

## **STATEMENT OF SAFETY AND HEALTH POLICY**

It is the intent of Mechworks Mechanical Contractors, Inc. to provide and maintain a place of employment free of general workplace hazards, and to be in compliance with the law, OSHA standards, and US Army Corps of Engineers Manual EM 385-1-1 (Current Edition). It will be our goal to select and hire personnel that are physically, medically and emotionally qualified for performing the duties to which they are assigned. Mechworks is committed to making available and providing all equipment, tools, personnel protective gear, supervision management and training necessary to insure the safety and health of all our employees. No employee shall be required or instructed to work in surroundings or under conditions that are unsafe or dangerous to his or her health. Each employee shall be held responsible for complying with all company and OSHA safety requirements, and preventing avoidable accidents. We also charge our employees with the task of making sound judgements and decisions based on experience and available instructional material regarding safety and health matters for themselves and their fellow employees. All aspects of safety and health, as they affect the employees and customers of Mechworks shall be considered our number one priority.

## **RESPONSIBILITIES AND LINES OF AUTHORITY**

### **The Superintendent/QC Manager/SSHO will:**

1. Establish policies and procedures for the Company Safety Program, while evaluating current policies and procedures for effectiveness.
2. Stay current on governmental regulations concerning occupational safety and health and keep Project Managers and Superintendents up-to-date.
3. Is present at all times work is in progress to conduct safety inspections, communicate with employees, and provide training and technical assistance as needed.
4. Represent MECHWORKS MECHANICAL CONTRACTORS at conferences as required by customers, Government agencies and other organizations.
5. Review all accident reports and personally investigate serious accidents. Follow-up on a regular basis all lost time accidents until injured returns to work. Maintain close liaison with Workers' Compensation Insurance carrier.
6. Review periodic Workers' Compensation loss reports and keep Management apprised of trends. Compile periodic safety statistical reports and distribute to all interested parties.
7. Serve as Corporate consultant for all employees on safety and health related issues.
8. An AHA will be developed, approved and reviewed with all involved employees & Sub-Contractors prior to commencement of work at each site for all hazardous type work. AHA's will be provided for each definable feature of the work, showing the basic contract information required. All hazards and actions along with inspection, equipment and personnel will be completed by the QC Manager on the jobsite, prior to the preparatory inspection for each DFO. This will allow each AHA to be jobsite and date specific.

### **The Project Manager will:**

1. Initiate, in conjunction with the Safety Officer, an Accident Prevention Plan for each project under his/her control.
2. Ensure that all aspects of the Corporate Safety Program and applicable regulations are in effect on the jobsite.
3. Promote hazard awareness and accident prevention during all phases of work, especially at job start-up.

4. Ensure that Superintendents are knowledgeable in applicable safety rules and regulations.
5. Ensure that Superintendents are available for required safety and health training.

**The Quality Control/Safety Manager will:**

1. Enforce the elements of the Safety Program, Accident Prevention Program, and all other applicable safety and health regulations during all phases of construction.
2. Orientate each new employee with the Company Safety Program by utilizing the New Employee Orientation Program and present site conditions.
3. Insure that all new employees receive instruction on use of ladders/ stairways and application of SDS Index of all chemicals present on site.
4. Insure that all employees use long pants, safety shoes, high visibility shirt or vest, hard hats, and safety glasses at all times when work is being performed.
5. Insure that employees wear fall protection whenever working above 6' AFF.
6. Orientate each Subcontractor and make the approved APP available for review.
7. Ensure that each subcontractor review all hazardous phases of work, and participate in the discussion of each AHA for phases of subcontracted work.
8. Conduct a group safety meeting on a weekly basis and document the findings on the appropriate Weekly Checklist Form. Topics discussed should include distributed safety talks, jobsite hazards, recent or near accidents, and Material Safety Data Sheets.
9. Perform a monthly inspection of firefighting equipment and document the results on the appropriate form.
10. Conduct a daily safety inspection of the jobsite and record any safety violation by employees or subcontractors. When a violation is found, a time shall be set for compliance, and a follow-up inspection will be made to ensure compliance.
11. Give a prompt response to all complaints, recommendations, or suggestions made by employees or subcontractors concerning job safety and health.
12. Communicate to employees and Subcontractors all new standards and procedures established by the Department of Labor and the Company as they are received from the Safety Officer.
13. Investigate all accidents in accordance with the established Accident Reporting Procedure

Policy and be responsible for completing CSIR-1.

14. Ensure that all personal protective equipment and safety devices are used as directed.
15. Inform the Safety Officer immediately once notified of a safety and health inspection by the Occupational Safety and Health Administration.

**The Employee will:**

1. Practice safe work habits and adhere to all safety policies and procedures established by the Company.
2. Report all accidents to Superintendent immediately, no matter the severity of the injury.
3. Attend and participate in weekly safety meetings.
4. Maintain a clean and safe work area.
5. Wear and use all assigned protective equipment and devices as instructed by the Superintendent.
6. Report all unsafe work conditions that may exist in the work areas, and not work in any unsafe work situation.

## **SAFETY ORIENTATION**

All employees of Mechworks Mechanical Contractors, Inc. receive a safety training orientation at the time of employment. This orientation consists of the following items and requirements:

1. Prior to starting work, employees are required to have and possess a hard hat, safety shoes, safety glasses and appropriate clothing for the work they are to perform (including gloves). All other personal protective gear and equipment will be provided by Mechworks Mechanical Contractors, Inc.
2. Read the Company Safety and Health Plan.
3. Receive training and review of the NC Hazard Communication Standard and its purpose.
4. Acknowledge location of and ability to read and interpret the Material Safety Data Sheets kept on file at the office trailer. (Supervisors will maintain copies of MSDS on site with applicable submittals).
5. Acknowledge location of EM-385-1-1 at office trailer and receive general review of the manual and its requirements. (Supervisors will be issued a copy of EM 385-1-1 (Current Edition) and maintain it on site.
6. Receive instructions on reporting accidents, emergencies and fires. (Emergency phone numbers are posted in the office trailer and on each work site).
7. Receive instructions on proper use and location of fire extinguishers & First Aid Kits
8. Receive location of primary care giver, and location and phone number of secondary caregiver.
9. Receive instructions on type and extent of medical services available on base.
10. Receive instructions on preparation of and purpose of the Activity Hazard Analysis Plan.
11. Receive instructions on Company Job Site Housekeeping Policy, Expectations and Purpose.
12. Receive general instruction on maintenance and use of company tools and equipment. Re-training to occur as workplace, duties and conditions change.
13. Receive instruction on local regulations.
14. Inform employee of his or her "Right to Know."
15. Receive a general review of Company Fall Protection Practices.
16. Receive explanation of term and names of company "Competent Persons."
17. Receive annual refresher on all of the above.
18. Each employee will receive a general lecture on the description of the company workplace requirements and what is expected of them to help maintain a safe workplace environment.

## **SAFETY & HEALTH INSPECTIONS**

- A. The Superintendent/QC Manager/SSHO will conduct daily inspections for site Safety and equipment maintenance. This inspection will be documented on the Contractor's Production Report / Contractor's QC Report and submitted the following day to the Contracting Officer's Representative. An equipment inspection checklist will be completed daily on all equipment being used for this project. Firefighting equipment will be inspected and the findings documented on a monthly basis . The daily report form will serve as the basis for documentation of deficiency tracking and corrective measures taken.
  
- B. An Activity Hazard Analysis Plan will be developed for each phase of work considered to be hazardous by the Superintendent/QC Manager and reviewed with all employees and applicable Sub-Contractors prior to the beginning of work for each phase.
  
- C. The Field Manager will review the daily inspections made by the Superintendent and will follow-up on any deficiencies found to ensure corrective actions are taken.
  
- D. The Project Manager will conduct safety inspections without notice or as requested.
  
- E. The Company Safety Officer will be called in for assistance upon request.
  
- F. If any conditions arise on the job which lead to questions about the safety of exposing workers to a particular situation, the Superintendent will contact a Certified Industrial Hygienist to determine how to deal with the situation properly. The CIH for this project would be Mr. Bruce Bornhorst, CIH # 1757.

**SAFETY AND HEALTH EXPECTATIONS,**  
**INCENTIVE PROGRAMS & COMPLIANCE**

**SAFETY PROGRAM GOALS**

**Mechworks Mechanical Contractors, Inc.** is totally committed to employee safety and loss control.

It is our intention:

- That all employees work under the safest conditions possible; and
- That we provide information, training and supervision to enable employees to perform their jobs safely.

Under the Occupational Safety and Health Act, construction industry employers must furnish each employee with a place of employment that is free from recognized hazards that are likely to cause death or serious injury. In addition, employers must comply with, and require all employees to comply with, specific standards and rules that apply to their operations. To accomplish this, employers must educate and train employees in the rules and regulations that apply to them.

The information in this General Health and Safety Plan for Construction states basic safety rules and procedures that are to be followed by all company employees. While this plan will help employees recognize and avoid obvious hazards, it is merely intended to highlight some of the fundamentals of safety. Additional plans may be required for particular areas, such as asbestos control, assured equipment grounding, confined space entry. Fire protection and prevention, hazard communication, hearing conservation, lock-out/tag-out, and respiratory protection, among others. When in doubt, employees are encouraged to contact their supervisor or the safety officer. This General Health and Safety Plan for Construction is designed to reflect company policy, but it is not intended to be a binding legal contract. Thus, this plan does not alter any employee's at-will status or grant any other legal rights to any employee.

A. Policy & OSHA Form 300

B. Mechworks Mechanical's incentive program is simple:

**“CONTINUED EMPLOYMENT MEANS SAFETY FIRST”**

C. Employees who demonstrate a lack of concern for their own safety as well as the safety of others will be terminated. Supervisors and Foremen who do not enforce compliance with the safety program will be replaced, demoted and/or receive a reduction in pay and retraining.

D. The lines of authority for safety compliance are listed in Section 4 of this plan, but the on-site Superintendent/Safety Manager is ultimately held responsible and accountable for the safety of their employees on site. The Project Manager is held accountable for the actions of all Superintendents.

## ACCIDENT REPORTING

All on the job injuries shall be reported to the superintendent immediately. After assessing the situation and severity of the injury, any on the job injury requiring first aid or medical attention will be treated as an on-site accident. The following procedures will be used:

- A. Notify emergency personnel as required.
- B. Secure the accident scene with warning tape – “DO NOT ENTER.”  
Ensure accident scene evidence is protected and undisturbed.
- C. Notify Mechworks Mechanical’s main office.
- D. Notify Contracting Officer.
- E. Prepare Accident Investigation Report giving full details of accident.
- F. Have a competent person transport employee to primary or secondary care giver as required if an ambulance is not required and insure that an Alcohol & Drug test is performed.
- G. Submit copy of Incident Report to Contracting Officer
- H. Have Mechworks Mechanical’s management notify injured employee’s next of kin as required, and complete follow-up investigation to submit all appropriate forms to the NC Industrial Commission, within five days of report of accident and notify the company workman’s compensation carrier with required information.
- E. Have Mechworks Mechanical’s Management take appropriate corrective action as required.
- F. All incidents and property damage over \$2,000.00 will be reported within four hours and on the same day.
- G. Any fatal injuries, permanent disabilities, hospitalization of three or more people, or property damage in excess of \$200,000.00 will be reported to the contracting officer immediately.

Regardless of the injury, any incident involving strain, sprains, bruises, etc., must also be reported to your immediate supervisor as soon as possible. \*Failure to report an injury properly may result in ones loss of Worker Compensation Insurance.



*The following guidelines apply to accident reporting:*

All lost time mishaps are to be reported to the contracting officer within 24 hours on the Contractor Quality Control Daily Report forms. All accidents involving EMT response will be immediately reported to the contracting officer. The contracting officer is to be notified on Form CIRS within 4 hours for major accidents and within 24 hours on all other accidents. A copy of CIRS is included in this section.

For OSHA recordable accidents, the superintendent shall conduct a comprehensive investigation and complete the Contractor Significant Incident Report (CIRS) form, and provide to the contracting officer within five (5) days of the accident. The superintendent shall also record the findings of this investigation on the appropriate reporting forms (see samples following).

The superintendent shall compile a monthly exposure report and provide to the contracting officer by the 5<sup>th</sup> of each month. This report is a compilation of man-hours worked each month for a total of all on site workers, both prime and subcontractor.

The superintendent shall provide the contracting officer with a copy of each OSHA citation and the appropriate response. The superintendent shall correct the deficiency promptly and provide written notice to the contracting officer of the corrective actions taken.

#### **FIRST AID AND EMERGENCY MEDICAL PROGRAM**

First aid kits, to meet the needs of the job based on anticipated hazards as well as total number of employees, will be on site and maintained during all contracts. A person or persons qualified to provide the necessary level of expertise will be on site. *Mechworks Mechanical Contractors, Inc.* will:

- A. Identify available local and available medical facilities and personnel in close proximity to the job site.
- B. Enter into such agreements necessary to meet all customer, federal, and state injury/illness recording requirements.
- C. Report all required injuries to OSHA on the necessary forms.
- D. Comply with any additional reports required by the customer.
- E. Require its employees to report all injuries immediately to insure accurate and timely reporting to all necessary agencies.
- F. Require at least two employees on site qualified and trained to administer First Aid and CPR.

- G. Have available on site First Aid Kits in compliance with ANSI Z 308.1.
- H. Inspect First Aid Kits weekly.
- I. Have signs indicating location of and adequate lighting at the first aid station.
- J. Have an emergency response plan discussed and documented on the activity hazard analysis plan.
- K. Have emergency numbers posted on site.
- L. Emergency plans shall be tested prior to beginning work on each project.

## **PERSONAL PROTECTIVE EQUIPMENT**

In coordination with the activity hazardous analysis performed at each site, personal protective equipment requirements will be determined for the phase of work being performed at each site. The Superintendent/Safety Manager will determine the PPE requirements and monitor usage on a site to site basis. The following areas are of specific concern for this project:

### Material Handling & Installation (Equipment)

- Gloves will be worn
- Eye Protection will be worn
- Ear Protection will be worn

### Flightline Operations

- Ear Protection will be worn
- Communication with Tower will be maintained

### Welding & Cutting

- Protective Eye Shields
- Protective Clothing
- Burn Permits
- Fire Extinguishers

### Fall Protection

- Safety Belts and Lanyards

Employees of Mechworks Mechanical Contractors are instructed in the use of the following items of personal safety equipment:

- A. Hard Hats (Class A & B)
- B. Safety Glasses with side shields
- C. Face Shields
- D. Monogoggles
- E. Steel Toed Shoes and Boots
- F. Hearing Protectors (Plugs and Earmuffs)
- G. Safety Belts and Lanyards
- H. Special Service Suit, Gloves, Boots
- I. Sandblasting Hoods

Mechworks Mechanical Contractors will ensure that employees received training in the proper use, limitations and maintenance of all required personal protection equipment. All equipment shall be tested, cleaned and repaired on a daily basis.