

Corporate Safety Manual

Jarbou Ronnisch Construction

The practice of occupational safety and health and its related regulatory programs are constantly under review and change. Additionally, there are significant differences in professional interpretation of regulatory standards and pertinent occupational safety and health information. In order to prevent costly work-related injuries and occupational illnesses with the resulting worker's compensation insurance claims, all employees must be properly trained and held accountable for safety. Employees must understand all known hazards presented in their work environment and be able to respond appropriately to unplanned hazards which may arise. The responsibility for complying with regulatory requirements and staying current with regulatory issues resides with the employer.

This publication is not intended to take the place of legal or professional assistance. If legal advice or other expert assistance is required regarding a specific issue confronting an employer, then the services of a competent professional should be sought accordingly. No representation can be made or responsibility taken by the publisher regarding the completeness, accuracy, or continued validity of the information in this publication.

This program does not address every item in 29 CFR 1926, nor is it intended to address motor carrier safety regulations, environmental safety regulations, or local codes and ordinances. The manual addresses several areas related to the prevention of workplace injuries and accidents faced by employers engaged in "general industry" operations. It is very important to understand that under Federal Law you are responsible for compliance with all standards and regulations of 29 CFR 1926, which apply to your work areas and operations.

JRC
CONSTRUCTION SAFETY MANUAL
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CORPORATE MANAGEMENT POLICY STATEMENT

1.0 CORPORATE MANAGEMENT POLICY STATEMENT

The personal safety and health of each employee of our organization is of primary importance. We believe that our employees are our most important assets and that their safety at the worksite is our greatest responsibility. The prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity whenever necessary. Management will provide all mechanical and physical facilities required for the personal safety and health of each of its employees.

To be successful, such a program must embody the proper attitude toward injury and illness prevention on the part of corporate management, supervisors, and employees. It also requires cooperation in all safety and health matters, not only between corporate management, supervisor and employees, but also between each employee and their fellow workers.

Our concern for safety and health of all human beings is daily, even hourly. We expect every person who conducts the affairs of our company, no matter in what capacity they function, to accept this concern and its responsibility. Employees are expected to use the safety equipment provided. Rules of conduct and rules of safety and health must be observed. Safety equipment cannot be abused or destroyed.

Cooperation between our employees and management in the observance of this policy will ensure safe-working conditions, will help result in accident-free performance and will work to our mutual advantage. It will also assist in reducing workers' compensation costs (direct costs) and reduce jobsite downtime, material loss and regulatory agency fines (indirect costs).

Management has the authority to procure the necessary resources to execute the objectives of our company's safety and health program. We will hold managers, supervisors and employees accountable to meet their responsibilities so that essential tasks will be performed.

Frank Jarbou
Jarbou Ronnisch Construction

1.1 CORPORATE MANAGEMENT SAFETY RESPONSIBILITIES

1. Eliminate potential hazards by providing appropriate safeguards, personal protective equipment and safe work tasks.
2. Provide and/or enforce the use of necessary personal protective equipment and its proper use and care.
3. Provide effective training, which is required by the "standards", as a minimum for the employees.
4. Become familiar and comply with applicable OSHA/ MIOSHA standards (29 CFR 1926, Construction) and make copies of medical records as well as all safety and health programs available for employees to review.
5. Review, consider for approval, and execute appropriate action on safety policies developed by safety committees or safety director.
6. Ensure a high level of productivity and safety performance and hold project management staff accountable.

1.2 SAFETY DIRECTOR RESPONSIBILITIES

1. Monitor supervisory management and employee activity to ensure that the corporate programs are carried out in a timely manner.
2. Shall coordinate safety information between projects to assure that all projects will benefit from each other's efforts.
3. Coordinate all safety activities including jobsite inspections, and distribution of safety materials. Perform jobsite inspections periodically and follow up corrective actions.
4. Maintain all accident records and complete all required OSHA forms.
5. Analyze accident records and show trends.
6. Promote safety education on all levels.
7. Periodically review safety rules and standards with employees to confirm that the company is meeting its goals and objectives.
8. Review with supervisors how to handle emergency procedures at each jobsite location.
9. Confirm that all required signs are posted, and bulletin boards are maintained in clear and legible condition.
10. Confirm employer is enforcing compliance with all applicable federal, state, and local regulations.
11. Provide a regular report to upper management on the results of the safety program.
12. Conduct job site safety reviews
13. Schedule and attend MIOSHA CET Inspections

1.3 SUPERINTENDENT RESPONSIBILITIES

1. Know safety rules and work practices that apply to the work you supervise. Take action to confirm that all employees, including subcontractors, in your charge, understand the safety rules that apply to them. Always take immediate action to correct safety rule violations. Unsafe acts or procedures cannot be tolerated.
2. Prevent bad work habits from developing. You are responsible for making daily observations of employees to ensure that they perform their work safely and continue this observation regularly once safe working habits are established.
3. Take action to correct or control hazardous conditions within your work areas. If it is beyond your control, remove the employee until the condition is safe. Eliminate unsafe conditions and prevent accidents.
4. Encourage workers to report on unsafe conditions or procedures. Listen to your workers and don't take their safety complaints lightly. No job should proceed when a question of safety remains unanswered. Seek advice from your project manager when necessary.
5. **Set a good example.** Demonstrate safety in your own work habits and personal conduct. Always wear personal protective equipment in areas where personal protective equipment is required.
6. Train your employees in the proper safety procedures to follow, including the use of additional safeguards such as machine guards and personal protective equipment.
7. Investigate and analyze every accident, however slight, that occurs to any of your employees. Control the causes of minor incidents to help avoid future crippling accidents.
8. Complete and file a report on each and every incident and accident that occurs at your job site. If you have question or require reporting forms, contact your project manager.
9. Conduct weekly Subcontractor coordination meetings including Safety topics. Require toolbox talks to be performed by subcontractors.
10. Make safety suggestions.
11. Serve on safety committee, if requested.
12. Take an active part and participate in safety meetings.
13. Non-compliance of these rules as well as other federal and/or state laws or regulations **may be legal violations subject to civil and/or criminal penalties.**

1.4 **EMPLOYEE RESPONSIBILITIES**

1. Whenever you are involved in an accident that results in personal injury or property damage, no matter how slight, the accident must be reported to your supervisor or other management personnel prior to the end of the work shift. Get first aid promptly.
2. Report on any condition or practice you think might cause injury and/or damage to equipment immediately to your supervisor.
3. Do not operate any equipment, which, in your opinion, is not in a safe condition. Report immediately the condition that you believe is unsafe to your foreman.
4. All prescribed safety equipment and personal protective equipment must be used when required and must be maintained in good working conditions. It is your personal responsibility to use such equipment. The use of required personal protective equipment is a non-negotiable item.
5. Obey all safety rules, government regulations, signs, markings, and instructions. Be particularly familiar with the rules and regulations that apply directly to you in the area in which you work. If you don't know, ask your foreman.
6. When lifting, use the approved lifting technique, i.e. bend your knees, grasp load firmly, keep load close to you, and then raise the load keeping your back as straight as possible. Always get help with heavy or awkward loads.
7. Do not engage in horseplay; avoid distracting others; be courteous to fellow workers.
8. Always use the right tools and equipment for the job. Use them safely and only when authorized. If you are not familiar with the safe way to use a particular tool or piece of equipment, ask your supervisor. When using your own tools on the job site, make sure all guards, ground pins, etc., are in place.
9. Good housekeeping must always be practiced. Return all tools, equipment, materials, etc., to their proper places when you are finished with them. Keep floors clean and passageways clear. Poor housekeeping wastes time, energy, and material, and often results in injury.
10. The use of drugs and/or intoxicating beverages on the jobsite is forbidden. Being under the influence of alcohol or drugs when on the jobsite is inexcusable. *Immediate discharge for being under the influence and/or using drugs or alcohol may be instituted.*

11. Additional appropriate disciplinary action will be taken for the following offenses:
 - a. Fighting - no matter what the cause.
 - b. Insubordinate conduct or refusal to follow directions.
 - c. False statement, such as injury claims.
 - d. Other inappropriate behavior including, but not limited to, failure to obey safety rules.
12. Loose clothing and jewelry cannot be worn when operating machinery and equipment.
13. Proper work shoes shall be worn at all jobsites. Open-toed shoes and sneakers will not be permitted to be worn at any job site. If you are observed wearing open-toed shoes or sneakers, you will not be permitted to work until you return with proper footwear.
14. Do not handle chemicals unless you have been trained in the safe handling procedure.
15. **Hardhats shall be worn at all times. High visibility vests shall be worn when site has active heavy equipment in motion.**
16. Read, understand and follow the guidelines set forth in the material safety data sheets (MSDS) pertaining to your work.
17. Compliance with safety and health rules and regulations is a condition of employment.

1.5 COVID-19 EXPOSURE PREVENTION/PREPAREDNESS & RESPONSE PLAN

Pursuant to changes in COVID-19 and its related variants, JRC has suspended all pandemic related procedures in conjunction with the CDC guidelines. We recommend all employees refer to the attached link for further information.

Current CDC Recommendations:

https://www.cdc.gov/coronavirus/2019-ncov/your-health/treatments-for-severe-illness.html?s_cid=11799:covid%20treatment%20guidelines:sem.ga:p:RG:GM:gen:TTTC:FY23

I have read the above policies and understand that cooperation between employees and management will ensure safe-working conditions, will help result in injury free performance and will work to our mutual advantage.

Corporate Management

as of: _____ by: _____

Safety Director

as of: _____ by: _____

Superintendent

as of: _____ by: _____

Employee

as of: _____ by: _____

2.0 DISCIPLINARY POLICY PROCEDURES

All employees are expected to comply with jobsite rules and regulations, and to follow established operating procedures set forth by this company. Violations will not be tolerated, and superintendent will be held accountable for the conduct of their employees.

Superintendents are required to take action when a violation is observed. Immediate action to control or eliminate a hazard is required. If an offense is willful and would result in personal bodily harm to any employee, notice may be accelerated beyond the first two warnings. Further review of action may be required.

In the event a violation is observed, the following procedures have been established to place an employee on notice.

<u>Notice*</u>	<u>Action</u>
First Offense	A written warning addressed to the employee and a copy placed in the Subcontractor's file referencing the violation and warning, including date and time.
Second Offense	A written warning addressed to the employee with reference to the violation including date and time of the occurrence. A copy of this warning will be given to the employee, and another copy will be placed in the employee's file.
Third Offense	A written warning similar to the second notice will be prepared and distributed in the same manner. This warning will be followed by a meeting with the employee, foreman and/or project manager and senior management to determine whether the employee will be suspended without pay or terminated depending upon the nature of the violation.
Fourth Offense	Termination.

* Within any consecutive 12-month period.

* This policy is in effect unless there is a policy in our labor/management agreement.

The above procedure has been prepared so that there is no question about how violations of rules, regulations, and procedures will be handled by management and so that employees will know what to expect if they do not comply with the established rules, regulations, and procedures. Management knowledge of unsafe behavior and lack of appropriate documented discipline may be a violation of federal, state laws and regulations.

2.1

Employee Disciplinary Action Form

Project: _____ Shop: _____

Employee Name: _____ Date: _____

Superintendent: _____ Day: _____

Foreman: _____ Time: _____

1st Violation

Description:

Employee Signature: _____

2nd Violation

Description:

Employee Signature: _____

3rd Violation

Description:

Employee Signature: _____

4th Violation: TERMINATION!

WITHIN A 12 MONTH PERIOD

3.0. NEW EMPLOYEE/ SUBCONTRACTOR TRAINING

All new employees/subcontractors will be trained by a member of the management staff prior to starting work on each project. The "New Employee/Subcontractor Safety Orientation Checklist" shall be used by trainers (managers, superintendents, foremen, safety directors) as a reminder of the items that must be reviewed with the employee. All items must be initialed or identified as not applicable. The checklist must be signed by the employee and the management representative after the orientation is completed.

This form will be given to the project manager or home office and kept in the employee's personnel file.

3.1 New Employee Safety Orientation Checklist

Instructions to Management: Initial each item as you discuss it with the employees. This checklist must be completed before the employee starts work.

<u>Item</u>	<u>Completed</u>
1. Employee received Company Safety Program	_____
2. Review:	
·Safety and Health Policy	_____
·Employee General Safety and Health Rules	_____
·Disciplinary Policy and Procedures	_____
3. Instruct:	
·How to report unsafe conditions	_____
·What to do in the event of an injury on the job	_____
·Hardhats, work boots, safety glasses/goggles mandatory (Personal protective equipment is not negotiable)	_____
·Explain Fire Evacuation/Emergency Plan	_____
· Proper lifting techniques and importance of back fitness	_____
· Review OSHA Hazard Communication Policy and provide training	_____
4. Other (Please List)	
____JRC Cheat Sheet	
JRC Trailer Set up list	
JRC Site Signage order form	
Subcontractor Pre-task plan	
Subcontractor Safety Orientation	
Hot Work Permit	
Confined Space Permit	
Restricted Access Zone_____	

Date

Date

4.0 COMPETENT PERSON DESIGNATION

It is the responsibility of each subcontractor to appoint an individual as a competent person who can identify existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

There is the possibility that more than one competent person may be necessary, depending on the range of hazards on the project, the size of the project, and the distance between operations on a project.

5.0 SAFETY COMMITTEE

The development and implementation of a safety committee is an excellent technique in the monitoring of your safety program. It will create accountability throughout the organization.

Membership: It is most appropriate to appoint members from top management, the personnel director, one or more project managers and superintendents.

Meetings/Minutes: The safety committee should meet on a pre-scheduled monthly basis, at a regular time and place. Minutes from these meetings should be kept on file for review by management and insurance representatives. The agenda for the safety committee meetings will include items that relate to the safety and health of your employees. Safety committee minutes will be distributed to company management, job site management and safety staff.

Committee Goals: Our committee is expected to provide solutions to worksite safety and health problems. To do so, the committee must be aware of problems, serve as a channel of information from employees to management, and make positive recommendations for corrective action.

5.1 Safety Committee Meeting Agenda

Topics for discussion and action at safety meetings will include:

1. Review accident investigation reports and determine if appropriate corrective action was taken to prevent similar occurrences in the future. If not, recommendations will be submitted to management for their consideration and subsequent action.
2. Prepare and review company safety and health rules and procedures for the purpose of keeping the safety and health program up to date and effective.
3. Review potential hazards that are/ have been reported and recommend to management ways and means to control or eliminate hazards that could lead to accidents or property damage.
4. Promote safety and health activities.
5. Review the need for employee training and education and make recommendations to management.
6. Make periodic over-sight jobsite inspections to ensure that hazards are not being overlooked by the superintendent or foreman, and to ensure that corrective action is adequate and taken in a timely manner.
7. Review accident statistics for the purpose of identifying high accident jobsites, problem foremen, trends, etc. Based on findings, make recommendations to management.
8. Develop & maintain a Lessons Learned Database to be shared and accessible to all employees.

5.2 Safety Committee Minutes

Members Present: _____

Meeting Date: _____

Minutes Prepared by: _____

Members Excused: _____

Next Mtg. Date: _____

Members Absent: _____

Location: _____

<u>Topic</u>	<u>Summary of Discussion</u>	<u>Action Required/ Assigned To:</u>	<u>Due Date</u>
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6.0 ACCIDENT INVESTIGATION

The Superintendent shall notify the JRC Safety Director of every accident/near miss occurrence. Communication from there will be distributed to JRC Senior management. Each superintendent will make a documented report of every incident, even those without injury, within twenty-four (24) hours of the occurrence. Reports are to be completed as soon as possible to avoid changes in physical conditions and witness reports. Note: any accident that causes a fatality or three or more employees to be hospitalized must be reported to OSHA within eight hours of the incident.

Accident reports highlight problem areas. Through the use of good reports, accident patterns can be detected and resources directed toward prevention. Accident reports make excellent training tools. The causes and effects of accidents can be reviewed at safety meetings.

Superintendents will be trained in accident investigation techniques.

- Accident investigation is a management function that must be executed at the superintendent level.
- All accidents/incidents must be investigated regardless of the extent of the injury or damage.
- Employees will never be allowed to fill out their own accident investigation report.
- Focus must be fact finding *not* fault finding.
- Superintendents must identify the unsafe act or unsafe condition.
- Superintendents should provide recommendations for *corrective action*, bring it to top management's attention and ensure that it is acted upon.

The forms at the end of this document will assist with incident investigations.

7.0 RECORDKEEPING

Records must be maintained and kept up to date by the superintendent at each job site and/or home office. If there is no superintendent, then this responsibility lies with the foreman. These records must always be available for review. The following records must be maintained.

1. Supervisor's Investigation and Record of Incident
2. OSHA LOG (form 300) <http://www.osha.gov/recordkeeping/RKforms.html>
3. Self Inspections
4. Directions to the nearest health care provider
5. Equipment Preventive Maintenance
6. Hazard Communication Compliance Plan
7. Material Safety Data Sheets
8. Chemical Inventory List
9. Minutes of Safety Committee Meetings
10. OSHA Training Requirements Records
11. OSHA Poster Explaining Employee Rights
<http://www.osha.gov/Publications/poster.html>
12. Accident Forms
13. Corporate Safety Program
14. Emergency Phone Number List
15. Emergency evacuation/rendezvous plan

8. SUBCONTRACTOR COMPLIANCE

OSHA has clarified their position with respect to multi-employer work sites by identifying four different types of employers.

Exposing employers - those whose employees are exposed to hazards.

Creating employers - those who actually create hazards

Controlling employers - those who have the authority to ensure that hazards are Corrected.

Correcting employers - those who are specifically responsible for correcting hazards

In order to issue a citation for a worksite hazard to one of these types of employers, OSHA must prove that the employer had knowledge of the hazardous condition or could have had such knowledge with the exercise of reasonable diligence.

As always, prevention is the first step in avoiding MIOSHA sanctions. It is imperative that **Jarbou Ronnisch Construction** understand the rules and potential liabilities related to OSHA's multi-employer worksite clause. We require subcontractors to comply with OSHA standards.

Contractual agreements with subcontractors will state that they must provide the following:

1. Certificate of Insurance
2. Hazard Communication Plan
 - Chemical Inventory List
 - Specific material safety data sheets
3. Safety Program

The following forms will assist in monitoring subcontractor compliance with safety policies and procedures.

8.1 Sample Letter to Subcontractors

Re: Jobsite Safety

Gentlemen/Ladies:

The personal safety and health of each employee and worker on our projects is of primary importance. The prevention of occupationally induced injuries and illnesses is of such consequence that it should be given precedence over operating productivity whenever possible. To the greatest degree possible, Company Management should provide all mechanical and physical facilities required for personal safety and health.

Therefore, if your Company does not comply with our Field Management concerning safety, the following will occur:

First Violation: Written Notice

Second Violation: We will withhold your monthly payments until infraction is corrected.

Third Violation: Your Company will jeopardize possible future subcontracts with our Company.

If you have any questions and/or comments please contact the undersigned.

Very truly yours,

9.0 TOOL BOX MEETINGS

Toolbox talks of 5 to 10 minutes must be held by Subcontractors **each week**. Employees never receive too much training, and therefore our company relies upon job-site management to provide ongoing and continuous employee training.

The subject of each training talk should be chosen to relate to the type of work that is being performed.

Some examples include:

- The use of safety glasses when using circular saws, grinders, table saws, radial arm saws, jack hammers, power actuated tools, etc.
- The proper set up and use of ladders.
- Hard hats and why they are necessary.
- A discussion of a recent accident and its cause(s).
- A discussion of an old accident.
- A discussion of disciplinary procedures for failure to comply with safety policies

Although JRC does not require a copy of the performed toolbox talk, the responsible subcontractors must be able to provide employee signed documentation that the training topic was covered, if requested.

10. FIRST AID - BLOODBORNE PATHOGENS

The following are highlights of a Bloodborne Pathogens Program. Please refer to Corporate Safety & Health Consultants' *Bloodborne Pathogens Manual* for details on implementing a complete program.

Our company will provide first aid supplies at each work location, and all personnel are to know procedures to follow in case of an emergency.

1. Report all injuries immediately, no matter how minor, to your foreman and/or jobsite office.
2. Emergency phone numbers for fire, police and ambulance will be posted.
3. Please note that if any employee renders first aid or uses a first aid kit to assist a co-worker (although such action is not required by anyone's duties) we would view this activity as a "Good Samaritan" act. Note: First aid kits are to be approved by a licensed medical doctor.
4. If there is a potential for death or serious physical harm (i.e.: stoppage of breathing and/or severe bleeding) and appropriate medical attention is not available within 3-4 minutes, then an employer is required to have a trained first aider on each shift.

The attached draft policy statement is to be used by those who do not expect an employee to assist co-workers and who meet the 3–4-minute medical response requirement.

10.1 Assisting Co-Workers in Medical Emergencies

To: All Employees

From:

Subject: Assisting Co-Workers in Medical Emergencies

The policy of this organization is that we do not expect, as part of any employee's duties, to assist a co-worker in a medical emergency. Since appropriate medical assistance is available within a reasonable time by calling the phone number posted at the jobsite, employees are not required to assist co-workers.

The use of the First Aid Kits that may be available within our organization are for self-help. That is, an employee who is injured may use the materials in the first aid kit for self-administration.

Please note that if an employee uses a first aid kit to assist a co-worker (although such action is not required by anyone's duties) we would view this activity as a "Good Samaritan" act.

11. **SUPERINTENDENT SELF-INSPECTION**

It is our policy to reduce and eliminate hazard exposures that can lead to employee injury or property damage. Self-inspection is one way to provide a safe workplace for our employees.

Superintendents are required to make daily visual inspections of their work areas. Corrective action must be provided immediately if any hazards exist rear if any safety devices are not functioning properly. If the equipment cannot be repaired before being used so that it is safe to use, then it must be removed from service.

Superintendents (or other assigned management representatives) are required to complete a Bi-monthly inspection of the work site using the forms furnished by our company. All work areas including office areas, will be inspected using this form. If any hazardous conditions are noted, corrective action must be taken. If the corrective action is beyond our authority and/or capability, keep all employees away from the hazardous condition until it is corrected or controlled. Notify the project manager in writing to request corrective action. Superintendents are expected to follow up on reported hazards to make sure they have been eliminated or controlled.

All completed forms, signed and dated by the superintendent where indicated must be filed in the respective job folder on JRC's server.

Lack of appropriate inspections as well as falsification of inspection forms is a violation of company procedure and may be a civil and/or criminal violation of federal and/or state laws and/or regulations.

12. **PROJECT SITE SPECIFIC SAFETY PROGRAM**

The owner, construction manager or general contractor will conduct a pre-bid meeting to discuss and explain the project site safety program. This program should include at minimum the following:

A. **Purpose Of The Plan**

The purpose of this Construction Safety and Health Plan is to establish practices and procedures to protect construction personnel and others during construction on the site.

B. **Applicability**

The provisions of the plan are mandatory for contractors and subcontractors engaged in any on-site construction activities.

C. **Site Description**

1. Proposed Project
2. Site Description and History
3. Risk Evaluation

D. **Emergency Information**

1. Emergency Contacts
 - Police
 - Fire
 - Ambulance

E. **Site Safety Work Plan**

1. Designation of Site Safety Coordinator (**Superintendent**)
2. Recordkeeping Responsibilities
3. First Aid/Bloodborne Pathogens
4. Excavation/Trenching
5. Demolition
6. Responsibility for Fall Protection
 - Guard Rails (top rail, mid rail, toe boards)
 - Scaffolds
 - Ladders
 - Safety Nets

7. Responsibility for Lead Determination and Abatement
8. Personal Protective Equipment
 - Hard Hats
 - Gloves
 - Safety Glasses/Goggles
 - Work Boots
 - Safety Belts and Lanyards
9. Fire Protection and Prevention
 - Fire Extinguishers
 - Storage and Use of Flammable and Combustible Liquids
10. Material Handling, Storage Use and Disposal
11. Tools - Hand Power
12. Welding and Cutting
 - Storage and Use of Oxygen and Acetylene Tanks
13. Electrical
 - Ground Fault Circuit Interrupters
14. Heavy Equipment/Forklifts
 - Crane Management Plan
15. Respiratory Protection Program
16. COVID-19 Prevention Plan

13. DRUG AND ALCOHOL PROGRAM

Jarbou Ronnisch Construction LLC (“JRC”) is committed to providing a safe and productive work environment for its employees and others having business with JRC. This policy is aimed at ensuring a safe work environment and outline specific responsibilities, requirements, and expectations to adequately mitigate the workplace risks associated with drugs and alcohol. Notwithstanding anything to the contrary herein, as this Policy relates to subcontractors, this Policy is subordinate to any union agreements.

The unlawful use, possession, purchase, sale, distribution, or being under the influence of any illegal drug and/or the misuse of legal drugs (including prescribed use in a manner that creates a health or safety risk) while on company or client premises or while performing services for JRC is strictly prohibited. JRC also prohibits reporting to work or performing services while impaired by the use of alcohol.

Drug and alcohol abuse testing may be conducted in the following situations:

- **Pre-employment testing:** As required by JRC for prospective employees who receive a conditional offer of employment.
- **Project or position assignment testing:** Pre-assignment testing as required by clients for specific projects or for any safety-sensitive positions.
- **For-cause testing:** Upon reasonable suspicion that the employee is under the influence of alcohol or drugs that could affect or has adversely affected the employees job performance or after a workplace accident causing property damage or injury.
- **Random testing:** As required by federal or state law, as required by clients for specific projects, or for any safety-sensitive positions.

Jarbou Ronnisch Construction reserves the right to request a drug test be completed at any time during your employment. Refusal to be tested for drugs or alcohol will be treated the same as a positive test result. JRC will pay for the cost of the testing of JRC employees. Subcontractors will pay for the cost of the testing of their own employees.

Drug testing shall be performed using a certified collector to collect the urine specimen then sent to a certified laboratory for analysis. The testing lab will retain samples in accordance with State law, so that an employee and/or subcontractor may request a retest of the sample at his/her own expense if the individual disagrees with the test result.

Drugs Being Screened For

- Amphetamines, Barbiturates, Benzodiazepines, Opiates, Cannabinoids, Cocaine, Methadone, Methaqualone, Phencyclidine (PCP), Propoxyphene, and chemical derivatives of these substances.

Right to Review Records. Employees and subcontractors have a right to obtain copies of all test results from the testing laboratory. When the individual disagrees with the test results, the individual may request that the testing laboratory repeat the test. Such repeat tests shall be at the expense of the individual.

Violation of this policy will result in suspension from jobsite and disciplinary action up to and potentially including immediate termination.

Confidentiality will be maintained to the greatest extent possible, and disclosure will be restricted to where it is necessary for related health and safety concerns. Only information relating to the level of functionality may be shared with supervisors and for the sole purpose of appropriate work accommodation, and/or work re-entry initiatives.

To the extent that any federal, state, or local law or regulation limits or prohibits the application of any provision of this policy, that particular provision will be ineffective in that jurisdiction only, while the remainder of the policy remains in effect.

JRC reserves the right to modify, amend, or discontinue this policy and procedure at anytime as deemed necessary.

14. INCIDENT INVESTIGATION FORMS

14.1 Subcontractor Safety Orientation Checklist

14.2 Incident/ Accident Report

15. **HAZARD SPECIFIC POLICIES**

To further ensure the safety of our employees and ensure compliance with specific requirements that may be mandated under local, state or federal regulations, **Jarbou Ronnisch Construction** has attached the following MIOSHA's Construction Safety and Health Standards link for your quick access. This is designed to address specific hazards in the workplace. These plans will be updated periodically as indicated by law and whenever there is a standard revision.

https://www.michigan.gov/leo/0,5863,7-336-94422_11407_15368-39938--,00.html

17.0 MOBILE CRANE SAFETY PROGRAM

Jarbou Ronnisch Construction (JRC) is dedicated to providing employees and others a safe working environment on projects in which we are involved. The practice of diligence, good judgment and common sense by all project team members helps to create an environment in which the occurrence of accidents is substantially reduced. JRC has established this Crane Action Plan to promote crane safety, document crane inspections, coordinate all aspects of the crane set-up and use, verify operator training, and to verify the weight of the loads being lifted does not exceed the capacity of crane. Any subcontractor performing work, which requires installation, set-up and/or use of any cranes, must be performed in accordance with this plan. By contract, all of JRC's subcontractors and suppliers are obligated to comply with the contents of this Crane Action Plan.

This Crane Action Plan has been formulated to govern the activities of all personnel involved with crane set-up and use on this project. The goal of this plan is to eliminate costly crane mishaps from occurring by planning for each crane lift.

Purpose:

To establish and implement a comprehensive crane safety program for the protection of personnel and property.

Objectives:

- To eliminate all crane failures and mishaps.
- To identify that the crane will be operated by a Certified Crane Operator (CCO).
- To pre-plan various aspects of the crane lift.
- Document crane inspections.
- Verify that load weights to be lifted will not exceed the crane's capacity and line configuration.

Definitions:

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

Qualified Person: One who, by possession of a recognized degree, certificate, professional standing, or who by extensive knowledge, training and experience, successfully demonstrated the ability to solve/resolve problems relating to the subject matter, the work, or the project.

Scope:

This plan applies to all work on any JRC project where a crane (including overhead and gantry cranes) is put in use. In addition to this plan, the manufacturers' recommendations will be reviewed prior to installation/setup and use of crane. Furthermore, the manufacturers' recommendations and requirements for the crane being used must be complied with.

Procedure:

General Requirements

1. All manufacturers' procedures and prohibitions shall be followed when assembling and disassembling cranes and/or equipment.
 2. The assembly/disassembly shall be directed by the subcontractor's designated competent and qualified person (A.K.A: Lift Director). A Pre-Task and/or assembly plan shall be developed prior to beginning the work.
 3. The work zone of the crane shall be identified (360 degrees around the crane up to the maximum working radius) along with any power lines that may be within 20' of the crane or loads. If it's determined that any part of the crane, load line, or load could get closer than 20' to a power line, at least one of the following measures shall be taken:
 - a. Ensure power lines have been de-energized and visibly grounded.
 - b. Ensure no part of the crane, load line, or load get closer than 20'.
 - c. Determine the line's voltage and minimum approach distance permitted in the table below.
- Note: If using B., or C., additional measures must be in place.
4. All equipped crane safety devices should be in working order before the work operation begins. If a device is to be found defective, NO WORK shall begin until serviced and repaired.
 5. The crane operator has the authority to stop and refuse to handle or lift any load if an unsafe situation or condition exists during the work operation. Lifting will resume only when approved by the work operations qualified person (A.K.A: Lift Director).
 6. A designated signal person (other than those directly receiving the work) shall be provided when:
 - a. The point of operation is not in full view of the operator
 - b. The view is obstructed when the crane is traveling
 - c. The operator or the person handling the load determines it's necessary due to project specific concerns.

7. The swing radius of the crane shall be marked and identified to prevent accidental pinch/crush incidents to employees.

8. A CO2 or dry chemical fire extinguisher shall be kept in the crane cab or crane vicinity.

17.1 Documentation of Crane Inspection

1. Annual inspections must be completed by a qualified person, with documentation submitted to JRC before use of crane. The current annual inspection must be maintained for 12 months in its entirety with the crane.
2. Monthly inspections conducted by a qualified person (only requires competent person, normally the crane operator) must be completed with the current monthly inspection documentation submitted to JRC prior to the use of the crane. Subsequent monthly inspection, conducted by a competent person, must be submitted to JRC for the duration of time the crane is on the project. In addition, the previous 3 months of inspection reports must be maintained with the crane at all times.
3. Initial (Assembly or Mobilization) Inspections must be completed with documentation submitted to JRC.
4. Daily (called Shift inspections, 2 per day if running 2 shifts per day) inspections must be completed by a competent person with documentation submitted to JRC at the end of each week. Any Non-Compliance found during the Daily Inspection MUST be corrected and reported to JRC before operating the crane. Contractors may use their own forms provided they meet or exceed the manufacturer's inspection guidelines.
5. Whenever the crane is modified/repaired/or adjusted while on the project an additional inspection
conducted by a Qualified Person must be conducted with documentation submitted prior to crane being put back into use. Any modifications require the crane manufacturer to provide written approval.

Crane Operator Certification

1. The Contractor must employ a Certified Crane Operator (CCO) who possesses a valid certification from one of the following accredited training centers:
 - National Commission for the Certification of Crane Operators (NCCCO)
 - Operating Engineers Certification Program (OECF)
 - National Center for Construction Education and Research Crane Operator Certification (NCCER)

The crane operators employer verification documentation should also be collected prior to any lift.

2. The Operators Certification designation must match the crane type that is being used to perform the lift.

Pre-Lift Meeting

1. All Contractors, subcontractors, and Crane Rental Companies involved with any lifting operation must attend this meeting.

2. The meeting will address the Safety Policies and Procedures, Pre-Task Analysis, Safety Expectations for the project, review of the manufacturer's recommendations, and how the weight of the load is verified. Crane documentation will be reviewed and discussed at this time.
3. The Operator(s) must be present at the meeting to provide input and understand the safety criteria for the Project. The Operator's CCO card will be reviewed at this time.
4. Subcontractor and Crane Operator must prepare a Pre-lift Plan and Pre-Task Analysis prior to the crane being put in use. The Pre-Task Analysis (PTA) will be reviewed, communicated, and signed off by all parties involved with the lift. A Copy of the PTA will be given to JRC for review.
5. All manufacturer procedures applicable to the operational functions of the crane, including any attachments (i.e. jib) shall be complied with.
6. The operator shall have access to the procedures applicable to the work operation of the crane. This will include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions, and the operator's manual.
7. The Safety Disciplinary Action Plan will be discussed. The Disciplinary Actions for a Crane related incident involving Personal Injury, Property Damage, or a "Near Miss" will Include:
 - The Operator will be removed from the Project if the incident was a result of Operator Error as determined by the accident investigation.
 - The Subcontractor and/or the Crane Rental Companies must remove the Crane from the Project for 90 days. The JRC Executive may waive this restriction. The Crane must undergo a new annual inspection by a qualified person before it can be placed back into service.
 - The Subcontractor and/or the Crane Rental Companies must complete an Action Plan to prevent reoccurrence. This Action Plan will be reviewed by JRC Corporate Safety Director.

Load Verification

- All subcontractors and operators must be able to provide confirmable documentation that the load being lifted will not exceed the crane's rated capacity for the configuration in use.
- Safety devices and operational aids such as Load Moment Indicators (LMI's) are never to be manually overridden for any reason while making lifts.
- All Cranes must be equipped with the manufacturer's Load Chart. This can be verified via comparing serial numbers from the crane to the load chart.
- The Operator or Lift Director, during the pre-lift meeting, shall provide load chart calculations for the loads being lifted based on crane configuration.

- The manufacturer shall approve all modifications to the crane that may affect the capacity or safe working operation of the equipment. The approval shall be written to be recognized.

Note: Crane mishaps that are the result of failing to verify the load weight being lifted does not exceed the crane's rated capacity will result in disciplinary action, which may include permanent removal from all JRC projects.

17.2 Critical Lifts

A critical lift is any lift that exceeds 75% percent of the crane's capacity at the working radius, requires the use of more than one crane, a dollar value greater than \$50,000, a load weight of 25 tons or greater, or involves special hoisting equipment (such as hoisting personnel, pick and carry) . A critical lift requires extra emphasis on planning due to the small margin of error and serious consequences of any mistake. JRC Corporate Safety Director must be made aware of any critical lifts taking place and a copy of the PTA must be provided for review by the corporate safety department prior to the lift.

Critical Lift Considerations

- Pre-Lift meeting with written Pre-Lift Plan and Pre-Task Analysis is mandatory for all critical lifts.
- The Ground must be compacted and stable (should be done for all lifts).
- Determine the soil-bearing capacity and document it (should be done for all lifts).
- Determine overhead conditions such as power lines (should be done for all lifts).
- Determine in advance the weather conditions that will cancel the lift (e.g. wind speed, visibility, rain, lightning)
- What wind speed can the crane lift at and do it safely. (Refer to owner's manual)
- Determine the exact weight of the load (this is extremely important)
- Determine weights of rigging, hoist line, and crane hook.
- Make sure the crane is level within manufacturer's specifications before lifting.
- Designate a qualified signal person. Proof of training must be submitted to JRC.
- Designate one person (A.K.A: Lift Director) who has the ultimate authority to make the "go/no go" decision of the lift.
- Stick to the lift plan and Pre-Task Analysis.
- All rigging shall be inspected prior to each use.

Crane Support Requirements

In order for the crane to support the load, the ground must be compacted, stable, and capable of supporting the loaded crane. The ground bearing pressure generated by outriggers is very high. On certain lifts, much of the total weight of the crane and load can be transmitted to one outrigger. Since the area of the outrigger float is relatively small, it generates high pressure. With this being the case, JRC is requiring the use of outrigger cribbing or mats for all crane lifts on all projects. Outrigger cribbing will be required on all surfaces including concrete. Minimum outrigger cribbing is 4" thick hardwood or equal.

As a minimum the following formulas are offered for Outrigger Cribbing/Blocking on average soil:

Crane Capacity in tons / 5 = Area of Cribbing/Blocking in Square Feet

Examples:

20 Ton Capacity = 4 SQ FT of cribbing/blocking (20/5 = 4)

30 Ton Capacity = 6 SQ FT of cribbing/blocking (30/5 = 6)

100 Ton Capacity = 20 SQ FT of cribbing/blocking (100/5 = 20)

The subcontractor is responsible for confirming the ground pressures (via the manufacturer of the crane) exerted during the entire lifting process do not exceed what the ground is capable of supporting.

Rubber Tire Requirements

Rubber tire lifts (without the use of outriggers) are only allowed if the crane comes equipped with a rubber tire load chart. Outriggers shall always be used whenever the crane is performing a pick in a stationary location unless the outriggers cannot be used due to area restrictions.

Qualified Rigger

All subcontractors that will be lifting material over people or property in the fall zone must provide documentation that the workers performing the rigging activities meet OSHA's definition of a Qualified rigger.

Qualified Signal Person

All Signal Person's performing signaling activities to crane operator(s) via hand signals, audible, spoken, standard or nonstandard signals must provide documentation that they are qualified to do so.

Documentation of training must be submitted as part of the Crane Action Plan.

Airport Erection (FAA Requirements)

Any crane or other temporary fixture with the potential to be an aeronautical hazard, as defined by FAA AC 70/7460 must have FAA Obstruction Evaluation / Airport Airspace Analysis (OE/AAA) approval via the Form 7460-1 (Notice of Proposed Construction or Alteration) application process, prior to use or erection of such equipment.

For on airport construction the contractor shall supply all required information to the Airport Engineering and Planning Division who shall file Form 7460-1.

Additional requirements shall include:

- All cranes and high elevation devices shall fly a 3-foot square orange and white flag during daylight.
- Cranes, other high elevation devices and temporary structures 100 feet or more in height, or those of any height that will remain erected during the nighttime or when visibility is less than 1 mile, shall have a continuously operating beacon type flashing red warning beacon. An approved Form 7460-1 is required.

- If not approved for nighttime operations, cranes, other high elevation devices and temporary structures shall be lowered prior to legal sunset and not raised prior to legal sunrise.