
**EMPLOYEE**

# SAFETY PROGRAM

# Downing Construction, Inc.

## Safety Program

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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 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 employees and their families come first. The safety and health of all employees is a primary area of focus for Downing Construction, Inc. We will work diligently to take all practical steps to safeguard our employees 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 employees the opportunity to align with our high standards for a safe and secure work environment.

Our employees share the responsibility of safety. Safety requires cooperation not only between supervision and employees, but between each employee and our sub-contractors. The key to making this a successful safety program is the employees' commitment to ensuring a safe work environment. Employee ideas and suggestions are always welcomed and appreciated. All employees at Downing Construction, Inc. have the authority to take corrective action for any condition that they feel could jeopardize the safety or health of our employees or any 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.

| | | |
|---|---|---|
| **Denis Frischmeyer** | **Joseph Butler** | **Justin Brown** |
| Partner | Partner | 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.

## NEW EMPLOYEE ORIENTATION

### Objective

To assure that all new employees receive necessary information. OSHA requires Downing Construction, Inc.to provide a work area free of known or predictable safety and health hazards. The OSHA act also requires you to follow all safety / health regulations and safety training programs Downing Construction, Inc. implements.

### Introduction

Accidents cost time and money, but more importantly, they can cause unnecessary injury and severe personal loss. We are committed to achieving safety excellence. To do this, a goal of **"Zero Injuries"** has been set for our company.

### Attendance

Every new employee is required to attend orientation. No new employee will be allowed to work prior to completing orientation.

### Responsibilities

The safety director or a designated representative are responsible for assuring that required training is conducted.

### Documentation

The employee will sign and date the acknowledgement. A copy of the signed verification sheet will be forwarded to the safety director where it will be placed in your employee file.

### General Purpose

New employee orientation sets the tone for safety on construction sites. Downing Construction, Inc. recognizes construction can be a potentially hazardous industry and that new employees are subject to work area hazards. While some are experienced in the construction industry, others may be new to the industry. Everyone needs to know the hazards specific to the job or jobsite conditions. The objective of employee orientation is to inform you of jobsite and general safety rules and procedures. The safety director is assigned to cover orientation duties although he or she may delegate this assignment. The Safety director generally outlines specific safety orientation procedures to be followed by the foreman and other employees assigned to the training function. The safety director will follow-up to make sure training is satisfactory. The safety director or delegate will distribute company/specific jobsite safety materials to you and explain the contents thoroughly. You will be allowed sufficient time to ask questions and to clarify safety rules or procedures. Any required signatures to verify employee training must be obtained and forwarded to the company Safety director.

## Employee Responsibilities

You are the central figure into the safety program; therefore, you must work safely at all times. **Safety is your responsibility.** Always look out for the safety of yourself, your co-workers, and other trades working around you. **Good communication is a must.**

You must know the safe way to perform your work. You can accomplish this only by having a thorough knowledge of the work you are performing.

1. Learn to do your job correctly - The Safe Way.
2. You must apply your knowledge to your work.
3. Always use common sense. Think Before You Act.
4. Be aware of conditions surrounding your work area.
5. Constantly be alert to potential dangers or unsafe conditions that accompany your work.
6. When In Doubt - Consult Your Supervisor.

It's the responsibility of each employee to insure his or her own safety as well as the safety of others:

1. Learn the hazards of each assigned job and continue to suggest possible improvements in the methods of doing the job.
2. Analyze and plan each job before starting any work so as to identify hazards that may exist.
3. Do not take hazardous "short-cuts". Take the time to perform your work safely.
4. Help less experienced employees learn the safe and correct work methods.
5. Report the following to your supervisor immediately or as soon as possible:
    - All work-related illnesses and injuries.
    - All property damage incidents.
    - All hazards and near-miss incidents.
6. Obey all safety practices and procedures.
7. Mischievous acts can cause accidents and, therefore are forbidden.

## Problem Solving Procedure

To have an effective safety program, communication must take place at every level. When a safety problem arises, everyone in the company must know where and to whom to turn. Employees must know that each safety problem will be corrected. Let your supervisor know of any concerns.

## 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. For this reason, there are related responsibilities for various management personnel. In our company, a Safety Management Team has been assembled, comprised of employees at all levels of duties. A safety director has been appointed to direct the program. However, assigning responsibilities to others never removes the employer and the employer's executive management from the responsibility of assuring the safety and health of everyone while at the workplace. The responsibilities spelled out for various functions below are to be considered as **minimum**:

### Partners:

1. Assure development of, and support for, an effective safety program.
2. Prepare a safety program statement and communicate it to all employees.

### Director of Operations

1. Appoint someone to coordinate and/or direct safety program efforts.
2. Assure programs are in place to identify, assess and intervene in workplace hazard.
3. Participate in planned, periodic general safety inspections when applicable.
4. Review accident reports and investigations to guarantee that corrective and preventive measures are dealt with promptly.
5. Assure employee-training programs are developed and implemented which will prepare employees to perform their work safely.
6. Responsible for maintaining an updated OSHA 300A log and updated EMR information and for proper placement within office/field.

### Safety Director

The safety director has a direct reporting relationship to the director of operations. The specific responsibilities listed below are representative of Downing Construction, Inc. Construction Inc., safety director duties:

1. Be assigned, and assume, full responsibility for the direction and administration of the safety program.
2. Serve as managing chair for "Downing Construction, Inc.'s Safety Management Team".
3. Advise and counsel management in all necessary actions to reduce accidents and their causes.
4. Develop and implement a system for identifying, assessing, and eliminating or controlling workplace safety and health hazards.

5. Provide guidance and direction to all employees in the application of the safety program.
6. Consult with technical support staff and/or supervisors in the design and use of equipment and related safety standards.
7. Prepare programs for, routine and periodic inspections of the jobsites and equipment (including vehicles) to detect existing or potential hazards, and recommend corrective or preventative measures where needed.
8. Insure proper PPE equipment is made available, and employees must be trained in its use.
9. Assist supervisors and employees in conducting safety inspections, making sure that appropriate documentation and follow-ups are made.
10. Represent the company at safety meetings while serving as safety contact and safety concern investigator/evaluator for all employees.
11. Stop imminently dangerous hazardous operations when prescribed safety precautions are not in place or being enforced.
12. Counsel management, supervisors and safety management team members about safety meetings and provide resources for the same.
13. Insure all record keeping is maintained, as required by state or federal codes, including inspection records and training records.
14. Provide training resources and/or opportunities for any employee operating any company construction equipment vehicles including forklifts, skid steer loaders, and the like.
15. Identify special training requirements for all safety and health elements of the work process, making sure that related resources are available, and conduct the training whenever supervisors do not have the related expertise.
16. Represent Downing Construction, Inc. at all OSHA inspections when capable
17. Oversee Downing Construction, Inc.'s CPR and First Aid Training Program annually and maintain records.

**Safety Management Team**

The Safety Management Team is comprised of Downing Construction, Inc. employees at various levels of employment. The purpose is to give every area of employment a voice, and opportunity to directly affect Downing Construction, Inc.'s safety program. Duties include but are not limited to:

1. Once appointed, a team member will serve a two-year term.
2. The team will be comprised of equally of new members and legacy members at all times.
3. Meet quarterly each year to evaluate Downing Construction, Inc.'s safety program.
4. Assist as support and back-up for the safety director.
5. Identify and implement all safety training.
6. Participate in training to further enhance Downing Construction, Inc.'s safety program.

**Project Superintendent**

Project superintendents are responsible for the safe actions of persons on their construction site and the safe performance of machines and equipment within the construction site. They also are responsible for enforcing the safety policy to avoid incidents. Specific responsibilities of the project superintendent are:

1. Assume responsibility for the safety of persons on site throughout their appointed construction sites.
2. Assure job tasks are evaluated for hazard exposures.
3. Take the initiative in correction of hazards noted in personnel practices and work procedures, equipment and machinery utilization, materials handling storage and disposal, and the environment of work.
4. Make sure persons on site are aware of their responsibilities to the safety process and related supporting programs.
5. Assure that all safety policies and rules are fully complied with.
6. Enforce work policies and procedures by taking immediate and appropriate action for both performing and failing to perform according to established performance guidelines. This includes feedback, reinforcement and/or discipline in accordance with company policy.
7. Make sure that all employees and subcontractors/suppliers are fully informed of the Downing Construction, Inc. safety program.
8. Guarantee that all tools and equipment are inspected at frequent intervals by a competent person, and that they are kept in a safe and useable condition.
9. Conduct or participate in periodic safety training classes and jobsite safety audits.
10. Report all accidents and the necessity of receiving first aid treatment even in the case of a minor injury.
11. Ensure all protective devices and safety equipment are regularly inspected.
12. Make sure that all areas designated as hazardous are properly marked, and make sure that only qualified persons enter that area utilizing any required protective equipment.

**Project Manager/Project Engineers**

Project managers and engineers are responsible for ensuring project supervision carries out the safety program and provide the necessary support to aid supervision in this process. They are also responsible to review and discuss safety reporting with all management. Specific responsibilities include:

1. Conduct periodic safety review meetings with job site management.
2. Assume responsibility for implementing safety documents into contracts
3. Communicate safety infractions to subcontractor management.
4. Assist superintendent in enforcement of safety policies contractually.
5. Review and interpret accident and/or near miss reporting to create strategies to further eliminate or protect against further occurrences.
6. Aid in creating job specific safety plans.
7. Help in the creation of project emergency and severe weather plans.

## EMPLOYEE RESPONSIBILITY AND PARTICIPATION

Employee 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”.

### Employees

Employees have a responsibility for the safety program much like that of supervisors. They are required as a condition of employment to conform to all policies and rules. An employer’s responsibility to their employees is to require them to take due care in their work to prevent injuries to themselves and fellow workers. In addition, each employee will:

1. Report all unsafe conditions and acts to their supervisor or other designated person(s), such as the safety director.
2. Report all injuries to their immediate supervisor.
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 employees, especially while they are using machinery and equipment.
8. Review the informational and educational material distributed in the work area by supervision or the safety director.
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.
14. Notify any individual not adhering to the safety program of their infraction and inform them of the necessary corrective action

### 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. The safety director has 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, layoffs and dismissal for those who do not comply.

Look at safety rule compliance in the same manner you would view other work activities. An employee 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.

Field supervisors have the authority to assist in the enforcement of our company safety policy. They are on-site and in a position to take corrective action. Field supervisors must always be aware of safety. If a disproportionate share of OSHA violations or incidents occurs on a job, it's a good bet that safety practices are not a top priority. In such cases, supervisors will be confronted and appropriate corrections made.

## 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 an employee deliberately fails to follow the prescribed safe work procedure or use the prescribed safety equipment their supervisor must apply the following actions:

1. Verbal warning.
2. **First Violation** – Written warning, a copy to HR Manager.
3. **Second Violation** – One day off without pay for second written warning within a twelve-month period, copy to HR Manager.
4. **Third Violation** – Downing Construction, Inc. reserves the right to terminate employment.

OR

The director of operations has the discretion to bypass any or all of the actions mentioned above and proceed to termination of employment if the nature of violation has serious enough consequence to cause the employee or his/her associate employees death or serious bodily harm.

## 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. All employees shall be given accident prevention instructions.
4. Anyone known to be under the influence of drugs or intoxicating substances shall not be allowed on the job while in that condition.
5. Horseplay and scuffling, is prohibited.
6. Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
7. 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.
8. 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.
9. 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.
10. 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.
11. All injuries shall be reported promptly to the supervisor so that arrangements can be made for medical or first aid treatment.
12. When lifting heavy objects; lift with your legs, not your back.
13. Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.
14. 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.
15. Employees shall cleanse thoroughly after handling hazardous substances, and follow special instructions for those products.
16. Before leaving any job, be sure it is in a safe condition.
17. Work shall be so arranged that employees are able to face ladder and use both hands while climbing.
18. Gasoline shall not be used for cleaning purposes.
19. 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.
20. Any damage to scaffolds, equipment, or other supporting structures shall be immediately reported to the supervisor and repaired before use.
21. Appropriate permanent or portable fire extinguishers shall be kept at or near the work location.

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

## PERSONAL PROTECTIVE EQUIPMENT

PPE will be issued to all employees. Downing Construction, Inc. provides a hardhat, safety glasses, safety vest, and fall protection (when applicable to job duties). Also, provided when needed are first aid kits, hearing protection, and dust masks. Gloves and footwear are the responsibility of the employees. If the need for any other PPE arises, please contact the safety director.

Downing Construction, Inc. rules for PPE are as follows:

### 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 employees 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 and tagged “DEFECTIVE”.
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. Tag it as defective and remove it from service.

### 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.

**LASERS**

1. Only qualified employees shall be assigned to install, adjust, and operate laser equipment.

2. When potential exposure to direct or reflected laser light is greater than 0.005 watts (5 milliwatts), standard laser warning placards shall be placed and employees shall be provided with anti-laser eye protection devices.

## GROUND FAULT CIRCUIT INTERRUPTER (GFCI) PROTECTION

1. All employees expected to utilize power tools on jobsites will be provided their own personal GFCI. Each employee will be required to use GFCI's whenever plugging in to permanent or temporary power sources. Each employee 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.

## GRINDING

1. Always closely inspect any new abrasive wheel prior to mounting to ensure they are free form cracks or defects.
2. Always use safety goggles or a face shield when grinding, whichever will afford the best protection.
3. The tool rest on a pedestal grinder must always be set within 1/8-inch away from the wheel. The tongue guard must be adjusted to within ¼-inch of the wheel – when in doubt, see the supervisor.
4. Sheet metal and other small pieces of work must never be ground on a pedestal grinder.
5. Grinding must never be done against the side of the wheel.
6. Grinding wheels must not be used if the pores are clogged. The wheels must also be free of large chips and grooves. Have your supervisor show you how to dress the wheel.
7. When grinding with a portable grinder, position the grinding wheel so that the sparks and steel go away from the person doing the work.
8. Always wear hearing protection when grinding with a hand grinder.
9. Nonferrous metal should not be ground because of the danger of exploding grinding wheels, unless the grinding wheel is designed to grind these metals.

## CRANES

1. Inspect the crane and rigging before use.
2. Stay out from under overhead loads.
3. Maintain a minimum 10 feet clearance between the crane/load and overhead power lines. (Operator's need to review specific OSHA requirements on clearance).
4. Use red danger tape to barricade the crane superstructure swing radius.
5. Use tag lines to control all loads.

## 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 work 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. Employees shall not work under vehicles supported by bumper jacks or chain hoists without protective blocking that will prevent injury if jacks or hoists should fall.
6. Earth moving equipment, hauling equipment and any vehicle with an obstructed rear view is required to have a backup alarm.
7. Seat belts are required at all times.
8. 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 employees are to operate any equipment / vehicle.

## FALL PROTECTION PROGRAM/SUB-PART L

### Purpose

The purpose of this program is to provide the employees of Downing Construction, Inc. with adequate knowledge of the proper use of scaffold systems.

### Scope

This program addresses requirements of the OSHA standard 29 CFR 1926 Subpart L.

**Only trained and qualified employees of Downing Construction, Inc. are authorized to erect, dismantle, move, or alter scaffolding.**

## GENERAL REQUIREMENTS FOR PROPER SCAFFOLD USE

1. Provide firm footing and anchorage for scaffolds. Footing should be sound, rigid and capable of carrying the maximum intended load without settling or displacement.
2. Install guardrails and toe boards on all open sides and ends to platforms more than 6 feet above the ground or floor. Use proper guardrails that will support a 200 lb force for top-rails, 150 lb for mid-rails and 50lb for toeboards.
3. Scaffolds and their components should be capable of supporting at least four times the maximum intended load.
4. Planks should be at least 2" thick and 10" wide as well as lay with their edges close together. This will ensure it will be tight with no spaces through which tools or fragments of materials may fall. Use lumber that is properly inspected and graded as scaffold plank. Examine each plank for large knots, excessive grain slope, shakes, decay or other disqualifying defects.
5. Immediately repair or replace any scaffold including accessories such as braces, brackets, etc., damaged or weakened from any cause.
6. Secure and rigidly brace poles, legs, or uprights to prevent swaying and displacement.
7. Provide overhead protection for workers on a scaffold exposed to overhead hazards.
8. Provide an access ladder or equivalent safe access.
9. Never use shore or lean-to scaffolds.
10. In the event that a Downing Construction, Inc. employee deems a scaffold inadequate or unsafe, they are to immediately contact the project supervisor. If the project supervisor is a Downing Construction, Inc. employee, they are to contact the competent person in charge of the scaffold system immediately to make them aware of the safety concern.

## FALL PROTECTION PROGRAM/SUB-PART M

### Purpose

The purpose of this program is to provide the employees of Downing Construction, Inc. with adequate knowledge of the proper use of fall protection systems while working on elevated work surfaces or any other work surfaces that might expose the employee 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 our employees 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 employees of our company are working at 6 feet or more over an adjacent level.

### Scope

This program addresses the requirements of 29 CFR part 1926 Subpart M.

### General

The Project Supervisor will be responsible for assuring that the walking/working surfaces have the structural integrity to adequately support employees and their work. The Project Supervisor is also responsible for ensuring that adequate safety rail systems/fall protection measures are in place.

**Design Specifications**

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 high per the following contingencies:

1. Midrails, when used, will be installed at a height midway between the top edge of the guardrail system and the walking/working level.
2. Screens and mesh, when used, will extend from the top rail to the walking/working level and along the entire opening between top rail supports.
3. Guardrail systems will be capable of withstanding, without failure, a force of at least 200 pounds when applied within 2 inches of the top edge, in any outward or downward direction, at any point along the top edge. At no time during this load test will the top edge of the top rail defect to a height less than 39 inches above the walking/working level.
4. Midrails, screens, mesh, intermediate vertical members, solid panels, and equivalent structural members will be capable of withstanding, without failure, a force of at least 150 pounds applied in any downward or outward direction at any point along the midrail or other member.
5. Guardrail systems will be free of hazards that might puncture or lacerate employees or snag employees' clothing.
6. The ends of all top rails and midrails will not overhang the terminal posts, except where such overhang does not constitute a projection hazard.
7. Top rails and midrails will be at least one-quarter inch diameter or thickness to prevent cuts and lacerations. If wire rope is used for top rails, it will be flagged at not more than 6-foot intervals with high visibility material.
8. Manila, plastic or synthetic rope shall not be used for top rails or midrails.

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 employee 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 employee 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.

## OFFICE SAFETY

### General

1. To avoid tipping of file cabinets, only open one drawer at a time.
2. Desk drawers, filing, and storage cabinets should be kept closed when not in use.
3. Floors, work areas, and hallways shall be kept clear.
4. Chairs shall be kept in a safe condition (properly adjusted, wheels secured, etc.).
5. Inspect electrical wires periodically to be sure that plugs and/or cords are in safe operating condition.
6. Good housekeeping shall be maintained at all times.
7. Use a proper ladder any time you need to access areas above your reach.
8. Exercise care when using cutting devices.
9. Bookshelves and cabinets be substantially braced to prevent them from tipping.
10. Consult with the SDSs if you do not know the hazards associated with a particular chemical spill.

## 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.

## CLAIM REPORTING PROCEDURES

The following procedures will be used for reporting workers' compensation claims:

1. As soon as possible, and no more than 24 hours after the incident occurred, contact your Downing Construction, Inc. human resources manager to report the incident. If you are not able to make direct contact yourself, your supervisor or an immediate family member should make contact for you.

**Contact:**
Kandace Sage, HR Manager
Office: (515) 961-5386
Cell: (515) 808-3543
kandaces@downingconstruct.com

2. Complete the IA First Report of Injury with your human resources manager. You will be required to provide detailed information regarding the incident.
3. Attach any bills you may have when completing this form; however, do not hold a report awaiting the physician's report and/or bills.
4. The workers' compensation reporting form is designed to be completed and signed by the employer and not the employee. All questions should be answered as completely as possible.
5. Downing Construction, Inc. will do everything possible to handle all financial details directly with the treating provider's office and the insurance company.

**Incident: (Injuries / Illness, Near Miss, Property Damage)**
Report any no matter how minor to your supervisor immediately. A detailed report must be submitted to the safety director within 24 hours of the incident

## FIRST AID / CPR

1. Due to the fact that our operations may be located at remote locations and often over a few minutes from the nearest medical or emergency facilities, all employees of Downing Construction, Inc. need to know what to do in the event of an accident or emergency. Therefore, Downing Construction, Inc. offers this training to all its employees annually. At least one person at each site shall be required to complete First Aid / CPR training and be current. After an accident, the first aid care given to an individual before professional help arrives, is often lifesaving.
2. Being prepared to help others, the first aid responder is better prepared to care for themselves and others if they remain knowledgeable in the procedures of the company, its facilities, and the basic first aid techniques. Each site & truck will have a company provided first aid kit. First aid kits will also be provided at the main office.

## EMERGENCY PROCEDURES

In order to best handle a major emergency that might arise, two things need to be considered first.

1. The "Safety Management Team", will serve as the company's Emergency Response Team (ERT) and will all be trained to know the best procedures to handle the different emergencies.
2. Identify the major emergencies that could occur.

### Responsibilities of the Emergency Response Team (ERT)

1. Team to be headed by a selected leader.
2. Members should be selected so that at least one or more members are generally present anytime employees are working.
3. Items members must learn and know:
    - Be familiar with the entire physical facility
    - Be familiar with the chemicals used in facility
    - All emergency and rescue numbers, where and how to use
    - Location and how to operate fire extinguishers
    - Location and how to use the SDS book on chemicals
    - Accepted procedure regarding gas supply shutoff
    - Accepted procedure regarding electric supply shutoff
    - Location and how to turn off main water supply
    - Names of employees trained to do special rescue procedures
    - Where to locate and how to use First Aid supplies and equipment

## IN CASE OF EMERGENCY
## GENERAL PROCEDURE

1. First person at emergency will notify a member of the ERT of the emergency and then begin with the next steps of addressing the emergency.
2. First ERT member on scene will take charge and will take the following steps:
    - See that any emergency phone numbers needed are called.
    - If necessary, will see that employees are evacuated to designated area and head count taken.
    - Assess any serious medical problems.
    - Protect emergency site from traffic and try to stop any further injuries or damage.
    - See that area is made safe for traffic before allowing re-entry or notifying All Clear.

- ERT member in charge will make a report of emergency

**MEDICAL EMERGENCY**

1. Notify necessary medical assistance, ERT or other personnel needed to handle emergency.
2. Keep emergency area clear.
3. See that area is returned to safety for traffic.
4. ERT member in charge will do a report of the emergency.

**ACCIDENT EMERGENCY**

1. Notify necessary medical, fire or rescue personnel as needed.
2. Keep emergency area clear.
3. ERT member in charge will do a report on emergency.

**FIRE, ELECTRICAL AND/OR EXPLOSION EMERGENCY**

1. Keep calm, take a moment to size up the situation, but don't waste valuable time. If it's in your immediate area, sound the alarm - yell out FIRE! - then get yourself out and help get others out. Attempt to extinguish small fires only.
2. Fire extinguishers are located in all of our company's gang boxes and should be throughout the building (i.e. at stairway landings, within 50 feet of flammable liquid storage/dispensing areas, etc.).
3. Notify necessary medical and/or fire and rescue personnel as needed.
4. Turn off affected utilities at respective mains.
5. Keep area clear of traffic for emergency vehicles.
6. Rope area off.
7. ERT member in charge will do a report of emergency.

**CHEMICAL EMERGENCY**

1. Get medical assistance, if necessary.
2. BLOCK OFF AREA
3. Notify necessary ERT or other personnel needed to handle emergency.
4. Clean up area according to SDS sheet on chemicals involved, using approved safety equipment.
5. ERT member in charge will do a report of the emergency.

**WEATHER EMERGENCY**

1. Direct employees to safest area in case of alert.
2. In case of storm damage, person in charge will apply any of the above procedures as deemed necessary.
3. ERT member in charge will do report on emergency.
4. Tornado or other severe weather related emergency

- If outside or in outlining small buildings, move quickly to the nearest large facility or to a pre-designated tornado shelter.
- If inside, stay inside. Immediately move away from windows, door openings, and all exterior areas with large amounts of glass. Move toward the center of the building and into small interior rooms without glass, such as a restroom, interior conference room or closet.
- Move quickly, but remain calm. Use common sense. Be aware of the construction stage the building is in.
- After the incident is over report to the designated area for accountability.

## EMERGENCY INFORMATION

All Downing Construction, Inc. project sites with onsite offices will have a site-specific safety plan. As part of that plan, a predetermined meeting place will be identified in case of emergencies. This is critical in accounting for all employees. We don't want to send someone into a burning building looking for employees who have already exited. Emergency phone numbers and the project's address will be posted in our job trailers or offices. Plan should cover the attached Emergency Procedures Checklist; this list will address Fire, Ambulance, Police, and Utilities.

## EMERGENCY ESCAPE ROUTES

As construction progresses, emergency escape routes should be marked with exit signs. (Show employees where exits are located). Move quickly, but remain calm. Use common sense. Be aware of the construction stage the building is in.

## DEALING WITH THE PRESS

1. A Partner of Downing Construction, Inc. will either handle the press, or pick a spokesperson for Downing Construction, Inc.
2. Do not use "Off the record" or "No comment" at any time, but instead say "a representative from Downing will address the situation at a later time."

# 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 employees remain a top priority. We are challenged to make this program work in a positive manner by identifying hazardous chemical products, training our employees 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 employees 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 our employees' health by providing a guide for compliance.
2. To provide our employees 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 employees of this company will encounter, the master SDSs will be available at the office, and a copy will be available (where designated) at the job site for those chemicals to which employees could be exposed at that job site. SDS sheets are also available by phone applications and the internet.
4. Employees will be trained to recognized and interpret labels, warnings, color-coding, and signs affixed to containers that they might handle, in order to avoid and/or minimize potential hazards.

### Safety Data Sheets (SDS)

1. Downing Construction, Inc. is responsible for obtaining and maintaining the data sheets system for the company. These are available by website.
2. SDSs will be available electronically to all employees in their work area for review during all working hours.

### Labeling

1. All containers of hazardous materials, regardless of size, must be labeled or tagged.
2. The project superintendent shall ensure that each container of hazardous chemicals received 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 our employees do not perform hazardous non-routine tasks. If our employees 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 employee can take.
3. Measures the company has taken to lessen the hazards including protective equipment, presence of another employee, and emergency procedures.

**Informing Contractors**

It is the responsibility of the Downing Construction, Inc. to provide other contractors affected by our operation 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 employees 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 the Downing Construction, Inc. to notify 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 employee 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

1. Inspections will be conducted by OSHA **C**ompliance **S**afety and **H**ealth **O**fficers (CSHO) without advance notice except in unusual circumstances.
2. When the OSHA Compliance Officer arrives, at least one, but preferably **ALL** of the following persons are to be contacted:
    - Director of operations
    - Safety director
    - Project manager
3. If an OSHA Inspector comes onto the job site, direct them to the job site trailer or jobsite entrance. **You have the right** to ask for them to wait up to (1) hour for the appropriate Downing Construction, Inc. Safety Representative (DSR) to arrive. Unless the main office has given permission to proceed with the inspection.
4. Upon arrival of the OSHA Inspector (CSHO):
    - **DO NOT ALLOW ACCESS TO THE JOB SITE UNTIL THE MAIN OFFICE HAS GIVEN APPROVAL.**
    - Check the credentials of the CSHO and any other person (consultant) that may accompany the CSHO.
    - Determine reason for inspection.
        i. (i.e.: U.T. List, Complaint, or Visual Violation)
    - Find out what and where he/she will inspect.
    - If not already decided, ask the main office who on the job should accompany the inspecting officer during the inspection, if there is not sufficient time for a Downing Construction, Inc. Safety Representative (DSR) to arrive.
    - **Do not allow anyone to leave** the jobsite upon the arrival of the (CSHO) or during the inspection, until the inspection has concluded or the (CSHO) has released them.
5. On multi-employer sites, the CSHO will ask the general contractor's representative to identify the other contractors on site together with the names of the individuals in charge of their operations. The CSHO will ask that these individuals be contacted and that they come to a meeting at a suitable location.
6. An OSHA Compliance Officer carries US Department of Labor credentials bearing his/her photograph and a serial number that can be verified by calling the nearest OSHA office. OSHA Compliance Officers may not collect a penalty at the time of inspection or promote the sale of a product or service at any time. Anyone who attempts to do so is not an OSHA Compliance Officer.

## OPENING CONFERENCE

1. Compliance officers begin with a brief interview with the employer or his/her designated representative. Inspectors may interview anyone in private provided it does not interfere with the employee's work. Also, any employee may bring any conditions, which he/she believes violates a standard to the attention of the inspecting officer. **Note: employees do have the right not to be interviewed if they wish.**
2. The CSHO will inform the employer(s) of the purpose of the inspection. The CSHO will determine if the employees are represented by a recognized bargaining agent, and if so, will ensure that they are given the opportunity to participate in all phases of the inspection.
3. If the inspection is based on an employee complaint(s), the CSHO will provide a copy of the complaint(s) to the employer and employee representatives at the beginning of the opening conference.
4. The CSHO will most likely ask for a copy of your written Safety and HAZCOM program, a list of chemicals you have on the job site and where the Safety Data Sheets (SDSs) are located. Make sure you have these items available, but **only provide what the CSHO specifically asks for.**
5. At the opening conference, if needed the CSHO will also provide copies of the OSHA poster and with blank OSHA-300 forms as well as other applicable laws and regulations and informational **handouts** and materials.

## RECORDS REVIEW AND POSTING REQUIREMENTS

1. Have employee training records available and make sure they are up-to-date. This pertains particularly to Tool Box Safety Talks that you have held with our employees. **Only provide them if the CSHO asks for them.**
2. Never give photocopies of any company records to the CSHO, unless you are required to do so by warrant and then only with the approval from the main office.
3. Think twice before you volunteer any information about audits, studies, safety rules, etc., which you think would reflect favorably on you company in the eyes of CSHO. Often this information can be turned against you.
4. **NOTE:** Always take any requested records to the CSHO. Don't let him/her browse through your company records.
5. There are certain posters that must be posted. These include:
    - OSHA Job Safety and Health Poster
    - OSHA-300A form during the months of February 1 – April 30.
    - *Current citations, if any.
    - *Petitions for Modification of Abatement Date (PMAS).
    - Emergency telephone numbers.
    - Crane signals. If a crane is on site.

*These items would apply if the CSHO were conducting a follow-up inspection.

## WALK-AROUND INSPECTION

1. The main purpose of the walk-around is for the CSHO to become familiar with workplace operations, identify and collect information on potential safety and/or health hazards and observe employees' activities and interview them as appropriate.
2. You may consider having two management representatives accompany the CSHO – one to answer questions, the other to take notes. If so, make sure that only one person talks to the inspector. Don't get into a situation where your representatives provide conflicting information. It is important that management speaks with one voice.
3. **The most important thing is that the company representative knows in detail the safety policies and programs.** REMEMBER – IT IS THESE POLICIES THAT THE EMPLOYEES HAVE TO COMPLY WITH. These policies reflect how our employees have to conduct themselves on the job sites and the actions we can take against them if they don't comply. **The CSHO will look how well you implement what is written.**
4. Make sure you know of any previous OSHA inspections at your facility and the status of follow-up activities and/or corrective actions taken.
5. **Other suggested actions to consider during the walk around**:
   - Be cooperative and courteous, but do not offer any information other than to answer questions from the CSHO. Always remember that what you say can be used against you. Many OSHA violations are based on what you said during the inspection.
   - REMEMBER: STAY IN CONTROL – AFTER ALL, IT'S OUR BUSINESS BEING INSPECTED. If you're in doubt about anything, call time and seek advice.
   - Do not get into arguments with the CSHO as to what is required by an OSHA Standard. The CSHO may try to get you to agree that a certain way of doing things is a violation of OSHA Standards. If you go along you will most likely get cited.
   - Carry with you the same equipment that the CSHO has with him/her. This includes cameras, tape measures, video cameras, etc.
   - Whenever the CSHO takes a picture, take the same picture from the same angle. If the CSHO takes measurements, do likewise.
   - If the CSHO makes notes, ask what he/she has noted and make similar notation. If you are unable to determine exactly what the CSHO has written, at least make a note that the CSHO recorded something at a particular location.
   - Always stay with the CSHO, no matter where he/she is going.
   - Correct obvious deficiencies on the spot if possible. Make notation of what the deficiency was and what was done to correct it. If the CSHO instructs you to do something you don't feel is proper, ask him/her to put it in writing. Remember, OSHA citations are always conveyed in writing.

## CLOSING CONFERENCE

1. At the conclusion of the inspection, the CSHO will conduct a closing conference with the employer and employee representatives. The CSHO will describe the apparent violation(s) found during the inspection and indicate the applicable sections of OSHA Standards which may have been violated and what citations he/she plans to recommend. The Closing Conference doesn't always happen on the same day.
2. During the closing conference, the CSHO will give the employer the publication "Employer Rights and Responsibilities Following and OSHA Inspection". This publication explains the courses of action available to the employer if a citation is received.
3. The CSHO will discuss the strengths and weaknesses of the employer's safety and health program. The CSHO will also discuss the apparent violations and ask for input in order to establish abatement times. If you give a time estimate, you basically admit to an OSHA violation. **Don't be afraid to tell the CSHO that you don't agree with his/her assessment.**
4. The CSHO will advise the employer that they have a right to contest the violations and that this must be done in writing within 15 working days after receipt of the citation. As for methods of abatement.
5. Discuss or have the CSHO explain why it is a hazard on site so during later meetings, it will not appear the questions was made up.

## AFTER THE INSPECTION

Following completion of the inspection:

1. Notify the home office and or Safety director that the inspection has been completed and the results. Send home office a copy of any proposed citation sheets that have been furnished by the CSHO together with the notes, pictures, etc. taken during the inspection.
2. Review the alleged violations noted by the CSHO. Confer with the company Safety director, and other staff on how long it would take to correct the problems noted. This will give you a better idea of the time required in case OSHA specifies an unreasonable abatement period.
3. When the written copy of the citation is received, it must be posted at or near the place where alleged violation occurred. If this is not possible, the citation must be posted in a prominent place where all employees can readily observe it. The citation must remain posted for three (3) working days or until the violation is corrected, whichever is longer.
4. Decide if the citations will be contested.

**NEW EMPLOYEE ORIENTATION**
**CONFIRMATION OF TRAINING**

Hard hat issued on: _____
High visibility vest issued on: _____
Safety glasses: _____
Other: _____
Other: _____

I have received proper training in the Hazard Communications program. I have been given above noted equipment and have been trained in its use. I understand why it is necessary to use and maintain such equipment, and agree to its use.

_____ _____
Employee Signature Date

_____ _____
Trainer Signature Date