



# **SUBCONTRACTOR SAFETY PROGRAM**

# Downing Construction, Inc.

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## **LEGAL DISCLAIMER**

The purpose of this program is to provide information as general reference material concerning the subject. This information is for educational purposes only and is not intended to be a substitute for legal advice. Since it is not possible to include specific instructions for every situation, safety and health condition, or local regulation, always remember that the safe common sense way is better than the wrong way. When in doubt, ask your supervisor. This program may not meet all of OSHA's or other government requirements. The information is general in nature and the specific facts of any legal problem may vary the applicability of such material. Specific legal questions should be addressed to the attorney of your choice.

## **SAFETY PROGRAM STATEMENT**

DATE: Tuesday, August 08, 2017

At Downing Construction, Inc., our workers, subcontractors, and their families come first. The safety and health of all subcontractors is a primary area of focus for Downing Construction, Inc. We will work diligently to take all practical steps to safeguard our subcontractors from accidents and to maintain an effective safety program.

The objective of our safety program is to be able to provide a framework of policies and procedures that aim to keep injuries and illness to a minimum. Our goal is ZERO accidents and injuries. We will continue to strive to provide a workplace free of recognized hazards. We will provide all practical resources as outlined in our safety program to allow our subcontractors the opportunity to align with our high standards for a safe and secure work environment.

Our subcontractors share the responsibility of safety. Safety requires cooperation not only between supervision and subcontractors, but between all Downing Construction, Inc. workers and our subcontractors. The key to making this a successful safety program is the subcontractors' commitment to ensuring a safe work environment. Subcontractor ideas and suggestions are always welcomed and appreciated. All subcontractors of Downing Construction, Inc. have the authority to take corrective action for any condition that they feel could jeopardize the safety or health of other persons affected by our operations.

Thank you to each and every person who helps represent Downing Construction, Inc. every day. We are grateful to you all and appreciate your commitment to our safety program.

One Person. One Team. One Family.

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**Denis Frischmeyer**  
Partner

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**Joseph Butler**  
Partner

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**Justin Brown**  
Partner

### **Downing Construction, Inc. Safety Mission**

Our commitment stems from our passion for continuous improvement. We take pride in partnering with our team members to provide a safe working environment.

## **ACCOUNTABILITY & RESPONSIBILITIES**

### **MANAGEMENT RESPONSIBILITIES**

Downing Construction, Inc. is fully responsible for establishing, implementing and maintaining an effective safety program. This is true both in a practical and legal sense. In our company, a Safety Management Team has been assembled, comprised of workers at all levels of duties. A safety director has been appointed to direct the program. However, assigning responsibilities to others never removes the subcontractor or their workers from the responsibility of assuring the safety and health of everyone while at the workplace. The responsibilities spelled out for invited subcontractors below are to be considered as **minimum**:

### **INVITED CONTRACTORS**

Invited contractor covenants and agrees to comply fully with the provisions of all statutes, rules and regulations of the State and local governments and agencies in which the project is located pertaining to safety & health and to the maintenance of safe working conditions in connection with the Subcontract work. The Invited contractor will comply with the applicable provision of the Occupational Safety and Health Act of 1970 as amended and must establish safe and healthful working conditions for its workers in connection with the subcontract work according to all occupational safety and health standards applicable thereto issued by the Secretary of Labor during the time of performance of such work. Subcontractor further agrees to notify Downing Construction Inc. in writing as to any unsafe working conditions that may exist in any areas at the job site where subcontractor's work is being conducted.

Proper PPE will be worn at all times while working for Downing Construction Inc. Other protective equipment will be furnished by the Invited contractor when required. Each subcontractor worker must be instructed in the proper use of such equipment, and all such equipment will be worn when operations require it. Protective equipment must be maintained in a safe working condition at all times and defective equipment must be replaced immediately.

## **SUBCONTRACTOR RESPONSIBILITY AND PARTICIPATION**

Subcontractor responsibility and level of participation is a direct result of the judgment and management style of executive and operating management. The guidelines provided in this program are representative of current "best practices".

### **Subcontractors**

Subcontractors have a responsibility for the safety program much like that of Downing Construction, Inc. workers. They are required as a condition of the subcontract to conform to all policies and rules. An subcontractor's responsibility to their workers is to require them to take due care in their work to prevent injuries to themselves and fellow workers. In addition, each subcontractor will:

1. Report all unsafe conditions and acts to Downing Construction, Inc. supervisor.
2. Report all injuries to Downing Construction, Inc.
3. Keep work areas clean and orderly at all times.
4. Follow established procedures during an emergency.
5. Make sure all instructions are understood before starting work and ask questions for clarification whenever they are not fully understood.
6. Learn to lift and handle materials properly.
7. Avoid engaging in horseplay and distracting other workers, especially while they are using machinery and equipment.
8. Review the informational and educational material distributed in the work area by the Downing Construction, Inc. supervisor.
9. Know where and how medical help may be obtained.
10. Operate only the machinery for which they have been trained and are authorized.
11. Wear personal protective equipment (PPE) when required.
12. Prevent damage or destruction of any warning or safety device.
13. Participate in safety activities / processes to which they are appointed.

### **Substance Abuse**

Downing Construction, Inc. prohibits the use, possession or distribution on its jobsites, premises, facilities or work places of any of the following: alcoholic beverages, intoxicants and narcotics, illegal or unauthorized drugs (including marijuana), "look-alike" (simulated) drugs, and related drug paraphernalia, and any other substances that can or do cause impairment

## Disciplinary Procedures

Even the best safety program with strong commitment will be ineffective without enforcement through established disciplinary procedures. Downing Construction, Inc. supervisors have the assigned duty to assure compliance with the company's safety program and has the authority necessary to enforce it. Violations will be dealt with in a firm, fair and consistent manner. Our enforcement system includes warnings, days removed from project, and dismissal for those who do not comply.

Look at safety rule compliance in the same manner you would view other work activities. An worker who refused to perform a work required task would receive a disciplinary action.- Safety violations must be handled in the same way. Refusing to use fall protection when company policy requires it is a flagrant violation of policy and comparable to ignoring work activity.

## Disciplinary Action

Downing Construction, Inc. values the personal safety of all team members and supports the disciplinary actions listed below for persons who choose not to work safely, or who endanger the safety of their co-workers. All management must enforce this policy and, when necessary, take disciplinary action. In the event that a subcontractor deliberately fails to follow the prescribed safe work procedure or use the prescribed safety equipment the following actions will apply:

1. Verbal warning.
2. **First Violation** – \$100 fine
3. **Second Violation** – \$200 fine
4. **Third Violation** – \$300 fine and removal from the site for the day.

OR

Should any subcontractor workers be found to have willfully committed a serious safety violation, they will be removed from the project.

## CODE OF SAFE PRACTICES

1. All persons shall follow the safe practices rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the management.
2. Supervisors shall insist on persons on site observing and obeying every rule, regulation, and order as necessary for the safe conduct of work, and shall take such action as is necessary to obtain observance.
3. Anyone known to be under the influence of drugs or intoxicating substances shall not be allowed on the job while in that condition.
4. Horseplay and scuffling, is prohibited.
5. Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
6. No one shall knowingly be permitted or required to work while their ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the individual or others to injury.
7. No one shall enter voids, chambers, tanks, or other similar places that receive little ventilation, unless you have been properly trained to enter confined spaces and it has been determined that it is safe to enter.
8. Persons on site shall be instructed to ensure that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies promptly.
9. Workers shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties.
10. All injuries shall be reported promptly to the supervisor so that arrangements can be made for medical or first aid treatment.
11. When lifting heavy objects; lift with your legs, not your back.
12. Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.
13. Material, tools or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.
14. Workers shall cleanse thoroughly after handling hazardous substances, and follow special instructions for those products.
15. Before leaving any job, be sure it is in a safe condition.
16. Work shall be so arranged that workers are able to face ladder and use both hands while climbing.
17. Gasoline shall not be used for cleaning purposes.
18. No burning, welding, or other source of ignition shall be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from their supervisor.
19. Any damage to scaffolds, equipment, or other supporting structures shall be immediately reported to the supervisor and repaired before use.
20. Appropriate permanent or portable fire extinguishers shall be kept at or near the work location.
21. Always use the proper respiratory protection when needed. If you aren't sure see your supervisor after reading the SDS for the product you are applying or using. Only authorized workers may use a respirator.



22. Check with your supervisor for the proper protective clothing or personal protective equipment i.e. gloves, goggles, protective suits, barrier creams.
23. Make sure that you follow all safety precautions on the SDS and Environmental Regulations when using any chemicals.
24. Use proper fall protection when work requires it.
25. Wash hands and face thoroughly before eating.
26. Wash and change working clothes often.

## **PERSONAL PROTECTIVE EQUIPMENT**

### **Head Protection**

Hardhats will be worn 100% of the time while present on any active jobsite. An active jobsite will be defined as the project start date through receipt of substantial completion.

### **Eye & Face Protection**

Safety glasses must be worn whenever pneumatic tools are being used, at a minimum. Side shields are required on prescription eyewear. Face shields (over safety glasses) or safety goggles are required when grinding, chipping, cutting, etc.

### **Hearing Protection**

Hearing protection (earplugs) shall be worn in high noise areas and while operating noisy equipment.

### **Hand Protection**

Work gloves are required while cutting, fitting, and handling sheet metal, rough lumber, metal bands and other materials likely to cause hand injuries.

### **100% Fall Protection**

Whenever you have a potential fall of six (6) feet or higher 100% fall protection is required. Guardrails, nets, hole covers or personal fall arrest systems will be used for fall protection. See specific details of fall protection requirements detailed later in this manual.

### **Clothing**

Appropriate work clothes are required. Tank tops and shorts are not allowed. (Shirts must cover the shoulders). No clothing is allowed with offensive pictures or wording. You represent Downing Construction, Inc. while on the job and we expect a professional image.

## **Respiratory**

To control those occupational diseases caused by breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors, the primary objective will be to prevent atmospheric contamination. This will be accomplished as far as feasible by accepted engineering control measures (i.e. enclosure of the operation, ventilation, and substitution of less toxic materials). When effective engineering controls are not feasible, or while they are being instituted, appropriate respirators must be used.

## **Safety Footwear**

Hard soled footwear with closed toe to be worn by all workers that spend a predominant amount of their daily responsibilities on a job site. No tennis shoes.

## **Cleaning and maintenance**

All PPE must be kept clean and properly maintained. This is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE must be inspected, cleaned, and maintained at regular intervals. Defective or damaged PPE must never be used.

### **GENERAL SAFETY REQUIREMENTS USE OF TOOLS AND EQUIPMENT**

1. All tools and equipment shall be maintained in good condition.
2. Damaged tools or equipment shall be removed from service.
3. Only appropriate tools shall be used for the job.
4. Wrenches shall not be altered by the addition of handle-extensions or "cheaters".
5. Files shall be equipped with handles and not used to punch or pry.
6. A screwdriver shall not be used as a chisel.
7. Do not remove guards from portable grinding tools or break off ground leads on portable electric tool plugs.
8. Portable electric tools shall not be lifted or lowered by means of the power cord. Ropes shall be used.
9. Electric cords, both on equipment and extensions cords, shall be inspected at time of each use. Cuts in the shielding and/or missing/bent ground plugs on cords will deem that tool/cord as "DEFECTIVE" and in need of repair or replacement. Cords shall not be exposed to damage from vehicle traffic.
10. In locations where the use of a portable power tool is difficult, the tool shall be supported by means of a rope or similar support of adequate strength.
11. Air hoses shall not be connected at compressors until air pressure has been bled off.

## LADDERS

### General Hazards

There are several potential hazards when you work with a ladder:

1. Poor condition: If a ladder is missing parts or has parts that are not intact, it's not going to be able to support a person safely. Frequent inspections are a key part of ladder safety.
2. Improper selection: Not every ladder is right for every use. You should be aware of a ladder's weight and height limits. It's also critically important to never use a metal ladder near live electrical wires.
3. Improper use: Ladders are designed to get you to a higher level. They are not platforms, scaffolds, skids, or braces and should be used only for their purpose. In addition, when you have to climb, use a ladder and not a chair, box or other substitute. The way you use a ladder can also promote safety or cause accidents.

### Identifying Hazards

Always inspect a ladder before you use it and include ladders in any general safety inspection. Check that:

1. Steps and rungs are all in place, intact, have slip resistance surfaces, and are firmly attached.
2. Support braces, bolts and screws are all in place and tight.
3. Rope is not worn or frayed.
4. Spreaders or other locking devices are in place.
5. Splinters or sharp edges are removed.
6. Safety feet are in place.
7. Metal ladders are not dented or bent.
8. If a ladder had anything missing or broken, don't use it.

### Protection Against Hazards

The first step in protection from safety hazards with ladders is to select the right ladder for the job. Ladders are rated by how much weight they can safely hold. The weight limits include both you and any equipment you're carrying.

1. I-A means it can hold 300 pounds (heavy duty)
2. I holds 250 pounds (heavy duty)
3. II holds 225 pounds (medium duty)
4. III holds just 200 pounds (light duty)

**No ladder with a rating less than 250 pounds shall be permitted on any Downing Construction, Inc. jobsite.**

Ladder height restriction requirements:

1. A stepladder should be no more than 20 feet high
2. A one-section ladder should be no more than 30 feet
3. An extension ladder can go to 60 feet, but the sections must overlap

## **Ladder Setup**

Although you've used ladders numerous times, you may not be aware that there is a correct way to set one up. Following this procedure will go a long way toward preventing accidents:

1. Place the ladder on level surface; use wide boards under it if you're on soft ground.
2. Set the feet so they're parallel with the surface the ladder rests against.
3. Extend the ladder so there's at least 3 feet above the top support.
4. Anchor the top. Either tie the bottom or have someone hold it while you climb to secure it.
5. Don't rest the ladder on a window or window sash or place it in front of a door unless it's locked or blocked.
6. Position the ladder so that the distance from the ladder base to the wall is one-fourth the length of the ladder. Remember the 4 to 1 rule.
7. Position an extension ladder before you extend it.
8. Never place a ladder in front of a door unless it's locked or blocked.

## **Safety Procedures**

Once the ladder is set up properly, it's up to you to use it properly so you don't get hurt. As a starter, you shouldn't use a ladder at all if you have a fear of heights or a tendency toward dizziness or fainting. With that in mind, here are the guidelines from safe ladder use:

1. Only have one person on a ladder at a time.
2. Face the ladder while climbing up or down and hold the side rails with both hands.
3. Carry tools up or down on a belt or with a rope or hoist, not in your hands.
4. Work with one hand on the ladder, keeping your tools in a hanger or holder.
5. Don't step on the top two steps of a stepladder or top three rungs of a straight ladder.
6. Keep your body centered on the ladder so your belt buckle is between the side rails.
7. Don't move a ladder while you're on it.
8. Keep your own movement on a ladder slow and cautious.

## **GROUND FAULT CIRCUIT INTERRUPTER (GFCI) PROTECTION**

1. All workers utilizing power tools on jobsites will be required to use GFCI's whenever plugging in to permanent or temporary power sources. Each worker will clean, maintain, and inspect their GFCI's on a weekly basis.

2. All temporary power is to be supplied with GFCI protection, but when future permanent electrical outlets are used with an extension cord, it is your responsibility to verify that it is a GFCI protected outlet or circuit.

### **PERSONNEL LIFTS**

1. Do not use any equipment until you have been specifically trained as an operator.
2. Occupancy by more persons that approved by the manufacturer of the equipment is not permitted.
3. You must tie off for fall protection with a harness and a lanyard secured to the manufacturer's required anchor point of the platform.
4. Stand only on the platform floor. Using a ladder, bucket, etc. or standing on the top rail, mid rail, or toe board is not allowed.
5. Rigging from the platform or boom is not allowed.
6. Do not climb out of the platform to an elevated work location - find another way to get there.
7. Follow all manufacturers' operating instructions and make sure the operator's manual is stored on the unit.

### **GENERAL EQUIPMENT NOTES**

1. Only authorized persons shall operate machinery or equipment.
2. Loose or frayed clothing, or long hair, dangling ties, finger rings, etc., shall not be worn around moving machinery or other sources of entanglement.
3. Machinery shall not be serviced, repaired or adjusted while in operation, nor shall oiling of moving parts be attempted, except on equipment that is designed or fitted with safeguards to protect the person performing the work.
4. Appropriate, lock-out procedures shall be used when working on machinery and equipment.
5. Earth moving equipment, hauling equipment and any vehicle with an obstructed rear view is required to have a backup alarm.
6. Seat belts are required at all times.
7. Cranes, forklifts, trucks, and any other construction equipment are not to be left unattended until shut down and secured to prevent unintentional movement. Only trained and qualified workers are to operate any equipment / vehicle.

### **FALL PROTECTION PROGRAM/SUB-PART L**

Only trained and qualified subcontractors of Downing Construction, Inc. are authorized to erect, dismantle, move, or alter scaffolding and are required to adhere to the requirements of OSHA standard 29 CFR 1926 Subpart L.

### **FALL PROTECTION PROGRAM/SUB-PART M**

All subcontractors and Downing Construction, Inc. workers are responsible to adhere to the requirements of OSHA standard 29 CFR part 1926 Subpart M. The purpose of this program is to provide adequate knowledge of the proper use of fall protection systems while working on elevated

work surfaces or any other work surfaces that might expose workers to falls of 6 feet or more. This will include all worksites that involve an exposure to at least one open side, open floor holes, holes in roofs, etc. from which workers can fall. The main scope of this program is to address work where heights of 6 feet are exceeded. The scope is not limited to this situation and addresses all situations where workers are working at 6 feet or more over an adjacent level.

Guardrail systems will be constructed by the following specifications:

The top edge of top rails, or equivalent guardrail system members, will be 42 inches plus or minus 3 inches above the walking/working level. When conditions warrant, the height of the top edge may exceed the 45-inch height. Midrails, screens, mesh, intermediate vertical members, or equivalent intermediate structural members will be installed between the top edge of the guardrail system and the walking/working surface when there is no wall or parapet wall at least 21 inches. Toe kick boards should be installed as well.

Personal fall arrest systems and their use will comply with the following:

1. Connectors will be drop forges, pressed or formed steel, or made of equivalent materials.
2. Connectors will have a corrosion-resistance finish, and all surfaces and edges will be smooth to prevent damage to interfacing parts of the system.
3. Dee-rings and snap hooks will be proof-tested to a minimum tensile strength of 5,000 pounds.
4. Dee-rings and snap hooks will be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.
5. Snap hooks will be sized to be compatible with the member to whom they are connected to prevent intentional disengagement of the snap hook by depression of the snap hook keeper by the connected member, or will be a locking type snap hook designed and used to prevent disengagement of the snap hook by the contact of the snap hook keeper by the connected member.
6. Unless the snap hook is a locking type and designed for the following connections, snap hooks will not be engaged:
  - Directly to webbing, rope or wire rope
  - Each other
  - To a D-ring to which another snap hook or other connector is attached
  - To a horizontal lifeline
  - To any object, which is incompatibly shaped or dimensioned in relation to the snap hook, such that unintentional disengagement could occur by the connected object being able to depress the snap hook keeper and release itself.
7. Work platforms with horizontal lifelines which may become vertical lifelines, the devices used to connect to a horizontal lifeline will be capable of locking in both directions on the lifeline.
8. Horizontal lifelines will be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.
9. Lanyards and vertical lifelines will have a minimum breaking strength of 5,000 pounds.
10. When vertical lifelines are used, each worker will be attached to a separate lifeline.

11. Lifelines will be protected against being cut or abraded.
12. Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet or less will be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
13. Ropes and straps (webbing) used in lanyards, lifelines, and strength components of body harnesses will be made from synthetic fibers.
14. Anchorages used for attachment of personal fall arrest equipment will be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per worker attached.
15. Personal fall arrest systems, when stopping a fall, will:
  - Limit maximum arresting force on a person to 1,800 pounds when used with a body harness
  - Be rigged such that a person can neither free fall more than 6 feet nor contact any lower level
  - Bring a person to a complete stop and limit maximum deceleration distance a person travels to 3.5 feet
  - Have sufficient strength to withstand twice the potential impact energy of a person free falling a distance of 6 feet, or the free fall distance permitted by the system, whichever is less.
  - The attachment point of the body harness will be located in the center of the wearer's back near the shoulder level, or above the wearer's head.
  - Harnesses and components will be used only for personal protection (as part of a personal fall arrest system or positioning device) and not to hoist materials.
  - Personal fall arrest systems and components subjected to impact loading will be immediately removed from service and will not be used again for personal protection until inspected and determined by a competent person to be undamaged and suitable for reuse.
  - Personal fall arrest systems will be inspected prior to each use for wear, damage and other deterioration, and defective components will be removed from service.
  - Personal fall arrest systems will not be attached to guardrail systems, nor will they be attached to hoists except as specified in other parts of this procedure.
  - When a personal fall arrest system is used at hoist areas, it will be rigged to allow the movement of the person only as far as the edge of the walking/working surface.
  - **NOTE:** Body belts and single action snap hooks are not authorized as part of a fall protection system.
16. If guardrail and personal fall arrest systems cannot be installed or utilized, a safety monitoring system shall be put in place as required per OSHA standards.

In the event a person falls or some other related serious accident occurs, (i.e. a near miss) the supervisor and safety director will investigate the circumstances of the fall or other incident to determine if the protection plan needs to be changed or altered. The company will implement those improvements/changes to prevent similar types of falls or incidents.

## TRENCHING AND EXCAVATIONS

OSHA requires that all excavations over five feet deep be sloped, shored, shielded or otherwise supported. When soil conditions are unstable, excavations less than five feet must also be sloped, shored, or shielded.

Elimination of trenching and excavation failures is a simple matter. Failures will not happen if we learn what causes them, plan accordingly, proceed in keeping with the standards, and insist on safe work practices. Through a system of options, you can select methods of personal protection.

One method of ensuring the safety and health of workers in a trench or excavations is to properly slope the sides. Sloping varies with different kinds of soil and must be determined on each individual operation. When an excavation has water conditions, silty material, or loose boulders, or when it is being dug in areas where erosion, deep frost, or slide planes are apparent, the angle of repose must be flattened. Sloping is the oldest and still popular method of preventing cave-ins. Sloping means that the sides of an excavation are cut back to "maximize allowable slope" from which they will not collapse. The following are some options for sloping:

1. Slope to the angle required by the standard for Type C, which is the most unstable soil type.
2. Use tabulated data prepared by a registered professional engineer.
3. Have a registered professional engineer design a sloping plan specifically for that job. It should be noted that any excavation over 20 feet in depth requires it is designed by a registered professional engineer. Spoil piles are to be at least two feet from the edge of the trench and should likewise be sloped to a safe angle

Shoring is the second means of providing cave-in protection. In shoring, the sides of the excavations are braced up by structural components strong enough to prevent cave-in. There are numerous ways to shore up excavations. Screw jacks, aluminum pneumatic, aluminum hydraulic, sheet pile and combinations of the methods are commonly used. Commonly used in utility work, a trench box is a prefabricated movable trench shield composed of steel plates welded to a heavy steel frame. OSHA standards permit the use of a trench box as long as the protection it provides is equal to or greater than the protection that would be provided by a standard shoring system. As in sloping, the standard provides options as follows:

1. After determining the soil type, the excavator may use charts provided in the standard for shoring up to depths of 20 feet
2. Use the manufacturer's tabulated data
3. Have a plan designed by a registered professional engineer.

Excavations and shoring systems must be inspected daily by a competent person. Inspections also are required after rainstorms or any change in condition that can increase the possibility of a cave-in or slide. If dangerous ground movements are apparent, such as subsidence or tension cracks, all work in the excavation must be stopped until the problem has been corrected.



In case of an emergency, workers must be able to leave the trench quickly. OSHA regulations state when persons are required to be in trenches four feet deep or more, adequate means of exit, such as a ladder or steps, shall be provided and located so as to require no more than 25 feet lateral travel. Ladders must be in good condition, extend from the floor of the trench to three feet above the top of the excavation, and be secured at the top.

### **JOB RELATED INJURY**

It's imperative that the proper medical treatment is provided in the event of a job-related injury. **If life threatening, call 911.** Otherwise seek the proper medical treatment.

#### **Incident: (Injuries / Illness, Near Miss, Property Damage)**

Report any incident, no matter how minor, to Downing Construction, Inc. supervisor immediately.

### **FIRST AID / CPR**

Subcontractors are responsible for providing their own first aid kits and a trained first aid/CPR worker on site.

# Downing Construction, Inc.

## Hazard Communication Standards

The Occupational Safety and Health Administration's Hazard Communication Standard has been extended to cover all industries including construction. This is a federal requirement, and we must abide by the requirements. We are responsible to implement the program plan.

The safety and health of our workers remain a top priority. We are challenged to make this program work in a positive manner by identifying hazardous chemical products, training our workers in their proper use and insuring that protective equipment is available and worn.

### Hazard Communication

1. Cover the Downing Construction, Inc. Hazard Communication Program.
2. You must know the hazards associated with using or storing any chemical prior to use.
3. You must take the required steps associated with using or storing any chemical prior to use to eliminate and/or protect yourself and others from chemical exposure.
4. **If you are unfamiliar with a chemical that you will be using, you must ask your supervisor or safety representative.**
5. All hazardous chemical containers must be labeled and stored properly.
6. Pay special attention to the location of SDS and how to read and understand them. Show the workers where the SDS are located.

### Housekeeping

Good housekeeping is one of the easiest and most important ways to participate in this project's safety program.

1. Good housekeeping must always be a priority.
2. All equipment, materials, and debris must be kept cleared from all work areas, passageways, and stairways.
3. Work areas will be left clean at the end of each day.
4. Access to exit doors, elevators, electrical panels, fire extinguishers and other emergency equipment must not be blocked at any time.

### Projecting Materials

All reinforcing steel (rebar) and other projecting materials must be capped, bent over, or otherwise protected to prevent impalement.

## **HAZARD COMMUNICATION PROGRAM**

### **General Information**

In order to comply with the "Right to Know" regulations of the Occupational Safety and Health Administration as well as our state standard on "Hazard Communication".

### **Objective**

1. To safeguard workers' health by providing a guide for compliance.
2. To provide workers with the necessary information concerning health and physical hazards of chemical materials in use at our work sites.
3. To comply with Federal OSHA Regulations CFR 1926.59.

### **Scope**

1. Listing of the chemical products that will be handled, used, or stored on job site location or company property.
2. Assure that appropriate identifying labels are on containers of hazardous chemicals being used and handled.
3. Safety Data Sheets (SDSs) will be required and procured for all hazardous chemicals which workers will encounter.

### **Safety Data Sheets (SDS)**

1. Contractors are responsible for obtaining and maintaining the data sheets system for their company.

### **Labeling**

1. All containers of hazardous materials, regardless of size, must be labeled or tagged.
2. Each contractor shall ensure that each container of hazardous chemicals they bring on site is labeled, tagged or marked with the following information:
  - Identity of the hazardous chemical(s).
  - Name of substance in the container.
  - Appropriate hazard warnings.
3. Name and address of the manufacturer or distributor.
4. Original labels on containers containing hazardous chemicals shall not be removed.
5. If a different material is placed in the container, the label for the hazardous material contents must be changed to reflect the contents of the container.

## **Hazardous Non-Routine Tasks**

Normally workers do not perform hazardous non-routine tasks. If workers are asked to perform non-routine task involving chemicals, they will be given information by their supervisor about hazardous chemicals to which they may be exposed during such activity prior to the start of the task. This information will include:

1. Specific chemical hazards and exposures.
2. Protective measures the worker can take.
3. Measures the company has taken to lessen the hazards including protective equipment, presence of another worker, and emergency procedures.

## **Informing Contractors**

It is the responsibility of the Downing Construction, Inc. to provide other contractors affected by daily operations the following information:

1. Hazardous chemicals to which they may be exposed while on the job site.
2. Specific chemical hazard exposures.
3. Precautions the workers may take to lessen the possibility of exposures by usage of appropriate protective measures.

## **Notifying Local Public Safety Agencies**

It will be the responsibility of each contractor to notify Downing Construction, Inc. and the appropriate public safety agencies, if necessary, of hazardous materials used at this location.

## **Responsibility**

Downing Construction, Inc. is responsible to implement the Hazard Communication program on each assigned project. Each worker will accept responsibility for safely performing his/her work in accordance with the established safe work practices and precautions outlined on hazardous materials labels.

**GUIDELINES FOR ACTION WHEN THE OSHA INSPECTOR  
(COMPLIANCE SAFETY AND HEALTH OFFICER) ARRIVES**

**GENERAL PROCEDURES**

Downing Construction, Inc. would prefer that all subcontractors and their workers remain on site in the event of an OSHA inspection. All subcontractors and their workers should defer to Downing Construction, Inc. supervisors during an OSHA inspection. No subcontractor should give direction/approval for an OSHA inspector to gain access to a project site without approval from Downing Construction, Inc. personnel.