



Safety Policy

The requirements and policies described in this document are set forth in an effort to provide a safe and efficient environment for all individuals working at the project site. The term “Subcontractor” shall be defined as any entity, including employees or suppliers thereof, that provides labor, equipment or materials to or on behalf of William H. Lane Incorporated at the project site. Subcontractors in non-compliance with these requirements and policies, as determined by William H. Lane Incorporated, will be directed to leave the project site until the non-compliance issue(s) are rectified. All costs incurred by William H. Lane Incorporated and the respective subcontractor as a result of termination for non-compliance will be the sole responsibility of the subcontractor.

All tiers of Subcontractors shall comply with the requirements established in OSHA 29 CFR 1926, all applicable State and Federal Laws, local ordinances, rules, and regulations bearing on the safety of persons and property.

Each Subcontractor is responsible for the safety and health of their employees and the employees of all their tiers of Subcontractors.

A. Safety Programs

Each Subcontractor shall maintain at the project site a written Environmental, Safety, and Health Loss Prevention Plan that includes a written Hazard Communication/Employee Right-to-Know Program which conforms to the requirements addressed in 29 CFR 1926, on the jobsite. **Each Subcontractor’s Environmental, Safety, and Health Loss Prevention Plan shall be the governing document that all their tiers of Subcontractors shall comply with.**

B. Hazard Analysis

Prior to the start of any construction activity, a Hazard Analysis shall be completed by each Subcontractor and William H. Lane Incorporated will be advised in writing of any unusual site safety issues that may need to be addressed.

C. Record Keeping and Files

Each Subcontractor shall ensure that the following documentation is maintained and available for review at the site at all times:



- A written Safety and Health Loss Prevention Plan which includes a Hazard Communication/Employee Right-to-Know Program.
- Safety Data Sheets conforming to the Subcontractor's Hazard Communication Program.
- Jobsite safety meeting reports, including lesson plans which detail training.
- Accident investigations, including accident reports, witness statements, employee statement, any doctor correspondence, and pictures of the accident scene.
- Temporary Alternate Duty (TAD) job descriptions.

D. Accident Investigations

All injuries shall be reported to William H. Lane Incorporated immediately. Each Subcontractor shall complete and submit an Accident Investigation Report (see attached) for any injury, no matter how minor for their company's employees and the employees of their Subcontractors. **A WRITTEN ACCIDENT REPORT SHALL BE COMPLETED WITHIN 24 HOURS OF THE ACCIDENT.** The following information shall be included with the accident report:

- Injured employee's name and employer.
- Date, time and location of accident.
- Employee statement explaining accident.
- Witness statement explaining what they saw or their involvement.
- Pictures of the accident scene and description of the weather conditions at the time of the accident.
- All doctor information from initial medical evaluation.
- For any follow-up visits, the paperwork shall be forwarded immediately.
- Doctor **"Full Duty"** release. **NOTE: MANDATORY TO RETURN TO WORK AT THE SITE.**

All employees shall be taken to a medical provider for diagnosis of all injuries no matter how minor they are, unless an emergency exists. A doctor's **"return to work"** slip is required before that person goes back to work (TAD or "full-duty" work status). **Forecasting of "return-to-work" shall not be acceptable.**

Any Subcontractor who willfully delays the reporting of an accident as outlined in this section could be subject to termination of contract, work stoppage, delay in Pay Application, and/or other penalties.

- If an employee refuses medical attention, the following shall occur.
 - The employee shall provide a written signed statement as to why they are refusing medical attention.
 - The Subcontractor shall restrict access of the employee to the construction site until the employee has been seen by an approved medical doctor and released to "full-duty" or



TAD work status for the specific injury received while working on the construction site.

E. Incident “Near Miss” Investigation

Each Subcontractor shall investigate any incident resulting in a “near miss” which could have resulted in a serious injury or fatality. “Near misses” shall be reported to William H. Lane Incorporated in writing immediately.

F. Temporary Alternate Duty (TAD)

Each Subcontractor’s designated representatives shall accompany all injured employees to an approved medical treating facility to ensure that the injured employee receives appropriate treatment at the proper facility. The representative will make sure the treating physician is aware of the scope of alternate work (TAD), if any, available to the employee.

- Each Subcontractor shall attempt to make alternative work available on the construction project for injured employees who are permitted by the treating physician to return to work.

G. Safety Meetings (Tool Box Talks)

Each Subcontractor shall conduct weekly safety meetings on the jobsite. Attendees and minutes of the weekly safety meetings are to be documented. A copy of the training documentation shall be submitted to William H. Lane Incorporated weekly.

H. Competent Person Requirements

Each Subcontractor shall designate a competent person(s). The qualifications for competent persons are identified in the various Subparts of OSHA CFR 1926. NOTE: Certain subparts of OSHA have interpretations as to the qualifications and training required to be designated as a competent person (i.e.; Subpart P – Excavations; Subpart L – Scaffolding, etc.).

Prior to any work activity beginning in which OSHA requires a competent person, the Subcontractor shall identify their designated competent person(s) to William H. Lane Incorporated in writing.



I. Site Safety

- a) All Workers shall conduct themselves in a worker like manner at all times. Horseplay or disruptive activities of any kind shall result in immediate dismissal/removal from the jobsite.
- b) No use of tobacco products in finished areas.
- c) No eating or drinking (with the exception of water) is allowed in finished areas.
- d) All Workers shall be given safety orientation education and awareness training by their supervisors before they start work and must comply with the requirements as written in this document.
- e) Workers shall report unsafe conditions to their supervisors immediately. No worker shall be required or knowingly be permitted to work in an unsafe place, unless for the purpose of correcting the hazard and then only after all safety precautions have been implemented.
- f) It is each Subcontractor's responsibility when entering different project work areas to find out what safety precautions are required.
- g) Flag, barricade, or sign areas to keep Workers from exposures to potentially hazardous work conditions.
- h) Workers shall not remove or bypass any barriers or other protective devices from tools, equipment or hazardous locations. All deficiencies shall be reported immediately to WH Lane in writing.
- i) Clean up and housekeeping shall be top priority. This project shall be kept clean and orderly at all times. The work area SHALL be cleaned as directed by WH Lane.
- j) Glass containers of any kind shall not be brought onto the construction site.
- k) Mobilization and use of temporary office trailers/facilities shall be coordinated and approved by WH Lane.
- l) No one will be allowed to move a trailer or any other structure onto the property for the purpose of living on site.
- m) Permission shall be obtained from WH Lane prior to taking any vehicle into the building.
- n) Only company owned, and insured vehicles shall be allowed on the construction site.
- o) Subcontractors entering Confined Spaces must notify the WH Lane Site Representative in advance of the entry and provide the Representative with a copy of the Entry Permit – The Representative will not approve the permits.
- p) Any Subcontractors work which creates silica dust must follow the OSHA Standards to reduce or eliminate airborne silica dust. Precautions must be taken not to expose any worker on site to harmful levels of silica dust.



J. Personal Protective Equipment and Required Clothing:

Appropriate safety equipment and suitable clothing for construction shall be worn at all times on the construction site. **This is a 100% Hardhats, Safety Glasses, and Work Boots Site.**

- a. All Workers on site shall wear hard hats that meet the requirements of ANSI Z89
- b. All Workers on site shall wear safety glasses with side shields which meet ANSI Z87 - this includes prescription eye glasses with side shields.
 - i. ANYTIME equipment and tools which can produce flying chips, sparks, or debris (powdered actuated tools, electric or air-operated grinding tools, electric or air-operated impact tools, demo saws, chipping tools, etc.) are operated, eye and face protection shall be worn.
- c. Proper leather, hard soled work boots and. No Sneakers
- d. Shirts with sleeves (at least t-shirt length) and No Tank Tops
- e. Full-length pants shall be required. No Shorts,
- f. High Visibility Vests are required while working on the exterior of the building, and around traffic and mobile/heavy equipment.

K. Equipment and Material Handling Safety:

- a. Taglines shall be used on all suspended loads to stabilize the load. Workers shall not use their hands to stabilize the load. All taglines shall be of a continuous length, which are free of knots or other items.
- b. Seatbelts shall be worn at all times in vehicles including heavy equipment. All heavy equipment shall have rollover protection and seatbelts.
- c. Equipment stored overnight or longer will have all fuel supply valves shut off.
- d. No one shall ride in a vehicle or mobile equipment unless they are on a seat.
- e. Riding in the back of pick-ups shall not be allowed.
- f. Accessories to all mobile equipment (blades, bucket, stringer bits, etc.) when parked shall be lowered in the down position with ignition keys removed from switch.
- g. All heavy equipment including: cranes, forklifts, etc. shall have a reverse signal/back-up alarm audible above surrounding background noise.
- h. All lift equipment operators shall be experienced and qualified prior to operating any such equipment on the jobsite.
 - i. When lifting equipment or materials the following shall be adhered to:



1. The ENTIRE LIFTING RADIUS shall be flagged/barricaded, with only authorized personnel allowed in the flag area.
 2. The operator of lifting equipment shall know the weight of every suspended load, regardless of the size.
 3. Stable cribbing shall be used for all lifts.
- ii. All materials on the construction site shall be stored/staged on dunnage and located in approved areas as designated by WH Lane. All materials shall be properly stored and cribbed when brought onto the site. All materials shall be supported by bracing to prevent tipping/leaning or falling.

L. Excavations and Earthwork

- a. Excavation work shall be performed in accordance with 29 CFR 1926 Subpart P.
- b. Flagging and/or suitable warning devices will be required around all trench and excavation work at least three (3) feet (this distance can be exceeded if site specific requires) from the edge of the excavation.
- c. Spoil piles shall be put at least two (2) feet back from the edge of the excavation.
- d. A safe means of access and egress (ladder, ramp, stairway) shall be provided from excavations regardless of their depth at intervals that provide no more than 25 feet of lateral travel.
- e. All underground utilities shall be located prior to any excavation work occurring. The electrical Subcontractor shall be notified to assist with this location. As-built drawings and electronic location shall be used to locate all underground electrical utilities.

M. Fall Protection:

- a. The use of Fall Protection (Guardrails or Personal Fall Arrest Systems) shall be strictly enforced. This shall include:
 - i. OSHA approved PPE for fall protection.
 1. A full body harness that is approved by ANSI.
 2. All lanyards shall be shock absorbing and have double locking snap hooks that prevent rollout.
 3. A double lanyard shall be utilized anytime a worker must unhook and move to another location. One lanyard shall stay connected to the tie-off point before disconnection and moving.



4. All fall protection components shall be of the same manufacture type when used.
- b. Workers at heights shall not be allowed to work alone, and without means of rescue.
- c. Guardrails shall consist of a top rail, mid-rail and toe boards.

N. Boom and Scissor Lifts

- a. All Workers who operate equipment shall be educated in the safe operation of that equipment. Only trained and authorized Workers shall be allowed to operate that piece of equipment.
- b. All lifts shall be identified with the name of the Subcontractor utilizing same in a visible location.
- c. All aerial lifts shall be operated on a level-working surface. The working surface shall be capable of supporting the weight of the lift without the tires sinking into the surface.
- d. No tools or materials shall be suspended from the outside of the aerial lift basket.
- e. Material that is supported across the railings or the aerial lift, shall be secured in place to prevent it from falling to the ground or floor below.
- f. In the building, all lifts shall be propane or electronically powered. Gasoline or diesel-powered lifts shall not be used in the building. Any changes to this requirement is at the discretion of WH Lane.

O. Fire Protection and Prevention:

- a. Minimum size of 5 lb. (2A:10B:C) “ABC” fire extinguishers are allowed on the construction site, and minimum size for Hot Work is 10 lb. (4A:60B:C).
- b. **Hot Work Permits** are required to be completed for each day and each location where Hot Work will be performed. Hot Work Permits must be obtained from the WH Lane Representative.
- c. A Fire Watch shall be stationed to provide coverage for each welding, cutting, and other hot work operations.
- d. When not in use, all propane tanks, including empty tanks, shall be stored and secured in a safe manner outside the building.
- e. Only UL-approved metal fuel cans with flame arresters and self-closing pour spouts shall be allowed on sight.
- f. Fuel cans shall not be stored inside the building or inside trailers. Cans shall be brought inside the building only to fuel equipment and then removed immediately.



P. Ladders and Scaffolds:

- a. Ladders shall reach three feet above the landing for safe access.
- b. All ladders shall be positioned on a stable surface and secured to prevent displacement.
- c. Work shall be arranged so that the employee is able to face the ladder and maintain a “three points of contact” when climbing and working.
- d. Scaffolds will be erected and used under the supervision of a Competent Person; each Subcontractor utilizing a scaffold must designate a Competent Person for Scaffolds.
- e. Scaffolds must be inspected daily by each Subcontractor’s Competent Person, before their work on the scaffold begins.
- f. All scaffold shall be equipped with top and mid-rail and toe board.

Q. Electrical Safety:

- a. All frayed and/or damaged electrical cords shall be removed from service and repaired.
- b. Cords shall not be tied into knots.
- c. All electrical power tools and/or equipment shall be plugged into a ground fault circuit protection (GFCI) at the source of electrical power.
- d. Electrical panels shall not be accessed by anyone other than the electrical Subcontractor.
- e. Damaged or defective equipment shall not be used.
- f. The GFCI shall function properly - The GFCI when tested shall trip between 3mA and the 7mA settings on a multi-range GFCI tester.
- g. All portable generators including generator/welders used on the jobsite shall have a GFCI that is an integral part of the generator.
 - i. Any generator, in which the GFCI does not function, shall be tagged and removed from service immediately.
- h. Rubber boot protectors shall be provided on all welding leads where they make connections at the welding machine.