

Injury & Illness Prevention Program

IIPP

Revision 1.6

February 2022

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1.0 BEI Construction Safety Policy Statement

BEI Construction incorporates safety into every aspect of our daily business operation. It is our intent to

not only comply with all applicable laws and regulations, including Federal and State Standards, Labor

Code, and General Industry/Construction Industry Safety Orders, but to do what is necessary to provide a

safe and healthy work environment for our employees, sub-contractors, and customers.

Each of our employees is empowered to refuse any work or task that they believe is unsafe or that involves

unnecessary risk. We understand and believe that safety is every employee's responsibility, and that

includes everyone involved, from the top down. We expect our employees to be engaged in our safety

program which includes ownership in detecting, communicating, and mitigating hazards in the workplace,

as a condition of employment. Employees are required to inform their supervisor immediately of any

hazardous situation that is beyond their ability or authority to correct.

It takes team work to create an Injury and Incident Free work environment and that is what we are committed

to do at BEI Construction. Through coaching, mentoring, and dedicated leadership of the safety program

by our supervisors and workforce, we are committed to be a safety leader in our industry. Only through

such a cooperative effort can we achieve our goal of making our work environment as safe as possible.

Michael Rantz

President

BEI Construction, Inc.

Purpose and Objective

BEI Construction' management is committed to the safety and health of all employees and recognizes the need to comply with regulations governing injury, incident prevention and employee safety.

The primary objective of this Injury and Illness Prevention Program (IIPP) is to help provide a safe and healthful workplace that is in compliance with Cal-OSHA Regulations. It is our goal to:

- 1. Establish and maintain an effective Injury and Illness Prevention Program.
- 2. Provide a safe and healthy work environment.
- 3. Establish effective safety policies, provide training, initiate operational procedures, and generate active management involvement.

In addition, our goal is to ensure active participation in the Health & Safety program for all employees. This IIPP will be further reviewed by all members of supervision and will be discussed during the "New Hire Orientation" process of all new employees. Each employee will have access to read and review a copy of this IIPP and code of safe work practices.

2.0 Responsibilities

All employees are expected to comply with requirements detailed in our Injury Illness Prevention Program and to participate in ensuringle a safe working environment exists at all times. Each of the following roles and responsibilities are critical to the success of our program:

- 1. **Senior Management** is responsible for overseeing the Injury Illness Prevention Program and will ensure adequate support is provided to effectively implement the contents of this IIPP.
- 2. **Project Management** will be responsible for coordinating the Injury Illness Prevention Program with support from management and safety consultants and will be responsible for the following:
 - o Establish IIPP and project specific safety requirements on all new projects.
 - Oversee the maintenance of records as prescribed by Cal/Federal OSHA.
 - o Perform follow-up investigations of incidents and injuries as required.
 - o Provide information regarding injury/incidents, incident reports and safety issues to management.
 - o Perform all duties necessary to ensure compliance with applicable safety and health regulations.
- 3. **Superintendents/Foremen** are responsible for the oversight and implementation of all safety requirements within their areas of responsibility, for the following:
 - Direct and coordinate safety activities on their projects.
 - Direct supervision and/or personnel within their responsibility to utilize proper personal protective equipment and to follow all safety requirements.
 - o Ensure that all necessary safety equipment is readily available to employees at their jobsite.
 - Hold employees accountable to conduct safety inspections of their work areas prior to starting work and to always work in a safe manner, following established safety protocols.
 - Conduct their own safety inspections of work areas and locations personnel as required.
 - Hold Foremen accountable to conduct effective tailgate safety meetings in keeping with current company policy.
 - Monitor employee understanding of safe work practices and safe conditions on jobsites through periodic employee evaluations.
 - Ensure all new employees attend new employee orientation before stating work and assess that the new employee is capable of performing his or her task safely.
 - Ensure that all injuries and incidents are properly and effectively investigated to determine how the injury/incident occurred and what corrective action is needed.
 - o Encourage employee safety suggestions to improve workplace safety.
 - Ensure all subcontractors on their projects are meeting the requirements of this IIPP and are maintaining their work areas in a safe manner and are in compliance with set safety standards and best work practices.

- 4. All Employees are required to develop and demonstrate safe work habits and follow the requirements outlined in this IIPP and the BEI Safety Manual. Each new BEI Construction employee is given access to this "Injury Illness Prevention Program" which contains the "Code of Safe Practices." All employees must sign and return a receipt to their immediate supervisor. In addition, all employees are required to:
 - Assist supervisor in identifying potential or actual hazards in the workplace.
 - o Follow the "Code of Safe Practices" when performing your duties.
 - o Use and maintain the safety equipment provided in a proper manner.
 - o Report all injuries and incidents to your supervisor immediately.
 - o Report all unsafe conditions or unsafe practices observed.
 - Use all Personal Protective Equipment (PPE) as required.
 - o Inspect all assigned equipment prior to use to ensure equipment is in good safe working condition.
 - Assist your fellow employee in following the safety rules and regulations.
 - o Maintain your work area in a clean and sanitary condition at all times.
 - Wear appropriate protective gear, such as gloves, hard hats, footwear, eye protection, ear protection, respiratory protection, as needed for the specific job being performed.
 - Adhere to supervisor's and manufacturer's instructions when handling or working with all equipment, materials or hazardous materials.
 - When an emergency occurs, evacuate the area as necessary and notify your immediate supervisor of your location.
 - o Attend all tailgate safety meetings conducted for their crew.
 - o Respect Company property and see that it is protected and maintained at all times.
- 5. **Subcontractors** are responsible for meeting the minimum requirements detailed in this Injury & Illness Prevention Program, as follows:
 - o Maintain an IIPP that meets or exceeds the BEI IIPP requirements.
 - Ensure all employees under their supervision are properly trained, authorized to perform assigned work and are provided with the tools, equipment and direction necessary to complete their work safely.
 - o Ensure compliance with all State/Federal/Local Regulations, Company Safety Policies and Procedures.
 - Assess and recognize the hazards associated with each task by conducting pre-task safety planning.
 - Observe and evaluate work conditions and procedures continuously to detect and correct unsafe conditions and unsafe practices - provide direction to eliminate identified hazards.
 - Conduct safety inspections of work area using the designated company forms and direct the correction of noted items.
 - Ensure that all employees under their supervision are aware of and comply with requirements for safe practices and safe conditions.
 - o Enforce all safety rules, procedures, and policies, utilizing appropriate disciplinary actions

- necessary to obtain compliance.
- Assist BEI project supervision in identifying hazards in the workplace.
- o Use and maintain the safety equipment provided in a proper manner.
- Report all injuries and incidents to BEI supervision immediately.
- o Report all unsafe conditions or unsafe practices observed.
- o Use all Personal Protective Equipment (PPE) as required.
- o Inspect all assigned equipment prior to use to ensure equipment is in good safe working condition.
- o Always maintain your work area in a clean and sanitary condition.
- Adhere to supervisor's and manufacturer's instructions when handling or working with all equipment, materials or hazardous materials.
- When an emergency occurs, evacuate the area as necessary and notify your immediate supervisor of your location.
- o Document all tailgate safety meetings conducted for their crew.
- o Respect BEI property and see that it is protected and maintained at all times.

3.0 Ensuring Compliance

To achieve compliance, BEI Construction utilizes a positive recognition program to reward our safety role models and a disciplinary program for those exhibiting unsafe acts and behaviors. The following are some of the many approaches our company uses to ensure that all employees know and understand the importance of safe work practices, and how to apply them to their daily work activities.

Disciplinary Action Program

- A. When required due to non-compliance, BEI disciplines workers for failure to comply with safe and healthful work practices. For discipline purposes we have grouped violations into Serious and Non-Serious categories. A Serious Violation is one that has a realistic probability that death or serious physical harm could result from the actual hazard created by the violation or willfully ignoring safety rules. All other violations will be considered Non-Serious. The following outlines our disciplinary process:
 - 1. For a Non-Serious Violation within a 12-month period:
 - ✓ First Violation Verbal warning (must be documented in employee's file)
 - ✓ Second Violation Written warning notice
 - √ Third Violation Suspension without pay (length to be determined, one day to one week)
 - ✓ Fourth Violation Termination
 - 2. For a Serious Violation within a 12-month period:
 - ✓ Depending on the severity of the violation, and at the discretion of any level of management, serious violations may result in immediate termination.
 - √ First Violation Suspension without pay (length to be determined, one day to one week)
 - ✓ Second Violation Termination

Zero Tolerance

- A. The following Zero Tolerance violations may be grounds for immediate termination:
 - 1. Drug or alcohol on site.
 - 2. Fighting, threatening, or endangering others.
 - 3. Removing or bypassing safety devices on power tools or equipment, i.e.: removing or pinning saw guards, removing safety spring on nail guns, etc.
 - 4. Failure to follow a fatality prevention program such as:
 - a. Not using fall protection where required.
 - b. Not following the Control of Hazardous Energy Program where required.
 - c. Not following the Trenching/Excavation Program where required.
 - 5. Removing or damaging safety equipment.

6. Knowingly violating a written rule or procedure.

Employee Conference Report

Employee Name:		-	
Employee #:		-	
Employee Last 4 SS #	:	-	
Date:		-	
Position:		-	
Check One:	☐ Congratulatory ☐ Disciplinary		
Statement of what Occ	curred:		
	(1 2)		
Employee acknowledg	jment/ Plan of Action:		
Supervisor's Commen	nts/ Recommendations/ Disciplina	ary Action (as appli	cable):
Follow up Date:			
Employee Signature:		Date:	
Supervisor's Signature:		Date:	
Witness Signature:		Date:	
Copies sent to Employ	yee's Personnel Record. Yes	No	

Subcontractor Safety Violation Procedures

BEI Construction is committed to providing and maintaining a safe working environment for all employees, subcontractors, visitors, and the public. To maintain these ethics and practices, BEI Construction' site management personnel will enforce safe work practices along with State/Federal Health and Safety Standards at all times. All unsafe conditions, acts, or behaviors observed by our Project Management team will be addressed immediately and corrective actions implemented before work can resume.

BEI Construction has implemented this Subcontractor Safety Violation process to ensure that subcontractor employees are held accountable for their actions and identified unsafe acts or hazards are corrected. This process will allow our Project Management team to track first offence and repeat safety violations by subcontractor and/or subcontractor employees and ensure corrective actions are administered before an injury or loss occurs. A formal violation will be issued to the subcontractor employee based on the type, frequency, and severity of safety infraction(s) per the following three step process that includes:

- Formal violation issued to employee with written action plan by the employee and site management of the company required.
- 2. Formal violation issued to employee with notification to the main office requiring a written plan along with a visit to the site by company top management personnel.
- Immediate removal of offending subcontractor employee(s) from the project. Removal of a subcontractor employee will result in written corrective action plan along with a visit to the site by company top management personnel.

Depending on the severity of the offence, employees can be removed from the project for their first offense.

Subcontractor Conference Report

Subcontractor Company Name:					
Subcontractor Employ	/ee Name:				
Subcontractor Last 4	SS or Employee #:				
Date:					
Position:					
Check One:	☐ Congratulatory ☐ D	isciplinary			
Statement of what Occ	curred:				
Subcontractor Employ	/ee acknowledgment/	Plan of Action:			
Subcontractor Superv	isor's Comments/ Rec	commendations/	Disciplinary A	Action (as applicable):	
Follow up Date:					
Subcontractor Employe Signature:	e 		Date:		
Subcontractor Supervisor's Signature:			Date:		
	-				
Witness Signature:			Date:		

Safety Recognition Program

Recognition Program

BEI Construction utilizes a safety recognition program to recognize and reward their employees for safe work practices, adherence to BEI Construction policies and role modeling safe behaviors. This form should be completed by supervisors and awarded during toolbox meetings or other safety forums.

Employee Name:		-	
Employee #:		-	
Employee Last 4 SS #:		-	
Employee was recognized for th	e following reasons:		
☐ Safe Work Habits ☐ Safety S	uggestion □ Safety Leader	rship □ Safety Performance □ Oth	er
Actions Recognized:			
Recognition Given:			
Person Giving Recognition:			
Date:			
Project:			

4.0 Communications and Recordkeeping

In an ongoing effort to ensure that all employees are routinely advised of safety matters, and to ensure that employees report hazards and near misses in the workplace, BEI Construction adheres to the following methods.

General Information

- A. New employees are informed at the time of hire that they should report all unsafe or hazardous conditions to their supervisor immediately. Further, they are informed that there will be no negative repercussions as a result of their reporting of unsafe conditions or unsafe work practice. Such reports can be made anonymously, if desired by the employee, to ensure confidentiality and no possible negative consequences of reporting.
- B. Management and supervision are required to facilitate a continuous flow of two-way communication with employee's safety and health information in a form that is readily understandable to and between all affected site personnel.
- C. Employees are expected to communicate any time any time they observe an unsafe work practice, unsafe condition or a near miss is observed in the workplace.
- D. Tailgate Safety Meetings are held weekly, and employees are given the opportunity to give feedback on safety observations.
- E. Periodic Subcontractor Safety Meetings are conducted at each BEI Construction project and information provided is to be discussed with field employees at the next regularly scheduled tailgate meeting.
- F. A Safety Committee is maintained to set company policy, circulate safety information, and determine additional safety issues that need company attention. This group meets at least quarterly and includes senior BEI Construction management and field personnel.
- G. All required employee notification and communication posters will be displayed in areas where employees gather. Newsletters or notices will be used to provide additional information to employees on company and safety matters, as needed.

Tailgate Safety Meetings

One of the responsibilities of the project superintendent and/or foremen is to provide tailgate safety meetings at least weekly and to ensure that each available employee is in attendance. Project management will ensure that appropriate safety topics are provided in advance and that records are kept of each safety meeting. The following information is required for record keeping purposes and shall be returned to the main office:

Crew designation or Job Site
Name of the Foreman giving the tailgate safety meeting
Name of each employee in attendance

Company identification number for each employee in attendance to verify presence
Date of tailgate safety meeting
Topic
Discussion/questions & recommendations for improvement

Recordkeeping

- A. Records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions, and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices shall be recorded and maintained in the project office and retained as required.
- B. Documentations of safety and health training for each employee including the new hire orientation, weekly safety meetings and specific required training shall be maintained in the project office and retained as required.
- C. All training documentation shall include the employee's name and/or another identifier, training dates, type of training, and the instructor's name shall be recorded on the training sign in sheet.
- D. Incident and Injury reports will be maintained in the corporate office.
- E. OSHA 300 Logs will be kept up to date and posted as required.
- F. Medical records (such as for respirator medical evaluation) are to be kept confidential and separate from other employee records (e.g., timesheets, training).
- G. Record retention.
 - 1. All records will be kept on hand for a minimum of five years.
 - 2. Employee medical records must be maintained for at least the duration of employment plus 30 years. This does not include health insurance claims or first aid records. The medical records of employees who have worked for less than 1 year at BEI Construction need not be retained beyond the term of employment if they are provided to the employee upon the termination of employment
 - 3. Exposure records that describe the identity of, and possibly the level of exposure to, a toxic substance or harmful physical agent must be preserved for at least thirty years.
 - 4. Safety Data Sheets (SDS) must be kept on file for chemicals currently in use. SDS for chemicals formerly used need not be retained for any specified period as long as some record of the identity (chemical name if known) of the substance or agent, where it was used, and when it was used is retained for at least thirty (30) years.

5.0 Hazard Identification & Correction

In order to identify and assess hazards, BEI Construction will administer a program of evaluation and inspection. This process will be conducted at appropriate intervals and whenever an identified hazard (potential or real) is reported. In addition to periodic documented inspections, visual inspections will be conducted daily by the project manager and foreman to inspect for and correct unsafe conditions and acts.

Job Hazard Analysis

The Job Hazard Analysis is a Step-by-Step analysis of a task, process, or operation that will answer the following questions: the purpose of the job, what has to be done, what activities are involved, sequence of basic job steps, potential hazards, and most importantly, recommendations for hazard elimination or control.

- A. The Job Hazard Analysis (JHA) is an important incident prevention tool that works by finding hazards and eliminating or minimizing them BEFORE the job is performed.
- B. JHA's can be used as a tool for job clarification and hazard awareness, and as a guide in identifying potential and real hazards.
- C. The JHA provides a process where senior employees can assist in hazard identification and assist new employees in understanding the work process.

Safety Pre-Task Planning (PTP)

A Safety Pre-task plan is a tool used to prevent incident and injuries in the workplace. It enables clear communication on the task to be performed, potential hazards (for both the task and work area), and control strategies to be implemented.

- A. Supervisors must ensure a PTP has been completed prior to work starting.
- B. Supervisors review the PTP with all crew members and solicit any feedback.
- C. Supervisors ensure all crew members understand, sign, and follow the PTP for their task.
- D. Keep the PTP in the work are of the crew so that when conditions change, edits can be made.

Correcting Unsafe Conditions and Unsafe Work Practices

Identification of unsafe conditions and unsafe work practices is critical to the overall success of our company safety program. In an ongoing effort to ensure that all identified unsafe conditions and work practices are properly and adequately corrected, BEI Construction will adhere to the following:

- A. All employees of the company are empowered to report hazards and unsafe practices. No employee shall be retaliated against for reporting hazards or potential hazards, or for making suggestions related to safety. BEI Construction encourages its employee to notify the appropriate persons to ensure the identification and the elimination of hazards and unsafe acts on the job.
- B. Any unsafe condition or work practice identified through the inspection process, as a result of an incident investigation or an employee report will be reported to the Superintendent so that immediate corrective actions can take place.

- C. An imminent hazard identified will require the immediate removal of all affected employees from the hazardous conditions. Upon determination of appropriate corrective action, adequate precautions and safeguards will be taken to control the exposure while affected employees correct the imminent hazard. No BEI Construction employee will be allowed to reenter the work site until the identified imminent hazard is corrected.
- D. All documented unsafe conditions or work practices will be evaluated by the Superintendent and/or Safety personnel to determine severity and set a priority for corrective action.
- E. Corrective Action follow up will occur to make certain that items placed on the "Action List" are completed.

6.0 Incident Investigation

It is the responsibility of each Foreman, Project Manager, in conjunction with the BEI Safety Department, to conduct an investigation of any injury, incident, or near miss that occurs under their authority. All injuries and incidents will be investigated to identify cause and establish preventive measures.

Incident Reporting Process

- A. Employees must report all incidents work related injuries/illnesses to their foremen or immediate supervisor even if they do not feel that it requires medical attention. Failure to do so may result in a loss of Workers Compensation benefits and/or disciplinary action.
- B. The Superintendent/foreman and the employee must determine the extent of the injury and determine whether medical attention is necessary. If so, the employee should be sent to the designated medical facility immediately.
- C. BEI Construction employees will be informed at the time of hire and new job assignment of the designated medical facility. The name of the facility and directions from the jobsite will be posted.
- D. For severe injuries/illnesses, call 9-1-1 and request the Paramedics; the Superintendent or foreman will then notify BEI Construction of the nature of the incident.
- E. In all cases, the employees **will not** transport injured/ill co-workers unless authorized to do so by BEI Construction management. Transportation shall be provided by the Supervisor, Foreman or their designated responsible employee.
- F. As soon as possible after the incident, an Incident Report form must be completed by the foreman or supervisor and should be submitted to BEI Construction management within 24 hours. Always include: Job Name, Job Number and address, name of the injured person(s), date, time, location, what happened (brief statement), and witnesses, if any. Obtain an employee statement and witness statements (as applicable). The JHA and Safety Pre-Task Plan for that process involved in the incident will be reviewed as part of the incident investigation.
- G. If an injured employee refuses medical attention, note the employee's refusal of treatment on their signed employee statement.
- H. If the injury or accident appears questionable in nature, document this on the report and include reasons for questioning.
- I. If the employee went to a medical facility or hospital for treatment, you must get a return-to-work order from the treating physician. If the return-to-work order notes modified duty required, contact the applicable Superintendent for direction.
- J. Subcontractor personnel must inform BEI Construction about any incident or injury or emergency on site within 1 hour. If emergency vehicles are called to the site, as soon as the call is made inform BEI Construction site supervisor and/or call the BEI Construction office.

Report Near Misses

- A. A "Near Miss" is described as an unplanned incident that could have resulted in injury, property or equipment damage.
- B. All Near Misses are to be reported in the same manner as an injury.
- C. An investigation will be conducted to determine cause. The JHA for that process involved in the Near Miss will be reviewed by the foreman and /or supervisor.
- D. A report will be generated providing who, what, when, where, why, and how the Near Miss occurred.
- E. The near miss report must be sent to BEI Construction management within 24 hours of the occurrence.

Requirements for Return to Work

- A. The supervisor must receive a return-to-work slip from the doctor.
- B. All employees seeking to return to work must be approved by BEI Construction management.
- C. If the return-to-work slip states, "modified duty," assign the employee tasks that will meet the work restrictions indicated.
- D. If an injured employee wants to return to work without an okay from the doctor do not under any circumstances put them back to work. No exceptions.

Witness Statement Report of Injury or Incident

Instructions: Report what you observed at the time the injury/illness, incident, or near miss occurred.

IMPORTANT: Return to your supervisor within 24 hours.

Name: _____ Last 4 of SS #: _____ Emp. #:_____
Address: ____ Location: ___ Project #: ____ Supervisor: _____
Name of injured/ill person (as applicable): _____

Where did the incident or exposure occur?

What was the injured person doing when injured? (Be specific; identify tools, equipment, material, etc.)

How did the incident or exposure occur? (Tell what and how it happened)

Date of Injury/Incident? Day of Week: _____ Date: _____

Time of Injury? ____ A.M. ____ P.M.

Witness Signature:______Date:_____

Employee Statement Report of Injury or Incident

Instructions: Report what happened at the time the injury/illness, incident, or near miss occurred.

IMPORTANT: Return to your supervisor within 24 hours.

Name: _____ Last 4 of SS #: _____ Emp. #:____ Address: Job Location: _____ Project #: _____ Supervisor: _____ In your own words, describe what happened (Be specific, identify tools, equipment, material, etc.): What were you doing before the incident occurred? Where were you when the incident occurred? Were any other workers with you in the immediate area when the incident occurred? Yes □ No □ If Yes, who?_____ When did you first notice the onset of symptoms/issues?_____ What do you believe contributed to the symptoms/issues?_____ How could this incident have been prevented?_____ What did you do immediately following the incident?_____ Date of Injury/Incident? Day of Week: ______Date: _____ Time of Injury?______A.M.______P.M. Employee Signature: ______ Date: _____

Incident Investigation Report (Page 1 of 3)

Instructions:

Complete this form as soon as possible after an incident that results in serious injury or illness. (Optional: Use to investigate a minor injury or Near Miss that could have resulted in a serious injury or illness.)

'	Death ☐ Lost Time Property Damage	☐ Dr. Visit Only	☐ First Aid	d Only	☐ Near Miss	
Day / M T V	V TH F S SU	This report is m	ade by:			
Date of incident:		☐ Employee	☐ Super	visor	□ Team	☐ Final Report
First reported to:			Date First Reported:			
Step 1: Injured emplo	yee (complete this part	for each injure	d employee)			
Name		Sex:		Age		
		□ Male	□ Female			
Department:		Job title and tasks at time of incident (laborer, operator, etc.):				
Front	Back	Nature of injury one):	(most serious		This employ	ree works:
		☐ Abrasion, scrapes ☐ Amputation ☐ Broken bone				ar full time ar part time
					☐ Seaso	nal
		☐ Bruise ☐ Burn (heat) ☐ Burn (chemical) ☐ Concussion (to the head)			·	is employer:
// //	// //					
		☐ Crushing ☐ Cut, lace ☐ Hernia	ration, puncture	е	Time at this	job:
Tull I has	Fred 1 how	□ Illness	I t = ' I)			
) A (\ \ \	☐ Shock (e ☐ Sprain/St	rain			
		☐ Particulat				
		□ Other:		_		
					Time in this	trade:

	Step 2: Describ	e the Ir	ncident (Page 2	of 3)			
Exact Location of the Incident: Job Name & N			er:	Exac	ct Time:		
What Part of Employee	's Workday? ☐ Ente	ering or	Leaving Work		Ooing Normal Work Activities		
☐ During Meal Period	☐ During Break ☐ World	king Ov	rertime	ner:			
Names/Contact Numbe	rs of Witnesses (if any):						
Number of Written Witness Stater Attachments:			Photographs:		Maps/Drawings:		
What Personal Protective	⊥ ve Equipment was Being	Used ((if any)?				
Describe Step by Step Tools, Materials or Othe		e Incide	nt. Include Nam	nes of a	any Machines, Parts, Objects,		
	Step 3: Why I	Did the	Incident Happe	en?			
-	nditions: (check all that		-	- '	check all that apply)		
apply)			perating Without perating at Unsa				
☐ Inadequate Guard☐ Unguarded Hazard					at has Power to It		
☐ Safety Device is Defe	ective		aking a Safety D				
☐ Tool or Equipment is			sing Defective E		•		
☐ Workstation Layout		□ U	sing Equipment	in an l	Jnapproved Way		
☐ Lighting					ement / Material Handling		
☐ Ventilation			aking an Unsafe	Position	☐ Taking an Unsafe Position or Posture		
			_		☐ Distraction, Teasing, Horseplay		
☐ Lack of Needed Pers	sonal Protective		istraction, Teasir	ng, Ho			
Equipment			straction, Teasinallure to Wear Pe	ng, Ho ersona	al Protective Equipment		
Equipment ☐ Lack of Appropriate I		□ Di □ Fa □ Fa	istraction, Teasinal ailure to Wear Po ailure to Use the	ng, Ho ersona Availa	al Protective Equipment able Equipment / tools		
Equipment ☐ Lack of Appropriate I ☐ Unsafe Clothing	Equipment / Tools	□ Di □ Fa □ Fa	straction, Teasing allure to Wear Positive to Use the colonial of the colonial	ng, Ho ersona Availa n Polic	al Protective Equipment able Equipment / tools by(ies) or Procedure(s)		
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Injury and Incident Report (Page 3 of 3)
Why Did the Unsafe Acts Occur?
· · · · · · · · · · · · · · · · · · ·
Is there a Reward (such as "the job can be done more quickly" or "the product is less likely to be damaged") that may have Encouraged the Unsafe Conditions or Acts?
☐ Yes ☐ No
If Yes, Describe:
Were the Unsafe Acts or Conditions Reported Prior to the Incident? ☐ Yes ☐ No
If Yes, Describe:
Have There Been Similar Incidents or Near Misses Prior to the Incident? ☐ Yes ☐ No If Yes, Describe:
<u> </u>

7.0 Training and Instruction

Orientation and Training

- A. At the time of new hire, all new personnel will be given a New Employee Safety Orientation before their initial assignment to work. The new employee will receive a copy of the IIPP, additional copies are available on each project and from each project foreman for employee review.
- B. General training and safety awareness training on topics applying to our industry will be provided. Safety training is provided to ALL employees including but not limited to: Hazard Communication, Injury Illness Prevention Program, Emergency Action and Response, Fire Prevention, Fall Protection, Personal Protective Equipment, and General Workplace Hazard Identification.
- C. Specific job training will be provided by the employee's foreman or supervisor which will include site/project specific safe work practices and procedures such as: Fall Protection, Forklift Safety Training, Ladder Safety, lock out/ Tag out Training, Use of Tools and Equipment, etc.
- D. Specialized training will be provided at the appropriate times throughout the tenure of the employee.

 The following outlines the critical times when such training is required by BEI Construction:
 - 1. Initially upon hire if a new employee. This will occur as part of the Orientation Program. This will include the general and job specific hazards that the employee may be exposed.
 - 2. Refresher training will be conducted as needed or required by Federal or State Regulations.
 - 3. Individual, group, or all employees training will be given whenever there is an introduction of a new potential hazard, new equipment, or new procedure that needs to be communicated to the employees.
 - 4. Employees transferring to a new position or employees returning to a previous job after an extended absence will be trained in the job position requirement similar to the new employee training requirements.
 - 5. Training will be given to affected employees whenever BEI Construction becomes aware of employee(s) failing to understand how to perform their work tasks safely.

E. Supervisor Training

- All supervisors will be trained to provide instruction and explanation to all new employees on BEI Construction' IIPP and Code of Safe Practices, as well as all other safety programs that would apply to their scope of work.
- 2. All Superintendents and Foreman should be trained in the OSHA 30-Hour Outreach class for construction. Supervisors will receive other safety training as applicable to the work activities.
- 3. Supervisors will be trained in proper jobsite inspection and documentation.
- 4. Supervisors will be trained in proper incident or injury and near-miss investigation procedures, and in documentation of all incidents.

8.0 Drug & Alcohol Policy Statement

BEI Construction is committed to maintaining a safe work environment, free from intoxicants, illegal drugs and substance abuse. We believe that we have an obligation to take all necessary steps to provide a safe work environment, which is free from known hazards.

Accordingly, BEI Construction has adopted the following Policy: ☐ BEI Construction strictly prohibits the possession, use, sale, distribution or transfer of drugs, narcotics, intoxicants or other illegal substance or drug paraphernalia while performing work for the company or while on company property, including vehicles. Company property, for the purpose of this policy, includes all property owned, leased, used or under the control of BEI Construction, such as offices, installations, parking lots, vehicles and job sites of a client. All employees must comply with this policy on company property, whether they are on duty or not. An employee may not report to work or remain on duty impaired or under the influence of drugs or intoxicants. ☐ An employee, who uses, possesses, sells, or provides illegal drugs, controlled substances, or intoxicants off-duty may be subject to discipline or discharge if the off-duty conduct adversely affects job performance or has a negative impact on the safety of company personnel or property. ☐ All employees are required to notify the company of any criminal drug statute conviction within five days after the conviction. Where the conviction is based on a workplace violation or otherwise relates to employee's ability to perform his or her job safely or efficiently, the employee will be subject to discipline or termination for either a first offence or a subsequent offence. ☐ BEI Construction will comply with any drug and alcohol testing requirements mandated by a Project, Owner, or General Contractor. A positive test result or refusal to take the test by a BEI Construction

Note: BEI Construction may request and ultimately require all subcontractors to implement a drug program, at least as stringent as our program, to participate with us in the effort to provide a safe and drug-free workplace.

employee will result in discipline up to and including immediate termination.

9.0 Code of Safe Practices

General Safety Rules

- 1. All persons shall follow these safe practices and policies, render every possible aid to safe operations, and report all unsafe conditions or practices to their supervisor.
- 2. All employees are responsible for not working in any situation or condition that they feel is unsafe.
- 3. Employees are to immediately report all unsafe conditions to their supervisor.
- 4. Foremen shall enforce safety policies and verify employees' observance of rules and regulations and will take action as necessary to ensure safety at work.
- 5. Safety "Toolbox" meetings must be held a minimum of weekly. All employees shall be present for all regularly scheduled safety meetings and must sign attendance sheet.
- 6. If you are injured on the job, you are required to immediately report the type and severity of your injury to your supervisor.
- 7. Always wear clothes that are suited to your job or task being performed. Never wear dangling or loose clothing or jewelry around moving tools or equipment. Hoop type earrings are not allowed while working. Footwear must be sturdy, leather work boots in good enough condition to provide adequate protection and traction for the work conditions.
- 8. The use of radios, tape players or other electronic music devices is prohibited.
- 9. No pets or other animals are allowed to be brought on site by any employee.
- 10. No children are allowed on the job site.
- 11. Required PPE, such as hard hats, safety glasses, gloves and reflective vests shall be worn at all times.
- 12. Alcohol and Drugs WILL NOT BE TOLERATED. If you are found to be under the influence of alcohol or non-prescription drugs (prescription drugs that can alter your ability to work safely must be preapproved) during working hours, you will be terminated immediately.
- 13. All work shall be pre-planned and supervised to prevent injuries in the handling of materials and equipment. Remember to "PLAN THE WORK AND WORK THE PLAN!"
- 14. No one shall knowingly be permitted or required to work if their ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury.
- 15. Horseplay, running, fighting or any activity that may result in an injury or incident will not be tolerated and will subject to immediate discipline.
- 16. Keep work areas clean at all times. A safe project is a clean project. Keep all walkways, ramps, runways, stairwells and access/egress/designated passageways clear of debris and freely accessible.

Injury and Incident Reporting & Investigation

- 1. In order to provide prompt and adequate medical attention it is very important that you report all jobrelated injuries and incidents to your supervisor immediately.
- 2. If you are injured, you must notify your supervisor before seeking medical attention it at all possible.
- A post injury or incident drug and alcohol test may be required for a work-related injury, accident or incident beyond first aid.
- 4. If you are involved in or witness an incident or injury in the workplace, please cooperate with your supervisor by helping determine what caused the incident or injury. Your observations and feedback are critical in helping BEI Construction prevent a similar occurrence.
- 5. All incidents and near misses shall be reported immediately to your supervisor for investigation and corrective measures, even if no injury or damage resulted.
- 6. Supervisors are responsible for submitting reports on injuries, illnesses or incidents and near misses to their Superintendent within 24 hours.

Hazardous/Flammable/Combustible Materials

- 1. Follow the instructions on the label and in the corresponding SDS for each chemical product such as lubricants and adhesives that you will use in your workplace.
- Use personal protective clothing or equipment such as neoprene gloves, rubber boots, shoe covers, rubber aprons, and protective eyewear, when using chemicals labeled "Flammable," "Corrosive," "Caustic" or "Poisonous."
- 3. Always use your chemical goggles and the face shield when handling chemicals labeled "Corrosive" or "Caustic".
- 4. Do not use protective clothing or equipment that has split seams, pin holes, cuts, tears, or other visible signs of damage.
- 5. Properly dispose of gloves used for chemical handling after use. Always wash your hands after removing the gloves.
- 6. Smoking is only allowed in designated areas.
- 7. Combustible scrap, debris and waste materials (oily rags, etc.) must be stored in covered metal receptacles and removed from the worksite promptly.
- 8. Containers and tanks must meet OSHA regulations for the storage and handling of flammable and combustible liquids.
- 9. Oxygen and acetylene tanks shall be separated from fuel gas cylinders or combustible materials a minimum of 20 feet or by non-combustible barrier at least 5 feet high and having a fire-resistance rating no less than one-half hour.
- 10. Flammable liquids must be kept in closed containers when not in use.
- 11. Bulk drums of flammable liquids must be grounded and bonded to containers during dispensing.
- 12. Use a rubber cradle when transporting unpackaged glass bottles of chemicals.

13. Do not store chemical containers labeled "Oxidizer" with containers labeled "Corrosive" or "Caustic."

Hand & Portable Power Tools

- 1. Safety glasses or goggles are required for eye protection when using hand and power tools. In addition, face shields are required when grinding, chipping, drilling/shooting (with powder actuated tool) overhead or using a chain or cutoff saw.
- 2. Inspect your tools prior to the start of the job. Damaged or defective tools shall not be used.
- 3. Do not remove, disengage, or disable any guard. Removing or rendering guards inoperative may be grounds for dismissal or other disciplinary action.
- 4. Power tools should never be raised or lowered by their cords or hoses.
- 5. All electrical equipment shall be grounded or double insulated, AND a GFCI shall be used. Any questions contact your supervisor immediately.
- 6. On pneumatic tools (air tools) an approved safety check valve must be installed at the manifold or outlet of each supply line.
- 7. All air hose connections shall be secured with wire clips or whip lines.
- 8. Safety clips or retainers must be installed on all pneumatic tools to prevent the tool's accidental disengagement. When not in hand, all pneumatic tools are to be disconnected from the air supply.
- 9. Use tied off containers to keep tools from falling off elevated work platforms.
- 10. Carry all sharp tools in a sheath or holster.
- 11. Tag worn, damaged, or defective tools "Out of Service" and do not use them.
- 12. Do not use a tool if its handle has splinters, burrs, cracks, splits or if the head of the tool is loose.
- 13. When handing a tool to another person, direct sharp points and cutting edges away from yourself and the other person.
- 14. When using knives, carpet shears, or other cutting tools, cut in a direction away from your body.
- 15. Do not carry sharp or pointed hand tools such as screwdrivers, scrapers, or carpet snips in your pocket unless the tool or your pocket is sheathed.
- 16. Do not perform "makeshift" repairs to your tools.
- 17. Do not carry tools in your hand when you are climbing. Carry tools in tool belts or hoist the tools to the work area using a hand line.
- 18. Do not throw tools from one location to another, from one employee to another, or from elevated platforms.
- 19. Transport hand tools only in toolboxes or tool belts. Do not carry tools in your clothing.

Files

- 1. Do not use a file as a pry bar, hammer, screwdriver or chisel.
- 2. When using a file, grasp the handle in one hand and the toe of the file in the other.
- 3. Do not hammer in a file.

Hammers

- 1. Use a claw hammer for pulling nails.
- 2. Do not strike nails or other objects with "cheek" of the hammer.
- 3. Do not strike a hardened steel surface, such as a cold chisel, with claw hammer.
- 4. Do not strike one hammer against another hammer,
- 5. Do not use a hammer if your hands are oily, greasy, or wet.
- 6. Do not use a hammer as a wedge or a pry bar, or for pulling large spikes.
- 7. Do not use hammers that have mushroomed heads.

Screwdrivers

- 1. Always match the size and type of screwdriver blade to fit the head of the screw.
- 2. Do not hold the work piece against your body while using a screwdriver.
- 3. Do not put your fingers near the blade of the screwdriver when tightening a screw.
- 4. Use a drill, nail, or an awl to make a starting hole for screws.
- 5. Do not force a screwdriver by using a hammer or pliers on it.
- 6. Do not use a screwdriver as a punch, chisel, pry bar or nail puller.
- 7. Do not carry a screwdriver in your pocket.
- 8. Do not use a screwdriver if your hands are wet, oily, or greasy.

Pliers

- 1. Do not use pliers as a wrench or a hammer.
- 2. Do not attempt to force pliers by using a hammer on them.
- 3. Do not slip a pipe over the handles of pliers to increase leverage.
- 4. Use properly rated/test insulated hand tools for any approved energized electrical work.
- 5. Do not use pliers that are cracked, broken, or sprung.

Pneumatic Stapler

- 1. Do not discharge stapler unless it is touching the material and/or surface being stapled.
- 2. Keep your hand from under or behind material being stapled.
- 3. If something or someone distracts you from your work, discontinue the stapling operation until it is safe to resume.

Snips

- 1. Wear your work gloves when cutting materials with snips.
- 2. Do not use straight cut snips to cut curves.
- 3. Keep the blade aligned by tightening the nut and bolt on the snips.
- 4. Do not use snips as a hammer, screwdriver or pry bar.
- 5. Lock snips by engaging locking clip after use.

Toolboxes/Chests/Cabinets

- 1. Use the handle when opening and closing a drawer or door of a toolbox, chest, or cabinet.
- 2. Tape over or file off sharp edges on toolboxes, chests or cabinets.
- 3. Do not stand on toolboxes, chests or cabinets to gain extra height.
- 4. Do not open more than one drawer of a toolbox at a time.
- 5. Close and lock all drawers and doors before moving the tool chest to a new location.
- 6. Do not use a toolbox or chest as a workbench.
- 7. Do not move a toolbox, chest or cabinet if it has loose tools or parts on the top.

Compressed Gas Cylinders

- 1. All compressed gas cylinders shall be capped and stored in the upright position and properly secured.
- 2. Oxygen cylinders will be stored separately from cylinder containing flammable gas (i.e. acetylene) by a minimum distance of 20 feet or by a 5-foot high non-combustible wall.
- 3. Carts shall be used to transport cylinders.
- 4. Regulators shall be removed, and the caps installed at the end of the day or when the cylinders are not being used.

Compressors & Compressed Air

- 1. Compressed air shall not be used to clean or blow off clothing or hair.
- 2. Compressed air shall not be used for any reason other than its intended use.
- 3. Compressed air shall not be used as breathing air.

Concrete Saw Cutting

- Appropriate measures identified in the Silica Exposure Prevention Program will be utilized to reduce heat and prevent exposure to silica hazards.
- 2. Equipment must have properly functioning guards at all times.
- 3. Face, Eye and Hearing protection must be used at all times while saw cutting.
- 4. Proper protective gloves must be worn at all times.

Confined Space

A "Confined Space" is defined by Cal-OSHA as a space that exhibits all the following conditions:

- 1. Large enough to enter Is large enough and so configured that an individual can bodily enter and perform assigned work; and
- 2. Has limited or restricted means for entry or exit; and
- 3. Is not designed for continuous human occupancy.

BEI Construction will not allow any of their employees or subcontractors to enter a Confined Space without first assessing the potential hazards within the Confined Space, performing atmospheric testing, providing

a pre-job safety meeting with all affected personnel, and completing/posting a Confined Space Entry Permit. Each person required to enter a Confined Space should ensure the following:

- A. Each Confined Space shall be posted, alerting all potential entrants that it is a Confined Space, and that proper training and entry requirements must be followed prior to entry.
- B. Forced or positive ventilation is required while welding, burning, or cutting is performed in a Confined Space.
- C. At least one person outside the Confined Space shall be in communication with the workers in the Confined Space at all time. The Confined Space atmosphere must be tested by a qualified person prior to entry into a Confined Space and the results recorded on the Confined Space Entry Permit.
- D. The Confined Space shall be clean, and free of hazardous materials or chemicals.
- E. Adequate lighting will be installed as needed. Only explosion proof lighting is allowed within a Confined Space.
- F. All persons are advised on the PPE requirements for the work assignment within the Confined Space.
- G. In the event that either the attendant at the entrance, or another entrant working within the Confined Space, expresses concern for the safety of themselves or other workers, all persons in the Confined Space shall leave the Confined Space immediately. The Confined Space supervisor shall be notified, and re-entry shall not be allowed until the reasons for the concerns and the safety of all entrants is assessed and the potential hazard or real hazard is eliminated.

Demolition

- 1. All areas of demolition will be fenced off and danger signage posted to keep unwanted personnel or pedestrians from entering the area of work.
- **2.** All equipment will be operated by a competent operator and shall be inspected at the start of each day prior to any operation.
- **3.** All equipment maintenance and prestart checklists will be filled out every day, prior to any operation.
- **4.** A spotter will be used to aid equipment movement, high traffic areas and to protect the public when necessary.
- **5.** Minimum PPE such as hard hats, gloves, safety glasses and type 3 safety vests must be worn at all times.
- 6. Constant communication between equipment operators and workers must be maintained.
- The work area will require the use of water to prevent dust from being generated.
- 8. Back-up and travel alarms must be fully functional at all times on all equipment.
- **9.** Housekeeping is of the utmost importance, especially on a demolition project. All demolition material must be kept in organized piles and out of walkways to mitigate slip/trip hazards.
- **10.** Any demolition work that involves the dropping of material must be cordoned off with danger tape and all unnecessary personnel kept a safe distance away.

11. Any work that includes the demolition of a building/structure requires that the building/structure be inspected prior to demolition activities, daily, to ensure no personnel or vagrants have occupied the building.

Driving & Vehicle Maintenance

All company vehicles shall be inspected prior to use to ensure that the vehicle is in safe condition, and to ensure that all safety equipment is in safe operation such as: fire extinguisher, first aid kit, incident investigation kit including camera, insurance information and the vehicle has a spare tire and jack. All deficiencies shall be corrected prior to use.

- A. Only authorized persons are allowed to operate a vehicle owned/leased by BEI Construction.
- B. The parking brake must be set whenever the vehicle is parked and left unattended with keys removed.
- C. Cell phones are not to be used while driving without hands free devices.
- D. Texting shall not be permitted while driving.
- E. Seat belts shall be worn by all personnel operating or riding in a company vehicle; this includes on the job site.

Electrical

- All temporary electrical equipment such as extension cords, used on the jobsite shall be tested by an approved testing laboratory for its specific application. Proof of UL testing is required on all equipment. If the tag is removed or altered for any reason, the electrical equipment shall be removed from service.
- 2. All electrical tools and equipment must be grounded or double insulated.
- 3. Ground Fault Circuit Interrupters (GFCI) shall be used on all hand portable power tools.
- 4. Extension and temporary power cords must be designed for hard or extra-hard usage and be grounded
- 5. Damaged or defective electrical tools or electrical extension cords shall be removed from service.

 An electrical cord is considered damaged and shall be removed from service and destroyed if the grounding leg is cut or removed from the electrical connection.
- 6. Covers or barriers must be installed on boxes, fittings, and enclosures. Report all deficiencies immediately to your supervisor.

For additional information on electrical equipment refer to the BEI Construction Safety Manual.

Emergency Response Plan

 Employees who are not trained and certified to provide emergency medical assistance are not required to respond to medical emergencies. Should employees choose to respond to such emergencies, it is on a "Good Samaritan" basis. In case of serious injury, dial "911" or local

- Emergency Medical Services number for that county or otherwise seek the immediate assistance of trained medical personnel.
- 2. Employees are required to familiarize themselves with the location of the posted emergency telephone numbers for police, fire and medical assistance. Employees will be trained in the content of the company <u>Emergency Response Plan</u> prior to starting work.
- 3. In the case of an injury, notify other workers in the area that you need assistance. Protect the injured employee from further injury.
- 4. Inform supervisory personnel and/or the BEI Construction office of the nature of the emergency as soon as is possible.
- 5. Before you dial "911" you should be sure that you can readily identify the location where the emergency has occurred.
- 6. A first aid kit will be made available (check with your supervisor as to location) on each job.
- 7. Emergency evacuation: in case of fire or other emergency, all employees will meet at a predesignated point. The supervisor will verify that all employees are accounted for.
- 8. Any changes in emergency procedures will be discussed during regular safety meetings or as required.

Equipment/Machinery

- 1. Operate machinery with all guards in place. Tampering with safety devices is cause for immediate disciplinary action (i.e. pinning back saw guards, safety springs in nail guns).
- 2. Do not operate any machine you are not familiar with; only those persons properly trained and authorized may operate equipment.
- Machines must never be cleaned, adjusted or repaired until after the machine is turned off at the power source by either unplugging or using lock out tag out and verifying zero energy exists, before starting work.
- 4. Any defects in materials, machinery, tools or equipment must be reported immediately to a supervisor.
- 5. Do not leave tools, materials or other objects on the floor, which might cause others to trip and fall.

Fall Protection

- BEI Construction requires its employees and subcontractors to adhere to our Company Fall Protection Program requirements of:
 - A. 100% tie off requirement when working 6 feet above ground surface, floor or water, around excavations 6' or deeper, or within six feet from a fall hazard such as a leading edge. Failure to comply will result in disciplinary action up to and including termination of employment, and
 - B. No employee shall use or be required to use any fall protection equipment without first being

- trained on the safe use of said equipment.
- C. All personal fall arrest, personal fall restraint and positioning device systems shall be inspected by the employee prior to use. Any defective equipment shall be removed from service immediately.
- D. Lifeline and anchorages shall be capable of supporting a minimum dead weight of 5,000 pounds.
- E. Body Belts are not allowed to be used for any reason on any BEI Construction work site.
- F. Fall protection equipment shall be used for its intended use only. Belts, harnesses, lanyards, and lifelines shall not be used as lifting devices.

Fire Protection and Prevention

- 1. Good housekeeping is the first rule of fire prevention.
- 2. Oily rags, paper, shavings, trim, pallets, insulation, scrap wood and defective slings, wire rope, and other materials shall be disposed of properly or stacked neatly for removal.
- 3. Flammable liquids shall be kept to a minimum and stored in approved container.
- 4. Ensure that all fire extinguishers and other firefighting equipment is ready for use. Any defective or discharged fire extinguisher shall be removed from service and replaced immediately.
- 5. Only approved solvents shall be used for cleaning and degreasing.
- 6. Prior to any work that creates sparks or ignition sources, check your area to ensure that all combustible or flammable material is removed.
- 7. Do not attempt to fight a fire unless you have been trained and you feel confident that you can bring it under control.
- 8. Report all fires no matter how small to your supervisor immediately.
- 9. Fire extinguishers or similar firefighting equipment should be located within 75' of operations at all times.

First Aid & First Aid Stations

- All BEI Construction employees are instructed on where to find information on First Aid and where
 to receive medical treatment during their new hire orientation, upon reassignment to a new job
 location, and periodically during the weekly toolbox safety meetings.
- 2. Medical supplies and information are located in the BEI Construction job site office. If you have any questions, contact your supervisor immediately.
- 3. Prior to the start of any project, know where the first aid kit is located, and where to go if medical assistance is needed.
- 4. Report all injuries immediately, no matter how minor to your supervisor. He or she will assist you with first aid if necessary.
- 5. Notify your supervisor or field office prior to leaving the jobsite for any reason of any injury or illness whether work related or not.

- 6. In the event of an injury, do not move the injured person unless it is necessary to prevent further injury. Contact your supervisor immediately for assistance.
- 7. Prior to returning to work after a disabling injury or illness (work related or not) you must present a release or medical clearance from your attending physician to your supervisor.
- 8. If you have sustained an injury or illness and your physician has determined that you are to be placed on modified or restricted duty, inform your supervisor.

Forklifts

- 1. Only authorized, trained personnel are allowed to operate company equipment including forklifts.
- Do not loan or allow another contractor to use BEI Construction rented/owned forklifts or other company equipment without authorization from the project Superintendent.
- 3. Inspect all BEI Construction equipment including forklifts priors to use. Ensure that the back-up alarm is in working condition. Report any deficiencies to your supervisor.
- 4. Seat belts shall be worn any time that the forklift or industrial truck is in operation.
- 5. No riders shall be permitted
- 6. Do not work, walk or pass under an elevated load.
- 7. Drive slowly, going up or down a grade or on uneven surface.
- 8. Carry the load as low as possible, use a spotter if you cannot see around or over the load.
- 9. Do not overload Know the load weights and the capacity of your forklift.
- Watch for overhead hazards like overhead power lines and keep a minimum approach distance of at least 10Ft.

Fueling

- 1. Ensure that all machinery is turned off prior to the start of the re-fueling.
- Ensure that a fire extinguisher is available. Check the size and chemical type to ensure that you have the right one. If you have a question concerning the fire extinguisher, contact your supervisor prior to re-fueling the equipment.
- 3. Avoid fuel spills; clean up all fuel spills immediately.
- 4. Implement all project specific requirements and ensure that all environmental controls are in place prior to refueling.

Hazard Communication

Every employee has the *Right to Know* what chemicals or hazardous materials are being used in his/her workplace and are to be trained on their safe use.

- 1. SDS for each chemical to which you will be exposed shall be available for your review.
- 2. Training will be provided before you will be directed to use any hazardous substance. The training will include information needed to determine what precautions and PPE are needed to perform the task safely.

- 3. If you have any questions about the hazards or safety precautions to take, contact your supervisor immediately and prior to using the hazardous substance.
- 4. All containers shall be labeled as to their contents. This includes smaller secondary containers such as spray bottles.
- 5. All unmarked, unlabeled containers both large primary and small secondary containers shall be disposed of as hazardous waste.
- 6. DO NOT SMELL or TASTE ay substance to try and make an identification read the label. This unsafe action could cause permanent injury.

Hearing Protection – Noise

- 1. How do I know when to wear Hearing Protection?
- 2. Rule of Thumb If you have to raise your voice when talking to another person at approximately 3 feet or arm's length you should wear hearing protection.
- 3. Hearing protection consists of earplugs or earmuffs. The use of cotton or other material for hearing protection is unsafe and prohibited.
- 4. All employees are required to use hearing protective equipment when the ambient noise is 85 decibels (dB) or greater and in all areas designated as a high noise area.

Housekeeping

- 1. Housekeeping is to be emphasized at all BEI Construction work sites.
- 2. Scrap materials and rubbish are a fire and potential hazard. Do not allow excess material and scrap build up in work areas.
- 3. Do not leave tools and materials where they can create a hazard for others. Put them in the gang box or return them to the tool room.
- 4. Toilets and drinking water containers are provided for convenience and comfort. Please help keep them clean and sanitary. Report any problems to a supervisor immediately.
- 5. Keep all stairways, ladder landing, ramps, scaffolds, platforms, walkways and work areas free from material and debris.

Ladders

- 1. All ladders used by BEI Construction and its subcontractors will be certified ANSI Type 1A.
- 2. Job made ladders must be constructed and conform to the established standards.
- 3. All damaged ladders shall be removed from service and shall NOT be used.
- 4. All straight ladders and extension ladders shall be secured at the top.
- 5. The base of extension ladders shall be set back a safe distance. BEI Construction enforces the 1:4 rule, that is the base of the ladder is set back one foot for every four feet of height.
- 6. Face the ladder at all times when ascending or descending.
- 7. Do not carry objects up a ladder. Keep both hands free for climbing.

- 8. Do not use metal ladders around electrical exposures.
- 9. Folding ladders are NOT to be used as straight ladders.
- 10. Never stand on the top 2 steps of a folding ladder.

Lockout - Tagout (LOTO)

- 1. All sources of energy such as electrical, mechanical, hydraulic, pneumatic, chemical and thermal are considered to be part of the BEI Construction Energy Control Program (LOTO).
- 2. Only authorized persons who have completed training on the LOTO program are to perform any duties requiring LOTO.
- 3. Each employee involved in Lockout or Tagout procedures will be provided with their own personal lock. Each employee shall isolate all potential energy sources by installing their lock.
- 4. At no time shall any BEI Construction employee or any of their subcontractors remove locks or tags from potential energy sources other than your own lock or tag.
- 5. BEI Construction employees are prohibited from working on or near any electrical equipment, lines, mechanical equipment, or pressure systems which could be energized or activated, or on vessels, piping systems or equipment containing hazardous materials which could be activated or released without first implementing the BEI Construction Lockout Tagout procedures.

Machine Guarding

- 1. Tools equipped with shields or guards shall not be operated unless the proper guard or shield is in place.
- 2. All pulleys, belts, drums, and other exposed rotating shafts shall be guarded at all times with the exception of maintenance and service at which time the equipment or prime mover shall be locked out per the BEI Construction Lockout Tagout Procedure.
- 3. No equipment shall be allowed to be operated with an exposed pulley or belt system.
- 4. All equipment shall have the required guard system per the manufacturer recommendations.

Manlifts & Aerial Platforms

- 1. Only authorized and trained personnel shall operate an aerial device or an elevated work platform.
- 2. Never exceed the load limits set for manlifts and aerial platforms. Consult the operator's manual for load limits.
- Never sit, climb or sit on the edge of the basket or platform, or use planks, ladders or other devices to gain greater height. Failure to comply with this policy may result in disciplinary action up to and including termination.
- 4. Never use Manlifts or aerial platforms during high winds.
- 5. Lift controls shall be tested in accordance with the manufacturer's recommendations and/or

- instructions prior to use to determine safe operating conditions. If the equipment is defective, do not use the equipment. Contact your supervisor immediately.
- Any employee, in an elevated aerial device shall be secured to the boom, basket or tub through
 the use of a full body harness and lanyard per the manufacturer's recommendations and BEI
 Construction' Fall Protection Program.

Material Handling - Storage & Disposal

- 1. All material must be properly stacked and secured to prevent slipping, falling or collapse.
- 2. Aisles, stairs, and passageways must be kept clear to allow safe movement of employees and equipment and provide access during emergencies.
- 3. Use proper techniques when handling material:
 - · Get close to the load
 - Keep your back straight
 - Lift gradually, using your legs (don't jerk)
 - Assess the load, test it for weight, and if it is too heavy or awkward, get help.
 - Pipe, conduit and bar stock must be stored in racks or stacked and blocked to prevent movement.
 - Never stack material where it could become a tripping hazard.
 - Nails must be removed or bent over at the time of their removal. Never stack lumber with protruding nails.
 - Separate all materials prior to disposal. Hazardous or contaminated material shall not be disposed as normal trash.
 - Dispose oily rags and chemicals in a container designed for that purpose. If unsure, contact your supervisor.

Personal Protective Equipment (PPE)

- 1. BEI Construction will make every effort to eliminate all hazards in your workplace. If elimination is not possible through engineering controls, administrative controls will be implemented to ensure the safety of all persons working at the worksite.
- 2. Administrative controls include a process that will limit the number of persons working in the area, the amount of time in the area, exposure to the hazard, and/or contact with a potential hazard.
- After an assessment of the hazard is completed and it is determined that the hazard cannon be controlled and work still needs to be performed in the area, PPE will be issued to each person working in the area.
- 4. The supervisor will determine the required PPE needed for the task and the supervisor is responsible for ensuring that each person under his/her charge wears the required PPE.
- 5. The following PPE must be worn when working on BEI Construction projects:

- Company hard hat.
- ANSI Approved Safety glasses with side shields.
- Orange or lime green vests or highly visible shirts when working in high vehicle traffic areas. Where required (such as for road flagging operations), vests worn must be labeled ANSI Class 2 or 3.
- Shirt with sleeves (no tank tops or sleeveless shirts).
- Work boots NO tennis shoes or sandals.
- 6. The following safety equipment must be worn as required:
 - Hearing protection ear plugs or earmuffs.
 - Chaps when using a chain or cutoff saw.
 - Face shield when grinding, chipping, drilling/shooting (with powder actuated tool) or using a chainsaw or cutoff saw.
 - Clear goggles or gasketed safety glasses shall be worn under the face shield when chipping, drilling/shooting (with powder actuated tool) overhead or using a chain or cutoff saw.
 - Tinted goggles or welding hood when welding, cutting or brazing.
 - Leathers when welding, cutting or brazing.
 - Respirators when dust or other respiratory hazards require it.
 - Full body harness when working over 6 feet in height (100% tie off requirement).
 - Gloves when handling rough or sharp materials or when handling chemicals. Voltage rated, and tested gloves are required for approved energized electrical work and verification of zero voltage.
 - Other PPE such as Tyvek or paper coveralls shall be worn as the need arises.
 - If respiratory protective equipment is required, only employees that have received training, received a medical exam, and have been fit-tested with the required respirator are allowed to use this equipment.
 - If you are assigned to use a respirator and you have not received the required medical exam, training and fit test, inform your supervisor. DO NOT use a respirator until you have received the required testing.
 - Using a respirator without the proper testing could result in personal injury or even death.
 - Toe guards and metatarsal guards must be worn when using jackhammers and compaction equipment.
 - Long sleeves or Kevlar arm guards when reaching into locations with sharp exposed edges.

Respiratory Protection

1. Only trained, qualified, and medically examined personnel are allowed to use ANY type of respirator protection, including particulate filtering face pieces (dust masks that carry an NR rating).

- 2. Your supervisor is responsible for determining what hazards you will encounter and what respiratory protection is required.
- 3. Persons with facial hair, such as a beard, mustache, and/or long sideburns, shall not be allowed to wear a respirator due to the inability to ensure a tight seal on the facepiece.
- 4. Consult the SDS for the hazard to determine the proper respirator selection.
- 5. Never use a respirator (negative pressure) in an oxygen deficient atmosphere. Oxygen deficient atmospheres require either SCBA or supplied air equipment.
- 6. BEI Construction does not allow entry into any space that has been determined to be immediately dangerous to life or health (IDLH).
- 7. Voluntary use of filtering face-pieces (i.e. dust masks with two straps) will require employees to review and sign a Voluntary Respirator Acknowledgement form. A copy of this form is available from the Corporate Office.
- 8. Voluntary use of a tight-fitting respirator will require medical evaluation, training, fit testing, and completion of a Voluntary Respirator Acknowledgement form. A copy of this form is available from the Corporate Office.

Trench & Excavations

- 1. All walkways over the trench or excavations shall have standard guardrails.
- 2. Excavations or trenches that could undermine existing footings, structures, trees, sidewalks, etc., must be supported.
- 3. A trench can be a "Confined Space" if there IS or there IS A POTENTIAL for a contaminated atmosphere. Refer to "Confined Space" for additional information.
- 4. Always locate underground utilities or services within your trench or excavation before you start to excavate. Contact the regional notification center (i.e. 811) 48 hours before you intend to dig.
- 5. All trenches and excavations shall be barricaded.

Vehicle Operations

- 1. Only authorized employees are permitted to operate company vehicles.
- 2. Company vehicles are to be used for company business ONLY unless prior approval has been authorized.
- 3. Be careful when you drive, drive defensively and obey ALL traffic and highway laws.
- 4. Always wear your seatbelt. This includes the passenger.
- 5. Report all incidents as soon as possible to your supervisor. Inspect your vehicle and report any defects.
- 6. If your drivers' license expires or is suspended, DO NOT drive a company vehicle. Notify your supervisor immediately.

Welding, Cutting & Brazing

- 1. Make sure welding equipment is installed properly, grounded and in good working condition.
- Wear the proper PPE for the task at hand including eye, face, hearing, clothing and respiratory protection as required.
- 3. Keep your work area clean and free of hazards. Make sure that no flammable or combustible materials are in or near your work area.
- 4. Handle all compressed gas cylinders with extreme care. Install caps when not in use. Secure cylinders to the cart, wall or other structural support. When empty, return to the storage area.
- 5. Do not cut or weld in a Confined Space unless special precautions such as additional ventilation are provided in accordance with the BEI Construction Confined Space Program.
- 6. Use welding curtains or other means to shield the welding arc in areas where other workers work or may pass.
- 7. Never use oxygen to blow off cloths or clean slag from the weld and never use oxygen as ventilation or purge.

Wildfire Smoke Protection

- 1. Employees must be protected for airborne hazards associated with wildfire smoke while working.
- 2. N95 type respirators must be provided and do not require compliance to the respirator requirements when:
 - a. The current Air Quality Index (AQI) for PM2.5 is 151 or greater due to wildfire smoke, regardless of the AQI for other pollutants; and
 - b. Outdoor work is performed, and you can reasonably anticipate that employees may be exposed to wildfire smoke.
- 3. Management and Supervisors are responsible for:
 - Understanding and implementing the Wildfire Protection Policy located in the Safety Manual, as required.
 - b. Identifying if harmful exposure levels exist daily.
 - c. determining employee exposure to PM2.5 for worksites covered by this regulation before each shift and periodically thereafter, as needed to protect the health of the employee.
- 4. Employees are Responsible for:
 - a. Applying the knowledge learned in training and complying with this policy as required.
 - b. Assessing their own safety and communicating concerns to their immediate supervisor as soon as possible and evacuating unsafe conditions.

Work Surfaces, Walkways & Passageways

- Make every effort to keep your work area free from tripping hazards. Scrap material, protruding nails, welding leads, hoses, extension cords and similar tripping hazards should be removed or secured in such a way to eliminate trip, slip and fall hazards.
- 2. Use barricades and guardrail systems to secure the area where a section of flooring or an open

hole exists.

- 3. All open holes where an employee could trip and/or fall shall be barricaded or covered with a covering, which is capable of withstanding the traffic in the area. A sign stating: "OPEN HOLE DO NOT REMOVE" or similar, shall be placed on the covering to warn all persons of the potential hazard. Ensure hole covers are secured in place.
- 4. Be sure that all handrails and toe boards meet the requirements and are in good repair. Any unsafe handrail or guardrail system should be reported to your supervisor immediately. Place flagging at the unsafe area to warn others of the potential hazard until the handrail or guardrail is repaired.
- 5. Do not stand on, work from or tie off your fall protection to a handrail or guardrail system. They are not designed for those purposes.
- 6. Inspect your work area to ensure that all walkways and passageways are free of hazards.

10.0 Hazard Communication Program Overview

BEI Construction has developed a Hazard Communication Program to ensure that all employees receive adequate information about the possible hazards associated with any hazardous substance they are required to use during their work activities. An overview of the Hazard Communication Program is included in this section; refer to the BEI Construction Safety Manual for the complete program.

Employee Right to Know

- A. Our Hazard Communication Program has been developed to ensure that our workers have an understanding of the substances and hazards which they will encounter during the normal course of work. Information on the "Right to Know" standard is provided to all employees during their initial Safety Orientation.
- B. This program is available for review by all employees, their legal representatives, medical providers and governmental agencies following the Right to Know standards.
- C. BEI Construction does not manufacture any hazardous substance to its knowledge and does not intend to evaluate any of the hazardous substances they purchase from suppliers and/or manufacturers. Rather we have chosen to rely upon the evaluation performed by the manufacturers and distributors of the substances to satisfy the requirements for hazard determination. This information is found in the Safety Data Sheets (SDS) obtained from each supplier of the hazardous substance.
- D. Although we only use a relatively small number of hazardous chemicals, we adhere to the full notification and training of our employees and staff. An inventory list is maintained of those materials determined to be hazardous that are typically found on and used on our project sites. The list will be updated when new materials and substances are brought into the workplace and will be reviewed periodically to ensure that all substances are properly shown.
- E. All affected employees will be provided training on the new substance or material prior to actual use of the substance.

Responsibilities

- A. The project superintendent shall ensure the requirements in this section are implemented by the employees and subcontractors under their supervision.
- B. Employees are encouraged to familiarize themselves with the SDSs for chemicals and materials in their work area.
- C. The applicable SDS sheets for a job site should be a tailgate safety training topic in the first two weeks on the job. Employees may request a copy of an SDS. The request shall be made to their supervisor. Information on hazardous chemicals used by Bei Construction Inc. will be made know to subcontractors as necessary.

Container Storage and Labeling

- A. All chemicals will be stored in their original container or an approved container. All containers shall be marked with the proper labeling requirements. Chemicals may be transferred into an unlabeled portable container intended only for the immediate use of an employee who performed the transfer. Any chemical left in the unlabeled container after work is completed must be returned to the original container, or the portable container must be labeled properly
- B. No container of hazardous substance will be released for use unless the container is correctly labeled, and the label or other form of warning is legible and readable.
- C. The label must contain the following:
 - 1. The identity of the hazardous substance
 - 2. The appropriate hazard warnings
 - 3. The name and address of the manufacturer, importer or other responsible party
- D. Portable containers used solely by the employee who has transferred the substance from a large, labeled container to smaller container must:
 - 1. Take only enough material to perform the required task, i.e., less than a qt. of paint from a 5-gallon bucket.
 - 2. Label the small container i.e., grease, alcohol, paint, etc.
 - 3. Do not leave the container unattended.
 - 4. Dispose of the unused material properly.

Safety Data Sheets (SDS)

- A. Copies of SDS for all hazardous substances to which our employees may be exposed are kept in a binder in the project office.
- B. Additional copies are maintained in the Corporate Office.
- C. SDS are available to all employees, at all times, upon request.
- D. The BEI Construction Management will oversee the maintenance of the master binder and ensure that each foreman maintains an up-to-date binder of SDS's.
- E. Each Superintendent will be responsible for reviewing all incoming SDS for new and significant health/safety information. He or she will ensure that any new information is passed on to inform the involved employees.
- F. The Superintendent is responsible for ensuring that each affected employee is provided with the training and PPE needed to perform their task safety.

Non-routine tasks

A. The superintendent shall inform employees of any special tasks or job assignments that may arise which would involve possible exposure to hazardous materials. The superintendent shall review with

the employee the safe work practices, methods of monitoring for and detecting hazardous conditions, emergency actions, and the use of any required personal protective equipment prior to the start of such tasks.

B. All reviews shall be documented by the superintendent, signed by the employee, and the documentation forwarded to the office manager for filing.

General Chemical Safety

Employees shall:

Read the Safety Data Sheet and container labels before using a chemical for the first time. Never
use substances in unlabeled containers.
Wear the appropriate personal protective equipment.
Avoid splashing or spilling the chemical when pouring from the container.
Clean up spills promptly
Keep containers closed when not using
Ensure leaking containers are repacked in approved, labeled containers or disposed of properly
Never put chemicals into containers intended for food or water storage
Always point containers away from yourself or other personnel when opening.
Consult the SDS in the event of a spill for cleanup and disposal procedures.
If contaminated with the chemical, follow the first aid instructions found on the chemical's SDS.
Always clean hands after handling chemicals

Chemical Inventory List

- A. BEI Construction will maintain a chemical inventory list comprised of hazardous chemicals known or expected to be present in our workplace.
- B. Anyone who may come into contact with any of the hazardous chemicals will have access to the Safety Data Sheet for each chemical and to be able to identify the hazardous properties associated with those chemicals and how to protect themselves from those hazards.
- C. A copy of this list will be available at all times and accessible during work hours.
- D. BEI Construction does not manufacture any chemicals and relies on the content and accuracy of the SDS supplied by the manufacturer to identify the hazards associated with chemicals.

Hazardous Chemical Inventory List

Date	Chemical Name	Use	Location	SDS on File (Yes/No)

Employee Acknowledgement Statement

Employee Statement

In case I am injured, no matter how minor, while in the course of my work with BEI Construction, I shall report this injury to my foreman or supervisor immediately.

I have received and read a copy of the BEI Constru	ction "Injury and Illness Prevention Program" and "Code
of Safe Work Practices."	
I understand the company's safety policies and protaken if I do not comply with these safety standards	ocedures as well as the disciplinary actions that will be
Employee (Print Name)	Date

Employee's Signature _____