



## Corporate Safety Plan

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## Safety and Health Policy Statement

OCC Construction Co., Inc. believes that **NO JOB OR NO TASK IS MORE IMPORTANT THAN WORKER HEALTH AND SAFETY.** If a job represents a potential safety or health threat, every effort will be made to plan a safe way to do the task.

Every procedure must be a safe procedure. Shortcuts in safe procedures by either supervisors or workers will not be tolerated.

If a worker observes any work activity that may pose a potential threat to their or others' health or safety, they must inform leadership and leadership must take adequate precautions.

**IF A JOB CANNOT BE DONE SAFELY, IT WILL NOT BE DONE.**

**OUR FUTURES ARE ONLY BUILT THROUGH OUR PEOPLE; WE AIM TO PROTECT THEM.**

**David Vivio**  
President

## Roles and Responsibilities

### ***Project Manager***

The Project Manager must lead the project team by setting an example for safety awareness as well as developing, communicating, and supervising the safety program. The Project Manager must enforce and set the tone for all safety-related issues during and before the planning of each project phase. They must provide leadership and show commitment to a safe and healthy environment. Responsibilities shall include conducting inspections, reviewing safety audits and safety compliance reports, and addressing health and safety issues on the job site.

### ***Superintendent***

The Superintendent must lead, oversee, and manage all site work, including safety. The Superintendent must ensure that safety procedures are applied effectively and that all employees are conforming to established policies, procedures, and regulations. Duties include conducting pre-installation meetings, establishing a site-specific safety plan, conducting morning huddles, performing inspections, ensuring site foremen comply with safety regulations, ensuring all crew members complete the site safety orientation, reviewing all incident and corrective action reports, confirming completion of Pre-Task Plans, conducting job hazard analysis, and enforcing disciplinary action when necessary. The Superintendent will also distribute weekly toolbox topics to subcontractors.

### ***Project Engineer***

The Project Engineer must collect all subcontractor safety programs, safety data sheets (SDS), and silica control plans and ensure all site foremen have access to project drawings. They will also complete site safety inspections and follow up on corrective actions as assigned. Project Engineers will also assist in conducting pre-Installation meetings, maintenance of the site-specific plan, and ensuring safety documents are completed and submitted promptly and saved in the correct location.

### ***Project Accountant***

The Project Accountant must ensure subcontractors' certificate of insurance remain active. Project Accountants must also follow all safety and health policies and procedures when on a project site and address or bring safety concerns to the attention of an OCC Site Safety Representative.

### ***Safety Manager***

The Safety Manager will assess the jobsite and worker safety practices and risks regularly via safety inspections. Responsibilities include providing education and training opportunities to all employees, conducting safety audits, discussing and providing toolbox talks, developing site-specific safety plans and procedures, reviewing subcontractor safety programs and safety data sheets (SDS), scheduling Pre-Task Plan meetings and overseeing implementation, issuing violation notices, issuing corrective actions, and managing the AGC/ MIOSHA alliance program. The Safety Manager will also conduct incident investigations and root cause analyses as needed. A report compiling project safety efforts and findings will be completed and shared monthly with the company.

### ***Site Safety Representative(s)***

A representative of OCC with the authority and knowledge to provide project safety assistance and emergency response. A Site Safety Representative must be present whenever work is being conducted.

## Implementation of Safety Program

The safety of our staff, subcontractors, partners, and the public is OCC's primary concern. The Company's safety program is designed with the intent to cover all bases through teamwork and open communication. We believe that this program, and the safety of our people, cannot be achieved without the efforts of our leadership, staff, and each crew member. Our safety is dependent on not only our actions but on the actions of those around us and their willingness to speak up and watch out for each other.

### **Project Safety Orientation**

#### **OCC Employees**

Each employee of OCC is required to complete the New Hire Safety Orientation and sign the necessary forms. The safety orientation will review OCC's safety culture, safety goals, roles and responsibilities, and means and methods of the safety program. At this time, all new hires will receive personal protective equipment and training as needed by position with the company. This orientation must be completed within the first week onboard and before beginning work on site.

#### **Trade Partners**

All site personnel must complete the Site-Specific Safety Orientation immediately upon their first day arriving on site. Upon completion of the Safety Orientation, a labeled sticker will be given to each employee which must be worn on their hard hat. Workers will not be allowed to work on the job site without this sticker on their hard hats.

### **Safety Inspections**

1. OCC's Site Safety Representatives will conduct weekly safety inspections and review all necessary safety documents (Pre-Task Plan, crane plan, subcontractor safety plan, etc.).
2. Procore will be the software utilized for inspections, observations, and notification of violations.
3. Subcontractors shall perform daily safety inspections of their work area and equipment per MIOSHA requirements.
4. During inspections, the Site Safety Representatives will identify and evaluate all potential hazards for the possibility of severe injury, probability of accident occurrence, and compliance with OCC policies and procedures as well as state and federal regulations.
5. The Site Safety Representatives will also consider the skill and knowledge level demonstrated by exposed workers.
6. The Site Safety Representatives shall then take the following actions:
  - a. Discuss all hazards with the necessary parties.
  - b. Explain appropriate recommendations and precautions.
  - c. Assist with any necessary training (i.e., provide appropriate Toolbox Talks or contact the Safety Manager for assistance), in accordance with the level of hazard.
  - d. Issue violations and corrective actions.

7. Records shall be maintained for all recommendations, precautions, and training for each hazard identified.
8. All incidents, regardless of severity, will be discussed at the next project safety meeting, with an emphasis on eliminating future occurrences.

### *Third-Party Inspections and Safety Audits*

Third-party inspections are focused safety inspections completed by one of the following:

- a. An OCC employee who is not a member of the project team
- b. An OCC-approved third-party inspector (i.e. MIOSHA CET, CNA, etc.)
- c. The Safety Manager

These inspections are focused on the OCC's Focused Six categories of safety. When the inspection is completed during a third-party inspection, the inspection template will be completed by the Safety Manager in reflection of the inspectors' findings.

OCC's Safety Manager will conduct monthly audits of each project site. These audits will include an all-encompassing detailed assessment of site conditions, personnel behavior, safe working practices, equipment, and safety documentation. The results of the audit will be shared with the project team members, corrective actions sent to respective parties, and the overall score added to the safety compliance report.

### *Loss Prevention Inspections*

Loss Prevention Inspections will be conducted monthly on each project by either the Safety Manager or a Site Safety Representative. This inspection is to ensure all site-specific measures are in place to better prevent incidents of theft, water damage, fire damage, environmental damage, and emergency response readiness.

### *Fire Prevention Program*

OCC is committed to minimizing the threat of fire to employees, visitors, and property. It is the responsibility of the subcontractor to have their own Fire Prevention Program (FPP) and to instruct and train all employees in fire prevention and fire response.

#### **General Fire Safety**

- Smoking is prohibited in all OCC project buildings.
- A proper means of egress must be established and maintained for the interior and exterior by all personnel. This may require strategic material laydown and storage planning as well as additional site work.
- During demolition, firewalls and means of egress shall be retained until removal is necessary.
- Three (3) feet of clearance must be maintained from sprinkler heads.

#### **Portable Heaters**

- Portable heaters are discouraged from being used by subcontractors. If a portable heater is necessary, the subcontractor must request permission from the Superintendent. Subcontractors must then engage the services of a reputable vendor experienced and trained in this application and properly insured.

- The operator(s) of any heating unit must be properly instructed in its use.
- All equipment shall meet all current safety standards, must be installed and operated per the manufacturer's recommendations, and cannot be left unattended while in operation.
- A fire extinguisher must always be located within five (5) feet of heaters.
- Safe zones must be clearly marked on the floor.
  - Storage or warming of materials is strictly prohibited in the safe zone.
- Carbon monoxide detectors must be installed indoors near any operable portable heating units.

#### **Hot Work**

- When cutting, welding, and open flame work is performed, the subcontractor must pull a hot work permit from an OCC Site Safety Representative.

#### **Flammable Materials**

- All flammable materials must be properly secured and stored outdoors.
  - Flammable liquids greater than one (1) gallon require a safety can.
  - A maximum of twenty-five (25) gallons can be stored outside of a properly labeled flammable materials storage cabinet.
  - No smoking or open flames signage must be posted on flammable materials cabinets.
- Flammable material cannot be stored near exits or stairways.

#### **Portable Tanks and Containers**

- Units between 501-6,000 pounds must not be nearer than ten (10) feet to a building.
- Units between 6,001-10,000 pounds must not be nearer than twenty (20) feet to a building.
- Groups of two (2) or more containers must be separated by a five (5) foot clearance.
- Units must be protected against collision damage.
- Dispensing unit nozzle latch open devices must be disengaged or removed when on-site.
- Containers must be closed when not in use.
- A fire extinguisher must be no closer than twenty-five (25) feet and no further than seventy-five (75) feet from a dispensing unit.
- No smoking or open flames signage must be posted near units.

#### **Fire Extinguishers**

- Must be readily available every 3,000 square feet, within eighty (80) feet of travel, and at least one (1) per floor.
- Shall be located and labeled so it can be readily seen and accessible along normal paths of travel.
- In multi-story buildings, at least one (1) extinguisher must be adjacent to a stairway.
- Storage of material is prohibited in front of a fire extinguisher.
- Require a monthly inspection. Any defective device must be removed from service immediately.



### *Silica Control Plan*

All trades performing an operation that may generate dust containing silica or will work with materials that may contain silica or are sand-based must provide OCC with a copy of their Silica Control Plan. If the subcontractor does not have a Silica Control Plan, they may create one at: [www.silica-safe.org](http://www.silica-safe.org).

#### **Materials that may contain silica:**

Asphalt, brick, cement, concrete/concrete block, drywall, fiber cement products, mortar, plaster, sand, clay and ceramic tile, and more...

#### **Dust generating operations:**

Abrasive blasting, cutting/sawing, demo/disturbing, drilling, coring, grinding, jackhammering, mixing/pouring, sanding, scraping, sweeping/cleaning up, and more...

#### **Acceptable Silica Control Methods:**

Eliminate or substitute silica-containing material, effective local exhaust, vacuum tool system, wet cutting or addition of water to the operation, job rotation to limit exposure time, respirator protection, and more...

All precautions listed in the control plan must be followed so as to not endanger or expose any onsite personnel. Including those working in the area or downwind from operations.

MIOSHA's housekeeping standard prohibits the use of dry sweeping or dry brushing where such activity could contribute to employee exposure to respirable crystalline silica. Wet sweeping, HEPA-filtered vacuuming, sweeping compound(S), or other methods that minimize the likelihood of exposure must be utilized.

## Hazard Communication Program

### **Purpose and Scope**

The following Hazard Communication Program has been established by OCC. The purpose of this program is to ensure that employees are informed about the dangers of all known hazardous chemicals used and stored by OCC and our contractors. This Hazard Communication Program includes the following components:

1. Definitions
2. Roles and Responsibilities
3. Implementation
4. Employee and Site Notification
5. Chemical Exposure Emergency Response
6. Employee Training and Information
7. Recordkeeping
8. Annual Review

### **Definitions**

**Employee** – a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.

**Contractor** – person(s) hired by OCC to conduct a contracted task or scope of work.

**Hazard Class** – the nature of the physical or health hazards (i.e. flammable solid, carcinogen, oral acute toxicity).

**Hazard Statement** – a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical.

#### **Examples**

- a. Highly flammable liquid and vapor.
- b. May cause liver and kidney damage.

**Hazardous Chemical** – any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

**Health Hazard** – a chemical which is classified as posing one of the following hazardous effects:

- Acute toxicity (any route of exposure)
- Skin corrosion or irritation
- Serious eye damage or eye irritation
- Respiratory or skin sensitization
- Germ cell mutagenicity
- Carcinogenicity
- Reproductive toxicity
- Specific target organ toxicity (single or repeat exposure)
- Aspiration hazard

**Label** – an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical or outside packaging.

**Non-Routine Task** - is an activity or set of activities that are not generally performed on a routine basis. A task that an employee does not normally perform and for which the employee has not previously been trained.

**Physical Hazard** – a chemical that is classified as posing one of the following hazardous effects

- Explosive
- Flammable (gases, aerosols, liquids or solids)
- Oxidizer (liquid, solid or gas)
- Self-reactive
- Pyrophoric (liquid or solid)
- Self-heating
- Organic peroxide
- Corrosive to metal
- Gas under pressure
- Emits flammable gas when in contact with water

**Pictograms** - symbol plus other graphic elements intended to convey specific information about the hazards of a chemical.

#### Examples



**Precautionary Statement** - phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical.

#### Examples

- Ground and bond container and receiving equipment.
- Do not breathe vapors.
- Wear protective gloves.

**Product Identifier** – the name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means for which a user can identify the chemical.

**Safety Data Sheet (SDS)** – written or printed material concerning a hazardous chemical that is prepared in accordance with OSHA’s standard.

**Signal Word** - word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. Signal words used in this program are “danger” and “warning” where “**Danger**” is used for the more severe hazards and “**Warning**” is used for less severe.

**Substance** – chemical elements and their compounds in the natural state or obtained by any production process.

**Work Area** – a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

**Workplace** – any location where work is conducted under the supervision of OCC. This includes, but is not limited to offices, job sites, workshops, and warehouses.

### Roles and Responsibilities

**Safety Manager** is responsible for the following:

- Ensures that a written program is in place
- Reviews the program periodically and monitors to ensure compliance in the office and jobsites
- Oversees the effectiveness of the program
- Provides technical assistance on selection, use and disposal of hazardous chemicals
- Ensures that employees receive general training and that training is documented
- Requests an SDS from the manufacturer or vendor for purchases of hazardous chemicals

- Maintains and updates the Hazardous Chemical Inventory Lists (office)
- Maintains and updates the SDS database (office)
- Notifies employees of newly introduced chemicals (office)

**Employees** are responsible for the following:

- Complies with this program
- Completes required training
- Informs Safety Manager if introducing new chemical to work area
- Appropriately uses, maintains, and disposes of hazardous chemicals
- Notifies the Safety Manager of concerns or problems with hazardous chemicals used or stored around the workplace

**Project Engineer** is responsible for the following:

- Request and receive a copy of contactors written HAZCOM program prior to mobilization to the workplace
- Request and receive an SDS for each hazardous substance a contractor may bring into the workplace to which employees and other contractors could be exposed prior to mobilization to the workplace
- Maintains and updates the jobsite Hazardous Chemical Inventory List
- Maintains and updates the jobsite SDS database
- Notifies the Safety Manager when a new hazardous chemical is introduced that may impact HAZCOM requirements

**Superintendent** is responsible for the following:

- Ensures all received, maintained and stored containers are properly labeled
- Ensures SDS's are received and forwarded to the Project Engineer for electronic input
- Maintains and updates the jobsite Hazardous Chemical Inventory List
- Maintains and updates the jobsite SDS database
- Notifies the onsite subcontractors of new or upcoming hazardous chemicals to site during a weekly trade meeting or morning huddle
- Notifies the Safety Manager when a new hazardous chemical is introduced that may impact HAZCOM requirements

**Project Manager** is responsible for the following:

- Request a copy of contactors written HAZCOM program during the post-bid process
- Request an SDS for each hazardous substance a contractor may bring into the workplace to which employees and other contractors could be exposed during the post-bid process
- Ensures the project team complies with the guidelines established by this program
- Notifies the onsite subcontractors of new or upcoming hazardous chemicals to site during a weekly trade meeting or morning huddle
- Notifies the Safety Manager when a new hazardous chemical is introduced that may impact HAZCOM requirements

**Contractors** are responsible for the following:

- Provides OCC with a copy of their written HAZCOM program that fulfills all regulatory requirements or follows the guidance in this program

- Provides OCC with an SDS for each hazardous substance they bring into the workplace to which employees and other contractors could be exposed
- Receives information regarding where they can locate the workplace HAZCOM Program
- Have ready accessibility to the chemical inventory list and SDS for any hazardous chemical they could reasonably be expected to come into contact within the course of their work.

## **Implementation**

### **Hazardous Chemical Evaluation**

Chemical manufacturers or importers shall evaluate chemicals they produced or import to classify the chemicals in accordance with the Hazard Communication Standard. For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and where appropriate, the category of each class that apply to the chemical being classified. This information will be placed in the SDS and on the product label. OCC will rely on SDSs obtained from the product suppliers to determine which chemicals are classified as hazardous for employees.

### **Hazardous Chemical Inventory List**

A list that identifies all known hazardous chemicals with a potential for employee exposure used or stored at the workplace will be updated periodically and posted in the kitchen of the Troy Office and in the site office of each OCC Construction jobsite. An electronic copy shall be maintained for all respective workplaces. Detailed information about the physical, health, and other hazards of each chemical is included in a SDS; the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its SDS.

The Hazardous Chemical Inventory List shall include the following information:

- Product Identifier
- Product Name
- Manufacturer
- Use/Location of Use
- Hazard(s)
- Required Personal Protective Equipment (PPE)
- Responsible Contractor

An electronic copy shall be maintained for all respective workplaces. The most current Hazardous Chemical Inventory List will be accessible to employees digitally in the following locations:

- Troy Office: DCI → OCC → Procedures → Safety and Loss Control → Hazard Communication Program
- Jobsites: DCI → OCC → Projects → Ops → Project Folder → Safety → SDS

Upon receiving any new chemical or SDS, the appropriate party must be forwarded the SDS as soon as possible, be inputted into the electronic database and properly stored. Updated electronic databases must be printed off and displayed at the designated HAZCOM program location.

## Safety Data Sheet (SDS)

SDSs are readily available to all employees electronically. OCC shall maintain a current SDS of each chemical listed in the Hazardous Chemical Inventory List.

Employees can review SDSs for all hazardous chemicals to which they may be exposed in the DCI SharePoint drive as described above. If SDSs are not immediately available or new chemicals in use do not have an SDS, please immediately notify the appropriate party:

- For office: Safety Manager
- For jobsites: Project Engineer or Superintendent

## Labeling

All containers of hazardous chemicals at the office and jobsite must be properly labeled. All existing labels on incoming containers and secondary containers of hazardous chemicals must not be removed or defaced. The label must contain the following information:

1. Product identifier / Name
2. Signal word
3. Hazard statement
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

To further ensure that employees are aware of hazards associated with the chemicals used in their work areas, all employees and contractors are required to label all secondary containers. Secondary containers will be labeled with an alternative GHS secondary container label (pictured below).

|                     |  |
|---------------------|--|
| PRODUCT IDENTIFIER: |  |
|                     | SIGNAL WORD<br><input type="checkbox"/> DANGER<br><input type="checkbox"/> WARNING |
|                     | HAZARD/PRECAUTIONARY INFO  |
|                     | HEALTH   |
|                     | FLAMMABILITY   |
|                     | REACTIVITY   |
|                     | PERSONAL PROTECTION  |
|                     | SUPPLIER INFORMATION   |

The only exception to not labeling a secondary container is the transferred chemical will be used **immediately by the employee who performed the transfer.**

## Non-Routine Tasks

Occasionally, employees are required to perform hazardous non-routine tasks. Prior to performing such tasks, each affected employee must contact the workplace supervisor to develop a written operating procedure. This procedure must include:

- Step by step directions on how to perform the task
- Statements of the specific chemical hazards involved
- Required PPE/Safety measure that employee(s) must take

Examples of non-routine tasks that may expose employees to hazardous chemicals include, but is not limited to:

- Cleaning chemical residue from a floor, tank or secondary chemical container
- Chemical spill or debris cleanup involving hazardous chemicals
- Use of hazardous chemicals during infrequent maintenance or repair work
- Disposal of outdated products

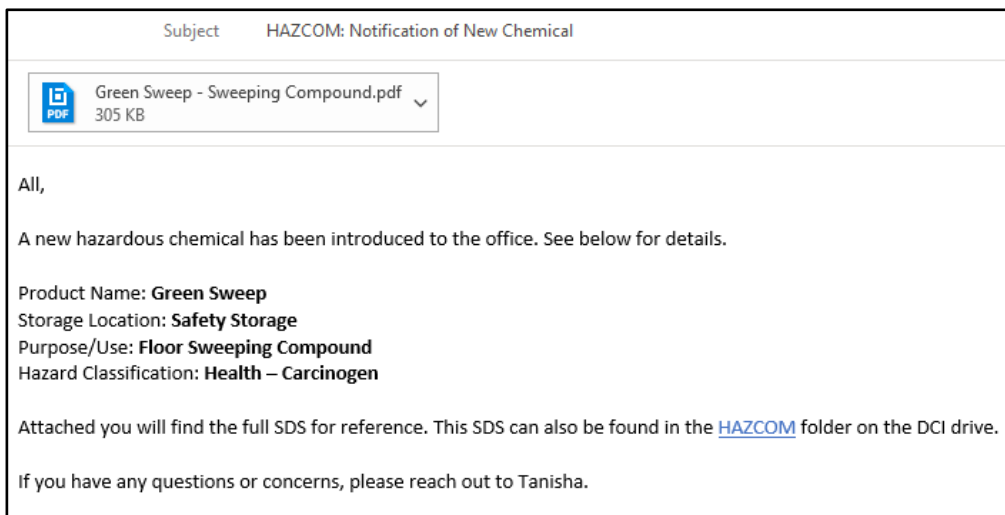
## Chemicals in Unlabeled Pipes

On occasion, work activities may be performed by workers in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the worker shall be informed by the workplace supervisor about the identity and hazards of the chemicals in the pipe, as well as precautionary measures required to be followed.

## Employee and Site Notification

### Troy Office Procedure

Following reception and proper logging of a new hazardous chemical in the office, a notification of a new chemical will be emailed to all DCI Staff. This email will outline general information regarding the chemical, an attached copy of the chemical SDS, and the location for where the SDS can be located later. **See sample email below:**



### Field Office Procedure

Per position responsibilities outlined above, the field team shall request and log all subcontractor SDSs in the designated project SDS folder. Confirmation of hazardous chemicals set to be introduced to the jobsite as well as an estimated date, shall be noted during “Phase 1: Construction Submittals and Documentation Requirements” of the 4 Phases of Quality Control Pre-Installation meeting. Following this meeting, the Project Engineer or Superintendent must update the Chemical Inventory List to be posted in the jobsite office prior to the hazardous chemical’s arrival to site. In addition to posting the updated Chemical Inventory List, the project team shall notify the onsite subcontractors during a weekly trade meeting or morning huddle.

## Chemical Exposure Emergency Response

Accidental release of chemicals can occur at any time. The release could result in either a harmful exposure to a person or a chemical spill to work areas or the environment. Chemical exposures can be a very serious incident and cause significant harm to a person or the environment, depending on the type and quantity of the chemical released. The following sections provide general guidelines on how to respond to a chemical exposure or a chemical spill.

If you have any doubts about your ability to handle a chemical exposure or spill, **STOP and call 911.**

### In Case of Chemical Exposure to Person

1. Get away from the area/remove person from exposure.
  - Alert others in area to evacuate.
2. Notify your supervisor **IMMEDIATELY**.
3. If medical assistance is needed, **call 911** immediately.
  - Provide as much information known about the incident (location, extent of injuries, name, quantity, etc.)
4. Get it off your body as soon as you can.
5. Consult the SDS for any potential delayed effects.
6. Obtain a medical evaluation/necessary treatment, if needed.

### In Case of Spill of Immediately Dangerous to Life or Health (IDLH) Chemicals

These spills, in the opinion of the area supervisor or other knowledgeable person pose an immediate health threat to individuals in the immediate area or other occupants in the building. **DO NOT ATTEMPT TO CLEAN UP THESE SPILLS BY YOURSELF.** Instead:

1. **Sound the fire alarm** to notify others in the area for evacuation.
2. **Call 911 from a safe location** and provide the following information:
  - a. Nature of emergency (chemical spill)
  - b. Chemical type and quantity
  - c. Location of spill
  - d. Your location
3. **Remain on scene at a safe distance** to meet response personnel.

This procedure must be followed in the event of a nearby train derailment of any kind.

### In Case of Spill of Chemicals That Can be Cleaned Up by Knowledgeable Area Personnel

Spills that individuals or a supervisor feel is not an immediate threat to personnel or the environment and is small enough that trained, knowledgeable area personnel can safely clean-up, must follow these guidelines:

1. Individuals must be thoroughly familiar with the hazards of the material. (refer to chemical SDS)
2. Individuals must be trained to deal with chemical spills of the size in question.
3. Individuals must have the proper PPE needed for spill clean-up.
4. The appropriate absorbent/neutralizers must be readily available. (check spill kits)
5. Confine the spill and limit the area impacted as much as possible, without taking risks.
6. Clean-up spill using appropriate equipment and procedures.
7. All spill clean-up waste **MUST** be properly disposed.

### Employee Training and Information

OCC requires that all employees receive training informing them of our Hazard Communication Program. Employees must be adequately trained on the following topics:

- a. An overview of the requirements in OSHA's Hazard Communication Standard
- b. An overview of OCC's Hazard Communication Program



- c. The location of the written Hazard Communication Program and where it may be reviewed
- d. How and where to locate the Hazardous Chemical List and SDSs in their work area(s)
- e. How to understand and use the information on labels and in SDSs
  - What are pictograms?
  - What are signal words?
  - What are the hazard statements?
  - What are the precautionary statements?
- f. How to properly fill out an alternative GHS Secondary Container Label
- g. Hazardous chemicals present in the workplace
- h. Any operations in their work area where hazardous chemicals are used
- i. Physical and health hazards of the chemicals in their work areas
- j. Steps we have taken to prevent or reduce exposure to these chemicals
- k. Methods and observations that will be used to detect the presence or release of a hazardous chemical
- l. Procedures and hazards associated with non-routine tasks
- m. How employees can protect themselves from exposure to these hazardous chemicals through use of engineering controls/work practices and PPE
- n. Emergency procedures to follow if an employee is exposed to these chemicals

During the New Hire Orientation process each employee must receive general training stipulated above. Each employee must receive an annual refresher training on OCC's HAZCOM program.

Employees may also receive re-training whenever a new chemical hazard is introduced into the workplace, the employee's supervisor becomes aware the employee has demonstrated unsafe work practices, upon recommendation following an accident investigation, or whenever the supervisor deems appropriate and necessary to maintain safe work practices.

### **Recordkeeping**

The Safety Manager will provide HAZCOM re/training and be responsible for maintaining training records. Records will include names of the individual trained, type of training, date of training and name of the trainer. SDSs for chemicals that are no longer actively used will be kept in an archive for 30 years.

### **Annual Review**

The HAZCOM Program will be reviewed by the Safety Manager and Human Resource Manager annually. The review will include current training, procedures and any documents associated with this program. When new tasks, procedures, and/or positions are added or modified/revised which affect hazardous chemicals, the HAZCOM Program will be updated immediately to reflect these changes.

# Explanation of Hazard Pictograms



## Health Hazard

- Carcinogen
- Mutagenicity
- Reproductive Toxicity
- Respiratory Sensitizer
- Target Organ Toxicity
- Aspiration Toxicity



## Skull and Crossbones

- Acute Toxicity (fatal or toxic)



## Flame

- Flammables
- Pyrophorics
- Self-Heating
- Emits Flammable Gas
- Self-Reactives
- Organic Peroxides



## Flame over Circle

- Oxidizers



## Gas Cylinder

- Gases under pressure



## Exploding Bomb

- Explosives
- Self-Reactives
- Organic Peroxides



## Corrosion

- Skin Corrosion/burns
- Eye Damage
- Corrosive to Metals



## Environment

- **\*(non mandatory)**
- Aquatic Toxicity



## Exclamation Mark

- Irritant (skin and eye)
- Skin Sensitizer
- Acute Toxicity (harmful)
- Narcotic Effects
- Respiratory Tract Irritant
- Hazardous to Ozone Layer (Non Mandatory)



# SAMPLE JOBSITE Chemical Inventory List

This list is periodically reviewed and updated. The list is cross-referenced with the SDS and is kept with the SDS to serve as an index to help employees identify and locate necessary information.

| ID / Name    | Manuf. | Location Used                | Est. Arrival | Hazard(s)  | PPE            |
|--------------|--------|------------------------------|--------------|--|----------------|
| Green Sweep  | Uline  | Sweeping throughout building | Feb. 2023    | Carcinogen Cat. 1A, Target Organ Toxicity – Repeat Exposure Cat. 1 | Safety Glasses |
| Red Sweep    | Uline  | Sweeping throughout building | Feb. 2023    | Carcinogen Cat. 1A, Target Organ Toxicity – Repeat Exposure Cat. 1 | Safety Glasses |
| Yellow Sweep | Uline  | Sweeping throughout building | Feb. 2023    | Carcinogen Cat. 1A, Target Organ Toxicity – Repeat Exposure Cat. 1 | Safety Glasses |
|              |        |                              |              |  |                |
|              |        |                              |              |  |                |
|              |        |                              |              |  |                |
|              |        |                              |              |  |                |
|              |        |                              |              |  |                |
|              |        |                              |              |  |                |

## Emergency Response and Evacuation

### **On-site Emergency Response**

In the event of an emergency on-site, an OCC Site Safety Representative must alert all site personnel immediately. The Site Safety Representative will sound a siren and announce directions from a provided megaphone. All personnel must immediately discontinue working and evacuate to a safe location (designated on the site-specific safety plan). Foremen shall account for all workers in their crew and must report to the project Superintendent for further instructions. The Superintendent will instruct the foremen according to circumstances to remain at the rally point(s) or to retreat to a safer distance. A member of OCC's project team must notify the Safety Manager of an emergency as soon as they are able. An OCC Site Safety Representative will announce when it is safe to return to work or if other steps are to be taken.

Emergencies include, but are not limited to:

- A serious or life-threatening injury
- Severe weather or impending natural disaster
- Contact with underground or overhead utilities
- Falls from height (suspended or otherwise)
- Chemical spill
- Fire
- Bomb threat

### **Troy Office Emergency Response:**

In the event of a facility disaster or disruption of operation, staff should refer to the OCC Business Continuity Plan for details on the appropriate response to be taken for the following emergencies:

- Fire
- Medical Emergency
- Natural Disaster
- Power Outage
- Gas Leak/Hazardous Material Spill
- Bomb Threat
- Agitated Person
- Armed Intruder/Active Shooter
- Pandemic

## Accidents, Incidents and Near Misses

OCC will investigate all accidents. The extent of such an investigation will reflect the seriousness of the incident. Through a root cause analysis process, OCC will determine the cause of the incident, implement corrective actions as needed, and communicate the findings to the project site to prevent potential recurrences. Lessons learned will be reviewed at OCC's company level and any changes to processes will be implemented to prevent similar events in the future across all project sites.

### **Incident Categories**

- Minor - report only, first aid
- Moderate - medically treated, restricted work
- Major - lost time
- Critical - amputation, fatality
- Near Miss – a potential hazard or incident where no damage or personal injury was sustained, but given a slight shift in time or position, significant damage or injury could have occurred.

## **Accident Follow-Up**

When an incident occurs, the following steps must be taken:

1. Subcontractors/employees shall report all work-related injuries, illnesses, near misses, property damage, and environmental incidents such as a spill or release of hazardous materials, regardless of severity, immediately to the Project Superintendent and OCC's Safety Manager.
2. The trade Foreman and site supervisor must ensure the area is secure from the potential of another injury occurring.
3. The appropriate emergency service or the trade Foreman should provide transportation to the nearest clinic or hospital if needed.
4. The injured person, Foreman, and any witnesses must report all facts of the accident to the OCC site supervisor as soon as possible.
5. The injured person's company is to provide an incident report to OCC within 24 hours.
6. An incident report must be provided for near misses, first aid, recordable injuries, third-party property damage or personal injury, and builder's risk claims.
7. Follow-up information on personal injuries (i.e. doctor's reports, insurance, worker's compensation reports, etc.) must be forwarded to the appropriate OCC staff member within a reasonable timeframe.

Any worker suspected of being under the influence of drugs or alcohol, or is found to have caused an accident, may be subject to screening.

### Morning Huddles

Morning huddles will be conducted by the Project Superintendent or an available project team member each morning. A representative from each on-site subcontractor is required to attend. These meetings will be used to communicate site announcements, discuss any incidents or near-misses, distribute toolbox talks, and collect and review Pre-Task Plans. In addition, each subcontractor will provide an overview of their manpower, the scope of work to be completed for the day, scheduled deliveries, and any other coordinating topics or concerns.

### Toolbox Talks

Toolbox talks will be provided to each on-site Foreman weekly by an OCC Site Safety Representative. Toolbox topics should be relevant to the construction activities taking place on the job site. The foremen have the responsibility of reviewing this document with their crew members, collecting signatures from each member present for the discussion, and submitting the signed copy to the Project Superintendent or submitting a digital acknowledgment. Subcontractors may review a toolbox talk more relevant to their scope instead of the OCC-provided topic if desired, however, documentation must still be submitted to the Project Superintendent. All collected toolbox talks must be properly filed in the respective project's safety folder or as a Procore form.

### Group Job Hazard Analysis

Once a week, all on-site subcontractors must provide an on-site representative to attend the Group Job Hazard Analysis. This is typically conducted during the weekly trade meeting but may vary depending on the project team. The JHA will highlight high-risk operations to be conducted on-site over the next week, equipment to be used, intended methods of control, and further safety precautions that may need to be taken. All JHAs must be recorded and properly filed in the respective project's safety folder or as a Procore form.

### Pre-Task Plans

Pre-Task Plan requirements will be discussed during the pre-installation meeting, trade coordination meetings, and morning huddles. These PTPs are available on Procore as a fillable form for ease of access and can be provided as hard copies by OCC as needed. It is OCC's preference that these documents be completed by the subcontractor's on-site representatives. At times, the subcontractor's Project Manager or office staff may

complete these forms, however, they must be signed off on by an on-site representative to ensure all parties involved in the actual operation are on the same page. Pre-Task Plans are required to be completed before the following, but not limited to:

|                          |   |
|--------------------------|---|
| Crane and Rigging        | Fall Prevention (six (6) feet or greater) |
| Steel Erection           | Scaffolding (six (6) feet or greater)     |
| Masonry Wall Bracing     | Aerial Work Platforms                     |
| Excavation and Trenching | Forklifts / Rough Terrain Forklifts       |

### *Watch My 6*

Though all components of safety require attention, OCC places high importance on the following six (6) divisions:

|                 |             |                |
|-----------------|-------------|----------------|
| Fall Protection | PPE         | Stairs/Ladders |
| Electrical      | Scaffolding | Housekeeping   |

All personnel including management, supervisors, and field workers are expected to slow down and take additional care and planning when operating within each of these categories. Furthermore, personnel should pay extra attention to others working within these divisions to potentially alert them of any safety concerns or hazards they may see. Taking time to watch out not only for ourselves but for others as well.

### *Monthly Safety Compliance Report*

Each month, OCC's Safety Manager conducts a safety program audit of each job site. This audit will include all aspects of the safety program: documentation (Pre-Task Plans, job hazard analysis, incident reports, etc.), observations, safety violations, toolbox talks, and manpower. This information will be compiled into one report and reviewed with all staff members of OCC. Specific topics requiring further explanation or review will be discussed at a more focused group level.

### *See Something, Say Something, Save a Life Program*

Each project site is equipped with QR code posters that include a "Suggestions and Concerns" link. This link accesses a form that allows personnel to anonymously voice safety concerns or opinions. Your opinions and concerns matter to us and could help save a life by improving our job sites and procedures.

## Safety Discipline

The Company reserves the right to remove offending or insubordinate parties from the job site, either temporarily or for the duration of the project. A written report shall be sent to the proper authority of the offending party's company with a copy to the OCC Project Manager and the trade company's President. A record of this incident shall be included in the Superintendent's daily report. This written violation may carry a monetary penalty that can be deducted from the subcontractor's contract amount.

Committing unsafe acts and or practices that are considered Immediately Dangerous to Life and Health (IDLH) may result in immediate termination from the project. The Company also reserves the right to immediately sanction a subcontractor. Sanctions include immediate abatement of the IDLH condition/hazard and issuance of fines to the subcontractor. OCC reserves the right to terminate a contractor for IDLH safety violations. IDLH safety violations may include, but are not limited to:

- Failure to follow fall protection requirements.
- Failure to follow open-hole protection requirements.
- Removing guardrails and not putting them back in place.
- Working in an unprotected trench greater than five (5) feet deep.
- Failure to wear proper respiratory protection.
- Failure to follow the Substance Abuse Policy will result in a fine and removal from the job.
- Failure to wear proper PPE.
- Possession of firearms, explosives, or dangerous weapons.
- Violation of project security rules and procedures.
- Entering a confined space without proper training, certification, and/or adherence to procedures.
- Failure to follow lock-out/tag-out procedures.

While it is not practical to detail every circumstance or type of violation, the items mentioned above tend to be the most common. However, if workers fail to follow safe work practices not covered by this policy, disciplinary action and or fine will be assessed based on the Company or on-site Superintendent/Project Manager's assessment of the violation.



## General Rules

OCC aims to provide safe working conditions on each job site and office. All employees, visitors, and delivery drivers are expected to follow all policies and procedures.

Misconduct of any kind will not be tolerated, this includes, but is not limited to the possession of, under the influence of, or use of:

- alcoholic beverages
- illegal drug use (including marijuana),
- theft
- vandalism
- firearms
- fighting
- horseplay
- discrimination
- sexual harassment

Partaking in any of the above listed is grounds for suspension, removal from a project site, or termination of employment or contract. Supervisors must be informed if taking strong prescription medication that warns against driving or using machinery.

Smoking and vaping are prohibited while working as well as in and on top of the project building(s), construction office(s), and all other facilities related to this project. Smoking is only allowed at locations designated by OCC which can be found on the site logistics plans. OCC and its employees are required to adhere to all state, as well as local municipality laws and/or ordinances both at the office locations as well as site locations regarding smoking in the workplace. If you have any questions regarding the specific laws/ordinances, please speak to your immediate supervisor.

Hard hats, safety glasses, work boots, and high-visibility clothing are required while on an OCC job site. All other PPE shall be worn as required by MIOSHA standards. Precautions should be taken to prevent burns, including sunburn. Seek medical attention for any serious burn received.

## Scope Specific Safety

### Aerial Work Platform (AWP) / Mobile Elevated Work Platform (MEWP)

1. A Pre-Task Plan is required to be completed before use of aerial work platforms.
2. Operated by trained and authorized personnel only. Employees must have operator's certification readily available.
3. All AWP's must be inspected daily. The inspection checklist must be readily available if requested.
4. All AWP equipment must be well maintained including legible safety decals and the operator's manual stored on the platform.
5. All employees must always wear a body harness and be tied off inside the basket when elevated.
6. Self-Retracting Lanyards and Positioning Lanyards are preferred for use on an AWP.
7. AWP's shall not be altered outside of the manufacturers' specifications, this includes makeshift workbenches, tool trays, or material carriers.
8. Lifts should only be operated in accordance with the manufacturer's manual.
9. Areas beneath the elevated AWP must be barricaded off and doors that exit to area must be blocked or locked with warning signage to protect from dropped object hazards.

### Block Masonry

1. The mason subcontractor must complete a Pre-Task Plan and provide a wall bracing plan before the start of work, if applicable.
2. The subcontractor must provide a silica control plan before the start of work.
3. A competent person, per MIOSHA standards, must conduct daily inspections of scaffold equipment. An inspection tag must be visible at all times.
4. Restricted fall zone areas must be established before the construction of the wall and will be restricted to employees who are actively engaged in constructing the wall.
5. Employees working within a restricted fall zone must be trained and certified to work in a restricted fall zone area.
6. Masonry block walls at heights of 8 feet or greater, not tied into the structure, must be adequately braced per MIOSHA standards.

### Concrete

1. All exposed rebar will be capped or covered to protect against impalement or injury. The caps must have a steel-reinforced flat top.
2. Employees operating equipment such as vibrators, pump nozzles, and/or buggies will wear appropriate clothing and PPE, such as boots, eye protection, and hearing protection. Precautions should be taken to protect against skin exposure to the concrete mix.
3. The concrete contractor must appropriately barricade the working area during concrete forming and after concrete has been poured.
4. Material used for formwork must be removed and properly disposed of. The subcontractor will remove all debris and conduct a cleanup of the work area daily.

### Confined Spaces

1. Confined spaces and permit-required confined spaces may be present on site.
2. For a work area to be considered a confined space it must meet **all three (3)** of the following:
  - Limited openings for entry and exit
  - The space is not intended for continuous human occupancy.
  - The space is large enough for you to enter and conduct work.
3. A permit-required confined space is a confined space **IN ADDITION** to **one (1)** of the following:
  - Contains or could contain a hazardous or potentially hazardous atmosphere.
  - Contains material that has the potential to engulf the entrant.

- Has or could have inwardly converging walls that could trap or asphyxiate an entrant.
  - Contains or could contain other serious physical hazards such as unguarded machines or exposed live wires.
  - Has or could have any other recognized safety or health hazards.
4. Examples of potential confined spaces and permit-required confined spaces include, but are not limited to:
    - Elevator Pits
    - Tunnels
    - Manholes
    - Pipelines
    - Storage Containers
    - Crawl spaces
  5. All subcontractors must evaluate their workspaces to determine whether they contain a permit-required confined space. If the subcontractor is unsure, they should discuss it with an OCC Site Safety Representative.
  6. If it is determined that the space is a permit-required confined space, all workers on site must be informed of the danger during the morning huddle, weekly trades meeting, and danger signage posted on site.
  7. Before any work can commence within the permit-required confined space, each subcontractor set to enter the space must pull a permit from an OCC site supervisor each day work is to take place within the space.

### *Cranes and Rigging*

1. The following items must be provided to OCC **before** a crane is delivered to the site:
  - a. Copy of Operator's License
  - b. Crane Operator Evaluation Form
  - c. Crane's specifications
  - d. Proof of annual crane inspection
  - e. Copy of Rigging Insurance
  - f. Lift plan
  - g. Pre-Task Plan

**If at any point the crane or operator is changed, the corresponding documents must be reissued.**

2. All cranes are to be inspected daily.
3. Outriggers must be fully extended and on stable ground.
4. The swing radius of all cranes must be properly barricaded.
5. The area below all suspended loads must be barricaded. All workers must refrain from being under a suspended load.

### *Drywall*

1. The subcontractor must provide a silica control plan before the start of work.
2. Due to the nature of the work, intermittent cleanup is required throughout the day in addition to the end-of-day cleanup is required.
3. Proper PPE must be worn at all times by employees, no matter the phase of the project.
4. Employees must practice safe material handling techniques.
5. If material is to be delivered through an upper-level wall opening or window, employees are required to:
  - Have the operator's license to use the equipment.
  - Inspect equipment daily.
  - Have fall protection to accept delivery of material.
  - The room accepting material must warn of the fall hazard and all parties inside must be protected from the hazard.
6. If any installed safety devices such as temporary guardrails, temporary handrails, or temporary lighting must be removed for drywall installation, they must be reinstalled as soon as possible.

7. Drywall must be stored in a manner that:
  - Maintains a clear path of egress.
  - Distributes the weight of the drywall among structural support.
  - Keeps the drywall dry.

### Electrical

1. The following minimum clearances must be maintained from energized power lines. This clearance includes the equipment as well as any material:

|                        |         |
|------------------------|---------|
| Cranes                 | 20 feet |
| Excavators             | 10 feet |
| Aerial Work Platforms  | 10 feet |
| Scaffolds              | 10 feet |
| Metal/Aluminum Ladders | 20 feet |

If these clearances cannot be met or will be difficult to maintain, the project team must take additional steps to have the powerlines protected, removed, or de-energized by the utility provider. Please note the clearance requirements listed above are the minimum requirements for uninsulated lines and federal and state requirements must be reviewed for full compliance. The clearance distance may be reduced with the installation of insulating barriers based on the design of the barrier and the direction of the installing contractor (i.e. DTE).

2. Temporary power must be designed with the intent to allow single extension cords use, not linked, and out of the way of construction traffic.
3. All underground temporary lighting must be marked for the duration of construction for future coordination and hazard awareness.
4. All temporary receptacles must be installed so that they are clear of all walkways, not allowing stress on wires, and without any exposed knockouts.
5. All construction lighting must be protected by guards or consist of shatterproof LED bulbs and kept clear of any walkway.
6. All temporary outlets must be equipped with GFCIs.
7. Cords and tools must be inspected daily. If the insulation or casing of the cord is damaged, or the ground prong is missing, the cord may be removed from use by project supervision.
8. All cords must be 3-prong 12-gauge heavy-duty cords and be protected from indoor/ outdoor traffic.
9. All relocatable power taps (RPTs), also known as “power strips” or “surge protectors”, must be rated for construction sites and installed and used per the manufacturer and nationally recognized testing laboratory’s instructions. All non-construction rated RPTs found on site must be removed immediately.
10. Construction equipment, including extension cords, cannot be plugged into permanent power without a GFCI.
11. Stairwells, corridors, and work areas shall be properly illuminated with either temporary or permanent lighting.
12. Portable generators must be provided with ground fault circuit interrupters.

### Elevator Installation

1. Elevator openings at ground level require guardrails, snow fence, or three-quarter inch plywood across the opening even if the pit has a drop less than six (6) feet.
2. Guardrails must be adequately secured per MIOSHA standards to elevator openings with a fall hazard of six (6) feet or greater.
3. Elevator pits are considered confined spaces and signage must be placed at their points of access.
4. Employees working in or near an open or unprotected elevator shaft six (6) feet or greater are required to wear a personal fall arrest system.
5. All elevator openings must be protected with fall protection that meets MIOSHA requirements in addition to

any other requirement of the elevator contractor.

### Excavation / Trenching and Site Utilities

1. The competent person, per MIOSHA standards, must inspect the excavation:
  - Daily before work activities commence.
  - After heavy rainfall.
  - At depths greater than four (4) feet for oxygen deficiencies or hazardous atmosphere.
  - For failures of protective systems, equipment, and adjacent structures.
2. A Pre-Task Plan must be completed and on file with OCC before any excavating can begin.
3. Miss DIG 811 must be contacted before starting any excavating with **the proposed excavation spray painted in white for clarity in coordination.**
4. Workers must exercise reasonable care when working near underground utilities. **Hand-digging shall be employed** in such circumstances where utilities are to be exposed, are likely to be exposed, or whose location is unclear.
5. When working in a trench 4 feet or more in-depth, proper sloping, shoring, or other cave-in protection methods shall be utilized.
6. Ladders must be accessible within twenty-five (25) feet for all trenches and excavations exceeding four (4) feet in depth.
7. Material, tools, and spoil piles shall be kept a minimum of two (2) feet away from the edge of an excavation or trench.
8. All open holes, trenches, and excavations shall be barricaded and clearly marked to alert the public and other workers in the area.
9. Excavations and trenches may be confined spaces where air monitoring could be required.
10. All vehicles hauling soil from the site must defer to the site logistics plan for designated routes to be used.
11. During the construction and installation of the elevator, the subcontractor must properly barricade and secure the pit area.

### Fall Protection

1. Fall protection systems are required when exposed to heights of six (6) feet or more. Conventional systems include guardrails, personal fall arrest systems (PFAS), and safety nets. When elimination of the hazard is not possible, guardrails must be the first alternative to be considered.
2. Most common types of PFAS and OCC's preferred applications:
  - Self-Retracting Lanyards (SRLs)**  
Preferred means of fall protection for most applications
  - Positioning Lanyards**  
Preferred means of fall protection for flat roofs and mobile elevated working Platforms.
  - Shock-Absorbing Lanyards**  
Precautions must be taken to ensure the expanded system allows proper clearance for workers from contacting below surfaces.
  - Rope Lifelines and Rope**  
Best used for suspension scaffolding and when the above options are not feasible for maintaining a traveling anchor point for mobility. Ensure rope grabs are always adjusted to be as close to the anchor point as possible with minimum slack.
3. All lanyards/lifelines must be protected from sharp edges and corners to prevent chafing and wear.
4. All fall arrest systems must be rigged to prevent a free fall of more than six (6) feet.
5. Workers must only use full-body harnesses of the proper size and that are secured per manufacturer recommendations. **Body belts are not permitted.**
6. All systems must be inspected, constructed, and installed per applicable ANSI, ASTM, MIOSHA, and manufacturer's requirements.

7. Ensure a thorough inspection is completed of all fall protection components before use **DAILY**.
8. **A Pre-Task Plan is required before conducting ALL work on a roof that does not have a parapet perimeter of at least 39 inches.**
9. All holes and floor openings greater than two (2) inches in depth or diameter are required to be properly barricaded or covered, secured from displacement, and visibly marked with high visibility paint as a "hole".
10. Contractors are required to maintain all established fall protection systems, and if a fall hazard is created in their course of work, it must be corrected or resecured to maintain complete site safety.
11. If an employer can demonstrate conventional fall protection methods are infeasible or present a greater hazard, a fall protection plan may be implemented. The fall protection plan must comply with MIOSHA standards and include the following:
  - Site-specific requirements/unique circumstances.
  - Prepared by a qualified person.
  - Supervised by a competent person.
  - Explain why conventional methods are infeasible.
  - Discuss the safety measures that will be taken to reduce or eliminate the fall hazard of the workers.
  - Describe all controlled access zones.
  - Require training for all employees.
  - Signed approval from OCC's Safety Manager.
12. Please refer to the site-specific fall prevention plan for specifics regarding the site requirements and rescue plan.

#### *Forklift / Rough Terrain Forklift/Telehandler*

1. A Pre-Task Plan is required to be completed before use of forklifts and rough terrain forklifts.
2. Operated by trained and authorized personnel only. Employees must have operator's certification readily available.
3. All equipment must be inspected daily. The inspection checklist must be readily available if requested.
4. Equipment must be well maintained, including legible safety decals and the operator's manual stored on equipment.
5. Forklifts should only be operated in accordance with the manufacturer's manual.
6. Forklifts may **ONLY** be used to provide a safe work platform for people if the workbox is engineer-designed to do so, is approved by the manufacturer, and a PFAS is utilized and properly secured.
7. Operators must carry loads as low to the ground as possible when in transport.
8. Spotters must be utilized when visibility is impaired.
9. Areas beneath the elevated loads must be barricaded off and doors that exit to area must be blocked or locked with warning signage to prevent dropped object hazards.

#### *Heavy Equipment*

1. Pre-Task Plans must be completed and on file with OCC for applicable equipment before use on site.
2. Only trained operators shall be allowed to operate heavy equipment. Operators shall provide a copy of their license to the Superintendent before starting work and should have it available upon request anytime thereafter. Personnel other than the operator are not allowed on equipment unless the piece of equipment is specifically designed for passengers or as dictated by MIOSHA standards.
3. All operating equipment shall be equipped with rollover guards per MIOSHA standards.
4. Operating equipment shall be equipped with audible notifications, strobes, and/or beacons per manufacturer requirements.
5. A spotter is required whenever a vehicle has a restricted view while operating on-site.
6. Properly set up barricades or traffic control zones when operating equipment near public roadways. When construction activities are at a peak level, the use of a spotter/traffic controller is permitted to help direct

and control traffic.

7. Subcontractors are required to conduct daily inspections of all equipment before use.
8. Employees assigned to traffic control duties must wear high-visibility clothing per MIOSHA standards.

### **Working Around Heavy Equipment**

1. Do not enter barricaded areas unless trained and authorized to do so and utilizing proper PPE. Barricaded areas include, but are not limited to:
  - a. Caution or Danger tape of any color
  - b. Guardrails
  - c. Rope or Cables
  - d. Visual markings (including signage and paint)
2. When working around operating equipment, stay in sight of the operator. If you can't see them, they can't see you.
3. Be aware of your surroundings. Be alert to moving equipment (cranes, excavators, bulldozers, aerial work platforms, hi-lo, bobcats, etc.). Do not walk or work under any type of suspended loads.

### **Hot Work / Welding**

1. A hot work permit is required for any operation involving open flames or producing heat and/or sparks. This includes, but is not limited to burning, welding, cutting, brazing, soldering, and grinding.
2. All PPE must be worn to MIOSHA and OCC requirements.
3. Hot work equipment must be inspected before use.
4. A multi-class (ABC) portable fire extinguisher of adequate size and fully charged must be immediately available and supplied by the subcontractor.
  - a. This fire extinguisher cannot be an OCC fire prevention extinguisher moved from its designated location.
5. Flammable and ignitable materials and debris must be moved at least 35 feet away or protected with fire-resistant materials.
6. Welding hoses and cords must be controlled and out of the way.
7. All wall and floor openings must be appropriately covered.
8. The area must be barricaded around and below operation as needed.
9. A spotter and fire watch must be utilized as applicable.

### **Housekeeping**

1. Site clean-up is required daily.
2. Subcontractors must set aside time every Friday for a weekly site cleaning.
3. The throwing of trash, tools, material, etc. from windows, roofs, work platforms, etc. is prohibited due to the risk of injury to workers below.
4. Subcontractors must properly store and secure all work materials and equipment.
5. Report all chemical and oil spills, and any suspected hazardous materials to OCC supervision immediately.
6. Stairwells, corridors and work areas shall be properly illuminated with either temporary or permanent lighting.
7. Subcontractors must maintain a means of egress throughout all spaces of the project building(s).

### Personal Protective Equipment (PPE)

1. All personal protective equipment shall be provided by subcontractors or employees before the start of each job. OCC is not responsible for providing PPE to subcontractors.
2. Personal protective equipment including hard hats, safety glasses, work boots, and high-visibility shirts must be worn when on site.
3. Proper work attire consists of long pants (no shorts); a shirt with a minimum of 4-inch sleeves, and proper hard-soled work boots.
4. Fall protection is required for all trades when working at heights of 6 feet or more.
5. Protective gloves or clothing shall be worn when required to protect against a hazard.
6. A face shield or safety goggles are required when cutting, grinding, welding, or power washing.
7. Hearing protection is required when working in areas where noise levels exceed 85 decibels, where normal conversation cannot be conducted, or when the area is posted as a noise hazard.
8. Dust masks or respirators shall be worn in all dusty environments. Pulmonary function testing, fit tests, and written respiratory programs are required for respirator use.
9. All personal protective equipment must be inspected daily per MIOSHA standards.

### Ladders

1. Only ladders rated Type 1 heavy-duty with a weight limit of 250 pounds or greater are allowed on-site.
2. If work is to be completed on a ladder near or over an opening or hole, and it is deemed infeasible to use another means by the Superintendent, the worker must wear a body harness and be tied off.
3. If work is to be completed on a ladder above the height of nearby guardrails, the worker must wear a body harness and be tied off or additional guardrails must be installed at nineteen (19) inch intervals.
4. All ladders used to access an above landing must extend a minimum of three (3) feet above the landing and be secured. If the ladder cannot be secured, it must be held at the bottom by another worker.
5. Keep ladder bases and rungs clear from debris, hoses, wire, materials, etc.
6. Use the "four and one" rule when positioning a ladder – one (1) foot of base for every four (4) feet of height.
7. The spreader assembly of a Step/A-frame ladder must be fully extended and locked into place when in use. These ladders cannot be used in a closed position unless they are designed by the manufacturer to do so. Placement must be on stable surfaces.
8. Workers must not straddle or stand on the top two (2) rungs of a ladder and must work facing the ladder whenever possible.
9. Ladders shall be used only for the purpose for which they were designed.

### Material and Glass Handling

1. Do not perform work that you are physically or mentally unable to perform.
2. Lift correctly - with legs, not back. If the load is too heavy, GET HELP. Do stretching exercises.
3. **Approximately twenty percent of all construction-related injuries result from lifting materials.**
4. If material is to be delivered through an upper-level wall opening or window, employees are required to:
  - Have the operator's license to use the equipment.
  - Inspect equipment daily.
  - Fall protection to accept delivery of material.
  - The room accepting material must warn of the fall hazard and all parties inside must be protected from the hazard.

### Glass and Mirrors

1. Appropriate gloves and eye protection should be worn when handling glass or mirrors.
2. Glass containers and bottles are not allowed on the job sites.
3. Glass lights must be guarded to prevent accidental breakage.
4. Storage location of glass materials and mirrors must be established by the Site Superintendent.



- Consideration must be made for jobsite traffic and additional protections such as padding and cardboard.
5. Before moving mirrors, a large X shape must be taped across the surface to help prevent shattering.
  6. Whenever possible, transporting of glass and mirrors should be done with use of a cart, rack, straps, suction devices, or any other mechanical means.
  7. Proper carrying technique should be followed when transporting glass or mirrors manually:
    - Carry to your side with two hands.
    - Never carry under your arm or above head.
    - Always use two people to move larger sheets.
    - Replace worn safety equipment and straps prior to use.
  8. Glass and mirrors, broken or whole, shall not be thrown into open receptacles as flying glass can result from impact.
  9. Never break glass into smaller pieces with hand or shoe.
  10. Cleaning of broken glass:
    - Never collect broken glass or mirrors with bare hands.
    - Use a dustpan and brush, cardboard, or heavy paper to pick up breakage.
    - Smaller particles should be picked up with several pieces of wet paper towel or by wet vacuum.
      - Cloth napkins, cloth towels, sponges, etc. should not be used as they can harbor glass particles.
    - Until the breakage can be cleaned up, barricades and/or warning signs should be posted in the area to alert others.
    - Ensure that broken glass is completely submerged in the receptacle so that no sharp edges are exposed.

#### Painter / Primer

1. The subcontractor must submit all required SDS.
2. The subcontractor must provide a written respiratory program.
3. Employees must wear appropriate work attire and PPE, including hard hats, work boots, high-visibility clothing, and face masks/respirators when spraying paint.
4. While painting/priming, the subcontractor must make sure the work area is properly ventilated.
5. The subcontractor is permitted to set up a restricted work zone when spraying paint.
6. Properly store all paint material and dispose of empty paint buckets daily.
7. Employees must use ladders, scaffolding, or lifts to reach difficult areas.

#### Powered Tools and Equipment Use

1. Only trained operators shall be allowed to operate the equipment. Operators must have a copy of their license to operate available upon request at any time.
2. Proper instruction in the use of power tools is required.
3. Do not remove, displace, damage, or destroy any safety device or safeguard furnished or provided for use on or with the tool, nor interfere with the use thereof.
4. Gasoline-powered equipment is NOT to be operated in any enclosed buildings without proper ventilation.
5. It is the subcontractor's responsibility to follow all required manufacturer, ANSI, and MIOSHA guidelines when servicing, repairing, adjusting, fueling, or lubricating tools or equipment.
6. Any damaged equipment (all tools, chains, straps, cables, etc.) must not be used. Report any damaged equipment or tools to your supervisor so they can be tagged and taken out of service.

#### Roofing Work

1. The subcontractor must complete a written Pre-Task Plan with the superintendent before the start of work.
2. Fall protection systems are required for ALL trades when working on the roof. Fall protection options include:

- Guardrail systems
  - Personal fall arrest systems
  - Safety net systems
  - Positioning device systems
  - Warning line systems (low slope or no slope roofs only)
  - Or a combination of:
    - Warning line system AND guardrail system
    - Warning line system AND safety net system
    - Warning line system AND personal fall arrest system
    - Warning line system AND safety monitoring system
      - A safety monitoring system can only be utilized if no other fall protection method is feasible or presents a greater hazard. This method must comply with MIOSHA standard requirements.
3. If utilized, warning Line systems must be erected no less than six (6) feet from the roof edge for roofers, fifteen (15) feet for all other trades, and meet all other MIOSHA requirements.
  4. Employees are restricted from throwing material from the roof that will land outside of a designated drop zone. With the approval of the Superintendent, a subcontractor may establish a drop zone, which requires a barricade and a spotter.
  5. Employees working on roofs must wear appropriate footwear that provides good traction.
  6. Working surfaces must be free of tripping hazards (tools, cords, etc.) and must be clean to prevent material from falling below.
  7. Employees must have proper and safe access to the roofing surface. The use of any temporary ladder must be constructed per MIOSHA standards, meet OCC requirements, and be properly secured to prevent movement.
  8. Employees should refrain from working on the roof during inclement weather conditions.

### Scaffolding and Stilts:

#### **Ground Supported**

1. A Pre-Task Plan is required before scaffolding with a working platform of six (6) feet or greater can be erected.
2. Fall Protection is required for all workers during the erecting, dismantling, and use of equipment whenever the worker is exposed to a fall of six (6) feet or greater **UNLESS** a Competent Person can provide reasons as to why this is not feasible or how this may create a greater hazard.
3. All scaffolds must be erected and inspected daily by a competent person per MIOSHA standards. An accompanying inspection tag or red tag must be visible on all scaffolding.
4. All scaffolding with a working platform height of 6 feet or greater must have guardrails installed or an appropriate fall protection system.
5. If scaffolding is to exceed four (4) times its minimum base dimension, the scaffold must be tied into the structure.
6. Boxes, ladders, etc. may not be used on scaffolding to gain additional height. Nor can guardrails be climbed.
7. Proper means must be utilized to access the scaffolding. Climbing the bracing is not acceptable unless the system has a built-in ladder for that purpose.
8. All working and walking levels must be fully planked and not overloaded.
9. Planks must be scaffold-grade lumber not less than 2x10's. Cracks shall not penetrate more than twelve (12) inches.
10. The footing or anchorage for scaffolds must be sound, rigid, and capable of carrying the maximum intended load without settling or displacement.
11. Plywood work platforms must meet MIOSHA Part 12 requirements.
12. Work on scaffolding is prohibited during storms or high winds.

13. Base plates are required for scaffold use on stairs.

### ***Mobile Scaffold***

1. A Pre-Task Plan is required before scaffolding with a working platform of six (6) feet or greater can be erected.
2. Fall Protection is required for all workers during the erecting, dismantling, and use of equipment whenever the worker is exposed to a fall of six (6) feet or greater **UNLESS** a Competent Person can provide reasons as to why this is not feasible or how this may create a greater hazard.
3. All scaffolds must be inspected daily by a competent person per MIOSHA standards. An accompanying inspection tag or red tag must be visible on all scaffolding.
4. All scaffolding with a working platform height of 6 feet or greater must have guardrails installed or an appropriate fall protection system.
5. **A horizontal diagonal brace is required at the level closest to the casters to prevent racking.** If this brace is not provided, this level must be fully planked as an alternative.
6. All working and walking levels must be fully planked and not overloaded.
7. Hook-on manufactured work platforms must be secured to the bearer.
8. **Caster scaffold wheels must be locked when in use.** Riding of mobile scaffolding is prohibited.
9. Base plates are required for scaffold use on stairs.
10. Boxes, ladders, etc. may not be used on scaffolding to gain additional height. Nor can guardrails be climbed.

### ***Hydro Mobile/Mast Climbing Scaffold***

1. A Pre-Task Plan is required before scaffolding can be erected.
2. Must be erected and inspected daily by a competent person per MIOSHA standards. An accompanying inspection tag or red tag must be visible.
3. A minimum distance of ten (10) feet must be maintained between the work platform and any material and electrical power lines.
4. Fall protection is required for all workers during the erecting, dismantling, and use of equipment whenever the worker is exposed to a fall of six (6) feet or greater, **including along the inner perimeter.**
5. Fall protection is required when climbing or descending the mast when the height of the lift is between thirty (30) feet and sixty-nine (69) feet.
6. Mast climbing is prohibited when the lift is greater than sixty-nine (69) feet. Alternative methods of ingress and egress will be required. The use of alternative equipment must be MIOSHA compliant. Options include, but are not limited to a rapid mast climber, a transport platform system, or a conventional scaffold stair system.
7. Barricades must be erected around the base of the platform for dropped object protection.

### ***Pump Jack Scaffold***

1. A Pre-Task Plan is required before scaffolding can be erected.
2. Must be erected and inspected daily by a competent person per MIOSHA standards. An accompanying inspection tag or red tag must be visible.
3. Fall protection is required for all workers during erecting, dismantling, and use of equipment whenever the worker is exposed to a fall of six (6) feet or greater, **including side guardrails.**
4. Brackets, braces, and accessories must be fabricated from metal plates and angles.
5. Each pump jack bracket must have two positive gripping mechanisms to prevent any failure or slippage.
6. Poles must always be secured to the structure by rigid triangular bracing or equivalent at the bottom, top, and other points as necessary.
7. Work benches cannot be used as scaffold platforms.

8. Dropped object prevention must be installed around the work platform.

### ***Ladder Jack Scaffold***

1. A Pre-Task Plan is required before scaffolding can be erected if greater than six (6) feet.
2. Must be erected and inspected daily by a competent person per MIOSHA standards. An accompanying inspection tag or red tag must be visible.
3. Fall protection is required for all workers when the working platform is six (6) feet or greater.
4. Platforms must not exceed a height of twenty (20) feet.
5. All ladders used to support ladder jack scaffolds must meet MIOSHA requirements and used within the designed intent of the manufacturer.
6. Ladders used to support ladder jacks shall be placed, fastened, or equipped with devices to prevent slipping.

### ***Step, Platform, and Trestle Ladder Scaffolds***

1. A Pre-Task Plan is required before scaffolding can be erected if greater than six (6) feet.
2. Fall protection is required for all workers when the working platform is six (6) feet or greater.
3. All ladders used to support ladder jack scaffolds must meet MIOSHA requirements and used within the designed intent of the manufacturer.
4. Scaffold platform must not be placed any higher than the second highest rung or step of the ladder.
5. Scaffold platform must meet MIOSHA scaffold planking requirements and be equipped with hooks or cleats to prevent accidental displacement.
6. Ladders used to support ladder jacks shall be placed, fastened, or equipped with devices to prevent slipping.
7. Scaffolds cannot be bridged to one another.

### ***Suspended Scaffold***

8. A Pre-Task Plan is required before scaffolding can be erected.
9. Must be erected and inspected daily by a competent person per MIOSHA standards. An accompanying inspection tag or red tag must be visible.
10. Fall Protection is required for all workers during the erecting and dismantling of equipment on exposed roofs/floors.
11. All supporting devices must be capable of supporting their weight and at least four (4) times the maximum intended load applied.
12. Counterweights used with outrigger beams must be secured to the beam to prevent accidental displacement.
13. Install tiebacks perpendicular to the face of the building and secure, without slack, to a structurally sound portion of the structure. In the event tiebacks cannot be installed at right angles, two (2) tiebacks at opposing angles must be used to prevent movement.
14. Rig and use hoisting machines directly under their suspension points.
15. Proper means must be utilized to access the scaffolding. Barricades and warning signage will be installed to warn onsite personnel of any fall hazards at the point of access.
16. A fire extinguisher must be present on the platform during use.

### ***Stilts***

1. Signage must be erected to warn others of areas where stilts are in use.
2. Surfaces on which stilts are used must be flat and free of pits, holes, and obstructions, such as debris, as well as other tripping and falling hazards.
3. Stilts shall be properly maintained. Any alteration of the original equipment must be approved by the manufacturer.

### Site Work

1. Subcontractors must wear a hard hat, safety glasses, work boots, and high visibility clothing at all times in addition to any other appropriate PPE.
2. Employees must use the 3-point mounting and dismounting technique off heavy equipment. **Jumping off is not permissible.**
3. Employees are never to be located beneath an overhead or suspended load.
4. MISS DIG 811 must be called before any excavating may occur on site.
  - a. See Excavation/Trenching and Site Utilities for additional requirements.

### Steel Erection

1. The subcontractor must complete a safety Pre-Task Plan before all overhead hoisting activities take place.
2. The subcontractor must provide all documentation and follow all crane safety guidelines noted in this safety plan.
3. Hot work permits must be acquired daily before any operation involving open flame or producing heat and/or sparks.
5. The area of erection must be securely barricaded. If necessary, a controlled access zone may be permitted.
6. All steel erectors must wear appropriate PPE, including fall protection at heights greater than six (6) feet and a welding mask when welding.
7. Fall protection is required for all employees working at heights greater than six (6) feet above ground unless deemed infeasible. Ladders, scaffolding, and aerial work platforms must be considered as viable options.
  - a. Aerial work platforms must be protected from sudden drop offs, holes, and floor openings.
8. Metal pan stairs must be barricaded from use once installed until all pans are fully filled and level with a rigid material.

### Truss and Deck Framing

1. The installation crew must complete the "Reducing Falls During Roof Truss Installation" toolbox talk before commencing work.
2. Employees are required to wear appropriate PPE, including fall protection at heights greater than six (6) feet.
3. The subcontractor must provide all documentation and follow all crane safety guidelines noted in this safety plan.
4. Workers are not allowed to walk among the trusses/joists without fall protection.
5. **Contractors must use one of the following methods to set trusses/joists above six (6) feet:**
  - Mobile scaffolding
  - Personal fall arrest system
  - Aerial Work Platform
  - Ladder
6. All walkways and working surfaces must be clear of debris to prevent tripping hazards.
9. Contractors must establish a controlled access zone to prevent other contractors from entering the work area, if applicable.
10. Trusses/Joists must be adequately braced to prevent falling or tipping.
11. Control lines for leading edge work must be flagged with tension at least six (6) feet back from the edge.

### Window Installation

1. All window openings require a guardrail if the windowsill measures a height below thirty-nine (39) inches and a width greater than eighteen (18) inches.
2. When installing windows on the upper floors, the area below (ground level) must be properly barricaded to protect personnel below from potential dropped objects.
3. Employees are required to wear a personal fall arrest system when installing windows on the upper floors if a fall hazard exists.

4. If at any point during window installation a fall hazard is created or exposed, the installation crew must wear a personal fall arrest system.
5. Any created or exposed hazards must never be unattended for any amount of time unless properly barricaded in addition to danger signage.
6. If using any lifting devices (rough terrain, aerial, etc.), employees must:
  - Have an operator's license to use the equipment.
  - Inspect equipment daily.
  - Wear a personal fall arrest system to accept delivery of material if a fall hazard exists.
    - The room accepting material must warn of fall hazards and all parties inside must be protected from the hazard.