

STANDARD OPERATING PROCEDURE

Site Safety Plan



SOP Issue: **What is the Site Safety Plan**

File Location: <S:\OPERATIONS\7 Field Operations\7A STANDARDS\Site Safety Plan.docx>

SOP Originator: **Kevin Storch** *Created date:* **7/17/2015**

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Site Safety Plan

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1. Company Safety Policy



COMPANY SAFETY POLICY

Century Holdings is committed to a strong safety program that protects its staff and the public from accidents and injury. Employees at every level, including management, are responsible and accountable for the company's overall safety initiatives. Complete and active participation by all employees is necessary for the safety excellence the company expects. Management supports the coordination and cooperation of all workers concerning safety on the jobsite. Management encourages all employees to participate in the program and provides proper equipment, training, and procedures. Employees are responsible for following all procedures, working safely, and continuously improving safety measures.

An accident-free workplace is our goal. Through continuous safety and loss control efforts we can accomplish this.

A handwritten signature in black ink, appearing to read 'P. W. G. L. A. S.', is written over a horizontal line.

December 12, 2022

CHIEF OPERATING OFFICER

Please note the safety information in this policy does not take precedence over applicable government regulation with which all employees should be familiar.

2. Drug Free Workplace Policy

Purpose and Goal

Southern Staircase is committed to protecting the safety, health and well-being of all employees and other individuals in our workplace. We recognize that drug and alcohol abuse can threaten our goals. Therefore, we have established a drug-free workplace program that balances our respect for individuals with the need to maintain a drug and alcohol-free environment.

This policy recognizes that employee involvement with drugs or alcohol can be very disruptive, can adversely affect the quality of work and performance of employees, can pose serious health risks to users and others, and can have a negative impact on productivity and morale.

This organization has no intention of interfering with the private lives of its employees unless involvement with alcohol and other drugs off the job affects job performance or public safety.

As a condition of employment, the Company requires that employees adhere to a strict policy regarding the use and possession of drugs and alcohol. The Company encourages employees to voluntarily seek help with drug and alcohol problems.

Covered Workers

Any individual who conducts business for the Company, is applying for a position or is conducting business on our property is covered by our drug-free workplace policy. Our policy includes, but is not limited to managers, supervisors, full-time employees, part-time employees, off-site employees and applicants.

Applicability

Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for the Company. Therefore, this policy applies during all working hours, whenever conducting business, while on call, paid standby, and while on Company property.

Prohibited Behavior

It is a violation of our drug-free workplace policy for any employee:

- To use, possess, sell, trade, offer for sale, or offer to buy illegal drugs or otherwise engage in the illegal use of drugs on or off the job.
- To report to work under the influence of or while possessing in his or her body, blood or urine illegal drugs in any detectable amount.
- To report to work under the influence of or impaired by alcohol.

If the use of a legally prescribed medication could compromise the safety of the employee, fellow employees or the public, it is the employee's responsibility to use appropriate personnel procedures (e.g., call in sick, use leave, request change of duty, notify supervisor) to avoid unsafe workplace practices.

Notification of Convictions

Any employee who is convicted of a criminal drug violation in the workplace must notify the Company in writing within five calendar days of the conviction. The Company will take appropriate action within thirty days of notification.

Searches

Entering the Company's property constitutes consent to searches and inspections. If an individual is suspected of violating the drug-free workplace policy, he may be asked to submit to a search or inspection at any time. Searches can be conducted of any personal belongings brought onto company property, including but not limited to pockets and clothing, lockers, wallets, purses, briefcases, lunchboxes, desks, work stations, vehicles and equipment.

Drug Testing

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to DHHS/SAMHSA guidelines where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; review by a Medical Review Officer, and a documented chain of custody. DHHS/SAMHSA guidelines also include the opportunity for employees who test positive to contest the result to the Company in writing within five working days after the Company contacts the employee or job applicant and shows him the written positive test results as it was received from the laboratory to provide a legitimate medical explanation, such as a physician's prescription.

As a condition of employment, each employee will be required to participate in the following types of testing: pre-employment (drugs only), post-accident, reasonable suspicion and post rehabilitation testing. The substances that will be tested for are amphetamines, cannabinoids, cocaine, opiates, phencyclidine (PCP) and

alcohol. Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine. Testing for the presence of alcohol will be conducted by analysis of breath.

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3. Safety Operations Manual

Manual is available upon request (SOP #1-38). This is a very large file.

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4. Hazard Communications / GHS Program

GUIDELINE PREFACE (SOP 5)

This purpose of this program is to ensure that all Southern Staircase employees are informed of the hazards of chemicals with which they work to reduce the risk and the incidence of chemical source injuries and illness on the job.

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PURPOSE (SOP 5-A)

1. Hazardous Communication (HazCom/GHS) provides for three vital elements, which when taken together, form the basis for a comprehensive Hazard Communication Program, also known as the Global Harmonization System (GHS). These elements are:
 - a. The labeling of hazardous chemicals in our stores. The label provides an immediate warning of hazards as a visual reminder of information provided on Safety Data Sheets (SDS).
 - b. The maintenance of SDS; maintained in an alphabetical listing.
 - c. Southern Staircase employees will be trained in the use of the HazCom/GHS program as well as the hazards of chemicals used in their working areas. Training will include methods to communicate this program to the Employees. Training will cover the proper use of personal protective equipment.

MANAGEMENT / EMPLOYEE RESPONSIBILITIES (SOP 5-B)

1. The Safety Director is the program coordinator who has overall responsibility for the program. The Safety Director will review and update the program, as necessary. Copies of this written program may be obtained electronically from the corporate network server.
2. All employees, or their designated representatives, can obtain further information on this written program, applicable SDS, and chemical information lists from the Safety Director, and from the appropriate electronic server.
3. If after reading this program, you find that improvements can be made, please contact the Safety Director. We encourage all suggestions because we are committed to the success of our written HazCom/GHS program.
4. Each employee bringing chemicals onsite must provide the Safety Director with the appropriate hazard information on these substances, including the SDS, the labels used and the precautionary measures to be taken in working with these chemicals, as described in the appropriate sections contained herein.

HAZARD DETERMINATION (SOP 5-C)

1. Our chemical inventory is a list of hazardous chemicals known to be present in our typical facility, mainly in the production and/or warehouse areas. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations.
2. The inventory will be updated as necessary, whenever it is determined that a contractor has introduced a new chemical not on this current list of chemicals.
3. The Safety Director will update the inventory as necessary.
4. The chemical inventory list is located at each of the store offices and on the appropriate electronic server, where it is accessible during work hours.
5. Southern Staircase does not manufacture any chemicals and, therefore, does not make any hazard determinations.

CONTAINER LABELING (SOP 5-D)

1. The Safety Director in charge of receiving at each facility shall ensure that labels on containers of hazardous chemicals entering the workplace from outside vendors are not missing or defaced and are in compliance with OSHA standard 29 CFR 1910.1200 F.
2. All hazardous chemical containers shall be labeled with the identification of contents and with proper warnings.
3. Pictograms are required on all labels to acquaint foreign nationals and/or workers who can't read or write.
4. Labels must contain a signal word to identify the nature of the hazard:
 - a. **Danger** – for more severe hazards
 - b. **Warning** - for less severe hazards
5. Any SDS received with these incoming shipments shall be immediately forwarded to the Safety Director for insertion in the HazCom / GHS program binders.
6. The Corporate Safety Director (Rigo Giron) shall be immediately notified of any major change in the hazard information contained on SDS from vendors.
7. Rigo Giron is responsible for ensuring that all hazardous chemicals are properly labeled, as necessary.
8. The labeling system that should be found on our sites are:
 - (a) The original label as provided by the manufacturer, OR
 - (b) The employee is required to clearly identify the contents and the hazards associated with those chemicals. The Safety Director will notify the employee of non-compliance, during any regular audit.
 - (c) If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container.

SAFETY DATA SHEETS (SDS) (SOP 5-E)

1. The Safety Director shall be responsible for obtaining and maintaining SDS for all materials received.
2. The SDS shall include those for Southern Staircase products, paints, thinners, catalysts, concentrates, raw materials, and maintenance supplies, if applicable.
3. When it is learned that a new chemical has been introduced by one of our employees or suppliers, the Safety Director shall ensure that the SDS can be procured.
4. A hard copy of the safety data sheets are kept in main isle locations in all our facilities.
5. The procedures to obtain access or copies of SDS from Southern Staircase:
 - (a) Employees can obtain access to the SDS by requesting permission from the Safety Director, who can access them using the appropriate electronic server or making copies from appropriate sources

- (b) Unless extraneous circumstances occur or the Safety Director deems a more formal process is required (i.e. written request), the employee will gather and provide copies of the SDS from the HazCom/GHS manual in the main office.
 - (c) Providing the original SDS in the manual is prohibited.
6. The procedures followed to obtain copies of SDS from employee, i.e. if the SDS is found to be not on the Southern Staircase Chemical Inventory:
- (a) Manger will notify the employee that a copy of the product SDS is needed.
 - (b) The employee will notify the Safety Director of Non-compliance.
 - (c) Upon receipt, the employee will file the SDS copy into the Southern Staircase HazCom/GHS Manual under the appropriate section, behind the last SDS.
 - (d) The Employee will then record the SDS in the Chemical Inventory List.
 - (e) Annually, the Safety Director will gather all entries (copies) and update the master inventory list maintained at the main office or computer server, if necessary. The lists will then be updated to ensure all store compliance.
7. We do not generate SDS. No alternatives to SDS are used in this workplace.

INFORMATION AND TRAINING (SOP 5-F)

1. Any employee who works with or is potentially "exposed" to hazardous chemicals will receive initial training and any necessary retraining on HazCom/GHS and the safe use of chemicals by the Safety Director.
2. All employees must be trained on the new label elements and SDS format by December 1, 2013.
3. Employees will be instructed on the following items:
 - a. Requirements for labels on containers of hazardous chemicals and how they coordinate with SDS, including:
 - i. Pictograms
 - ii. Signal words to identify the nature of the hazard
 1. **Danger** – for more severe hazards
 2. **Warning** - for less severe hazards
 - b. How to read and interpret information contained on SDS (SDS Sample SOP 8-Appendix D).
 - c. Chemical hazards presented by hazardous materials present in the employee's work area.
 - d. Measures which employees can or must take to protect themselves from hazardous chemicals, such as use of protective safety equipment.
 - e. Specific procedures or controls that have been implemented by the company to protect employees from hazardous chemicals.
 - f. The contact for questions and answers about hazardous chemicals and SDS.
4. Rosters are signed by employees upon completion of their training and are kept by the Safety Director.
5. The Safety Director can provide training as needed to employees.

NOTICE OF UN-RECEIVED SAFETY DATA SHEETS (SOP 5-G)

A chemical/product/material was observed on our worksite that has not been found on our chemical inventory list. The OSHA Hazard Communication Standard requires us to maintain and distribute Safety Data Sheets (SDS) for all chemical substances and hazardous materials found on our worksites. This NOTICE is to formally advise you that an SDS has not been supplied.

In order for our company and yours to be in compliance with this Standard you must provide us with the Product SDS. Your prompt attention to this matter is appreciated

Product Name: _____

Vendor Name: _____

Product Observed at SITE & DATE: _____

Subcontractor Representative notified: _____

Maintain this record and copy of attached in SDS binder for this project.

Chemical Inventory

SDS - Table of Contents










Doc Location: S:\Safety Docs\08 Safety Programs\03 Hazard Communication\SDS Book Table of Contents 2022.xlsx

Section	Category	Item:	Manufacturer:
1	Adhesives / Loctite	Fastbond Contact Adhesive 30-NF, Neutral	3M
1	Adhesives / Loctite	Heavy Duty 20 Spray Adhesive	3M
1	Adhesives / Loctite	Hi-Strength 90 Cylinder Spray Adhesive, Clear	3M
1	Adhesives / Loctite	Scotch-Weld Hot Melt Adhesive	3M
1	Adhesives / Loctite	Great Stuff	Dow
1	Adhesives / Loctite	Loctite 326	Henkel
1	Adhesives / Loctite	Loctite 7075 Activator	Loctite
1	Adhesives / Loctite	LN-609 Panel & Foam	PPG
2	Cleaning Supplies	GOJO Hand Cleaner	GOJO
2	Cleaning Supplies	Poly Finish 2102 / Polymer Emulsion	PRO CHEM, Inc
2	Cleaning Supplies	Simple Green All-Purpose Cleaner	Simple Green
2	Cleaning Supplies	1907/2006 Reach Spray Cleaner	Welcon
3	Epoxy / Resins	105 Epoxy Resin	West System Inc.
3	Epoxy / Resins	206 Slow Hardener	West System Inc.
4	Gasses (Metal Shop)	Acetylene	Airgas
4	Gasses (Metal Shop)	Argon	Airgas
4	Gasses (Metal Shop)	Non-Flammable Gas Mixture	Airgas
4	Gasses (Metal Shop)	Carbon Dioxide	Airgas
4	Gasses (Metal Shop)	Oxygen	Airgas
4	Gasses (Metal Shop)	415884-Randor	Hobart Brothers Co
4	Gasses (Metal Shop)	Randor 6010	Randor Welding Products
5	Glues	Multibond 1040	Franklin International
5	Glues	Titebond II Premium Wood Glue	Franklin International
5	Glues	Titebond III Premium Wood Glue	Franklin International
5	Glues	Titebond All Weather Subfloor Adhesive	Franklin International
5	Glues	Titebond Cold Press for Veneer	Franklin International
5	Glues	Titebond Instant Bond Activator	Franklin International
5	Glues	Titebond Original Wood Glue	Franklin International
5	Glues	Woodbond 75	Franklin International
5	Glues	NCF Accelerators	Satellite City
5	Glues	NCF Quick	Satellite City
5	Glues	Super T	Satellite City
6	Oils / Lubricants	Castrol GTX 10W-30	BP
6	Oils / Lubricants	Mobil DTE Oil Light	Exxon Mobil
6	Oils / Lubricants	MOBILUX EP 1	Exxon Mobil
6	Oils / Lubricants	MOBILGREASE CM-P	Exxon Mobil
6	Oils / Lubricants	Tap Magic Aluminum Cutting Fluid	The Steco Corporation
6	Oils / Lubricants	WALIT 22-74	ACMOS Chemie KG
6	Oils / Lubricants	WAXIGLIDE Table Lubricant	Michael Weinig Inc
6	Oils / Lubricants	XCEL Universal AFT Type A	XCEL Lubricants
7	Paints / Spray Paints	Kilz 2 Latex	Masterchem Industries
7	Paints / Spray Paints	KRYLON Spray Paint / Aerosols	Krylon Products Group
7	Paints / Spray Paints	RUST-OLEUM Spray Paint / Aerosols	Rust-Oleum Corp
7	Paints / Spray Paints	61003 Multi-Coat Blank Aerosol	SEM
8	Sealant/Filler	Autobody Sealant - Tan	3M
8	Sealant/Filler	Bondo - White Cream Hardener	3M
8	Sealant/Filler	Dynatron Auto Seam Sealer Grey Caulk, 550	3M

8	Sealant/Filler	Weatherproofing Sealant - Black	DOW Corning
8	Sealant/Filler	Alex Plus Acrylic Latex Chaulk + Silicone	DAP Products
8	Sealant/Filler	Dynaflex 230	DAP Products
8	Sealant/Filler	Fast N Final Lightweight Spackling	DAP Products
8	Sealant/Filler	Famowood Wood Filler	Eclectic Products Inc
8	Sealant/Filler	Famowood Wood Filler Solvent	Eclectic Products Inc
8	Sealant/Filler	IRWIN Chalk - White	IRWIN
9	Solvents	Klean-Strip Acetone	WM Barr
9	Solvents	Klean-Strip Denatured Alcohol	WM Barr
9	Solvents	Klean-Strip Odorless Mineral Spirits	WM Barr
9	Solvents	Klean-Strip Lacquer Thinner	WM Barr
10	Wood Finishes	Old English - Scratch Cover	Reckitt Benckiser
10	Wood Finishes	MINWAX Fast-Drying Polyurethane Clear Gloss	MINWAX Co
10	Wood Finishes	MINWAX Indoor / Outdoor Urethane (Aerosol)	MINWAX Co
10	Wood Finishes	MINWAX Prestain Wood Conditioner	MINWAX Co
10	Wood Finishes	SHER-WOOD Fast Dry Vinyl Sealer	Sherwin Williams Co
10	Wood Finishes	PRO-MAR Flat Lacquer Undercoater, White	Sherwin Williams Co
11	Miscellaneous	Falcon Signal Horns	Dupont / Honeywell
11	Miscellaneous	Safety Boosters	HILTI

HCS PICTOGRAMS (SOP 16-1-Appendix B)

HCS Pictograms and Hazards

<p>Health Hazard</p>  <ul style="list-style-type: none"> ■ Carcinogen ■ Mutagenicity ■ Reproductive Toxicity ■ Respiratory Sensitizer ■ Target Organ Toxicity ■ Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> ■ Flammables ■ Pyrophorics ■ Self-Heating ■ Emits Flammable Gas ■ Self-Reactives ■ Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> ■ Irritant (skin and eye) ■ Skin Sensitizer ■ Acute Toxicity ■ Narcotic Effects ■ Respiratory Tract Irritant ■ Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> ■ Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> ■ Skin Corrosion/Burns ■ Eye Damage ■ Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> ■ Explosives ■ Self-Reactives ■ Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> ■ Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ■ Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> ■ Acute Toxicity (fatal or toxic)

5. Lock Out / Tag Out Program

LOCKOUT/TAGOUT PROGRAM

Southern Staircase recognizes that during servicing and/or maintenance of equipment, our employees have the potential to be involved in a serious or fatal accident caused by the unexpected start-up of equipment or the release of stored energy. This policy has been developed to establish procedures for the control of hazardous energy, hereafter called **Lockout/Tagout**. This policy is intended to comply with the requirements of OSHA standard 29 CFR 1910.147, Control of Hazardous Energy (lockout/tagout), and the provisions of OSHA's Electrical Safety-Related Work Practices Standards: 29 CFR 1910.331; 1910.332; 1910.333; 1910.334; and 1910.335.

Important Definitions:

Energy source. Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

Energized. Connected to an energy source or containing residual or stored energy.

Energy isolating device. A mechanical device that physically prevents the transmission or release of energy. This includes: locks; hairpins; tongs; lockable valves; clam shell devices for valves; blank flanges for piping systems; restraining devices to prevent movement of parts; etc.

Lockout device. A device that utilizes a positive means such as a lock to hold an energy isolating device in the safe position and prevent the energizing of a machine or equipment.

Lockout. The placement of a lock on an energy isolating device, in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the device is removed.

Normal production operations. The utilization of a machine or equipment to perform its intended production function.

Servicing and/or maintenance. Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. These activities include: lubrication; cleaning or un-jamming of machines or equipment, and adjusting or tool changes where employees may be exposed to the **unexpected** energization or start-up of the equipment or release of hazardous energy.

Cord and Plug Connected Equipment. Equipment where the only energy source is electrical power provided by a plug in connection.

6. Fall Arrest Program

Fall Protection Plan for Construction

last updated 10/16/2015 11:49

Purpose

Southern Staircase is dedicated to the protection of its employees from on-the-job injuries. All employees have the responsibility to work safely on the job. The purpose of this plan is to provide safety standards specifically designed to cover fall protection for staircase installation jobsites as required by OSHA's fall protection standard for construction under Part 1926, Subpart M.

This standard is intended to prevent employees from falling off, onto or through working levels and to protect employees from falling objects. This policy shall be followed whenever an employee works at heights with fall protection at the job site.

All fall protection systems selected for each application will be installed before an employee is allowed to work in an area that requires protection. The **Field Operations Manager** is the program coordinator and is responsible for its implementation. Copies of the written program may be obtained from **Corporate Office**.

We shall determine if all walking/working surfaces on which we work have the strength and structural integrity to support employees. We are not allowed to work on these surfaces until they have the requisite strength and structural integrity.

General Worksite Policy

1. If any one of the conditions described in a Worksite Assessment is not met for the area or piece of equipment posing a potential fall hazard, then do not perform that work until the condition is met. If you cannot remedy the condition immediately, notify a supervisor of the problem and utilize a different piece of equipment or work in a different area, according to the situation.
2. If the situation calls for use of fall protection devices such as harnesses or lanyards because the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.
3. Only employees trained in such work are expected to perform it.
4. All places of employment, job sites shall be kept clean and orderly and in a sanitary condition.
5. All walking/working surfaces must be kept in a clean and, so far as possible, dry condition. Where wet processes are used, drainage shall be maintained, and false floors, platforms, mats, or other dry standing places should be provided where practicable.

Worksite Assessment and Fall Protection System Selection

This fall protection plan is intended to anticipate the particular fall hazards to which our employees may be exposed. Specifically, we:

- Inspect the area to determine what hazards exist or may arise during the work.
- Identify the hazards and select the appropriate measures and equipment.
- Give specific and appropriate instructions to workers to prevent exposure to unsafe conditions.
- Ensure employees follow procedures given and understand training provided.
- Apprise ourselves of the steps our specialty subcontractors have taken to meet their fall protection requirements.
- Providing fall protection requires an assessment of each fall situation at a given jobsite. Our criteria for selecting a given fall protection system follow those established at 29 CFR 1926.502, fall protection systems criteria and practices. Each employee exposed to these situations must be trained as outlined in this plan.

Unprotected Sides and Edges

Our employees must be protected when they are exposed to falls from unprotected sides and edges of walking/working surfaces (horizontal and vertical surfaces) which are 6 feet or more above lower levels. We know that OSHA has determined that there is no "safe" distance from an unprotected side or edge that would render fall protection unnecessary. We have chosen the following fall protection for unprotected sides and edges at worksites:

We maintain the systems chosen until all work has been completed or until the permanent elements of the structure which will eliminate the exposure to falling hazards are in place.]

Leading Edge Work, Ramps, Runways

Construction sites may require leading edge work, defined as the edge of a floor or formwork that changes location as additional floor or formwork sections are placed, formed, or constructed. If work stops on a leading edge it will be considered to be an "unprotected side or edge" and will be covered by the section of this plan on unprotected sides and edges. We presume that it is feasible and will not create a greater hazard to implement at least one of the conventional fall protection systems for our leading edge work. We have chosen the following systems for each location where leading edges exist:

Fall Protection or Fall Arrest

Employees who are not constructing the leading edge, but who are on walking/working surfaces where leading edges are under construction, are also protected from a fall by Fall Protection or Fall Arrest.

Hoist Areas

In all situations where equipment and material hoisting operations take place, we protect our employees from fall hazards. When we are involved in hoisting operations we will use the following fall protection systems at these specific locations:

Fall Protection or Fall Arrest

When operations require the materials to be lifted by crane to a landing zone (and do not require an employee to lean through the access opening or out over the edge to receive or guide materials), we can select either personal fall arrest equipment or a guardrail system.

When guardrails (or chains or gates) are removed to facilitate hoisting operations, and one of our employees must lean through the access opening or out over the edge to receive or guide materials they will be protected by a personal fall arrest system.

Holes

We protect employees from tripping in or stepping into or through holes (including skylights) and objects falling through holes (including skylights). We use the following fall protection system to protect our employees working on walking/working surfaces with holes where they can fall 6 feet or more to a lower surface:

Fall Protection or Fall Arrest

At these worksites, covers will be used to prevent accidents. We understand that OSHA does not intend that a guardrail be erected around holes while employees are working at the hole, passing materials, and so on. Therefore, if the cover is removed while work is in progress, guardrails are not required because they would interfere with the performance of work. When the work has been completed, we will either replace the cover or erect guardrails around the hole.

Wall Openings

Employees who are exposed to the hazard of falling out or through wall openings (including those with chutes attached) where the outside bottom edge of the wall opening is 6 feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface must be protected from falling. We protect our employees from falls out or through wall openings by the following methods:

Walking/Working Surfaces Not Otherwise Addressed

We realize there will be situations that are not covered by our written safety plan, for which we have the duty to provide fall protection. All employees exposed to falls of 6 feet or more to lower levels must be protected by a guardrail system, safety net system, or personal fall arrest system except where specified otherwise in Part 1926. We have audited our worksite and have found several fall protection hazards that are not covered elsewhere in this plan. We have taken the following measures to address these hazards:

Fall Protection or Fall Arrest

Training Program

Under no circumstances shall employees work in areas where they might be exposed to fall hazards, do work requiring fall protection devices, or use fall protection devices until they have successfully completed our fall protection training program.

The training program includes classroom instruction and operational training on recognition and avoidance of unsafe conditions and the regulations applicable to their work environment for each specific fall hazard the employee may encounter. The training program is provided by a competent person qualified in each aspect of the program and covers the following areas:

- The nature of fall hazards in the work area.
- Selection and use of personal fall arrest systems, including application limits, proper anchoring and tie-off techniques, estimation of free fall distance (including determination of deceleration distance and total fall distance to prevent striking a lower level), methods of use, and inspection and storage of the system.
- Correct procedures for erecting, maintaining, disassembling and inspecting fall protection systems to be used.
- The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used.
- The role of each employee in the safety monitoring system when this is used.
- Limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs.
- Correct procedures for handling and storage of equipment and materials and the erection of overhead protection.
- The role of employees in fall protection plans.
- The standards contained in Subpart M of the construction regulations.

The **Field Operations Manager** will identify all current and new employees who require training and schedule the classroom instruction for those employees. Training on the above components will occur both in the classroom and on the job site, as appropriate. Classroom training will cover written policy/procedures on fall protection and include a training video on the subject. Job site instruction will include demonstration of and practice in wearing fall protection equipment and any instruction necessary for a specific job.

The **Field Operations Manager** has overall responsibility for the safety of employees and will verify compliance with 1926.503(a), training program, for each employee required to be trained.

The **Field Operations Manager** has the responsibility of determining when an employee who has already been trained, does not have the understanding and skill required by the training program (1926.503(a)).

A written certificate of training is required which must include:

- The name or other identity of the employee trained.
- The date of training.
- The signature of the competent person who conducted the training or the signature of the employer.
- Retraining is required when an employee cannot demonstrate the ability to recognize the hazards of falling and the procedures to be followed to minimize fall hazards.

Fall Protection Plan for Construction

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Enforcement

Constant awareness of and respect for fall hazards, and compliance with all safety rules are considered conditions of employment. The jobsite superintendent, as well as individuals in the Safety and Personnel Department, reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

Incident Investigation

All accidents that result in injury to workers, regardless of their nature, are investigated and reported. It is an integral part of any safety program that documentation take place as soon as possible so that the cause and means of prevention can be identified to prevent a reoccurrence.

In the event that an employee falls or there is some other related, serious incident (e.g., a near miss) occurs, this plan will be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of falls or incidents from occurring.

Changes to Plan

Any changes to the plan will be approved by the safety manager. This plan is reviewed by a qualified person as the job progresses to determine if additional practices, procedures or training needs to be implemented by the competent person to improve or provide additional fall protection. Workers are notified and trained, if necessary, in the new procedures. A copy of this plan and all approved changes is maintained at the jobsite.

Revision	Date	Description of changes	Requested By
1	7/17/2015	Initial Document	KCStorch
2	5/4/2017	Update content (Fall)	KCStorch
3	2/15/2018	Update content (Policy + GHS)	KCStorch
4	12/12/2022	Update Safety Policy + Haz Com TOC	KCStorch
5	9/27/2023	Logo Change – Include cabinets	KCStorch