

Safety Program - Standard Operating Procedure

Original Date: 2/22/08
Updated Date: 12/10/13

Sponsor: Environment, Safety & Health

TITLE: *Sub-Contractor Safety*

Distribution: All sub-contractors

Author:

Brandon Vickous, Safety Director

Buster Stewart, CEO

Reference: 29 CFR 1910
29 CFR 1926
Stewart-Richey Hot Work Permit Procedure
Stewart-Richey Powered Industrial Truck Procedure

Attachment: Appendix A: Equipment Operator Certification Form

PURPOSE

To establish a sub-contractor safety procedure designed to help ensure the safety of all employees and to protect the physical work environment.

SCOPE

This procedure is applicable at all Stewart-Richey jobsites/facilities. Individual jobsites will be expected to customize this policy to meet additional requirements specified by the owners.

APPLICATION

This SOP applies to all cases where sub-contractors perform work at Stewart-Richey jobsites/facilities.

Safety Program - Standard Operating Procedure

I. Responsibilities

A. Management and Supervisors are responsible for:

1. Ensuring that affected employees are informed on sub-contractor safety requirements.
2. Reviewing the scope of the job with the sub-contractors to ensure that all safety aspects have been taken into consideration.

B. Stewart-Richey Safety Director is responsible for:

1. Periodically auditing sub-contractors to ensure that the guidelines set forth in this procedure are being followed.
2. Reviewing Hot Work Permits and Driver Certification Forms (non-company personnel) to ensure that they have been completed properly.

C. Project Manger/Jobsite Supervisor/Safety Director are responsible for:

1. Communicating the guidelines set forth in this procedure to affected sub-contractors
2. Ensuring that the sub-contractors are following the guidelines set forth in this procedure.
3. Verifying that any sub-contractor who operates powered equipment on the company jobsites/facilities is trained to operate that and any other equipment to be utilized.
4. Ensuring that the Contractor Safety Agreement has been signed by individual subcontractors on an annual basis and that these forms have been forwarded to the Safety Director.
5. Ensuring that insurance certification has been provided.
 - Note: Certificates of insurance must be maintained for a period of one year.

II. Definitions

- Designated Area – The area within the jobsite where Hot Work is performed
- Hot Work – Operation that involves cutting, welding, brazing, soldering, torching, or any other work that may produce heat, flames, and/or sparks outside the designated area
- Stewart-Richey Representative – The primary person responsible for communicating job related information between the sub-contractor and Stewart-Richey Construction.

Safety Program - Standard Operating Procedure

III. Procedure

A. Security

- Upon entering a jobsite, all contractors and sub-contractors must register with the jobsite superintendent.
- All sub-contractors must check out at the completion of each workday.
- Sub-contractor personnel may not visit sections of the jobsite not applicable to their work assignment.
- Parking Sub-contractor employees must park in the designated areas at each jobsite as directed by the jobsite superintendent/representative. The maximum speed limit on Stewart-Richey property/jobsite is 5 mph.

B. Conduct

- Alcohol and Drugs No contractor or sub-contractor shall possess, use, or be under the influence of alcohol or illegal drugs at the jobsite or elsewhere on Stewart-Richey property.
- Weapons Possession or use of firearms or any other weapon is not permitted on the person of any personnel while on Stewart-Richey jobsites.
- Tobacco Use of tobacco products is not permitted when "no smoking" signs have been posted. This prohibition includes cigarettes, cigars, pipes, chewing tobacco, and snuff.
- Food and Drink Consumption of food or drink is prohibited except in designated areas. All food and drink should be consumed in the employee break areas.
- Photography No pictures or video recordings are to be taken without written approval from Stewart-Richey Construction.

C. First Aid & Medical Attention (20CFR1926.23)

- Sub-contractors are expected to maintain their own First Aid supplies and have personnel trained in emergency First Aid procedures. Stewart-Richey emergency personnel will provide assistance, if necessary.
- For medical emergencies, dial 911 unless otherwise instructed by the Stewart-Richey project representative and/or their designate.

D. Fire Protection & Prevention (29CFR19 26.24)

- Sub-contractors are responsible for the development and maintenance of an effective fire protection and prevention program at the jobsite throughout all phases of construction.
- Sub-contractors must provide fire extinguisher protection in both type and quantity for the duration of the project. Sub-contractor's employees shall be informed of the locations and techniques of use.
- For fire emergencies, dial 911 unless otherwise instructed by the Stewart-Richey project representative and/or their designate.
 - Note: All fires must be reported immediately to Stewart-Richey project representative.
- In the event of a building evacuation (which will be indicated by an emergency siren, a verbal announcement, or both) workers should evacuate the building through the nearest exit, and proceed to the designated assembly area for head counting. Stay clear of gate areas to permit emergency vehicles to enter. Await clearance from appropriate management personnel or a representative from the fire department before re-entering the building.

E. Housekeeping (29CFR1926.25)

Safety Program - Standard Operating Procedure

- All trash shall be deposited in proper receptacles. Good housekeeping is a must at all times. Food trash must be placed in food trash containers only.
- Glass containers are not permitted on the jobsite. These can break and pose an unnecessary hazard. Use plastic or metal containers for all food or beverage brought onto the jobsite.
- Disposal of any liquid or solid material is not permitted on any Stewart-Richey jobsite. Burning of any construction materials or other refuse is not permitted on any Stewart-Richey property or jobsite.
- All materials stored on Stewart-Richey property must be maintained in a safe and orderly manner.
- Keep exits and escape routes clear and unobstructed at all times.
- Each sub-contractor must make arrangements for disposal of their construction/demolition, debris, waste, and unused material. Arrangements may be made with the Project Manager for this service (i.e. use of Stewart-Richey dumpsters.)

F. Personal Protective Equipment (29CFR1926 SUBPART E)

- It is the personal responsibility of the sub-contractor to provide such items as hard hats, safety glasses, goggles, face shields, gloves, respirators, and other items of personal protective equipment which may be required for sub-contractors and sub-contractor's employees. Sub-contractor shall require usage of these items, as necessary to protect the employees from job hazards.
- Occupational Foot Protection (1926.96) Subcontractor and his/her employees must wear hard soled footwear meeting ANSI Z41.1-1967 specifications.
- Head Protection (1926.100) Protective helmets must be worn by sub-contractors working in areas where there is possible danger of head injury from impact of falling objects. Protective helmets must meet ANSI Z89.1-1969 specification. Subcontractors working in areas where there is a possible danger to high voltage electrical shocks and burns must wear protective helmets. Protective helmets must meet ANSI Z89.2-1971 specification.
 - Note: Hard hat to be worn at all times on Stewart-Richey commercial jobsites.
- Hearing Protection (1926.101) Sub-contractors must wear hearing protection as necessary to protect workers.
- Eye and Face Protection (1926.102) Safety glasses with side shields meeting ANSI Z87.1-1968 must be worn at all times in designated areas and/or while on the jobsite.
 - Note: Additional eye/face protection (i.e. face shield, goggles) shall be provided by the sub-contractor where hazards require.
 - Dark or tinted safety glasses are not permitted inside buildings.
- Clothing Shirts that cover the entire mid-section of the body and have at least 4" sleeves are required. Tank tops, body shirts, halters, etc., are not acceptable. Full length pants without excessive length or flare bottoms are required to minimize any tripping hazard. Long, dangling jewelry shall not be worn at the construction site. No loop earrings or loop body piercing will be allowed.

G. Respiratory Protection (29CFR1926.103)

- The requirements applicable to construction work are identical to those set forth in 1910.134.
- The sub-contractor must have a written respiratory protection program as required in 1910.134.
- Subcontractors must train their employees in the use, limitations, proper fit, and care of respirators.
- Sub-contractors must insure that their employees have been medically approved to wear a respirator.
- To insure a proper seal is obtained, no facial hair is permitted while using a respirator.

H. Safety Belts, Lifeline, and Lanyards (29CFR1926.104)

Safety Program - Standard Operating Procedure

- Fall protection is required for all sub-contractors working in elevated work areas and it will be up to the sub-contractor to implement a fall protection plan that complies with 1926.502.
- Fall protection is required to be worn when working on: sloping roofs, flat roofs with handrails, within six feet of the edge or roof opening, any suspended platform or stage, elevated work areas greater than six feet unless employees are protected from falling by standard handrails. During all steel erection, workers must wear full body harness with lanyard and be anchored off 100% of the time. Safety belts are no longer viewed as an acceptable form of fall protection and can only be used as a positioning device.
- Equipment that is equipped with roll-over protection systems (ROPS) must have a seat belt installed and worn at all times while operating the equipment.

I. Welding and Cutting (29CFR1926 Subpart J)

- Any Hot Work performed outside the designated area requires that a Hot Work Permit be issued in accordance with Stewart-Richey Hot Work Permit Procedure.
 - Note: Hot Work is defined in Section II of this procedure.
 - Sub-contractors involved in cutting or welding operations shall be furnished by the sub-contractor with the appropriate filtered lenses, protective clothing, and PPE as required.
 - Workers will be protected by guard rails, man baskets, etc., to ensure all personnel are protected from falls.

J. Hazard Communication

- Before starting work, the sub-contractor must notify the Stewart-Richey representative and/or designate of any hazardous materials that will be brought into the facility (i.e. flammables, reactives, corrosives, or radioactives, etc.)
- A Stewart-Richey project representative shall inform the sub-contractors of potential hazards and hazardous materials which may be encountered on the job.
- All hazardous materials must be properly labeled and stored.
- Safety Data Sheets (SDS) must be readily available for any hazardous material brought on-site by the sub-contractor and furnished to the jobsite supervisor/superintendent.
- Disposition, protection, storage, proper use, security, and disposal of unused, used, left over and contaminated hazardous materials is the direct responsibility of the sub-contractor that brings it on the jobsite. Absolutely NO hazardous materials will be placed in Stewart-Richey dumpsters, barrels, or containers of any type. They will not be buried, dumped, or left on the jobsite. Sub-contractors will be totally responsible for the use and disposal of their hazardous waste.

K. Safety

- It is the responsibility of the sub-contractor to insure that all work practices comply with the occupational Safety and Health Act of 1970 and all other relevant federal, state, and local laws.
- The Stewart-Richey representative and/or his/her designate shall halt any work which they feel is immediately dangerous to life, health, or property.
- It is the responsibility of the sub-contractor to perform all tasks and activities in a safe manner. If the sub-contractor is uncertain about the safety of a specific task, they should ask the Stewart-Richey representative and/or their designate.
- All construction equipment shall be properly maintained and periodically inspected to insure safe operating conditions.

Safety Program - Standard Operating Procedure

- Intrinsically safe equipment may be required in certain work areas; the Stewart-Richey will inform the sub-contractor of such areas.
- All electrical repairs are to be made by qualified personnel using proper procedures and equipment.
- Compressed gas cylinders must be stored upright and chained to a secure structure.

L. Signs, Signals, and Barricades (29CFR1926 Subpart G)

- At locations where potential hazards exist, sub-contractor personnel shall be responsible for posting, installing, and maintaining signs, signals, and barricades to detour passage of persons or vehicles.
- Barricades must be 42 inches high and shall be kept back six feet from the edge of excavation, holes, platforms, and roofs. Any excavation, floor opening, overhead, roofing, or hazardous material handling work must be properly barricaded and/or guarded to prevent employees or others from entering a dangerous area.
- Red barricade tape is to be used in situations where entry is prohibited or requires special permission. Yellow tape with caution warning is to be used where entry is allowed as long as caution is used.

M. Ladder (29CFR1926 Subpart J)

- Use of metal or aluminum ladders is not permitted.
- Extension ladders should be placed with the base one quarter of the ladder length from the wall. Whenever possible, ladders should be blocked at the base and secured with rope at the top, and extend three feet above roof eave, prior to use.
- Ladders should not be placed in front of doors or windows except under unusual circumstances and then only when proper safeguards have been taken.
- Tool hoists shall be employed to lift materials to employees working aloft; employees shall not carry material in their hands while ascending or descending ladders.

N. Hoists and Scaffolds (29CFR1926 Subparts L and N)

- Hoisting equipment shall not be restrained. Rope tackle, slings, and chain hoists must be inspected prior to use to insure adequate capacity and good working condition.
- Scaffolds must be properly installed and secured. Scaffolds over six feet high shall be equipped with handrails, mid-rails, toe-boards, and deck-boards. Where railings are not practical, employees shall use safety harnesses and lanyards.

O. Hand and Portable Power Tools and Equipment (29CFR1926 Subpart I)

- Tools must be properly selected for the given job and in good condition. Tools must be used safely and properly.
- Tools must be maintained and used in such a manner that they do not present a danger to employees or passers-by.
- Power tools and equipment must be grounded and have all guards in place and in working order.
- Power tools and equipment must not be left running unattended and must be disconnected prior to any adjusting, inspecting, or repairing.
- Power tools shall not be used in any dangerous environments such as damp or wet conditions, unless appropriate ground-fault circuit interrupters are used in conjunction with the power tools.
- All electrical tools shall be tested and inspected periodically by a qualified electrician.

Safety Program - Standard Operating Procedure

- Gasoline powered equipment shall not be permitted inside any building or building under construction without specific written permission of the Stewart-Richey safety director.

P. Lockout Procedures (29CFR1926 Subpart K)

- All energy sources (electrical, chemical, thermal, pneumatic, hydraulic, and mechanical) must be reduced to a zero energy state and properly locked and tagged out.
- For equipment with more than one energy source, the Stewart-Richey project representative is to review the specific lockout/tagout procedure with the sub-contractor.
- Individual locks must be used to secure energy isolating devices. Locks must be individually keyed for each sub-contractor employee.
- All sources of energy must be isolated using an energy-isolating device or by physical separation. Energy control must be verified before working on equipment or processes by attempting to start the equipment or by the use of measurement instruments.
- Sub-contractor employees will insure that their own lock and tag are in place before proceeding with the job.
- A lock and tag must be affixed and removed only by the employee who installed it. No one shall remove another employee's lock.
- Gang-lock adapters may be used where multiple employees are working on the same equipment.
- All lockout devices are to be removed promptly after work has been completed.

Q. Powered Industrial Truck/Man lifts/Motorized or Electrically Powered Equipment

- Only authorized sub-contractors will be permitted to operate a powered industrial (PIT) truck or equipment listed above on Stewart-Richey property, unless trained and certified, regardless of ownership.
- The Stewart-Richey project representative must verify that contractors operating powered industrial trucks on Stewart-Richey property are trained. Appendix A of the Stewart-Richey Standard Operating Procedures be completed prior to any contractor operating any powered equipment on Stewart-Richey jobsites.

R. Confined Space/Vessel Entry Procedures (29CFR1926.21 (B)(6) & 29DFR1910.146)

- A confined space entry permit, signed by the Stewart-Richey safety director is required prior to entering confined spaces. This permit ensures that the space is safe for human occupancy. Only trained and authorized employees may work in confined spaces. Sub-contractors must follow facility procedures.
- Before a permit is issued, the following precautions must be taken:
 - The confined space must be emptied and ventilated.
 - All equipment must be in a state of zero energy. The equipment must be locked and tagged out.
 - Confined space isolation must be discussed with the safety director prior to entry.
 - Atmospheric testing must be performed.
 - A trained attendant must be stationed (cannot leave the area unless relieved by another attendant) at the confined space during the period that personnel are in the confined space. The attendant is to maintain communications with personnel in the confined space and summon help if an emergency occurs. The attendant must never attempt a rescue.
 - It is the responsibility of the sub-contractor to obtain the confined space entry permit from the Stewart-Richey safety director.

Safety Program - Standard Operating Procedure

S. Hazardous Waste Operations and Emergency Response (29CFR1926.65)

- Sub-contractors who conduct work on regulated sites must have the appropriate 40-hour training (HAZWOPER/HAZMAT).
- Provisions in the Site Safety and Health Plans must be reviewed, understood, and adhered to by all site personnel.

T. Painting (20CFR1926.55, 1926.57, 1926.103, 1926.152)

- Respiratory protection may be required for painters during spraying and application operations.
- Fall protection must be worn when painting operations are greater than six feet above the ground and standard handrails are not provided.
- Sub-contractors must get approval from the job site supervisor to store paints, solvents, and flammable liquids inside a building.

U. Demolition

- Demolition is a highly specialized activity and requires careful planning and competent supervision. Prior to permitting employees to start demolition operations, a survey shall be made of the structure to determine its condition.
- The area must be barricaded to prevent unauthorized personnel from entering.
- ANSI approved head protection is mandatory.
- Any asbestos containing material must be removed according to local, state, and federal regulations. Abatement workers must hold current licenses from the state in which they will be conducting work. If you suspect asbestos, call the Stewart-Richey safety director immediately.
- Materials must be lowered to the ground by using cranes or dust-tight chutes, licensed/certified removal personnel only.
- Never allow employees to work below other employees within the demolition area.
- Never leave unstable structures in place without providing for temporary support.
- The Federal Environmental Protection Agency, through the NESHAP (National Emission Standards for Hazardous Air Pollutants), has established a notification requirement for all demolition projects.
- It will be the sub-contractor's responsibility to complete and submit all notification forms in a timely manner and supply copies of the notifications to the Stewart-Richey representative and/or their designate.

V. Insulation (29CFR1926.58)

- Any unknown material is to be treated as asbestos containing material until determined otherwise. Sub-contractor personnel are prohibited from removing or disturbing material until the insulation is determined to be asbestos free.
- Asbestos containing materials must be removed according to local, state, and federal agencies.
- It will be the sub-contractor's responsibility to complete and submit all notification forms in a timely manner, as well as supply copies of the notifications to the Stewart-Richey project manager.

W. Excavations (29CFR1926 Subpart P)

Safety Program - Standard Operating Procedure

- Excavations and trenches must be barricaded to protect pedestrians and vehicles. All excavated materials must be piled at least three feet back from the edge of the excavation.
- All walls and faces of trenches that are greater than five feet deep must be shored, sloped, or benched to eliminate the hazard of cave-in.
- A ladder for employee exit and access must be provided. An employee working in the trench must not have to walk more than 25 feet to gain access to a ladder.
- The air in the trench is to be tested prior to entrance when the possible presence of harmful gas or a state of oxygen deficiency exists. Continuous monitoring of the air in the trench may be necessary depending on the project/area.
- Employees are not permitted to work beneath suspended loads or loads of moving earth during the excavation.

X. Steel Erection (29CFR1926 Subpart R)

- The area below steel erection must be barricaded to prevent access by unauthorized personnel.
- A safety railing of one-half inch wire rope or the equivalent shall be installed 45 inches high, around the perimeter of each floor during erection.
- A hoisted steel member shall not be released until it is anchored by at least two bolts.
- Tag lines must be used to control loads.
- Personnel are prohibited from climbing columns, walking on beams, traversing the trusses and sitting on top of columns unless fall protection is provided and used properly.
- Tools and containers for rivets, bolts, or welding rods must be secured to prevent falling.

Y. Vehicles and Equipment (29CFR1926 Subpart O)

- Sub-contractors shall insure that their own employees abide by OSHA standards regarding the use of all powered vehicles and equipment.
- Vehicles' speed limit on Stewart-Richey property is 5 mph. Drivers shall maintain safe following and stopping distances. Vehicles shall not be left unattended in an operable condition and shall not be operated in an overloaded condition. In addition, vehicles shall not be ridden on unless specifically designed for that purpose.
- If the equipment is equipped with a seat belt, the seat belt must be worn at all times.
- Only regulation personnel platforms may be used for the lifting of employees.
- Only authorized and properly trained employees may operate vehicles or equipment.
- All equipment must be equipped with an audible reverse alarm.
- Sub-contractor may not use Stewart-Richey owned equipment without prior approval from the Stewart-Richey representative and/or designate.
- Sub-contractor's equipment brought onto Stewart-Richey jobsites must be inspected and maintained to the manufacturer's specifications.

Safety Program - Standard Operating Procedure

The subcontractor is required to keep a copy of Stewart-Richey's Standard Operating Procedures (SOP) as a reference for all safety requirements on Stewart-Richey jobsites/facilities. Subcontractors must completely fill out and return pages 10-11 to his/her Stewart-Richey Representative before work will be permitted to start.

Subcontractor: _____

Date: _____

On the date above, this subcontractor received a copy of the Stewart-Richey's SOP concerning safety, health, and security rules for subcontractors. This subcontractor acknowledges it has reviewed the SOP and fully understands each policy and procedure. The subcontractor has given a copy and reviewed the SOP with its employees.

While performing services for our company, this subcontractor, its employees and agents agree to abide by Stewart-Richey's SOP described therein, and shall comply with all federal, state and local laws and regulations governing the services or work performed by the subcontractor, including but not limited to the Occupational Safety and Health Act of 1970.

Agreed to by: _____

Title: _____

Print Name: _____

Date: _____

Safety Program - Standard Operating Procedure

Stewart Richey SOP - Appendix A
Equipment Operator Certification Form: Subcontractor

This form is to be filled out and signed by a responsible individual for every non-company person who operates any powered equipment (forklift, boom lift, excavator, etc...) on Stewart-Richey premises. No individual is allowed to operate any powered equipment unless they have a current certification.

The individual(s) listed below have received proper training (as required by OSHA) and have demonstrated to my satisfaction that he/she has sufficient skill and competency to operate, in a safe manner, the powered equipment listed below. He/she is hereby authorized to operate these piece of equipment on Stewart-Richey Construction site.

Company Name: _____

Authorizer's Name: _____

- Has the individual(s) been trained by his/her employer on the safe use and operation of the powered equipment in question? Yes _____ No _____
- Has the individual(s) been given a skills evaluation by his/her employer on the safe use and operation of the powered equipment in question? Yes _____ No _____
- Has this training been documented? Yes _____ No _____

<u>Employee's Name</u>	<u>Type of Equipment</u>	<u>Date of Training</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Subcontractors must be approved before using any Stewart-Richey owned powered equipment. You may be asked to produce training records to verify use of equipment. If a subcontractor uses their own powered equipment, proper maintenance and daily inspections must be recorded to ensure compliance. Operators that display incompetency while operating equipment will be pulled from the equipment. Please list the any powered equipment you plan to bring to use onsite on the lines below:

Type of Equipment: _____

By signing below, you are authorizing that all the information above is correct.

Authorized by _____ Date _____

Title _____ Company _____

Concurred by _____ Date _____

Safety Program - Standard Operating Procedure

Jobsite Supervisor Or Divisional Manager