. Has soil type been determined?

5. Has the appropriate means of sloping or shoring the excavation by OSHA 1926, Subpart P, required been determined?

6. Are ladders, steps or ramps in excavations over four feet deep provided where a worker will not have to travel laterally more than 25 feet to reach them?

7. Do ladders extend three feet above the surface and are they secured?

8. Has spoil pile been placed at least two feet back from the edge of the excavation?

9. Has confined space atmospheric hazards been considered, plus training?

10. Have undermined structures (i.e. sidewalks, buildings, streets) been shored, cribbed or approved by a registered engineer?

11. Do bridges and walkways have standard guard rails?

12. Are utilities crossing the excavation supported from above?

13. Have means been afforded to divert or remove water from the excavation?

14. Are open pits or shafts covered or barricaded?

15. Are inspections made by a competent person daily or more frequently as conditions require (i.e., after rain, presence of ground water)?

16. When the job is completed, is the shoring or shielding removed in a manner which insures the safety of workers?

Copy to Corporate Office

APPENDIX 21.2

Suburban Construction Management

Daily Excavation Inspection Report

Date/Time/Job

Depth

Soil Type

Slope Ratio

Shoring OK

Shielding OK

Barricades

Water Removal

Traffic Control

Atmosphere

Spoil Pile

Comments

Competent Person Signature Title

Copy to Corporate Office

APPENDIX 22

Suburban Construction Management

Safety Training Attendance Form

The undersigned individuals have received training concerning the subject matter described below. Their signature indicates that they clearly understand the conditions, requirements, rights, and responsibilities that are associated with the subject matter and related policies, programs, and standards as may be applicable.

Subject of Training Session: _____

Date: _____ **Job:** _____

TRAINER

_____ _____

Printed Name *Signature*

ATTENDEES

Printed Name *Signature*

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____
11. _____
12. _____

Length of Training Session: 15 30 45 60 minutes (circle one)

APPENDIX 23

Suburban Construction Management
Safety Committee

A. **Purpose:** To assist in the detection and elimination of unsafe conditions and work procedures. A safety and health committee will be established with representation from employees and management.

B. **Procedure:** The following guidelines will be followed:
1. Committee members will be selected by Suburban Construction Management management to represent employee safety concerns.
2. Safety committee members will be rotated at least annually. Should a vacancy occur on the committee, a new member will be selected by corporate management.
3. The meetings will be held monthly at the Suburban Construction Management corporate office.
4. The date and hour of meetings will be determined by the Suburban Construction Management corporate management.
5. The length of each meeting will be approximately one hour.
6. The attendance and subjects discussed will be documented and maintained on file for a period of three years. Written information and directives will be distributed to Project Superintendents, and Project Managers. Information is to be relayed to employees will be addressed in the weekly project safety meeting and will be posted on the safety bulletin board.
7. The Project Managers and Superintendents are responsible for auditing individual projects for compliance with new directives.

C. **Scope of Activities:**
1. Conduct in-house safety inspections with supervisor involved.
2. Implement & ensure training for fire & evacuation procedures.
3. Assist in accident investigation to uncover trends.
4. Review accident reports to determine means or elimination.
5. Assist in implementation of hazardous materials communications.
6. Accept and evaluate employee suggestions.
7. Review job procedures and recommend improvements.
8. Monitor the safety program effectiveness.
9. Promote and publicize safety.

D. **Documentation:** All Safety Committee activities will be documented and available for review by employees and regulatory agencies.

E. **Implementation:** Members of the Safety Committee will, prior to the regularly scheduled committee meeting, assist the appropriate supervisors in conducting self-inspections of their respective work areas to determine what hazardous conditions and/or practices exist. An inspection checklist should be utilized. Other

sources that can be consulted or utilized in conducting inspections include:

1. General Safety and Health Standards.
2. Employee suggestions.
3. Previous accident experience of this company.
4. First Link Safety.

Findings of the self-inspection will be reviewed and discussed at the next scheduled Safety Committee meeting. Unresolved problems resulting from this inspection will be forwarded through the Safety Committee organizational process.

F. **Follow up:** The over-site of the recommendations by the committee may be accomplished by one of the following options:

1. Carrying out the recommendations.
2. Explaining why no action can be taken.
3. Proposing an alternative.

APPENDIX 24

Suburban Construction Management

Stretch and Flex Program Stretches

Shoulder Shrug with High Reach

1. Lift (shrug) shoulders as high as possible while slowly raising your arms to fully extend position above head.
2. At the same time, lift the body up onto your toes (for as long as comfortable). While reaching high, extend and spread fingers.
3. Hold this position for 10 seconds and then slowly lower arms to the side into a neutral body position. Relax while breathing slowly and rhythmically. Concentrate on your breathing rate for at least 5 breathing cycles.

Target: Biceps, lats, forearms, and muscles that support the spine. Particularly good for using hand tools and light lifting tasks.

Neck Stretch

1. Keep your neck as straight as possible while relaxing your shoulders. Tilt your head to the right, slowly lower head toward right shoulder.

2. Repeat in four positions: right, left, front and back each time returning to the upright position.

3. Be sure to do this slowly and do not hold your breath. There should be a complete breath cycle with each position of the head!

Target: Neck muscles and stress reducer. Particularly good for equipment operators, office personnel, and engineers.

Tricep Stretch

1. Bring right hand to upper back between shoulder blades from above shoulder.
2. Place left hand on the triceps (muscle on the underside of the arm) near the elbow.
3. Gently pull right elbow up and back with left hand, moving the right hand down center of upper back as far as comfortable. This should not cause pinching in the neck. Repeat on opposite side.

Target: Triceps and shoulders, particularly good for light lifting, carrying or pushing such as laborers, and mail clerks.

Upper Trunk Stretch

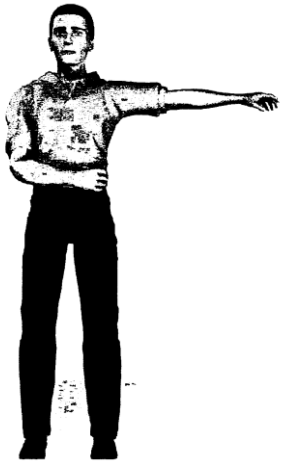
1. Place Hands on back of hips.
2. Slowly arch upper body backward to a comfortable position. Hold while continuing to breathe.
3. Return to neutral position and repeat two more times.

Target: Lower back, abdominals. Particularly good for truck drivers, equipment operators, laborers.

Shoulder Rotation Stretch

1. Keeping knees slightly bent, clasp hands behind back.
2. Slowly bend forward from waist to a comfortable angle while lifting arms upward and behind your back.
3. Hold position for one breath cycle and slowly return to upright position. Repeat 2 more times.

Target: Shoulders and upper back. Particularly good for carpenters, office workers.



Trunk Rotation

1. Extend left arm out to side and grasp left hip with right hand.
2. Rotate upper body to the left while pulling on hip with right hand.
3. Release tension and change to other side. Repeat on opposite side.

Target: Lower back and trunk support muscles. Particularly good for laborers, mechanics, and iron workers.

Lateral Rotation Stretch

1. Stand upright with feet slightly apart for balance. Extend left arm out to side and grasp left hip with right hand.
2. Rotate upper body to left while pulling on hip with right hand, then bend slowly from waist to left side to a comfortable angle.
3. Return to upright position and change hand locations to other side. Repeat on opposite side.

Target: Lats, lower back muscles, abdominals, and upper leg muscles. Particularly good for laborers, iron workers.

Lateral Stretch

1. Place right hand on waist, extend left arm over head and bend upper body sideways to the right.
2. Hold position for one breath cycle and return to upright position.
3. Repeat two more times and change hand position to other side. Repeat on opposite side.

Target: Lats and triceps plus shoulder mobility. Particularly good for masons, riggers, machinists.

Single Leg Stretch

1. Cross leg, keeping both knees slightly flexed.
2. Bend forward slowly from the waist and place both hands on the forward knee. Continue bending forward as far as possible.
3. Hold position for one breath cycle. Warning: discontinue this exercise if you become dizzy or lose your balance. Change leg position and repeat.

Target: Hamstrings, lower back muscles and stability. Particularly good for laborers, masons, and mechanics.

Single Quadriceps Stretch

1. With your left hand holding onto a stationary object for support, grasp your right ankle behind hips with right hand.
2. Pull ankle upward to stretch the quadriceps muscle. Warning: do not attempt this exercise if you have problems with balance or severe knee injuries. If you have knee injuries, you may elect to lift the lower leg behind you and hold the position for 10 seconds. Repeat on opposite side.

Target: Quadriceps and also helps body balance and ankle strength. Particularly good for laborers, flaggers, and ironworkers.

Calf Stretch

1. Stand in upright position, left leg forward.
2. Flex the upper trunk forward and place both hands on left knee.
3. Keeping both feet flat on the floor, slowly push hips and body forward as far as possible as though you are leaning into something. The stress should be on the calf muscles in the back of the right leg if you keep your feet flat. Repeat on opposite side.

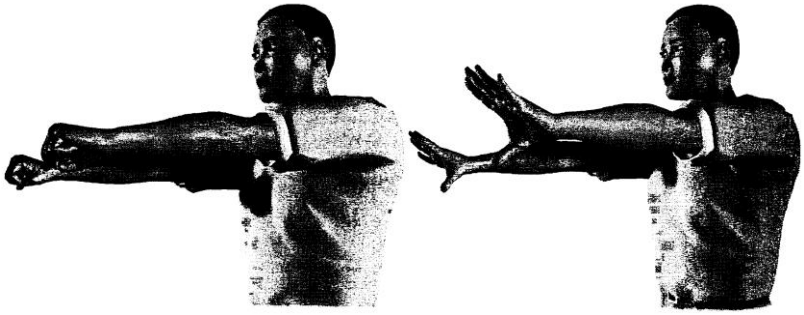
Target: Calves, lower back muscles. Particularly good for operators, teamsters, maintenance workers.

Wrist Extension

1. Palms together with fingers apart, press momentarily together and release.
2. Stretch arms out forward and make a fist in each hand. Hold 5 seconds and open hands wide.
3. Force your thumbs down while keeping fingers pointing toward the sky, wrists are bend back and elbows should be locked. You should feel a slight burn in the upper muscles (extensor muscles) of the forearm. These muscles are frequently less used and developed than the flexor muscles in the forearm which leads to unbalance and potential wrist injuries.
4. Hold 10 seconds and release. Return your arms to the neutral position at your

side and shake out your hands.

Target: Exterior muscles. Particularly good for carpenter, administrative professionals, machinists, and maintenance workers.



APPENDIX 25.1

Suburban Construction Management

Respirable Crystalline Silica Program

PURPOSE

This Respirable Crystalline Silica Program was developed to prevent employee exposure to hazardous levels of Respirable Crystalline Silica that could result through construction activities or nearby construction activities occurring on worksites. Respirable Crystalline Silica exposure at hazardous levels can lead to lung cancer, silicosis, chronic obstructive pulmonary disease, and kidney disease. It is intended to meet the requirements of the Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153) established by the Occupational Safety and Health Administration (OSHA).

All work involving chipping, cutting, drilling, grinding, or similar activities on materials containing Crystalline Silica can lead to the release of respirable-sized particles of Crystalline Silica (i.e. Respirable Crystalline Silica). Crystalline Silica is a basic component of soil, sand, granite and many other minerals. Quartz is the most common form of Crystalline Silica. Many materials found on constructions sites include Crystalline Silica; including but not limited to – cement, concrete, asphalt, pre-formed structures (inlets, pipe, etc.) and others. Consequently, this program has been developed to address and control these potential exposures to prevent our employees from experiencing the effects of occupational illnesses related to Respirable Crystalline Silica exposure.

SCOPE

This Respirable Crystalline Silica Program applies to all employees who have the potential to be exposed to Respirable Crystalline Silica when covered by the OSHA Standard. The OSHA Respirable Crystalline Silica Construction Standard applies to all occupational exposures to Respirable Crystalline Silica in construction work, except where employee exposure will remain below 25 micrograms of Respirable Crystalline Silica per cubic meter of air (25 $\mu g/m^3$) as an 8-hour time-weighted average (TWA) under any foreseeable conditions.

RESPONSIBILITIES

Suburban Construction Management firmly believes protecting the health and safety of our employees is everyone's responsibility. This responsibility begins with upper management providing the necessary support to properly implement this program. However, all levels of the organization assume some level of responsibility for this program including the following positions.

Suburban Construction Management Upper Management:

- Conduct job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments in order to determine if an employee's exposure will be above 25 $\mu g/m^3$ as an 8-hour TWA under any

foreseeable conditions

- Select and implement into the project's ECP the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) - a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping, and others.
  NOTE: OSHA's Construction Standard Table 1 is a list of 18 common construction tasks along with acceptable exposure control methods and work practices that limit exposure for those tasks.
- Ensure that the materials, tools, equipment, personal protective equipment (PPE), and other resources (such as worker training) required to fully implement and maintain this Respirable Crystalline Silica Program are in place and readily available if needed.
- Ensure that Project Managers, Superintendents, Competent Persons, and employees are educated in the hazards of Silica exposure and trained to work safely with Silica in accordance with OSHA's Respirable Crystalline Silica Construction Standard and OSHA's Hazard Communication Standard. Superintendents and Competent Persons may receive more advanced training than other employees.
- Maintain written records of training (for example, proper use of respirators), ECPs, inspections (for equipment, PPE, and work methods/practices), medical surveillance (under lock and key), respirator medical clearances (under lock and key) and fit-test results.
- Conduct an annual review (or more often if conditions change) of the effectiveness of this program and any active project ECP's that extend beyond a year. This includes a review of available dust control technologies to ensure these are selected and used when practical.
- Coordinate work with other employers and contractors to ensure a safe work environment relative to Silica exposure.

Project Manager/Superintendents:

- Ensure all applicable elements of this Respirable Crystalline Silica Program are implemented on the project including the selection of a Competent Person.
- Assist Upper Management in conducting job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments in order to determine if an ECP, exposure monitoring, and medical surveillance is necessary.
- Assist in the selection and implementation of the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) - a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping and others.
- Ensure that employees using respirators have been properly trained, medically cleared, and fit-tested in accordance with the company's Respiratory Protection Program. This process will be documented.
- Ensure that work is conducted in a manner that minimizes and adequately

controls the risk to workers and others. This includes ensuring that workers use appropriate engineering controls, work practices, and wear the necessary PPE.
- Where there is risk of exposure to Silica dust, verify employees are properly trained on the applicable contents of this program, the project-specific ECP, and the applicable OSHA Standards (such as Hazard Communication). Ensure employees are provided appropriate PPE when conducting such work.

Superintendents/Foreman:
- Make frequent and regular inspections of job sites, materials, and equipment to implement the written ECP.
- Identify existing and foreseeable Respirable Crystalline Silica hazards in the workplace and take prompt corrective measures to eliminate or minimize them.
- Notify the Project Manager of any deficiencies identified during inspections in order to coordinate and facilitate prompt corrective action.
- Assist the Project Manager in conducting job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments in order to determine if an ECP, exposure monitoring, and medical surveillance is necessary.

Employees:
- Follow recognized work procedures (such as the Construction Tasks identified in OSHA's Construction Standard Table 1) as established in the project's ECP and this program.
- Use the assigned PPE in an effective and safe manner.
- Participate in Respirable Crystalline Silica exposure monitoring and the medical surveillance program.
- Report any unsafe conditions or acts to the Site Manager and/or Competent Person.
- Report any exposure incidents or any signs or symptoms of Silica illness.

DEFINITIONS

If a definition is not listed in this section, please contact your supervisor. If your supervisor is unaware of what the term means, please contact the Competent Person or your Safety Department.
- Action Level means a concentration of airborne Respirable Crystalline Silica of 25 $\mu g/m^3$, calculated as an 8-hour TWA.
- Competent Person means an individual who is capable of identifying existing and foreseeable Respirable Crystalline Silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them.
- Employee Exposure means the exposure to airborne Respirable Crystalline Silica that would occur if the employee were not using a respirator.
- High-Efficiency Particulate Air (HEPA) Filter means a filter that is at least 99.97 percent efficient in removing monodispersed particles of 0.3 micrometers in diameter.
- Objective Data means information, such as air monitoring data from industry-

wide surveys or calculations based on the composition of a substance, demonstrating employee exposure to Respirable Crystalline Silica associated with a particular product or material or a specific process, task, or activity. The data must reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations.

- Permissible Exposure Limit (PEL) means the employer shall ensure that no employee is exposed to an airborne concentration of Respirable Crystalline Silica in excess of 50 $\mu g/m^3$, calculated as an 8-hour TWA.
- Physician or Other Licensed Health Care Professional (PLHCP) means an individual whose legally permitted scope of practice (i.e., license, registration, or certification) allows him or her to independently provide or be delegated the responsibility to provide some or all of the particular health care services required by the Medical Surveillance Section of the OSHA Respirable Crystalline Silica Standard.
- Respirable Crystalline Silica means Quartz, Cristobalite, and/or Tridymite contained in airborne particles that are determined to be respirable by a sampling device designed to meet the characteristics for respirable-particle size- selective samplers specified in the International Organization for Standardization (ISO) 7708:1995: Air Quality-Particle Size Fraction Definitions for Health-Related Sampling.
- Specialist means an American Board Certified Specialist in Pulmonary Disease or an American Board Certified Specialist in Occupational Medicine.

REQUIREMENTS

Specified Exposure Control Methods

When possible and applicable, Suburban Construction Management will conduct activities with potential Silica exposure to be consistent with OSHA's Construction Standard Table 1. Supervisors will ensure each employee under their supervision and engaged in a task identified on OSHA's Construction Standard Table 1 have fully and properly implemented the engineering controls, work practices, and respiratory protection specified for the task on Table 1 (unless Suburban Construction Management has assessed and limited the exposure of the employee to Respirable Crystalline Silica in accordance with the Alternative Exposure Control Methods Section of this program).

Table 1: Specified Exposure Control Methods When Working With Materials Containing Crystalline Silica

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
1	Stationary masonry saws	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
2a	Handheld power saws (any blade diameter) when used outdoors	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
2b	Handheld power saws (any blade diameter) when used indoors or in an enclosed area	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
3	Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less) for tasks performed outdoors only	• Use saw equipped with commercially available dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.	None	None
4a	Walk-behind saws when used outdoors	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
4b	Walk-behind saws when used indoors or in an enclosed area	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
5	Drivable saws for tasks performed outdoors only	• Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
6	Rig-mounted core saws or drills	• Use tool equipped with integrated water delivery system that supplies water to cutting surface. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
7	Handheld and stand-mounted drills (including impact and rotary hammer drills)	• Use drill equipped with commercially available shroud or cowling with dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. • Use a HEPA-filtered vacuum when cleaning holes.	None	None
8	Dowel drilling rigs for concrete for tasks performed outdoors only	• Use shroud around drill bit with a dust collection system. • Dust collector must have a filter with 99% or greater efficiency and a filter cleaning mechanism. • Use a HEPA-filtered vacuum when cleaning holes.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
9a	Vehicle-mounted drilling rigs for rock and concrete	• Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector.	None	None
9b	Vehicle-mounted drilling rigs for rock and concrete	• Operate from within an enclosed cab and use water for dust suppression on drill bit.	None	None
10a	Jackhammers and handheld powered chipping tools when used outdoors	• Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10b	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	• Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
10c	Jackhammers and handheld powered chipping tools when used outdoors	• Use tool equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10d	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	• Use tool equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
11	Handheld grinders for mortar removal (i.e., tuckpointing)	• Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	Powered Air-Purifying Respirator (PAPR) with P100 Filters
12a	Handheld grinders for uses other than mortar removal for tasks performed outdoors only	• Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
12b	Handheld grinders for uses other than mortar removal when used outdoors	• Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
12c	Handheld grinders for uses other than mortar removal when used indoors or in an enclosed area	• Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
13a	Walk-behind milling machines and floor grinders	• Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
13b	Walk-behind milling machines and floor grinders	• Use machine equipped with dust collection system recommended by the manufacturer. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. • When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.	None	None
14	Small drivable milling machines (less than half-lane)	• Use a machine equipped with supplemental water sprays designed to suppress dust. • Water must be combined with a surfactant. • Operate and maintain machine to minimize dust emissions.	None	None
15a	Large drivable milling machines (half-lane and larger) for cuts of any depth on asphalt only	• Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. • Operate and maintain machine to minimize dust emissions.	None	None
15b	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	• Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. • Operate and maintain machine to minimize dust emissions.	None	None
15c	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	• Use a machine equipped with supplemental water spray designed to suppress dust. • Water must be combined with a surfactant. • Operate and maintain machine to minimize dust emissions.	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
16	Crushing machines	• Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyers, sieves/sizing or vibrating components, and discharge points). • Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions. • Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station.	None	None
17a	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	• Operate equipment from within an enclosed cab.	None	None
17b	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	• When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
18a	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	• Apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
18b	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	• When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.	None	None

When implementing the control measures specified in Table 1, Suburban Construction Management shall:

- For tasks performed indoors or in enclosed areas, provide a means of exhaust as needed to minimize the accumulation of visible airborne dust;
- For tasks performed using wet methods, apply water at flow rates sufficient to minimize release of visible dust;
- For measures implemented that include an enclosed cab or booth, ensure that the enclosed cab or booth:
    - Is maintained as free as practicable from settled dust;
    - Has door seals and closing mechanisms that work properly;
    - Has gaskets and seals that are in good condition and working properly;
    - Is under positive pressure maintained through continuous delivery of fresh air;
    - Has intake air that is filtered through a filter that is 95% efficient in the 0.3-10.0 μm range (e.g., MERV-16 or better); and
    - Has heating and cooling capabilities.
- Where an employee performs more than one task included on OSHA's Construction Standard Table 1 during the course of a shift, and the total duration of all tasks combined is more than four hours, the required respiratory protection for each task is the respiratory protection specified for more than four hours per shift. If the total duration of all tasks on Table 1 combined is less than four hours, the required respiratory protection for each task is the respiratory protection specified for less than four hours per shift.

Alternative Exposure Control Methods

Alternative Exposure Control Methods apply for tasks not listed in OSHA's Construction Standard Table 1, or where Suburban Construction Management cannot fully and properly implement the engineering controls, work practices, and respiratory protection described in Table 1.

First, Suburban Construction Management will assess the exposure of each employee who is or may reasonably be expected to be exposed to Respirable Crystalline Silica at or above the Action Level in accordance with either the Performance Option or the Scheduled Monitoring Option.

- **Performance Option** – Suburban Construction Management will assess the 8-hour TWA exposure for each employee on the basis of any combination of air monitoring data or objective data sufficient to accurately characterize employee exposures to Respirable Crystalline Silica.
- **Scheduled Monitoring Option:**
    - Suburban Construction Management will perform initial monitoring to assess the 8-hour TWA exposure for each employee on the basis of one or more personal breathing zone air samples that reflect the exposures of employees on each shift, for each job classification, and in each work area. Where several employees perform the same tasks on the same shift and in the same work area, Suburban Construction Management will plan to monitor a

representative fraction of these employees. When using representative monitoring, Suburban Construction Management will sample the employee(s) who are expected to have the highest exposure to Respirable Crystalline Silica.

- If initial monitoring indicates that employee exposures are below the Action Level, Suburban Construction Management will probably discontinue monitoring for those employees whose exposures are represented by such monitoring.
- Where the most recent exposure monitoring indicates that employee exposures are at or above the Action Level but at or below the PEL, Suburban Construction Management will repeat such monitoring within six months of the most recent monitoring.
- Where the most recent exposure monitoring indicates that employee exposures are above the PEL, Suburban Construction Management will repeat such monitoring within three months of the most recent monitoring.
- Where the most recent (non-initial) exposure monitoring indicates that employee exposures are below the Action Level, Suburban Construction Management will repeat such monitoring within six months of the most recent monitoring until two consecutive measurements, taken seven or more days apart, are below the Action Level, at which time Suburban Construction Management will probably discontinue monitoring for those employees whose exposures are represented by such monitoring, except when a reassessment is required. Suburban Construction Management will reassess exposures whenever a change in the production, process, control equipment, personnel, or work practices may reasonably be expected to result in new or additional exposures at or above the Action Level, or when Suburban Construction Management has any reason to believe that new or additional exposures at or above the Action Level have occurred.

Suburban Construction Management will ensure that all Respirable Crystalline Silica samples taken to satisfy the monitoring requirements of this program and OSHA are collected by a qualified individual (i.e. a Certified Industrial Hygienist) and the samples are evaluated by a qualified laboratory (i.e. accredited to ANS/ISO/IEC Standard 17025:2005 with respect to Crystalline Silica analyses by a body that is compliant with ISO/IEC Standard 17011:2004 for implementation of quality assessment programs).

Within five working days after completing an exposure assessment, Suburban Construction Management will individually notify each affected employee in writing of the results of that assessment or post the results in an appropriate location accessible to all affected employees.

Whenever an exposure assessment indicates that employee exposure is above the PEL, Suburban Construction Management will describe in the written notification the corrective action being taken to reduce employee exposure to or below the PEL.

Where air monitoring is performed, Suburban Construction Management will provide

affected employees or their designated representatives an opportunity to observe any monitoring of employee exposure to Respirable Crystalline Silica. When observation of monitoring requires entry into an area where the use of protective clothing or equipment is required for any workplace hazard, Suburban Construction Management will provide the observer with protective clothing and equipment at no cost and shall ensure that the observer uses such clothing and equipment.

Once air monitoring has been performed, Suburban Construction Management will determine its method of compliance based on the monitoring data and the hierarchy of controls. Suburban Construction Management will use engineering and work practice controls to reduce and maintain employee exposure to Respirable Crystalline Silica to or below the PEL, unless Suburban Construction Management can demonstrate that such controls are not feasible. Wherever such feasible engineering and work practice controls are not sufficient to reduce employee exposure to or below the PEL, Suburban Construction Management will nonetheless use them to reduce employee exposure to the lowest feasible level and shall supplement them with the use of respiratory protection.

In addition to the requirements of this program, Suburban Construction Management will comply with other programs and OSHA standards (such as 29 CFR 1926.57 [Ventilation]), when applicable where abrasive blasting is conducted using Crystalline Silica-containing blasting agents, or where abrasive blasting is conducted on substrates that contain Crystalline Silica.

Control Methods

Suburban Construction Management will provide control methods that are either consistent with Table 1 or otherwise minimize worker exposures to Silica. These exposure control methods can include engineering controls, work practices, and respiratory protection. Listed below are control methods to be used when Table 1 is not followed:

Respiratory Protection

Where respiratory protection is required by this program, Suburban Construction Management will provide each employee an appropriate respirator that complies with the requirements of the company's Respiratory Protection Program and the OSHA Respiratory Protection Standard (29 CFR 1910.134).

Respiratory protection is required where specified by the OSHA Construction Standard Table 1, for tasks not listed in Table 1, or where the company has not fully and properly implemented the engineering controls, work practices, and respiratory protection described in Table 1. Situations requiring respiratory protection include:

- Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls;
- Where exposures exceed the PEL during tasks, such as certain maintenance and repair tasks, for which engineering and work practice controls are not feasible; and
- During tasks for which an employer has implemented all feasible engineering and work practice controls and such controls are not sufficient to reduce exposures to or below the PEL.

Housekeeping

Suburban Construction Management does not allow dry sweeping or dry brushing where such activity could contribute to employee exposure to Respirable Crystalline Silica unless wet sweeping, HEPA-filtered vacuuming, or other methods that minimize the likelihood of exposure are not feasible.

Suburban Construction Management does not allow compressed air to be used to clean clothing or surfaces where such activity could contribute to employee exposure to Respirable Crystalline Silica unless:

- The compressed air is used in conjunction with a ventilation system that effectively captures the dust cloud created by the compressed air; or
- No alternative method is feasible.

Written Exposure Control Plan

When employee exposure on a construction project is expected to be at or above the Action Level, a Written Exposure Control Plan (ECP) will be established and implemented. This ECP will contain at least the following elements:

- A description of the tasks in the workplace that involve exposure to Respirable Crystalline Silica;
- A description of the engineering controls, work practices, and respiratory protection used to limit employee exposure to Respirable Crystalline Silica for each task;
- A description of the housekeeping measures used to limit employee exposure to Respirable Crystalline Silica; and
- A description of the procedures used to restrict access to work areas, when necessary, to minimize the number of employees exposed to Respirable Crystalline Silica and their level of exposure, including exposures generated by other employers or sole proprietors.

The written ECP will designate a Competent Person to make frequent and regular inspections of job sites, materials, and equipment to ensure the ECP is implemented.

The written ECP will be reviewed at least annually to evaluate the effectiveness of it and update it as necessary. Having said this, ECP's are project specific and most project durations do not exceed a year. The written ECP will be readily available for examination and copying, upon request, to each employee covered by this program and/or ECP, their designated representatives, and OSHA.

Medical Surveillance

Medical surveillance will be made available for each employee who will be required to use a respirator for 30 or more days per year due to their Respirable Crystalline Silica exposure. Medical surveillance (i.e. medical examinations and procedures) will be performed by a PLHCP and provided at no cost to the employee at a reasonable time and place.

Suburban Construction Management will make available an initial (baseline) medical examination within 30 days after initial assignment, unless the employee has received a medical examination that meets the requirements of the OSHA Respirable Crystalline Silica Construction Standard within the last three years. The examination shall consist of:

- A medical and work history, with emphasis on past, present, and anticipated exposure to Respirable Crystalline Silica, dust, and other agents affecting the respiratory system in addition to any history of respiratory system dysfunction, including signs and symptoms of respiratory disease (e.g., shortness of breath, cough, wheezing), history of tuberculosis, and smoking status and history;
- A physical examination with special emphasis on the respiratory system;
- A chest X-ray (a single postero-anterior radiographic projection or radiograph of the chest at full inspiration recorded on either film [no less than 14 x 17 inches and no more than 16 x 17 inches] or digital radiography systems) interpreted and classified according to the International Labour Office (ILO) International Classification of Radiographs of Pneumoconiosis by a NIOSH-certified B Reader;
- A pulmonary function test to include forced vital capacity (FVC) and forced expiratory volume in one second (FEV1) and FEV1/FVC ratio, administered by a spirometry technician with a current certificate from a NIOSH-approved spirometry course;
- Testing for latent tuberculosis infection; and
- Any other tests deemed appropriate by the PLHCP.

Suburban Construction Management will make available medical examinations that include the aforementioned procedures (except testing for latent tuberculosis infection) at least every three years. If recommended by the PLHCP, periodic examinations can be more frequently than every three years.

Suburban Construction Management will ensure that the examining PLHCP has a copy of the OSHA Respirable Crystalline Silica Construction Standard, this program, and the

following information:

- A description of the employee's former, current, and anticipated duties as they relate to the employee's occupational exposure to Respirable Crystalline Silica;
- The employee's former, current, and anticipated levels of occupational exposure to Respirable Crystalline Silica;
- A description of any personal protective equipment (PPE) used or to be used by the employee, including when and for how long the employee has used or will use that equipment; and
- Information from records of employment-related medical examinations previously provided to the employee and currently within the control of Suburban Construction Management.

Suburban Construction Management will ensure that the PLHCP explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of each medical examination performed. The written report shall contain:

- A statement indicating the results of the medical examination, including any medical condition(s) that would place the employee at increased risk of material impairment to health from exposure to Respirable Crystalline Silica and any medical conditions that require further evaluation or treatment;
- Any recommended limitations on the employee's use of respirators;
- Any recommended limitations on the employee's exposure to Respirable Crystalline Silica; and;
- A statement that the employee should be examined by a Specialist if the chest X-ray is classified as 1/0 or higher by the B Reader, or if referral to a Specialist is otherwise deemed appropriate by the PLHCP.

Suburban Construction Management will also obtain a written medical opinion from the PLHCP within 30 days of the medical examination. The written opinion shall contain only the following in order to protect the employee’s privacy:

- The date of the examination;
- A statement that the examination has met the requirements of the OSHA Respirable Crystalline Silica Construction Standard; and
- Any recommended limitations on the employee's use of respirators.

If the employee provides written authorization, the written opinion shall also contain either or both of the following:

- Any recommended limitations on the employee's exposure to Respirable Crystalline Silica; and/or
- A statement that the employee should be examined by a Specialist if the chest X-ray is classified as 1/0 or higher by the B Reader, or if referral to a Specialist is otherwise deemed appropriate by the PLHCP.

If the PLHCP's written medical opinion indicates that an employee should be examined by a Specialist, Suburban Construction Management will make available a medical examination by a Specialist within 30 days after receiving the PLHCP's written opinion.

Suburban Construction Management will ensure that the examining Specialist is provided with all of the information that the employer is obligated to provide to the PLHCP.

Suburban Construction Management will ensure that the Specialist explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of the examination. The written report will contain:

- A statement indicating the results of the medical examination, including any medical condition(s) that would place the employee at increased risk of material impairment to health from exposure to Respirable Crystalline Silica and any medical conditions that require further evaluation or treatment;
- Any recommended limitations on the employee's use of respirators; and
- Any recommended limitations on the employee's exposure to respirable crystalline Silica.

In addition, Suburban Construction Management will obtain a written opinion from the Specialist within 30 days of the medical examination. The written opinion shall contain the following:

- The date of the examination;
- Any recommended limitations on the employee's use of respirators; and
- If the employee provides written authorization, the written opinion shall also contain any recommended limitations on the employee's exposure to Respirable Crystalline Silica.

Hazard Communication

Suburban Construction Management will include Respirable Crystalline Silica in the company's Hazard Communication Program established to comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Suburban Construction Management will ensure that each employee has access to labels on containers of Crystalline Silica and those containers respective Safety Data Sheets (SDS's).

All employees will be trained in accordance with the provisions of the OSHA Hazard Communication Standard and the Training Section of this program. This training will cover concerns relating to cancer, lung effects, immune system effects, and kidney effects.

Suburban Construction Management will ensure that each employee with the potential to be exposed at or above the Action Level for Respirable Crystalline Silica can demonstrate knowledge and understanding of at least the following:

- The health hazards associated with exposure to Respirable Crystalline Silica;
- Specific tasks in the workplace that could result in exposure to Respirable Crystalline Silica;
- Specific measures Suburban Construction Management has implemented to protect employees from exposure to Respirable Crystalline Silica, including

engineering controls, work practices, and respirators to be used;
- The contents of the OSHA Respirable Crystalline Silica Construction Standard;
- The identity of the Competent Person designated by Suburban Construction Management; and
- The purpose and a description of the company's Medical Surveillance Program.

Suburban Construction Management will make a copy of the OSHA Respirable Crystalline Silica Construction Standard readily available without cost to any employee who requests it.

Recordkeeping

Suburban Construction Management will make and maintain an accurate record of all exposure measurements taken to assess employee exposure to Respirable Crystalline Silica. This record will include at least the following information:
- The date of measurement for each sample taken;
- The task monitored;
- Sampling and analytical methods used;
- Number, duration, and results of samples taken;
- Identity of the laboratory that performed the analysis;
- Type of personal protective equipment (PPE), such as respirators, worn by the employees monitored; and
- Name, social security number, and job classification of all employees represented by the monitoring, indicating which employees were actually monitored.

Suburban Construction Management will ensure that exposure records are maintained and made available in accordance with 29 CFR 1910.1020. Exposure records will be kept for at least 30 years.

The employer shall make and maintain an accurate record of all objective data relied upon to comply with the requirements of the OSHA Respirable Crystalline Silica Construction Standard. This record shall include at least the following information:
- The Crystalline Silica-containing material in question;
- The source of the objective data;
- The testing protocol and results of testing;
- A description of the process, task, or activity on which the objective data were based; and
- Other data relevant to the process, task, activity, material, or exposures on which the objective data were based.

Suburban Construction Management will ensure that objective data are maintained and made available in accordance with 29 CFR 1910.1020. Objective data records will be kept for at least 30 years.

Suburban Construction Management will make and maintain an accurate record for each employee enrolled in the Medical Surveillance portion of this program. The record shall include the following information about the employee:

- Name and social security number;
- A copy of the PLHCPs' and/or Specialists' written medical opinions; and
- A copy of the information provided to the PLHCPs and Specialists.

Suburban Construction Management will ensure that medical records are maintained and made available in accordance with 29 CFR 1910.1020. Medical records will be kept under lock and key for at least the duration of employment plus 30 years. It is necessary to keep these records for extended periods because Silica-related diseases such as cancer often cannot be detected until several decades after exposure. However, if an employee works for an employer for less than one year, the employer does not have to keep the medical records after employment ends, as long as the employer gives those records to the employee.

PROGRAM EVALUATION

This program will be reviewed and evaluated on an annual basis by First Link Safety unless changes to operations, the OSHA Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153), or another applicable OSHA Standard require an immediate re-validation of this program.

APPENDIX 25.2

Suburban Construction Management

Respirable Crystalline Silica Exposure Control Plan

Project Name: _____

Competent Person: _____

Person completing the plan: _____

Date: _____

Description of tasks that have the potential to expose workers to silica at a level greater than the action level of 25 micrograms/ cubic meter:

_____

_____

_____

_____

Description of control measures put in place to control the silica exposures for the tasks (these may be specified Exposure Control Methods mandared from Table 1 of the Silica Standard):

_____

_____

_____

Work Practices (remember to include those tasks required for controls to be fully & properly implemented such as cleaning vacuum system filters regularly):

_____

Housekeeping Methods:

_____

Procedures to restrict unauthorized entry into silica work areas:

_____